



BirdLife Malta's comments on EIA on PA/04777/20 redevelopment of the Comino hotel and bungalows  
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BirdLife Malta has been following closely the EIA process on the redevelopment of the Comino hotel complex stretching over both San Niklaw and Santa Marija Bays on Comino, providing its recommendations at scoping stage in April 2021<sup>1</sup>. It has also attended various meetings organised by the developers and their consultants and also the public presentation of the EIA report more recently on the 4th November 2021. Having understood the complexities of the project and having also reviewed the documents presented for public consultation regarding the EIA and the AA, and its anticipated impacts and proposed mitigation measures, we would like to express our concerns with regards to the proposed development as follows.

It has to be mentioned that the hotel does present an opportunity to re-establish a touristic amenity within a very particular location of the Maltese Islands. As such the location of the land which has been leased and passed over to the developers is to be considered a privilege and an opportunity to make amends on mistakes of the past carried out in this location. That Comino Island has potential for the restoration of its habitats to a pristine state or a favourable conservation status (as so demanded for Natura 2000 sites) cannot be stated enough, and therefore it goes without much pretence that such a development is expected to seek to lessen the impact exerted by its previous structure and aim towards a more sustainable approach to tourism on this island.

***Hotel's increased footprint including a new 'village' at Santa Marija***

However, we very much see that the development and the EIA afforded to it, do not delve much into the issue of carrying capacity for the island or how this can somehow be managed sustainably. Looking at the proposed capacity of the hotel, we note an increase in the capacity of guests to the main hotel complex (from 100 to 144), as well as an increase in the number of bungalows on the developed flank of Santa Marija Bay (from 13 to 21 bungalows), even proposing these to be privately owned thus essentially resulting in a potential residential population on the island (from 0 to a maximum capacity of 130 in the bungalow village), excluding the contingent of circa 140 employees to be running the hotel complex at its full capacity. Essentially the development shall be creating a village at Santa Marija Bay consisting of privatised residences, a restaurant, a store, etc.. The Santa Marija village shall also be serviced with a pier of its own which will inevitably bring more maritime traffic or even parked vessels to the bay to be accessed or service the residents in the area.

Naturally such an expanded footprint shall exert a diffused and greater impact on the immediate and surrounding environment of Comino, and which ultimately exerts a huge residual impact along with all the associated impacts this will bring when the complex would be fully operational at its peak capacity (144 hotel guests + 130 residents in bungalows + 140 employees = 414 persons). We understand it is in the hotel's interest to maintain activity all year round as opposed to the last of the hotel's operations.

The Gozo and Comino Local Plan explicitly states in policy GZ-Ghjn-8 that "There shall be a general presumption against the further development of built facilities on Comino which entail additions in height,

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<sup>1</sup> [https://birdlifemalta.org/wp-content/uploads/2021/09/Comino-hotel-comments-scoping-stage\\_BirdLife-Malta.pdf](https://birdlifemalta.org/wp-content/uploads/2021/09/Comino-hotel-comments-scoping-stage_BirdLife-Malta.pdf)



extent or intensity of use of existing or proposed facilities". We have noted that **the footprint of bungalows will increase by as much as 3,697 sqm**. This does not only contradict with the Local Plan, the Management Plan for the Comino SAC/SPA and the undeveloped nature of the island, but also will put an additional anthropogenic pressure on vulnerable habitats. Associated impacts thus concern lighting, noise, transportation, waste, energy use and all other impacts one would expect by introducing human activity at a larger scale than what Comino has experienced in recent years. **We have our doubts that the proposed use for the area is within the carrying capacity of the island and strongly recommend to withdraw the existing plan on expanding the "Village" and propose a solution which would not compromise the conservation status of Comino.**

#### ***Hotel's increased and unquantified visitors***

Apart from the guests, employees and proposed residents to Santa Marija 'village', the complex shall inevitably attract an unknown potential number of day-visitors which might make use of the hotel's services (restaurant, pool, etc) to which no figures or estimates can be found in the studies presented, despite the hotel being proposed within what is essentially a nature reserve. Will the hotel complex attract a spill-over of day-visitors from Blue Lagoon (estimated up to 5,000 persons a day during the summer peak) or shall it attract further more visitors to the area, given the increased accessibility being proposed through the construction of piers at both Santa Marija and San Niklaw Bays. The piers may automatically act as anchor or parking points to an ever increasing contingent of privately owned vessels by the general public, and thus there is a real risk that the piers themselves bring in an even higher number of visitors to the area.

