



PA/02077/24

**PROPOSED AGRITOURISM PROJECT, TA' GANTON, TRIQ ID-DAHLA TA'
SAN TUMAS, SQAQ NRU. 2, ŻEJTUN**

PROJECT DESCRIPTION STATEMENT

Version 1: November 2024



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Quality Assurance

Proposed Agri-Tourism Project Project Description Statement Nov 2024

Report for: **Gabriella Agius**

Revision Schedule

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INTRODUCTION

1. This Project Description Statement describes a proposal for an agri-tourism project, at ta' Ganton, Triq id-Dahla ta' San Tumas, Sqaq Nru. 2, Hal Tmin, in Żejtun. The proposal is being taken forward in a Full Development Permit application (PA/02077/24). The Project Description Statement (PDS) has been requested by the Environment and Resources Authority (ERA).
2. The project is proposed by Gabriella Agius, hereinafter referred to as 'the Applicant'; the site is hereinafter referred to as 'the Scheme site' and the proposal is hereinafter referred to as 'the Scheme'. **Figure I** shows the location of the Scheme site.

BACKGROUND

3. The Full Development Permit application was submitted in September 2023 for *“Proposed part reconstruction and sanctioning to partially dilapidated one floor pre-1968 structure and sanctioning of extension and internal alterations and hard stone paving. Sanctioning of reconstruction of part of the rubble walls. Proposed grass blocks and car spaces. Proposed landscaping and proposed change of use to agri-tourism.”* (PA/02077/24).
4. As mentioned, the ERA has requested the submission of a PDS. This request was made on 23rd April 2024, as follows:

“Proposed development lies outside development zone, in an area previously occupied partially by structures, which have been extended without development consent. It is further being proposed to include extensive hard standing areas, the formation of an access road with walls on each side and also the change of use to an agritourism project. This excessive sprawl will lead to unnecessary take-up of rural land. Furthermore, the agricultural land in the immediate vicinity of the proposed development has been impacted by dumping of construction material.

While the ERA does not have an objection to the change of use of the project and to minor alterations to existing structures, any development beyond the committed structures, in particular the formalized access road formation and all hard standing areas are considered excessive and objectionable on environmental grounds and should be removed. Proposed agritourism requires the submission of a PDS. In addition, an extensive clean-up of the construction material from the surrounding agricultural land should be imposed”.

5. On 16th October 2024, the ERA reiterated its request for a PDS *“since the proposal falls within the scope of Schedule, Section, Category 7.1.2.2 of the Environmental Impact Assessment Regulations (S.L. 549.46)”*. In that communication, the ERA also stated

the following:

“With reference to Docs 102a, 102b, 102c and 102d, uploaded on eApps on 10th December 2024, ERA’s concerns have been addressed and the proposal is acceptable”.

6. Importantly, the documents referred to by the ERA are the current drawings pertaining to the Scheme.

OBJECTIVES

7. The Applicant explains the following in respect of the objectives for the Scheme, as follows:

“Agritourism can be an alternative and a means of diversifying from farms. This is a means to create a recreational and leisure activities for tourists. These activities can be a means of economic benefit.

The agritourism activity will give a grasp of the local community life. This activity will enhance the area of its development. It will surely enhance the environment and the management of the typical products. It will support the traditional activities. With agritourism there will be both agriculture and tourism activity.

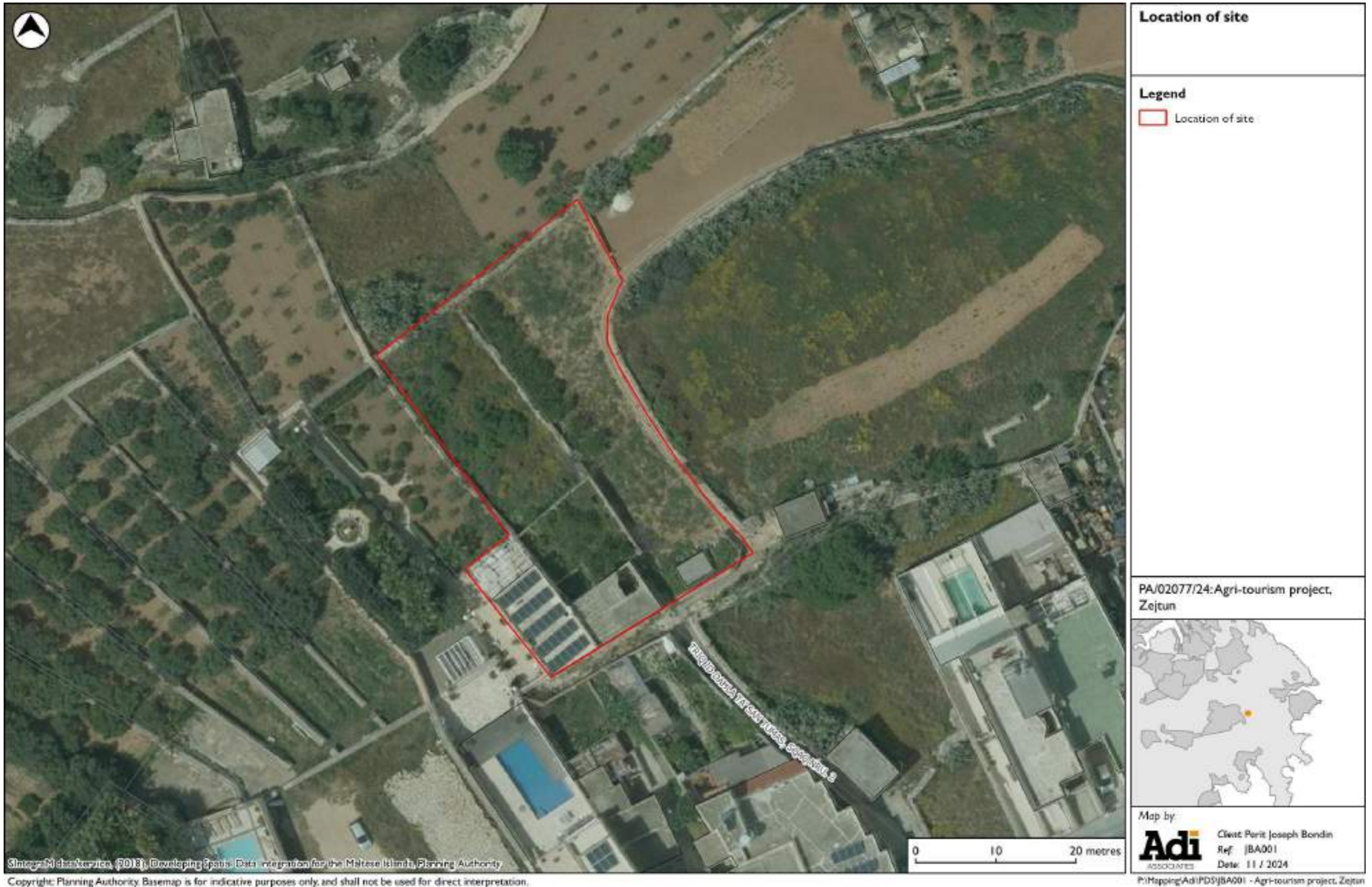
This venture will attract special interest travellers. Travellers with interest in agriculture, nature, greenery. Travellers willing to experience and live in rural areas rather than cities”

