

Brincat Anna at Parlament-MT

From: Janina Laurent <Janina.Laurent@birdlifemalta.org>
Sent: Monday, 12 August 2019 11:42
To: Brincat Anna at Parlament-MT
Cc: Nicholas Barbara; Polina Venka
Subject: [EXTERNAL] - FW: Environment and Development Planning Committee Meeting - 05.08.19

Dear Ms. Brincat,

I would like to address the below e-mail to the Chair of the Committee of the Environment and Development Planning Committee with regard to your below announcement.

Thank you and best wishes,
Janina Laurent

Hon. Chairman,

Reference is made to Point 3 on the agenda of today's committee meeting "Policy Guidance for Fuel Stations - Public Consultation Document - 29th July 2019" which we have looked into, following also an earlier call for consultation, for which we have submitted our recommendations dated 10th June 2019.

Unfortunately we will not be able to attend today's session in Parliament, and with your kind permission would like to still table a few comments pertaining from the last consultation exercise, which were included in our original document, yet not taken on board in the last version of the guidance document.

- a) ODZ areas for development: We understand that in the last version of the document, there will be still the possibility that fuel stations are located within ODZ as long as these are not related to agriculture and animal husbandry and are within legally/permitted sites pre-1987. We feel this will still leave a loophole for the uptake of rural areas for the purposes of fuel station development, and would recommend against the development of fuel stations in ODZ areas.
- b) Buffer zones to important sites: We feel that the 100m and 50m distances to important sites such as ecologically or scientifically important areas, do not do justice to the protection of natural resources. We recommend that at least a 400m distance to protected sites (including Natura 2000) is considered.
- c) Exterior lighting scheme: The policy document leaves the onus of adequate lighting scheme installation on the Planning Authority. We recommend that such lighting limitations are annexed to the document to provide a suitable guidance on the matter. Light pollution is a matter that affects both human and wildlife, especially in areas currently exposed to very limited artificial light sources. Especially in undeveloped areas, there needs to be a guarantee that the development will not contribute to increase light pollution and should avoid light spillage, glare or light cast overuse.
- d) Noise pollution: The development of fuel stations will bring a source of noise pollution as a result of the services a station offers, and the services it would need. Whereas the relative impact from the installation of a new fuel station would be assessed through an Environment impact assessment, it is recommended that guidance is included and adhered to. The guidance document does not regard noise pollution, and there could be ample measures adopted to reduce it – such as timing services of waste collection, refrigeration, air conditioning and refueling of tanks. Infrastructure or practical measures in the design of such fuel stations could make a huge difference in abating noise that would be produced from a fuel station (e.g. landscaping)

We appreciate that these comments will be considered during the meeting in our absence.

Thank you and best wishes,
Janina Laurent