

BirdLife Malta's comments on the updated EIA report
in relation to the PA/02767/16; PA/08894/20 Redevelopment of an existing
derelict Delimara Bay Hotel, Triq Delimara, Marsaxlokk
23rd May 2022

After analysing the updated PDS and the Environmental Impact Assessment documentation for the PA/02767/16; PA/08894/20, BirdLife Malta would like to express our remaining concern and objection with regards to the development in question.

Despite the fact that the developer is proposing a different layout of the buildings and has reconsidered tunneling, the built footprint remains almost the same, the site itself remains in the ODZ, and also lying within the Area of Ecological Importance and Area of High Landscape Value (coastal cliffs). Moreover, the site is about to take almost twice more land (6,530 m²) if compared to the approved development, and even more if compared to the existing footprint.

The updated EIA clearly states the significance of negative environmental impact on the present habitats (such as habitat 1240/1420) which area is "already relatively small and additional pressure could significantly affect the integrity of the habitats". The state of a considerable part of habitats in the area is assessed as poor (see below) and requires special attention rather than additional pressures such as trampling, excavation, etc. Given the nature of the scheme, the footfall is likely to be increased drastically, which we believe is of major environmental concern both during the construction and operation phases in the area which hosts protected habitats and endemic Maltese species of plants (namely, *Salsola melitensis*, *Limonium melitense*).

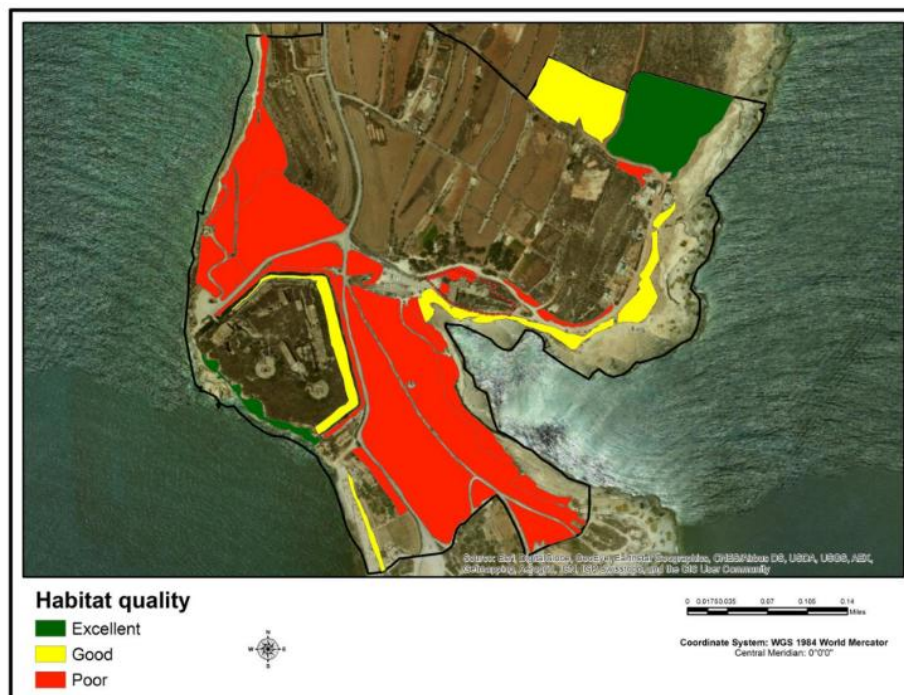


Figure 1. Map of the habitats quality, Delimara. Source: EIA, Technical Appendices



Taking into account the above, shocking is the fact that in the table summarising the environmental impacts under the updated EIA such an impact as habitat loss is defined as not significant and requiring no mitigation measures, although it has been indicated that the impact is expected to be permanent and irreversible.

At the same time, we noticed that the EIA is missing the analysis of environmental impacts on migratory avifauna which we believe is a considerable gap given that during the migratory season the area is a major stopover for different protected bird species (specifically, waders, herons, etc.).

According to the updated EIA, the excavation works are expected to have a major negative impact on geology taking into account the volume of excavated material (3,710 m³), and the fact that over 75% of it will be reused on site should not understate the environmental concerns in this regard.

In our previous submissions, we have stressed that the development is in breach of SPED and Policy MD01 which designates the area as the Delimara National Park. Furthermore, we do not agree that should the mitigation measures proposed be enacted, the residual impact can be concluded as being minor. The mitigation measures proposed rely solely on good practice (for which similar developments demonstrate this is not achievable), and in reality there is little that can be mitigated from the impacts related to increased visitors to the areas as a result of the development. Even if such was the situation, this again does not justify these policies being breached and the ODZ character of land being compromised.

To conclude, BirdLife Malta would like to once again express its objection to the proposed Delimara Bay Hotel redevelopment on the ground of its incompatibility with the set policies, as well as the nature of the site which should remain unbuilt and preserved.