

PA/02906/16: Comments received by ERA during the EIA scoping stage (From 16th December 2015 to 18th January 2016)

A. Malta Resources Authority (Email dated 16th December 2015)

Comments

It is important to note that with the coming into force of Act XXV of 2015 (setting up of the Regulator for Energy and Water Services) the responsibility for Groundwater protection etc. was transferred to MEPA. The MRA does not have the remit and or responsibility for Groundwater protection.

B. The Regulator for Energy and Water Services (Email dated 21st December 2015)

Comments

The Regulator for Energy and Water Services does not in principle object to these types of developments.

Please note, that you are required to consult with the REWS when the development includes one of the following:

- Fuel/gas storage;
- Swimming pools;
- Installation of photovoltaic systems.

As these would require registration / authorisation / permit.

C. Transport Malta (Email dated 06th January 2016)

Comments

Transport Malta has no specific requirements for information that needs to be included in the terms of reference of the EPS.

D. Sliema Local Council (Email dated 8th January 2016)

Comments

Further to your request for our council to provide terms of reference to the project in caption we feel that the following concerns must be addressed and information requested in order to have a better understanding of what MEPA should seek in considering this planning application:

1. A detailed Heritage Appraisal of the Officers Mess with justifications for an further information about the following:
 - i. Practically all of the building is being proposed for demolition when the little photographic evidence provided shows that the internal fabric, albeit altered, is largely original and this of historic importance.
 - ii. The façade on Tigne' Street is being proposed for demolition.
 - iii. The existing rainwater storage reservoir in the atrium is being proposed for demolition.
 - iv. Any archaeology expected in the external spaces.
 - v. Will the remaining facades be dismantled and reconstructed?

2. A thorough traffic impact assessment in order to determine the possible effects of the project on the transportation, traffic and parking systems of the immediate and greater urban areas particularly the thoroughfares along and outside this quarter of Sliema.
3. A comprehensive environmental impact assessment which will include studies on:
 - i. The effect of the increased traffic generated on the fabric of the surrounding roads.
 - ii. The heightened pollution expected to be generated by vehicles used by the envisaged numerous hotel resident/ users, employees, suppliers and visitors.
 - iii. The condition of the surrounding sewerage systems and impact of the development on the greater public foul drainage and rainwater run-off systems of Sliema.
 - iv. The proposed storm-water storage systems to serve the new development (no water reservoirs were noted in the proposed plans). The extensive vertical surfaces of the tower block will provide copious rainwater catchment particularly those facing prevailing winds.
 - v. The long-term effects of prolonged shadows on the surrounding streets and buildings along the Tigne' and Qui-Si-Sana area, particularly effects on health, humidity and expected significant impact on users of PV panels.
4. A construction management plan providing details as to logistics, time-frames and very importantly overlaps with other nearby projects primarily the major ones such as the Town Square and Midi projects.
5. A social impact assessment which will analyse, monitor and eventually manage the intended and unintended social consequences, both positive and negative, of the project particularly any social changes invoked by those interventions such as anticipated night-time activity and seasonal fluctuations in demographics (peak tourist season, etc.).
6. Due assessment of Sliema Local Council's request for the scheduling of the Officers' Mess Barrack Block sent to your office last November, this having also been recommended by MEPA's in-house heritage experts. Please note that numerous other buildings in the immediate vicinity of lesser importance have been scheduled as Grade 2.
7. Review of permit conditions which MEPA gave to Fort Cambridge apartments development (PA4144/06), which stated that the military barracks would not be developed into a tall building (residents were reportedly also promised this by developers as part of their purchase contracts).

Last but definitely not least we would like to highlight once more the fact that MEPA's Fort Cambridge Development Brief has been practically ignored by the applicant. Our council has stood by this brief since it was published ten years ago and we would like to understand why such a document, which so meticulously outlined a vision for this site together with Fort Cambridge, is being overlooked. The brief has time and again underscored the architectural and historic importance of the Officers' Mess Barrack Block as well as its significance as a landmark building (Policies 2.3j, 2.15, 4.0j, 5.4, 5.11b, 6.17 and 6.27 to mention a few). This project not only ignores these policies but proposed the complete contrary of what they aspire to. In view of this the project should in all intents and purposes be considered by MEPA as a non-starter.

E. Environmental Health Directorate (Email dated 15th January 2016)

Comments

With reference to your e-mails dated 16 and 18 December 2015 regarding subject indicated in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development:

- Adverse air quality impacts especially from particulate matter and emissions from heavy vehicles, noise and vibration impacts during the demolition, excavation and construction

phase and during the operation phase and the effects of these impacts on sensitive receptors in the Area of Influence and on the general public.

- Waste management and disposal issues for all generated waste streams including generated wastes, cleaning chemicals, etc. from any on-site temporary toilet facilities for on-site workers.
- Ground water and surface water in terms of water quality including run-off management.
- Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel and lubricants.
- Traffic management and related problems including access arrangements and safety measures both for pedestrians and vehicular traffic.
- Air pollution control at any proposed basement parking.
- The possible effects on the well being of residents from reduced access to fresh air and sunlight from proposed high-rise building.
- Pest control management on site and the surroundings especially regarding rodents which could be an issue on the surrounding area during the demolition and excavation phase.
- The overall cumulative impacts of the development on receptors in the Area of Influence and the general public are also to be assessed.

Applicant is also requested to carry out specific discussions with the Environmental Health Directorate once the detailed plans regarding the proposed restaurant, any other catering/food outlets, water features, pools and other facilities (such as cooling systems, R.O. plants, solar energy, etc.) are prepared in view of specific regulations under the Food Safety Act and the Public Health Act.

The EPS should also include a detailed description of the measures envisaged to prevent, minimize and where possible offset any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and on the general public. This should include details of monitoring programmes that may be proposed. The EPS should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated..

