

Our Ref: ADI015
Your Ref: EA/00029/21

13th January 2022

Mr Yves De Blick
Environment & Resources Authority
Hexagon House
Marsa

Dear Mr De Blick,

Re: PA/05952/21 & PA/06179/21: Redevelopment of the seaside lidos belonging to the Sunny Coast Hotel, Luzzu, and the Seashells Resort at Suncrest Hotel, Qawra

Reference is made to the above application and ERA's Response dated 30th November 2011 following submission of the Project Description Statement for the said development. In particular, this letter addresses the following ERA comment:

2. Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44)

Screening (refer to Section 7 of Annex I) concluded that impacts on the marine protected sites are unlikely to be significant, however, the Authority is requesting an expert opinion to identify and flag any issues there may be from construction-phase works on the sensitive species within the nearby protected saltmarsh (Is-Salini), and to make recommendations on how these should be addressed.

In order to address the above comment Mr Adrian Mallia & Ms Rachel Xuereb from Adi Associates together with Applicant (Ms Denise Xuereb & Mr James Attard) met with Birdlife Malta representatives Mr Nicholas Barbara and Mr Mark Gauci to discuss the redevelopment of the lidos and potential impacts on the protected area of Is-Salini. The following are minutes of the meeting that have also been agreed with Birdlife Malta:

1. Waste management – the Applicant will look at ways to recycle as much demolition and construction waste as possible. No maritime transport will be used to transport waste off site.

2. Noise during construction – the most sensitive part of the salt pans for breeding birds is the inner part. Birdlife is expecting the black winged stilt to start breeding here in 2022 (breeding period: between March and June). The birds do not currently breed here but there is potential for them to start as early as 2022. Although it was acknowledged that the proposed development is at some distance from the salt pans and also noting that there are intervening buildings in between, it was still agreed that noise monitoring will be carried out – a noise monitoring station will be selected in agreement with Birdlife in close proximity to the Reserve. Monitoring will be done

before and during works. The monitoring framework would be submitted to ERA as a requirement to have an Environmental Monitoring Plan.

3. Light during construction – no flood lights will be used. There will be a red beacon light on the highest tower crane but this is not expected to have a significant impact on avifauna.

4. Noise during operation – Birdlife was concerned about mass events that may be held at the new hotel. The Applicant explained that the operation will be similar to the pre-Covid situation. The Applicant also has an interest to control operational noise due to the hotel guests at both the Sunny Coast and the Suncrest.

5. Light during operation – the Applicant explained that an international firm (Frank Franjou) has been engaged to prepare a lighting plan that is cognisant of local requirements, including guidelines issued by Birdlife. This will be submitted to ERA.

6. Marine environment – Birdlife noted potential impact on the marine environment during works. The Applicant explained that the seawalls currently on site would be retained and works would not be carried out beyond the seawalls. Notwithstanding, it was agreed that a silt curtain would be deployed if monitoring showed an impact on the marine environment.

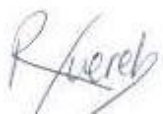
7. Landscaping – Birdlife iterated that landscaping should be in line with the predominant environment. The Applicant explained the landscaping concept including use of open spaces and trees to provide shade.

8. Birdlife was concerned with the possible direct or indirect creation of duck/cat villages which we often see with touristic developments. Birdlife expressed a desire not to have such activities as their spill-over effect to Is-Salini reserve would have an ecological impact. The Applicant is in full agreement and will not allow such 'villages'.

Based on the above it was concluded that the Applicant's Consultants would prepare an Environmental Monitoring Plan that would address the construction impacts as discussed above. Monitoring points at the Reserve would be agreed with Birdlife. The Applicant also agreed with Birdlife Malta to keep communication lines open so that any potential impacts that may be picked up at the Salini Reserve would be immediately relayed to the Applicant's Team.

I trust the above meets ERA's requirements.

Yours faithfully



Rachel Xuereb
Director, Adi Associates Environmental Consultants Ltd