ALTERNATIVES

8. No alternative sites were considered for the Scheme. The Applicant explains that:

“The proposed site is ideal for agri-tourism due to its historical connection to olive groves and olive oil pressing (Zejtun). Production has been ongoing for the past 10 years, from old olive trees present on site, and this is well-known for its balanced oil which ultimately affects the taste and quality of this produce. Repurposing the existing, deteriorated building for this purpose would preserve the architectural value of the premises while also preserving its agricultural heritage while creating a space for visitors to engage with the land and learn about traditional practices. This initiative would honour the site’s past, contribute to sustainable tourism, and offer economic benefits by promoting local produce and creating new opportunities for the community”.

Figure 1: Location of the Scheme Site



DESCRIPTION OF THE SCHEME

LOCATION OF THE SCHEME SITE

9. The Scheme site is located at ta' Ganton, Triq id-Daħla ta' San Tumas, Sqaq Nru. 2, in Żejtun (see **Figure 1** above). The site lies within the Żejtun Local Council administrative area.
10. The Scheme lies immediately adjacent to the Category 2 Rural Settlement of Ħal Tmin; the access to the site is from within the Rural Settlement. The Żejtun Development Zone is located approximately 207 m (plan distance) from the Scheme site at the closest point.
11. The Scheme site does not have a frontage on any public road. The site is accessed through Sqaq Nru. 2, which itself takes access off Triq id-Daħla ta' San Tumas, located approximately 49 m (driving distance) to the south of the Scheme site.

CHARACTERISTICS OF THE SCHEME SITE

12. The Scheme site covers an area of approximately 1,420 m². **Figure 2** includes images of the Scheme site as it is currently. **Figure 3** shows aerial images of the Scheme site from 1998 to 2018 (Planning Authority's GeoServer), showing the evolution of the site over that period.
13. The Scheme site comprises two fields with a large single-storey building located on the southwest corner of the site, as well as a smaller single-storey building in the southeast corner. Both buildings have been recently renovated, in readiness for the Scheme. The area around the structures is still rough ground.
14. The Applicant explains that the smaller building and the majority of the larger building date from pre-1968, and these structures are evident in the 1998 aerial image. The aerial images in **Figure 3** reveal that the larger building was extended on its northeast corner sometime in the period since 1998. **Figure 3** also reveals the installation of the Photo-voltaic (PV) panels on the roof of the larger building sometime in the period between 2012 and 2016.
15. As mentioned, the Scheme site is accessed through Sqaq Nru. 2, off Triq id-Daħla ta' San Tumas. **Figure 2** includes images of this alleyway, including where it intersects with Triq id-Daħla ta' San Tumas.
16. There is currently a right of way through the Scheme site, serving as access to the rural land to the north. As evident from the Scheme drawings included below, it is intended to retain this right of way, which runs along the eastern boundary of the site.

Figure 2: Images of the Scheme Site



Larger building on the left and smaller building on the right (looking northwest from the entrance to the Scheme site)



Larger building (looking northwest from the entrance to the Scheme site)



Smaller building (looking north from the entrance to the Scheme site)



Access to the Scheme site, at the junction of Sqaq Nru. 2 and Triq id-Daħla ta' San Tumas (looking northwest)



Looking northwest along Sqaq Nru. 2, with the Scheme site in the background)



