



PA/04777/20

**REDEVELOPMENT OF THE COMINO HOTEL &
BUNGALOWS**

**ENVIRONMENTAL IMPACT ASSESSMENT
REPORT**

NON-TECHNICAL SUMMARY

Version 1: September 2021



Report Reference:

Adi Associates Environmental Consultants Ltd, 2021. PA/04777/20: Redevelopment of the Comino Hotel & Bungalows. Non-Technical Summary to Environmental Impact Assessment Report. San Gwann, September 2021; ii + 24 pp.

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Quality Assurance

PA/04777/20
Redevelopment of the Comino Hotel & Bungalows
Non-Technical Summary to EIA Report

Report for: **HV Hospitality Ltd**



IEMA Transforming the world to sustainability

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Revision Schedule

Rev	Date	Details	Written by:	Checked by:	Approved by:
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File ref: G:_Active Projects\EIA\KEM003 - EIA Comino Hotel\EIA Report\NTS English.docx

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INTRODUCTION

1. This Environmental Impact Assessment (EIA) Report was commissioned by HV Hospitality Ltd with respect to a proposal to redevelop the Comino Hotel and Bungalows (see **Figure 1**). The whole of Comino is designated a Rural Conservation Area and a Nature Reserve, in addition to being a Special Area of Conservation, a Special Protection Area, and a Natura 2000 site.
2. The proposal is to redevelop the existing 100-guestroom Comino Hotel and bungalows complex located on the north coast of the island of Comino, respectively in San Niklaw Bay and Santa Marija Bay. Specifically, the proposal is to provide for a new hotel and serviced bungalows (described as ‘Santa Marija Village’). The proposed hotel will comprise 71 guestrooms, with amenities including food and beverage outlets, outdoor swimming pools, and a spa. A total of 21 bungalows are proposed in place of the existing bungalows, together with a restaurant and a small general store.
3. In April 2020, the Applicant submitted a Full Development Permit application (PA/04777/20) for the “*Proposed demolition of existing hotel at San Niklaw Bay and existing bungalows at Santa Marija Bay. The proposed development consists of part excavation and the construction of Class 3b Hotel (140 beds) at San Niklaw Bay area and individual serviced Bungalows (21 units) at Santa Marija Bay area with ancillary facilities and amenities including Spa (Class 3c), bars/lounges (Class 4c) and restaurants (Class 4d), upgrading the existing berthing facilities (Class 3d); construction of swimming pools; reservoirs; complete upgrade of the infrastructure systems and back of house facilities. Upgrading and reinstatement of the natural ecological and existing disturbed terrain in both San Niklaw and Santa Marija areas in accordance with the Gozo and Comino Local Plan.*”
4. In March 2021, the Environment and Resources Authority (ERA) advised the Applicant that the development required an Environmental Impact Assessment (EIA), specifically, the submission of an Environmental Impact Assessment Report, in accordance with Schedule I, Category I, Section 7.1.1.1 of the *Environmental Impact Assessment Regulations* (as amended, S.L. 549.46).
5. Hereafter in this EIA Report, the proposed development is referred to as ‘the Scheme’. A detailed description of the Scheme is provided in **Chapter 3** of the EIA Report.

Purpose of the EIA Report

6. The purpose of the EIA Report is to present the findings of the EIA. EIA is the process of systematically assessing the likely significant environmental impacts of development proposals. EIA also ensures that the significance of these impacts, and the scope for reducing them, is clearly understood by the public, and by ERA and the PA before a decision is made on whether or not the

development should be approved.

Terms of Reference

7. The Terms of Reference (ToR) for the EIA were prepared by ERA, in consultation with the relevant Government Departments. The final version of the ToR is available in **Technical Appendix I: Terms of Reference and Method Statements**.
8. The ToR were formulated following a scoping exercise, undertaken by ERA, to identify the issues to be considered in the EIA. The ToR focused on those impacts ERA considered likely to be significant and, therefore, requiring further assessment. The ToR also described the various components of the EIA.

Method Statements

9. Method Statements were prepared to assess the impacts of the Scheme in respect of the topic areas: *geo-environment, terrestrial ecology, marine environment, marine ecology, terrestrial cultural heritage, marine archaeology, landscape and visual amenity, and noise and vibration emissions*.
10. The Method Statements outlined the baseline survey work to be carried out, the methodology to be used to assess the predicted impacts, and the means by which the significance of the impacts would be determined. The Method Statements were agreed by ERA and are

reproduced in **Technical Appendix I: Terms of Reference and Method Statements**.

EIA APPROACH

11. Baseline surveys were undertaken in relation to the topic areas *geo-environment, terrestrial ecology, marine environment, marine ecology, terrestrial cultural heritage, marine archaeology, and noise emissions*, having regard to an 'Area of Influence' (A of I) for each topic area, agreed in consultation with ERA.
12. A detailed assessment of the Scheme's impact on the features present on / within the Scheme site and the A of I was undertaken, and any potential environmental benefits of the Scheme were identified.

