

Appendix I: Comments received by ERA during the EIA scoping stage (From 25 May 2016 to 15 June 2016)

A. Transport Malta (Email dated 26 May 2016)

Comments	ERA response
Transport Malta has nothing specific to be included in the terms of reference for the EPS	Noted.

B. Ramblers' Association of Malta (Email dated 26 May 2016)

Comments	ERA response
<p>In our opinion it is indispensable that satisfactory answers be given to the following questions before validating the project for planning considerations.</p> <p>1. How can the evident and considerable negative impacts of over-development in a rural area, damage to sensitive ecology in an AEI/SSI, geological risk of cliff collapse and slope stability, visual and landscape deterioration, downgrading of natural bay/coastal area, etc., be economically and socially justified in the national context;</p> <p>2. The financial and land resource outlay for the proposed hotel project seem, at first glance, heavily out of proportion for future returns expected from such a small number of hotel beds. Therefore a presentation of an economic feasibility study of the hotel project in order to assess its future sustainability is warranted with a view that the same fate of the previous hotel will not befall the proposed hotel, and to ascertain that the project is not turned into luxury residential block of apartments.</p> <p>In short the opportunity cost in terms of ecological loss to the Maltese natural environment must be carefully weighed against the social and economic benefit to the nation, not solely to the developer/s.</p> <p>We foresee a greater benefit to the nation if the existing derelict building is removed and the comprehensive threatened area protected in its ecological and scenic glory.</p>	Noted.

C. The Regulator for Energy and Water Services (Email dated 30 May 2016)

Comments	ERA response
<p>The Regulator for Energy and Water Services does not in principle object to these types of developments.</p> <p>Please note, that you are required to consult the REWS when the development includes one of the following:</p>	Noted.

<ul style="list-style-type: none"> • fuel/gas storages • swimming pools • installation of photovoltaic systems <p>as these would require registration / authorisation / permit.</p>	
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D. Environmental Health Directorate (Email dated 03 June 2016)

Comments	ERA response
<p>With reference to your e-mail dated 25 May 2016 regarding subject indicated in caption and following review of the Project Description Statement, 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> <ul style="list-style-type: none"> • Adverse air quality impacts especially from particulate matter (dust) and emissions from heavy vehicles, equipment and machinery, noise and vibration impacts during the demolition, site clearance, excavation and construction phase and the effects of these impacts on sensitive receptors in the Area of Influence and on the general public. • Adverse impacts on the bathing water which although not considered as one of the official bathing sites the coastal area is sought for swimming. • Waste management and disposal issues for all generated waste streams during the construction and operation phase. • Ground water and surface water in terms of water quality including run-off management. • 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. • Traffic management and related problems including access arrangements and safety measures both for pedestrians and vehicular traffic during the construction and operation phase. • Ventilation measures at proposed basement garage. • Pest control management on site and the surroundings especially regarding rodents which could be an issue on the surrounding area during the excavation phase. • The overall cumulative impacts of the development on sensitive receptors in the Area of Influence and the general public. <p>Reservoir harvested rain water should not be used for human consumption or personal use. All water used for human consumption and personal use is to be adequate and potable and preferably</p>	<p>Noted.</p>

<p>from the Water Utility Supply i.e. Water Services Corporation.</p> <p>Applicant is also requested to carry out specific discussions with the Environmental Health Directorate regarding the proposed bar and restaurant, spa and pool ,any water features and other facilities (such as cooling systems, R.O. plants, etc.) in view of specific regulations under the Food Safety Act and the Public Health Act.</p> <p>Proposed cesspit is to be duly registered with the Superintendent of Public Health.</p> <p>The EPS should also include a detailed description of the measures envisaged to prevent, minimize and where possible offset any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and on the general public. This should include details of monitoring programmes that may be proposed. The EPS should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.</p>	
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E. Nature Trust Malta (Email dated 13 June 2016)

