



PA/07438/24

CONVERSION OF AN EXISTING APPROVED DISUSED FIREWORKS FACTORY INTO A PROPOSED OLIVE OIL PRODUCTION INCLUDING ANCILLARY STORES, AGRICULTURAL STORES AND A SMALL ANCILLARY RETAIL SHOP, AND PLANTING OF NEW TREES, DINGLI

PROJECT DESCRIPTION STATEMENT



Version I: May 2025



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Quality Assurance

Proposed Olive Oil Production Facility Project Description Statement May 2025

Report for: **A360 Architects**

Revision Schedule

					Approved by:
00	May 2025	Submission to client	Rachel Xuereb Director	Eilis McCullough Senior Planning Consultant	Adrian Mallia Managing Director

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Kappara Business Centre
113 Triq Birkirkara
San Gwann SGN 4197
MALTA

Tel.: 21378172

Email: mgmt@adi.com.mt
Web: www.adi-associates.com

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INTRODUCTION

1. This Project Description Statement describes a proposal for an olive oil production facility that includes ancillary stores, agricultural stores and a retail shop, and planting of new trees, at Triq Panoramika in Dingli. The proposal is being taken forward in a Full Development Permit application (PA/07438/24). The Project Description Statement (PDS) has been requested by the Environment & Resources Authority (ERA).
2. The project is proposed by Pulvich Explosives Industries, 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 July 2024 for “The conversion of an existing approved disused fireworks factory into a proposed olive oil production including ancillary stores, agricultural stores and a small ancillary retail shop, and planting of new trees.” (PA/07438/24).
4. As mentioned, the ERA has requested the submission of a PDS. This request was made on 15th November 2024, as follows:

“Following online meeting on 13.11.24, as discussed kindly find below the information/plans to be provided:

- i. *A works method statement (WMS) of how works will be carried out noting sensitive context and location, including: mitigation measures to prevent over spills, machinery to be utilised, location of parking of machinery & storage of demolition/construction material, passageway re-construction methodology, amongst other details.*
- ii. *The finish of the passageway in front of the rooms and paved area near the retail shop are to be finished in crazy flagstone paving.*
- iii. *Updated photomontages showing:*
 - *The removal of Cypress trees and formal landscaping. Existing landscaping should be retained.*
 - *The retail parapet area finished with crazy flagstone paving rather than grass blocks.*
 - *The three apertures colour options. Preferably these should be neutral colours that blend with the natural surroundings.*
- iv. *Sections, elevations and specifications of the passageway (width, finish, etc.).*

- v. *Removal of the formal parking areas with dimensions at Doc.8n, and a simple reference “area for parking of vehicles”.*
- vi. *Infrastructure, drainage and lighting details. As discussed, external lighting on site should be avoided.*
- vii. *The justification for the requirement of the large canopies.*
- viii. *The submission of a PDS in terms of Schedule I, Category II, Sections 12.4.2.1 and 12.4.2.2 of the Environmental Impact Assessment Regulations (S.L.549.46)”.*

OBJECTIVES

5. The Applicant explains the following in respect of the objectives for the Scheme:

“The conversion of the former existing firework factory to an olive oil production facility and the establishment of agricultural stores offers several benefits to the area and environment:

1. Environmental Sustainability: Olive oil production is a more environmentally sustainable alternative to fireworks manufacturing, which often involves hazardous materials and processes. By repurposing the factory for olive oil production and cultivating olive trees on the surrounding land, the project promotes eco-friendly practices and contributes to biodiversity conservation.

2. Design and Context: The project will create a complete redesign and redevelopment of the existing structures, with parts to be re-constructed to remove any danger, reducing the long-distance visual impact and ensuring that the overall design is of a high quality rural design with the use of natural materials and elements, giving the site an overall positive organic approach that fits within the rural context of the Dingli cliffs and surrounding environment.

3. Cultural Preservation: Olive oil production has deep cultural significance in Malta. By investing in olive oil production, the project contributes to the preservation of cultural heritage and traditions associated with olive cultivation and processing.

ALTERNATIVES

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

“The conversion of the former firework factory to an olive oil production facility and the establishment of agricultural stores represent a sustainable and forward-thinking approach to the land use and the proposed redevelopment. By repurposing existing infrastructure and embracing environmentally friendly practices, the



project not only revitalizes the immediate rural surroundings but also promotes community well-being and environmental stewardship”.

Figure 1: Location of the Scheme site



DESCRIPTION OF THE SCHEME

LOCATION OF THE SCHEME SITE

7. The Scheme site is located in an area known as Rdum tal-Ifhar, just off Triq Panoramika in Dingli (see **Figure 1** above). The site lies within the Dingli Local Council administrative area.
8. The Scheme lies to the west of the town of Dingli and is located approximately 350 m (plan distance) from the Scheme site at the closest point.
9. Part of the Scheme site has frontage on Triq Panoramika but the site is accessed through an unnamed rural road, which itself takes access off Triq Panoramika.

CHARACTERISTICS OF THE SCHEME SITE

10. The Scheme site covers an area of approximately 12,620 m²; this includes the agricultural land to the south and east of the proposed interventions. **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.
11. The former fireworks factory, covered by a PAPB permit, comprises former manufacturing chambers, explosives stores, general stores, security rooms and other ancillary facilities, all nestled within the cliff face overlooking a stretch of terraced agricultural land that spans approximately 9,000 m² (9 tumoli) that are part arable, part not. As mentioned, access to the site is through a public vehicular side road branching off from Triq Panoramika. A section of this access road gave way when a boulder from the cliff fell on the road causing considerable damage as illustrated in **Figure 2**. 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 shown 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




		
<p>Unnamed access to the Site off Triq Panoramika</p>	<p>Some of the existing buildings and canopy at the Site</p>	<p>Former winch that was used to haul material up and down the cliff face</p>
		
<p>Small building and gate on the upper level of the Site on Triq Panoramika</p>	<p>Boulders that fell from the cliff onto the access to the Site</p>	<p>View of the proposed informal car park on Triq Panoramika</p>

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

1998



2004



2008



2012



2016



2018



DESCRIPTION OF THE GENERAL SURROUNDINGS

Land Uses

12. A land use survey was conducted in January 2025, to describe the land use patterns within approximately 250 m radius of the Scheme site. The land uses map is shown in **Figure 4**. **Figure 5** shows images of the surrounding land uses.
13. The Scheme site is located Outside Development Zone (ODZ). As mentioned, it lies to the west of the town of Dingli, which is the nearest Development Zone. As shown in the land use map in **Figure 4**, the predominant surrounding land uses are mainly rural with agriculture and natural areas dominating the landscape. Few buildings dot the landscape and are mainly rural in nature. Triq Panoramika is a popular road that is used by locals and tourists to visit the picturesque Dingli Cliffs, a highly sought after local attraction.