It appears the EIA does not delve into quantifying the visitors that will utilise the area, or project how this might influence the carrying capacity of the island or particular areas of the complex as a result of this development. Such estimations are crucial in determining the impacts during the operational phase of the development, especially to sensitive receptors within proximity of the complex (such as seabird colonies, Santa Marija beach, Santa Marija wetland, etc).

With certainty, footfall is expected to increase in the area. The impact on sensitive habitats due to **trampling** from the hotel guests is assessed as minor to insignificant which we believe requires reevaluation, with special attention paid to such vulnerable habitats as *West Mediterranean clifftop phrygas* and *Thermo-Mediterranean and pre-desert scrub* which tend to recover slowly after damaging. The impact on the sand dune of Santa Marija bay which is a rare habitat in Malta has not been thoroughly assessed either.

#### ***Impacts on Santa Marija Bay wetland***

Incidentally the hotel complex is proposing an expanded footprint within proximity of the Santa Marija wetland, a coastal wetland with great restoration potential which is currently the subject of applied measures by ERA and Ambient Malta in line with the Natura 2000 Management Plan for Comino. While works on the restoration of the wetland in Santa Marija are in their initial phases, the proposed development is expanding its footprint with additional bungalows to a number and configuration which shall establish a residential population to a previously uninhabited site.

The privatisation scheme proposed by the developers adds insult to injury in this regard as rather than keeping the responsibilities of any would-be compliance to a sole lessee, this could potentially be increasing such 21-fold, with buyers potentially having various entertainment or land-use interests than the developers behind the proposed planning application. The mitigation measures proposed in relation to noise and light pollution impacts on shearwater populations at Santa Marija caves, and other impacts associated with an unknown number and intensity of visitors to the area, and their potential spill-over to the beach and wetland area; are therefore rather unpredictable in such a context and should be considered as being potentially major negative.



Therefore, it is vital to reconsider the expansion and design of the “Village” and reduce its impact on the vulnerable surrounding environment. The ‘village’ should not occupy any larger footprint than what it currently occupies, and it should definitely not expand in the direction of the wetland area, which shall compromise the restoration potential of this wetland.

Beyond the impacts expected from the expanding footprint of the bungalows, other impacts are evident and not stressed enough in the EIA:

- a. The development shall have a concrete batching plant and possible storage areas for soil and other materials close to the wetland area. Such should be avoided at all costs as any movement of such materials and the risk of spill over of such materials into adjacent area is too great.
- b. Excessive rainfall, wind and other elements will inevitably cause run-off or transportation of such materials to the wetland which is the subject of restoration efforts. The siting of such materials should therefore be located on already committed or impacted areas as far away as possible from the wetland area or any sensitive habitats.

### **Ecological impact of the development**

Whereas the possible impacts on the ecological assets of the area are assessed, the resulting impact is classified as being lower than anticipated on the basis of a suggested reduction in the footprint of the development and strict adherence to a construction management plan. The effectiveness of CMPs depend on the tenacity of enforcement efforts on the construction company and diligent monitoring of permit conditions. While situations at other major development sites prove that such measures do not strictly materialise, the sensitivity of Comino and its ecological importance are too high for risking the basis of such impact assessment on the assumption that such will be implemented. The developers have so far not committed to reducing the footprint of the site. Accordingly, we suggest that the EIA takes a more conservative approach on what would be the real impacts and what is at risk with such a scale of development on Comino.

### **Transport and transportation of waste and other materials between San Niklaw and Santa Marija Bay**

The proposed use of the dirt road linking both sites for the movement of machinery and materials between the two sites will cause an increased impact and effect to surrounding habitats, which is already experienced from traffic experienced especially in the summer months. This includes dust, noise, disturbance to fauna, scouring of road and runoff of dust and other transported materials, etc. There is a risk that heavy vehicles overspill from the construction areas causing damage to adjacent habitats as has been the case with recent works commissioned by the Ministry for Gozo to service the Blue Lagoon area. The impact of having heavy machinery moving around Comino during possibly sensitive periods for fauna is not delved enough in the EIA. The cumulative impact of such activities needs to be included and considered in the overall temporary/residual impacts, including areas which will potentially be used to house such machinery off the site.