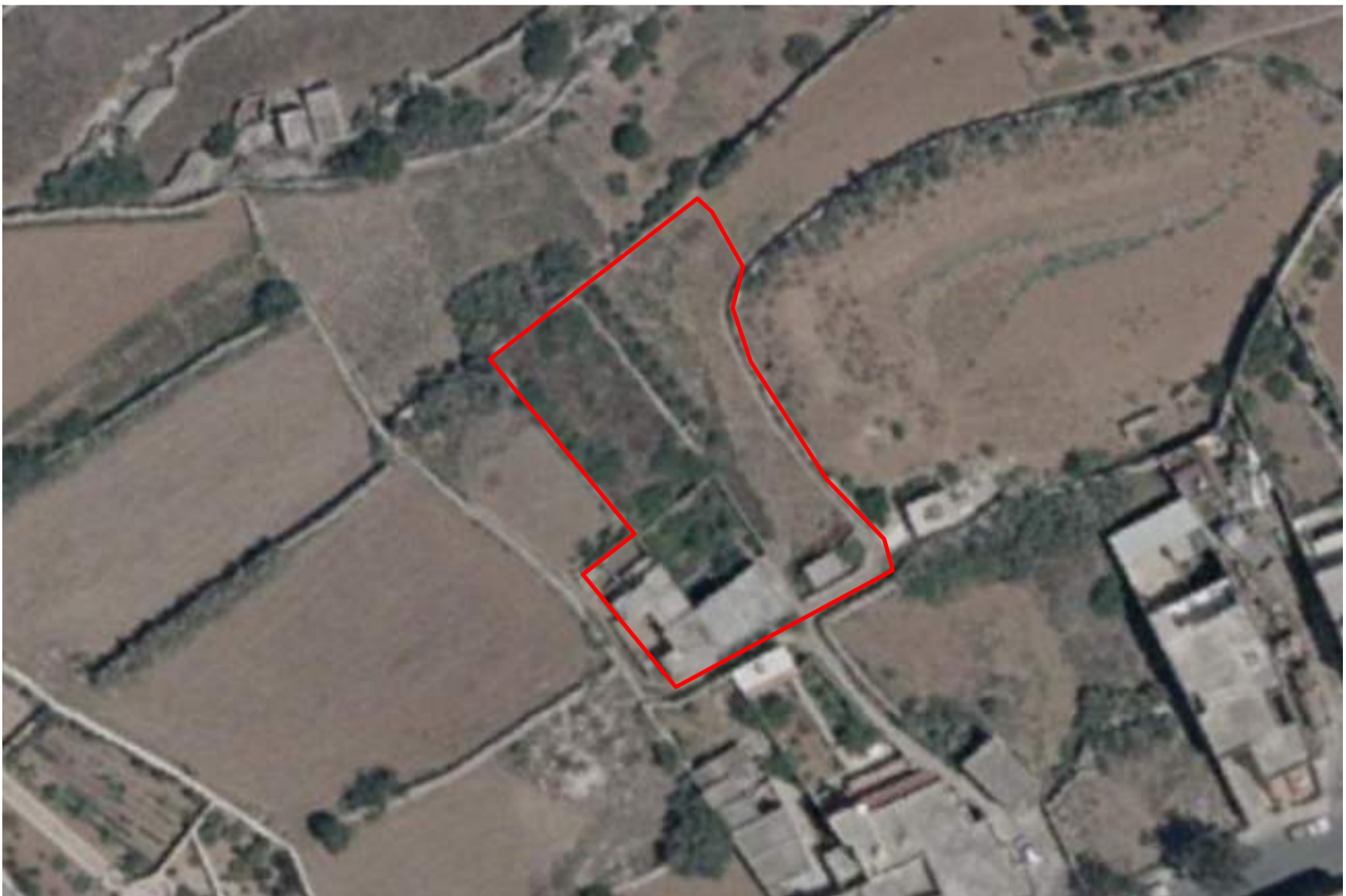
Access to the Scheme site, on Sqaq Nru. 2 (looking northwest)

Figure 3: Aerial Images of the Scheme Site 1998 – 2018 (Planning Authority's GeoServer)

1998



2004



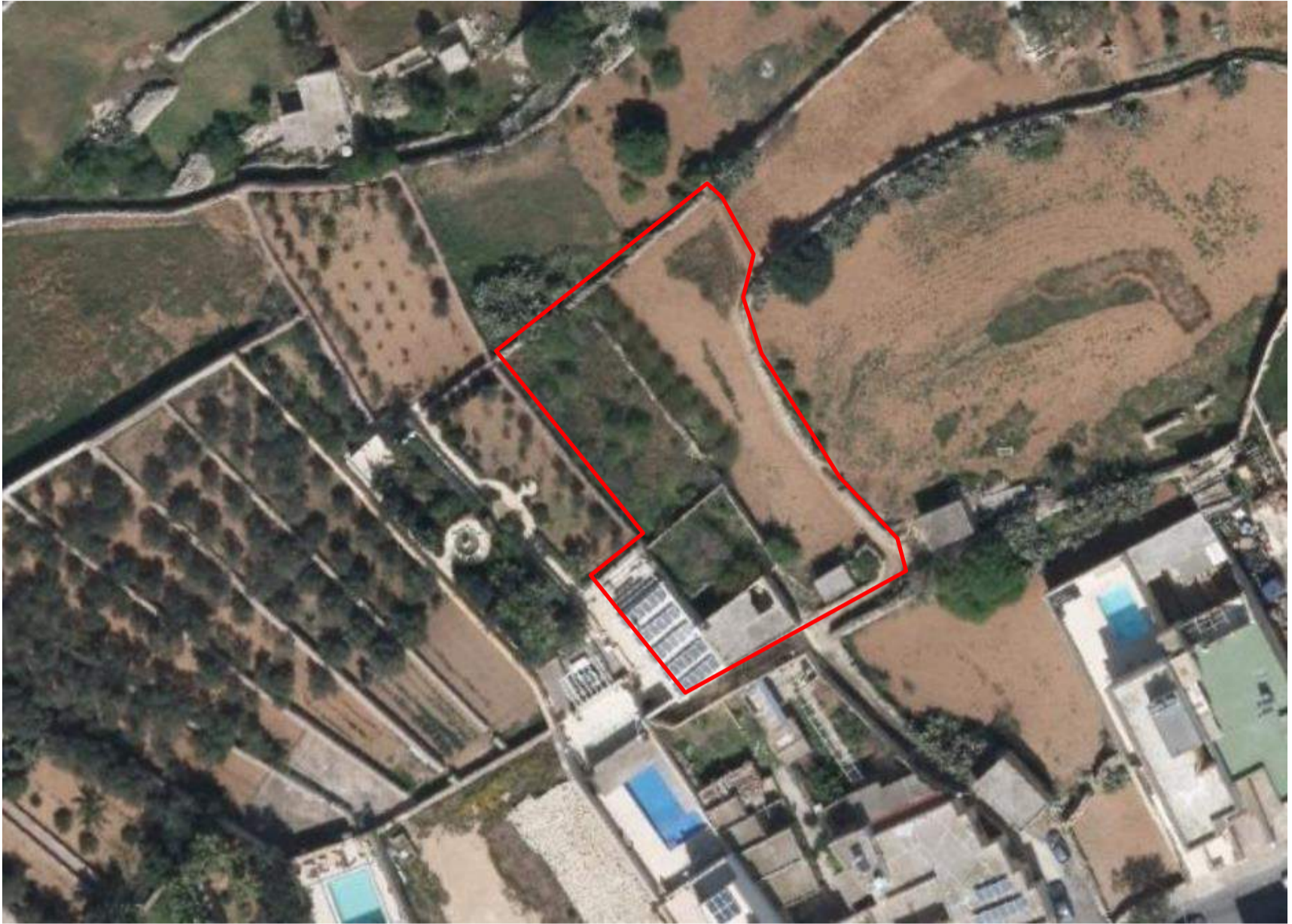
2008



2012



2016



2018



POLICY CONTEXT

17. In the South Malta Local Plan, the Scheme site is identified as lying within an 'Agricultural Area (awaiting classification)', as designated under **POLICY SMAG 01**, as well as within a Valley Protection Zone, as designated under **POLICY SMCO 07** (see **Figure 4**).
18. **POLICY SMAG 01** advocates the protection of agricultural land, where “*only buildings, structures and uses essential to the needs of agriculture will be permitted*”. **POLICY SMCO 07** provides that in Valley Protection Zones “*there will be a presumption against any development within these areas that will adversely affect the function of the valley as an important water catchment area*”.