Geology, Geomorphology, and Hydrology

14. **Figure 6** shows the geological features of the Scheme site and the surrounding area. The rock beneath the Scheme site is Upper Coralline Limestone and Blue Clay. The Blue Clay (Maltese: *tafal*) is a blue-gray mudstone measuring up to 65 m thick. Since it forms an impermeable layer beneath the Greensand (where present) and Upper Coralline Limestone formations, it allows the capture of rainfall and the creation of aquifers. Water is extracted through wells or escapes through occasional springs when the topsoil has been eroded.
15. The top layer, the Upper Coralline Limestone (Maltese: *Qawwi ta' Fuq*), is the youngest formation and is around 140 m thick; it is a hard, pale-grey limestone.
16. **Figure 7** shows the hydrological features of the Scheme site and the surrounding area. The Scheme site is partly located on the Malta Mean Sea Level Aquifer and on the edge of the Rabat-Dingli perched aquifer. The latter is the largest perched groundwater body in the Maltese islands, sustained in the Upper Coralline Limestone formation by the underlying Blue Clay formation. The Scheme site is outside the 300 m buffer of the Groundwater Safeguard Protection Zone.

Natural and Cultural Heritage

17. **Figure 8** shows the natural and cultural heritage designations in the vicinity of the Scheme site. The closest cultural heritage features (Cultural Heritage Discoveries FHVL153) are structural remains located just over 300 m to the north of the site. The closest feature that is listed in the National Inventory is a statue of St Paul. This is located around 630 m to the east of the site. There are no cultural heritage designations in the area surrounding the Scheme site. The nearest scheduled cultural heritage designation is the Simblija medieval settlement. This is located around 630 m to the north of the Scheme site and is protected for its archaeological, architectural, and cultural value.
18. The Scheme site is located within a Special Area of Conservation known as Rđumijiet ta' Malta: Ir-Ramla taċ-Ċirkewwa sal-Ponta ta' Bengħisa (MT0000024) designated under Government Notice No. 1379 of 2016, in accordance with the Flora, Fauna

and Natural Habitats Protection Regulations, 2016 (S.L. 549.44). It is also protected as an Area of High Landscape Value and a Level 2 Area of Ecological Importance (GN 400 of 1996).