Significance of Impacts

13. Assessment of the significance of impacts arising from the Scheme is a key stage in the EIA process. This judgement is critical in informing the decision-making process. However, defining significance can be difficult. In general terms, environmental significance involves assessing the amount of change to the environment perceived to be acceptable to the community (Sippe, 1999).
14. The following criteria were used in the EIA to assess the significance of an impact:
 - type of impact (adverse / beneficial);

- extent and magnitude of impact;
 - direct or indirect impact;
 - duration of impact (short term / long term; permanent / temporary);
 - comparison with legal requirements, policies and standards;
 - sensitivity of receptor (residential dwellings, hotel, recreational areas, etc.);
 - probability of impact occurring (certain, likely, uncertain, unlikely, remote);
 - reversibility of impact;
 - scope for mitigation / enhancement (very good, good, none); and
 - residual impacts.
15. Using these criteria, the significance of the negative impacts arising from the Scheme was categorised, as follows:
- **not significant**, where the impact is environmentally acceptable;
 - **minor significance**, where the impact is manageable;
 - **moderate significance** (where applicable), where the impact may be manageable in certain circumstances, although is likely to require implementation of suitable mitigation measures; and
 - **major significance**, where the impact is environmentally damaging and requires redesign or mitigation measures to minimise it.
16. The EIA includes an assessment of the significance of predicted impacts and, following the implementation of any proposed mitigation measures, the significance of any residual impacts. A summary of the identified significant impacts is included in **Chapter 13** of the EIA Report. The recommended mitigation measures, and residual impacts, are described in respect of each topic area, at the end of the relevant chapter (see **Chapters 5 to 12** of the EIA Report) as well as in **Chapter 13**.
- Uncertainty**
17. The EIA process is designed to enable good decision-making based on the best possible information about the environmental implications of a proposed development. However, there will always be some uncertainty as to the exact scale and nature of the environmental impacts. This arises through shortcomings in information, doubts, or lack of certainty on the likelihood that an incidence will occur, and/or due to the limitations of the prediction process itself. Where uncertainties have arisen, and

where they remain, this is clearly stated in the EIA Report.

Consultation

18. There has been consultation with ERA throughout the EIA process. Additionally, at the outset of the EIA process, the Consultants invited the Għajnsielem Local Council and the non-governmental organisations (NGOs) BirdLife Malta, NatureTrust – FEE Malta, Din l-Art Hejwa, Flimkien għal Ambjent Aħjar, Moviment Graffiti, Friends of the Earth and Fondazzjoni Wirt Artna to meet to discuss the matters they considered important for the EIA.
19. The Consultants met with the Għajnsielem Local Council, BirdLife Malta, Moviment Graffiti, Friends of the Earth, and Nature Trust- FEE Malta. The feedback from these consultations is described in **Chapter 3** of the EIA Report. At the time of writing the EIA Report, none of the other NGOs had accepted the invitation to meet with the Consultants.

Figure I: Location of the Scheme



ASSESSMENT OF ALTERNATIVES

Alternative Sites

20. The Scheme is a redevelopment project hence, no alternative sites were considered by the Applicant.

Zero Option (Do-nothing Scenario)

21. The ToR issued by ERA require that the alternative assessment considers the zero option, or ‘do-nothing’ scenario, which envisages there being no intervention on the site in connection with the Scheme. This alternative option considers the way the site would develop in the absence of the Scheme.
22. With no intervention on the Scheme site in connection with the Scheme, the site would remain a hotel resort, but interventions would likely still be required to allow it to continue to compete in the tourism accommodation market. These interventions could range from small-scale refurbishments to more significant part-redevelopments of the existing fabric and amenities. Many of the structures on the Scheme site have deteriorated and some require demolition as they are structurally unsound. The tennis courts have already collapsed. Enemalta cables all require replacement.

Alternative Layouts and Techniques

23. Before and throughout the EIA process, the Applicant

consulted both the Planning Authority and the Environment & Resources Authority. The design principles of the Scheme have remained the same throughout the discussions; however, the footprint at the Bungalows site was amended following discussions with ERA. The length of the piers was also reduced, and a pier previously proposed off the north coast of Santa Marija Bay was eliminated altogether.

DESCRIPTION OF SCHEME

24. The Scheme comprises two distinct elements – (i) redevelopment of the site of the Comino Hotel at San Niklaw Bay to provide for a new hotel (71 bedrooms) and ancillary facilities including two pools, a Spa and restaurant, and (ii) redevelopment of the bungalows site at Santa Marija Bay, to provide for 21 new serviced bungalows and a restaurant, in an area to be known as ‘the village’ (see **Figure 2**). The Master Plan also shows that there will be two piers – one at each Bay approximately 15 metres in length at San Niklaw and 16 metres at Santa Marija.
25. The serviced bungalows will be for sale, and prospective owners can opt to put their property in a rental pool, serviced exclusively by the hotel. Bungalow owners/guests will make use of the hotel facilities.
26. It is also proposed to demolish service rooms, such as the pump room and the obsolete reverse osmosis plant near

the Hotel. Excavation works will be carried out to house new below-ground structures, as well as infrastructural services. Following construction of the Scheme, there will also be reinstatement of an existing defective and derelict reservoir located on top of the hill at the rear of the Hotel as well as the existing reservoir at Santa Marija Bay. It is planned to reinstate disturbed land and integrate it with the existing landscaped area, in addition to the soft landscaping.

27. The footpath currently connecting the Hotel to the bungalows will be maintained with some minor interventions including cutting back overgrown shrubs, so the pathway is clear for the passage of a narrow electric buggy. The surface will be cleared from boulders and any areas that have large holes or a very rough surface will be addressed.
28. The Plans presented in **Chapter 3** of the EIA Report illustrate the landscaping at both the hotel and village as well as restoration with natural habitats of previously disturbed areas.
29. The Scheme also requires that the main infrastructure works associated with bringing the utility services to the Hotel and village sites are undertaken by the Applicant. This involves the construction of a new Wastewater Treatment Plant (WwTP), which will replace the old, decommissioned plant currently present in the same

location. Although these works will be covered by a separate application the impacts of the WwTP are addressed in this EIA.

