



## Comments on Paceville Malta's Prime coastal location Development Framework December 2016

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Reference is being made to the “Paceville Malta’s Prime coastal location Development Framework” (hereafter referred to as Paceville Masterplan) drafted on the request of the Planning Authority and currently open for public consultation.

BirdLife Malta has reviewed the Paceville Masterplan. As a result, we want to highlight several sections of the document that we consider as being of major concern, most particularly the proposed development by land reclamation at Porto Maso “Site 6”.

### **BirdLife Malta strongly opposes the potential land reclamation in Porto Maso due to its irreversible environmental impact and its contradiction to the set agenda of the SPED**

Land reclamations have a major negative impact on the marine environment and coastal marine habitats because such developments particularly cause irreversible destruction. When land is reclaimed from the sea, marine habitats are permanently lost which can cause changes in coastal currents, increased noise and reduced water quality especially during the construction phase. The suspension of sediments on the seabed causes increased turbidity which then has an impact on levels of light transmitting. This negatively affects the functioning of light-dependent organisms such as phytoplankton, and is of detriment to sea grass meadows and the ecological systems they support

The proposed land reclamation, located at Porto Maso, overlaps with the Natura 2000 site Il-Bahar fil-Grigal ta' Malta, an important marine Natura 2000 site hosting a large variety of Posidonia meadows sub-types and Sandbanks. In certain parts of Il-Bahar fil-Grigal ta' Malta, the Posidonia meadows are already degraded and showing signs of regression resulting from anthropogenic activities which is highly alarming and measurements have to be put in place, so that the marine Natura 2000 site will not be exposed to further destruction. Seagrass is important because of its ecological value for instance as a carbon sinks and habitats for marine species and is a priority habitat under the Habitats' Directive

As pointed out in the Paceville Masterplan “This area [Porto Maso] is adjacent to a Marine Special Area of Conservation to the west of the site, and, therefore, a sensitive development approach would be required for this site”. This approach is inappropriate for the damage being caused, a “sensitive development approach” is by far not enough when it comes land reclamation. The development of Porto Maso Site 6 requires a full Environmental Impact Assessment – an Environmental Impact Statement (EIS) –for the land reclamation by law (EIA Regulations, 2007, 4.1.1.1. Reclamation of land from the sea and fastening installations to the bed of the sea of raising the level of the bed of the sea and having an area of 1 ha or more). It also requires an Appropriate Assessment since the development falls within and shall impact a marine SAC.



It is furthermore highly questionable why land reclamation plans are being proposed for commercial reasons. Regarding the Paceville Masterplan, the land reclaimed will be used for “high quality luxury hotel accommodation with ancillary retail uses”. In the EU, land reclamation projects are usually carried out for harbour expansions, associated industrial developments and agricultural purposes, not least because of their tremendous environmental intervention.<sup>1</sup>

From the perspective of an environmental NGO with the objective to act on behalf of the general public bests’ interest, we oppose the proposed land reclamation and want to raise the question to the Planning Authority why this has been considered in the first place under the given fact that these plans are made for private investors to build hotels on.

A major reason for this is the lack of an adequate property management system of the marine and coastal areas in the Maltese islands. Under these circumstances which have been highlighted by the SPED already in 2015, protection is not guaranteed and it has been identified that user conflicts within coastal areas become even more significant. Land reclamation in Porto Maso goes against the SPED, not least because of Coastal Objective one which “aims towards prioritizing uses that minimize user conflicts, does not accelerate coastal erosion, protect biodiversity and provide visual and public access” (SPED, 2015). Such conflicts are reflected by the public outcry after presenting the Paceville Masterplan and should be appropriately addressed by the responsible authorities.