Figure 4: Surrounding Land Uses

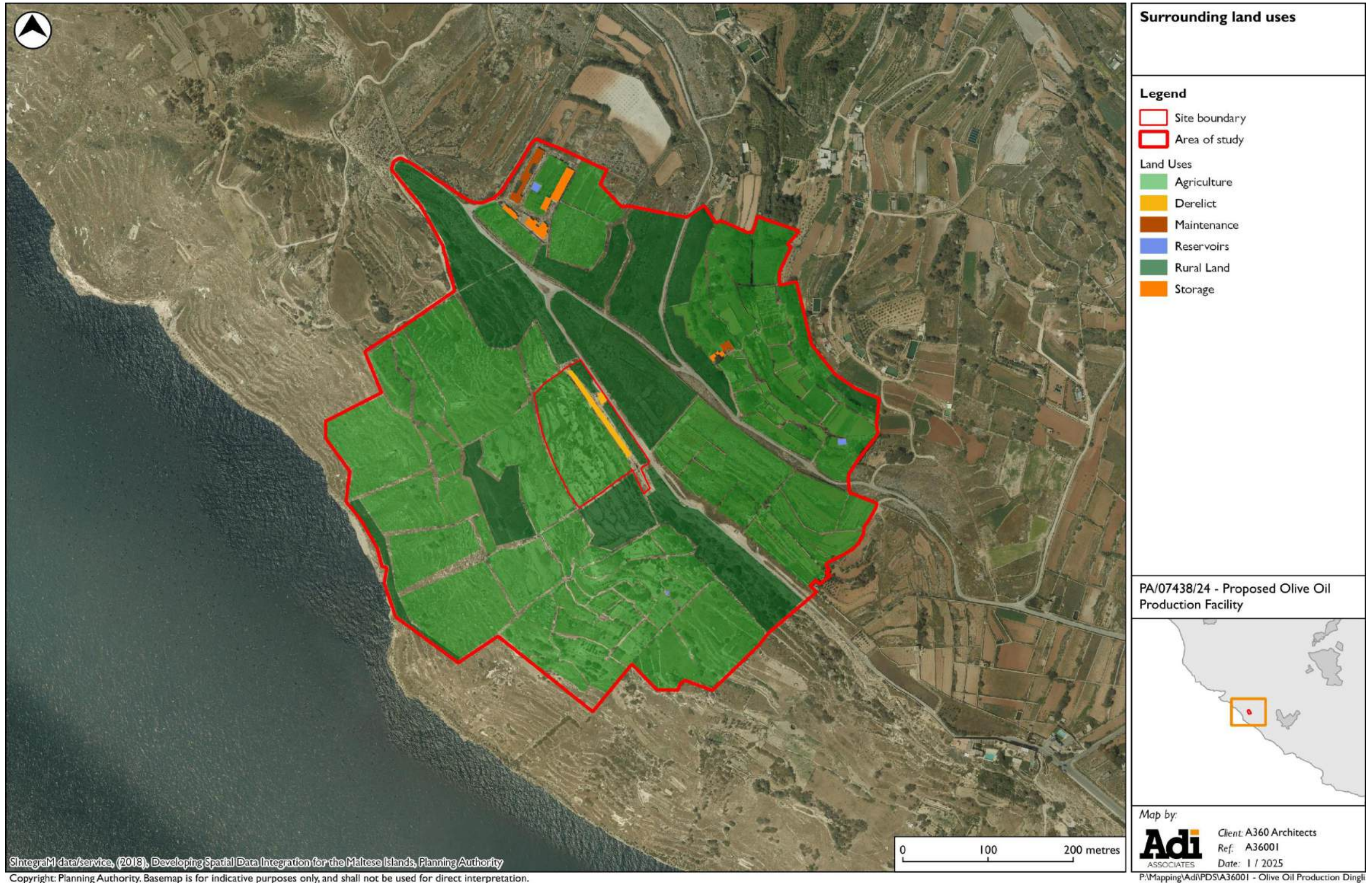


Figure 5: Images of the Land Uses in the vicinity of the Scheme site



View of Filfla from the Scheme site, garigue in forefront



Rural structure and agricultural area to the north of the Scheme site