DESCRIPTION OF THE GENERAL SURROUNDINGS

Land Uses

19. A land use survey was conducted in November 2024, to describe the land use patterns within approximately 250 m radius of the Scheme site. The surrounding land uses are shown in **Figure 5**. **Figure 6** shows images of the surrounding land uses.
20. The Scheme site is located Outside Development Zone (ODZ). As mentioned, it lies adjacent to the Category 2 Rural Settlement of Ħal Tmin, where the access to the site is from within the Rural Settlement. The nearest Development Zone is Żejtun, which is located approximately 207 m (plan distance) to the west of the Scheme site at the closest point.
21. Ħal Tmin has a linear formation spread along the relatively busy Triq id-Daħla ta' San Tumas linking Żejtun with Marsasala. The settlement comprises a mix of primarily older, traditional properties, including farmhouses, some of which have been restored. There is one small shop and a number of garage businesses.
22. The small chapel of St Mary of Ħal Tmin is located approximately 335 m to the southeast of the Scheme site.
23. The areas surrounding Ħal Tmin to the north, east and south, and in the gap between the settlement and the Żejtun Development Zone are characterised by agricultural land, including cultivated land, and farm-related structures.
24. There are extensive open views east, as far as the settlement of Marsasala.

Geology, Geomorphology, and Hydrology

25. **Figure 7** shows the geological features of the Scheme site and the surrounding area. The rock beneath the Scheme site is Globigerina Limestone. Lower Globigerina Limestone Formation is a relatively weak limestone, consisting of the shells of marine micro-organisms that were once deposited at the bottom of a deep sea, and subsequently compacted and cemented together with time.

26. **Figure 8** shows the hydrological features of the Scheme site and the surrounding area. The Scheme site is located on the Malta Mean Sea Level Aquifer and is outside the 300 m buffer of the Groundwater Safeguard Protection Zone. There are no water galleries in the immediate vicinity of the site.

Natural and Cultural Heritage

27. **Figure 9** shows the cultural heritage designations in the vicinity of the Scheme site. There are no natural heritage designations in the area surrounding the Scheme site. The nearest such designation is Il-Magħluq tal-Bahar Area of Ecological Importance (AEI), Site of Scientific Importance (SSI), and Natura 2000 site, which lies on the coast at Marsascala, approximately 1.4 km (plan distance) from the Scheme site.
28. The nearest cultural heritage feature is the Grade I scheduled Dar il-Kastillan (Government Notice 21 of 2010), located approximately 250 m (plan distance) to the east of the Scheme site, within the Żejtun Development Zone. As mentioned, the St Mary of Ғal Tmin Chapel is located approximately 335 m to the southeast of the Scheme site. This Chapel is listed in the National Inventory of Cultural Heritage.

Figure 4: Environmental Constraints Map (extracted from the South Malta Local Plan)

