



**BirdLife Malta's comments on the EIA report for the PA/09876/19 and
PA/01948/20 - Demolition and redevelopment of the Mellieha Bay Hotel,
Ghadira, Mellieha**

30 November 2021

BirdLife Malta attended the presentation of an EIA in relation to the mentioned planning application held online on the 23rd November 2021, and after reviewing the documents present for public consultation, we would like to contribute with the following feedback.

The fact that the site is laying in immediate proximity to the areas scheduled for nature protection, such as:

- 'Żona fil-Baħar madwar Għawdex' Marine Special Protection Area;
- 'L-Inħawi tal-Għadira' Special Area of Conservation, Special Protection Area; including Ghadira Nature Reserve protected under the Ramsar Convention;
- 'L-Inħawi tar-Ramla tat-Torri u tal-Irdum tal-Madonna' Natura 2000 site, Special Area of Conservation and Special Protection Area, the breeding site of the the largest colony of Yelkouan Shearwaters

requires a thorough assessment of possible adverse impacts the development can cause to the surrounding environment, as well as strong and sound mitigation measures taken to avoid this. In addition, the site also occupies a significant share of an Area of ecological importance, and an Area of high landscape value.

According to the EIA report, the demolition stage will take at least 4 months and the excavation period a further 6 months with the whole redevelopment expected to take as long as 3 years. Apart from bulldozers, excavators and trenchers, the developer is planning to use on site heavy machinery, such as a batching plant and a stone crusher. Demolition and excavation works, as well as, transportation of waste during the construction phase will be a significant source of noise and vibration. Such may be a cause for disturbance to the largest colony of Yelkouan Shearwaters (*Puffinus yelkouan*) nesting at the cliffs of the Rdum Tal-Madonna area, especially if mentioned activities are occurring during the breeding season (January-July). Other sensitive receptors to noise and vibration generated from the site, includes other avifauna which nest at Ghadia Nature Reserve such as the Little Ringed Plover (*Charadrius dubius*) and the Black-winged Stilt (*Himantopus himantopus*), which have chosen Ghadira nature reserve as their breeding habitats and are extremely sensitive to human presence and especially noise (their breeding season lasts from May until July). *Himantopus himantopus* is considered as an important nesting species, and is the subject of management plan objectives at the nature reserve:



- “to ensure that the range and nesting habitat of *Himantopus himantopus* (Black-winged stilt) are increased and the species becomes a consistent breeder at Għadira” (MO18);
- “to ensure that the range and population size of breeding, wintering and staging wetland and woodland birds are increased” (MO20).

Considering the above, there is a need to address the expected impacts from noise and vibrations on these breeding species of local and international importance. The adverse negative impact could be mitigated, particularly, through the construction/demolition happening at non-sensitive periods (outside breeding season), and by establishing a monitoring protocol during the construction phase of the development which established adequate thresholds not to be exceeded.

The Marine environment survey (specifically Seabed habitats survey) conducted as a part of the EIA found present on the site a number of protected species, such as *Posidonia oceanica* and *Cymodocea nodosa* which are listed in Schedule III “Animal and plant species of national interest whose conservation requires the designation of Special Areas of Conservation” of the “Flora, Fauna and Natural Habitats Protection Regulations” protected also under the Bern Convention. The fact that the developer is proposing the works in relation to the removal of some coastal infrastructure and repair of a jetty implies the possibility of a negative impact on the mentioned seagrass species. Another source of possible disturbance of *Posidonia* meadows is the laying of a discharge pipe. The mitigation measure suggested within the EIA is to avoid the *Posidonia* meadows during the construction works - which is an effective measure, however we would like to emphasize that its implementation requires thorough monitoring on site. Furthermore, we noticed that the impact from possible fuel spills during the construction and operation phases has not been assessed which is highly important not only in terms of pervasive adverse impacts on marine ecosystems, but specifically in relation to seabirds (namely, Yelkouan Shearwaters and Scopoli’s Shearwater whose colonies are located at the cliffs of i-Irdum tal Madonna). Even minor spills might affect the permeability of plumage and if such spills had to reach rafting areas off the cliffs of Rdum tal-Madonna it could spell disaster to a significant proportion of Malta’s populations of these seabirds.

