

Attn: Ms Denise Micallef Xuereb
[PRIVATE]

Date: 08/04/2022
ERA Ref: EA/00029/21

Dear Madam,

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 ..., 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 – Conditions and Annex II – Works Method Statement TORs, at EApps docs PA/06179/21 – 90a-c (dated 20 January 2022) and the proposed Works Method Statement (WMS) and Environmental Monitoring Programme (EMP), as referred directly to ERA on 25 March 2022.

Following review of the proposed WMS and EMP, ERA had requested further clarifications from the project proponents in terms of waste and runoff management, to which the following clarifications were provided:

- No crushing of waste material will take place on site; and
- The pool of the adjacent Luzzu lido will be available as back-up for additional containment of any water runoff on site, in the event of extensive flooding during adverse weather conditions, to further prevent dust-laden runoff and/or material/debris reaching the rocky shore and the marine environment during the works.

Following the above clarifications, ERA has no further comments on the said WMS and EMP, and has no objection for works to commence, subject to the below conditions that are to be adhered to (these are to be read over and above the conditions already specified in EApps doc 90b):

- A silt curtain at sea is to be deployed in the event adverse impacts on the marine environment are observed during the works and environmental monitoring, to contain any turbid runoff from reaching further out into the sea. With respect to the silt curtain:
 - o It is recommended that no expanded polystyrene or any such material is used as a float, but an appropriate floating boom is used, which is sown with the geotextile material to keep it afloat at least 20 cm above water;
 - o The silt curtain used must be adequate to the nature of the works so as to ensure containment of any turbidity generated;

- No works are to be carried out should unfavourable weather conditions compromise the effectiveness of the silt curtain, even if such conditions are predicted days before, works then should not be held;
- One should ascertain that the effectiveness of the silt curtain will not be negatively affected by any of the vessels that may be using the adjacent areas and/or nearby quays; and
- As a minimum, the silt curtain should be left in place at least **3 days** after works are stopped for any turbidity to settle.
- Should any turbidity be noted beyond the curtained areas, ERA would need to be informed immediately and may request the installation of additional mitigation measures, and may also stop the works until said turbidity settles.
- Spill kits and spill equipment shall be made available throughout the entire duration of the works;
- All raw materials and wastes storage areas (to be used for temporary storage of waste only) are to be kept away from the sea as much as possible, to avoid these being carried away to sea during rough weather conditions;
- ERA is to be notified immediately on ced.coast@era.org.mt (with eia.malta@era.org.mt in copy), should any issues arise during the works and/or monitoring. Monitoring reports are to be forwarded to the same email contacts.

Yours faithfully,

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

cc.: Perit Peter Brincat, [PRIVATE]

Disclaimer

The above conclusions and recommendations are without prejudice to any required changes or updates should the development proposal be eventually modified or should the information/assumptions provided turn out to be incorrect. Any deviations of the proposal from this submission would need to be re-assessed and the merits of this screening would need to be re-opened.

