



Comments on Planning Applications 07807/16 Relocation of Kerb-side Fuel Station and Ancillary Services to Site at Triq LImdina, Attard
22 May 2017

- The development proposal is situated in ODZ land, proposed to be developed on Land of Agricultural Value (NWAG 1 Map). This goes strictly against the North West Local Plan, in section 13.9.2, where it is stated that the decline in available agricultural land is a serious threat to the quality of landscape in the region of the proposed development. Rural Objective 1 of the SPED, 2015, furthermore aims to facilitate sustainable rural development and the diversification of activities within the Rural Area to sustain agriculture and safeguard its distinctiveness by protecting good quality agricultural land from development. Accordingly a review of applicable policies in an EPS should determine this development to be a non-starter.
- Several protected trees (*Pinus halepensis*) will be negatively affected by the proposed development, leading to a complete destruction of such trees. This is a direct threat to the islands' biodiversity and natural heritage. The trees also form part of a tree-lined avenue along the street, chopping them down would be further to the ecological damage impact the visual landscape value negatively. An ecological impact assessment and a landscape impact assessment should also result in the development to be considered negatively.
- Two petrol stations are already located on this road (Pit Stop Service Station and Fritz Energy Limited) offering sufficient provision of Liquefied Petroleum Gas and additional car services for the area. The concentration of these service stations in close proximity to each other may pose a threat to environmental and human health. Additional risk of fire from neighbouring agricultural areas could also be a serious concern. A fire risk assessment should at the very least highlight the risks with developing this proposal.
- The Fuel Service Station Policy, 2015, determines in paragraph 5.4 that "New or Upgraded Fuel Stations or Relocated Fuel Stations within a 500m distance of an Existing Petroleum Filling Station, in the same direction of traffic should not be permitted". The Pit Stop Service Station located on the same road in Northeast direction (approx. 550m distance) provides a turn to enter the station right after the roundabout. The necessity for locating another station in such close distance is thereby highly questionable, also regarding competitive disadvantages for the existing facilities.

The proposed development does not apply to these regulations and breaches the above-mentioned legally binding documents, causing a threat to Malta's natural environment.

BirdLife Malta appeals to ERA and PA to:

- Justify the need for having further petrol stations in an area which is already adequately serviced by other existing petrol stations
- Object to this development which is located in ODZ, is in breach of above highlighted policies, and appears to be unnecessary given the fuel service stations that already provide a service in the area.