Comments	ERA response
<p><u>Introduction:</u> The site is within a Scheduled Area of High Landscape Value and an Area of Ecological Importance.</p> <p><u>NTM notes with concern that:</u></p> <ul style="list-style-type: none"> - The site is in an ODZ. - There is an increase of the building area from 343 m2 to 561 m2, besides realignment of the buildings. This contradicts the Rural Policy and Design Guidance, 2014 Policy 6.2C /3 which does not allow the replacement building to exceed the total floor area of the previous building. - An outdoor pool is included. This questions the 'eco-sustainability' of the boutique hotel being marketed. Besides the excavation per se for this pool, such a pool uses fresh water (+ daily replenishments). It does not make sense to have a pool next to the sea especially for such a small hotel. Point 2 of the screening matrix of the EIA screening has failed to include the pool as a resource use. - A tunnel is to be excavated to provide a pathway for the beach. - The design of the hotel as presented does not provide attempts to blend the hotel with 	<p>Noted.</p>

<p>the surroundings (rural characteristics of the area).</p> <ul style="list-style-type: none"> - Public access to the coast must be allowed (Point 16 of the screening matrix). <p><u>Consequently NTM insists that the following are required:</u></p> <ul style="list-style-type: none"> - An Ecological Impact Assessment. This should be done during the WINTER period – November – April, to establish the full perennial flora of the area especially geophytes. - A geological impact assessment to assess risks during and after excavation works (especially pool and tunnel) and building of the area. Globigerina limestone which is characteristic of the area is rather weak and prone to erosion and fracturing. - A light pollution assessment - A visual impact assessment - A landscape impact assessment - Social impact use of the area b locals (fishing, bathing, boats, fishfarms). <p><u>Please inform Nature Trust as interested party, when the application becomes public.</u></p>	
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F. Marsaxlokk Local Council (Email dated 14 June 2016)

Comments	ERA response
<p>With reference to the underneath, please be informed that the Marsaxlokk Local Council has reviewed the Project Description Statement (PDS) and although at this stage we do not have any points that we would like included in the terms of reference of the said document, as done before, we would like to register our interest in the consultation stage and any relative meetings which might be held in relation the application in discussion</p>	<p>Noted.</p>

G. Front Harsien ODZ (Email dated 14 June 2016)

Comments	ERA response
<p>Front's proposals for the terms of reference for both ODZ Kalanka Hotel:</p> <ol style="list-style-type: none"> 1. Impact on surrounding Area of Ecological Importance during the construction phase must be fully assessed. This would include impact of transportation of the raw materials, impact of works on site. 2. Project Development Statement estimates that project would create 4019 cubic metres of construction waste. Assessment should assess impact of excavation of geological features. 	<p>Noted.</p>

<p>Impacts of proposed excavations, site levelling and site clearance should be assessed. Studies must assess slope stability and possibility of cliff collapse especially in view of interventions on Globigerina Limestone which include the excavation of a tunnel on the beach should be assess</p> <p>3. Social impact on bathers and people who frequent beach should be assessed. Impact on Public accessibility should also be assessed.</p> <p>4. Impact of noise during both construction and operational phase must be assessed and compared to present noise levels.</p> <p>5. Proposal is located in close proximity to the coastal water body MT 112 (Ras il- Fenek to Wied ix-Xaqqa), designated under the Water Policy Framework Regulations, 2004 (Legal Notice 194 of 2004). Any risk to this water body must be fully assessed,.</p> <p>6. Photomontages from different viewpoints including from the direction of the sea, are required to assess impacts on landscape character and visual amenity.</p> <p>7. Impact assessment on public access to coast.</p> <p>8. Heritage appraisal of nearby structures</p> <p>9. Impact assessment of accesibility to heritage structures.</p> <p>10. Reversibility impact assessment</p> <p>11. Estimates of services required (water, electricity, drainage, infrastructure, sanitary, etc..) and the impact of this at local, regional and national levels.</p> <p>12. Waste generation and the cost of attending to this.</p> <p>13. Impact assessment of visual and aesethitic factors (including short, medium and long distance views).</p> <p>14. Ecological design factors</p> <p>15. Impact assessment of water usage</p> <p>16. Impact assessment of precedence setting in terms of further development on ODZ land.</p>	
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H. Din L-Art Helwa (Email dated 15 June 2016)

