



STRATEGIC ENVIRONMENT ASSESSMENT
STATEMENT OF ADOPTION

JULY 2015



1. Purpose of this report

1.1 This document (hereafter referred to as the SEA Adoption Statement) has been prepared in line with the requirements of regulation 10 of the SEA Regulations (L.N. 497 of 2010). This report

- Sets out how all comments made by the identified stakeholders and the public were or were not taken on board and integrated in the Environment Report
- Indicates how environmental considerations and the Environmental Report were integrated into the plan and
- Identifies any monitoring measures that will be adopted during the implementation of the SPED.

2. Background

2.1 The Environment and Development Planning Act of 2010 (EDPA) requires the preparation of a Strategic Plan for the Environment and Development (SPED) to be based on an integrated planning system that regulates the sustainable use and management of land and sea resources.

2.2 The SPED replaces the previous Structure Plan (which was published in 1990 and adopted in 1992). It provides a strategic spatial policy framework for environment and development up to 2020 complementing Government's economic, social and environmental objectives for the same period. The SPED covers the marine waters up to the extent of 25 nautical mile limit of the Fisheries Conservation Zone (adopted by Council Regulation EC No. 1967/2006).

2.3 The SPED regulates the spatial use of the Maltese Islands' land and maritime territory up to 25 nautical miles and reflects Government policy direction identified in current Government plans, programmes and policies. It integrates the spatial component of the same plans, programmes and policies and guides the formulation of new ones, in particular those related to development planning and the environment with respect to use of land and maritime territory.

2.4 The SPED is not the main tool to implement Community legislation on the environment. In providing an integrated framework to guide the spatial allocation for development in accordance with government plans and policies it supports the implementation of the respective plans prepared specifically to fulfil the obligations of Community legislation on the environment.

2.5 SPED was prepared following an analysis of Government Policy and extensive consultation with Ministries and Government entities. This process resulted in a comprehensive assessment of the thematic and spatial issues that influenced the Plan and could also be tackled through spatial planning. The thematic issues, Socio-economic Development, Environment, Climate Change and Travel Patterns, are cross-cutting and affect all sectors of our economy, quality of life and the status of the environment. The spatial implications and linkages between these thematic issues are also discussed within the Maltese Spatial Structure namely Urban Area, Rural Area, Coastal Zone and Marine Area and Gozo.

2.6 The Vision of the SPED reflects the long term aspirations for sustainable development in the Maltese Islands. In particular, it recognises that the sustainable use of land and sea resources depends on the efficient use of available space together with effective protection of the islands' natural and cultural resources. The Vision provided the impetus for SPED's thematic and spatial policies which were developed on the basis of the following key guiding principles for the sustainable management of the territorial space of Malta and Gozo:

- the bulk of development is directed to the Urban Area with the aim of consolidating it within a spatial hierarchy whilst improving further the liveability of towns and settlements;
- the Rural Area is promoted for agriculture and diversification in support of farming activity in addition to protection and management of the natural and cultural resources that give it its distinctive qualities; and
- a planning framework to integrate socio-economic growth and environmental management within the Coastal Zone and Marine Area.
- Plans and policies prepared under the SPED shall seek the conservation of all resources especially water in line with the approach taken in the preparation of supplementary planning guidelines related to fireworks factories, fuel stations and cemeteries.

2.7 The SPED is an enabling plan to increase the competitiveness of the Maltese Islands in a manner where socio-economic development assists the achievement of national environmental objectives. The Plan is organised into thematic policies, namely socio-economic development, environment, climate change and travel patterns and policies for the each segment of the spatial structure of the Maltese Islands. These policies are reproduced in the impact analysis section of the Environment report of the SPED.

3. Summary of SEA Process

3.1 The SEA Regulations require that plans and programmes prepared for town and country planning or land use and which are likely to have significant environmental impacts are subject to an SEA procedure.

3.2 The decision by the Cabinet of Ministers in February 2011 to prepare the SPED was coupled by a decision to carry out an SEA on the SPED. The latter decision was published in the Government Gazette of 13th March 2012. The SEA Screening Template for the SPED was prepared to ensure that the administrative provisions were followed. A meeting with the SEA focal point was held at an early stage of the process to discuss the milestones of the procedure.

