



Comments on Proposed ECO-SPA & Resort in Dingli EIA and AA 9th January 2019

The proposed hotel development is located within ODZ and exceeds the footprint of the existing building on site which is being redeveloped. This is in breach of ODZ policies. We understand that the EIA has considered the impacts of the proposed footprint, however this does not change the fact that the proposed development goes against set policies. The Planning Board has the responsibility to consider this in their decision making process. From our perspective, there is no justification to increase the building footprint of the proposed development at its current location. Natural areas are rare, and Malta's surface has been build up to a great extent (30% is artificially covered). The proposed development is planning to convert pristine land into covered one, which creates even more pressure on the natural environment for instance due to soil sealing and increased creation of flooding.

In our original submission, we have highlighted that the development is disregarding local policies. The proposed development falls within or is located adjacent to environmentally sensitive sites protected under several schedules, namely:

- Natura 2000 site (Rdumijiet ta' Malta: Ir-Ramla tac-Cirkezza sal-Ponta ta' Benghisa MT0000024) and;
- Natura 2000 site (Rdumijiet ta' Malta: Ras il-Pellegrin sa ix-Xaqqa (MT0000032 SPA).

Furthermore, the proposed development is not in line with several objectives of the SPED, namely:

- Policy TO1 aims to ensure that socio-economic developments are met whilst protecting the environment and ensure that rural areas are not exploited by uses, which are not legitimate or necessary.
- Policy RO2 aims to identify and manage key rural areas popular for informal recreation and protect them from deleterious and incompatible uses.
- Policy RO4 aims towards reusing existing structures may be considered provided that these are restored in a manner to be compatible with the rural character and prevents formalisation in the countryside.

The fact that the sites' environmental integrity cannot be fully guaranteed and ecological characteristics cannot be protected but actually several environmental features will be irreversibly destroyed should dismiss the proposed development for further consideration of approval.

The mitigation measures provided in the EIA in this regard, do not justify the fact that these policies will be breached. Furthermore, we do not agree with the consultants' conclusions that disturbance, loss and damage to habitats and wildlife are evaluated as "minor" under the condition of good construction practices and monitoring of works (e.g. loss of rubble walls, damage to several species including garrigue, damage caused by access of vehicles and visitors, and impacts of noise, light and vibration). We consider the mitigation measures proposed in this regard as insufficient due to (1) imprecise

description of measures and how these will be enforced, and (2) due to the fact that irreversible habitat impacts will continue during the operational phase of the development due to increased human interaction from hotel guests.

Even if it would be guaranteed that these mitigation measures would be suitable to prevent loss and destruction of habitat, this again does not justify that the above-mentioned policies are breached.

Furthermore, appendix X Avifauna does not mention the approximate distance of the proposed development to important nesting sites of Scopoli's Shearwater along Dingli Cliffs and disregards potential disturbance that this development might cause for these birds in terms of light and noise pollution. In fact, the EIA is not looking into potential impacts on the species at all and therefore an inclusion the specifically protect the species is completely lacking. Mitigation measures of impacts from light pollution during the construction phase was disregarded in the EIA. Should the proposed development be further considered, it is important to not carry out construction works that cause major light, noise and vibration disturbance during the months of September to December (fledging period of Scopoli's Shearwater along Dingli Cliffs).

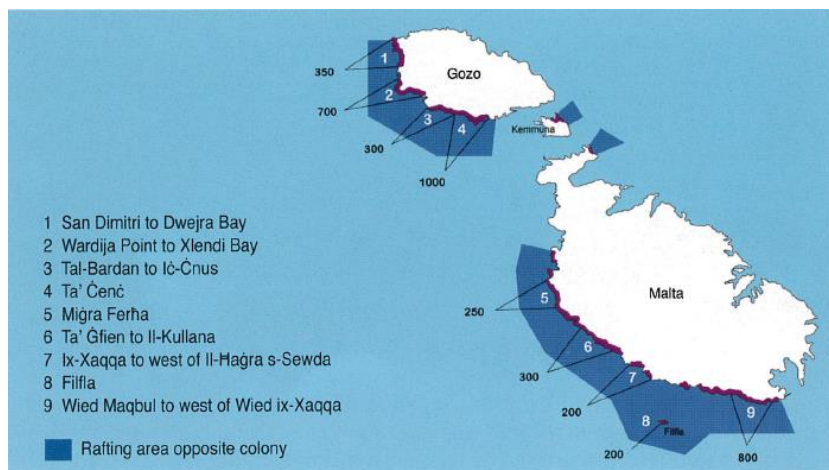


Figure 1. Scopolis shearwater distribution in the Maltese Islands (Sultana et al. 2011)

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 fact has still not been discussed in the EIA, however, a significant amount of traffic will be created in an area that is not facing much traffic thus far. There is an urgent 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 before further considering the proposal.

The absence of alternative sites by the developer still 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.



After reviewing the EIA and AA, BirdLife Malta objects to this proposed development and urges the Planning Authority and Environment Resources Authority to dismiss the proposal on the basis of the following:

- a. The development is in breach of various policies and uptakes ODZ land larger than the original footprint of the old fireworks factory;
- b. Such uptake of land cannot be mitigated by any means or measures as it constitutes a change in land use within a Natura 2000 site;
- c. The impact assessment disregards the potential impacts on shearwater species for which the nearby cliffs are designated as SPAs;
- d. Despite highlighting the need at scoping stage, there is no evaluation of the impacts related to traffic that will be generated by the proposed development. The secondary impacts as a result of visitor and vehicle flow are completely not considered.
- e. No alternative sites for this development have been considered, but rather this development is focusing on the uptake of land within a Natura 2000 site as the only option.