In terms of land reclamation, BirdLife Malta seriously questions the policy being adopted by the Planning Authority for the future of the Maltese Islands, whereby it appears that rather than considering a cap to unsustainable development, the authority is ready to allow the reclamation of the marine environment in order to allow further development within densely built-up areas. Whereas a sound policy that allows for high-rise buildings, might mitigate the demand for the uptake of green areas, the planning authority should not be in a position to advocate for the use of the marine environment, in order to accommodate the need for further development.

In addition, the Paceville Masterplan has not taken into account its possible effects on the locally protected sensitive environmental sites which include (1) the Harq Hammiem Valley and Underground Cave, and (2) the Freshwater Wetland at il-Qaliet. It also proposes the development of at least 3 high-rise towers on coastal land forming part of the public domain, as well as the destruction of the coastal perimeter and protected seabed for the proposed land reclamation. No master plan should be published until a critical study on its environmental impact is drawn up and mitigation measures have been included to form part of the plan.

**BirdLife Malta furthermore wants to highlight the applicable regulations to build in Urban Areas under the SPED, which is not aligned with the developments in the Paceville Masterplan**

The main objective for Urban Areas is that these “shall be clean, pollution free, safe, green, and energy efficient [...]”. It is unjustifiable that the prioritized strategy of the Paceville Masterplan to reorganize

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<sup>1</sup> OSPAR Commission, 2008, Assessment of the environmental impact of land reclamation. [www.ospar.org/documents?d=7123](http://www.ospar.org/documents?d=7123) [accessed on 24 November 2016]



transport in Paceville is “Option 3 - Balanced Transport Strategy” which is not the most sustainable option although it already has been identified that “Increasing densities have had a number of negative effects manifested to different degrees in certain localities with the impact of the quality of streetscape and public open spaces, social and community facilities, increased traffic flows and on residential amenity and the general upkeep of the environment” (SPED, 2015).

Regarding the amount of high-rise buildings planned under the Paceville Masterplan, we would like to highlight our concerns since this is also against the SPED, which states “their [tall buildings] impact on the Maltese landscape is becoming a matter of concern. Between 2002 and 2007 12 tall/medium rise buildings all located within densely build up areas such as Tigne/St. Juliens/Sliema were approved (SPED, 2015). The current state of Urban Areas in Malta reflects that access to green spaces and other recreational facilities are not sufficient to support a healthy lifestyle for residents in cities. This should be a major focus for Masterplans.

The population is set to increase from just under 2,000 people to almost 10,000 residents. Such critical changes cannot be proposed in isolation and must be assessed in relation to the island’s carrying capacity. The proposed increased density will have an irreversible impact on the neighbouring areas, especially in relation to transport, air and noise pollution, and infrastructure. Given this, we propose that the master plan be revised and resubmitted to include the encompassing areas of Swieqi, Pembroke and all of the St Julian’s area to ensure the creation of a truly long-term strategic framework.

The proposed allocation of €585,000,000 for infrastructural development in an area of less than 1 km<sup>2</sup> is completely out of proportion with investment being proposed in other regions of the island presently in dire need of regeneration.

**BirdLife Malta furthermore wants to comment on the overall public consultation procedures of the Paceville Masterplan:**

According to Maltese law, all stakeholders need to be consulted at the very early stages of environmental policy development. In this case, the residents and property owners active in the area were only consulted at a late stage. This is not the way a masterplan should be drawn up and has resulted in a fundamentally flawed proposal. The Paceville Masterplan has not been based on any social impact assessments - no master plan should be put forward to public consultation until a critical study of its effects on social groups has been drawn up and mitigation measures have been included in the plan. It will set a dangerous precedent by proposing the expropriation of private people’s homes to make way for open spaces and roads for the benefit of certain developments.

The proposed masterplan must form part of a holistic vision for the island as a whole, proposing an equal balance between social, environment and economic development, thereby setting the foundations for a truly long-term vision of sustainable growth and progress. This masterplan must go back to the drawing board and the process restarted with the three pillars of sustainability - the social, the environmental, and the economic - given their due weight from the very beginning.