

Annex III – Feedback received by ERA during public consultations

Section 1 – 30-day consultation on scoping:

a) Government Entities

No:	From:	Comments:
1	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.
2	Environmental Health Directorate (dated 14 March 2022)	<p>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:</p> <ol style="list-style-type: none">1. Air pollution impacts assessment<ul style="list-style-type: none">• 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.

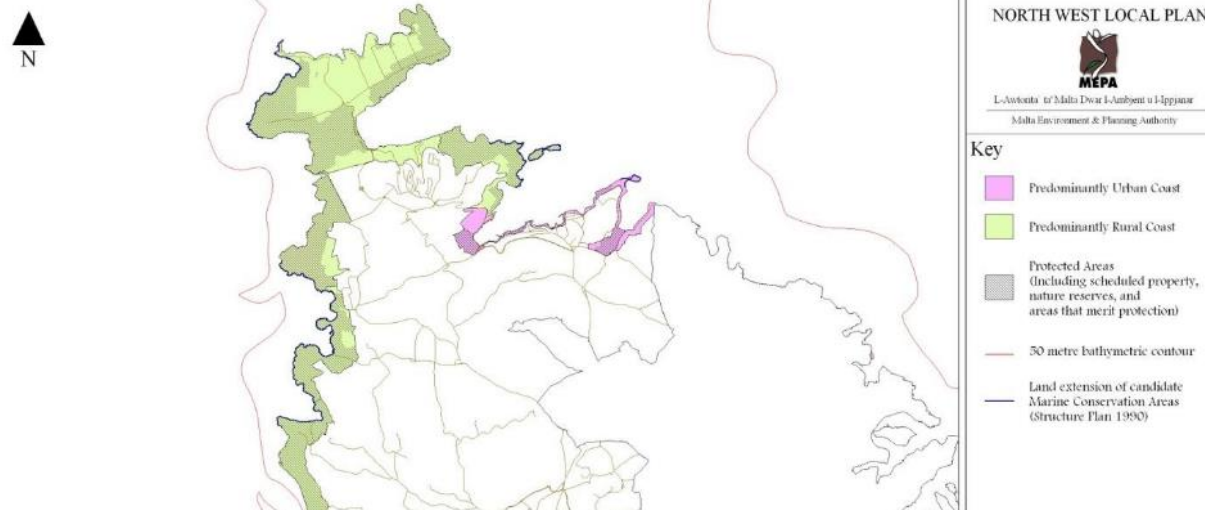
		<p>7. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel, and lubricants. Necessary monitoring and mitigation measures are to be clearly stated and adhered to.</p> <p>8. Monitoring and mitigation 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.</p> <p>9. A hydrology assessment should be made available. Such assessment must include but not limit:</p> <ol style="list-style-type: none"> Details for the supply, distribution, and storage of potable water for the COL site. Details of collection, storage, overflow and use of rainwater and grey water. Ground water, surface water in terms of water quality including run-off management. <p>10. Details of proposed sanitary facilities for workers during construction phase.</p> <p>11. Details of the proposed recreation and health facilities including the horse-riding facilities.</p> <p>12. The overall cumulative impacts of the development and operation on the public.</p> <p>13. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence.</p> <p>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.</p> <p>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.</p>
3	Superintendence of Cultural Heritage (dated 17 March 2022)	<p>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).</p> <p>1.0 Preamble</p> <p><i>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)</i></p>

	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>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.</p> <p>2.0 Scope and Definitions of the EIA</p> <p>2.1 The study area will include:</p> <ol style="list-style-type: none"> Immediate environs of the development site, with the site as viewed from approach roads and the immediate countryside. 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. <p>2.2 The Environmental Impact assessment will:</p> <ol style="list-style-type: none"> Identify impact of development on the visual value of the environs. Assess the impact on the visual values of the environs. Propose appropriate mitigation to lessen impact on the visual value of the environs. <p>3.0 Methodology</p> <p>In identifying the visual and special values within the study area, and assessing the impacts of the proposed development, the EIA will undertake:</p> <ul style="list-style-type: none"> A study of the visual amenity of the area, including photomontages from significant viewpoints. <p>4.0 Authorisation by the Superintendence of Cultural Heritage</p>
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		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.
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b) NGOs

No:	From:	Comments:
1	BirdLife Malta (dated 25 March 2022)	<p>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.</p> <p>The development envisages the construction of a 5-Star hotel and residential complex, upgrading of the road network in the Qasam ta' Ghajn Tuffieħa 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.</p> <p>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.</p> <p>In general, the project is of such a footprint and location which evokes major concerns. The site is adjacent to:</p> <ul style="list-style-type: none"> - SCI Rđumijiet ta' Malta: Ir-Ramla tač- Ċirkewwa sal-Ponta ta' Bengħisa (MT0000024); - An Area of Ecological Importance and Area of High Landscape Value; - Il-Majjistral, Park ta' Natura u Storja. <p>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:</p>



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 (Żona 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**

		<p><i>the impact of another source of light on avifauna</i> 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.</p> <p>❖ Same importance should be given to <i>the assessment of noise</i> with a special attention given to comparison between the current and foreseen noise levels during the demolition/construction and operation of the complex.</p> <p>❖ Due to the potential of loggerhead turtles nesting at Golden Bay, we would also ask to include the <i>assessment of vibrations</i> 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.</p> <p>❖ 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 <i>the waste management plan</i> in force during the operation phase should be evaluated. It is important to pay special attention to sustainable organic waste management.</p> <p>❖ 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). <i>We suggest evaluating whether such building height is appropriate within the surrounding rural and coastal context.</i></p> <p>❖ 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.</p>
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c) **Public**

No feedback received.

Section 2 – 30-day consultation on review and following the public hearing:

a) Government Entities

No	From:	Comments:	EIA Coordinator response
1	Superintendence of Cultural Heritage (feedback received on 25 November 2024)	<p>Ref. Cultural Heritage Act 2002 (as amended) (CAP 445)</p> <p>Environmental Impact Assessment (EA/00021/21) i.c.w. PA/05420/21 Amended Application to PA/03134/19 – Construction of Corinthia Oasis – Works include amendments to previous permit – Construction of Hotel and 25 Residences.</p> <p><u>Review of results identified in the Environment Impact Assessment</u></p> <p>The Superintendence has assessed the data gathered and compiled in the technical reports entitled EIA Report Coordinator, EIA Consultants Report, Appropriate Assessments and Project Info (Final Versions).</p> <p><u>Proposal</u></p> <p>As outlined in the description of works, the proposal at PA/05420/21 is for amendments to permit PA/03134/19 (renewal of PA/04906/10), for the construction of the Corinthia Oasis project. The amended development is for the construction of a hotel and 25 residences over a site footprint that measures some 83,500 square metres, with the implementation of a degree of landscaping throughout the footprint.</p> <p>Submitted master plans indicate that the development will be separated into three distinct zones, namely the Hotel, Residential (villa), and Chapel (sports facilities) areas. The Car Park (referred to as 'Scouts' Car Park) area is already approved by PA/03134/19 and no further amendments are currently being proposed for this area in PA/05420/21.</p> <p>The project description statement refers that a gross floor area of 25,000 square metres will be allocated to buildings. Whilst this is relatively in line with the 24,724 square metres allocated in the previously approved development, a significant change is noted in the design, disposition, and volumes of the proposed development.</p> <p>The previously approved development consisted of attached blocks arranged in a serpentine manner (with the implementation of a degree of landscaping), which screened centrally located circular villas. The current development consists of distinct zones (with landscaping implemented throughout the total footprint), including a residential zone with blocks of units, and a hotel zone, with a central hotel structure and surrounding units. Both developments consist of the use of the 'Scouts' Car Park Area and include the restoration of the Ghajn Tuffieha Camp Military Chapel, approved to be used as a multi-use area in PA/03134/19</p> <p>(renewal of PA/04906/10) and proposed to be utilised as a sports facility in PA/05420/21.</p>	<p>Demolition works carried out on site permitted by PA/03134/19 – works being monitored by the Superintendence of Cultural Heritage.</p> <p>The chapel has already been fully restored.</p> <p>The landscaping consultants submit the following:</p> <p>There have been preservation of existing maquis species or compensated if being removed such as:</p> <ul style="list-style-type: none"> – <i>Prunus dulcis</i> – <i>Olea europaea</i> – <i>Pinus halepensis</i> – <i>Ficus carica</i> <p>On top of the preservation and compensation, we also use below species as some of the main species across the site:</p> <ul style="list-style-type: none"> – <i>Laurus nobilis</i> – <i>Ceratonia siliqua</i> – <i>Pistacia lentiscus</i> – <i>Punica granatum</i> – <i>Tetraclinis articulata</i> <p>There have been species proposed to be used for Hotel Private Garden, Aromatic Garden near the spa, Botanical Garden, Fruit Garden near the kids play, Floral Garden near the</p>

