

BirdLife Malta's recommendations for the EIA Terms of Reference  
for PA 05420/21 Construction of Corinthia Oasis, Triq il-Kappella Tal-Militar, Triq  
in Nahhalija, Mellieha  
25<sup>th</sup> March 2022

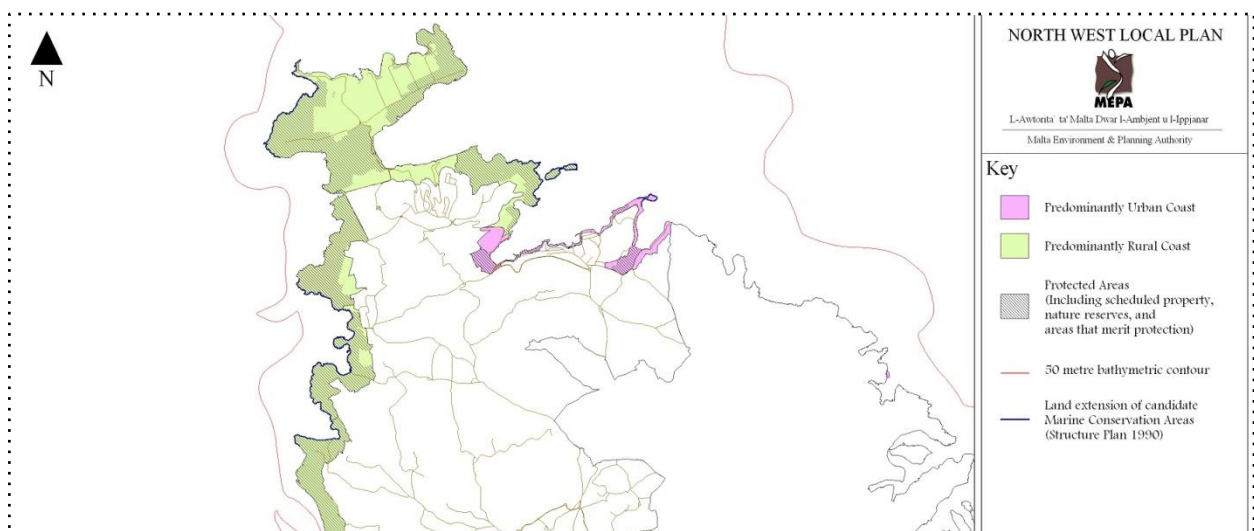
After reviewing the PDS available on ERA's website, BirdLife Malta would like to contribute to the consultation regarding the Terms of Reference for the EIA for the respective development with the following feedback.

The development envisages the construction of a 5-Star hotel and residential complex, upgrading of the road network in the Qasam ta' Għajn Tuffieħa area and the development of a surface car park on a site which has been transferred by the Government of Malta (GoM) to the Scouts Association Malta. The site area is 80,770m<sup>2</sup>, out of which the footprint of the hotel constitutes 45,958m<sup>2</sup> and the proposed residential area another 30,645m<sup>2</sup>. According to PDS, the built-up area stands for 15,580m<sup>2</sup>.

In general, the project is of such a footprint and location which evokes major concerns. The site is adjacent to:

- SCI Rđumijiet ta' Malta: Ir-Ramla taċ- Ċirkewwa sal-Ponta ta' Bengħisa (MT0000024);
- An Area of Ecological Importance and Area of High Landscape Value;
- Il-Majjistral, Park ta' Natura u Storja.

Furthermore, it partly overlaps with the Area of Agricultural Value (NWAG 1), as defined by the North West Local Plan, the potential impact on which should be assessed accordingly. In line with the SPED, the area is of High Landscape Protection, also being a Rural Coast. SPED encourages continuation of traditional agricultural use of the rural coast (SPED, Coastal Objective 1). The Local Plan outlines the strategy for the coastal areas, as follows:



Source: North West Local Plan



- ❖ At the basement of a hotel, 120 car parking spaces are being proposed, this is in addition to more than 370 car and motorbike parking spaces proposed on the parking area currently under the Scout Association. The bungalows in the proposed residential area is also proposes to each have a parking space. Considering the relative large number of proposed car parking spaces at the location, a ***the traffic impact assessment during both construction and operation phases*** should be undertaken, paying special attention to comparison between current and foreseen traffic flow during the peak season.
- ❖ The location has a number of buildings proposed for demolition within the site which have been unoccupied for some time and that may potentially host a significant number of avifauna species (especially, during the breeding season). Species such as Tree Sparrow, Barn Swallow, Blue Rock Thrush, Spotted Flycatcher, Collared Dove and Spanish Sparrow are known to frequent the site in the area with some breeding in the buildings on in the trees surrounding them. Therefore, it is important to conduct ***an ecological survey during the breeding season*** to assess the environmental impact due to potential loss of breeding bird species. Further attention should be given to any roosts of *Chiroptera* that may have occupied parts of the buildings over the years.
- ❖ The cliffs located in close proximity to the development site are known for their seabird colonies. Particularly, up to 400 pairs of Yelkouan Shearwater nest along the cliffs of Majjistral park, with other seabird species such as Scopoli's Shearwater and Mediterranean Storm-petrel also present. The marine area adjacent to the cliffs is designated as SCI and SPA (Żona fil-Baħar tal-Lbiċ) due to the importance of the area for rafting, breeding and foraging behaviour of seabirds. Therefore, due to the presence of seabird colonies, the project site is located in a highly sensitive area in terms of noise and light pollution. It is vital ***to assess the impact of another source of light on avifauna*** and work out the measures to reduce the glare, light spill and other types of light pollution to a minimum. An external lighting scheme should be assessed separately and should have the aim of reducing light pollution comparing to current levels.
- ❖ Same importance should be given to ***the assessment of noise*** with a special attention given to comparison between the current and foreseen noise levels during the demolition/construction and operation of the complex.
- ❖ Due to the potential of loggerhead turtles nesting at Golden Bay, we would also ask to include the ***assessment of vibrations*** on the beach area, both during the demolition/construction and the operational phase. Proper mitigation measures are to be proposed accordingly. An external lighting scheme should also be viewed in this regard, to not impact the potential for Golden Bay and Riviera Bay as potential nesting sites for these turtles.
- ❖ The demolition and the excavation works on the site will generate approximately 70,000 m<sup>3</sup> of solid waste. The possibility to reuse such waste on site should be considered, especially when it comes to lime-stone blocks and other materials suitable for further use. For the waste not reused on the site the routes for its transportation with minimum environmental impact should be suggested. We also suggest that ***the waste management plan*** in force during the operation phase



should be evaluated. It is important to pay special attention to sustainable organic waste management.

- ❖ Although the PDS states the average height of the complex is 2 storeys, there are buildings which accommodate higher elements (such as on the drawing of Elevation E3). ***We suggest evaluating whether such building height is appropriate within the surrounding rural and coastal context.***
  
- ❖ We would like to express our particular concern with regards to the proposed residential units zone, the fact that the villas and bungalows, being located in such an ecologically sensitive area, can be sold to individual owners creates a situation where the land use and the impact on the environment is difficult to monitor and control. There is a need to carefully analyse this issue. Alternatives sites, as well as alternative designs should be presented and evaluated thoroughly given the scale of the development and rural nature of the coast.