

Reference: EA/00021/21 (PA/05420/21) - Amended Application to PA 3134/19 - Construction of Corinthia Oasis – Works include amendments to previous permit - Construction of Hotel and 25 Residences. Site at, Corinthia Oasis (ex Hal Ferħ Complex), Triq il-Kappella Tal-Militar, Triq in Nahhalija, Mellieha.

Subject: Comments received by ERA during the 30-day public consultation period for Terms of Reference

Consultation period: 23 February 2022 – 25 March 2022

1) Government Entities

- Malta Resources Authority (dated 9 March 2022)

We would like to know if any part of any excavations are to be carried out within the saturated zone.

- Environmental Health Directorate (dated 14 March 2022)

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:

1. Air pollution impacts assessment
 - Emissions from heavy vehicles
 - Transports, storage, and handling of waste materials
 - Operational traffic
 - And their effects on the area of influence taking into consideration the fields used to grow crops.Necessary monitoring and mitigating measures must be clearly stated.
2. Noise and vibration impacts including construction activities, operational traffic and from other operational activities. Monitoring and mitigating measures must be clearly stated.
3. Traffic impact assessment and mitigation measures.
4. Light pollution impact and mitigation measures.
5. Waste Management Plan shall be implemented which should include the impacts from waste generated both during the construction (demolishing, excavated and construction material) and the operational phase. Hence the importance of a detailed Construction and Waste Management Plan, which should be enforced by the site project manager. Details of monitoring and feedback mechanisms must be clearly stated and adhered to.
6. Adverse impacts caused by heavy machinery used for this project. Necessary monitoring and mitigation measures are to be clearly stated and adhered to. These should include the method used for the refueling of said machinery.

7. 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. Necessary monitoring and mitigation measures are to be clearly stated and adhered to.
8. Monitoring and mitigation measures in case of rain, heavy winds and storms that may affect the works and might cause undesired spillage at sea and/ or land during the project should be clearly identified.
9. A hydrology assessment should be made available. Such assessment must include but not limit:
 - a. Details for the supply, distribution, and storage of potable water for the COL site.
 - b. Details of collection, storage, overflow and use of rainwater and grey water.
 - c. Ground water, surface water in terms of water quality including run-off management.
10. Details of proposed sanitary facilities for workers during construction phase.
11. Details of the proposed recreation and health facilities including the horse-riding facilities.
12. The overall cumulative impacts of the development and operation on the public.
13. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence.

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

Applicants are also requested to carry out specific discussions with the various Units within the Environmental Health Directorate once the detailed plans for the public areas, catering establishments, food outlets and other facilities (such as water distribution, water features, etc.) are prepared in view of specific regulations under the Food Safety Act, the Public Health Act, and the Control of Legionella.

- Superintendence of Cultural Heritage (dated 17 March 2022)

In response to your email of the 23rd of February 2022, please find recommended Terms of Reference for a Cultural Heritage Assessment i.c.w. the Environmental Impact Assessment (EIA).

1.0 Preamble

The current application (PA/05420/21), which covers amendments from previous permits at PA/04906/10 and PA/03134/19, still involves a large-scale development within the perimeter of a historical British military camp. Likewise, the site is situated within an area with a degree of scenic value and is in the vicinity of an Area of Ecological Importance (Ir-Ramla tal Mixquqa: GN 401/96) and

an Area of High Landscape Value (GN 400/96). Potential impacts may occur within the project's site footprint and may include direct impacts on the existing historical structures, as well as visual impacts on the landscape.

The Superintendence notes that this current application (PA/05420/21) reflects the validity of earlier permit PA/03134/19 (that was for the renewal of PA/04906/10). The Superintendence further notes that PA/04906/10 had been subject to EIA assessment GF/00117/10, which included a section on the cultural heritage assets, covering even the Lower Military Camp and its associated chapel.

The Superintendence notes that the current application (PA/05420/21) effectively proposes a new design, with new volumes and a new disposition of structures and interventions. This would not materially impact the development site beyond the impact approved in PA/04906/10 (renewed by PA/03134/19) but alter the impact of perceptions of the area and the surrounding landscape.

