



BirdLife Malta's comments to a draft Environmental Impact Statement concerning a proposed beach replenishment project for Xemxija Bay

Application No: TKR145703 [EA00001/12]

December 2016

1. Introduction

BirdLife Malta is hereby submitting its position paper on the above proposed development, following a consultation period launched by ERA (Environment and Resources Authority) on the 14th November 2016. While as stated in the draft EIS, the organisation had been consulted by ADI Associates regarding the EIS being prepared for the area, the organization has to date never formally submitted its position or comments with respect to the proposed beach replenishment project.

BirdLife Malta has reviewed all documents made available, namely, the draft EIS, the technical appendices to it, and the Appropriate Assessment, however it reserves its right to comment further on this development, in due course, should the development be considered further. It is to be noted that the plans made available in the EIS documentation do not carry much detail, and therefore we invite the developer and the environmental consultant to make available all detailed plans, fully illustrated, so as to allow for a better understanding of the proposed development.

Our comments revolve around two main sensitive areas which in our opinion may be affected by the proposed development, as well as the proposed increased use of the replenished beach throughout the operational stage of the development, which is the ultimate aim of this project. These sensitive sites includes the Simar Nature Reserve, sited as part of is-Simar Natura 2000 site as well as Selmunett Islands, which have been recently identified by BirdLife Malta and BirdLife International as an Important Bird Area, following the rediscovery of a Yelkouan Shearwater colony nesting on these islands. The area has been proposed to ERA as a candidate site for the designation of a Special Protection Area (SPA) as part of Malta's Natura 2000 network (BirdLife Malta, 2016b).

2. A beach replenishment project with an unknown socio-economic and traffic impact

It is understood that the main driver behind the proposed development is to reinstate Xemxija as a swimming destination, further to a progressive loss of the sandy beach, indirectly caused by insensitive development and urbanization of the Xemxija/St Paul's area shoreline. While the concept of reinstating a lost beach is a commendable one, the main driver behind this project is that of providing an added attraction to the North part of the islands, with the aim of relieving pressure from other beaches which are often well crowded in the summer months. This objective makes sense, however we doubt its realization given the current tourism growth scenario which is seeing more and more tourists holidaying on the island, with no sign of a carrying capacity being considered for the island by government authorities.

Without a proper socio-economic analysis investigating the need and the resulting scenario from this development, we seriously express our doubts whether a replenished xemxija beach will relieve the pressure from other beaches, or simply result in an added tourism flocking spot, in an otherwise already populated area. The xemxija beach and the road that runs along the promenade are the only main thoroughfare that connects the northern part of the island through the Ten-T road network. An increased amenity use of the xemxija beach area will undoubtedly increase traffic along this road, with all its associated impacts of noise, light and air pollution. The EIS does not delve into these possible serious impacts, however simply refers to a 'social baseline study' which is practically an analysis of people's perception. This study does not do any justice to the possible socio-economic impact a development of this kind may generate on various fronts.

Although quoted within the EIS documentation, a traffic impact statement (TIS) prepared by Lewis (2015) is not available for consultation. Such a TIS is crucial in order to determine the ultimate impact this development may generate, and should also take into consideration any other major developments which have been approved in the area (such as the Mistra development) which will continue increasing traffic pressure along the Xemxija area. The cumulative effect of all these developments, including the proposed one should be analysed carefully in order to deduce the viability of the proposed development. In the scenario that the infrastructure present, shall not cater for the increased use of the area, the development application should be re-considered.

It is hereby being recommended that ERA requests the developer to undertake a socio-economic impact assessment of the proposed development, as well as requests the developer or consultant to make available for public consultation a TIS for the development, which impact assessment should be included as part and parcel of the coordinated assessment presented for public consultation.

3. General comments and concerns regarding the development

The appropriate assessment carried out for this development highlights the main impacts expected from this development with respect to the Simar Nature Reserve as well as suggests suitable mitigation measures. However, further to an analysis of the scheme of the development and the proposed mitigation measures, the following are being highlighted:

3.1 Concerns over the construction of a culvert system to collect and channel surface water run-off

From the plans made available in the EIS, the concept of how such a culvert system may function is not properly understood, other than the fact that rather than emptying surface water run-off from the middle of the beach, the culvert shall deviate these to the sides of the beach so as to not allow for run-off to carry away any replenished sand. **It is hereby being requested that the developer submits more detailed plans and sections, including elevations of how the culvert system will be sited and how it will function.**

The Simar nature reserve is by its very nature a coastal wetland which is connected to the beach via a duct which serves to empty excess water from within the reserve to the beach. Accordingly, this duct, which serves as a drainage for the reserve, also carries the important function of keeping the coastal lagoon system of the Simar Reserve in contact with the sea such that during heavy periods of rainfall there is some continuity between the reserve lagoons and the beach. As is the case with Ghadira Nature reserve this continuity is crucial for allowing the migration of species in between the lagoon and the reserve such as the grey mullet and eels, both of which are vitally important as prey species for various birds that inhabit or winter within the reserve, and are part of the ecology of the area.

It is therefore being recommended that whatever system is placed in between the nature reserve and the beach, this maintains this vital link of water continuity. This does not need to be a permanent connection but rather one that can be created whenever there is a heavy flow of surface water run-off, or even when there are storm surges which would naturally cause such a phenomenon.

BirdLife Malta expresses doubts however whether the above may be allowed for with the proposed culvert system emptying to the sides of the beach, or even having a culvert which appears to be quite elevated from sea level.

