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**Comments on the *Project Description Statement: Proposed sites for Civic Amenity Facilities***

1. Xewkija Local Council has requested comments on WasteServ Malta Ltd, *Project Description Statement: Proposed sites for Civic Amenity Facilities*, Malta, November 2003. This report was sent to the Council by the Malta Environment and Planning Authority for the former's comments. The *Project Description Statement* had reached the Local Council in March 2004.<sup>1</sup> On December 2003, WasteServ Malta Ltd has submitted an outline application for a Civic Amenity Facility at Ta' L-Imghajjen, Xewkija, Gozo, bearing number PA 7236/03. The following are a number of comments on the *Project Description Statement*. Once a complete version of the *Project Description Statement* is received, a formal Technical Note will be submitted.<sup>2</sup>
2. The *Project Description Statement* confirms the position of Xewkija Local Council stated in the correspondence of February 2004 to the Director of Planning in response to the outline application PA 7236/03, that is  

Xewkija Local Council would like to object against this proposed development for a number of reasons. These include the main objectives of the *Structure Plan For The Maltese Islands*, land use policies contained in the Local Plan for Gozo and Comino prepared by the Malta Environment and Planning Authority and other policies and recommendations included in other public documents such as the *Waste Management Subject Plan for the Maltese Islands*.

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<sup>1</sup> The covering letter of the Planning Directorate dated 25<sup>th</sup> February 2004 and received at the Local Council on 2<sup>nd</sup> March 2004, states that in accordance with Section 36 of the *Development Planning Act*, 1992, the Council had 30 days to send its comments to Malta Environment and Planning Authority. If no comments were received by that date, the Malta Environment and Planning Authority assumes that the Local Council has no objection to the proposed development.

<sup>2</sup> The *Project Description Statement* has the following sections missing: pages 32, 33 and 34 and Appendices B to F.

Xewkija Local Council, although confident that no strategic environment assessment was undertaken to assess the proposed development, urges the Malta Environment and Planning Authority to abide by its own policies and the position taken by other agencies together with directives which Malta has to abide by including environmental and health and safety ones.

3. The *Project Description Statement* is a common report for the proposed seven Civic Amenity Facilities in Malta and Gozo and covers the following eight sites: Ta' L-Imghajjen in Gozo, Mgarr, Hal Far, Ta' Qali, Bulebel, Marsa, Imriehel Site A and Imriehel Site B. Reference is made to Table 1 of these comments on notes on each site as briefed in the *Project Description Statement*. Due to the generic nature of the *Project Description Statement*, some of the comments contained in this submission are collective to all the sites while some are more specific to the Ta' L-Imghajjen site.
  
  4. The *Project Description Statement* has a number of shortcomings:
    - (i) it fails to tackle The Development/EIA process in Section 1.1, unlike what is stipulated in Table 1 of the *Project Description Statement*.
    - (ii) In Section 1.1.1, the text does not reflect the title in that it is not a technical summary of the report's contents.
    - (iii) In Sections 1.1.1 and 4.1.1, it is stated that one civic amenity will be set up in Gozo whereas later on in the same section and in Section 4.3, it is stated that two facilities will be set up.
    - (iv) No alternative uses for the selected sites were forthcoming, unlike what is stipulated in Table 1 of the same report. The description of the current land use of the site and the surrounding land is hefty and incomplete and at times even absent, especially for the surrounding land.
    - (iv) There is no reference to production processes and operational methods as stipulated in Table 1 of the same report. Moreover, there is absolutely no means of reference to alternative methods of waste disposal.
    - (v) The reference to overseas practice in Section 2.3 is certainly not exhaustive and a more thorough study is required to come to a more economically viable solution. The imposition of a service charge may well induce a much lower recovery rate than that stipulated in section 2.2.4.
    - (vi) Section 2.1 fails to emphasise the economic objective of the proposed
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development, as stipulated in Table 1 of the same report. This is further ignored in the section dealing with the economic viability of the project (Section 2.3): the only premise is that the projects will be wholly Government owned, but unlike overseas facilities, the proposed amenities will be wholly self-sufficient through the imposition of service charges to the server. It is only the environmental objective that is being emphasised, namely the waste management facilities as the best environmental option (Section 2.2.2).

- (vii) In Section 4.1 there is no reference to phasing of the development as stipulated in Table 1 of the same report.
- (viii) There is no reference to services required for the development as stipulated in Table 1 of the same report.