Rural land to the northeast of the Scheme site



Agricultural land adjacent to the Scheme site

Figure 6: Geology of the Area

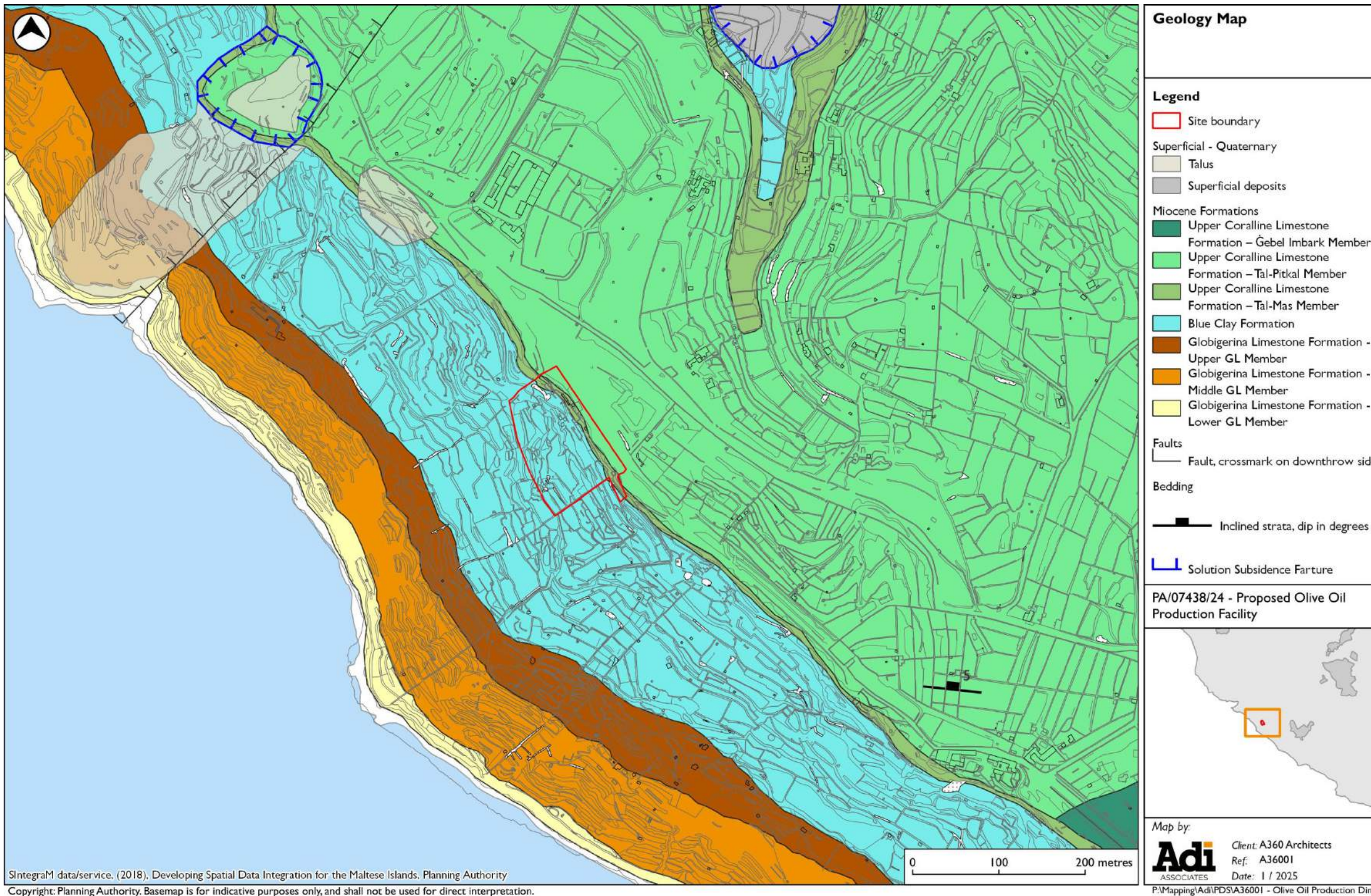


Figure 7: Hydrology of the Area

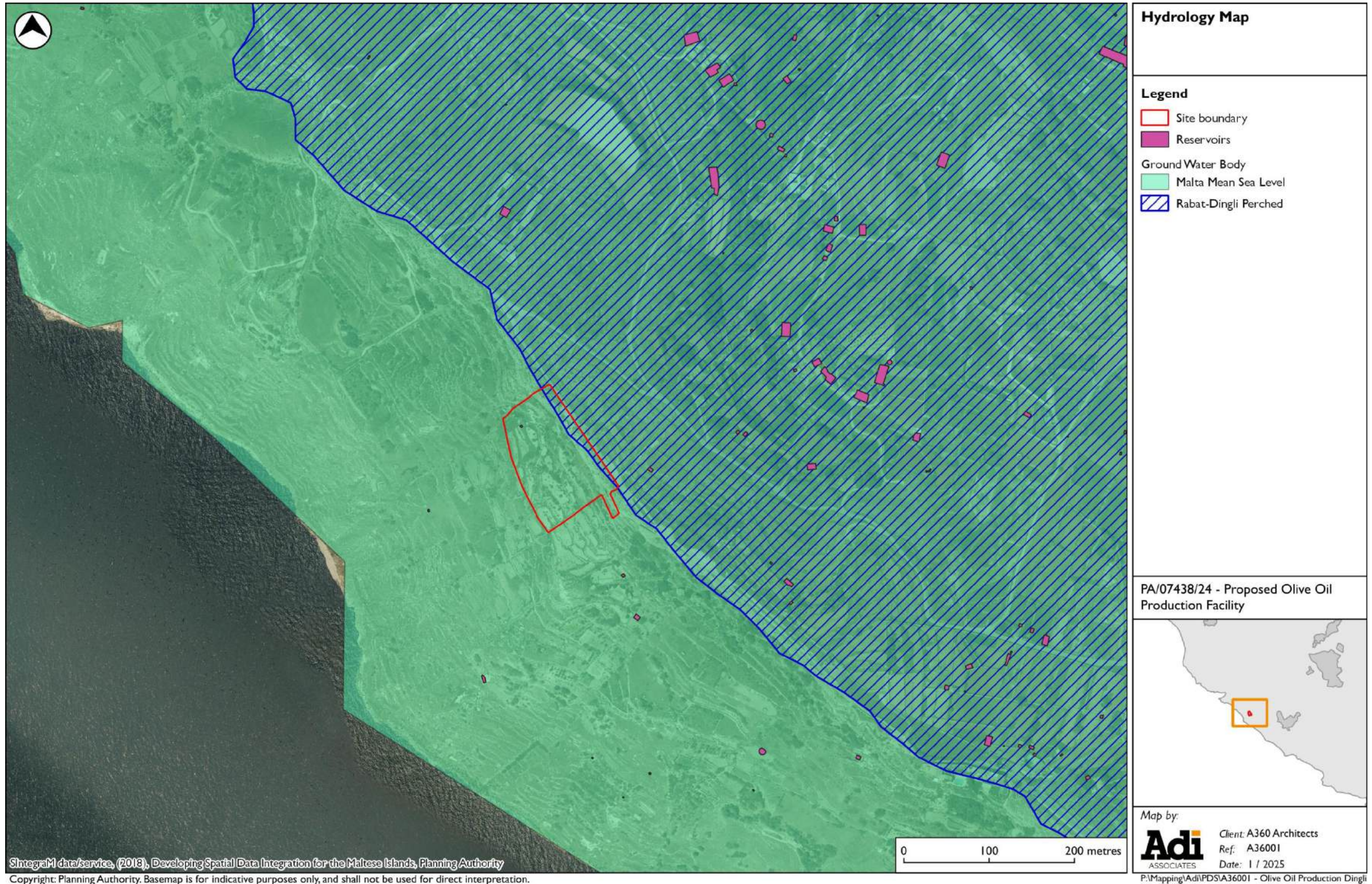
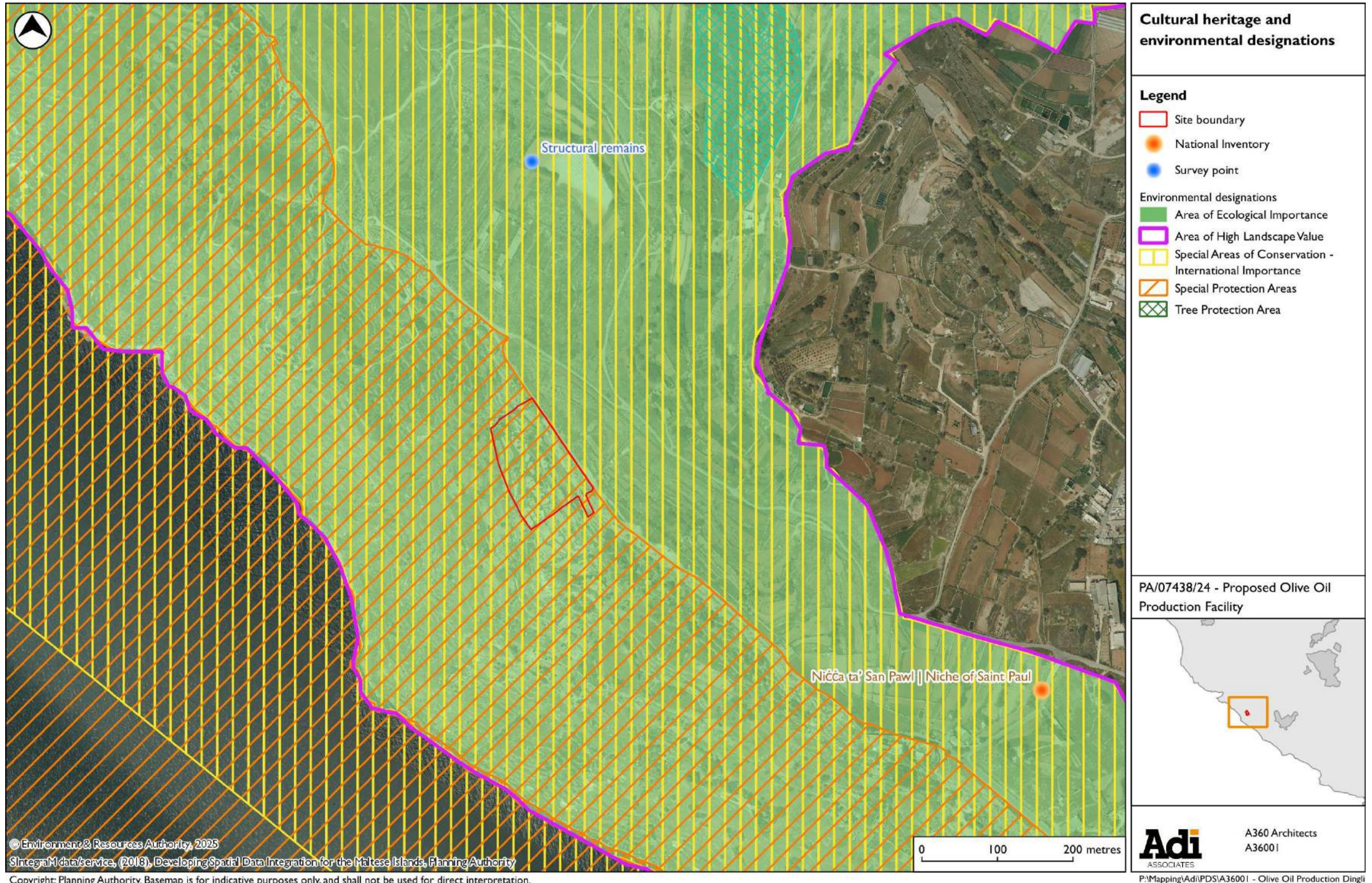