3.3 An SEA Scoping Report was prepared in March 2012 to identify the main environmental issues requiring assessment, the SEA objectives and indicators. The Scoping Report was submitted to the Designated Authorities and the SEA Focal Point for consultation. The Scoping Report was published for information together with the draft Strategic Plan for Environment and Development in March 2014. The main environmental issues identified in the Scoping Report are provided in Table 1 of the Environment Report of the SPED.

3.4 The Environment Report was issued for public consultation in April 2014. The public consultation lasted eight weeks and ended in June 2014. The Environment Report, in line with

Article 5 of the SEA Directive, includes a description of the reasonable alternatives considered during the drafting of the SPED, a description of the baseline environment relevant to the measures proposed and links with other policies, plans, programmes, environmental objectives, EU Directives, and national legislation. The report also includes existing environmental issues affecting the implementation of the SPED and also the likely significant effect of the measures within the Plan proposed on the environment including issues such as biodiversity, population and human health, climate change, soil and land contamination, water, cultural heritage, transport and infrastructure, air quality, renewable energy sources, resources management, and landscape; and the interrelationship between such factors. A description of possible mitigation measures together with monitoring measures are also described in detail.

4. How environmental considerations and the environmental report were integrated into the plan

4.1 The SEA assessed the SPED against the SEA objectives. The SEA objectives and the respective issues were as follows:

Theme	Issues
Biodiversity	Despite the legal protection biodiversity continues to be threatened by land development, invasive alien species, overexploitation and climate change.
Land	The small size of the Islands and high population density result in competing demands for land. There is a tendency towards inefficient use of land through over provision of development
Soil	Soil quality is affected by contamination, salinisation, soil sealing and erosion arising mainly from increased urbanisation, intensification of agricultural practices and abandonment of agricultural land
Mineral resources	Extraction operations conflict with other economic activities, residential development, human health and the preservation of natural and cultural resources Extraction practices lead to wastage of resource
Water resources including marine waters	Fresh water resources are limited in supply and threatened from over abstraction and pollution from nitrates. Lack of storm water harvesting practices and infrastructure lead to localised flooding incidences Heavy reliance on desalination plants for potable water; Management practices to recover water from treated sewage effluent are not maximised. Management practices to recover water from treated sewage effluent are not maximised. The quality of coastal and marine waters is dependent on land based sources of pollution and development that alters the hydromorphology of these waters.
Built heritage and archaeological remains	Demolition, inappropriate design and use of new and restored buildings which undermines street character as well as pilferage of underwater heritage remain a threat especially if these are not afforded legal protection.
Cultural	Malta's cultural landscape is threatened by the extent of built up area, industrial

landscape	and coastal development, taller buildings on urban fringes that obstruct views of historic centres, modern agricultural practices, increased vehicular access, litter, poor standards of design and work, and lack of maintenance.
Air quality	Malta's significant air pollutants are particulates and nitrogen dioxide mainly arising from traffic, industry and energy generation and ozone mainly from trans-boundary sources.
Noise	Heavy traffic is the main source of ambient noise in the Maltese Islands.
Use of Chemicals	Misuse, poor collection, storage and treatment of chemicals may lead to air, water, and sediment and soil pollution. Pesticides and biocidal products are considered to be particular concern
Solid waste management	Malta's solid waste management practice is heavily dependent on landfills with low levels of material recovery. Construction and demolition waste makes up a significant proportion of total solid waste generated and the associated impacts are land take up, pollution and nuisance related to transport and depletion of mineral resources.
Climate change	The Maltese Islands are vulnerable to the predicted impacts of climate change. A decrease in annual precipitation that may lead to episodes of drought, more intensive storm events leading to flooding and predicted changes in global sea levels are likely to affect ecological processes and consequently the socio-economic activities and infrastructure which depend on them. Energy including transport is the main source of Greenhouse Gas Emissions. Targets for non ETS sector are challenging.

Table 2: SEA Objectives and respective Issues

4.2 The Environment Report and the Strategic Plan for Environment and Development were drawn up concurrently. This iterative process allowed for amendments to the SPED to address specific environmental concerns identified during the process of formulating the Environment Report. The amendments integrated environmental safeguards in the growth promoting policies themselves and also included specific policies.

5. Integration of opinions expressed during Consultation

5.1 The public consultation period of the Environment Report of the SPED ran during the last eight weeks of the public consultation of the SPED (which lasted 12 weeks) received from external stakeholders. Although the SPED and its Environment Report had different email addresses a submissions received on the SPED address also referred to its environment report. 1 submission was received from a designated authority (Ministry for Energy and Health).

