



**BirdLife Malta's comments on the EIA in relation to  
PA/01123/20 Development of St. Albert the Great College  
Ghaxaq**

31 January 2023

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BirdLife Malta has attended to a consultation session held by the EIA appointed consultants, as well as has read through the EIA Reports published online by ERA as part of the public consultation process.

While we understand that the current college setup is restricted in space and scope, the applicant plans to reinstate the college elsewhere, in an area which is Outside Development Zone at Ghaxaq, and which shall occupy no less than 35,857 square meters of otherwise mostly undeveloped land of agricultural value, with a number of features of some cultural value.

The uptake of such a large portion of land which has primarily agricultural value, is not a small project but rather a large uptake of land which though not necessarily utilising the entirety of the 35,857 square metres, shall nonetheless commit this area to an educational development permanently and irrevocably.

While we have tried to deduce the understanding and rationale how this section of land has been targeted for this proposal, both the PDS as well as the EIA lack substantially and convincingly any alternative site assessment exercise. This is clearly not in line with what has been requested by ERA's own Terms of Reference as set out as scoping stage of the EIA process.

The only inferences of some site selection exercise refer to some kind of approach made to then Malta Environment and Planning Authority (MEPA) 23 years ago, where it is said that the applicant had approached MEPA with such a need, and for which MEPA identified some 12 site locations in the south of Malta. The next available reference is the 2006 South Malta Local Plan, published 17 years ago, which somewhat had established that no suitable land was available for such a development within development zone boundaries.

While the above site selection exercises remain largely in mystery, the EIA does not convincingly present any credible effort by the applicant at finding any alternatives to the uptake of this amount of undeveloped land. One might question whether in this day and age, the loss of such a vast amount of agricultural land which impacts Malta's food security, environmental and social well-being is even justifiable, at a time when current government policies are opting to create more open spaces and urban greening. In such a scenario, this tract of undeveloped land which has added agricultural value is priceless, and possibly of a high amenity value to Ghaxaq residents, being an area abutting a relatively dense agglomeration of habitations on two flanks of the proposed site.

Using the measures by which the alternative site assessment is being practically wavered (i.e., a 23-year-old MEPA exercise, and a 17-year-old local plan), the same 2006 South Local Plan



had still identified the site as a designated agricultural area. Therefore, the 2006 South Local Plan cannot be interpreted as something having sealed the fate for the proposed site.

In conclusion, after having seen the details of the proposed development and the EIA:

- We find the site selection exercise as a non-transparent exercise, and surely not satisfying the requirements of the EIA as set by the terms of reference. We invite the applicant to openly share how such a site selection exercise with the then MEPA was carried out including which sites were deemed as possible back then and why such sites are unsuitable today (if such is still the case).
- Given the context of MEPA's exercise of 23 years ago, and the scenarios prevalent at the time of the 2006 South Malta Local Plan, such an alternative site assessment should be adequately revised and updated to reflect the realities of Malta in its current state, which has seen the expansion of development zones and an increase in height of urban agglomerations. Malta's current demands (or rather needs) to have open green spaces and the need to ensure local food security via arable land cannot be measured with the same scale as that of two decades ago.
- We invite the applicant as well as ERA to consciously and truly consider all possible venues and locations that avoid the uptake of undeveloped land for the purposes of building an educational facility. A reconsideration of the design and needs of this development, with the aid of modern technology can surely result in a configuration which could possibly fit within other committed sites and possibly over multiple sites in proximity to each other if an area as large as 36,000 square meters is not wholly available. It is rather unconceivable that, to secure the education of future generations such a development seeks to deprive an open green space of agricultural value to same future generations.

**BirdLife Malta reserves its right to make further comments, recommendations, and observations during the EIA process, and at planning application vetting stage of the proposed development.**