Figure 8: Natural and Cultural Heritage Designations

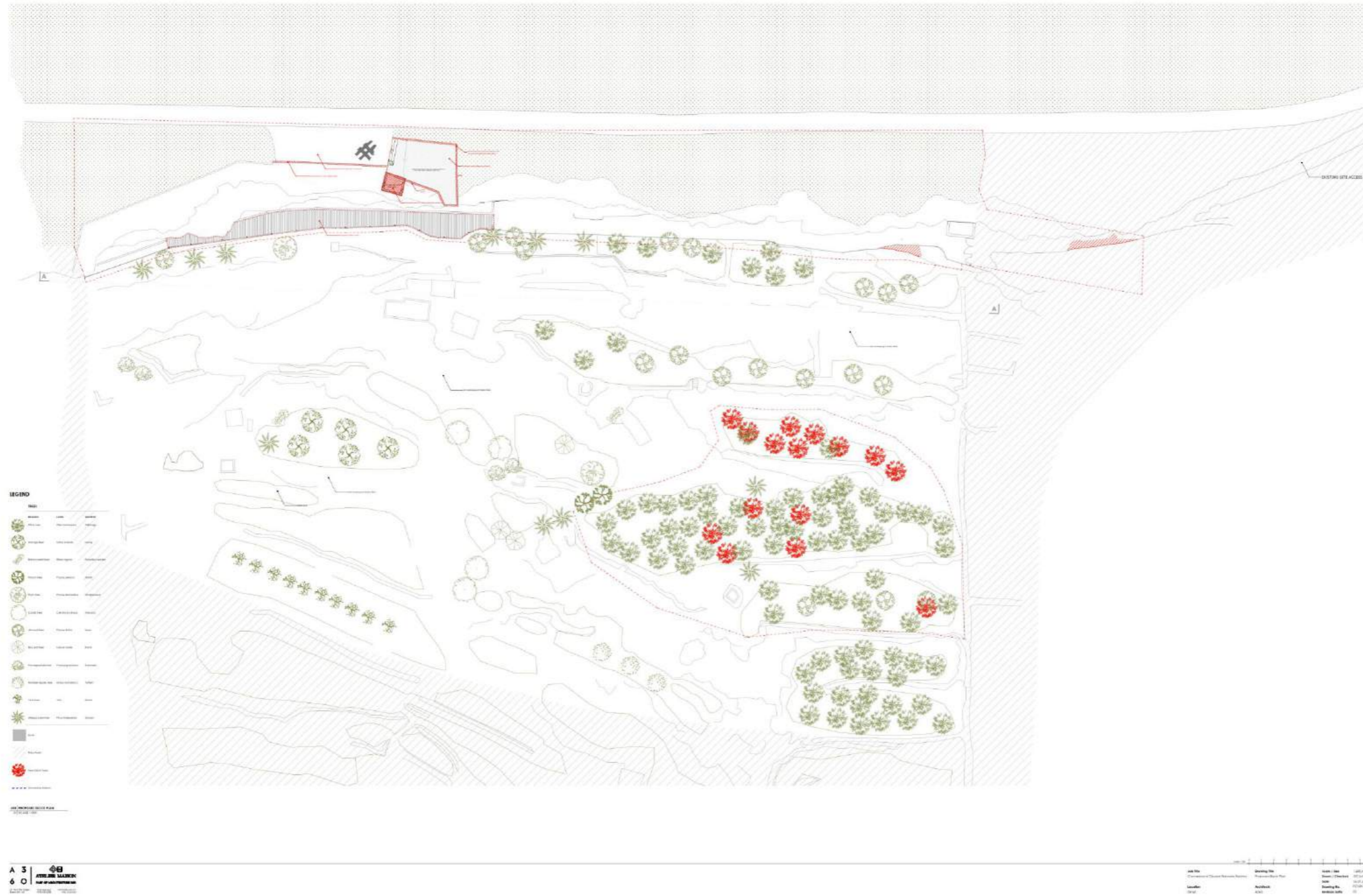


THE SCHEME

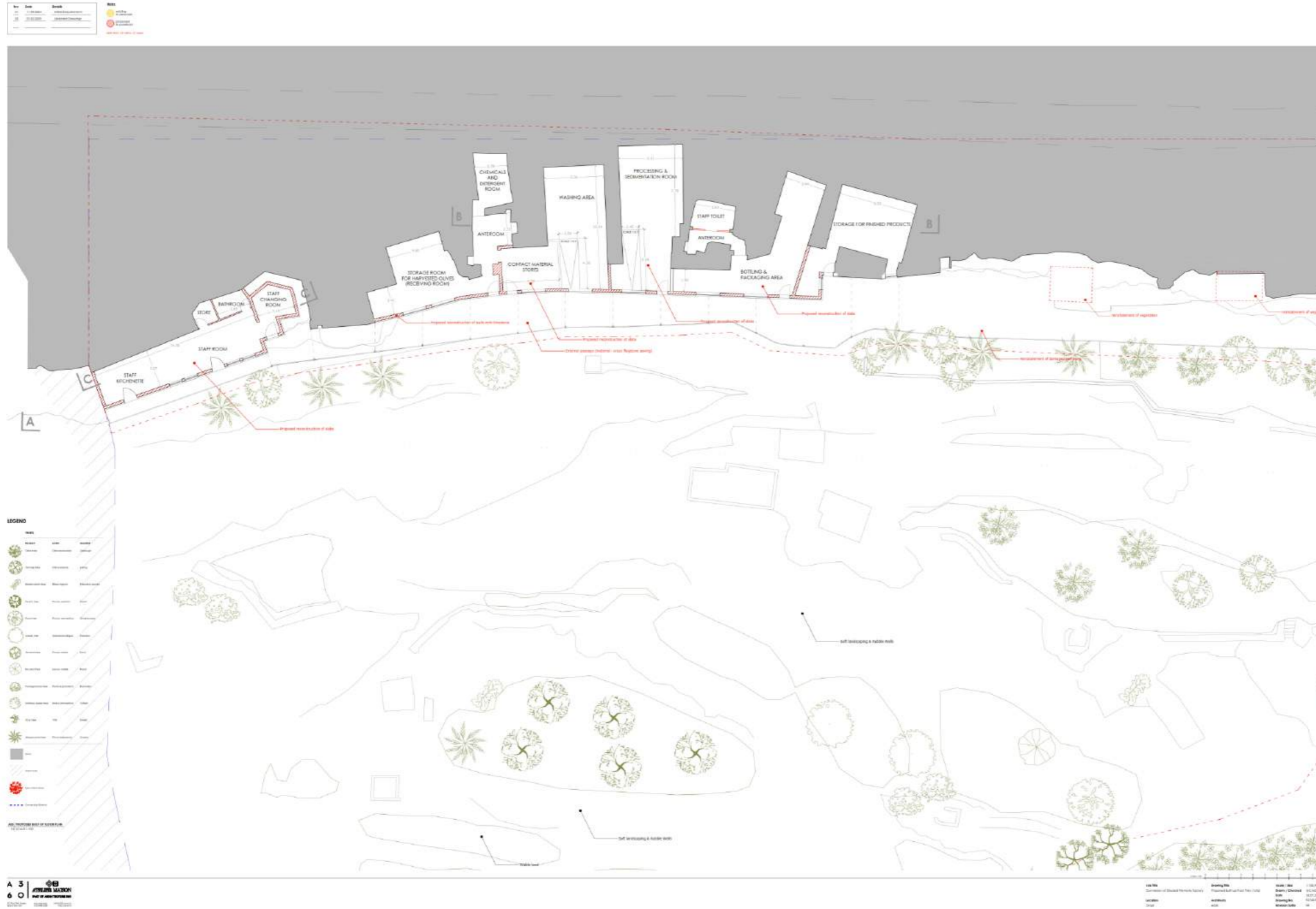
19. The fireworks factory ceased operations in circa 1988 due to the relocation of the factory to another site in Dingli. The closure left the property idle, with lack of proper general upkeep and structural maintenance, rendering most of the structures as dangerous and not fit for purpose.
20. The Scheme involves refurbishing the existing factory's infrastructure to accommodate olive oil production processes. This includes installing new machinery and equipment specifically designed for olive oil extraction, storage facilities for harvested olives, and packaging areas for the final product. Additionally, areas of the adjoining land will be utilized for cultivating olive trees. The Scheme also includes the re-use of some of the structures/rooms within the cliffs as agricultural stores as ancillary facility to the olive oil production, as well as to store equipment for agricultural and cultivation purposes, and staff facilities (see **Figure 9**).
21. The plans shown in **Figure 9** show the uses of the various rooms as well as the areas for reconstruction of slabs, reconstruction of limestone walls, crazy paving for external passageways, reinstatement of pathway, reinstatement of vegetation, and reconstruction of rubble walls at street level. The area for parking of vehicles is also shown.
22. One or part-of the stores will also serve as a retail shop for locally sourced produce, including any fruits, vegetables, and other agricultural products other than olive oil produced on site (see **Figure 10**). There are structures on Triq Panoramika, which were built years ago but are not covered by a permit, and the Scheme envisages the removal of these accretions (see **Figure 11**). The area will be cleaned, cleared, and reinstated to act as a drop-off/parking area for anyone visiting the olive-oil production facility. In addition, the existing steel structure that acted as a platform lift/winch to un/load explosives/material to and from the fireworks factory up to Triq Panoramika, will be dismantled and taken off-site to an authorised metal scrappage yard.
23. The existing buildings have a cumulative footprint and Gross Floor Area (GFA) of approximately 490 m² whereas the proposed structures have a GFA of 475 m². The parking area is approximately 113 m². The Scheme envisages no change to the footprint or to the building heights.

