



## Comments on EA00004/20 - Redevelopment of Mellieħa Bay Hotel, Triq il-Marfa, Għadira, Mellieħa

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BirdLife Malta has reviewed the Project Description Statement (PDS) and would like to highlight the following points to be considered for drafting the EIA Terms of Reference.

General comments:

- The area occupied by Mellieħa Bay Hotel and its grounds covers a total of 167,000 sqm which were given to the hotel as an Emphyteutical grant in 1963 for touristic activities for a total of 95 years. The existing Ground Floor Area (GFA) is of 26,705 sqm. While according to the new layout, the GFA is going to reach 61,008 sqm.
- Proposed development will increase the footprint (build-up area) up to 19,170 sqm (almost triple). The maximum height will increase from 33 m to 40 m.
- ***We recommend that the EIA investigates therefore fully the changes in such a development accordingly to relevant policies and local plans.***
- According to the North West Local Plan, the site is located within the Area for Restrained development and Outside the Development Zone. Also it is partly located on an Area of Ecological Importance and Area of High Landscape Value.
- The northern part of the site is mostly undeveloped (inactive agricultural land, garrigue and afforested area). To the west, the site's boundary adjoins Special Protected Area, Special Area of Conservation (International Importance) and Bird Sanctuary (Foresta 2000 and Ghadira nature reserve). On the coast, the site is adjacent to Marine Special Protected Area (the coastal waters of Mellieħa Bay) which is part of European Natura 2000 network. In close proximity to the eastern boundary of the site, there is Rđum tal-Madonna cliffs area where the largest colony of Yelkouan Shearwaters breeds.
- ***For the reasons mentioned above, we demand that the EIA considers the ecological impact of the proposed development.***
- As to geology and geomorphology, the PDS says the demolition stage will take at least 5 months and the excavation 4 months. The developer is planning to excavate as much as 150,000 m<sup>3</sup> of rocks (gravel/torba) which can lead to possible negative impact on geomorphology of the area, massive dust and waste generation. Blue clay formation underlies the site, while the developer is planning to conduct hard landscaping and excavation. ***A geological and geomorphological***



- ***assessment is therefore being recommended for the development, including any potential effects vis a vis aquifers in the area.***
- Demolition and excavation works as well as transportation of waste during the construction phase will be a significant source of noise and vibration. This type of pollution can lead to disturbance of the largest colony of Yelkouan Shearwaters nesting on the cliffs within the close distance from the site (Rdum Tal-Madonna area), especially if mentioned activities are occurring during the breeding season (January-July). Additionally, Black-winged Stilts, which have chosen Ghadira nature reserve as their breeding habitat, can also be disturbed by the noise and vibration (their breeding season lasts from May until July). ***A thorough assessment of potential noise pollution impact and vibration should be therefore assessed with respect to sensitive receptors which in this case are the Rdum tal-Madonna SPA, and Ghadira SPA.*** It has to be noted that Yelkouan Shearwater activity has in the past been recorded as close as to Slugs Bay at the Rdum tal-Madonna site, therefore the site in its entirety needs to be considered as a sensitive receptor. Vibrations to shearwater colonies should be assessed in terms of perceived vibrations which can disturb birds at their nest, as well as possible causation of rocks falling blocking nests/burrows.
- According to PDS, the whole period of demolition/excavation/construction works is going to take 2,5 years and construction is planned to be finished by 2023.
- It is proposed that there will be additional car parking areas accommodated, both on the surface and underground level, at the same time underground parking area will offer up to 130 places, while surface parking area additional 65 places.
- The Annual Average Daily Traffic (AADT) has been calculated to reach 333 vehicles.
- Considering the increase in traffic load due to development (both during the construction and operation phase), ***we also believe that a traffic impact assessment should be included in EIA.*** This should particularly evaluate the impact increased traffic may have on both road infrastructure, assess any necessary upgrades that are needed, and evaluate the related impacts such traffic may cause with respect to residential units, Ghadira Bay and Ghadira Nature Reserve.

