



## Comments on Project Development Statement TRK163702 15th June 2016

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As a reaction on the proposed development TRK 163702 “Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities” in Ta’ Kalanka, Delimara, BirdLife Malta would like to submit the following comments:

- The proposed development qualifies for an Environmental Planning Statement (EPS) as per Schedule IA, Category 3.3.2.2(ii) of the EIA Regulations, 2007 (S.L. 504.79), hence ***a full EIS should be prepared and be available for public consultation***
- The development site covers an area of approximately 3,646sqm including landscaped areas, however, the current buildings’ footprint covers an area of approximately 343sqm. The replacement buildings should not exceed the total floor area of the previous buildings as per the Rural Policy and Design Guidance, 2014, part 6. It is stated in the PDS, that the building area will be increased from 343sqm to 561sqm.  
***This is against the national policy frameworks and should disqualify the planning application. It appears that the conditions that would allow this development to be allowed in an ODZ area are not met, and accordingly these development plans do not qualify for the granting of a permit.***
- As stated correctly in the PDS, Policy MD01 of the SPED designates Delimara Peninsula as the Delimara National Park. Hence, in accordance with Structure Plan Policy RCO14, the greater part of the Delimara Peninsula, as defined on the Policy Map, will be designated as a national park where priority will be given to conservation, protection and improvement of the natural heritage. In this location, positive provision will also be made for recreational uses consistent with this objective. Limited commercial development related to the needs of park users will be considered. Other uses likely to have a harmful or conflicting impact will be refused.  
***The development of “13 luxury suites, 3 superior deluxe suites and 1 presidential suite, a lounge, bar and restaurant, gym, spa and outdoor pool as well as the development of beach facilities (for public use) at Kalanka Bay including public toilets and showers, a first aid room, storage room and waste separation facilities” does not contribute to conserve, protect or improve the natural heritage of the area. It is furthermore not clear in what sense these developments reflect the implementation of “environmentally friendly measures” as stated in the PDS title***
- In the PDS, it is pointed out that in the area, there are a number of small structures that appear to be used by hunters.  
***The hunting activities have to be properly addressed and existing structures have to be demolished to guarantee the conservation, protection and improvement of the natural heritage in the region, particularly if the structures are illegal.***
- The proposed development site is bordering agricultural land in the north.  
***A comprehensive study to analyze the present agroecosystem, including conditions of soil nutrient and soil biota, is essential to determine potential environmental impacts and***

**risks. It should be identified whether the development would impact land of agricultural value.**

- The proposed development lies within two Areas of Ecological Importance (AEI), one Site of Scientific Importance (SSI), and an Area of High Landscape Value (AHLV). AEI's, SSI's and AHLV's require protection from developments because of their considerable ecological and scientific values.

**ERA is obliged to safeguard and protect these areas/sites and therefore has to ensure that the proposed development meets the relevant environmental assessment criteria prior to take decisions on the realization of the project.**

- Negative environmental impacts will arise during constructional and operational phase of the project, including noise, vibration, dust, and surface water runoff. The impact of such activities can be transported via sea affecting a larger area of the marine environment.

**These impacts have to be identified in the EIS and addressed adequately.**

- The development may introduce excessive lighting during the constructions and operational phase, bringing light to an area which is otherwise not provided with any street lighting. The impact of the development in relation to contributing to sky glow in relation or addition to other major developments in the area needs to be carefully assessed, especially with regards to the impact of certain wildlife such as seabirds which are sensitive to coastal light pollution.
- Traffic will increase both, during construction and operation of the project, including heavy-vehicle traffic and traffic due to visitors to the area. This will cause negative impacts on air quality and will limit the availability of public space. Additional parking demand may be caused by the development, resulting in an impact on surrounding land.

**These impacts have to be identified in the EIS and addressed adequately. It has to be looked into whether this is in line with the obligations of relevant policy plans, such as the SPED.**

- The development envisages the excavation of a car park and also a tunnel. This may cause an impact on the surrounding geology and Kalanka beach caused via vibrations caused by the excavation. **These impacts have to be identified in the EIS and addressed adequately.**
- The national power plant facility is in the immediate surrounding of the proposed development. Emissions and noise resulting from the power plant might have an impact on hotel users which needs to be considered.

**The EIS should point out respective measurements to ensure that no negative effects on human health and the environment arise.**