Comments	ERA response
<p>To whom it may concern,</p> <p>Din L-Art Helwa (DLH) is of the opinion that the ruins of the structure should be removed and the area reinstated to its natural state. DLH is of the opinion that there is no valid justification for the redevelopment of site, and the proposed construction of a larger hotel and all associated amenities. This site is located in an area of high ecological importance which should not be spoilt by touristic developments.</p>	<p>Noted.</p>

<p>DLH is of the opinion that this application should not be processed any further but should it be processed, below please find a list of recommendation as TOR;</p> <ul style="list-style-type: none"> □ Revised proposal which does not exceed the existing footprint of 343m² as per policy 6.2C (3) the replacement building does not exceed the total floor area of the previous building □ A volumetric study in order to have a mass which integrates better into the landscape. The elevation of the proposed development shows a large volume which would overpower the existing bay. □ Impact on usability of beach to the public as well as public access should be studied □ Visual study – renders of the proposal will be required from various strategic points in order to assess impact of the development. These should be taken both from land and at sea with near and distant views. □ A study of light pollution and the effect of such within a sensitive ODZ is to be analyse □ Appropriate landscaping plan. This landscaping would need to consider both the site contours and sensitivity when selecting species. □ A study of waste management during the construction phase would need to be carried out. Waste management could result in pollution of the same bay/area which could cause long lasting detrimental effects. 	
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I. Friends of the Earth Malta (Email dated 16 June 2016)

Comments	ERA response
<p>Please find below Friends of the Earth Malta's submissions in relation to TRK163702 (EA0007/16) - Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities at Ta' Kalanka, Delimara.</p> <ol style="list-style-type: none"> 1. The social and environmental impacts that such a project would create should be properly assessed. This should include public accessibility related issues and any additional land disturbance that might occur in the area around the site. 2. Light pollution issues should be carefully analysed. 3. Noise pollution should also be factored in both during the construction phase but also once the hotel starts operating. 4. The implications of this new hotel with regards to resource and infrastructure (water/sewage/electricity/waste). 5. Visual aesthetics should conform to the characteristics of the place. 6. In depth socio economical analysis on whether the development of this site will be of real benefit 	<p>Noted.</p>

to the surrounding communities and people who frequent the area as compared to removing the existing structure.

7. Applicant has made reference to digging up a tunnel. The structural soundness of this should be properly assessed and relative consent of owner (Government) of underlying land be obtained.

J. BirdLife Malta (Email dated 21 June 2016)

Comments	ERA response
<p>To whom it may concern:</p> <p>As written on ERA's webpage of active public consultations, submissions regarding the above named development proposal can be made until the 27th June.</p> <p>As a reaction on the proposed development TRK 163702 "Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities" in Ta' Kalanka, Delimara, BirdLife Malta would like to submit the following comments:</p> <ul style="list-style-type: none"> □ The proposed development qualifies for an Environmental Planning Statement (EPS) as per Schedule IA, Category 3.3.2.2(ii) of the EIA Regulations, 2007 (S.L. 504.79), hence a full EIS should be prepared and be available for public consultation □ The development site covers an area of approximately 3,646sqm including landscaped areas, however, the current buildings' footprint covers an area of approximately 343sqm. The replacement buildings should not exceed the total floor area of the previous buildings as per the Rural Policy and Design Guidance, 2014, part 6. It is stated in the PDS, that the building area will be increased from 343sqm to 561sqm. This is against the national policy frameworks and should disqualify the planning application. It appears that the conditions that would allow this development to be allowed in an ODZ area are not met, and accordingly these development plans do not qualify for the granting of a permit. □ As stated correctly in the PDS, Policy MD01 of the SPED designates Delimara Peninsula as the Delimara National Park. Hence, in accordance with Structure Plan Policy RCO14, the greater part of the Delimara Peninsula, as defined on the Policy Map, will be designated as a national park where priority will be given to conservation, protection and improvement of the natural heritage. In this location, positive provision will also be made for recreational uses consistent with this objective. Limited commercial 	<p>Noted.</p>