5. At times, the Civic Amenities are referred to as “large household recycling facilities, or CA facilities...” (Section 2.2.2) where only “a variety of household wastes” will be collected (Section 1.1.1), whereas in Section 4.1.1, they are referred to as facilities...for the receipt of household wastes and primarily bulky wastes, source segregated recyclables etc for ultimate recovery and recycling activities and as necessary final disposal to landfill.

In Section 4.1.2 Civic Amenity is defined as a

a supervised centre to which members of the public can bring and discard a variety of household wastes against a small fee. Such wastes typically include

- Bulky items such as furniture.
- White goods such as refrigerators and freezers.
- Electrical and electronic goods.
- Recyclable materials (paper/board, bottles, cans, etc).
- Green garden wastes.
- Wastes from minor construction, building maintenance and DIY activities.
- Hazardous household wastes e.g. paint, garden chemicals, spent dry cell batteries, used sump oil, obsolete drugs, etc.

Clearly there is no reference to industrial, agricultural or commercial waste, even if source segregated<sup>3</sup>. This ambiguity is further compounded by Table 6 of the same report (Section 4.2.1) which sets the Project Design Criteria. Under the Project Parameter ‘Waste types’, the Design Criteria was largely unspecified and set as Wastes, including hazardous wastes, delivered in small quantities.

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<sup>3</sup> In the case of Hal Far and Ta' Qali (*Project Description Statement*, pp. 18, 19), it is stated that industrial, agricultural and commercial waste will also be collected.

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If the definition of civic amenities is wider than just collection points of source segregated household waste, but includes also commercial, agricultural and industrial wastes. This should have been made clear in The Project Objectives of the *Project Description Statement* (Section 2.1).

6. In Section 4.2.1 it is stated that

Wastes will be segregated and accumulated at the facility and then periodically removed for subsequent recovery/recycling, treatment and disposal.

Therefore to refer to the proposed Civic Amenities as Materials Recovery Centres is misleading, but collection and storage points is more adept.

Again, in Section 4.3.2 it is stated that

All wastes removed from the site will be taken to the appropriate licensed facilities for subsequent recovery, treatment and/or disposal.

7. No reasons/factors are given as to why the given sites were selected and it is highly unclear why were vacated industrial blocks ignored completely when they are inherently enclosed spaces, ideal for waste collection points, and land availability was considered to be a main factor.

In Section 3.1, it is stated that the site selection exercise

is an ongoing process primarily in liaison with the Maltese Environment and Planning Authority (MEPA). Prospective CA facility sites are identified as part of the Local Plan development and review, taking into account the various land-use and planning policies relevant to the waste management sector as well as to the specific areas in question. These factors include:

- A site area of between 2,000 and 7,000 square metres.
- The site should be derelict land either close to an informal or within existing industrial sites or on land previously used for waste disposal or minerals development or on degraded land outside but adjacent to the Limits to Development boundary
- The development of the site should not create significant adverse impacts on existing surrounding land uses...

If timeframes are so tight, how come the site selection exercise is ongoing (Section 3.1)? The *Project Description Statement* was supposed to be the report to propose the sites for these Civic Amenities in a collective manner.

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The unsourced Table 7 (Section 4.2.2) of the *Project Description Statement* states the Main Technical Requirements for the development and operation of a Civic Amenity Facility. Under the heading Site Location, the requirements are

- Distances from residential and recreation areas, waterways, water bodies and other agricultural and urban sites
- The existence of groundwater, coastal water or nature protection zones
- Geological and hydrogeological conditions of the area
- Risks of flooding, subsistence, landslides or avalanche[!!!]
- The protection of the natural or cultural patrimony of the area

A CA facility can be authorised only if the characteristics of the site with respect to the above requirements, or the corrective measures to be taken, indicate that the facility does not pose a serious environmental risk.

In the concluding section of the report, Section 5, it was stated that

A considerable amount of time was taken to find appropriate locations for these sites. This is because all sites must comply with specific requirements. The sites being examined in this document aim to be of service to as many locations as possible and for different users without causing any inconveniences. The suggested sites also aim to be of no harm to the immediate surrounding environment and, when possible, will be using derelict land.

8. In Section 1.1.2, reference is made to Policies in *The Waste Management Subject Plan*<sup>4</sup> notably SWM 1, 2, 4, 8 and 12, with emphasis on 8 and 12. Policy SWM 4 stresses the proximity principle of such facilities and Policy SWM 12 states that such facilities should be “suitably located”. It is emphasised in the report that all the suggested sites are central. Although one can easily contend on such a premise, one has to assume that WasteServ Malta Ltd underwent a thorough site selection exercise, albeit this assumption falls short when one studies Policy SWM 8 which emphasises that the selected site<sup>5</sup>

is located within an existing industrial site or on land which is permitted or allocated for industrial or similarly related development; or  
on land previously used for waste disposal or minerals developments;...

