



## Comments on PA 03807/17 “Proposed City Centre multi-use development, including 5 Star Hotel (464 rooms) Class 3B, 158 residences, commercial office space (Class 4A), shopping mall (Class 4B) & restaurants (Class 4C and 4D) and basement car park”

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BirdLife Malta has reviewed the EIA Report of PA 03807/17 “Proposed City Centre multi-use development, including 5 Star Hotel (464 rooms) Class 3B, 158 residences, commercial office space (Class 4A), shopping mall (Class 4B) & restaurants (Class 4C and 4D) and basement car park”. As a result, we want to highlight several sections for which it appears the impacts will not be mitigated enough or addressed.

1. Significant air pollution will be caused through emissions during construction and operational phase, including particulate matter, NO<sub>x</sub> and exhaust from increased traffic due to construction vehicles and an increased number of tourists in an already densely populated area.  
Some mitigation measures like the implementation of a Green Travel Plan, totally rest on third parties, for which the developer, PA or ERA have no control. It is therefore very risky to base the residual impact on air pollution from this development, based on this assumption. Moreover even with the concept of a Green Travel Plan in place the impact is expected to be moderate to high, due to traffic increase. This points to the development being unsustainable in the current infrastructure in place in the area, which will be detrimental to the health of users and surrounding neighbours.
2. Hazardous particles entry to the coastal water body is classified as having a low to high residual impact depending on the magnitude. It appears that the EIA and the mitigation measures proposed do not offer any certainty that this impact can be avoided to the Marine Natura 2000 Site Zona fil-Bahar fil-Grigal ta' Malta. Pollutants or any hazardous, toxic or noxious substance entries into the soil as well as the coastal water body needs to be avoided under all means.
3. Light pollution will be generated during construction and operational phases of the proposed development. The current location of the proposed development is highly likely to impact important breeding grounds in the Marine Natura 2000 Site area of Zona fil-Bahar fil-Grigal ta' Malta particularly seabird colonies in the North of Malta at St Paul's Islands and Rdum tal-Madonna. There is no quantification of the impact arising from the fact that this is a multi-storey building which can be seen from distances away from the development. This is of particular concern to Malta's seabirds in the period February to October. These months were identified as breeding periods of Yelkouan Shearwater (*Puffinus yelkouan*), Scopoli's Shearwater (*Calonectris diomedea*) and European Storm-petrel (*Hydrobates pelagicus*) during which the presence of inappropriate



lighting could potentially impact individuals of these seabird species through collisions, light attraction and disorientation. Malta's seabird species return to their colonies at night with light pollution being a major threat causing disorientation of the seabirds. Collision rates could be greatly increased by unmasked, bright lights. Proposed buildings that exceed the current average building height need to adjust all artificial lights during the night since these are particularly prone to be attracted by seabirds in Malta and undermine the ecological integrity of animal habitats<sup>1</sup>. Not least since standings of seabirds have been recorded in the past in the area of Pembroke<sup>2</sup>.

Should construction be carried out during the night hours, the mitigation measure proposed of downward facing lights is not practical. Therefore the impact assessment should be revised on this matter.

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<sup>1</sup> Guidelines for Outdoor Lighting for Low-Impact Lighting, [http://www.darksky.org/wp-content/uploads/bsk-pdf-manager/RASC-GOL\\_2016\\_51.pdf](http://www.darksky.org/wp-content/uploads/bsk-pdf-manager/RASC-GOL_2016_51.pdf)

<sup>2</sup> <http://birdlifemalta.org/wp-content/uploads/2016/08/BLM-Light-Pollution-Report-2014.pdf>