



Comments on Project Development Statement TRK155949 24th June 2016

As a reaction on the proposed development TRK 155949 “Construction on an elderly residence in Ħal-Luqa”, BirdLife Malta would like to comment as follows:

BirdLife Malta does not support the proposed development due to the following arguments:

- Rural Policy and Design Guidelines, 2014, determines developments that can be undertaken in Outside Development Zones (ODZ). This plan was not considered for the PDS.
The development does not qualify for a development in ODZ land as per Rural Policy and Design Guidelines, 2014.
- Several policy obligations under the SPED which are pointed out in the PDS speak against the development of the proposed site (e.g. Thematic Objective 1 of the NSF/SPED “Reducing development densities of urban settlements” and “Increasing green open space”, p. 17 PDS). As identified in the SMLP, the pressure to develop in ODZ between 1994 and 2000 has been massive in the southern region of Malta. New dwellings accounted for 43% of approved applications which led to the creation of 82 new dwelling units. This number shows that although located in ODZ, it has become a general circumstance to approve developments in ODZ although this is strictly against national law.
All applying national policy and legal frameworks to develop this site have to be considered when final decisions of this development proposal will be taken by ERA.

Having consulted the above policy documents, BirdLife Malta sees no justification for the development to be undertaken in ODZ land.

The proposed development qualifies for an EIS as per Environmental Impact Assessment Regulations, 2007, Section 3.9.1.1. Therefore, BLM recommends that the EIS has to consider the following issues:

- There is no justification to choose the proposed site for developing an elderly residents in Ħal-Luqa in ODZ land - alternative sites were not considered sufficiently. As indicated in the South Malta Local Plan (SMLP), there is a potential site recommended for the development of an elderly residence in very close distance to the current proposed site – the Schreiber football ground in Paola which is currently in a state of disuse. As per policy SMGH 01 14.4.1. (SMLP), the site is just behind the parish office and the provision of related social and community facilities e.g. the provision of an elderly day care centre on this site would be considered favourable.
The EIS should consider the above-mentioned site as an alternative location for the elderly residence in Ħal-Luqa as advised by the South Malta Local Plan.

- The proposed development site is also located on the Main Mean Sea Level Aquifer. The area is a drinking water protected area and a drinking water safeguard zone (Ground Water Protection Zone). Furthermore it has been identified that the wider area supports two large reservoirs - one along Triq Giuseppe Garibaldi and the other located beneath the school. Ecological and hydrological surveys conducted to determine sustainable planning - in the region of the South Malta Local Plan in which the proposed development is located – identifies the importance of catchment and valley systems in this area as a source of freshwater for Malta. This is particularly important since the proposed development will involve substantial excavation of rock of approximately 31,000 m³ which can cause severe erosion.

Developments in this area contradict with the necessity of special protection with regard to water resources management and contamination of water catchments (as per SMLP, SPED). The EIS has to delve into the hydrological impacts caused during constructional and operational phase with regards to erosion and important water catchments in the region.

- The surrounding area includes a number of natural heritage designations, such as the Iċ-Ċimiterju tal-Addolorata Tree Protection Area, and Bird Sanctuary in the area.

Any impacts on these areas of ecological importance have to be adequately identified in the EIS.