### **Excavation of boreholes for geothermal energy**

We note that the geological assessment of the site is limited to coring done for up to 3m depths, whereas the proposed boreholes to provide geothermal energy may go up to 150m depth. It is unclear whether the EIA has based its predicted impact on the geology and hydrogeology of the site on the bases of the rock profiles or predicted geological profile under the hotel’s footprint. Given that up to 145 boreholes of such a depth are proposed for the area, any hydrogeological impacts should be ascertained including any changes that might influence the hydrodynamics of Santa Marija wetland.

### **Removal of public amenities**

**Public toilets**, located within the boundaries of the site at Santa Marija Bay are planned to be removed. The removal of such a convenience will indirectly cause an impact on the nearby habitats including the wetland area, as is evident from the current operational camp site which is surrounded by human waste all around it.



The developer should not cut the provision of such services even if these are currently located within the leased premises, but should ensure such basic amenities continue to be provided, without the need to impact any more footprint than what is currently utilised.

### **Impact on marine ecology**

As mentioned previously the nature and siting of the different parts of the development plus the improved access/parking via piers risks bringing increased pressure from visitors to both San Niklaw and Santa Marija bays, with the latter already experiencing an unsustainable amount of maritime traffic and parking in the summer months. Increasing amenities at Santa Marija Bay which will be accessible to the public will only accentuate the impact maritime traffic has on the bay, and in particular one cannot underestimate the resulting impact marine vessels may have on benthic communities as a result of anchoring at the bay. With the hotel generating and causing a further concentration of human activity in these areas, the long-term impacts on such important habitats such as Posidonia meadows may become evident in later years during the operational phase of the hotel and its bungalow village.

### **Light pollution impact**

Although the developer is proposing an ambitious and environmentally friendly external lighting plan, some concerns relating to **light pollution** remain, such as:

- the absence of envisaged measures to reduce light spill from the windows - this is especially concerning in relation to the "Village" where windows are facing the coast and the sea. The breeding colonies of Yelkouan Shearwater (*Puffinus yelkouan*) are located at close distance from the proposed bungalow area and can be negatively impacted by the light spill. Same concern applies to the proposed glass lifts and open staircases. The reference in the EIA report to previous "coexistence of the hotel and the seabird colonies" (7.24) as an excuse to favour the existing level of lighting is considered to be inadequate - on the contrary, the developer should be strongly encouraged to reduce light pollution below previously experienced levels;
- in addition, the developer is proposing the construction of two piers in San Niklaw and Santa Marija bays - extending 15m and 16.5m into the sea accordingly. The presence of piers in the area means an additional source of light which is inevitable due to safety and navigation reasons. We would like to stress that any obtrusive light should be avoided to safeguard seabird colonies and prevent the piers from becoming disorientation points.

The impact of light pollution should be assessed for the areas in close proximity to the development such as shearwater colonies at Santa Marija caves, to seabird colonies further afar that utilize the marine SPA as well as nest at colonies as far as Ta' Cenc cliffs.

### **Disturbance to seabird colonies**

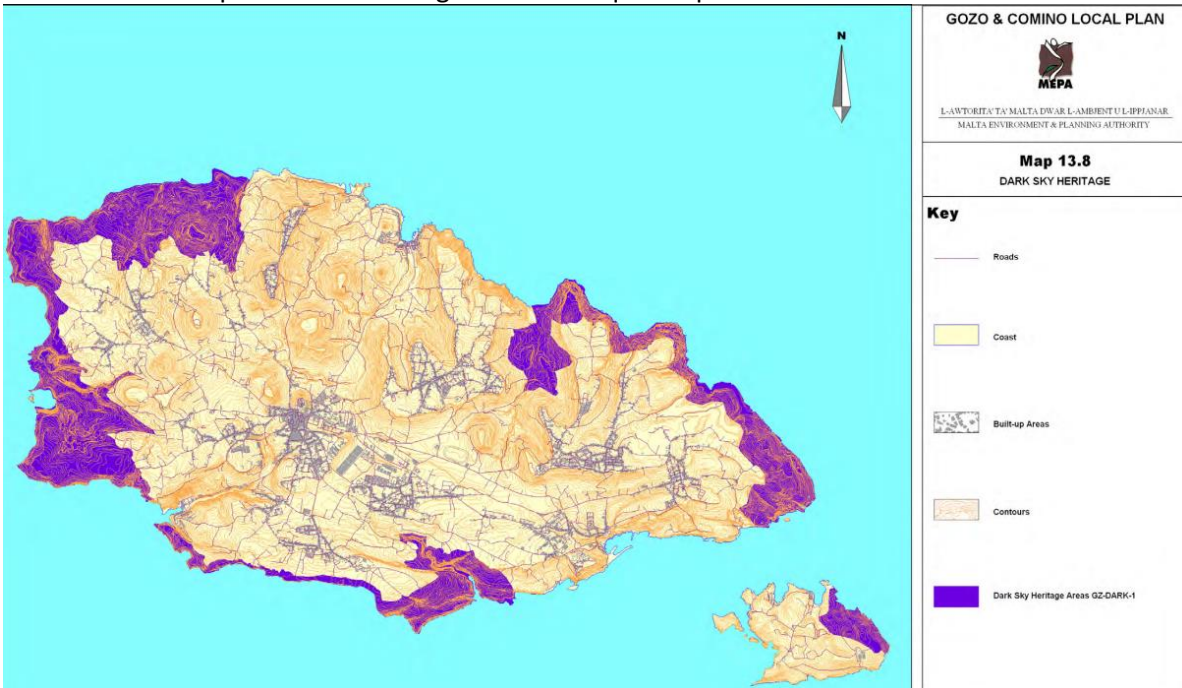
We have noticed that the key issues addressed within the EIA with regards to **avifauna** do not include disturbance due to increased human presence, especially given the location of the site. The expansion of the bungalows shall bring residential units closer to sensitive seabird colonies at Santa Marija caves. The predicted noise impact is once again depending on the implementation of a construction management plan which is not yet defined and which is prone to be not adhered to as what happens in development sites elsewhere. The proximity of increased human activity to seabird colonies can be seen in Map 1.