Scheme site shown circled in red

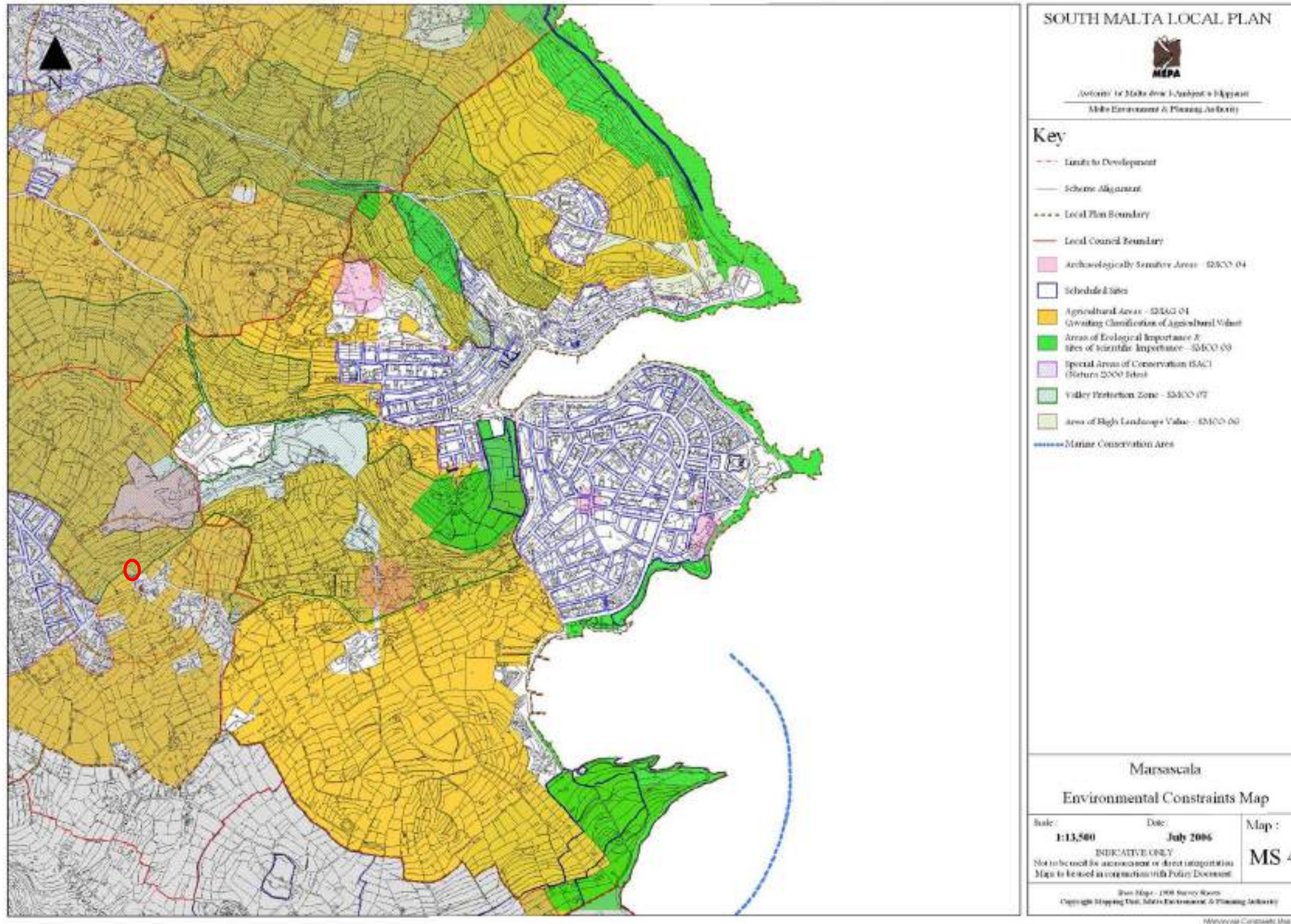


Figure 5: Surrounding Land Uses

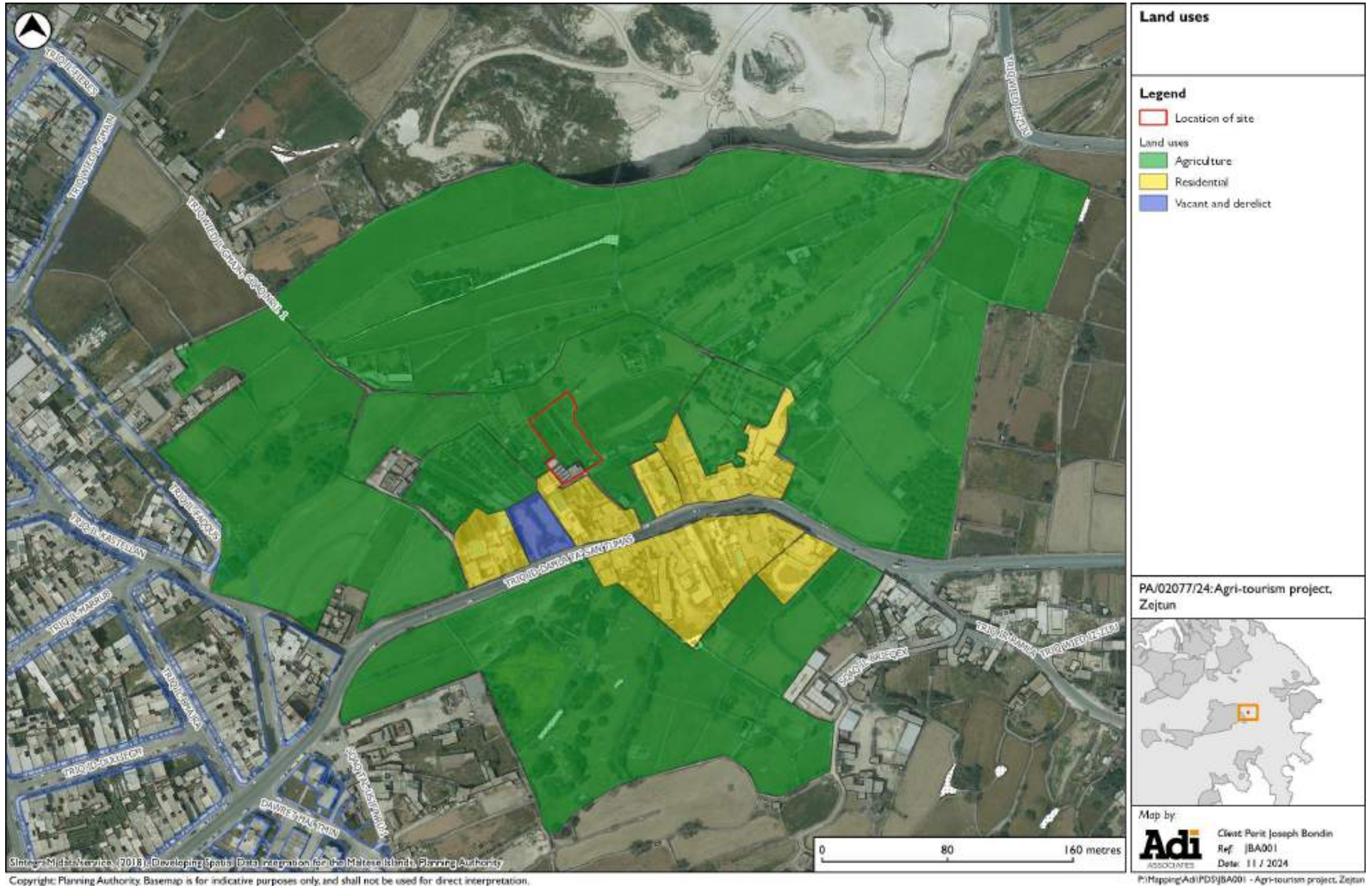


Figure 6: Images of the Land Uses in the vicinity of the Scheme Site



The edge of the Žejtun Development Zone



Western edge of the Rural Settlement of Hal Tmin



Rural Settlement of Hal Tmin



Rural Settlement of Hal Tmin





Rural Settlement of Hal Tmin



Rural Settlement of Hal Tmin

St Mary of Hal Tmin Chapel



Agricultural land surrounding the Rural Settlement of Hal Tmin

Figure 7: Geology of the Area

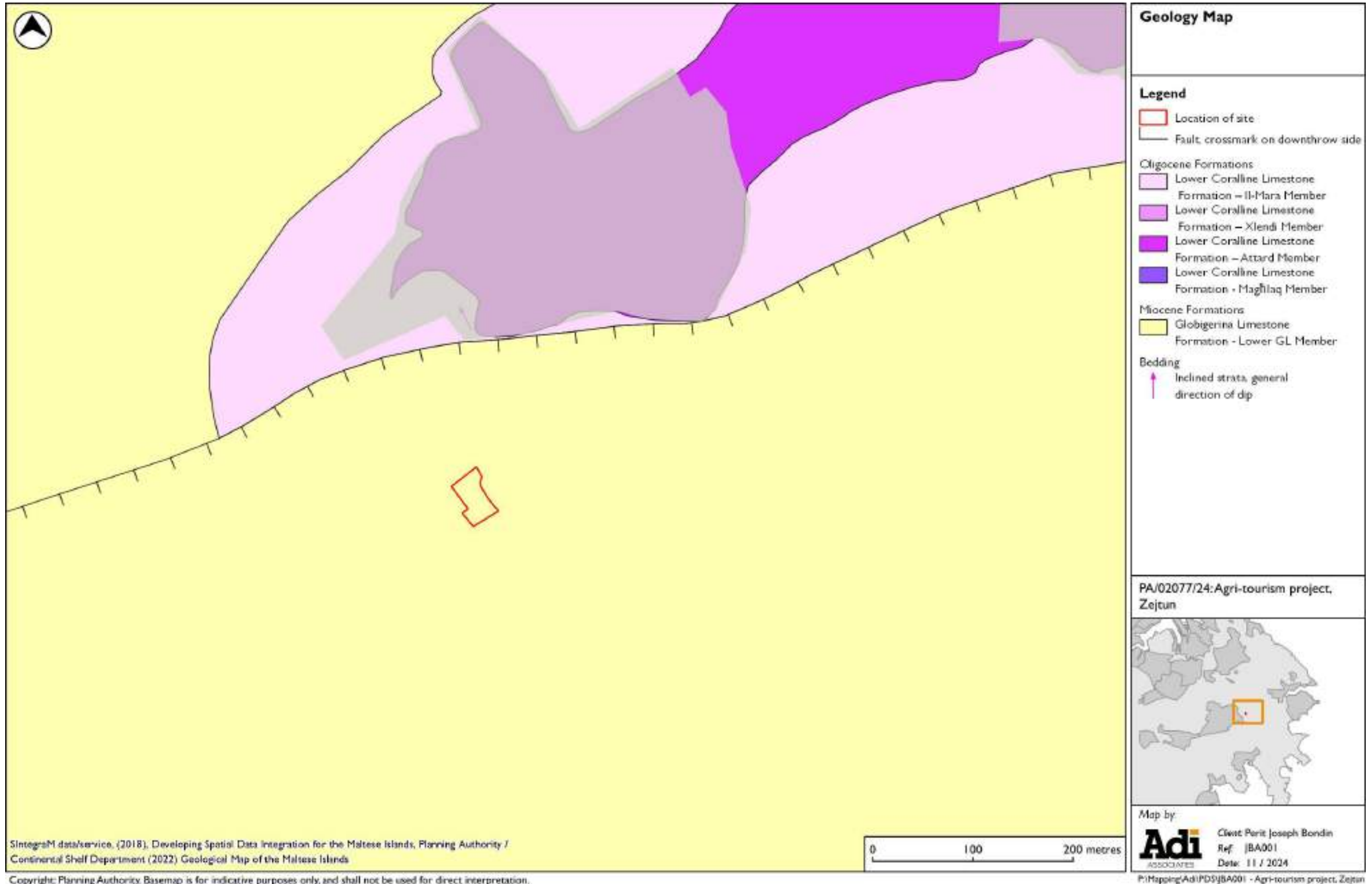


Figure 8: Hydrology of the Area

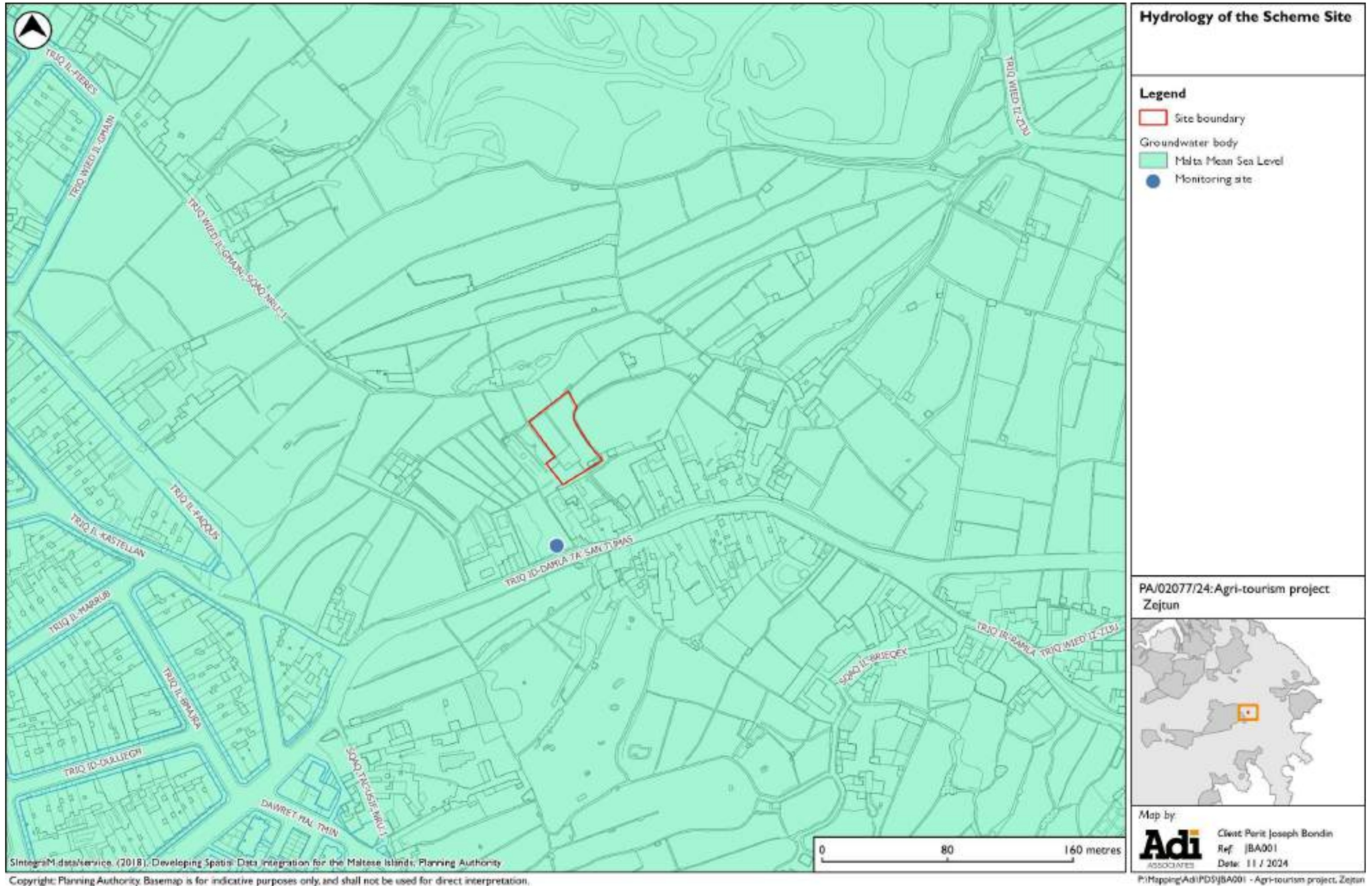


Figure 9: Cultural Heritage Designations



THE SCHEME

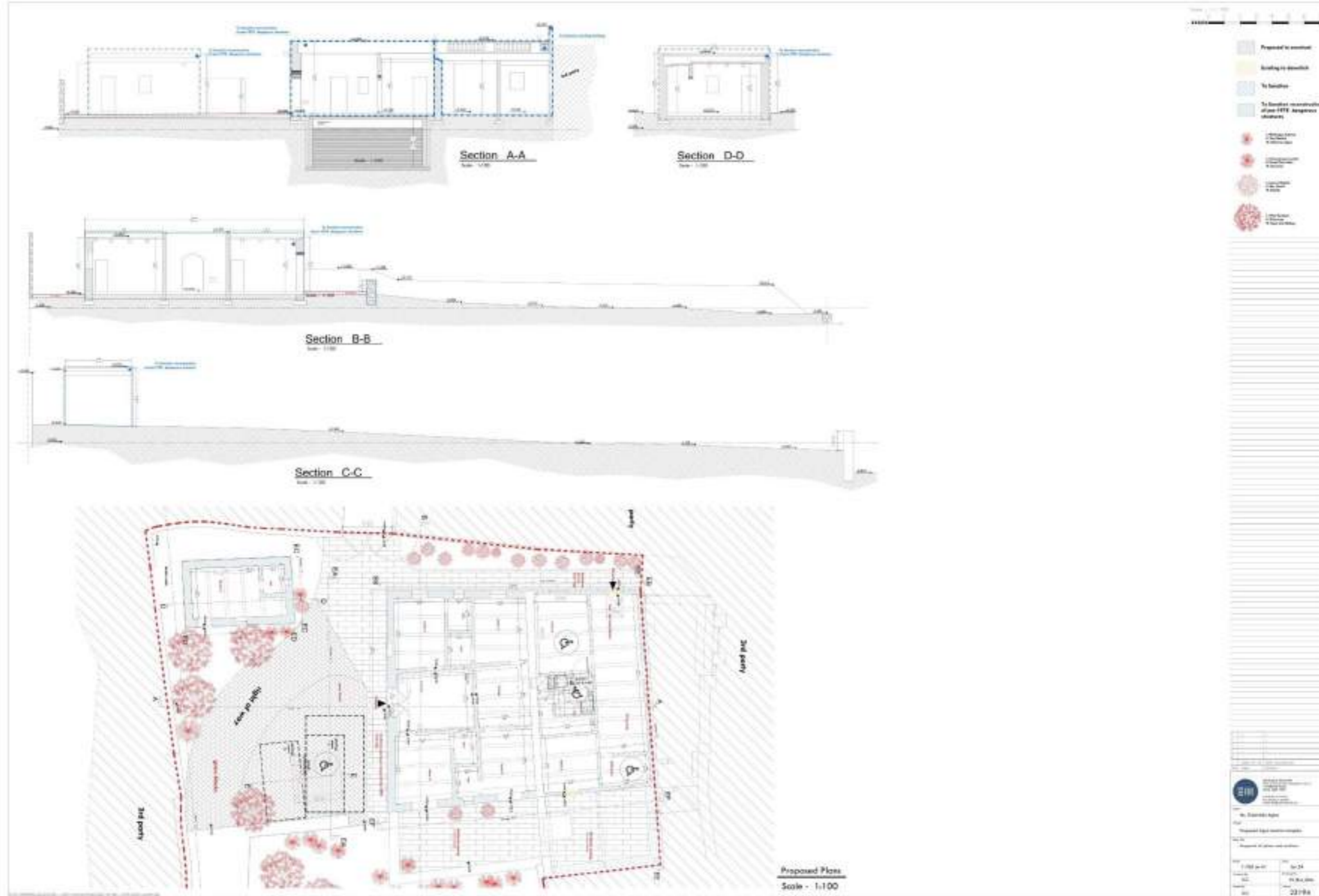
29. The Scheme envisages the reconstruction and part-extension of pre-1967 structures for use as an agri-tourism complex. The Scheme drawings are included as **Figure 10**. The complex will comprise a total of seven guestrooms - six accommodated within the larger building and the seventh accommodated in the smaller building. The larger building will also accommodate a 'breakfast / kitchen area' and a 'living area'.