30. It is envisaged to use geothermal boreholes as the heating and cooling system for the Hotel; there are no planned geothermal boreholes for the village. Approximately 145 geothermal boreholes, each measuring approximately 150 m in depth and 150 mm in diameter will be drilled for this purpose. All of the boreholes will be located beneath the footprint of the Hotel building

Scheme Construction

31. A detailed Construction Management Plan (CMP) has been prepared by the Applicant. The soft strip of the Hotel is already completed. The demolition of the Hotel and bungalows will take place in parallel. The excavation will be carried out using hydraulic hammers; the CMP proposed that the rock will be saw cut around the perimeter of the excavation site, to minimise ground vibration.
32. The demolition and excavation waste will be transported off-site by barge (berthed at San Niklaw Bay) and subsequently transported to a licenced dump site in Malta or Gozo; alternatively, dumping at sea is also being considered. The dumping site will be identified and agreed with ERA once the Contractor is appointed.

33. It is planned to use two rigs to drill the geothermal boreholes on the Hotel site. The rigs will be transported on a barge to San Niklaw Bay and will then be tracked from the barge to the Hotel site, where a ramp will be created to access the excavation. The rigs will be demobilised in the same manner once the drilling has been completed.
34. The sub-structure of the bungalows and the Hotel are envisaged to have a reinforced concrete construction. It is intended to have a small batching plant located at the Hotel site. Trucks will transport concrete from the batching plant to the village site along the existing track. The washing out of the trucks will take place at the Hotel site and the contaminated wastewater will be collected in a watertight skip for transportation off-site.
35. Soft landscaping will be carried out once the hard landscaping works have been completed. Careful planting of the native species will take place in the correct season, as advised by the landscape architects and the ecologist.
36. The marine works in connection with the Scheme comprise:
- Temporary placement of a spud barge at Santa Marija Bay for the duration of the construction works at the village site (as further described below);
 - Realignment of the existing quay at San Niklaw Bay;
- and
- Construction of a new pier at Santa Marija Bay and a new pier at San Niklaw Bay.
37. A new Wastewater Treatment Plant (WwTP) will be installed (although this will be part of a separate planning application). The existing discharge pipe from the existing treatment plant to the discharge location will be used for the new WwTP. The new WwTP will be located on the site of the existing decommissioned plant. Upgrades of the existing chambers will be carried out by the WSC. Where possible, the existing WSC infrastructure will be used, with new water meter installations required and distribution pipework within the respective sites.
38. Given the location of the Scheme on Comino, all labour and materials will necessarily be shipped to the Island. All deliveries of construction materials and labour in connection with the Hotel site will arrive at San Niklaw Bay, where the existing private quay will be used as a berth.
39. There are two existing public quays at Santa Marija Bay; these will be used to facilitate transportation of materials and labour in connection with the village site. The north quay will be used during good weather only, due to its exposed location. Due to the limited depth of water within Santa Marija Bay, a spud barge will be placed at the inner quay; this barge will extend out to where the water

is 2.5 m in depth (an estimated 30 m from the existing quay). Using the spud barge to facilitate the transportation of materials and labour for the village site will serve to reduce the number of vehicle movements on land between Santa Marija Bay and San Niklaw Bay. However, it is still envisaged that there will be an estimated 20 trips a day between the hotel and the village.

40. Subject to the approval of the necessary planning and environmental permits, the demolition and excavation works are anticipated for award in the first quarter of 2022 and for commencement of works on site in the second or third quarter of 2022, pending the issue of an executable development permit. Construction of the superstructure is envisaged to commence in the first quarter of 2023. It is anticipated that the Hotel and village will open in April 2025. At this stage it is envisaged that the village and the Hotel will open at the same time.

Waste Management during Construction

41. Waste generated during construction will primarily consist of site clearance as well as demolition and excavation waste; it is envisaged that there will be approximately 21,224 m³ from site clearance of the Hotel and 22,914 m³ from site clearance of the bungalows. The demolition of the Hotel is expected to generate approximately 22,022 m³ of material and the bungalows 13,136 m³. Approximately 51,541 m³ of excavated material will be generated from the Hotel site and 14,358 m³ from the

bungalows site, primarily rock. It is intended to reuse some of the excavated material on site; the rest of the material will be appropriately disposed of in accordance with the current regulations and using registered waste carriers.

42. Approximately 4,105 m³ of soil will be cleared from the Scheme site. It is envisaged that all the soil will be reused in the landscaping and restoration aspects of the Scheme.

SCHEME OPERATION

43. It is envisaged that the hotel will operate between April and October. During the other months there will still be staff working there, including the General Manager of the property, and others to ensure maintenance of the entire property, servicing of the bungalows, security etc.
44. Before it ceased operations, in October 2019, the existing Comino Hotel and bungalows complex had a staff compliment of approximately 45 full-time equivalent staff. It is envisaged that the full-time equivalent staff complement of the Scheme when it comes into operation will be approximately 140.