development related to the needs of park users will be considered. Other uses likely to have a harmful or conflicting impact will be refused. The development of "13 luxury suites, 3 superior deluxe suites and 1 presidential suite, a lounge, bar and restaurant, gym, spa and outdoor pool as well as the development of beach facilities (for public use) at Kalanka Bay including public toilets and showers, a first aid room, storage room and waste separation facilities" does not contribute to conserve, protect or improve the natural heritage of the area. It is furthermore not clear in what sense these developments reflect the implementation of "environmentally friendly measures" as stated in the PDS title

□ In the PDS, it is pointed out that in the area, there are a number of small structures that appear to be used by hunters. The hunting activities have to be properly addressed and existing structures have to be demolished to guarantee the conservation, protection and improvement of the natural heritage in the region, particularly if the structures are illegal.

□ The proposed development site is bordering agricultural land in the north. A comprehensive study to analyze the present agro ecosystem, including conditions of soil nutrient and soil biota, is essential to determine potential environmental impacts and risks. It should be identified whether the development would impact land of agricultural value.

□ The proposed development lies within two Areas of Ecological Importance (AEI), one Site of Scientific Importance (SSI), and an Area of High Landscape Value (AHLV). AEI's, SSI's and AHLV's require protection from developments because of their considerable ecological and scientific values. ERA is obliged to safeguard and protect these areas/sites and therefore has to ensure that the proposed development meets the relevant environmental assessment criteria prior to take decisions on the realization of the project.

□ Negative environmental impacts will arise during constructional and operational phase of the project, including noise, vibration, dust, and surface water runoff. The impact of such activities can be transported via sea affecting a larger area of the marine environment. These impacts have to be identified in the EIS and addressed adequately.

□ The development may introduce excessive lighting during the constructions and operational phase, bringing light to an area which is otherwise not provided with any street lighting. The impact of the development in relation to contributing to sky glow in relation or addition to other major developments in the area needs to be carefully assessed, especially with regards to

<p>the impact of certain wildlife such as seabirds which are sensitive to coastal light pollution.</p> <p>□ Traffic will increase both, during construction and operation of the project, including heavy vehicle traffic and traffic due to visitors to the area. This will cause negative impacts on air quality and will limit the availability of public space. Additional parking demand may be caused by the development, resulting in an impact on surrounding land.</p> <p>These impacts have to be identified in the EIS and addressed adequately. It has to be looked into whether this is in line with the obligations of relevant policy plans, such as the SPED.</p> <p>□ The development envisages the excavation of a car park and also a tunnel. This may cause an impact on the surrounding geology and Kalanka beach caused via vibrations caused by the excavation. These impacts have to be identified in the EIS and addressed adequately.</p> <p>□ The national power plant facility is in the immediate surrounding of the proposed development. Emissions and noise resulting from the power plant might have an impact on hotel users which needs to be considered. The EIS should point out respective measurements to ensure that no negative effects on human health and the environment arise.</p>	
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K. Members of the Public (Email dated 06 – 26 June 2016)

No	Comment submitted by	Comments	ERA response
1	Member of public Email dated 06 June 2016	<p>In my opinion it is indispensable that satisfactory answers be given to the following questions before validating the project for planning considerations.</p> <ol style="list-style-type: none"> 1. How can the evident and considerable negative impacts of over-development in a rural area, damage to sensitive ecology in an AEI/SSI, geological risk of cliff collapse and slope stability, visual and landscape deterioration, downgrading of natural bay/coastal area, etc., be economically and socially justified in the national context; 2. The financial and land resource outlay for the proposed hotel project seem, at first glance, heavily out of proportion for future returns expected from such a small number of hotel beds. Therefore a presentation of an economic feasibility study of the hotel project in order to assess its future sustainability is warranted with a view that the same fate of the previous 	ERA acknowledges receipt of your email.