30. The existing buildings have a cumulative footprint and Gross Floor Area (GFA) of approximately 239 m² (17% site coverage). The scale of the extension (constructed post-1967) is approximately 75 m². As mentioned, both buildings are single-storey. The larger building has an overall height of approximately 4.4 m; the smaller building has an overall height of 3.7 m. The Scheme envisages no change to the footprint or GFA, or to the building heights.
31. The area around the larger building, and extending to the entrance to the site, will be laid with hardstone paving (an area of approximately 66 m²). The area around the smaller building will be beaten earth. There will be an area laid with grass blocks to the north of this (an area of approximately 113 m²); this area will accommodate two car parking spaces (including one accessible parking space).
32. The Applicant explains that the intention is to have an electric vehicle that will be used for airport transfers, as well as to shuttle guests to / from the centre of Żejtun.
33. As mentioned, there is currently a right of way through the Scheme site, serving as access to the rural land to the north, and it is intended that this will be retained. This area will also be laid with grass blocks.
34. The fields to the north of the buildings will be retained, and it is proposed to retain the existing trees and supplement this planting within the fields and around the buildings. **Figure 10** illustrates that the majority of trees are Olives (*Olea europaea*), along with Bay Laurel (*Laurus nobilius*), Dwarf Fan Palm (*Champaerops humillus*), and Tree Medick (*Medicago arborea*). All of these species are acceptable in ODZ / urban fringe locations, with reference to MEPA's *Guidelines for Trees, Shrubs and Plants for Planting and Landscaping in the Maltese Islands*.
35. In respect of the external lighting arrangements, the Applicant explains that traditional lighting lanterns have been installed on the façades of the buildings, fitted with low-power LED lamps, to reduce light spill.
36. As mentioned, the Scheme will be accessed from Sqaq Nru. 2. The Applicant explains that electricity, water and drainage infrastructure will be laid along alleyway to serve the Scheme, and that the alley will then be resurfaced.
37. It is envisaged that the Scheme will have a staff complement of three – a full time Receptionist / Kitchen Assistant, a full-time Housekeeper, and a full-time Gardener.