	<p><u>Cultural Heritage Context</u></p> <p>The site footprint is situated within a significant landscape that has a considerable degree of scenic value, also being within the immediate vicinity of an Area of Ecological Importance (Ir-Ramla tal-Mixquqa; GN 400/96; Level 3 Protection) and an Area of High Landscape Value for the coastal cliffs (GN 400/96).</p> <p>The site and its surroundings are of historical significance, forming part of the Ghajn Tuffieha military camp that dates to the turn of the 20th Century. In reference to the structures that formed part of the Lower Camp, the Superintendence notes that the demolition and removal of these structures, other than the preservation and restoration of the Military Chapel, was approved by permit PA/04906/10 (and renewed in PA/03134/19).</p> <p>This office notes that the structures of the Lower Camp were considered to be compromised, in poor condition and not of such significant value to warrant preservation (as agreed by the HPU and the Superintendence). The above is in comparison to the Upper Camp and Lower Camp Military Chapel, considered to be of greater architectural value, in relatively good condition, and meriting conservation and restoration. The Superintendence notes that the above referred structures in the Lower Camp have already been demolished and restoration works are ongoing on the Military Chapel as per permit PA/03134/19.</p> <p>Considering the historical use of the site and noting the presence of recorded archaeological features in the surrounding landscape, including Classical Period tombs and Megalithic remains to the North-West, and the presence of a known Bronze Age Settlement to the South-East, the Superintendence notes that the site footprint has a considerable degree of archaeological potential. Notwithstanding the above, this office notes that the site in question is already subject to archaeological monitoring as per permit PA/03134/19.</p> <p>In addition to the above, several cultural heritage assets are located in the surrounding area, including:</p> <ul style="list-style-type: none"> – The Ghajn Tuffieha Entrenchments (GN 729/95; scheduled at Grade 1) – 62 metres from the proposed 'Scouts' Car Park (north section of the entrenchment near existing hotel) and 85 metres from the proposed Hotel Zone (southern section of the entrenchment near decommissioned sewage plant). – It-Torri ta' Ghajn Tuffieha (GN 729/95; scheduled Grade 1 – 322 metres from the proposed Residential Zone. – British Colonial Pillbox (overlooking Ghajn Tuffieha Bay) – 163 metres from the proposed Residential Zone. <p><u>Report on Cultural Heritage</u></p> <p>The Superintendence notes the study's report on cultural heritage, included in the EIA Report, the Non-technical Summary, and the Report on the Cultural Heritage Impact Assessment for the Amended Application to PA 3134/19.</p>	<p>chef to table area as well as Private Villas, to name a few below which is not the extensive list:</p> <ul style="list-style-type: none"> – <i>Rosmarinus officinalis</i> – <i>Fumana spp</i> – <i>Phlomis fruticosa</i> – <i>Thymbra capitata</i> <p>Trees already have been planted as part of the Scouts carpark.</p> <p>The trees making up the proposed soft landscaping scheme have already been planted in a nursery area set up within the site. This commitment was made in the QP <i>Construction Management Plan</i> enclosed with the first draft of the EIA Report.</p>
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		<p><u><i>Report on the Cultural Heritage Impact Assessment for the Amended Application to PA 3134/19</i></u></p> <p>The Cultural Heritage Impact Assessment indicates that the study was conducted to focus on the visual impacts resulting from the development being proposed in PA/05420/21 (also noting that the structures of the Lower Camp, except for the Chapel, were already been deemed suitable for demolition), in view that the new proposal would not result in material impact beyond what was already approved by PA/04906/10 (renewed by PA/03134/19), but rather alter perceptions of the area and the surrounding landscape.</p> <p>The study refers to the previous EIA at GF/00117/10, which had already covered a cultural heritage baseline of the areas of Hal Ferh, including the structures of the Lower Camp, Upper Camp, as well as other known cultural heritage assets in the surroundings, including the scheduled Ghajn Tuffieha Entrenchments, the Torri ta' Ghajn Tuffieha, and the British Colonial Pillbox (referred above).</p> <p>Identification, assessment, and suggested mitigation measures are based on several photomontages provided by the developer, namely:</p> <ul style="list-style-type: none"> – South-facing view of the site footprint. – North-west facing view of the site footprint, including the Military Chapel/theatre and Upper Camp. – West facing viewpoint, facing the Pwales Valley. <p>The study correctly specifies that the site is situated within an area of high landscape value, noting that architectural and design interventions need to demonstrate a high degree of respect for the character of the surrounding landscape.</p> <p>With reference to the above, the study considers the proposed structures to be designed in a manner that would be compatible within a rural landscape. Whilst noting that landscaping would reduce the overall visual impact of the proposed development, further mitigation could be achieved via the use of globigerina limestone in lieu of white-washing or painting of walls. The use of “fake rustication” (adopted by the British Period barracks in the Upper Camp), could also be made use of to further accentuate the design of the proposed structures.</p> <p>Furthermore, the study refers to the ‘Scouts’ Parking site, which is considered to have an adverse effect on the rural landscape. Whilst noting the difficulty of implementing landscaping in this area, the study recommends that soft landscaping be implemented to mitigate the visual impact of the parking area. Additional recommendations include the installation of solar car ports to provide an additional asset to the development.</p> <p>It is within the study’s consideration that the surrounding landscape of Ghajn Tuffieha has been altered by the construction of the Upper and Lower Camp, as well as the Radisson Blue Hotel. Considering that the structures of the Lower Camp (barring the Military Chapel) have been demolished, it is thought that the proposed development, with a detailed landscaping plan, would</p>	
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		<p>result in a positive impact on the landscape. Nevertheless, the above referred measures are thereby recommended to further mitigate the resulting visual impact.</p> <p>Despite the aforementioned, the context of the Military Chapel is deemed no longer extant due to the demolition of the Lower Camp. Thus, it is considered highly essential for the proposed development to respect the Military Chapel, thus respecting its uniqueness and cultural heritage value.</p> <p>The study's proposed mitigation measures are referred below:</p> <ul style="list-style-type: none"> – Integration of maquis and garigue vegetation. – Use of “fake rustication” and globigerina limestone to further imitate the landscape. – Landscaping be implemented within the ‘Scouts’ Car Park, which can be further enhanced with the installation of car ports. – Close monitoring of the landscaping process, which is to be maintained in the long-term. – Close monitoring of the restoration process of the Military Chapel. <p><u>EIA Report and Non-technical Summary (Report on Cultural Heritage)</u></p> <p>The EIA's report on cultural heritage refers to the structures located within the Ghajn Tuffieha Lower Camp, which are assigned as Site A (Lower Camp structures) and Site B (Lower Camp Military Chapel). The study correctly makes note of the approval for the demolition of all structures located within the Lower Camp at Site A (having already been carried out as per permit PA/03134/19). The above approval was based on positions taken by the Superintendence and HPU unit, where it was considered that the structures within the Lower Camp were not in a condition or of significant enough value to warrant preservation, unlike those existing within the Upper Camp. The above contrasts with the Military Chapel at Site B, considered of value and approved for conservation and restoration.