

**Application Number: TRK 160087 (EA 00003/16)**

**Location: Has Saptan, off Vjal I-Avjazzoni, Has- Saptan, Ghaxaq, Malta**

**Proposal: Demolition of existing structures and construction of fuel filling depot including ancillary offices, facilities and widening of access road.**

**5<sup>th</sup> April 2016**

Din I-Art Helwa does not agree that TRK 160087 (EA 00003/16) is not likely to have significant environmental effects. It should not be exempted from further studies and a full Environmental Planning Statement should be carried out.

In 12 of the 27 relevant issues identified by the PDS, the impact was marked as 'unclear'. This is not an adequate assessment and further studies should be conducted.

The site selection exercise is not satisfactory, as the proposed site is not an industrial site but is a rural area with agricultural, landscape, ecological and recreational value. The PDS notes that the proposed site may also have archaeological value, which further confirms its unsuitability. Sites which have already been excluded for valid reasons, such as Kordin or Ghar Dalam, should not be included in the site selection exercise. However the reasons for excluding the site at Benghajsa have not been adequately presented.

The relocation of the topsoil is also not a straightforward matter and must be studied in more detail, together with the proposed relocation of the trees and loss of maquis habitat.

The risks of fire and spillage also merit further consideration.

The South Malta Local Plan (SMLP), SMGH 03 promotes the use of the olive grove for informal recreation and does not allow the development of any built structures other than those that may support the use of the area as a recreational area, such as benches. It also requires that no lighting be installed at the Has-Saptan site. Policy SMGH 07 prohibits the expansion of existing uses at the existing Has- Saptan underground fuel storage installation and encourages the relocation of such facilities elsewhere.

In addition, the site lies within an area that either entirely or partly includes the following designations:

- Area of High Landscape Value (as designated through policy SMCO 04);
- Valley Protection Zone (as designated through policy SMCO 07);
- Aquifer Protection Zone (policy SMCO 06);
- Agricultural Area (policy SMAG 01);
- Proposed Area of Ecological Importance (AEI) and Site of Scientific Importance
- (SSI) (SMCO 03); and
- Archaeologically Sensitive Areas (policy SMCO 04).

Policy SMCO 07 and Policy SMCO 03 provide a presumption against development in these designated areas (Valley Protection Zone and Area of Ecological Importance/Site of Scientific Importance).