All comments and feedback are reproduced in the table below:

Table 1: Stakeholder comments and public consultation feedback

Comments received	Comment	Response
<p>2nd June 2014</p> <p>SEA 001</p> <p>Environmental Health Directorate</p>	<p>4.5.4 Recent data, derived from an EU-funded baseline sampling assessment (re. ERDF 156 project, Deliverable 5), within the context of a broader environmental monitoring initiative, indicate that corresponding national average figures for lead content in soil (derived from 40 sites monitored in 2012) show a figure of 30.5ppm (46.9ppm if one site in Żabbar, displaying a reading of 425ppm, is not taken into account). Should this read, “is taken into account”?</p> <p>4.7.3 While Malta’s air pollution arises from natural sources as well as human activity, key sources of pollution include traffic, industry and energy generation, as well as transboundary sources of pollution (see Table 5). The trend towards reducing natural ventilation in buildings and cars is of concern in this respect. Can you clarify this statement with respect to outdoor air quality? What is the relationship between ventilation and outdoor air quality? Indoor air quality is dependent on outdoor air quality (amongst other things) and ventilation. Health authorities advocate increased ventilation for better indoor air quality, except in cases where the outdoor air quality is poor.</p> <p>4.8.5 The Environmental Noise Directive recognises that certain locations are more sensitive than others (e.g. schools, hospitals and residential areas). It also requires definition of quite quiet areas within the agglomeration (e.g. public open space) and quite quiet areas in the open country where noise levels are to be preserved or reduced.</p>	<p>Agreed and revised accordingly</p> <p>Artificial ventilation systems such as airconditioning systems are increasing demand on energy generation which to date is based mainly on fossil fuels. Consequently this will impinge in increased generation of pollutants associated with the consumption of fossils.</p> <p>Agreed and revised accordingly</p>

	<p>4.8 Noise Legislation regulating noise is comprehensively listed in this environment report but method and level of enforcement, which is perceived by the public to be low, is not assessed. In 2010, noise from neighbours or from the street was reported as being a problem by a total of 28 per cent of households in Malta (National Statistics Office, 2012). Also during the extensive consultation process carried out for the development of the National Environment Policy to identify national environmental issues, noise was listed as a priority issue.</p> <p>4.12 Human health</p> <p>4.12.1. The following sentence <i>“So far research has not directly related environmental change to human health effects in Malta”</i> would be more accurately expressed as <i>“so far little if any research has been carried out to attribute environmental exposures to human health effects in Malta”</i>.</p> <p>5.2 Table 8: Environment objectives and environmental criteria Environment objective: Reduce risks to human health.</p> <p><i>Besides pollution beyond established thresholds for water quality (potable and bathing); air quality; and radiation, the EHD would like to emphasize another possible negative effect i.e. the risk of loss/decrease of areas for recreation and walkable neighbourhoods leading to decrease in access to physical activity which is a significant health concern in Malta.</i></p> <p>7.4 Assessment of SPED policies Thematic Objective 2: <i>To ensure that provision is made for new social and community facilities and to cater for extensions to such existing facilities for</i></p>	<p>It is not the scope of the Environment Report to assess and address administrative measures.</p> <p>The Environment Report has acknowledged noise as an environmental issue which needs to be addressed.</p> <p>Noted. This has been addressed in the final Environment Report.</p> <p>This issue was addressed in the SPED in the policies on the safeguarding, enhancing and designating open space.</p> <p>This aspect is addressed by policy measures advocated by Urban Objective 3.</p>
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	<p><i>education, child care, family care, health, the elderly, the disabled, rehabilitation, places of worship and animal welfare which are accessible for all whilst minimising environmental impacts by: Reduction in noise pollution:</i></p> <p>Reduction in noise may be possible if care is taken to prevent the provision of incompatible facilities close to each other e.g. noisy places of entertainment close to “quiet facilities” such as hospitals, school, places of worship.</p> <p>Thematic Objective 11: <i>To facilitate the provision of an efficient public transport service and other green modes</i></p> <p><i>Reduction of risk to human health: The modal shift is expected to result in improved human health through improved air quality, noise reduction.</i></p> <p>Besides these, another benefit would be increased scope for physical activity.</p> <p>Urban Objective 2: To improve the townscape and environment in historic cores and their setting</p> <p><i>Reduction of risk to human health: Positive impact in view of reduced traffic however not significant.</i></p> <p>The EHD considers any reduction in motorised traffic to have the potential for significant beneficial effect on health. This can be brought about by better traffic regulation leading to decreased emissions (air quality, noise), enhanced road safety and better opportunities for walking, cycling.</p> <p>7.6.26 <i>Impacts on human health are measured from the combined impact on air quality, water quality, radiation and hazardous installations.</i></p> <p>Impacts on human health should also be measured through</p>	<p>This has been integrated in the Environment Report.</p> <p>Agreed</p> <p>Agreed. Text has been amended to reflect impact of noise.</p>
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	<p>1. access to safe green/recreational areas promoting walking, cycling and other physical activity as these have an important impact on human health mentioned in 7.6.30; and</p> <p>2. impact of noise.</p>	
<p>19th June 2015</p> <p>SPED 0027</p> <p>Kummissjoni Interdjocesana Ambjent</p>	<p>The SEA document is too technical (and hence inaccessible) for a large part of the public. Nothing was done to sensitise the public on the issues contained in the document – issues that will have a major impact on their quality of life. The public consultation should have actively prompted public participation. The published SEA Non-technical summary does not even start to address this empower process.</p> <p>Considering the importance of the SEA document in the development of the SPED, the KA is particularly concerned that “no primary data was specifically collated for the purpose of this report “(para 4.2.1). This means that the SEA is another in a series of desktop studies that over these last few years have determined major decisions concerning our well being without bothering to justify and verify the validity of these actions through relevant field data. Whilst succeeding in satisfying the short term goal of reporting obligations, such documents fail to address the real needs and alienate the public from the decision making process. This lack of primary data could have been mitigated to some degree, had it been compensated by an active public consultation process.</p> <p>By definition objectives need to be specific, measurable, realistic and tangible descriptors of what an initiative will deliver in a specific period of time. Properly worded objectives will serve as criteria against which the success of the initiative can be evaluated. The “objectives” (as well as the criteria) listed in SEA’s Table 8:</p>	<p>The scope of the non-technical summary was to provide a guideline to the main report. The Environment report was issued for public consultation for a period of eight weeks.</p> <p>The compilation of the documentation pertaining to the SEA process was dependent on existing sources of information such as monitoring reports, National Environment Policy and other relevant documentation. This satisfies the provisions of LN 497 of 2010.</p> <p>The objectives as well as the criteria were set out in the Scoping Report which was subject to consultation with the designated authorities in line with the requirements of LN 497 of 2010. The objectives and criteria were established</p>