		<p>hotel will not befall the proposed hotel, and to ascertain that the project is not turned into luxury residential block of apartments.</p> <p>3. The development of a permanent private concession contravenes the spirit of the recently enacted Public Domain Act which foresees the public enjoyment of areas of scenic and natural value and forbids development on the coastal perimeter. What assessment is being made of these factors?</p> <p>4. Effective enforcement of conditions laid down in permit is never carried out in Malta. This development will ruin one of the very few pristine sites left in Malta.</p> <p>In short the opportunity cost in terms of ecological loss to the Maltese natural environment must be carefully weighed against the social and economic benefit to the nation, not solely to the developer/s.</p> <p>It is of greater benefit to the nation if the existing derelict building is removed and the comprehensive threatened area protected in its ecological and scenic glory.</p>	
2	<p>Member of public</p> <p>Email dated 14 June 2016</p>	<p>This is a message in favour of redeveloping the existing derelict hotel at Kalanka in Delimara.</p> <p>The area has been neglected for so many years and its about time it gets upgraded. This will help both from an environmental perspective and also an economic one. The south of Malta needs similar projects to enhance the popularity of the area.</p> <p>Thank you for your consideration.</p>	ERA acknowledges receipt of your email.
3	<p>Member of public</p> <p>Email dated 14 June 2016</p>	<p>Kalanka project will do a world of good to the south of the island,</p> <p>Jerma Palace was also very beneficial to the area, it is a pity how derelict the area now looks. Please give your support to the Delimara project.</p>	ERA acknowledges receipt of your email.
4	<p>Member of public</p> <p>Email dated 14 June 2016</p>	<p>I believe that the proposed re-development will act as an anchor for the maintenance of this derelict area. The fact that this development will attract visitors, local and foreign, will reinforce the interest in the area thus spurring the authorities, both local and central to invest in the much needed maintenance of this area.</p> <p>Additionally, it will have the effect of getting the local populace to first appreciate the area and</p>	ERA acknowledges receipt of your email.

		<p>then look after it or at least refrain from damaging it further</p> <p>At this time, the place is treated as a derelict area. With such a development, it will be treated as actual 'property' with a very apparent value. I gather that the re-development seeks to introduce the concept of environmental husbandry and protection. This can be a prime example for similar developments in other rural areas. This example cannot be set by the developments in other densely populated areas such as Sliema and St. Julians and therefore this will be a golden opportunity for all the stakeholders to show that such environmentally sensitive projects may be undertaken and be of universal benefit to all stakeholders.</p> <p>Thank you for offering the opportunity of engaging with you and</p>	
5	<p>Member of public</p> <p>Email dated 14 June 2016</p>	<p>To whom it may concern:</p> <p>When considering the present state of this site and the lack of facilities and tourist accommodation in the south of Malta, one cannot but be in favour of such development. Obviously one needs to respect the environment and scenery surrounding the proposed development yet a proper scheme will only complement future embellishments. The proposed beach facilities are greatly needed at Kalanka Bay and will surely minimise the environmental impacts which are presently polluting such a pristine location. I think this proposal is quite balanced since the developer has also considered sufficient renewable sources for energy production. Another positive aspect is that finally the area will be manned, maintained and above all surveilled from illegalities.</p>	ERA acknowledges receipt of your email.
6	<p>Member of public</p> <p>Email dated 14 June 2016</p>	<p>After reviewing the application of Delimara Hotel, I feel that it is a great idea to finally develop this area, thus eliminating such hideous building with an ecological structure, improving and enhancing the environment as it will be taken care of and bringing more attraction to the site amongst the locals and tourists, making it more accessible and comfortable with the added facilities to the general public.</p>	ERA acknowledges receipt of your email.
7	<p>Member of public</p>	<p>To whom it may concern,</p>	ERA acknowledges