The above is expressed without prejudice to concerns and recommendations as had been expressed by the Superintendence in its response to PA/04906/10 and PA/03134/19 and without prejudice to its position and recommendations as may eventually be expressed in connection with PA/05420/21.

2.0 Scope and Definitions of the EIA

2.1 The study area will include:

- a) Immediate environs of the development site, with the site as viewed from approach roads and the immediate countryside.
- b) Viewshed of the development site as viewed from, with views of the site as visible from within the valley and from ridges flanking the valley.

2.2 The Environmental Impact assessment will:

- a) Identify impact of development on the visual value of the environs.
- b) Assess the impact on the visual values of the environs.
- c) Propose appropriate mitigation to lessen impact on the visual value of the environs.

3.0 Methodology

In identifying the visual and special values within the study area, and assessing the impacts of the proposed development, the EIA will undertake:

- A study of the visual amenity of the area, including photomontages from significant viewpoints.

4.0 Authorisation by the Superintendence of Cultural Heritage

As per Cultural Heritage Act 2019, any form of investigation or prospection required for the identification of cultural heritage (including excavation, field walking, topographic survey and remote sensing) may only be undertaken by the Superintendence of Cultural Heritage or with its written approval.

2) NGOs

- BirdLife Malta (dated 25 March 2022)

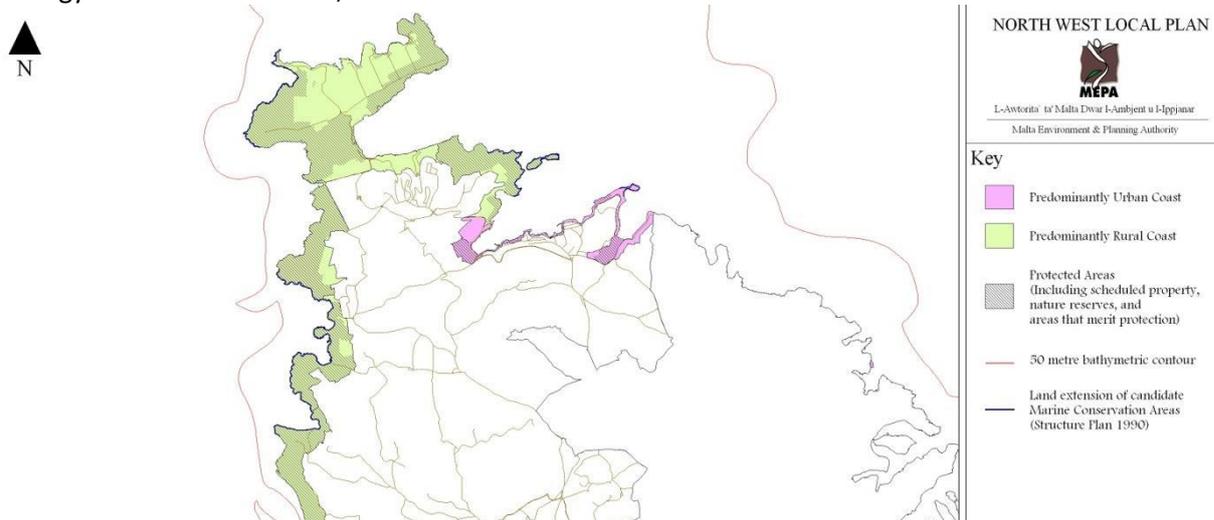
After reviewing the PDS available on ERA's website, BirdLife Malta would like to contribute to the consultation regarding the Terms of Reference for the EIA for the respective development with the following feedback.

The development envisages the construction of a 5-Star hotel and residential complex, upgrading of the road network in the Qasam ta' Ghajn Tuffieha area and the development of a surface car park on a site which has been transferred by the Government of Malta (GoM) to the Scouts Association Malta. The site area is 80,770m², out of which the footprint of the hotel constitutes 45,958m² and the proposed residential area another 30,645m². According to PDS, the built-up area stands for 15,580m².

