



Comments on Project Development Statement:

Cultural Village (TRK163401, TRK163969)

6th June 2016

BirdLife Malta has reviewed the Project Description Statement (PDS) for the proposed development.

The development of a “Cultural Village”, located in Marsa, qualifies for a full Environmental Impact Assessment (EIA) as per section 3.4.2.1 Theme parks with a site area of more than 5,000m², of the Development Planning Act (CAP. 356) and the Environmental Protection Act (CAP. 435), and therefore requires an Environmental Planning Statement (EPS), under national law. The following highlighted points have to be included in the EPS, providing detailed information which are missing in the PDS:

- Given the lack of natural heritage located in this area, it has to be ensured that future developments will not contribute to further environmental destruction. This includes a potential removal of *Ficus microcarpa* and *Eucalyptus gomphocephala* located in the area as well as the dense vegetation along the artificial watercourses next to the Marsa Sports Complex. As pointed out in the PDS, the trees have been planted to attract migratory birds and to enhance the biodiversity within the area. The PDS is not clear whether these trees will be removed or whether they would be replaced with other tree species. Given the highly industrialised ambient, the trees must remain in their location to maintain the already sparse biodiversity in this area.
- Furthermore, the PDS does not delve into the impact on traffic such a development may cause, and lacks to mention the need of a Traffic Impact Statement (TIS). For the location of Marsa, the Grand Harbor Local Plan (GHLP) identifies as one of its four main strategic goals the achievement of “[...] a general improvement in the environment”. Developments in this area should aim to address issues of traffic and public transport, whilst strongly considering the basic theme of environmental improvement as a main approach in order to reduce environmental impact and guarantee general safety. Local residents and the general public are already exposed to heavy traffic volume. The development of a cultural hub as described in the PDS will increase traffic in and around the location (Albert Town Industrial Zone) due to rising visitor numbers at the location (including car parking particularly during carnival and festive season) tremendously. The close by Triq Aldo Moro is the main route to connect the North and the South of the island and it is also an important connection to the airport. The street will be impacted by increased traffic and parking during events, causing heavy air pollution and noise impact.

BirdLife Malta urges for an EPS and a full TIS for this development. Furthermore, a profound and more detailed justification of alternative site development should be provided in consistent with the GHLP (or any other applying Local Plan).