	Email dated 14 June 2016	<p>Project: TRK 163702 (EA 00007/16) - Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities; At, Ta' Kalanka, Delimara.</p> <p>As regards to the above project, I fully agree with the proposed development since it will give to the general public the much needed beach facilities at Kalanka bay. It's about time that we focus more and give good projects to the South of Malta.</p>	receipt of your email.
8	Member of public Email dated 14 June 2016	<p>I am writing on the subject re the redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities at kalanka bay delimara. I am a frequent visitor of delimara and surrounding areas since I come from the near by village of Zabbar and have always questioned why such a beautiful property remained in such a shameful state. locals can testify that it has been neglected for ages, yet when it was still operative it was an attraction to both locals and tourists alike, it was a landmark where one could find refreshments and a snack, public convenience and also the owners use to take care of the general up keep of the area. The concept of an ecological accommodation blends well with the surrounding landscape and if planned properly it will be the first of its kind. I happen to know the person involved in its development Mr Kenneth Abela and I can vouch that he has the environment agenda really at his heart so no wonder he came up with an ecological concept and that will surely respect the surrounding landscape. a very positive consideration is of the creation of public ancillary facilities such as toilets, showers etc, these will surely facilitate the process of having Kalanka Bay as the first blue flagged Beach in the south of Malta accompanied with an accessible for all link.</p> <p>On this premise I would like you to note my support and agreement with this initiative and hope it will materialise in a short time.</p>	ERA acknowledges receipt of your email.
9	Member of public Email dated 14 June 2016	I write to you regarding the subject above. For years we have been hearing the same rhetoric that the south of Malta has become the most neglected area and dumped with the heaviest	ERA acknowledges receipt of your email.

		<p>industries on the island. This is a fact which unless addressed would remain unchanged. There is a good possibility that a very well sought after area in the south could be rehabilitated to become unique area for recreational purposes. The derelict building is already there as has been for the past 50 years or so and the only possibility I see is that it either remains so, or have it rebuilt with better solutions to reflect today's reality with the public's interest into consideration. In my humble opinion such a development would only enhance the area by having someone with a vested interest that the area remains fit for the purpose of the development which in itself is proposing an environmentally considerate proposal and also to best serve the public in the area. Could anyone imagine how in 2016 this area does not provide a public convenience? Where and how do all the people frequenting the area relieve themselves? Are we after having the area being left abandoned for illegal hunting and a safe haven for drug users?</p> <p>The environment is very important subject to be safeguarded, but the right of the individual citizen and the general public have also a bearing weight to be considered.</p> <p>The development of this project has no other impact other than a positive one for everyone including the tourism industry which till this date has always kept away or retreated from the area.</p>	
10	<p>Member of public</p> <p>Email dated 18 June 2017</p>	<p>I am submitting my comments following the public invitation for comments, published on the Sunday Times of Malta dated 5th June 2016, in relation to the Environmental Impact Assessment for the 'Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities' at Ta' Kalank, Delimara, Marsaxlokk.</p> <p>The terms of reference which shall be included in the Environmental Impact Assessment shall take into consideration that the increased built-up area and building heights would have a significant impact on the landscape of the site. I strongly recommend that the Environmental Impact Assessment will include:</p> <p><input type="checkbox"/> The extent to which the site, which is located in a highly sensitive environment and protected</p>	<p>ERA acknowledges receipt of your email.</p>

