



BirdLife Malta's comments on PA 05952/21

The redevelopment of the seaside lidos belonging to the Sunny Coast Hotel, Luzzu, and the Seashells Resort at Suncrest Hotel

28 September 2021

BirdLife Malta has reviewed the documents submitted in relation to the PA 05952/21 and we would like to provide our comments.

Although the site is located within the Urban Area, it occupies more than 13,000 m² which we consider as a significant footprint. The redevelopment includes demolition of certain existing structures and the construction of new ones, which is expected to generate a large amount of waste. Therefore, we insist that such a development should be screened for an Environment Impact Assessment as per relevant legislative requirements. The nature and scale of the development is such that this may cause detriment or nuisance to residents, the adjacent marine environment and is in proximity of Natura 2000 site and Special Area of Conservation - Salina. Therefore, the following impacts need to be ascertained prior to the development being given further consideration:

- a. Waste management: The development shall produce a significant amount of construction waste. We would like to suggest working out a sound waste management plan, with an idea to prioritise the reuse of the construction waste on the site. Waste routes to identified waste deposits need to be worked out and assessed along with the capacity available to intake the required volumes. Should the development involve any routes via maritime transportation, the end destination of such waste also needs to be determined and assessed.
- b. Noise and vibrations: During the demolition/construction phase, the site is likely to become a source of vibration, noise and light pollution potentially affecting the Salina SAC site. Salina Nature Park is a Natura 2000 site protected under the Habitats Directive, hosting a variety of local and migratory bird species. The negative impact of noise and light pollution should be assessed and mitigation measures provided at all times. Particularly sensitive period is the breeding season which lasts on average from March to June. The adverse negative impact could be mitigated, particularly, through the construction/demolition happening at non-sensitive periods (outside breeding season), and by establishing a baseline which should not be exceeded. The impact of such noise and vibration to residences and other commercial outlets in the area should also be assessed in terms of health concerns which might be an issue, accentuated further with the durations of the demolition/construction phases of the development.



- c. Silting and dust deposition: With such a development being in close proximity to the sea, the impact of the demolition/construction phases over the possibility of dust deposition and silting of marine and coastal habitats need to be assessed clearly with safeguards put in place to minimize such an impact as much as possible. Silting from the site may be carried over to Salina Bay and Salina SAC area affecting the marine ecology and the conservation potential of the area, as well as the area's amenity value in terms of bathing, recreational fishing, etc.
- d. Light pollution: It is important to reduce and avoid light pollution whenever possible both during the construction and the operation phase of the project. Emitted colour from installed lighting should be evaluated in terms of its emitting temperature. The recommended light level in urban areas is CCT < 3000K, however in such a sensitive coastal area, we recommend to lower it down to < 2700K. All measures should be taken to avoid glare and over-illumination on the site. A feasible and sound lighting scheme which would be aligned with the environmental guidelines should be prepared, especially in consideration of the relative and cumulative impact the development might have with the Qawra/Bugibba coastline being already an intense source of coastal light pollution resulting in yearly seabird groundings in the area.
- e. Traffic flow and impact: The developer also plans to establish a new vehicular access which means the Annual Average Daily Traffic (AADT) should be calculated and the impact of possibly increased traffic on both the road infrastructure and the residential units should be assessed. During the construction we recommend to align with the best available environmental practices to avoid excessive noise, vibration and dust generation in the area.
- f. Landscaping: We have also noticed that the project includes felling of trees. In this context we suggest referring to the Guidelines on Trees, Shrubs and Plants for Planting and Landscaping in the Maltese Islands (2002) to make sure all possible measures are taken to safeguard protected trees and compensate for the lost vegetation. As much as possible the vegetation should complement what would be expected to be naturally occurring in such an area, so as to complement the limited yet still possible natural value of this coastal area in proximity of a Natura 2000 site.