BirdLife Malta's recommendations on the Terms of Reference for an EIA, AA for PA 00437/23, Demolition of ex-Jerma Palace Hotel and construction of a mixed use resort, Marsascala

26th May 2023

BirdLife Malta has evaluated the prepared PDS for the proposed development, as well as ERA's screening report and would like to contribute to the public consultation process with regards to the ToRs for the EIA with the below recommendations.

Judging by the size of the proposed hotel, the number of people it shall accommodate, as well as its immediate vicinity to the sea, we can expect a number of negative impacts on the environment.

Firstly, we suggest thoroughly evaluating the external lighting scheme and its implications onto the natural environment. Proposed high buildings (8 floors) are likely to become a source of light pollution if the lighting scheme (with special attention to the rooftop level facilities) is designed without attention to the respective guidelines (e.g. Guidelines on the reduction of light pollution in the Maltese Islands). Illumination of the construction site should be kept to minimum levels necessary for safety reasons and no lights should be faced seawards. It is important to carry out all the demolition/construction works only during daylight hours. The limitation to lighting on site should also apply to the construction phase of the project, as it is often the case that large spotlights are left on continuously at construction sights, and from our experience in past years these are often the cause of seabird groundings.

We strongly recommend conducting an ecological survey to determine the species which make use of the site and its immediate surroundings and which therefore might be affected by the construction of the resort. Given the Jerma Hotel has been left in an abandoned state for a very long time, there is a good possibility that a number of fauna have settled in the premises. As suggested in the previous ERA's screening report, several species of bats may roost in the abandoned building, while other fauna such as reptiles may have settled within the premises and would gain from respective relocations.

Jerma point and particularly the low-lying rocks and the shallow reef that extends seawards has historically attracted various wader birds to the area for feeding and resting, as a result of which it has also historically earned the toponym of 'Zaqq it-Tajr'. With the hotel in ruins over the past decade, the site has kept or re-established its potential to attract birds, with even hunters making use of this area. From BirdLife Malta

observations carried out in this area, a total of at least 80 bird species have been observed, a number of which are of conservation concern, such as European Nightjar, Blue Rock Thrush, Kentish Plover, Squacco Heron, etc (the full list of species observed can be found in the appendix below). Accordingly, we insist that the proposed plans are also evaluated in terms of their impact on the viability of the reef for avifauna, with due considerations being made to keep the site pristine and intact for its ecological and educational potential.

A noise and vibration study should evaluate the impacts on sensitive receptors during the demolition/construction phase and also take into account that the planned works are expected to last approximately 3 years. At the same time, given the nature of the proposed project, we would also suggest assessing impacts from the increased noise levels during operation (movement of vehicles, loud music from entertainment establishments, etc), since the scheme is located in the residential area.

The risks of adverse impacts (such as increased turbidity due to dust and other pollutants release and leakage, consequent impacts on the protected habitats and species) on the marine environment should be studied, especially in the context of a marine Natura 2000 area (MT0000108) located in less than half a kilometre distance offshore.

The estimated AADT is 3,533 vehicles, however this number is not final since it excludes the level -2 commercial space. For a tranquil locality such as Marsascala this increase in the amount of cars is significant, for that reason it is important to compile a Traffic Impact Statement and carefully evaluate the consequences and risks of the increased traffic and work out a sustainable way of managing the issue vis a vis the road infrastructure in the area.

Almost 60,000 m^3 of waste is going to be generated on site during the demolition and construction phase. A Waste Management Plan should be drafted and evaluated accordingly to make sure as little waste ends up landfilled as possible, no discards happen and the most appropriate routes are chosen to transport the waste. Waste management during operation should be given special attention as well, with an idea to incorporate biosecurity measures to avoid the increase of pest rodent species presence on site.

The site has also over the years become an ad hoc cat colony, with its respective impacts to the area. The relocation of such cats on site should be sensibly carried out such that the development of the site itself does not result in such felines being

abandoned or left feral elsewhere. Rather, provisions should be made for these to be introduced at appropriate sanctuaries or adopted accordingly.

Impact of demolition and construction activities on the ambient air quality should be evaluated, including higher PM concentrations. Dense traffic generated due to increased use of the area is likely to contribute to the overall level of air pollution (including NOx) which should also be studied.

Given the scale and mass of the project impacts on the landscape and visual amenity are expected to be high. The landscaping plan should be assessed separately. The aim should be to keep interventions to a necessary minimum; the selection of plant species should reflect naturally occurring flora in the Maltese Islands, and replanting of the affected native plants should be favoured on site.

Appendix 1. Bird species observed by BirdLife Malta in the given area starting from 2016 onwards

species recorded resting/feeding in or around abandoned hotel grounds
Common Quail
European Nightjar
Northern House Martin
Barn Swallow
Collared Sand Martin
Common Chiffchaff
Sardinian Warbler
Subalpine Warbler
Spotted Flycatcher
European Robin
Black Redstart
Blue Rock-thrush
Common Stonechat
Northern Wheatear
Isabelline Wheatear
Black-eared Wheatear
Spanish Sparrow
Meadow Pipit
White Wagtail
Grey Wagtail

species recorded resting/feeding on shoreline in front of the abandoned hotel
Squacco Heron
Grey Heron
Great White Egret
Little Egret
Great Cormorant
Black-winged Stilt
Grey Plover
Common Ringed Plover
Kentish Plover
Whimbrel

Ruddy Turnstone
Dunlin
Little Stint
Common Sandpiper
Spotted Redshank
Common Greenshank
Wood Sandpiper
Common Kingfisher

species recorded feeding on sea close to shore
European Storm-petrel
Scopoli's Shearwater
Yelkouan Shearwater
Slender-billed Gull
Black-headed Gull
Mediterranean Gull
Audouin's Gull
Lesser Black-backed Gull
Yellow-legged Gull
Caspian Gull
Caspian Tern
Black Tern
Sandwich Tern
Great Skua
Northern Gannet

species migrating out at sea or onto land from sea
Common Shelduck
Garganey
Northern Pintail
Common Quail
European Turtle-dove
Alpine Swift
Pallid Swift
Common Swift
Eurasian Spoonbill
Glossy Ibis
Black-crowned Night-heron

Cattle Egret (wild)
Purple Heron
Ruff
Pied Avocet
Short-eared Owl
European Honey-buzzard
Western Marsh-harrier
Montagu’s Harrier
Black Kite
Common Hoopoe
Lesser Kestrel
Common Kestrel
Peregrine Falcon
Eurasian Skylark
Tree Pipit
Red-throated Pipit
Western Yellow Wagtail
European Goldfinch