

The Executive Chairperson  
Planning Authority  
St Francis Revelin  
Floriana

Date: 12/01/2022  
ERA Ref: EA/00029/21

Dear Sir, Madam,

**Planning Ref.:** PA/05952/21

**Description of proposal:** The redevelopment of the seaside lidos belonging to the Sunny Coast Hotel, Luzzu, and the Seashells Resort at Suncrest Hotel - retaining their primary use as ancillary functions to the hotels; integrating a parking facility at basement level; and redistributing street level commercial outlets to be integrated within a large scale network of pedestrianised urban spaces: including the creation of a widened promenade walk, the provision of piazzas and pedestrian routes, and the upgrading of the open space in front of the Sunny Coast Hotel. To include for the demolition of existing structures and the excavation of the site. The redeveloped site includes: an underground delivery area and a parking facility (Class 3B and 3C) at basement level; ancillary functions to the hotels at lido level which include indoor and outdoor pools and pool deck (Class 3C), food and beverage outlets (Class 4D), a conference centre (Class 3C), a spa and leisure centre (Class 3C) and related ancillary back of house facilities (Class 3B and 3C); and pedestrianised, accessible urban spaces in the form of piazzas, gardens and walkways integrated with a conference centre (Class 3C), commercial outlets (Class 4B and 4C), and food and beverage outlets (Class 4D) at street level.

**Location:** Sunny Coast Lido & Garden, Luzzu Lido and Suncrest Lido, Triq il-Luzzu c/w, Triq il-Qawra, Qawra, San Pawl il-Bahar.

**Planning Ref.:** PA/06179/21

**Description of proposal:** The redevelopment of the seaside lido belonging to the Seashells Resort at Suncrest Hotel, retaining its primary use as ancillary functions to the hotel at lido level, while integrating a parking facility at basement level as well as a number of commercial offers set within pedestrianised urban spaces at street level. To include for the demolition of existing structures and the excavation of the site. The proposed development includes: an underground parking facility (Class 3B) at basement level; Ancillary functions to the hotel at lido

level which include indoor and outdoor pools and pool deck (Class 3C), food and beverage outlets (Class 4D), and related ancillary back of house facilities (Class 3B and 3C); pedestrianised accessible urban spaces in the form of a piazza and walkways integrated with commercial outlets (Class 4B), and food and beverage outlets (Class 4D) at street level.

**Location:** Suncrest Hotel Lido, Triq il-Qawra, Qawra, San Pawl il-Bahar.

Reference is made to ERA's Assessment and Recommendations, including Annex I – Schedule III Screening, as per EApps documents PA/05952/21 – 91a-b and PA/06179/21 – 76a-b, and the further submissions at documents PA/05952/21 – 97a-d and PA/06179/21 – 81a-d. ERA has the following feedback in terms of:

*Visual appearance of the sea-facing site boundary:*

ERA has noted the proposed treatment of the seawall, as shown in the submitted photomontages and visuals, and has no further comments in this regard.

*Possible re-use of excavated material on site:*

ERA has noted the conclusions of the report by Dr. Mifsud (dated 23 December 2021), i.e. that the desk study and observations from borehole cores have not identified feasible options for direct after-use of the material on site, in view of the properties of the material present on site, and has therefore no further comments in this regard.

*Lighting:*

ERA agrees with the proposed lighting concept. In addition, kindly also indicate the intensities of the proposed lighting. Proposed pathways and piazza should not be illuminated with more than 5 lux and 7.5 lux (average), respectively.

*Rocky shore along the site:*

ERA has noted the clarifications provided and has no further comments in this regard.

*Alternative modes of transport:*

ERA notes and appreciates the inclusion of EV car sharing bays with charging facilities and cycle racks at street level, as included in the plan at document 88b. It is kindly requested to also include facilities at basement level (underground car park) (e.g. EV bays/charging facilities, motorcycle bays, cycle racks, etc.), where possible.



With respect to the required expert opinion, as outlined in Section 2 of the afore-mentioned ERA Assessment and Recommendations (in terms of the Flora, Fauna and Natural Habitats Protection Regulations, S.L. 549.44), ERA notes that such information will be provided in due course.

In this regard, ERA's position will be finalised following the outcome of the said expert opinion.

Yours faithfully,

Yves De Blick  
Environment Protection Officer  
f/Director Environment & Resources