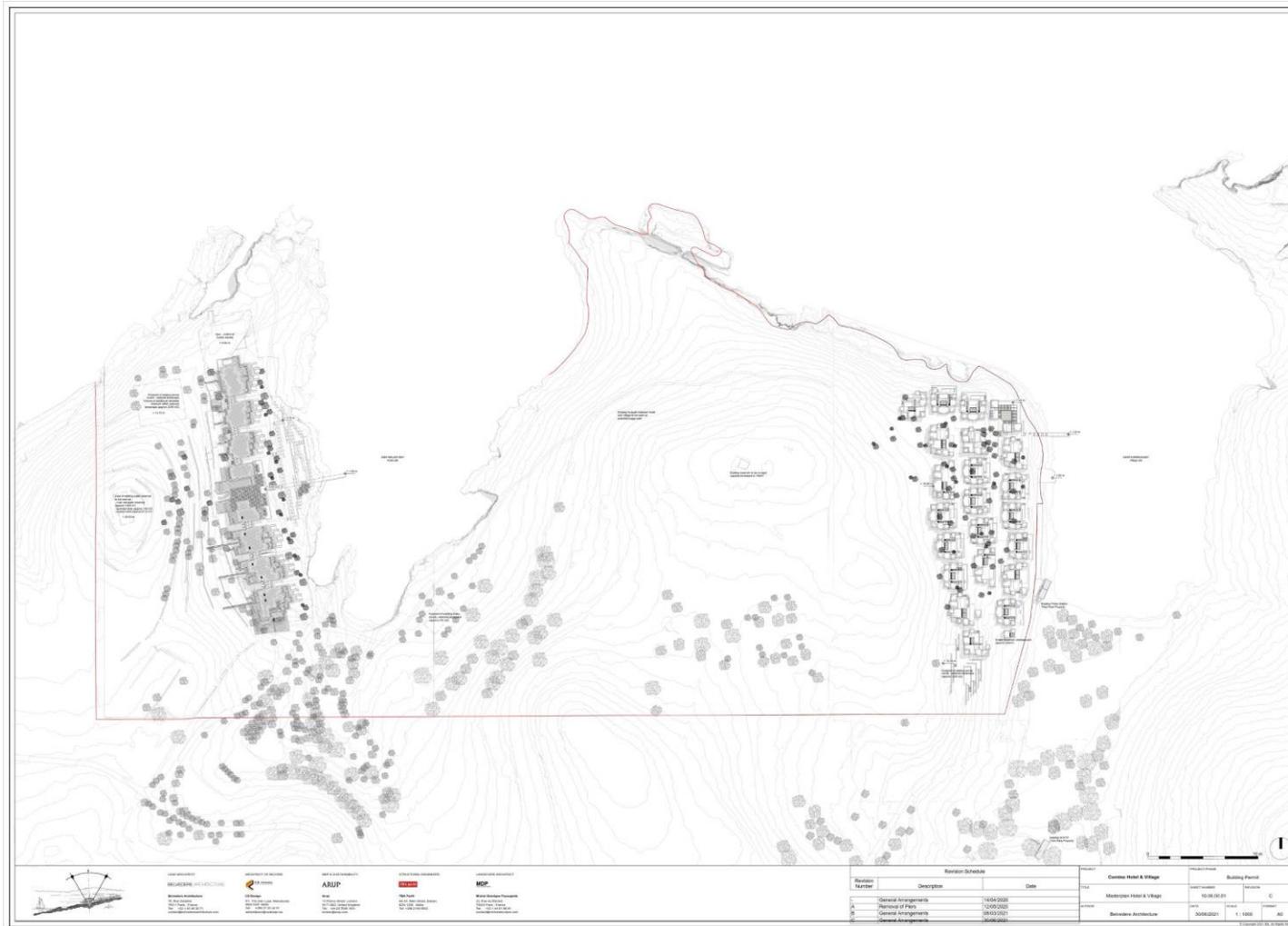
Waste Management

45. The operational waste likely to be generated by the Scheme will be primarily municipal waste. The Scheme will have three waste rooms: one in the Hotel and two at the village (including one at the village restaurant). All

waste generated on the Hotel site will be brought to the main waste holding area located in the basement of the Hotel. All waste generated in the bungalows at the village will be brought to the main holding waste area found near the substation at the village. The restaurant and retail outlet at the village will store waste in the restaurant holding area. It is envisaged that all the waste generated by the Scheme will be transported to Gozo.

46. In the case of the Hotel, waste will be removed off site on a daily basis. In the case of the village restaurant, removal of mixed MSW will be undertaken six days a week and removal of separated waste streams will be undertaken three times a week.
47. Any hazardous waste transferred from the Scheme site will be accompanied by a valid hazardous waste consignment permit issued by ERA. Each consignment under the consignment permit will also be accompanied by a consignment note.

Figure 2: Master Plan of the Scheme



SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION

48. The predicted impacts of the Scheme were assessed on a topic area basis, in accordance with the ToR. Particular attention was given to the predicted principal negative impacts and how these could be mitigated.
49. The potential major negative impacts identified during the assessment, related to:
- Geo-environment, arising from the excavation of the site for the Scheme;
 - Terrestrial Ecology, in respect of habitat loss at the village, and potential damage from trampling by guests and residents;
 - Marine ecology, from the impacts on the protected *Posidonia oceanica* meadows from construction of the piers and activities in the bays during construction;
 - Cultural heritage due to the removal of two features that are considered to merit a Grade 2 level of protection as well as the impact on the cultural landscape at the Village;
 - Landscape, in respect of the Local Landscape Tracts of low-lying coast and built areas / urban features with regards to the Village only;
- Visual amenity, in respect of changes to the views from Viewpoints 3 – 5 (south of San Niklaw Bay, Santa Marija Bay and east of Santa Marija Bay). A moderate to major impact is identified in respect of the change to the view from Viewpoint 7 (from Inland, south of Santa Marija Bay).
50. Major positive impacts have been identified in relation to the visual amenity from viewpoints 6 (inland, south of San Niklaw Bay) and 10 (Hondoq ir-Rummien, Gozo), moderate from viewpoint 1 (east of San Niklaw Bay) and minor to moderate from viewpoint 9 (Qala, Gozo). Positive impacts of the hotel have been assessed on the Local Landscape Tracts of the low-lying coast (moderate) and built areas / urban features (major).
51. A minor to major beneficial impact has also been identified with regards to the removal of Invasive and Alien Species (IAS) that were largely planted in the past as part of the landscaping at the hotel and bungalows.
52. A minor beneficial impact will result from the Ecological Restoration Plan to be implemented as part of the Scheme. Although the restoration will not replace the loss of natural habitat in terms of the extent of biodiversity, structure and function in the short-term it is expected that the larger the amount of degraded area that is successfully restored, the more significant will the

contribution from restoration be.