Figure 9: Scheme Drawings

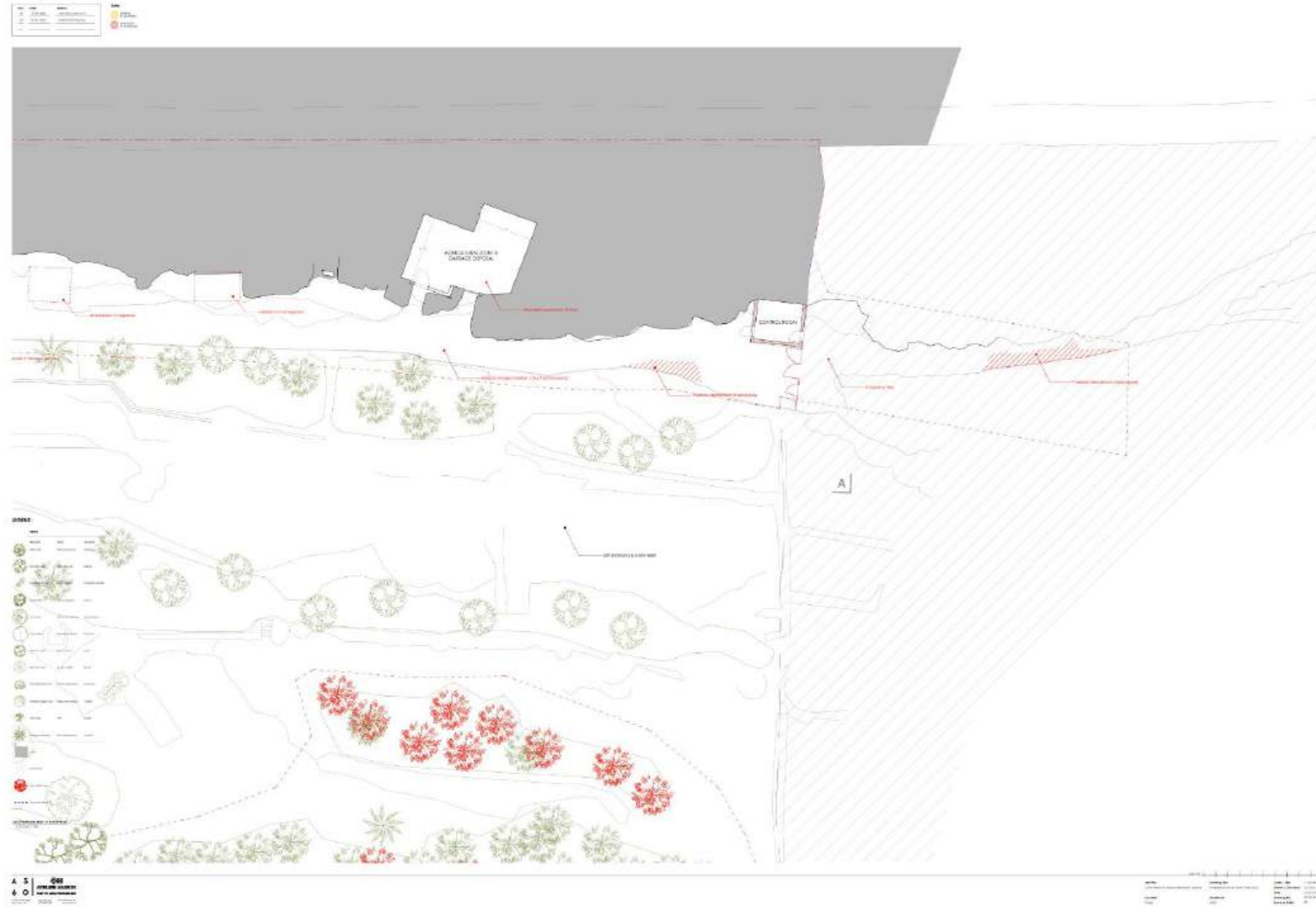
Proposed Block Plan



Proposed built up floor plan (I)



Proposed built up floor plan (2)