In general, the project is of such a footprint and location which evokes major concerns. The site is adjacent to:

- SCI Rdimijiet ta' Malta: Ir-Ramla taç- Ćirkewwa sal-Ponta ta' Benghisa (MT0000024);
- An Area of Ecological Importance and Area of High Landscape Value;
- Il-Majjistral, Park ta' Natura u Storja.

Furthermore, it partly overlaps with the Area of Agricultural Value (NWAG 1), as defined by the North West Local Plan, the potential impact on which should be assessed accordingly. In line with the SPED, the area is of High Landscape Protection, also being a Rural Coast. SPED encourages continuation of traditional agricultural use of the rural coast (SPED, Coastal Objective 1). The Local Plan outlines the strategy for the coastal areas, as follows:



Source: North West Local Plan

❖ At the basement of a hotel, 120 car parking spaces are being proposed, this is in addition to more than 370 car and motorbike parking spaces proposed on the parking area currently under the Scout Association. The bungalows in the proposed residential area is also proposes to each have a parking space. Considering the relative large number of proposed car parking spaces at the location, a ***the traffic impact assessment during both construction and operation phases*** should be

undertaken, paying special attention to comparison between current and foreseen traffic flow during the peak season.

❖ The location has a number of buildings proposed for demolition within the site which have been unoccupied for some time and that may potentially host a significant number of avifauna species (especially, during the breeding season). Species such as Tree Sparrow, Barn Swallow, Blue Rock Thrush, Spotted Flycatcher, Collared Dove and Spanish Sparrow are known to frequent the site in the area with some breeding in the buildings on in the trees surrounding them. Therefore, it is important to conduct ***an ecological survey during the breeding season*** to assess the environmental impact due to potential loss of breeding bird species. Further attention should be given to any roosts of *Chiroptera* that may have occupied parts of the buildings over the years.

❖ The cliffs located in close proximity to the development site are known for their seabird colonies. Particularly, up to 400 pairs of Yelkouan Shearwater nest along the cliffs of Majjistral park, with other seabird species such as Scopoli's Shearwater and Mediterranean Storm-petrel also present. The marine area adjacent to the cliffs is designated as SCI and SPA (Žona fil-Baħar tal-Lbiċ) due to the importance of the area for rafting, breeding and foraging behaviour of seabirds. Therefore, due to the presence of seabird colonies, the project site is located in a highly sensitive area in terms of noise and light pollution. It is vital ***to assess the impact of another source of light on avifauna*** and work out the measures to reduce the glare, light spill and other types of light pollution to a minimum. An external lighting scheme should be assessed separately and should have the aim of reducing light pollution comparing to current levels.

❖ Same importance should be given to ***the assessment of noise*** with a special attention given to comparison between the current and foreseen noise levels during the demolition/construction and operation of the complex.

❖ Due to the potential of loggerhead turtles nesting at Golden Bay, we would also ask to include the ***assessment of vibrations*** on the beach area, both during the demolition/construction and the operational phase. Proper mitigation measures are to be proposed accordingly. An external lighting scheme should also be viewed in this regard, to not impact the potential for Golden Bay and Riviera Bay as potential nesting sites for these turtles.

❖ The demolition and the excavation works on the site will generate approximately 70,000 m³ of solid waste. The possibility to reuse such waste on site should be considered, especially when it comes to lime-stone blocks and other materials suitable for further use. For the waste not reused on the site the routes for its transportation with minimum environmental impact should be suggested. We also suggest that ***the waste management plan*** in force during the operation phase should be evaluated. It is important to pay special attention to sustainable organic waste management.

❖ Although the PDS states the average height of the complex is 2 storeys, there are buildings which accommodate higher elements (such as on the drawing of Elevation E3). ***We suggest evaluating whether such building height is appropriate within the surrounding rural and coastal context.***

❖ We would like to express our particular concern with regards to the proposed residential units zone, the fact that the villas and bungalows, being located in such an ecologically sensitive area, can be sold to individual owners creates a situation where the land use and the impact on the environment is difficult to monitor and control. There is a need to carefully analyse this issue. Alternatives sites, as well as alternative designs should be presented and evaluated thoroughly given the scale of the development and rural nature of the coast.

3) Public

No feedback received.