</p> <p>In addition, the study refers to the previous EIA (GF/00117/10) carried out for the site, which at the time suggested the retention of several of the Lower Camp structures (those dating to the British Period) which was not agreed upon by the Superintendence and MEPA, thus earmarking them for demolition. Furthermore, the report refers to the mitigation measures proposed by the Cultural Heritage Impact Assessment, noting that “there are changes that can be implemented to the current proposal to further mitigate the impact and extend the positive impact.”</p> <p><u>Additional Comments/Recommendations</u></p> <p>With reference to the above, the Superintendence notes that the Report on Cultural Heritage covers the current situation regarding heritage assets within the site footprint and the surrounding area, noting that the demolition, retention, and restoration of existing structures is already subject to permit PA/03134/19. In this effect, the above referred cultural heritage assets should not be subject to additional material impact from the development proposed in PA/05420/21, nor should additional material impact be caused to surrounding cultural heritage features.</p>	
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	<p>Whilst the Superintendence generally agrees with the above and takes cognisance of the proposed mitigation measures indicated to reduce visual impact, this office notes that no additional reference is made to archaeological monitoring. Noting the considerable archaeological sensitivity of the area, the Superintendence recommends that any additional ground disturbance that may be carried out be archaeologically monitored (as already imposed as per PA/03134/19).</p> <p><u>Report on Visual Impact</u></p> <p>The Superintendence has reviewed the study's landscape and visual impact assessment, based on a total of 14 photomontages taken from long, medium, and short distance viewpoints. In addition, this office acknowledges that many of the viewpoints in this study were also included in the study for the previous EIA (GF/00117/10). Visual impact is being considered on the level of significance that the proposed development's visual effect will have from a relative viewpoint.</p> <p>Moreover, the impact's significance is also assessed based on the timeline of the proposed landscaping plan. Proposed by the Corinthia Oasis Company Limited (COCL), a landscaping nursery is proposed to be planted during the period of construction works, which will be grown for once operations commence, ultimately contributing to the screening of the proposed development. Conversely, this landscaping plan is illustrated and emphasised in the submitted photomontages, which are divided between the proposed development with basic landscaping, landscaping in Year 1, and landscaping in Year 10.</p> <p>The following viewpoints have been selected for the above referred photomontages:</p> <table> <tr> <th>Photomontage</th><th>Location</th><th>Distance from Site</th></tr> <tr> <td>Viewpoint 1</td><td>Upper Camp</td><td>Short Distance</td></tr> <tr> <td>Viewpoint 2</td><td>Il-Fawwara</td><td>Short Distance</td></tr> <tr> <td>Viewpoint 3</td><td>Triq tal-Wilga</td><td>Short Distance</td></tr> <tr> <td>Viewpoint 4</td><td>South of il-Manikata West</td><td>Medium Distance</td></tr> <tr> <td>Viewpoint 5</td><td>South of il-Manikata</td><td>Medium Distance</td></tr> <tr> <td>Viewpoint 6</td><td>Ta' Gannaru</td><td>Long Distance</td></tr> <tr> <td>Viewpoint 7</td><td>Il-Mizieb Woodland</td><td>Long Distance</td></tr> <tr> <td>Viewpoint 8</td><td>Hamlet West of il-Ballut</td><td>Long Distance</td></tr> <tr> <td>Viewpoint 9</td><td>Triq Ghajn Tuffieha, to the West of Viewpoint 8</td><td>Long Distance</td></tr> <tr> <td>Viewpoint 10</td><td>Triq tal-Wilga, to the NorthEast of Viewpoint 02</td><td>Short Distance</td></tr> <tr> <td>Viewpoint 11</td><td>Il-Wied ta' Ghajn Tuffieha</td><td>Medium Distance</td></tr> </table>	Photomontage	Location	Distance from Site	Viewpoint 1	Upper Camp	Short Distance	Viewpoint 2	Il-Fawwara	Short Distance	Viewpoint 3	Triq tal-Wilga	Short Distance	Viewpoint 4	South of il-Manikata West	Medium Distance	Viewpoint 5	South of il-Manikata	Medium Distance	Viewpoint 6	Ta' Gannaru	Long Distance	Viewpoint 7	Il-Mizieb Woodland	Long Distance	Viewpoint 8	Hamlet West of il-Ballut	Long Distance	Viewpoint 9	Triq Ghajn Tuffieha, to the West of Viewpoint 8	Long Distance	Viewpoint 10	Triq tal-Wilga, to the NorthEast of Viewpoint 02	Short Distance	Viewpoint 11	Il-Wied ta' Ghajn Tuffieha	Medium Distance	
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		Viewpoint 12	Il-Wied ta' Ghajn Tuffieha	Medium Distance	
		Viewpoint 13	Riviera Martinique Car Park	Short Distance	
		Viewpoint 14	Il-Moxa ta' Ghajn Tuffieha, to the West of il-Manikata	Medium Distance	
		<p><u>Viewpoint 1: Upper Camp</u></p> <p>Taken from the Ghajn Tuffieha Upper Camp, Viewpoint 1 (Upper Camp) is situated at a point of relative lower elevation and is in close proximity to the site footprint. Whilst the proposed development is noted as having a low profile, the study indicates that the substantial footprint would result in an impact of high significance. Nevertheless, whilst it is noted that the impact is evident from all photomontages, the importance of the landscaping design is considered of high significance, as it contributes to a substantial transformation of the development, its overall footprint, and its impact on the surrounding area.</p> <p>In the previous EIA, the study had concluded that the approved development at PA/03134/19 appeared substantial, due to the low elevation of the viewpoint and the proximity of the development. To mitigate this impact, the study had recommended higher density planting, particularly along the perimeter of the site.</p> <p>In reference to the above, the Superintendence is in agreement with the study's consideration that the proposed development at PA/05420/21 would have a high significance of impact. Notwithstanding the above, it may also be considered that the development approved by PA/03134/19 would result in structures that are more impactful both in massing and volumes from this viewpoint. Additionally, it is evident that the landscaping plan (particularly by Year 10) as proposed would eventually add a degree of screening that would aid in mitigating the above referred impact.</p> <p><u>Viewpoint 2: Il-Fawwara</u></p> <p>Viewpoint 2 (Il-Fawwara) is conditioned by the Radisson Blue Hotel, which takes centre stage in the referred photomontage. Taken at the intersection of Triq Ghajn Tuffieha and Triq tal-Wilga, the proposed development is only partially visible from this viewpoint. However, the study considered the visual impact as highly significant with only basic landscaping. Conversely, with mature landscaping (incrementally between Year 1 and 10), this level of impact would be reduced to moderate.</p> <p>Whilst a nearby viewpoint was considered in the previous EIA, the photomontage in question focused on views of the Ghajn Tuffieha Upper Camp, further towards the East of the Radisson Blue Hotel. The impact of this viewpoint was considered as moderate, as the approved development was not considered as significantly different between existing structures. Recommendations were given for additional landscaping along the perimeter to mitigate impact.</p>			