	<p>Environmental Objectives and Environmental Criteria are too vague to be of any value for planning. Consequently the Assessment of Alternatives (Section 7.3), the Assessment of SPED policies (section 7.4), the ensuing analysis, identification and prioritisation of the major environmental issues emerging from the SPED policies (Section 7.6) as well as the Monitoring (Section 8) are flawed.</p> <p>Related to Health, the KA notes a serious omission in the SEA. In Section 4.9 dealing with Chemicals, there is absolutely no mention of marked impact of fireworks highlighted in local research.</p>	<p>in line with Schedule 1 (f) of the same legal notice.</p> <p>Noted. This has been addressed in the final Environment Report.</p>
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6. Reasons for choosing the plan

6.1 In the formulation of the plan a number of strategic options were considered prior to the selection of the strategy for the SPED. The Status Quo (or Zero Option) was discarded a priori since the impacts on the environment necessitated a different approach to current developmental behaviour.

Strategic Options

6.2 Government guidance for the preparation of the SPED included both economic oriented and environmental protection priorities. Three alternatives were generated to enable an informed analysis on different modes of reaching the Government guidance. These are

Option 1:

- Dispersal of urban development within the Urban Area.
- A wider range of acceptable uses in the Rural Area.
- All Uses can be accommodated along all the coast and marine area.

6.3 This Option entails a weak locational strategy. Urban development can be located within all parts of the Urban Area. The degree of diversification of agricultural uses is wide including urban development and could replace individual agricultural holdings as long as it supports farming as an activity. Any type of development can be located throughout the coastal and marine areas.

Option 2:

- Most new jobs directed to existing and new economic development hubs and the bulk of residential development within the Urban Area's conurbation.

- Facilitating a range of acceptable uses (to support rural diversification) in the Rural Area.
- Only legitimate coastal uses accommodated on the Coastal Zone and Marine Area within sub zones.