Geo-environment

53. The impact on geological resources is considered to be of major negative significance since the Scheme involves the extraction of rock and soil from the site
54. The predicted impact of the Scheme on ground water contamination is considered to be of no significance to minor significance.
55. No part of the Scheme falls within the catchments of the two valleys: the Scheme lies where run-off is discharged into the sea in a diffuse way along the coastline. Water run-off during excavation will generally remain contained in the excavation area itself, eventually filtering through the rock. It will be channelled to the lowest point of the excavation. Any water collected in the excavation pit would need to be managed and may require settling and then be pumped out in a controlled and supervised manner as directed by ERA. Given this approach and noting the location of the Scheme, it is considered that the predicted impact on surface water run-off during the construction of the Scheme is likely to be of minor significance.

Terrestrial Ecology

56. There will be loss of habitat at both the hotel site and the village. The loss at the hotel site is because the new

development is being set back from the coast. The loss at the village is a result of the increase in the number of buildings that will result in further encroachment on the surrounding garrigue habitat. The impact is irreversible since the ecological value of virgin habitat is higher than that of restored habitat. The impact of the Scheme is therefore considered to be of major significance.

57. The regular movement of heavy vehicles on dusty roads is likely to increase dust generation significantly along the routes between the hotel and the village. Disturbance effects from construction are temporary and not (relatively) long-lasting, such that impacts from effects such as dust entrainment and deposition on adjacent vegetation are considered of minor significance.
58. During operation, the paths will be used by hotel buggies to transport passengers and vehicles will be used to transport goods. Therefore, over time, dust impacts on the garrigue habitat adjacent to and in the vicinity of the paths will continue. In the absence of mitigation, the impact could be of major significance in the long-term. The impact will be reduced substantially (to minor) if the surface of the road connecting the hotel to the village is treated with binding material, as also proposed in the Gozo and Comino Local Plan.
59. A total of 380 protected trees will be removed, 63 of which will be destroyed as they are not transplantable. In

accordance with the Guidelines on Trees, Shrubs and Plants for Planting and Landscaping in the Maltese Islands (2002), compensatory planting will be required. The loss of protected trees is of major significance especially in the context of a limited tree cover on Comino.

60. The landscaping plan anticipates the planting of 1,281 protected trees. The Restoration Plan describes the different areas to be restored and planted. Given the extensive planting envisaged in the Restoration Plan, the impact on the loss of protected trees is considered to be of minor significance. However, in order to ensure the successful transplanting of existing trees and the implementation of both the landscaping and restoration plans, works and their ongoing maintenance are to be supervised by an ecologist.
61. Thirty-three alien and invasive species, mostly planted as part of the landscaping scheme in the past, will be removed. The removal of IAS and ensuring that no further invasive and alien species are included as part of the new landscaping scheme, will result in a minor to major beneficial impact.
62. The presence of a hotel and the serviced bungalows means that the area is expected to experience continued footfall as visitors and the new bungalow owners may decide to explore the island (on foot). This is likely to result in trampling of the habitats in the area. Such

disturbance could potentially result in negative impacts on habitats of conservation significance in the area.

63. However, the proposed use of the bungalows from a tourism accommodation complex that operates for part of the year (like the hotel) to a potentially permanent residential complex could significantly increase the risk of trampling. The impact, though uncertain in view that the likelihood of owners transferring to live permanently on the island is an unknown, would be of major significance in the light that the current resident population counts only 3 persons.
64. The impacts resulting from lighting at the hotel and village are considered to be of minor significance because the lighting plan for the Scheme was developed in line with the Guidelines for Ecologically Responsible Lighting (issued by Birdlife Malta in collaboration with NTM-FEE). However, given that the bungalows will be sold to multiple owners, there is the potential for individuals to use additional lighting outside of the approved guidelines, this could result in a major impact. However, it is noted that the bungalows will be serviced by the hotel. Notwithstanding, it is important that a condition is included in the operational permit that no additional lighting can be added to the bungalows by the individual owners. In this scenario the impact would be of minor significance.

65. The noise assessment on avifauna concludes that in respect of continuous noise during the construction of the Scheme, noise levels could potentially be of no significance to of minor significance. The assessment predicts that noise reaching the bird populations at the receiver locations from outdoor entertainment activity with only background noise playing is of no significance. In the scenario where amplified noise is playing at full volume (from the terrace of the village restaurant, from around the hotel pool area, or from the terrace of the nearest bungalow), noise levels could exceed the ambient noise levels in the critical frequencies for communication, resulting in an impact of minor significance. In respect of all scenarios for outdoor entertainment activity in the immediate vicinity of the noise source, the impact could potentially be of minor significance (for background music) to moderate significance (for amplified music played at full volume) in locations in close proximity to where the activity is taking place.
66. As illustrated in the landscaping plans, no invasive and alien species will be used. There will therefore not be any significant impact that could arise in terms of alien escapes from landscaping. However, given that it is proposed that although the bungalows are serviced by the hotel they will still be privately owned, the potential for the introduction of IAS by individuals in their gardens is considered to be a potentially significant risk and the impact could be of major significance on Comino. It is therefore important

that a condition is included in the operational permit that no additional planting / landscaping can be added to the bungalows by the individual owners. In this scenario the impact would be of minor significance.

67. The EIA Report describes the Ecological Restoration Plan to be implemented as part of the Scheme. Restoration will result in a positive impact.