Figure 10: Scheme Drawings





PROVISION: Not Available To Applicant/Not Available To Consultant of Color - Project Number: 23110004



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RESOURCES

Energy

38. As mentioned, there are PV panels on the rooftop of the larger building. These generate 828 kWh per month (9.02 mWh annually). This will be sufficient to provide for the electricity needs of the Scheme (envisaged to be approximately 380 kWh per month - 4 mWh annually). The Applicant explains that there is an electrical meter 3Phase X 60A installed on site, and that it is proposed to lay electricity infrastructure along Sqaq Nru. 2. The Applicant also explains that it is not intended to install a generator on site.
39. The Applicant explains that the buildings have been constructed with regard to passive design principles, including with attention to insulation (roof and of all rooms).

Water

40. There is a large underground reservoir on site, with a storage capacity of approximately 85,000 L. The collected water will be used as second-class water, and for landscaping. It is envisaged that the Scheme will have a daily water consumption of approximately 250 L. The Applicant explains that it is proposed to lay mains water infrastructure along Sqaq Nru. 2.

Raw Materials

41. The Applicant explains that the raw materials used in the reconstruction and extension of the buildings have included recycled stone blocks / slabs and recycled timber beams. Timber has also been used for apertures.

SCHEME CONSTRUCTION

42. As mentioned, the buildings on site have already been reconstructed and extended in readiness for the Scheme. The only works required to complete the Scheme for operation is the landscaping (the laying down of the paving / grass blocks and the new planting).

WASTE MANAGEMENT

43. The Scheme will generate primarily operational waste when it comes into operation, and the waste volumes will be relatively minimal give the scale of the agri-tourism. Wastes will be separated in accordance with the current waste management regulations (including batteries) and disposed of having regard to the current arrangements for collection and disposal in domestic waste of Hal Tmin.
44. In respect of the disposal of foul water, the Applicant explains that there is a cesspit on site and that it is proposed to lay new drainage infrastructure along Sqaq Nru. 2.

POTENTIAL ENVIRONMENTAL IMPACTS

45. Environmental impacts can be negative as well as positive and their assessment is important so as to better define the effects that a proposal may have on its receiving environment. In respect of the Scheme, it is also important to take account of the fact that the reconstruction / rehabilitation of both buildings and the extension of the larger building have already been carried out. Hence, the following identifies the environmental impacts that have already been affected, as well as the potential environmental impacts from the remaining works to be undertaken and from the operation of the Scheme. The list identifies only those impacts that have been / could be significant.

46. The significant impacts from the construction and operation of the Scheme are considered to be:

- **Impacts on the geo-environment**, *from site excavation and construction.*

There has been relatively limited excavation carried out in extending the larger pre-1967 building (for foundations only). However, the extension of the larger building has taken up an additional approximately 75 m² of land. It is also proposed to lay approximately 66 m² of hardstone paving. Hence, when completed, there will be a cumulative soil sealing to the scale of approximately 141 m². It is recognised that the Scheme will also include approximately 113 m² laid with grass blocks, which is designed to facilitate water percolation. However, the soil sealing that has / will occur has / will reduce the area available for water seepage. Taking account of the high degree of soil sealing as a percentage of the total land area in Malta as a whole, any further soil sealing where it affects ground water recharge is considered to have a negative impact.

- **Impacts on agriculture**

The whole of the Scheme site is identified as Agricultural Land in the Local Plan, and the 2018 aerial image shows that the land now occupied by the extension to the larger building, and the land that has been cleared around the two buildings, was cultivated as recently as 2018. The Scheme has resulted in the loss of approximately 270 m² of agricultural land with the potential for agricultural production.

- **Traffic impacts**, *arising from the operation of the Scheme*

Whilst it is intended to shuttle guests to / from the site, the Scheme has the potential to generate some additional vehicular traffic, in connection with both guests and staff, with implications for traffic emissions (noise and air quality), although these are unlikely to be significant having observed the current traffic flows along Triq id-Dahla ta' San Tumas.

- **Impacts on landscape character and visual amenity**

The Scheme site is essentially a ‘back land’ site, located to the rear of the townscape fronting Triq id-Dahla ta' San Tumas. The existing buildings on the site are not visible from this road and there is a relatively limited viewshed from the rear. The buildings have already been reconstructed and extended in readiness for the Scheme, as mentioned, and, as illustrated in **Figure 2**, the buildings have a traditional form and appearance. The additional landscaping works to be carried out will not serve to significantly alter the visual appearance of the buildings, and the new planting will serve to facilitate their visual integration.

MITIGATION PROPOSALS

47. Preliminary potential mitigation measures associated with the identified impacts during the construction of the Scheme include:
- Ensuring the adoption of best practice environmental measures throughout the remaining works to be carried out on the site in readiness for operation.
 - Use of effective permeable material for all hard surfacing, to facilitate water infiltration and sustainable drainage and the appropriate maintenance of all the permeable-surfaced areas to ensure that their permeability effectiveness remains high in the longer term.
 - Adoption of operational management practices optimising the collection and reuse on site of rainwater, having regard to the requirements of the Building Regulations Technical Guidance Part F: Conservation of Fuel, Energy and Natural Resources.
 - Adoption of a planting regime adhering to MEPA’s *Guidelines for Trees, Shrubs and Plants for Planting and Landscaping in the Maltese Islands* and that is ecologically compatible with the adjacent natural habitats.
 - Adoption of an external lighting regime adhering with BirdLife Malta’s *Guidelines for Ecologically Responsible Lighting*. External lighting should be minimal and designed and managed so as to limit light spill. In particular, no lights should be shone onto the surrounding natural areas.