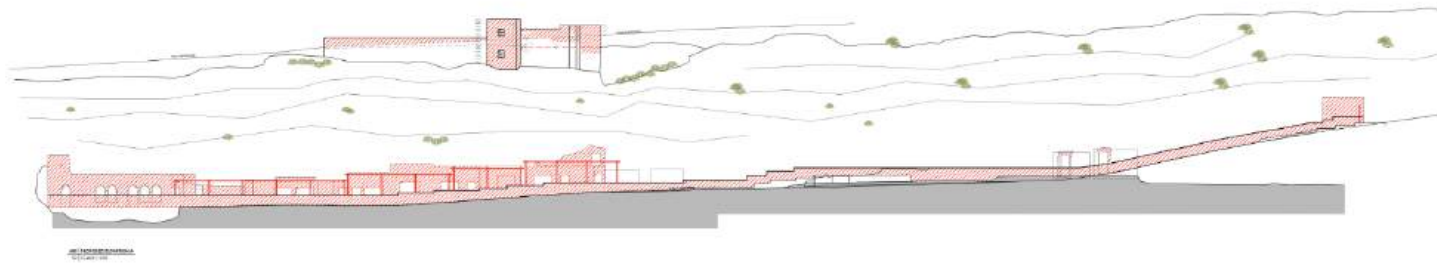
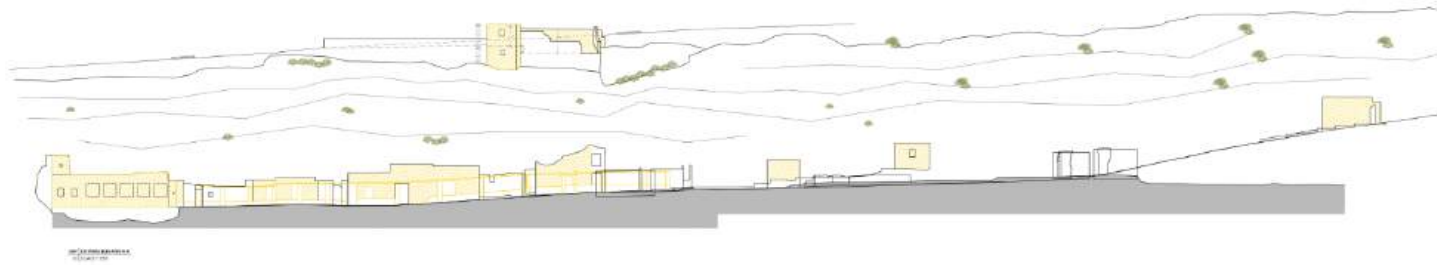


Elevation

Rev	Date	Description
01	08/11/2011	Initial Elevation
02	08/11/2011	Final Elevation

Color	Description
Yellow	Existing Building
Red	Proposed Building

- Notes**
- 1. All elevations are based on a mean sea level datum.
 - 2. Elevation is shown in feet and inches.
 - 3. Elevation is shown to the nearest 1/4 inch.
 - 4. Elevation is shown to the nearest 1/8 inch.
 - 5. Elevation is shown to the nearest 1/16 inch.



Rev	Date	Description
01	08/11/2011	Initial Elevation
02	08/11/2011	Final Elevation

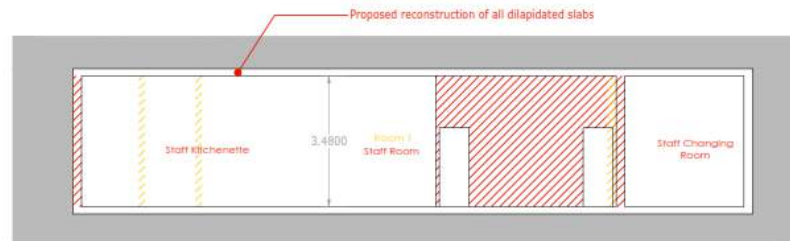
Section

Rev	Date	Details
01	07.02.2023	Updated Drawings

- Notes**
- existing to demolish
 - proposed to construct



PA10 | EXISTING/ PROPOSED SECTION BB
01 | SCALE 1:100



PA10 | EXISTING/ PROPOSED SECTION CC
02 | SCALE 1:100

A 3
6 0

ATELIER MAISON
PART OF ARCHITECTURE 860

30, Rue de West End, 1050 Brussels
Tel: +32 (0)2 734 1007
Fax: +32 (0)2 734 1008

100, Avenue de la Woluwe, 1200 Brussels
Tel: +32 (0)2 734 1007
Fax: +32 (0)2 734 1008

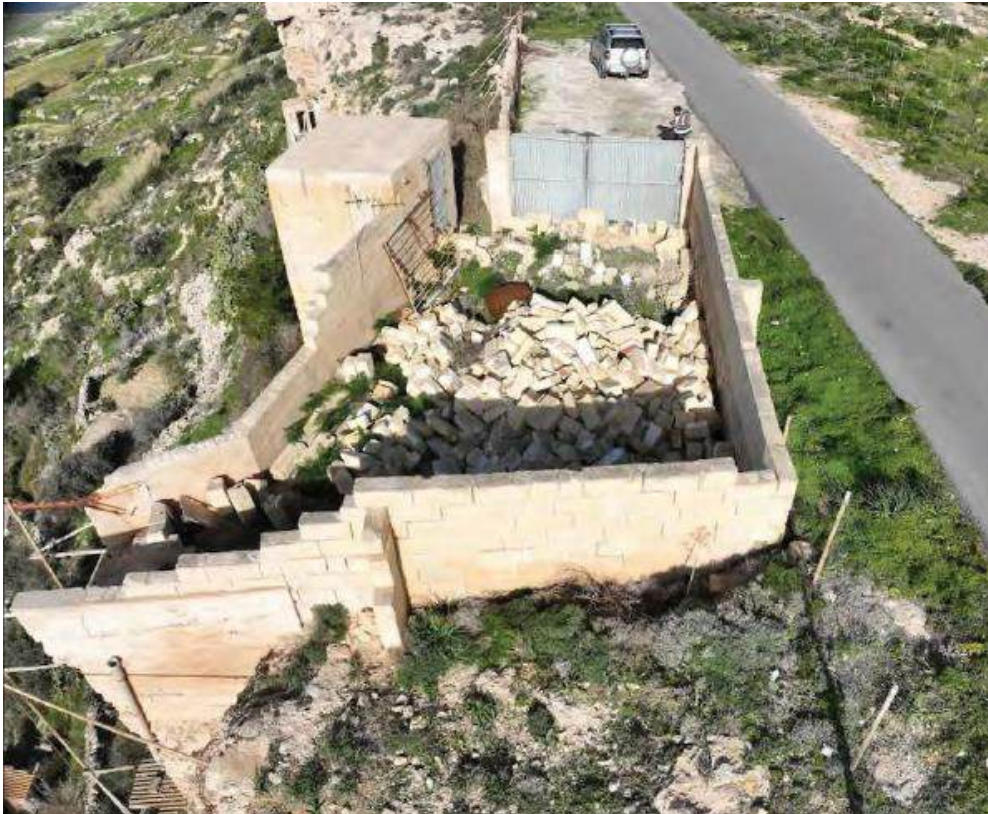


Job Title Conversion of Disused Fireworks Factory	Drawing Title Existing/ Proposed Section BB & CC	Scale / Size 1:100/A3
Location Dijl	Architects A360	Drawn / Checked LG/MC
		Date 27.08.2024
		Drawing No. P2734-PA10
		Revision Suffix 01

Figure 10: Aerial impression of the proposed retail shop



Figure 11: Illegal structures and steel lift/winch are to be dismantled and area reinstated



RESOURCES

Energy

24. Currently the site is not connected to the electricity grid, water provision and sewerage system, however, these services are available on a site approximately 200 metres away. Provisions will be made for these connections to be established on the site. No external lighting will be permanently installed.