		<p>Taking cognisance of the variations in focus between the above referred viewpoints, the Superintendence notes that the approved development and the proposed development are only comparable to a certain degree. Nevertheless, impact resulting from the proposed development on views of the Upper Camp is not considered to be significantly increased from that approved. Notwithstanding the above, this office has reservations on the study's consideration that the mature landscaping plan reduces the impact from high significance to moderate. Whilst noting a reasonable degree of screening by Year 10, much of the proposed development will still evidently be visible and notable from this viewpoint.</p> <p><u>Viewpoint 3: Triq tal-Wilga</u></p> <p>Situated along Triq tal-Wilga, Viewpoint 3 is also dominated by the Radisson Blue Hotel, set towards the far right of the viewpoint. Currently considered flat, somewhat arid, and unremarkable, the proposed structures would result in a visual impact that is considered highly significant. The above is being considered both in terms of basic landscaping and with mature landscaping (Year 1 and 10), noting that the inappropriate urban development in a rural context would be particularly evident with the basic landscaping scheme, and that even the dense landscaping of later stages of operation would be of significant contrast between the existing degree of aridity. Nevertheless, mature landscaping is considered to have the potential to soften the visual impact of the Radisson Blue Hotel.</p> <p>With reference to the above, it should be noted that current views at this location are also characterised by the lack of structures pertaining to the Ghajn Tuffieha Lower Camp, which have been demolished as approved. The previous EIA study had considered impact of the approved development from this viewpoint to be of high significance, creating the appearance of a single long wall. Additional landscaping was recommended to enhance visual amenity at this location.</p> <p>The Superintendence agrees with the study's view that the impact at the location is significant in all scenarios. Notwithstanding the above and taking into consideration the removal of the Lower Camp structures, this office notes that the approved development, especially in terms of its singular massing, would be more impactful than the proposed development from this viewpoint.</p> <p><u>Viewpoint 4: South of il-Manikata West</u></p> <p>Taken from the villa area of Manikata, Viewpoint 4 is characterised by significant and scenic views of the rural and cultural landscape of Ghajn Tuffieha, albeit being somewhat marred by the accumulated rubble from the demolished structures of the Lower Camp. The study considers the proposed development's impact to views at this location to be of high significance in all scenarios, including with basic landscaping and more mature landscaping in Year 1 and 10.</p> <p>The above was similarly noted during the previous EIA's study, which considered that the approved development would result in an impact of high significance from this viewpoint, thus recommending a higher density of trees both along the perimeter and internal areas. Whilst noting that the previously existing Ghajn Tuffieha Lower Camp structures constituted significantly less</p>	
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		<p>impact that than either the proposed or the approved development, the Superintendence notes that both developments result in similar degrees of impact from this viewpoint (with particular reference to the basic landscaping scheme for the proposed development). Additionally, the existing rubble currently deposited within the site footprint results in its own impact on the surrounding landscape. Notwithstanding the above, this office is in agreement with the study's considerations regarding this viewpoint.</p> <p><u><i>Viewpoint 5: South of Il-Manikata</i></u></p> <p>Situated at a lower elevation than the previous viewpoint, Viewpoint 5 is situated at the Eastern side of the thoroughfare leading towards Manikata (from South to North). Views at this location are also somewhat marred by accumulated rubble from the demolition of the Lower Camp structures. The study considers the impact at this location to be similar to that of Viewpoint 4, noting a high degree of significance from all scenarios.</p> <p>The above contrasts with the considerations of the previous EIA, which considered the impact to be of moderate significance, noting that views of the Ghajn Tuffieha Tower would not be impacted by the approved development, but rather the most significant change would be the replacement of existing greenery with new construction. Recommendations for mitigation included higher density landscaping as before.</p> <p>With reference to the above, the Superintendence agrees with the consideration that the impact of the proposed development has a high degree of significance from this viewpoint. Nevertheless, and whilst having some reservations to the previous study's considerations of the impact of the approved development (considered moderate), this office notes that the visual intensity of construction is seemingly more evident in the proposed development when comparing it with that approved (this will be somewhat mitigated through mature landscaping at later stages of operation).</p> <p><u><i>Viewpoint 6: Ta' Gannaru</i></u></p> <p>Captured at a considerable distance from the site footprint, Viewpoint 6 is located in the Pwales Valley floor. Seen as a visually unappealing view (due to poor maintenance of the area), the study considers the visual impact from this viewpoint to be of low to moderate significance. Nevertheless, and similarly as above, visual impacts are considered in terms of inappropriate urban development in a rural context with the basic landscaping scheme and denser landscaping in Year 1 and 10.</p> <p>The Superintendence notes that no comparable long-distance viewpoint was included in the previous EIA study. Whilst noting that the Radisson Blue Hotel takes the main focus in this viewpoint, this office would consider the impact to be of moderate significance with basic landscaping, noting the lack of mature landscaping being visually evident (compared to the existing scenario), which can be considered of lower significance as landscaping matures during the later stages of operation (Year 1 and 10).</p>	
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		<p><u><i>Viewpoint 7: Il-Mizieb Woodland</i></u></p> <p>Situated on the Bajda Ridge at the edge of the Mizieb Woodland, Viewpoint 7 is also dominated by the Radisson Blue Hotel. The study considers the above referred view to be only moderately interesting, with minor views of the Ghajn Tuffieha Tower and the Riviera Martinique being visible, but also being marred by the presence of greenhouses and poorly maintained rubble walls. Visual impact from the view is considered to be of moderate to high significance.</p> <p>Similarly to Viewpoint 6, the Superintendence notes that no comparable long-distance viewpoint was included in the previous EIA study. This office takes cognisance that the Radisson Blue Hotel is the predominant focus in this viewpoint and would agree that the impact of the proposed development is particularly significant with basic landscaping, noting that the existing greenspace will be completely absorbed. The above will only be mitigated adequately to a degree by Year 10, following adequate maturing of the proposed landscaping.</p> <p><u><i>Viewpoint 8: Hamlet west of il-Ballut</i></u></p> <p>Located near an area known as il-Ballut, Viewpoint 8 is captured along a thoroughfare which connects the area of Ghajn Tuffieha with San Pawl il-Bahar. Dominated by existing greenhouses and the Radisson Blue Hotel, the study considers this long-distance view to be less appealing due to the predominance of man-made structures, which mar the overall vista. Visual impact is considered to be of low to moderate significance from this viewpoint.</p> <p>In terms of the similar viewpoint submitted for the previous EIA, the study considered the approved development to be of moderate impact from this viewpoint, essentially removing the green band of trees with new development, but not significantly altering the visual scenario.</p> <p>With reference to the above, the Superintendence considers the visual impact of the proposed development to be of higher significance than that already approved, in particular when considering the development with basic landscaping. Whilst taking cognisance that the existing view is already impacted to a degree by man-made development, without adequate landscaping, the proposed development can be seen as a visual extension to the Radisson Blue Hotel, which will only be mitigated with mature landscaping by Year 10.</p> <p><u><i>Viewpoint 9: Triq Ghajn Tuffieha to the west of Viewpoint 8</i></u></p> <p>Whilst being located along the same thoroughfare as Viewpoint 8, Viewpoint 9 is considered to be of higher visual value as the foreground is relatively free of man-made structures. From this viewpoint, the study considers the impact of the proposed development to be of moderate to high significance.</p> <p>With regards to the previous EIA, the study had considered the approved development to be of moderate impact from this viewpoint, noting that the development would be clearly visible but would not dominate the visual scene, which would remain predominantly rural in nature.</p>	
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		<p>considered more compatible with the surrounding rural context, when considering and contrasting the design of the approved development.</p> <p><u><i>Viewpoint 13: Riviera Martinique Car Park</i></u></p> <p>Located at the car park near the Riviera Martinique building, Viewpoint 13 captures the dense development that exists in Manikata and provides a slight glimmer of Mellieha in the distance. Additionally, the view's foreground is dominated by trees and greenery. Whilst noting the above, the study takes cognisance of the considerable development that exists in Manikata and further notes that its poor architectural design has led to an unattractive profile from this viewpoint. Nevertheless, the study considers the impact of the proposed development to be of high significance from this viewpoint.</p> <p>A comparable viewpoint was included in the previous EIA (albeit closer toward the site footprint), which also highlighted views of Manikata. The study had considered the impact of the approved development from this viewpoint to be of high significance, noting that whilst the development would not obscure views of Manikata, it would result in a massive single coherent unit, rather than the segmented individual blocks that were present within the footprint. As in other viewpoints, the study at the time had recommended the implementation of landscaping to mitigate the impact.</p> <p>Whilst noting that background views are dominated by existing development in Manikata, the Superintendence notes that the contrast between the existing greenery in the foreground and its removal via the construction of the proposed development would result in a significant impact on the perception of views from this vantage point. Therefore, the Superintendence is in agreement with the study's considerations regarding this viewpoint, noting that a degree of adequate mitigation will only be achieved by later stage mature landscaping by Year 10.</p> <p><u><i>Viewpoint 14: Il-Moxa ta' Ghajn Tuffieha to the West of Il-Manikata</i></u></p> <p>Taken towards the West of Manikata, Viewpoint 14 provides views of the undeveloped areas of Il-Moxa ta' Ghajn Tuffieha and Ix-Xaghra l-Hamra. Taking cognisance that the view in question allows for a vista of a captivating landscaping, the study considers the impact of the proposed development from this viewpoint to be of high significance.</p> <p>The Superintendence notes that no comparable viewpoint was included in the previous EIA study. Whilst noting that the accumulated rubble from the demolished Lower Camp structures results in its own impact on the surrounding landscape, this office is in agreement with the study, noting that the proposed development would significantly impact this viewpoint.</p> <p>Taking cognisance that views from this vista highlight a predominantly undeveloped landscape, the Superintendence notes that the proposed development would create built volumes that will significantly alter perceptions. Additionally, this office notes that whilst mature landscaping may provide a degree of mitigation by Year 10, the resultant impact from the proposed development will, nonetheless, remain significant.</p>	
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		<p><u>Conclusion and Recommendations</u></p> <p>The Superintendence takes cognisance of the study held in relation to EIA (GF/00117/10), noting that the material considerations and values of existing cultural heritage assets are already subject to existing permits and conditions. Considering the above, this office notes that much of the current EIA study (EA/00021/21) relates to differing impacts on visual receptors in comparison to the approved development. Notwithstanding the above, the Superintendence refers that any approved conditions, including restoration and archaeological monitoring, are to remain valid and imposed in the connected Planning Application at PA/05420/21.</p> <p>With regards to the review of visual impact, and whilst having some reservations to the study's considerations (particularly in relation to Viewpoints 2 and 8), the Superintendence is generally in agreement with the study's assessment. Despite the anticipated impacts of the proposed development, this office acknowledges the commitment demonstrated by the approved development. It is also noted that the impacts of both developments can be considered comparable, and in some cases, the proposed development has lesser impacts.</p> <p>Notwithstanding the above, the Superintendence recommends that the study's mitigation measures be integrated into the proposed development, including the integration of maquis and garigue vegetation for landscaping measures (which is to be maintained and closely monitored in the long-term), the incorporation of rustication and use of franka stone to be more compatible with the surrounding rural landscape, the implementation of landscaping for the Scouts' Car Park, and the close monitoring of the restoration process of the Military Chapel (as already referred above).</p>	
2	Department for Health Regulation (feedback received on 28 November 2024)	<p>With reference to the environmental impact assessment dated November 2024 regarding subject indicated in caption, please be informed that the Environmental Health Directorate (EHD) has the following comments/recommendations:</p> <p><u>Construction Phase</u></p> <p>Should this proposal be accepted, the applicant is to adopt best practices to ensure compliance with Environmental Management Construction Site Regulations during the construction phase. Moreover, applicant is to implement all proposed mitigation measures so as to reduce any nuisances and mitigate adverse air, noise and vibration (from dust dispersal and emissions from vehicles and machinery) impacts on sensitive receptors in the Area of Influence and on the general public. It is important to draw up and implement a Construction Management Plan to ensure adherence to proper site management practices which address ground-water, surface water and sea water pollution, to mitigate other adverse construction impacts (including construction traffic impacts) and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.</p>	Comments noted and have been passed on to the architects and building services engineers for their consideration and to ensure compliance with the cited regulations.