F. BirdLife Malta (Email dated 18th January 2016)

Comments

BirdLife Malta Comments in Response to Proposed Fort Cambridge High Rise Hotel in Sliema Public Consultation (REF: TRK 162247 (EA00030/15))

BirdLife Malta recognises the development of the Fort Cambridge High Rise Hotel as an opportunity to make the best use of an already altered site whilst at the same time retaining the remaining historic facades in Sliema. This proposal, if carried out sustainably, would help to advance tourism as an environmentally conscious hotel. As such, BirdLife Malta recommends that considerations are made to lower coastal light pollution and therefore limit the detrimental impact to local seabird populations.

Light pollution

As identified in BirdLife Malta's 2014 light pollution report, over the last 36 years a total of 120 cases of stranded birds have been reported to BirdLife Malta. Within this period, there were 9 cases of stranded seabirds near the proposed project area, inclusive of the Yelkouan Shearwater, Scopoli's Shearwater and European Storm-petrel (Table 1), representing a 7.5% of total strandings. This figure could be significantly higher however as the number of stranded birds handed over directly to government authorities are not included in this data. The 2014 report therefore highlights the high sensitivity of seabird colonies to light pollution, not just at colony sites, but also kilometres away. As the project site is located close to the coastline, this could have a detrimental impact on seabird colonies if mitigation measures are not taken.

Stranding location	N _o of birds	Yelkouan Shearwater	Scopoli's Shearwater	European Storm-petrel	% of total
Valletta	2	1	1		1.67
Sliema	4	1	2	1	3.33
Pembroke	1	1			0.83
St Julian's	1	1			0.83
Swieqi	1		1		0.83

Table 1: Stranded bird cases reported to BirdLife Malta between 1978 and 2003 close to the proposed site. Source: BirdLife Malta.

Mitigation measures

BirdLife Malta notes the planned measures in the project description statement to save on light energy by using timed, controlled and low-energy lighting during the operational stage of the project. We encourage that these are extended to include special measures to reduce the impact of light pollution. As this development could have serious consequences on wildlife and the environment, we stress the importance of considering the following suggestions during both construction and operational phases of the project:

- Full cut-off lighting

For external lighting to be directed downwards only, below the horizontal plane (Figure 1), and to be used for all road lighting.



Image provided courtesy of Abacus Lighting

Figure 1: Example of good lighting shining downwards. Source: Abacus Lighting.

- Light restrictions

Placing restrictions on non-beneficial interior and exterior lights, taking this into particular consideration during peak fledgling periods.

- Using different types and wavelengths of light

Using high pressure sodium vapour lights, instead of mercury vapour lamps, as they emit less energy waste and glow. It has also been found that different wavelengths of lights have different levels of attracting birds. Blue and red lights are the least attractive and should therefore be considered with cranes and the construction of tall buildings (Rich and Longcore, 2006).

- Timed lighting

We recognise that this has been recommended for the operational stage and encourage the use of motion sensors or timers to also limit light use during the construction stage.

- Planning systems

We recommend limiting unnecessary and multiple lights, using minimum intensity lighting and introducing zoning such as with the Gozo Dark Skies initiative.

- Blanket prohibition on globe lights

To completely prohibit the use of these insufficient lights which cause light pollution even when they are partially-shielded.

- Light shields

In the case of non-use of the above recommendations, we suggest using shields to direct external light only where it is needed so that the pattern of illumination is below the horizontal plane of the light fixture. When used in areas around breeding colonies of shearwaters and petrels, shields can significantly reduce light pollution (Reed et al, 1985). However, light shields still produce unnecessarily high levels of light and therefore light pollution and we would recommend the preferred use of the previous options.

Conclusion

BirdLife Malta recognises the environmental impacts identified in the project statement description and supports the measures that will be put in place to mitigate against these. However, this list is not exhaustive and despite putting in place light energy-saving measures, the impact of light pollution during construction and operational stages has not been considered. This response has therefore set out the potential environmental impacts this development could have on wild birds and suggested suitable lighting alternatives.

In line with these, BirdLife Malta recommends that MEPA requests an external lighting scheme for both the construction and operational phases of the development, which scheme is assessed appropriately at the EPS stage of the development application. Any exterior lighting emanating from the development should be one that does not contribute, but rather minimises the current problem of coastal light pollution across the Maltese Islands.

ENDS

REFERENCES

Articles:

- Mula Laguna, J., Barbara, N. & Metzger, B., 2014. Light pollution impact on “tubenose” seabirds: an overview of areas of concern in the Maltese Islands.
- Le Corre, M., Ollivier, A., Ribes, S., & Louventin, P., 2002. Light-induced mortality of petrels: a 4-year study from Reunion Island (Indian Ocean). *Biological Conservation* 105; 93–102.
- Reed, J. R., Sincok, J. L., & Hailman, J. P., 1985. Light attraction in endangered procellariiform birds: Reduction by shielding upward radiation. *The Auk* 102: 377-383.
- Rich, C., & Longcore, T., 2006. Ecological consequences of artificial night lighting. Island Press, chapter 3, Bats and their insect prey at streetlights, pg 43-60, chapter 5, Influences of artificial lights on marine birds, pg 94-113.
- Sultana, J., Borg, J.J., Gauci, C. & Falzon, V., 2011. *The Breeding birds of Malta*. BirdLife Malta, Malta.
- Telfer, T. C., Sincok, J. L., Byrd, G. V., & Reed, J. R., 1987. Attraction of Hawaiian seabirds to lights: Conservation efforts and effects of moon phase. *Wildl. Soc. Bull.* 15: 406-413.

Websites:

- Gozo Dark Skies Initiative, online at: <http://www.maltastro.org/blog/?p=92>.