

Comments on the Review of the 2015 Fuel Service Station (Phase 2)

10 June 2019

As part of the open public consultation process on the Review of the 2015 Fuel Service Station Policy, we would like to highlight the following points as recommendations to be included into the policy based on our interest to safeguard Malta's natural environment and social wellbeing.

Buffer Zones

Fuel stations should not be built within 400-meter distance to Natura 2000 sites or sites and areas designated for nature and landscape conservation under the Environment Protection Act, including but not limited to Special Areas of Conservation, Special Protection Areas or Tree Protection Areas. Leakages from underground petroleum storage systems as well as spills from structures above the ground pose significant threats and impacts on soils and groundwater. In case of such spills an immediate threat leading to site contamination and safety implications is posed on the surrounding areas. Fuel stations proposed on land directly above or in close distance to main groundwater bodies need to undertake Environmental Impact Studies to eliminate risks of contamination. We recommend undertaking a buffer zoning exercise based on grades of sensitivity of the protected and scheduled sites. Fire work factories and sites of risk of explosion should be included into the buffer zoning exercise, as 100 meters is a too short distance to guarantee safety.

Distance between fuel stations

The distance between fuel stations is mentioned in the beginning of the policy, however, an exact distance is not stated further down in the document. This is a major weak point of the proposed policy due to the occurrence of numerous proposed and pending fuel station planning applications at the sites that are very close to one another in the recent past. A model needs to be developed that calculates the need for fuel stations in Malta based on their future demand. In accordance to government's objectives to reduce road traffic and create a shift to electric vehicles by 2050 it is necessary to adjust fuel supply which will inevitably decrease. The policy should first establish the anticipated growth of vehicle traffic, and model how many fuel stations are needed from now until a set year. Policy should effectively allow for a certain number of fuel stations to be operative at any one time as guided by the policy. This would prevent unnecessary sprawl of stations in ODZ areas, and limit expectations from developers.

Light and noise pollution

Integrated fuel and service stations may operate twenty-four hours per day, seven days per week and may comprise light pollution that creates disturbance to the natural environment and wildlife. The design of lighting at fuel stations need to be adjusted to limit light pollution, especially in areas that are currently exposed to very limited artificial light sources. This is particularly important in Malta due to the current trend of relocating fuel stations from urban



areas to the outskirts of city boundaries, rural areas and Outside Development Zone. The design of lighting needs to guarantee that there is no light spillage, glare or light cast overuses to areas surrounding the site. White light needs to be prohibited to be used especially during the night in non-urban sites and replaced with yellow light and only face downwards. This can be achieved for instance by installing light bulbs underneath the canopy as it provides sufficient light for using the fuel station. Light should not be used to attract attention to the fuel station provider for business purposes but rather limited to safety and security of the fuel station. This includes that the sides and top of the canopy should not be illuminated. As recommended in the Best Practices for Effective Lighting guidelines¹, the average horizontal illuminance under the canopy should be no more than 10 lux, with a uniformity ratio no greater than 3:1 and where safe enough, motion-sensing activation should be applied. Additionally, we would like to make reference to EU standard EN 12464-2:2007 Lighting of work places - Part 2: Outdoor work places that includes a section on parking areas. These standards should be included in the Fuel Station Policy.

Fuel stations can create various noise sources including truck and car movements, fuel deliveries and rubbish collection, operation of fuel pumping equipment, refrigeration and air conditioning plant, vehicle wash bays and vacuuming facilities. It is important to minimize noise caused by these sources during the night by prohibiting respective services, mitigation measures such as noise-reducing infrastructure must be included in the development plans.

¹ Bird-friendly development guidelines (2017) Best Practices for Effective Lighting. Toronto Green Standards, Toronto, Canada