		<p>The necessary mitigation measures are to be taken to prevent contamination of the water course passing through the scheme that leads to the bathing water. Furthermore, the use of water sprays to maintain dampness of the construction material can cause surface runoff which may end in the water course or in the bathing area within the scheme and thus this has to be avoided. The creation of water aerosols from such activity should also be minimized as these cause a public health risk to employees and public in area of influence. Hence it is recommended that said water is treated with an appropriate biocide prior use.</p> <p>Safe and proper handling of raw materials on site should also be ensured to reduce the risk of spillage that might lead to contamination of the area of influence. Good practices and adequate preventive measures are to be taken for any accidental spillage of construction material and/or excavation waste, hazardous fluids, fuel and lubricants which are also to be well managed and adequately stored.</p> <p><u>Waste Management</u></p> <p>Waste management strategy should be adopted and implemented during the construction phases so that all generated waste streams will be contained, separated, and disposed of safely through the appropriate facilities and according to the necessary permits/licences. With regards to removal and disposal of any hazardous/ and non-hazardous waste, adherence to regulatory codes and procedures and due diligence is important in view of health and safety and any adverse impacts on nearby sensitive receptors.</p> <p>Generated waste, cleaning chemicals, etc. from any temporary sanitary facilities for on-site workers should be also properly disposed of.</p> <p>Any waste generated during the operation phase is to be disposed according to the local laws and regulations.</p> <p><u>Air, Noise & Vibration Pollution</u></p> <p>All necessary mitigation measures are to be implemented during the construction phase to reduce the level of air pollution. Moreover, all mitigation measures to control dust must also be carried out with to prevent that any runoff ends outside the scheme and into the bathing area. Identified measures to ensure that surface run-off, water used for dust control, water used for wheel washing and general cleaning are to be adopted and maintained during construction and operational phase. It is also pertinent that during the operation of the scheme all proposed mitigation measures are strictly implemented to mitigate all environmental risks than can cause underground, surface, and airborne pollution.</p> <p>All the necessary mitigation measures during the construction and operation phase of the project are to be implemented to prevent and/or reduce the level of noise and vibration pollution in the surrounding area.</p> <p><u>Traffic Pollution</u></p>	
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		<p>The grey water system is to be registered with the Superintended of Public Health. At no time the treated water is to be used as water for human consumption. However, this may be used for irrigation or flushing apparatus if treated with a biocide. The EIA states that the treated grey water will be used for washing. The applicant is to ensure that the use of this water for washing is not used in areas used for food and beverage, pool areas and patrooms rooms including bathrooms. At no time treated grey water must overflow into the street and or ground outside the scheme which this may end into the bathing water. It is highly recommended that the reservoir to collect rainwater is not used to store treated grey water.</p> <p>The necessary mitigation measures are to be taken to prevent water runoff from irrigation of landscape. The use of pesticides and fertilizers is to be contained to prevent its residual reaches the water course within the scheme.</p> <p><u>Legionella</u></p> <p>A risk assessment manual and other requirements indicated in LN 5 of 2006 Control of Legionella, amended by LN 262 of 2006 must be carried out prior operational phase starts. It is being recommended that the applicant should discuss the plan for distribution of water systems of the proposed project and pool with the EHD at the initial stage of the project. The requirements of LN 297 of 2023 Water Intended for Human Consumption should also be adhered to.</p> <p><u>Light</u></p> <p>The necessary mitigation measures are to be adopted to avoid undesirable light pollution that may have an effect on the neighbouring environment.</p> <p><u>Conclusion</u></p> <p>All proposed mitigation measures regarding adverse impacts arising from this development during the construction and operation phases are to be implemented by the applicant to mitigate any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and to the general public. The possible health effects of any residual impacts that cannot be mitigated and the overall cumulative impacts should also be taken into consideration.</p> <p>Consultation with the Health Certification Consultation Unit within the EHD regarding the operation of any food and beverage commercial facilities, is to be carried out prior opening of any food business.</p> <p>Moreover, any other unpredicted impacts and nuisances which may arise from this development and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken.</p> <p>Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.</p>	
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3	Energy and Water Agency (feedback received on 28 November 2024)	<p>The following are comments for The Energy and Water Agency divided by considerations which relate to specifically and solely to energy and water management.</p> <p><u>Energy:</u></p> <ul style="list-style-type: none"> – To minimize the project's heating/cooling electricity consumption, it is being suggested that the project developers consider the installation of renewable technologies such as ground source heat pumps, provided that these obtain the necessary clearance from the respective authorities. – The applicants are suggested to integrate PV systems into the available roof space and the covering of the car park to reduce their dependency on the electricity grid. <p><u>Water:</u></p> <ul style="list-style-type: none"> – The use of treated greywater on the site is a positive initiative that EWA agrees upon. – It is recommended to use efficient water fixtures whenever possible, especially in bathrooms, kitchenettes, and other relevant areas. – Landscaping should respect the Mediterranean character of the Maltese islands and be compatible with the surrounding environment by utilising native species of trees, shrubs and plants which do not require excess amounts of irrigation water. – It is noted that reservoirs will be replenished with other Non-Conventional Water Sources (NCWS) when they are empty. However, it is essential to ensure that these reservoirs are not full as rainy weather approaches, to maximize the capture and utilization of rainwater. – For the villa Zone it is mentioned that "a manual/automated diverter valves to allow for excess rainwater to be diverted directly to the proposed storm water pipework". If possible, this should be diverted to the hotels reservoir to capture any excess. – An estimated water consumption for all the areas (Hotel complex, villa areas, irrigations areas and the tourism zone) should be included. <p>This should include the 39-signature water and garden suites and any features that these will have.</p>	<p>The project building services engineers and architects have informed the EIA coordinator that:</p> <ul style="list-style-type: none"> – The project makes use of highly efficient mechanical and electrical systems, which comprise heat pumps for hot water production, heat recovery systems, highly efficient chiller systems, grey water treatment plants, harvesting and re-utilisation of rainwater. – Any consideration of photovoltaic panels at roof level would need to be assessed from a visual impact point of view. – Following a geotechnical investigation carried out (boreholes), the possibility of using ground source heat pumps was deemed to be unfeasible due to the lack of access to sea water from within the site perimeter. – efficient water fixtures will be applied wherever possible.