Our concern is that the proposed development may cause following issues:

- Care in proposed lighting scheme to be used during the operation phase seems to have already been considered by the developer. Nonetheless we recommend ERA also considers the impact of the lighting scheme to be adopted during the construction phase of the project which might necessitate the installation of various bright lights on the construction site which might still be



impacting. The environmental impacts of light pollution on seabirds can range from various sub-lethal effects, such as changes in biochemistry or behaviour, to the direct cause of mortality – these effects are particularly strongly within the marine environment. Yelkouan Shearwaters carefully select their breeding sites according to various parameters, including darkness, so increased light pollution in the area will have drastic impact on seabirds, as well as other bird species, which is why we see urgent need to assess it in EIA. Apart from seabird colonies such as those at Rdum tal-Madonna SPA, light pollution might also be detrimental to other receptors such as Ghadira Nature Reserve. Skyglow contributions should be considered and avoided.

- Dust generated during the construction phase (including through the transportation of construction waste from the site) can affect ambient air quality and as consequence badly influence human health. Moreover, dust can have negative impact on vegetation, habitats and coastal water quality. Taken that Ghadira nature reserve and Foresta 2000 are located in close proximity to the site, potential environmental impact needs to be assessed.
- Construction waste management scheme shall be assessed also, particularly the way of waste transportation from the site should be outlined. Depending on it, possible negative impacts are to be quantified. In case of on-land transportation, there will be an increased traffic load, vibration and dust pollution in the area. If the waste is transported by sea offshore, the developer will have to build an additional infrastructure along the coast, in which case environmental impact on coastline as well as surface water quality shall be assessed. ***In case any additional infrastructure is placed on the shore, the possible repercussions of wave dynamics and refractions with respect to Ghadira Beach shall need to be assessed, given a past of mismanagement across the bay which has contributed to significant erosion of the beach over the past decades.***
- The caravans which used to be parked next to the MBH have moved to the car park next to Ghadira Nature Reserve since the site was closed in November 2019 for redevelopment. This is causing more disturbance in the area and will be detrimental for breeding species with the Nature Reserve, such as the Black-winged Stilt during the breeding season and various other migratory species during the rest of the year. An alternative site should be determined to prevent illegal parking of the caravans, as this is urgently required before spring migration commences and breeding pairs arrive.
- The Northern part of Malta has been lately a subject to developments, for instance, in the area close to the site the following developments has been initiated: Malta-Gozo tunnel, Sand Replenishment of Ghadira Bay (PA 01820/18), Ramla Bay Resort Redevelopment (PA 02943/19). Therefore potential cumulative effect is to be quantified and considered in terms of EIA. ERA should request and receive clear clarifications on whether such projects will be executed and therefore considering this development in the light of other potential impacts caused by such projects.



- The developer has a plan to conduct soft landscaping, particularly planting trees and shrubs, with the area affected by soft landscaping to be as much as 12,300 sqm. Together with that, hard landscaping is also proposed on the site, although the area that is to be affected is not specified in PDS which needs to be clarified.

## Conclusion

Based on the information provided in PDS the proposed development is believed to create a significant environmental impact on the area, as it may cause the increase of light and noise pollution, vast generation of dust and construction waste, which can lead to contamination of the ambient air, water and land surface. In turn, light and noise pollution can negatively affect breeding and/or migratory behaviour of various bird species in the area. Taken that several SACs and SPAs are located nearby the site's area, we urge that a thorough calculation on possible negative impacts on them should be carried out.

The following assessments are therefore being recommended as part of the EIA:

- Development assessed for its conformity or otherwise to plans and policies
- Ecological impact assessment with respect to site and surrounding areas not excluding Ghadira SPA
- Geological/geomorphological assessment
- Noise pollution to surrounding areas not excluding Ghadira SPA (during both construction and operational phases)
- Vibration impact during both construction and operational phases to consider receptors as far as Rđum tal-Madonna SPA and Ghadira SPA
- A traffic impact assessment to predict future traffic flows in the light of other major developments in the area (both for construction and operational phases) including provisions for caravan areas which have been deviated as a result of the development and are impacting nearby N2K sites
- Exterior lighting scheme assessment for both construction and operational phases
- Impact on air quality and dust generation (both construction and operation)
- Clear indications concerning possibility of onshore infrastructure and how this could affect wave dynamics at Ghadira Bay
- Cumulative impact assessment
- Landscaping specifications

ENDS