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<sup>4</sup> Malta Environment and Planning Authority, *Space for Waste: The Waste Management Subject Plan*, Malta, October 2001.

<sup>5</sup> It is to be noted that, with the exception of the Marsa site, none of the proposed sites are located within an industrial site or land permitted for industrial development. Notably, almost all of the sites are located in the vicinity of industrial sites, but they themselves are agricultural land (Table 1).

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It is noteworthy that only the *South Malta Local Plan* has ad hoc policies on such civic amenities; *Gozo and Comino Local Plan* was issued in June 2002, a number of months after *The Waste Management Subject Plan* had been issued.

9. In Section 3.1, it is stated that the *Gozo and Comino Local Plan* was taken into consideration when selecting the Ta' L-Imghajjen site. However, the site has a number of considerations, stated in terms of the map reference number of same, namely:
- a) site is adjacent to the Gozo Stadium (Map 14.13-A);
  - b) site is in the vicinity of a Category 2 Outside Development Zone conglomerate of residential units (Maps 4.2.10 and 14.13-A); in the explanatory paragraph to Policy GZ-RLST-2, it stated that  
A policy for development in Category 2 settlements seeks to reach a balance between allowing consolidation of these settlements through restricted growth but to protect their rural character by preventing development which will adversely affect those intrinsic features of the settlement.
  - c) site is in the vicinity of an afforested area (Map 13.4);
  - d) site is in adjacent to a watercourse (Map 13.1-A);
  - e) site is in the vicinity of Xewkija Industrial Estate (Map 14.13-A).
  - f) the adjunct road is being proposed as a walking route (Map 10.3.3) and a panoramic route (Map 13.1B); and
  - g) the land within the site is considered as land of agricultural value (Map 11.2) whereas in the *Project Description Statement* it is described as derelict land.
10. In Section 3.1, the site area and land availability are stated as being important decisive factors in the site selection exercise.<sup>6</sup> It is highly unclear why large tracts of land are being selected when it is being stated that much less will be used. In Section 4.2, no explanation was given as to why the generic plans were based on

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<sup>6</sup> In this section it was stated that

The availability of land is clearly of critical importance in the shortlisting of suitable sites for CA facilities. Hence, MEPA have indicated that land under Joint Office ownership was assessed as availability and potential use as CA facilities.

In Section 4.3, it is stated that

It is envisaged that each of the CA sites will take up an area of between 0.4-0.7 hectares.

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site areas of 0.4 to 0.7 ha. Does the area(s) reflect the amount of daily waste inputs of 25 tonnes (Table 6, Section 4.2.1)?

11. Policy SWM 8 of Malta Environment and Planning Authority, *Space for Waste: The Waste Management Subject Plan*, Malta, October 2001, states that

MEPA will support proposals for the provision and erection of plant and building for the recycling, transfer, storage and other treatment or handling of waste provided that:

(ii) the proposed site is located:

...at a waste management facility provided that the proposed development is connected with the waste management operation and is for a temporary period commensurate with the operational life of the existing facility; ...

Does this imply that most of the proposed sites, including that at Ta' L-Imghajjen, will in future end up as "temporary" landfills/storage sites for wastes? This proviso is further underlined by Table 9 of the *Project Description Statement* where a total volume of waste is envisaged for a typical Civic Amenity of size 5000m<sup>2</sup>, whereas for a larger 7700m<sup>2</sup> at Ta' L-Imghajjen, only 493.44m<sup>2</sup> of total waste volume is projected; it is stated in the same Table that "less than this area will be utilised".

12. The unsourced Table 7 (Section 4.2.2) of the *Project Description Statement* states the Main Technical Requirements for the development and operation of a Civic Amenity Facility. Under the heading Water Control and Effluent Management, it is stated that

Measures must be taken to prevent ingress of surface water and control the effect of precipitation.

Any contaminated liquid must be collected. If an assessment based on the location of the waste transfer facility and the waste to be accepted shows that the facility poses no potential hazard to the environment, the competent authority may consider that this requirement does not apply.

In the generic plans such measures are not clearly indicated and in Section 4.3.1, it is stated that

There are no special needs for site drainage beyond a simple petrol/oil/grit interceptor at the point(s) to which surface waters drain prior to discharge off site.

However, later on in the same Section, it is stated that

The wastes delivered to this facility will take a wide variety of forms. The potential for pollution is therefore high as the containment of some materials upon delivery

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may be inadequate and some wastes may be intrinsically dangerous.