6.4 This Option directs most urban development towards the urban conurbation and concentrates economic development within existing hubs whilst allowing the creation of new hubs to accommodate additional economic growth and/or develop specialised businesses. The range of uses for farm diversification which support agricultural activities is wide but excludes urban development and cannot replace an individual agricultural holding. Only development which requires a coastal and marine location can be accommodated in specific designated areas and sub-areas in the Coastal Zone and Marine Area.

Option 3:

- Most new jobs within consolidated existing economic development hubs and the bulk of residential development within designated residential areas in the Urban Area.
- Limited range of acceptable uses (for informal recreation and agriculture) in the Rural Area.
- Legitimate coastal uses can only be accommodated on committed space on the Coastal Zone and the Marine Area.

6.5 This Option directs new economic development and additional growth to existing economic development hubs without the creation of new ones, whilst residential development can only take place in specifically designated area for such uses. The range of uses for farm diversification which support agricultural activities is limited, excludes urban development and cannot replace an individual agricultural holding. Development which requires a coastal and marine location can only be accommodated on previously developed land for landward development and sea space which already accommodates development in the Coastal Zone and the Marine Area.

6.6 The following assumption was applicable to the three options: The development strategy should be implemented whilst protecting and managing natural and cultural resources; safeguarding the rural distinctiveness; and maintaining and enhancing environmental quality.

6.7 Following the analysis of the impact assessment, Option 2 was deemed to be the option that best addresses this guidance whilst seeking to avoid significant environmental concerns.

7. Monitoring measures adopted during implementation of the SPED

7.1 In order to monitor the significant environmental effects of the implementation of the SPED, the Environment Report recommended a proposed list of monitoring indicators, selected to keep track of progress towards achieving the strategic environmental objectives. The full list of proposed indicators is provided in table 3 below.

Ref No.	Environmental Objective	Indicators	Data source
1	Protect, and where necessary restore wild species and habitats	Integrity of protected species or site is threatened by proposal An unprotected species or habitat is likely to become threatened on a national scale	MEPA data base: 1) Natura 2000 data cards 2) MEPA ecology data 3) Areas of protected habitats 4) List of protected species and distribution 5) List of endangered and threatened species
2	Protect and use soils in a sustainable way	Deterioration of soil status	1) State of the Environment Reports
3	Prevent further deterioration, protect and enhance the status of water resources (surface, ground, coastal)	Possible deterioration of a water body	1) Water Catchment Management Plan and associated monitoring reports
4	Reduce waste	Increase in biodegradable waste going to landfill Reduction in the recovery of domestic waste Reduction in the recovery of C&D waste	1) Waste Management Plan 2012 and associated monitoring reports 2) Wasteserv data
5	Reduce air pollution from mobile and non mobile sources	Exceedance of the limit values beyond Annex XI of Directive 2008/50/EC and critical levels beyond Annex XIII	1) MEPA Air Quality monitoring data and reports
6	Reduce noise pollution	Exceedance from road traffic of 65db during the day and 55db during the night; and for quiet areas [such as in open country, near schools, hospitals] 55 dB by day 45 dB by night]	1) MEPA Noise Monitoring data and reports associated with Noise Action Plan
7	Reduce greenhouse gas emissions	Increase in GHG emissions Decrease in energy	1) National Inventory Reports 2) State of Environment Reports

		efficiency from transport, household and industry Uptake of renewable energy	3) National Renewable Energy Plan and associated monitoring reports
8	Protect, enhance and restore cultural heritage	Integrity of protected and sensitive cultural heritage elements	MEPA data base: 1) UCA Character Appraisals 2) Street characterisation 3) Scheduled property
9	Reduce risks to human health	Proposal will introduce pollution beyond established thresholds for water quality (potable and bathing); air quality; radiation. Proposal is likely to be subjected to IPPC or SEVESO regulatory process	1) National Environmental Health Action Plan and associated monitoring reports. 2) MEPA Air Quality monitoring data and reports 3)MEPA Noise Monitoring data and reports associated with Noise Action Plan 4)Water Catchment Management Plan and associated monitoring reports
10	Protect and use material assets in a sustainable way	Proposal is likely to lead to: - possible deterioration of ground water and coastal waters in RO protection zones; or -land take up of rural area for urban development that can be accommodated in urban areas; or - loss of significant volumes of mineral resources or - significant drop in commercial fish stocks	1)Water Catchment Management Plan and associated monitoring reports 2) Marine Strategy Framework Directive associated monitoring reports

Table 3: Monitoring Indicators identified in the Environment Report of the SPED