Water

25. As described above there is no water provision on site and the nearest connection point is approximately 200 metres away. This means that infrastructure works will need to be carried out offsite to connect the Scheme to the water supply.

Wastewater

26. Wastewater will be collected in two cesspits. One will be constructed adjacent to one of the rooms, and the second will be located within the parking area within the cliff. The excavation is to be carried out carefully to the required depth and width. Both cesspits will be inspected for leaks, and final checks should be made to ensure compliance with the design and local regulations. These will be emptied by WSC accordingly.

Raw Materials

27. The Applicant explains that the raw materials include stone blocks / slabs and timber beams. Timber will also be used for apertures.

SCHEME CONSTRUCTION

28. Prior to the commencement of any works, the site will be rendered safe by installing adequate hoarding around the perimeter of the site on the road and the cliff face (where necessary). Any existing over-ground services/utility lines and/or any existing trenches/reservoirs that are running within and/or in the immediate vicinity of the site will be investigated.
29. The following works will be carried out:
- **Reconstruction of passageways:** steel fencing will be installed for safety purposes to act as a catchment for any loose material from the cliff. The lower part of the passageway will be cleared until safe and stable ground is reached, upon which a scaffold structure will be erected to facilitate its rebuilding. As for the second passageway, the supporting wall will be inspected, and any damaged or unsafe parts must be removed and carted away, including the slab (see **Figure 12**). The double-skin wall will be reconstructed and once completed, a shutter will be installed to support the new reinforced concrete slab as part of the passage. For the finish layer, a solid sub-base will be prepared to prevent movement and cracking over time, and a geotextile membrane will be installed beneath the sub-base to enhance stability and prevent soil migration. The area will then be levelled using well-compacted aggregate, ensuring adequate falls are

incorporated for proper surface drainage before the installation of the crazy paving.

- **Demolition of existing structures:** all existing walls, columns, slabs and apertures will be carefully dismantled. During the works, a crash deck will be erected to take the load of the demolished/dismantled material and equipment, where necessary, and will be done in a way not to damage the existing cliff face. Once slabs are demolished, all load bearing and non-load bearing walls will be dismantled by hand and material loaded onto small trucks and carted away. Once the dismantling process is complete, the reconstruction of the rooms can then commence. Minor excavation is envisaged for the cesspits and some foundations as required.
- **Reconstruction of rooms:** stone/concrete blocks will be lowered down to the site with a crane and/or a small truck through the passageways. All walls will be constructed according to the drawings and specifications as instructed by the project architect. At all times it will be ensured that the masonry walls are stable against wind loads and accidental damage given the site location. The actual placement of the individual bricks and stones will take place manually. The proposed slabs will consist of either a beam and block flooring system (concrete T-beams (travetti) supporting concrete blocks) or lightweight composite slabs.
- **Canopies:** the proposed canopies are required in front of certain doors to create an indoor-outdoor passage. The canopies will not span the entire passageway but will be installed only in areas with the highest foot traffic.

SCHEME OPERATION

Waste Management

30. The Scheme will generate primarily operational waste when it comes into operation, and the waste volumes will be relatively minimal given the scale of the Scheme. 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 of domestic waste. Wastewater will be collected in the cesspit as described above.

Employees

31. The Scheme is expected to employ three to four persons during the olive production season.

Figure 12: Passageway debris to be removed



POTENTIAL ENVIRONMENTAL IMPACTS

32. 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. At this stage in the process, a preliminary list of the potential environmental impacts from the construction and operation of the Scheme can be identified. The list identifies only those potential impacts that could be significant.
33. The potential significant impacts from the construction and operation of the Scheme are considered to be:

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

Since the current Scheme site is vacant, it does not generate any traffic. When operational, the Scheme has the potential to generate some additional vehicular traffic, in connection with both the olive oil production as well as the retail outlet staff, with implications for traffic emissions (noise and air quality), although these are unlikely to be significant given the scale of the development.

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

The Scheme site is mainly found below the level of Triq Panoramika and as such cannot be seen unless from the cliffs below the site and from the sea. Currently the buildings are in a state of disrepair and waste has accumulated on site. As illustrated in **Figure 13**, the proposed buildings have a traditional form and appearance and will essentially occupy the same footprint as the existing structures. However, the canopy is introducing a horizontal emphasis that does not currently exist.

- **Impacts from connection of services**

Since there are no services on site, these need to be brought in. The nearest supply is from a street just off Triq Panoramika so trenches must be dug for electricity and water supply.

Figure 13: Photomontages

Existing



Proposed



Existing



Proposed



Existing



Proposed



MITIGATION PROPOSALS

34. Preliminary potential mitigation measures associated with the identified impacts during the construction of the Scheme include:
- The buildings should better integrate with their surroundings and the horizontal canopy should be broken down so as not to introduce any horizontal elements. The colour and material of apertures needs to be carefully considered to blend them more with the surroundings. The upper building should be kept to the smallest size possible.
 - Establish clear construction boundaries to avoid damaging nearby habitats. Works are to be monitored to ensure there is no encroachment on sensitive areas. Manual clearance may need to be resorted to in more sensitive places.
 - Implementation of the Works Method Statement as approved by the Environment & Resources Authority.
 - Include measures during construction to prevent soil erosion and protect cliffside stability.
 - As much as possible, schedule construction during the dry season to minimize runoff.
 - Given the issues with cliff stability already prevalent on site, ensure that the Scheme is assessed from a geo-technical point of view and once works start they are regularly monitored by a geo-technical engineer.
 - Ensure that no external lighting is installed anywhere on site and that the facility does not operate after sunset.
 - During operation, especially during olive oil production, adequate infrastructure is in place to remove in a timely manner both solid and liquid waste.
 - Any noisy equipment is to be enclosed so as not to create disturbance to fauna in the area. No equipment is to be located (even temporarily) outside and no noisy equipment is to be kept switched on throughout the night. Any equipment which creates unacceptable noise levels is to be properly maintained or replaced to ensure that decibel levels at the Scheme boundary are within acceptable levels for avifauna and other sensitive fauna.