



BirdLife Malta comments on the Environmental Impact Assessment for the Construction of St. Albert College in Ħal Ghaxaq

26th November 2024

In response to the public consultation process for the Environmental Impact Assessment (EIA) for the construction of St. Albert College in Ħal Ghaxaq, BirdLife Malta would like to present the below concerns and comments.

Loss of Agricultural Land

Our major concern with this development is the unjustified loss of pristine agricultural land. Although the second version of the EIA proposes a reduced land take and a scaled-down development, **the revised scheme still requires a staggering 26,495 m² of land.** The EIA itself considers the impact of this development on agricultural land to be of major significance, particularly given the large area and the potential productivity of the land to be lost. Additionally, the proposed development will require the uprooting of 51 protected trees, including 17 carob trees, which adds further negative environmental implications.

Adding to the concerns, the EIA creates a conflicting argument as it identifies the site with a current low agricultural value, whilst later in Chapter 6 of the report it states that the development will result in the loss of "good quality agricultural land." As the EIA itself mentions, **this agricultural land on site could potentially be more productive with improved irrigation.**

Lack of transparency on the site selection process

In 2000, the former Planning Authority/Malta Environment and Planning Authority (MEPA) conducted a site selection exercise, identifying the Ghaxaq site as the preferred location for relocating St. Albert the Great College from a list of 12 potential sites.

The above site selection exercises still remain a mystery and the EIA fails once again to 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.

We still find that **the site selection exercise is a non-transparent exercise, and surely not satisfying the requirements of the EIA as set by the terms of reference**. Once again, 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 24 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.**

Policy Conflicts and Land Protection

The South Local Plan Policy, while designating the area as a potential site for educational facilities (SMGH 06), also emphasizes that "areas of high agricultural value are to be retained." The policy map titled "Għaxaq Environmental Constraints" further labels the area as "Awaiting Classification of Agricultural Value" under policy SMAG 01, which seeks to "protect agricultural land from all types of inappropriate development." Additionally, policy SMGH 06 specifies that "an assessment of the agricultural potential and quality of this area needs to be carried out, proposing measures to minimize the potential impact of the development on agricultural land." Therefore, despite the original MEPA site selection, **the 2006 South Local Plan does not definitively support this site for development, as it aims to protect agricultural land from inappropriate use.**

The latter has been confirmed by the Planning Authority (PA) itself, in a letter dated September 10, 2020, where it states that *"The area within which the site is located is designated as ODZ following Structure Plan Review through the enactment of the SPED. Thus, the justification in the local plan policy SMGH06 for allocating this site for development is no longer applicable"*. The PA further advised *"Considering that site is Outside the Development Zone (ODZ), the proposed development would conflict with Policy RO 3 of the Strategic Plan for Environment and Development (SPED), which only permits development in rural area either where it is justified to be located in a Rural*



Area in Government policies, plans or programs or is incompatible with urban uses and where other alternatives are not possible. Therefore, the proposal cannot be considered further unless the site is properly justified that it is suitable to accommodate one school through the sequential approach as stated in the SPED”¹.

Final Comments

Once again, **we suggest that the applicant and the Environment and Resources Authority (ERA) should seriously reconsider other options that would avoid using undeveloped land for this educational facility.** 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. 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. This approach would support future generations by preserving valuable green space and agricultural land, rather than compromising these resources.

¹ Environment Resources Authority. (2023). Annex I - Summary of the Environmental Impact Assessment (EIA). https://era.org.mt/wp-content/uploads/2020/06/PA-20_01123-Memo-to-ERA-Board-1.zip.