Avifauna

68. The shrubs and trees of the landscaping surrounding the hotel and bungalows provide shelter and food to a variety of migrants, mainly passerines. Prior to construction, the landscaping in the immediate vicinity of the hotel and bungalows will be removed. The removal of this habitat will be temporary for the duration of the construction. Extensive landscaping of the Scheme together with the proposed restoration will be implemented following construction. The impact of the removal is considered to be of minor significance. The implementation of the landscaping and restoration plans will mitigate the impact of the removal and will result in a neutral impact. Upon successful implementation of the Plans and maturing of the shrubs and trees the impact is likely to be of minor beneficial significance.
69. Given that the Comino hotel and bungalows are located on the edge of the coast, unshaded lights used during the demolition-construction phases as well as when they are

operational will have a negative effect on both terrestrial as well as pelagic seabird species. The latter are especially prone to lights close to their breeding colonies. In the absence of a sensitive lighting plan, there is the potential therefore for a major impact on birds from potential additional lighting generated by the Scheme. It is noted, however, that the hotel and bungalows had been operational for decades, coexisting alongside the seabird colonies. Lighting plans have been prepared in accordance with Birdlife Malta's & NTM-FEE's *Guidelines on Ecologically Responsible Lighting*. Therefore, it can be considered that as long as there is no increase to the lighting compared to the previous operations and the lighting plan is executed as planned, the impact will be not significant to minor. However, given the increase in buildings at the village and in view that these units will be separately owned, it should be considered that the impact could become of minor to major significance if individual owners depart from the lighting plan and decide to include their own lighting that is not in line with the guidelines (whether additional luminaires or changes in the light source). However, it is noted that the bungalows will be managed as a complex with the hotel. Notwithstanding, any operational permit should include a condition that individual bungalow owners will not be allowed to install additional lighting. With this condition in place the impact is expected to be of minor significance.

70. The noise impact on birds has been described in the

Ecology Section above.

Marine Environment

71. As mentioned, the Scheme envisages the construction of a Wastewater Treatment Plant in the location of the current disused treatment plant. Once operational, all sewage generated on Comino will be treated to produce Treated Sewage Effluent in conformity with the requirements of the Urban Wastewater Directive. The improved quality of the effluent discharged into the marine environment, means that the Scheme will result in a neutral to positive impact on water quality at the discharge point.
72. The interventions proposed by the Scheme that could affect the configuration of San Niklaw and Santa Marija Bays are two piers, one at each Bay. The impacts of the Scheme on the configuration of the coast, including the sandy beaches, are deemed to be of no significance. Impacts on the seabed are deemed to be minor due to local scouring at the piers.

Marine Ecology

73. At San Niklaw and Santa Marija Bays the tip of the pier (i.e., the part furthest away from the shore) as currently proposed appear to be built over *Posidonia oceanica* meadows. This needs to be confirmed on site as the habitat maps produced as part of the EIA Report are not

intended to be used for the design of marine structures. *Posidonia oceanica* meadows are a priority habitat under the Habitats Directive and the proposed interventions will lead to direct damage to parts of the meadows from such drilling works, as well as potentially lead to subsequent loss around the piles as a result of the halo effect caused by scour leading to an impact of major significance. The impact of the piers can be mitigated by shifting the location of the piles away from the *Posidonia* meadows, shortening the pier further, or shifting the pier in its entirety to completely avoid the *Posidonia* meadows.

74. Losses to the other habitats that will be impacted (i.e., sand and infralittoral algae on bedrock) are small, but since these are not priority habitats, the impact is deemed to be of minor significance.
75. Although the physical impact on the seabed is small by virtue of the construction methodology proposed (anchor pins and piles), the presence of the piers will result in permanent shading of the benthic habitats beneath and the immediate vicinity of the piers, leading to less sunlight reaching the seabed. However, in view of the restricted depth of water at this location, and the narrow nature of the pier, it is considered that the availability of light reaching the benthic habitats will not be severely reduced and the impact is deemed to be of minor significance.
76. Construction activities, including the interventions proposed to repair and upgrade the jetties, could result in a temporary increase in turbidity due to: (i) increase in marine traffic during the construction stage, in particular larger vessels; (ii) construction of piers and upgrading of jetties / quays; and (iii) stormwater runoff during construction of the Scheme. Given the temporary nature of this impact, and the possibility of employing successful mitigation measures through good construction practices, it is likely to be of minor significance.
77. Deployment of construction phase craft (such as barges) may also result in localised impacts on the seabed from spud deployment, operational or accidental discharges, scour from prop wash, or abrasion at shallow depths. Impact significance will depend on the extent of the impact and the importance / sensitivity of the benthic habitat affected. Impacts on priority habitats will be of major significance. Other effects are deemed to be minor. Such effects will need to be minimised through careful management and supervision of the marine operations, including avoiding *Posidonia* meadows in spud deployment, correct on board operations to avoid discharges or loss of anthropogenic items overboard, controlling of speed of movement of craft to restrict impact from prop wash, and using appropriately sized craft to avoid seabed abrasion. As long as proper measures are taken, the impacts are deemed to be of minor significance.

