

BirdLife Malta's comments on PA 4577/22

To demolish existing structures (Beach Club) and excavate site. Proposed construction of a new beach club, consisting of a back of house, sanitary facilities, stores, 2 restaurants having interconnected kitchen, external pools, 2 overlying Class 4D kiosks with covered seating area at promenade level and other amenities

13th February 2023

BirdLife Malta has become aware of the proposed redevelopment of the Amazonia beach club (PA 4577/22) and would like to raise a number of concerns associated with the project situated on the very coastline of San Pawl il-Bahar.

The site lies in the immediate vicinity of the marine Natura 2000 sites:

- SAC Zona fil-Bahar bejn il-Ponta ta' San Dimitri (Ghawdex) u Il-Qaliet MT0000105;
- SPA Zona fil-Bahar ta' madwar Ghawdex MT0000112.

It also borders the Area of Ecological Importance and the Area of High Landscape Value to the north.



Figure 1. Boundaries of the PA 4577/22 and the designated areas it borders. Source: PA Mapserver



Although the footprint of a new project is said to remain within the existing boundaries, the Gross Floor Area (GFA) of the club is going to increase and will conclude 7,700 m², thus increasing the weight of the building. The fact that this area is of urban character and is already densely built-up cannot be considered as justification for further intensification of its development.

Given the proximity of the development to the colony of Yelkouan Shearwaters at St Paul's Islands and the largest Maltese colony of this seabird further away at Rdum tal-Madonna, particularly concerning is the likelihood of increased light pollution in the area which is already heavily light polluted and is a source of massive skyglow. The analysis of stranded seabirds data collected by BirdLife Malta shows that the area of St Paul's Bay to Qawra point is one of the most common spots where light-induced groundings of seabirds (Yelkouan Shearwater and Scopoli's Shearwater) occur (see Fig.2). Just from the end of 2019, BirdLife Malta staff have collected 9 stranded juvenile seabirds from this area making it the leading seabird stranding hotspot in the Maltese Islands. Therefore, before such redevelopment is considered, we urge the Planning Authority to assess the project's external lighting scheme which should be in line with ERA's Guidelines for the Reduction of Light Pollution in the Maltese Islands. We strongly suggest that the developer should not just avoid installing additional light sources, but propose a scheme which would reduce the existing levels of light pollution. This has to apply both during the construction and operational phase.



Figure 2. Light-induced seabird groundings hotspots. Source: Crymble et al, 2020 (Il-Merill, vol.34)



Another concern is the increased levels of noise during the construction and operation which is likely to have an impact both on residents and the nearby seabird colonies. Such impacts should be assessed and mitigated accordingly with an idea to avoid noise pollution in the area. Specific measures to apply during all stages of the project should be designed and presented by the developer for the PA and ERA to assess their feasibility. The limit on acceptable noise levels should be established.

The redevelopment also will lead to a 11,5 m increase in height of the existing promenade which should not be acceptable on the coast. The beach club is situated right across the road from an Urban Green Space, therefore increasing the height of the building will inevitably lead to a massive change in the amenity and landscape value of the site.

The proposed works imply excavation on site, while according to the North West Local Plan the area nearby merits protection due to being a Class A Archeological Site (policy NWCO4), therefore geological and geomorphological considerations should be included in the evaluation of the project. The large volume of construction waste should be reused on site and the waste management plan should be evaluated prior to taking any decision on this development. Given the site is located on the shore line, there are chances of adverse impacts on the marine environment, particularly due to the increased turbidity during the construction phase, which should be duly addressed and completely avoided. The increased capacity of the club can also lead to heavier traffic congestion in the area, therefore we suggest the need for a traffic impact statement.