Map 1. Location of seabird colonies on Comino

### Protection of Dark Sky Heritage

Under the Policy GZ-DARK-1, the Local Plan also establishes the **Dark Sky Heritage** sites on Comino and Gozo. The impact of the development on these sites has not been assessed neither within the EIA nor the AA. The map below shows the Dark Sky Heritage sites, and at least 2 of the scheduled sites can be directly affected by the light pollution from the hotel and bungalows: one on Comino and one on Gozo - across the Gozo Channel as seen on the map. This cannot be ignored and requires special attention in the EIA.



Map 1. Dark Sky Heritage sites on Gozo and Comino. Source: GCLP





## **CONCLUSIONS:**

At this stage of the impact assessment and permitting process, the proposed redevelopment of the Comino hotel and bungalows appears to be causing a significant impact to the ecological integrity of the Comino Natura 2000 sites impacting efforts to obtain a favourable conservation status for this Natura 2000 site during the construction phase but especially also on a longer term with evident residual impacts, during the operational phase of the project.

The project's dimensions should be revised to lessen the impact of the development and more importantly cap the number of visitors/site users/human presence to a more manageable and sustainable number. In essence we recommend that:

- a. The hotel and bungalow complex do not overstep their footprint to what is already committed and built up – and therefore use such sites as an opportunity to develop a more eco-friendly hotel.
- b. Visitor numbers to and from Comino are re-assessed and the number of visitors anticipated to be attracted by the hotel complex are projected and planned for. Much like a traffic impact assessment quantifies the increase in traffic from a road network a similar approach should be partaken for Comino – given this is a nature reserve with a limited carrying capacity and with a great potential that if uncontrolled an increased human presence along with the means of transportation will simply spill-over and accentuate any impacts of the hotel itself. All impact assessments in the EIA should be revised accordingly where relevant to those impacts brought about by increased human presence.
- c. To not privatise the bungalow complex at Santa Marija Bay such that the mitigation measures in place during the operation part of the development remain truly and effectively manageable.
- d. To not expand the bungalow complex towards the Santa Marija wetland area as this compromises the restoration potential and ecological value of the wetland itself including issues related to disturbance, transport, noise and light from human activity brought to the area.
- e. To make all necessary adjustments to ensure there is no light spill on the surrounding environment at all times, especially from piers, windows and open/glass structures (lift, staircases); And assess the impact of additional light source (the hotel itself and the proposed piers) on the Dark Sky Heritage sites;
- f. To reconsider the value and impact of having piers accessing the hotel site during the operational phase of the development which piers will bring added maritime traffic (possible added impact on benthic habitats such as Posidonia meadows).
- g. To ensure the provision of geothermal energy does not compromise the hydrogeological characteristics and potential of area especially the Santa Marija wetland.
- h. To keep available public conveniences such as public toilet facilities at Santa Marija Bay so as to prevent fouling and waste at sensitive habitats around Santa Marija Bay.

**ENDS**

**BirdLife Malta reserves its right to make further comments, recommendations, and observations during the EIA process of such a development.**