Cultural Heritage

78. The Consultants consider that the existing Hotel and bungalows merit a Grade 3 level of protection¹. The Scheme envisages the redevelopment of the buildings in their entirety. Hence, having regard to the significance criteria, it is considered that the Scheme will have a minor negative impact on this cultural heritage feature.
79. At Santa Marija Bay there is a Grade I Chapel surrounded by a Class B Archaeology Buffer Zone, which abuts the Scheme site. A field room and well are also close to the site boundary. None of these features will be lost as a result of the development of the Scheme; however, potential disturbance must be prevented in particular to the well, which is classified as a potential Class B feature. The impact is considered to be of minor significance.
80. A Nissen hut and mortuary room are found within the site boundary and are both proposed for protection as Grade 2. Both structures are proposed to be demolished as a result of the Scheme. Noting the proposed level of protection, the impact is of major significance.
81. The existing Wastewater Treatment Plant is also proposed for protection at Grade 3. Although parts of the building may be reused to host the new WwTP, this will depend on the condition of the actual building. However, given its proposed level of protection the impact is likely to be of minor significance.
82. There are also a number of Grade A rubble walls within the Scheme site. At Santa Marija Bay the walls are relatively removed from the construction site so the potential impact here is not significant as no walls are earmarked for demolition. However, it needs to be ensured that there is no careless movement of machinery that could impact the walls. There is a Grade B wall close to the WwTP. Any works in this area must also be mindful of the wall to avoid its disturbance. The impact here is deemed to be not significant to minor.
83. At San Niklaw Bay there are a number of Grade A rubble walls to the north and the west of the hotel that are in close proximity to the hoarding. Careful mapping of the features and their protection must be undertaken before works on site commence.
84. The impact on the cultural landscape at the hotel site is considered to be neutral because there are no particular

¹ The Structure Plan for the Maltese Islands 1992 explains that Grade 3 level of protection is given to “buildings which have no historical importance and are

only of minor architectural interest. Demolition may be permitted provided the replacement building is in harmony with its surroundings.”

cultural heritage features in the vicinity of the hotel. However, given that the bungalows will occupy a larger area, they will approach the Chapel and two Grade 2 features are proposed to be removed, the impact on the cultural landscape at the village is considered to be of major significance.

85. While no extensive features of potential cultural heritage were uncovered as part of the marine archaeology study, there is a small possibility that works may disturb any buried artefacts. At this stage, the impact of the development is therefore likely to be not significant; however, this will only be confirmed once works start and there is archaeology monitoring to ensure that no artefacts are impacted.
86. The Marine Archaeology Report also carried out a risk assessment that considered the direct impacts of works and their likelihood (such as the direct impact on the seabed) as well as secondary effects due to the works, such as the impact posed by propellor wash from vessels. The latter takes into account the potential course of vessels approaching the pier. The seabed either side of the piers will likely experience a greater degree of prop wash (due to berthing) than within the channel and the vessels' approach. Although the risk varies as described, given that there are no known artefacts near the piers or in the potential approach of the vessels and also noting the amount of existing boating activity in the Bays, the

impact is uncertain and likely to be not significant or at worst minor.

Landscape and Visual Amenity

87. The impact on landscape character is considered to be of no significance to of major significance. The impact of moderate significance for the hotel refers to the change in the garrigue areas Local Landscape Tract; at this LLT the impact of the bungalows is considered to be moderate to major. The hotel is predicted to have positive impacts on the landscape in respect of the low-lying coast and built-up areas / urban features LLTs where a moderate and major impact is predicted respectively. The bungalows are predicted to have a major negative impact at the low-lying coast and built-up areas / urban features LLTs.
88. The impact of the Scheme on visual amenity is considered to be of minor to major significance. Major impacts in respect of visual amenity refer to changes to the views from south of San Niklaw Bay, Santa Marija Bay and east of Santa Marija Bay (viewpoints 3, 4, and 5). A moderate to major impact is identified in respect of the change to the view from inland, south of Santa Marija Bay (viewpoint 7). The view from west of Santa Marija Bay (viewpoint 2) is moderate whereas that from Hondoq ir-Rummien, Gozo (viewpoint 8) is of minor significance. Major positive impacts have been identified in relation to the visual amenity from inland, south of San Niklaw Bay

(viewpoint 6) and Hondoq ir-Rummien, Gozo² (viewpoint 10), moderate positive from east of San Niklaw Bay (viewpoint 1) and minor to moderate positive from Qala, Gozo (viewpoint 9).

Noise Emissions

89. The noise assessment predicts that noise reaching the human sensitive receptors during the construction of the Scheme varies depending on the stage of the construction. Hence, in the case of the closest human sensitive receptors, the noise levels during the construction of the Scheme could potentially be 'not significant'. It is also notable that this assessment assumes the worst-case scenario, not taking account of the mitigating effect of any barriers (where the hotel construction site will be enclosed). The latter will serve to reduce the levels of noise reaching the sensitive receptors during all stages of the construction.
90. The impact of noise on birds is discussed above.

Mitigation

91. Where appropriate, mitigation measures have been identified and communicated to the Applicant. These mitigation measures are described at the end of each topic area chapter and are listed in **Chapter 13** of the EIA Report. Some of the mitigation measures are already taken account of in the Scheme design or are being taken forward in the Construction Management Plan (CMP) that has been prepared for the Scheme at this stage. Other mitigation measures are recommended arising from the impact assessment.
92. The following is the list of recommended mitigation measures. It would be appropriate for, and it is recommended that, these mitigation measures be taken account of in the conditions of any eventual development permit.
- Lighting of the footpath between the hotel and the bungalows will be by presence sensors.
 - Implementation of the Lighting Plan as described in **Chapter 3** of the EIA Report and in consultation with ERA.

² There are 2 viewpoints from Hondoq ir-Rummien, Gozo – one directed towards the village and the other towards the hotel.