Alternative layouts should be considered, including the maintenance and upgrading of the current culvert/duct which empties directly on the side of the bay.

3.2 Concerns over the construction of new buildings comprising toilets, clinic, store, lifeguard towers, etc

The proposed structures will be new structures in an area along the beach which has no buildings whatsoever. The photomontages provided do not include the perspective from Simar Nature Reserve and therefore the impact that may be caused, even visually, from these structures cannot be ascertained.

It is not clear whether these structures shall also have lights during the night, which might have an impact on the nature reserve, as well as in general contribute to light pollution incoming from the area which undoubtedly may effect sensitive species such as Yelkouan Shearwaters on Selmunett Islands.

It is therefore being recommended that the visual and landscape impact is also considered for is-Simar Natura 2000 site, and such an impact should also consider the nightscape of the area, in order to fully determine the impact of the proposed development.

3.3 Concerns over the provision of parking spaces

The replenishment of the beach with an added amenity use of the area will undoubtedly create a demand for parking spaces. Without consulting with a traffic impact statement prepared for this development, it is currently not possible to ascertain whether the parking spaces included in the plans shall suffice the demand. In the likelihood this does not cater for the demand, the increased use of the area by the general public, shall undoubtedly create a need for parking spaces, which shall spill over to the adjacent streets and areas, causing an inconvenience to residents, possibly slow down traffic flow, as well as expose agricultural land in the vicinity of the beach to be used up as makeshift parking areas (as often is the case in other beaches).

Whereas the non-provision of parking spaces may be an incentive for the general public to utilize public transport and other 'greener' means of travelling, suitable mitigation measures need to be put in place by the developer to ascertain this occurs. These may include measures such as the establishment of timed parking zones, and upgrading of street/road boundaries especially along Triq il-Pwales to prevent off-road parking which would be detrimental to the Natura 2000 site, and its integrity.

With respect to the parking spaces included in the scheme, it is not clear whether the new parking bays in Section C of Figure 3.8 of the EIS, shall impinge on the olive grove that borders the Simar Nature Reserve or whether the same footprint of the existing road shall be maintained. This should be clarified by the developer/consultant.

3.4 Concerns over the privatization of the beach

The draft EIS document declares that *'It is intended that the majority of the beach will be wholly 'public'; areas at the northern and southern end of the beach, however, may be under private management through a concession agreement; the concessionaires will have the responsibility of managing and providing for the cleaning and general upkeep of the entire beach.'*

It has to be reminded that the foreshore area should be of public domain, and accordingly it is not acceptable for public land to be provided to concessionaries for economic benefit. This may in the long term generate a further demand for development of commercial outlets in the area. The developer's intention to this respect should be made clear, and included in any permit conditions, should the development be considered further.

3.5 Proposed mitigation measures

The AA and draft EIS propose a number of mitigation measures such as the reduction of light pollution from the Xemxija area. This is commended owing to the proximity of the Simar Nature Reserve as well as the seabird colony of Selmunett Island.

The North West Local Plan provides for the opportunity for further mitigation measures to be considered, as these would be favoured by such policies.

In particular North West Local Plan policy NWCO 8 on Bird Sanctuaries favours an expansion of the Simar Nature Reserve. This possibility should be looked into as a mitigation measure, especially if the new layout will impact on pristine land or generate pressure on the adjacent Natura 2000 site.

Other mitigation measures that can be considered include an adequate revision of building height policies in proximity to the Simar Nature Reserve. Should the development go ahead, and accordingly result in a more intense activity at the foreshore of the nature reserve, the integrity of the reserve could be preserved by not allowing further development in close proximity of the nature reserve. BirdLife Malta has highlighted its preoccupation with building heights next to Simar Nature reserve in a press release issued in November 2016 (BirdLife Malta, 2016a).

4. Conclusion

While it reserves its right to comment further on this development and the EIA/AA process, BirdLife Malta would like to express its concerns on the following with respect to the Xemxija beach replenishment project:

- The objectives of the project in replenishing a lost beach are commendable, however the resulting effects of the project are difficult to ascertain in the absence of a socio-economic impact of the proposed development. We request that ERA looks into this matter in order to see the eligibility and justification of this project.
- The EIS does not refer to, or published the Traffic Impact Statement for the proposed development. This is crucial for a development of this kind which is on a primary thoroughfare, which might result in a further increase in traffic in the area. A Traffic Impact Statement should be published and referred to in the environment impact assessment.
- The EIS should include more detailed plans of the proposed development in order to help ascertain better the impacts it may have on the Simar Nature Reserve. Concerns include the height of the development and its ancillary facilities, the proposed culvert/duct linkage between the reserve and the beach, and the provision of parking spaces in the area which may or may not be sufficient, subject to the outcome of the TIS.

We invite the developer and consultant to clarify all above matters, and address these in the next version of the EIS.

ENDS

References

- BirdLife Malta, 2016. BirdLife Malta concerned about future of Simar Nature Reserve. Press Release of the 10th November 2016 – available online - <http://birdlifemalta.org/2016/11/birdlife-malta-concerned-future-simar-nature-reserve/>
- BirdLife Malta, 2016. SPA proposals and updates resulting from the LIFE+ Malta Seabird Project. Document presented to MSDEC and ERA as part of the LIFE+ Malta Seabird Project (LIFE10 NAT/MT/090)
- Lewis, W., 2015. Proposed Beach Replenishment Project, Xemxija Bay, Malta. Traffic Impact Statement. May 2015; 142 pp.