



**Comments on PA 6044/17 Demolition of former Grand Hotel Verdala and
development of residential complex and hotel.
13 July 2018**

BirdLife Malta reviewed the Project Description Statement (PDS) for the proposed development and would recommend to include the following points in the Terms of Reference of the EIA:

- As pointed out in the PDS, an increase of traffic will be generated during construction and operational phase of the project. Long-term traffic generated during construction need to take into account that Buskett is located close to the proposed site. Buskett is a Special Area of Conservation within the EU Natura 2000 network. As Malta's only semi-natural woodland, Buskett is an important conservation area for many local species including birds providing an ideal habitat for migratory birds to find food and seek shelter. The area is a popular site for visits during the weekends already generating dense traffic that leads to increased noise and air pollution. In the ToR for the EIA we recommend to examine whether the road network is capable of catering more traffic without imposing a threat to the area's environmental sensitivity. A Traffic Impact Statement should be presented with the EIA.

- It is proposed that the development will have eight levels of accommodation resulting in a maximum height of 25.70m. Maximum height limitation in this area of Rabat is three-storeys plus semi-basement which results in 17.5m. Given that high buildings contribute to increased light pollution with a wider radius and lead to brightening of the night sky as well as the level of generated noise, the EIA needs to analyse the impact on surrounding areas, with a particular focus on Buskett, as a sensitive receptor. The EIA should delve into requesting photomontages of the proposed development, including modelling the development's contribution or otherwise to skyglow in the area. The external lighting resulting from this development should be modelled, presented in photomontages, as well as its impact assessed.

- We are of the opinion that the ecological, agricultural and land use impacts of the proposed development are assessed, given that the proposed development is up taking ODZ land and non-developed land (11% of the proposed development site lies within ODZ). The development furthermore needs to be screened in terms of its conformity with planning policies.