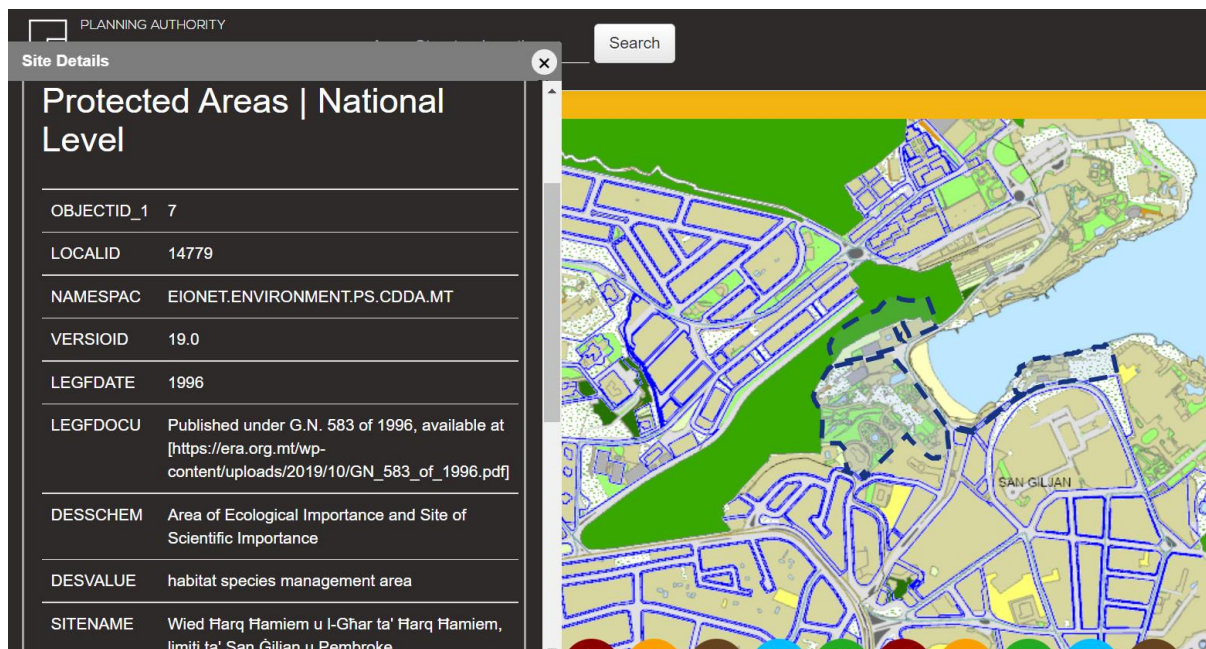


BirdLife Malta’s recommendations on the EIA ToRs for the Amended application  
to propose an iconic Tourism Complex to the already approved full permit  
PA 2478/16, San Giljan  
25<sup>th</sup> March 2022

BirdLife Malta have reviewed the PDS for the aforementioned development and we would like to contribute with our feedback below.

The proposed development in question is to occupy 237,316m<sup>2</sup> which is about 100,000 m<sup>2</sup> more than the area of the approved project. Although we appreciate that the developer included in the PDS a number of environmental considerations, including a wide public green space, we would like to express our concern with regards to such a massive construction proposed just at the side of and partly overlapping the Area of Ecological Importance and Site of Scientific Interest (AEI/SSI): *Wied Ħarq Ħamiem u l-Għar ta' Ħarq Ħamiem* which is hosting a number of typical habitats, and the site itself (namely, the gardens around Villa Rosa) is a habitat for various fauna species. We also would like to emphasise that the fact that the area is heavily disturbed by various developments should not be used as a justification to not take all possible measures to avoid or minimise anthropogenic pressure on the surrounding natural environment.



Source: Planning authority MapServer

The PDS though states that “the area is of limited ecological value” and no significant negative impact is envisaged from the development. In our opinion, this conclusion is to be drawn by ERA and exclusively after thorough evaluation of environmental impacts and mitigation measures proposed. Particularly, we would suggest including the following in the EIA:



- The height of some newly proposed buildings are of major concern (27 and 34 storeys), especially taking into consideration that those are to be erected close to the boundary with the AEI/SSI to the south. The impacts arising from this should be evaluated thoroughly and should include light pollution, shadowing, trampling, geomorphological and ecological considerations, impact on hydrological features specific to the valley, etc.
- External lighting scheme should be assessed separately, paying attention to the specifics of the sensitive natural surroundings (Marine Protected Area bordering the site from the north and the adjacent AEI/SSI to the south). At the moment, the PDS focuses mostly on landscaping lighting which we have noted, yet would like to stress on the need to develop an appropriate external lighting design and scheme, using suitable guidelines (such as Guidelines for Ecologically Responsible Lighting<sup>1</sup>) to avoid light spill on the protected areas.
- The excavation on the site of Cresta Quay with the subsequent creation of an outdoor pool and other facilities should be assessed in terms of sustainability, given the proximity of the sea. In addition, the proposed works in the Cresta Quay area need to be analysed from the point of view of integrity of the site and sustainability of the proposed development extension onto the undeveloped natural area.
- Although the PDS states the dust generation and the relating impact on air quality (namely, during the construction and demolition) is of no concern since the dust shall remain within the site perimeter, we strongly suggest including the assessment of impact caused by dust generation during the demolition and construction phase, with special attention paid to negative environmental impact on air and water quality, including the possible influence to other areas through run-off given the development is sited within a valley. The marine area in immediate proximity to the site is a Natura 2000 site Special Area of Conservation *Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u Il-Qaliet* which hosts valuable and sensitive *Posidonia oceanica* meadows including just in the harbour, therefore we specifically ask for an impact assessment with regards to this.
- Given the extensive excavation works on the site, appreciating the presence of Ħarq Ħammiem cave system as well as protected Wied Ħarq Ħammiem both bordering the site, we see the need to include the assessment of impact on geomorphology, geology and hydrology since there might be certain risk of obliteration or permanent damage to the cave system caused by the demolition and excavation works, as well as the loading of these developments on the bedrock.
- In the context of the above, we also suggest assessing the impact from vibrations, especially during the active excavation and demolition phase to evaluate potential adverse impact with regards to the cave system and valley slopes stability.

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<sup>1</sup> <https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>



- It is absolutely vital to assess the ecological impact arising from major shrinking of the ecological corridor connecting the valley and the cave due to the development, with the area of influence extending to the whole area of ecological importance of Wied Harq Hamiem.
- In line with the PDS, the amount of demolition and excavation waste shall stand for around 16,000 tonnes, and most of the excavated material is said to be reused on site. The waste management plan should be assessed, including the proposed routes for the transportation of construction waste to the approved sites. A waste management plan during operational phase of the project needs to be assessed separately, with special focus on any possible discharges to the sea (which should not be accepted) and organic waste treatment.
- According to the PDS, the development is to make a positive impact on ecology through increased landscaping. Any area would rather benefit from remaining in a natural state than being extensively landscaped, however the analysis of a detailed Landscaping plan is needed before raising any statements.
- The development shall undoubtedly generate an increased occupancy of the area, and as a consequence vehicular traffic. A Traffic Impact Statement should be prepared for the development, to include both construction and operational phases of the development, and should consider whether and if any existing or proposed road infrastructure would be able to cater for such or otherwise.
- The cumulative impact of this development vis a vis other already approved developments in the area should be assessed for all categories of the EIA. The area of St George's Bay is subject to massive development proposals which could already potentially compromise the state of geology and geomorphology rendering this development even potentially unfeasible considering all.