We also see the need for further assessment of the impact of a new desalination plant (RO) discharge on *Posidonia oceanica*. The EIA states that the difference between the natural and expected salinity of seawater due to discharge will be around 4ppt (the salinity level of the discharge is expected to rise up to 41.8 ppt in January). We would like to draw your attention to the available study¹ which proves the high sensitivity of *Posidonia* meadows to the increase of water salinity. Particularly, based on the results of the study, it is recommended to avoid design and construction of brine discharges in areas where *P. oceanica* ecosystems occur. In case when this option is impossible, the study suggests “not to exceed neither 38.5 psu of salinity in any point of the meadow for more than 25% of the observations (on an annual basis)



nor 40 psu of salinity in any point of the meadow for more than 5% of those observations"¹. Therefore, we suggest reassessing the impact on Posidonia meadows with this respect, and ensure the monitoring of the works on site. Should the risk remain high on Posidonia meadows, other alternative solutions should be sought. Losing Posidonia meadows at Ghadira beach has ramifications not just to the area's ecosystems but could spell an effect also on the beach's morphology which has already suffered from years of erosion. Posidonia meadows do protect the beach's sand and losing Posidonia meadows could mean further erosion of the beach.

The impact on marine environment due to drilling works (installation of a discharge pipe) is described as such of minor significance, however we would like to point out that some benthic communities take longer time to recover and reestablish after being disturbed (all the more so after being eliminated). According to the research findings², infralittoral algae, some species of which have been found during the benthic survey, can take more than 3 months to recover from human trampling, not mentioning drilling. This should be taken into consideration as well as the impact of turbidity associated with discharge during the operation phase of the RO.

With regards to the lighting scheme, we have noticed that various feasible mitigation measures have been listed under the EIA. However, having proposed that "balcony lights should be controlled by guests or centrally dimmed during specific hours or periods of the year", the paragraph 8.46 does not clarify what these specific hours and periods are. This requires further clarification with the focus on reducing the light use to a minimum level during sensitive periods for seabird species breeding in the adjacent area. The EIA does not assess the light pollution impact associated with the general increase in hotel height (almost 8m), which as a consequence can lead to an increased light spill from the hotel windows. Given the location of the site, it is crucial for the developer to reassess and amend the lighting scheme, described in the EIA as "uncertain", according to the environmental standards. We strongly recommend avoiding the installation of uplighters, as well as use of luminaires for decorative purposes; we also suggest the need to use shades on windows and balconies to prevent light spill. Additionally we suggest that ERA imposes an operational permit which can be reassessed and renewed accordingly and which will assist the hotel in implementing the necessary lighting measures while setting limits which can be variable at different times of year.

Although we noted that the proposal has not been finalised, the developer is also proposing to restore the remains of the Fedeau / Qassisu Battery located within the site boundary, and

¹ [\(PDF\) Salinity tolerance of the Mediterranean seagrass Posidonia oceanica: recommendations to minimize the impact of brine discharges from desalination plants | José Luis Sánchez Lizaso - Academia.edu](#)

² [Short-term effect of human trampling on the upper infralittoral macroalgae of Ustica Island MPA \(western Mediterranean, Italy\) | Journal of the Marine Biological Association of the United Kingdom | Cambridge Core](#)



suggests “to have strategically placed lighting to accentuate the feature”. In such a case we invite both ERA and the developer to consider whether such lighting is really and truly necessary in an otherwise rural area which is already impacted by various infrastructure in the area including the proposed hotel itself. What added value will such lighting truly give to the historical or cultural value of the structure, other than the fact that the structure might not be visible at night? We are of the opinion that historical structures can equally be visually appreciated during day time, and the lighting at night will give no significant value to this, other than promulgate further light pollution. Should there be lighting in the area, this needs to be evaluated as part of the hotel’s lighting scheme and its impact assessed accordingly.

ENDS

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

Further clarifications may be sought via: info@birdlifemalta.org