



## **Comments on the revised Environmental Planning Statement concerning the redevelopment of a hotel at Delimara 12<sup>th</sup> July 2017**

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As a reaction on the new public consultation for development PA02767/16 “Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities” in Ta’ Kalanka, Delimara, BirdLife Malta notes the responses made by the EIA consultants to our previous two rounds of comments (Comments on EPS dated February 2017; Comments on PDS dated June 2016).

We would however still like to highlight the following concerns, also further to the revisions made to the Certified Environmental Statement/EPS as follows.

1. The proposed hotel development is located within ODZ and exceeds the footprint of the existing building on site which is being redeveloped. This is in breach of ODZ policies. We understand that the EPS has considered the impacts of the proposed footprint, however this does not change the fact that the proposed development goes against set policies. ERA and PA have the responsibility to consider such in their decision making process.
2. In our original submission, we have highlighted that the development is in breach of SPED and Policy MD01 which designates the area as the Delimara National Park. The answers provided in this regard, do not justify the fact that these policies will be breached. Furthermore we do not agree with the consultants’ conclusions that disturbance and damage to habitats and wildlife are evaluated as “minor” under the condition of good construction practices and monitoring of works. Even if such was the situation, this again does not justify these policies being breached.

We consider the mitigation measures proposed in this regard as insufficient due to (1) imprecise description of measures and how these will be enforced, and (2) due to the fact that habitat impacts will continue during the operational phase of the development due to increased human interaction from hotel guests and beach facility users.

3. The impacts on the ecological value of the area are described as potentially causing a significant impact, (termed as likely and major for habitats of conservation significance) during both the construction and operational phase of the development. We do not agree that should the mitigation measures proposed be enacted, the residual impact can be concluded as being minor. The mitigation measures proposed rely solely on good practice (for which similar developments demonstrate this is not achievable), and in reality there is little that can be mitigated from the impacts related to increased visitors to the areas as a result of the development.
4. We have also highlighted in a previous version the likely impacts associated from dust emissions. These are not addressed adequately in the revised version of the EPS, and the

consultant should at the very least suggest how to minimise such an impact. In the absence of such recommendations, the impact from this activity will be a reality affecting both the ecological value of the site and other receptors. The mitigations measures are insufficient and too general.

5. Regarding the possible noise impact, if it cannot be guaranteed that any mitigation measures can address such a concern, we advise that this impact is termed as being a significant one and is included as a predicted impact in the summary of impacts in the EPS. This should be a criterion which should not be dismissed in the decision making process, and should be included in the summary of residual impacts.
6. Regarding traffic impact, the fact that the development may generate less than 1,000 vehicles does not merit the competent authorities to dismiss this as a possible impact. The hotel is a development that will generate traffic during its construction and operational phases, and might possibly result in furthermore traffic due to the fact that the services the hotel provides will attract non-residents to the area. The Simplified Traffic Statement is not included in the EPS, and there is no indication whether ERA and PA have actually reviewed this in details. Such an analysis should be made public to comment upon accordingly. Whether an extra 131 vehicles will cause significant additional air pollution to the area, is just one of many impacts associated with increased traffic to the area.
7. In the original PDS, it is pointed out that a number of small structures that appear to be used by hunters are located within the area. The EPS does not properly address these hunting activities. To guarantee efforts of conservation and protection and improvement of the natural heritage in the region, existing hunting structures would have to be demolished, particularly if the structures are illegal.
8. Another raised point that has not been tackled in the EPS is that the proposed development site is bordering agricultural land in the north. A comprehensive study to analyse the present agroecosystem, including conditions of soil nutrient and soil biota, has not been carried out nor has the section on ambitions to protect and safeguard good quality agricultural land from development under the SPED as well as avoiding change in traditional lifestyle.