		<p>area, will be affected by increased built-up area and heights;</p> <p><input type="checkbox"/> The extent to which the proposed development will affect the natural and ecological qualities of the site and how its surroundings will be protected given that the site is scheduled as an area of high landscape protection in the Strategic Plan for the Environment and Development;</p> <p><input type="checkbox"/> The extent to which other ancillary developments will affect the environmental surroundings including the public beach area;</p> <p><input type="checkbox"/> Whether public beach area will be taken up by the proposal of 'public beach facilities'. I strongly recommend that any public beach area remains untouched for the public enjoyment of many, including all shoreline. Apart from being taken up unjustly from the public any beach facilities will definitely have an impact on the bay and its sensitive environment;</p> <p><input type="checkbox"/> Whether public access remains untouched as follows (reference is made to the attached document with this email):</p> <ul style="list-style-type: none"> o Point A – Access to Triq il-Ponta tat-Tawwalija; o Point B to D – Access to the stairs which lead up the Ta' Kalanka beach from Triq il-Ponta tat-Tawwalija; and o Point C – Access to the stairs which lead up to the Ta' Kalanka beach from the parking area in front of the proposed development. <p>I strongly recommend that the Environment and Resources Authority takes into consideration all of the above and does its utmost to protect one of the remaining untouched spots on the island and a landmark for thousands of tourists.</p>	
11	<p>Member of public</p> <p>Email dated 22 June 2016</p>	<p>To whom it may concern</p> <p>Living in the South of Malta for the last 45 years, I have been made aware of an application of for the development of Delimara / Kalanka bay.</p> <p>I have to say that I am in agreement with the proposed development since it will give the general public the much needed beach facilities at Kalanka bay. Currently there is no decent beach for swimming purposes to be found in the South.</p> <p>This area has been neglected for years and the development and upgrade of such would be of</p>	<p>ERA acknowledges receipt of your email.</p>

		great benefit not only to the general public but also from an environmental perspective and an economic one.	
12	Member of public Email dated 24 June 2016	Jien nzur il kalanka kull sajf, niftakar il lukanda miftuha u vera kienet sabiha u ta kumdita ghal min jkun f'dawk l-inhawi. Kien hemm toilets u showers ghal min kien jkun il bahar. Ir restaurant kien jservi ikel malti u kienu jigu hafna familji fi zmien il fest jgawdu ix-xalati hemm. Niftakar wara li ghalqet il post spicca mitluq u jintuza ghal abbuzi, hasra post bhall dak baqa zdingat hekk. Xhin smajt li ha terga tiftah kont kuntent li wara dawn is snin kollha, dan il post rega sab xortieh u flahhar ha jerga jkollna fejn ngawdu il bahar u l-kumdita ta toilets u fejn wiehed jista jiekol u jixtri xi affarijiet bazici. Naqbel ma dan l-izvilupp	ERA acknowledges receipt of your email.
13	Member of public Email dated 24 June 2016	Have been frequenting the kalanka bay area for quite a long time and always wondered how on earth can such a beautiful building be left to deteriorate in such a state. Finally someone brave enough has taken the initiative and invest in upgrading the area. Lets support similar initiatives that respect the environment and respect human beings.... Hope the idea of beach facilities goes through, ERA should find a balance as to permit this development and also safeguard the area. Having someone having a vested interest in keeping the area well kept is a very positive way forward. Good luck!	ERA acknowledges receipt of your email.
14	Member of public Email dated 24 June 2016	To whom it may concern, I would like to show my appreciation towards the planning of developing Kalanka bay hotel and the surrounding beach areas in Delimara. it has been long left unattended becoming an unwelcoming area. Any beach goers lack sanitary facilities incurring a problems to the rest of the beach commuters and most of all the environment, along with garbage problems in the whole area. I hope that the hotel is also part of the project since the current rundown hotel is an eye sore and a mecca for indecent activities. looking forward to attending the Kalanka beach more often	ERA acknowledges receipt of your email.
15	Member of public	RE: Subject: TRK 163702 (EA 00007/16) <i>Development of an existing derelict hotel including environmentally friendly measures and</i>	ERA acknowledges