The principal means of minimising the risk of pollution will be to provide an effective means of temporary containment...Local spillage will be dealt with operationally.

Therefore these potentially dangerous wastes will only be tackled by operational measures only, using (Section 4.3.2)

anti-spillage absorbent granules or ropes to contain oil or chemical spills.

Still it was seen as necessary to provide means, although unspecified (Section 4.3.2)

to handle leaky containers containing small quantities of potentially hazardous materials.

In Section 4.3.4 it is stated that

...under these containers an impermeable platform will be provided in order to control any discharges from the waste material.

At no point is protection from precipitation mentioned. It is only alluded to when in the same Section it is stated that

Drainage of surface water will be to a simple interceptor before discharge off site, in order to prevent grit and oil/grease from polluting the external drainage system.

In Section 4.3.4 it is stated that

Measures will be taken in order to prevent the ingress of surface water and control the effect of precipitation.

13. Unlike what is stipulated in Table 1 of the *Project Description Statement*, no technical standards and specifications are set down, although it is stated that such facilities will be designed and operated (Section 4.2.2)  
using best practice and widely accepted technical standards and specifications.
  14. Do the parking facilities as presented in the generic plans cater for "Up to 1,000 vehicles per day (weekends)" (Table 6, Section 4.2.1)?
  15. The proposed waste management system is being encouraged because  
Currently there are two on-going pilot projects rendering encouraging results of captured and recovered waste fractions.  
None of the results were forthcoming.
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16. The proposed timeframe in Section 2.4 undermines public consultation processes. The Malta Environment and Planning Authority has emphasised the need for public consultation from the concept stages of projects till their completion. In the proposed timeframe, the public consultation, if any, is concurrent with the tendering and award of the works contract, concurrent with the planning process, that is until end 2003; the construction of the proposed facilities is also planned to start simultaneously, that is end 2003.
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Table 1: Notes on Selected Sites

| <i>Site / Factor</i>                   | <i>Ta' L-Imghajjen</i>  | <i>Mgarr</i>        | <i>Hal Far</i>   | <i>Ta' Qali</i>   | <i>Bulebel</i>                                    | <i>Marsa</i>   | <i>Imrieheh A</i>   | <i>Imrieheh B</i>   |
|--|---|---------------------|--|---|---|--|---|---|
| <i>Area (m<sup>2</sup>)</i>            | 7,700   | 650                 | 7,000  | 20,000 (2,500)  | Unspecified                                       | 1628   | 8530  | 4400  |
| <i>Land Ownership</i>                  | Government owned  | Mgarr Local Council | Government owned currently leased to Malta Industrial Parks  | Government owned  | Unspecified, probably Government owned            | Government owned, part of the Cleansing Services Department  | Partly private, partly Malta Industrial Parks                       | Joint Office  |
| <i>Description of Site</i>             | Disused; some trees of no agricultural or ecological importance | Derelict            | Covered in weeds.  | Agricultural land   | Part of a road                                    | Former Refuse Disposal Centre; derelict land with some trees | Derelict land   | Agricultural land   |
| <i>Description of Surrounding Land</i> | Trees   | Agricultural land   | An area used by the Government Bonded Stores; area outside the industrial and recreational area but in the vicinity of both. | Agricultural land   | Agricultural land                                 | Parking area for scammels; waste disposal point              | Mrieheh Industrial Estate   | Mrieheh Industrial Estate with commercial and agricultural activities |
| <i>Catchment Area</i>                  | Gozo: 31,268  | Mgarr: 2,919        | B'bugia, Freeport, Hal Far Industrial Estate, Hal Far Recreational Park  | Mosta, Attard, Rabat, Mtarfa, Zebbug, Pitkali, Ta' Qali hawkers: >52, 592 | Ghaxaq, Zejtun, Tarxien, Sta Lucia, Fgura: 39,776 | Qormi, Hamrun, Msida, Sta Venera, Marsa: 44,299              | San Gwann, Msida, Hamrun, Balzan, Attard, Qormi, Sta Venera: 99,828 | San Gwann, Msida, Hamrun, Balzan, Attard, Qormi, Sta Venera: 99,828   |
| <i>Access</i>                          | Secondary road leading to main road                             | Main road           | Main road  | Main road, however road used by Pitkali customers                         | Part of a road itself                             | Main road  | Secondary road  | Secondary road  |

Source: WasteServ Malta Ltd, *Project Description Statement: Proposed sites for Civic Amenity Facilities*, Malta, November 2003, pp.16-23.