

## Robbing Peter to pay Paul



Enemalta is proposing to relocate its Birżebbuġa fuel storage and tanker filling facilities to its installation at Has Saptan, opposite the airport runway, and develop a further 6,600 square metres of land on site.

There is no questioning the urgent need to relocate the March 31, 1979, fuel storage installation and tanker filling facilities at Birżebbuġa, built in 1919, in view of their close proximity to the surrounding residential area. This is the legacy of bad planning practice, as the fuel handling facilities were there before the residential area was developed. Policy MB02 in the Marsaxlokk Bay local plan specifically lays down the need for this relocation.



But the need for the relocation does not justify the choice of the 6,600-square-metre site at Has Saptan, overlooking the airport runway, l/o Ghaxaq, that has been earmarked for the facilities. The site is neither already committed to development nor an industrial one, but rather an area of agricultural, landscape, ecological and recreational value.

The extensive project description statement (PDS) compiled for the proposed development admits that the planned relocation will entail the building of a new structure in an otherwise largely rural environment, which will have a major negative landscape impact on the area. The PDS also advises caution as the topography of the Has Saptan area suggests that the site could contain archaeological artefacts that would be obliterated if the project is given the go-ahead.

The foreseen ecological and agricultural impacts are perhaps the most serious as two-thirds (4,000 square metres) of the footprint of the proposed development at Has Saptan is on agricultural land. Enemalta proposes to mitigate this impact by removing the topsoil in the area and relocating the affected farmer to an adjacent 'disused' area.

I might have missed an essential detail but I believe the PDS for the planned development does not specify where this 'disused' site is, nor does it elaborate on its typology. By any chance, is the 'disused' site characterised by garigue (xagħri), which usually has a high ecological value but is normally looked down upon by the agricultural authorities? If this is the case, then this proposal is objectionable in principle.

The PDS for the proposal also flags the loss of protected trees, which would have to be uprooted to make way for the planned facilities, and the loss of maquis habitat that has established itself in the afforested site.

Enemalta has pledged to transplant all the uprooted trees and to plant in adjacent areas three times the number of trees it proposed to uproot. This is scant solace as such exercises normally result in a large number of trees dying, with few of the transplanted trees surviving and most of the new trees being much younger than those that would have been lost.

Perhaps more worrying given the woodland nature of the site in question is the risk of fire, which should not be underestimated, and the risk of spillage of petroleum products in the surrounding environment, as identified in the PDS. Enemalta promised to put in place a number of mitigation measures in this regard.

Enemalta also pledged to comply with a construction management plan to prevent the works from spilling beyond the proposed footprint into the surrounding woodland. Given the compliance track record of similar management plans of major projects in Malta, such as road works, I am very cynical of such statements. The chances are that there will be permanent mounds of rubble and construction debris beyond the periphery of the proposed facilities, resulting in further encroachment of the surrounding woodland.

*While residents' health should be safeguarded, this should never come at the expense of a further loss in woodland, agricultural land and recreational areas*

Policy SMGH 03 in the South Malta local plan 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 current use of the existing Has Saptan underground fuel storage installation and encourages the relocation of such facilities elsewhere.

In addition, the site lies in an area that either entirely or partly includes the following designations: an Area of High Landscape Value (as designated by policy SMCO 04); a Valley Protection Zone (as designated by policy SMCO 07); an Aquifer Protection Zone (policy SMCO 06); an Agricultural Area (policy SMAG 01); a Proposed Area of Ecological Importance (AEI) and Site of Scientific Importance (SSI) (SMCO 03); and Archaeologically Sensitive Areas (policy SMCO 04).



Protected, mature olive trees on site would have to be uprooted and there would be a much higher risk of fire in the surrounding woodland, a popular recreational area.

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, respectively).

In 2006, this same proposed relocation was said to be imminent, with the PN government of the day earmarking Has Saptan as a possible site for the facilities. Għaxaq and Gudja local councils, as well as Alternattiva Demokratika and most environmental NGOs at the time had vociferously objected to the relocation proposals at Has Saptan. One hopes that a similar groundswell of objections will be raised this time round.



Considering the multiple negative impacts of the proposed development and sheer scale of the plans, the mind boggles as to how a full Environment Impact Assessment (EIA) study was not commissioned so as fully identify and evaluate the anticipated impacts of such a large-scale development. An EIA study would also

allow a thorough investigation of sites other than the Has Saptan one, especially as it seems that to date only a superficial evaluation of alternative sites has been conducted.

The call for a full EIA study to be carried out on the proposed relocation is even more justified when one considers that in the impact summary document appended to the PDS, when it came to establishing whether any significant effects were envisaged, the commissioned consultants said they were 'unclear' in 12 out of the 27 issues raised. Common sense dictates that one should adopt the precautionary principle whenever there is a high degree of uncertainty.

Possible alternative sites include the committed sites of Corradino Hill, Wied Dalam and Bengħajsa, which seem to have been discounted without too much effort being made to investigate their suitability as the new site for the facilities. The justifications given by Enemalta for discarding the first two alternative sites seem to be legitimate.

In the case of Corradino Hill there is the proximity of the expanding Mcast facilities and the blanket prohibition on facilities handling fuels with a low flash point in the Grand Harbour; in the case of Wied Dalam the location is considered a sensitive valley.

However, I am not that convinced of the reasons given for the thumbs down to Bengħajsa; these include (a) that the site is not currently owned by Enemalta, (b) that its selection would entail the construction of extensive new pipework and (c) that existing operations on site (such as Oil Tanking) would result in an enhanced hazard factor (even though there are no nearby residential areas).

Enemalta would enhance its environmental credentials if it were to buy the site at Bengħajsa and invest in the necessary infrastructure. I believe this would be a legitimate price to pay in return for preserving the Has Saptan area.

The issue at stake is similar to the various cases of petrol station relocations which is resulting in a massive uptake of Outside Development Zone areas.

While residents' health should be safeguarded, this should never come at the expense of a further loss in woodland, agricultural land and recreational areas.

Will this be another case of déjà vu?

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