- Implementation of the Landscaping and Restoration Plans as described in **Chapter 3** of the EIA Report and in consultation with ERA.
 - Transplanting of the protected trees on the Scheme site as described in **Chapter 3** of the EIA Report.
 - Reuse of soil for landscaping.
 - Reuse of excavated material on site where possible.
 - Inclusion in the CMP of measures to address potential runoff during the different phases of construction, in particular during the winter months. Safe storage of material on site must also be addressed in the CMP so that during the rainy season no material is washed into the marine environment.
 - Where excavation material cannot be used on site it should be considered for reuse off site before disposal.
 - Reduction in site footprint to avoid Annex I habitat losses, in particular, a relatively large area of garrigue habitat that is earmarked to be lost at the village.
 - In consultation with ERA, the Applicant should explore ways to reduce dust generation through the implementation of recommendations in the GCLP to create some sort of binding material on the roads to reduce these emissions.
- Any interventions on existing footpaths and pathways to render them more user friendly should not disturb or remove any habitats and cater for surface water infiltration. Any works should be supervised by an ecologist to ensure that no protected species and habitats are impacted.
 - Good site working methods should be employed during the entire construction phase to minimise dust emissions and minimise risk of trampling onto habitats of ecological importance. During construction, these habitats should be cordoned off in order to protect them.
 - Any construction waste materials that cannot be avoided or minimised will be handled in line with accepted waste management procedures and will either be recycled off-site, used as secondary materials in other projects, or otherwise disposed of at licensed facilities in line with waste permits issued by ERA. Any waste materials leaving the site will be carted away by licensed waste contractors (copies of licences of the Contractor and waste carrier details of all vehicles will be provided); all waste carrying vehicles used on site (whether by the Contractor or sub-contractors) will be appropriately registered with ERA, as required by legislation. There should be no

stock piling of waste on site.

- No construction activity to take place between sunset and sunrise.
- Environmental monitoring must be carried out during the demolition, excavation, and construction of the Scheme to ensure potential impacts are mitigated and minimised.
- All interventions on the Island will require environmental permits to ensure that works are carried out in accordance with site specific requirements as dictated in the permits.
- Awareness-raising and information provided within the Hotel and at the bungalows to educate guests to remain on paths and not to trample on protected habitats.
- The exterior lighting of the bungalows must be retained as designed in the lighting plan and no additional exterior lighting shall be allowed to be added by the individual owners.
- Compensatory planting must be implemented in accordance with the MEPA Guidelines. There cannot be additional landscaping especially at the bungalows, (where there are multiple owners), that are not in line with the Guidelines.
- Ensure that mitigation measures related to light and noise pollution are implemented in line with permit conditions.
- Establish a rapport with Birdlife Malta to ensure that the Scheme operations are not affecting key species, including seabirds and terrestrial birds, possibly through the participation in monitoring programmes.
- Confirm through a survey whether any of the anchor pins of the piers are located on or in the immediate vicinity of *Posidonia oceanica* meadows.
- *Posidonia oceanica* meadows should be avoided through either shifting of the anchor points to completely avoid the meadows, or shortening the piers, or shifting their location entirely to be located completely outside the *Posidonia oceanica* meadows.
- The design of the pier deck should ideally also incorporate regular gaps to allow sunlight to penetrate through the structure, thereby minimising the shading impacts of the piers on the seabed habitats.
- The construction of the piers and the upgrading of the jetties and quays should follow good construction practices and minimise the take up of seabed. In addition, the construction works need to be properly supervised to ensure that no construction material spills over into the marine environment, that

deployment of craft avoids impacts on sensitive seabed habitats (e.g., *Posidonia* meadows), and good onboard practices are employed to avoid unnecessary discharges or loss of anthropogenic items overboard.

- When the repair / upgrading works on the jetties and quays are taken in hand, proper silt curtains will need to be deployed and properly anchored to contain any turbidity caused by the works. This will be addressed through the Construction Management Plan for the Scheme.
- Consider the possibility of retaining and incorporating the former mortuary room building within the Scheme, but if this is not possible, it is recommended that the Applicant consults with the SCH prior to any demolition works on the site, to establish what level of recording is necessary, how this recording should be undertaken, and what features should be salvaged, as appropriate.
- The demolition of the Scheme, including the removal of cultural heritage features, should be supervised by qualified archaeologists, reporting to the SCH, and carried out in accordance with the directions issued by the SCH.
- Consideration should be given to reducing the encroachment of the bungalows towards the buffer area of the scheduled Chapel.
- The Construction Management Plan (CMP) for the Scheme should include measures to protect the Chapel and its associated buffer zone, rubble walls and features during construction, including through establishment of protective cordons / barriers, and that the construction works be supervised in order to ensure that these features are not damaged. It is recommended that the SCH is consulted on the CMP, and the particular measures to ensure the protection of the features prior to any construction works (including site clearance) commencing on site.
- It is recommended that a competent authorised archaeologist should be present to oversee any seabed disturbance during the works for the construction of the piers. Additionally, footage from the diver surveys indicate a great deal of anthropogenic glass, concrete, metal, and other discarded objects, especially at San Niklaw Bay. It is therefore suggested that a seabed clean-up could be undertaken and that any possible UCH objects would be recorded and possibly brought to the surface (this would be undertaken by a competent archaeologist). This would be especially important as the amphora sherds identified from the diver footage may well rest within the approach of vessels (and could be further disturbed or moved around the bay).
- The Construction Management Plan (CMP) should

address the control of noise arising from all stages of the construction. In addition to adhering to the provisions of the Environmental Management Construction Site Regulations (S.L.552.09), as amended, the CMP should detail working hours and the types of plant / machinery to be used, as well as outline measures for the control of noise at source.

- It is recommended that noise monitoring is undertaken during all phases of the construction. If noise levels become significant, in relation to the relevant standards / values outlined above, or if evidence of significant noise impact is observed and / or reported, works should be reassessed and alternative methodologies and / or more appropriate control measures should be investigated and put in place. This investigation should be discussed and agreed with the relevant competent authority and addressed in the environmental permit for the construction of the Scheme.
- The playing of amplified music should be restricted only for the purpose of providing good ambience (that is, background music); this restriction must apply to the hotel as well as the individual bungalows. The control of music should be regulated by the environmental permit for the operation of the Scheme. The environmental permit should prohibit the playing of amplified music over the level of

background music.