b) NGOs

No:	From:	Comments:	EIA Coordinator response
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1	<p>Light Pollution Awareness Group (The Astronomical Society of Malta) (feedback received on 6 November 2024)</p>	<p>The development is not to be a source of light pollution. To this effect:</p> <ol style="list-style-type: none"> 1. Lighting should be strictly limited to within the developed part of the site. 2. The development hereby being permitted should not be considered as a justification for the lighting of the access roads, tracks and paths leading to the site or other lighting beyond the site boundary. 3. The lighting has to be from any peripheral landscaping inward, so as to be screened as much as possible by the landscaping itself. Moreover, the Planning Authority should request that as part of the works, should the present permit application be granted, ALL existing exterior lighting on site be changed to conform with the above conditions. 4. To mitigate light pollution, any external lighting should have a correlated colour temperature (CCT) lower than 2300 Kelvin, or G-index (Green Index) ≥ 1.5, and employ lighting fixtures that are downward facing and full cut-off. 5. Lighting fixtures should illuminate only where needed to prevent light trespass. 6. Any illumination that is employed should take into account the reflectivity of the surrounding surface to mitigate skyglow as well as glare. 7. Any lighting that is not strictly necessary or in a less traveled area should be installed with a motion sensor to power off or dimmed when not required. <p>Adequate checks before and after the works should take place.</p>	<p>The architects confirm that the design of exteriors lighting system will be designed with reference to the guidelines issued by public agencies (ERA & PA, 2020) and NGOs (Crymble, 2020; LPAG, 2000), and the standards/principles (bsi.knowledge, 2024; CIBSE, 2016; CIE, 2017; ILP, 2021) on which the guidelines are based.</p> <p>The references to the documents mentioned:</p> <p>bsi.knowledge. (2024, November 30). BS EN 12464-2:2024: Light and lighting. Lighting of work places Outdoor workplaces. Retrieved February 15, 2025, from British Standards Institute (BSI): https://knowledge.bsigroup.com/products/light-and-lighting-lighting-of-work-places-outdoor-work-places-1?version=standard</p> <p>CIBSE. (2016, May). Lighting Guide 6: The exterior environment. Retrieved February 14, 2025, from Chartered Institution of Building Services Engineers (CIBSE): https://www.cibse.org/knowledge-research/knowledge-portal/lighting-guide-06-the-exterior-environment-2016</p> <p>CIE. (2017). CIE 150:2017: Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition. doi:10.25039/TR.150.2017</p> <p>Crymble, J. (2020, July). Guidelines for Ecologically Responsible Lighting. Retrieved February 15, 2025, from BirdLife Malta: https://birdlifemalta.org/arcipelagugarnija/ & https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf</p> <p>ERA & PA. (23 ta' June 2020). Guidelines for the Reduction of Light Pollution in the Maltese Islands Public Consultation Document. Irkupra 15 ta' February 2025, minn Environment & Resources Authority (ERA): https://era.org.mt/topic/public-consultation-guidelines-for-the-reduction-of-light-pollution-in-the-maltese-islands/</p> <p>ILP. (2021, May 26). ILP Guidance Note 1: the reduction of obtrusive light has been updated. Retrieved February 15, 2025, from Institution of Lighting Professionals: https://theilp.org.uk/ilp-guidance-note-1-the-reduction-of-obtrusive-light-has-been-updated/</p> <p>LPAG. (2000, September). Guidelines for the reduction of <i>light pollution</i>. Retrieved February 15, 2025, from L-Għaqda Maltija tal-Astronomija: https://www.maltastro.org/committee/guidelines-for-the-reduction-of-light-pollution/</p>
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2	BirdLife Malta (feedback received on 3 December 2024)	<p>BirdLife Malta submits the following comments and recommendations in response to the public consultation for the Environmental Impact Assessment (EIA) concerning Corinthia Oasis (formerly Hal Ferh Complex).</p> <p>The Hal Ferh complex has been abandoned and undisturbed for a considerable period, leading to its habitation by vertebrate fauna, including several breeding bird species. Both the Appropriate Assessment (AA) of Vertebrate Fauna and the EIA list the breeding birds present onsite, but discrepancies exist between the two. For instance, the AA mentions the Common Quail (<i>Coturnix coturnix</i>), Eurasian Chaffinch (<i>Fringilla coelebs</i>) and Cetti's Warbler (<i>Cettia cetti</i>) as present, while the EIA omits these species. These lists require revision to ensure consistency with the AA findings.</p> <p>While the AA provides a thorough assessment of the vertebrate fauna on-site, the EIA fails to propose adequate mitigation and compensatory measures for potential habitat and species loss. For instance, the financial support of restoration and/or management of nearby protected areas including the Majjistral Park, may be incorporated within the EIA as a compensatory measure. Although the EIA identifies that dismantling and demolition will result in the destruction of flora, it neglects to address how fauna might also be impacted during this phase. The only proposed measure involves erecting impermeable hoarding to restrict species movement, with no plans to mitigate habitat destruction or bird displacement.</p> <p>To address this oversight, we recommend that dismantling and demolition, scheduled to last two months as per the Construction Management Plan, be carried out outside the birds' breeding season (March to June). This will prevent the destruction of active nests within the site itself. Furthermore, incorporating nesting spaces within the new construction design could compensate for displaced breeding birds, alongside setting up bird boxes suitable for species observed on-site. We would like to take this opportunity to inform the developers of our availability to provide guidance and recommendations on integrating these features into the new premises of the Corinthia Oasis project.</p> <p>The EIA includes mitigation measures for the operational phase, such as using specific fertilisers and pesticides, landscaping with approved plant species, and installing downward-facing, low-intensity lighting. However, it lacks provisions for monitoring the operational phase. Given the site's sensitive location, adjacent to protected areas of national significance, a robust monitoring plan is essential to ensure the implementation of</p>	<p>The landscape designers have informed this EIA coordinator that:</p> <p>The landscaping scheme is intended to allow movement of present taxa and to provide refuge areas. The proposed rubble walls will create natural corridors to promote movement. The scheme also introduces a plant and tree palette, which is native to the Island and with the density of planting proposed, this will create a more consistent tree canopy cover than is currently on the site, for a more suitable environment for birds.</p> <p>Furthermore, architectural features may be provided for nesting.</p> <p>In respect to the comments on light pollution, reference is made to the response in in Row Error! Reference source not found. (Error! Bookmark not defined.).</p> <p>This EIA coordinator is informed by IHI Malta Hotel Limited (The Oasis developer's mother company) that:</p> <p>"An operational rules and procedures manual shall be prepared for both standard day-to-day operations (in the hotel, the landscaped area and the villas) and emergencies (mainly fire). The management of the private villas shall be addressed in this manual, including procedures for noise and lighting"</p> <p>Please refer to the Operations section 5.1.2 (on pages to 249) of the second draft of the EIA Report, submitted with this document).</p>
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		<p>¹ Syposz, M., Padget, O., Willis, J., Van Doren, B. M., Gillies, N., Fayet, A. L., ... & Guilford, T. (2021). Avoidance of different durations, colours and intensities of artificial light by adult seabirds. Scientific Reports, 11(1), 18941.</p> <p>² Rodríguez, A., Rodríguez, B., & Negro, J. J. (2015). GPS tracking for mapping seabird mortality induced by light pollution. Scientific reports, 5(1), 10670.</p> <p>³ Austad, M., Oppel, S., Cymbble, J., Greetham, H. R., Sahin, D., Lago, P., ...& Quillfeldt, P. (2023). The effects of temporally distinct light pollution from ships on nocturnal colony attendance in a threatened seabird. Journal of Ornithology, 164(3), 527-536.</p> <p>⁴ Stanley, T. R., White, J. M., Teel, S., & Nicholas, M. (2020). Brightness of the night sky affects loggerhead (<i>Caretta caretta</i>) sea turtle hatchling misorientation but not nest site selection. Frontiers in Marine Science, 7, 221.</p>	

