



Comments on Proposed ECO-SPA & Resort in Dingli 26th April 2018

BirdLife Malta reviewed the PDS of the proposed development on PA 5732/17 “Demolition of existing licensed explosives factory & redevelopment into Eco-spa & Resort Class 3A. Development includes excavation of site for accommodation of facilities” and would like to highlight the following points.

The development lies within several protected areas, including a Natura 2000 site and a scheduled Area of Ecological Importance. Furthermore, it is located in close distance to another Natura 2000 site. The development in question is not strictly compatible with the objective of achieving a favourable conservation status for the site and its species and furthermore contradicts to several policies, including the SPED (policies to manage rural areas and change of rural character) and developments in ODZ. The proposed development furthermore requires a detailed Appropriate Assessment (AA) in accordance with the Flora, Fauna and Natural Habitats Protection Regulations of 2006 (S.L. 549.44). Accordingly, we agree with ERA’s screening exercise that demands that the development is subjected to an EIA and AA. Special regard should be made on how this development contributes to achieving a favourable conservation status for this Natura 2000 site, and should it not be able to do so, the development should be scrutinised accordingly.

We are also of the opinion that an EIA and AA should particularly look to investigate the potential impacts the development might cause on the Natura 2000 sites from these matters:

- a. While the PDS describes the need for a certain amount of parking spaces, there is no information regarding the anticipated number of visitors to the site. This can create significant amount of traffic which one would need to investigate how access routes to the area will be affected. Moreover increased traffic will bring along associated impacts relating to air quality, light pollution and noise pollution. A traffic impact statement should be explored.
- b. The PDS does not delve into the light pollution aspect it may introduce to the area. While it is assumed that the area does not have much illumination, it is without doubt that both construction and operational phases of the development will cause illumination at night which can overspill to other areas. Accordingly an EIA should look into the exterior and interior lighting and how this will be affecting sensitive receptors such as the sea cliffs (Which are designated as SPAs for seabirds) near and far. Far receptors could include areas such as Ta’ Cenc cliffs and Filfla SPA for which any considerable illumination from this site may be perceived at such distances.
- c. No overview of policies and how this development adheres to or goes against, has been looked into sufficiently. The EIA should present a comprehensive outlook of all policies this development would relate to.
- d. The lack of alternative sites by the developer lacks suitable justification to omit such an exercise. If the developer is into re-developing extant sites, there should be plenty of considerations across Malta and Gozo, which would not be necessarily sited within Natura 2000 sites or ODZ area. An alternative site assessment should be part of the EIA exercise.

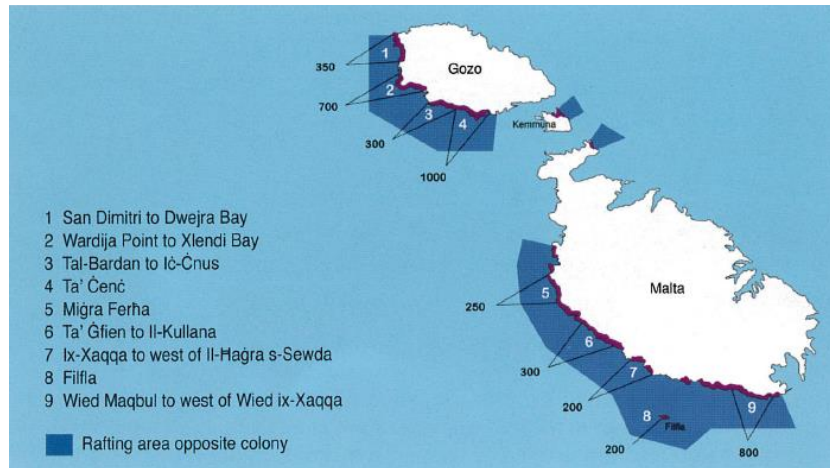


Figure 1. Scopolis shearwater distribution in the Maltese Islands (Sultana et al. 2011)