



Comments for scoping exercise concerning PA 2467/16 - Proposed Elderly Home at Buskett l/o Dingli 04 October 2018

BirdLife Malta has reviewed the Project Description Statement (PDS) for the proposed development and has also attended the scoping meeting organised by ERA. Based on the information provided we see the following as necessary aspects to be included in the Terms of Reference for an EIA for the proposed development.

The proposed development is located just a few metres away from the border of the Buskett Special Area of Conservation of International Importance which is also protected by various designations for its importance to flora, fauna and habitats – an Area of Ecological Importance, a Site of Scientific interest and a Tree Protection Area. Despite the development being just outside the border of this designated area, the development is within the catchment area of Wied il-Luq which is vital for the longevity of various Buskett ecosystems, with the potential that any impacts within the development site or to its close proximity may have repercussions downstream affecting the whole Natura 2000 site. As a consequence we deem that this development should be screened for a full EIA as well as an Appropriate Assessment given the location of the proposed site and its proximity to such a sensitive habitat.

Apart from the above reasons, and as was explained during the scoping meeting, the proposed development is expected to take up arable land which is currently not developed and is situated within the perimeter of the delineated planning application. As a result such development should also be screened in terms of governing policies for the area, given the development will not simply occupy the already committed site, but extend into arable land that is strictly speaking ODZ. Arable land around Buskett acts as a suitable buffer to the SAC, and this shall be compromised by the development. The potential impacts section especially with regards to possible ecological impacts is not credible in the Project Description Statement and does not carry much weight given the author of the PDS is not an ecologist. Statement 10.9 in the PDS does not conform to the site plans as compared to the current layout of the existing building given the Planning application delineation extends into arable land. The fact that such an area may not necessarily be occupied by a building, does not mean that such an area will not be less compromised from its current state, or state of land use. Otherwise it would be understood that the developer would have not shown interest in the area including it within the development border.

The site is currently largely in disuse and accordingly is currently generating little if any traffic to the area or parking necessities. During the scoping meeting, a Traffic Impact Statement was mentioned as having been carried out, yet such a document is not available on the planning authority's e-apps site, and no indication have been provided as to how old such a TIS may have been. In this regard, given that most of the traffic accessing this site will pass along the border or within the Buskett SAC, a fresh TIS should be submitted for ERA's consideration, and should take account of amenity value of Buskett which by itself generates traffic.

A number of excavations appear to be needed at the site to accommodate the full scale of the development. Rock cutting is expected to generate vibrations, construction waste and traffic to carry



such material, as well as dust which will be an issue concerning the proximity of the water course and the Tree Protection Area. The impacts of such activities (as well as the demolition and construction) should be fully evaluated in terms on their impact on the ecology, the hydrology, hydrogeology and air quality on the Buskett SAC. The timing of such activities needs to be specified and evaluated accordingly. It is unclear whether the development shall affect any important aquifers in the area although it is likely that any effluents or leaks will also impact the Wied il-Luq watercourse and other water bodies underground or overground.

The Buskett SAC gains its importance as a bird sanctuary owing to the limited light and noise pollution the site is subjected to, especially during peak migration periods and breeding seasons for certain protected species. The developments' emissions in terms of noise and light need to be evaluated for both the construction and operational phases of the project. Such impacts may be direct from the development itself and the activities carried out within or in the outer parts, or may result indirectly from traffic and services being rendered to the facility.

The very need for elderly housing in this area of Malta is also unclear in the PDS, and how this somehow may be of benefit or detriment to the communities in the area. A social impact statement should be demanded given the development anticipates practically an increase in the population of this rural site which will have spillover effects to existing communities of Dingli, Rabat and Buskett.

BirdLife Malta reserves its right to comment on the outcome of the EIA and AA studies at a later stage, depending on the presented environmental impacts and their proposed mitigations.