		<p>This concern is heightened by the cumulative impacts of ongoing touristic activities present within the Aol. Therefore, it is essential to ensure that the premises do not become an additional source of disruptive outdoor activities during the breeding season of species within the Aol.</p> <p>In addition to the above, whilst we acknowledge that a comprehensive lighting scheme is being presented together with the EIA, we would like to add that any outdoor lighting should not only be downwards facing but also of a full cut-off type, to ensure that there is no light spillage in the surrounding environment. Only full cut-off fixture guarantees that light is directed only to where it is needed. They are the only fixture type to have a ULOR of 0%⁵. With regards to increased illuminance by cars within the premises, even though this is recognised as an impact by the EIA, it does not account how this will be mitigated for.</p> <p>Lastly, we are concerned about monitoring and controlling impacts from the private villas. The Hal Ferh development brief states the land is government-owned, yet it remains unclear how this status will change upon the villas' privatisation. The EIA does not account for potential impacts arising from these properties, making it challenging to mitigate them. Impacts from the 'villa neighborhood' must fall within the EIA's scope, as the site could be exposed to unknown future developments and impacts once privatised. If the development shall result in privatised land parcels which will be open to future speculation, changes in land use or changes in the actual use of the individual villas, then the impact from such developments cannot be truly determined. The development permit should seal the possibilities of diversified use of these sites, should this project go ahead.</p>	
		<p>⁵ https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf</p>	

c) **General public**

No:	From:	Comments:	EIA Coordinator response
1	[Member of the public] (email dated 21 November 2024)	<p>The development is not to be a source of light pollution. To this effect:</p> <ol style="list-style-type: none"> 1. Lighting should be strictly limited to within the developed part of the site. 2. The development hereby being permitted should not justify the lighting of access roads, tracks, and paths leading to the site or other lighting beyond the site boundary. 3. Lighting must be directed inward from any peripheral landscaping and screened by the landscaping itself. As part of the works, should the present permit application be granted, all existing exterior lighting on site must be modified to align with these conditions. 4. To mitigate light pollution, any external lighting should have a correlated color temperature (CCT) lower than 2300 Kelvin or a Green Index (G-index) ≥ 1.5 and must employ downward-facing, full cut-off fixtures. 5. Lighting fixtures should only illuminate necessary areas to prevent light trespass. 6. Illumination should account for the reflectivity of surrounding surfaces to minimize skyglow and glare. 7. Any lighting that is not essential or located in low-traffic areas should be equipped with motion sensors to dim or power off when not required. 8. Adequate checks must take place before and after works to ensure compliance with these measures. <p>Additionally, we would like to highlight the following concerns specific to this project:</p> <ul style="list-style-type: none"> – The hotel already poses significant problems for the nearby environment, as newborn turtles have been observed heading inland due to disorienting artificial lighting. It is essential that the management takes proactive measures to significantly reduce lighting during turtle hatching periods to avoid exacerbating this issue. – While the project may claim that it will be "hidden by trees in 10 years," such mitigation is delayed and insufficient. We suggest that the trees required for screening be planted now. If the screening is deemed critical, the development permit could be deferred until 2034, once the trees are mature enough to provide the promised coverage. <p>We urge the Planning Authority to enforce these conditions rigorously and consider the ecological impact of this project on the surrounding area.</p>	<p>The above response to comment 1 of Table 2 (NGOs) was reiterated in relation to lighting.</p> <p>Corinthia Oasis have informed the [EIA Coordinator] that the trees making up the proposed soft landscaping scheme have already been planted in a nursery area in the Site. This commitment was made in the Construction Management Plan enclosed with the first draft of the EIA Report.</p>

2	[Member of the public] (feedback received via the Online Public Consultations Platform on 25 November 2024)	<p><u>Feedback on PA/05420/21 – Corinthia Oasis Development Proposal</u></p> <p>I am writing to provide feedback on the Corinthia Oasis development proposal (PA/05420/21) as part of the ongoing consultation. While I acknowledge the potential economic benefits of this project, I believe there is significant scope for Corinthia Group to set an example of environmental leadership. Below are my recommendations for consideration to ensure this project becomes a benchmark for sustainable development, while protecting and enhancing Malta's natural heritage.</p> <ol style="list-style-type: none"> 1. Establish a Biodiversity Net Gain (BNG) Plan; The developer should commit to a Biodiversity Net Gain approach by creating habitats on-site that improve biodiversity compared to the pre-development condition. Measures could include: Incorporating green roofs and living walls into the design, providing urban habitats and mitigating the urban heat island effect. 2. Energy Innovation and Carbon Neutrality; To make this development a model for future projects in Malta, the Corinthia Group should pursue a zero-carbon goal by: Installing renewable energy systems, such as solar panels and geothermal heating, to meet on-site energy demands. Implementing a smart grid for optimized energy use. Ensuring energy-efficient building designs using sustainable materials. 3. Community Co-Benefits; The development should provide benefits to the local community, such as: Creating public access to observation decks in restored areas. Funding local conservation programs, such as dune restoration or native plant nurseries. 4. Establishment of a Review Mechanism by ERA, Last but NOT least. To ensure transparency and accountability, I strongly propose that ERA establishes a mechanism to evaluate its own effectiveness in monitoring and enforcing the project's environmental commitments. This mechanism could involve external experts or NGOs who conduct regular reviews of the project's compliance with environmental obligations and share findings with the public. <p>By implementing these recommendations, the Corinthia Oasis project can go beyond mitigating harm and instead become a model for sustainable development, regenerative tourism, and environmental stewardship in Malta. I believe these measures are both attainable and aligned with Corinthia Group's resources and reputation.</p>	<p>Whilst there are currently no legal requirements for the preparation of BNGs in Malta, it needs to be noted that the landscaping proposal proposes a broad suite of trees and shrubs, both deciduous and evergreen, as well as nectaring sources, it is envisaged that the area will attract a host of wildlife species ranging from micro mammals, avifauna (mainly but not exclusively passerines), reptiles, and a large variety of invertebrates, including pollinators such as butterflies and moths, bees and hoverflies, in significant number. The area is thus envisaged to act as a refuge and an attraction to migrant species across different seasons.</p> <p>The project building services engineers and architects have informed the EIA coordinator that:</p> <ul style="list-style-type: none"> – The project makes use of highly efficient mechanical and electrical systems, which comprise heat pumps for hot water production, heat recovery systems, highly efficient chiller systems, grey water treatment plants, harvesting and re-utilisation of rainwater. – Any consideration of photovoltaic panels at roof level would need to be assessed from a visual impact point of view.
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