	Email dated 24 June 2016	<p><i>provision of public ancillary facilities. At, Ta' Kalanka, Delimara</i></p> <p>I am writing to you to show my support and appreciation for the above mentioned project. The crumbling and derelict remains of what once a small hotel is not only an eyesore, ruining one of the most scenic spots in the South of the Island, but also, for scores of years have served as some kind of a refuge for drug abusers and other criminal activities.</p> <p>It is self-evident that the project for developing a new and quaint boutique hotel on an abandoned rat-infested site will serve as a boon to enhance the splendour of this natural beauty spot. Besides helping developing the tourist potential of the Southern region, it will make accessible to the general public coastline and waters which up to now could be enjoyed by a few who relish the life of adventure.</p> <p>I am sure that I am speaking for the majority of the people of the South when I recommend the acceptance of such a environmentally-friendly project.</p>	receipt of your email.
16	<p>Member of public</p> <p>Email dated 25 June 2016</p>	<p>To whom it may concern</p> <p>Re: Subject TRK 163702 (EA 00007/16) Redevelopment of an existing derelict hotel including environmentally friendly measures and provisions of public ancillary facilities; At Ta' Kalanka, Delimara.</p> <p>We are happy that at long last, such an ugly de-lapidated building is to be replaced by a hotel. We consider ourselves as friends of our natural environment, and so we can never understand the reasons why this decaying and dangerous hotel cannot be replaced by a modern one which besides complementing the intrinsic beauty of its natural environment, will for the first time ever, make the rugged, majestic coastline down below, fully accessible to the general public.</p> <p>On top of this, we are of the opinion, that the new hotel will foster much needed economic growth to the locals of the area. We notice, and with a heavy heart remark taht since the closing down of the Jerma Palace Hotel in Marsascala, the</p>	ERA acknowledges receipt of your email.

		<p>entire South has been left bereft of any hotel which serves as a tourist attraction.</p> <p>We are certain that you will consider all these factors in your deliberations.</p>	
17	<p>Member of public</p> <p>Email dated 26 June 2016</p>	<p>Lil Mittenti</p> <p>Jider car li dan huwa zvilupp sustenibli u min qed jiproponih zamm fmohhu l ambjentu l ekologija tal madwar. Jien nhobb hafna in natura u sikwiet nsiefer ghal vakanzi eco, l ahhar akkomodazzjoni li kont fija kinet tixbah ezatt dan propost fil Kalanka ta delimara, probabli min qed japlika jew mar xi post simili jew tahh oparir simili.</p> <p>Progetti bhal dawn jghinu direttament kemm li nies jsiru konxji aktar tal gmiel naturali peress li jekk ikun hemm facilitajiet, il post ikun aktar accessibli , kif ukoll jkun hemm management tal inhawi ahjar.</p> <p>Illum hemm telqau tifrik kbir. Bi ftit ghajnuna nahseb li dan il post jkun gojjel fin nofsinar ta Malta u ghalehekk niextiq narah isehh.</p>	<p>ERA acknowledges receipt of your email.</p>
18	<p>Member of public</p> <p>Email dated 26 June 2016</p>	<p>Inhobb nifrekwenta iz zona ta Kalanka Bay kemm fil jiem tax Xitwa kif ukoll fil granet tas Sajf. Sfortunatament, prezentament dan il post qiegħed fis stat ta abandon. Progett bhal dan jagħmel gid mhux biss lit turizmu izda anka ghalina il Maltin jkun accessibl iktar. Fin nofsinhar ta Malta, għandna nuqqas kbir ta progetti bhal dawn u cert li b naqra sforz dan il post jista jkun wiehed mil-isbah postijiet li għandna f Malta. Għalhekk naqbel li terga tinfetħ dik il-lukanda kif ukoll il-facilitajiet għal publiku proposti.</p>	<p>ERA acknowledges receipt of your email.</p>

Appendix II: Comments received by ERA during the EIA Review (From 27 January 2017 to 27 February 2017)

A. Malta Resources Authority (Email dated 27 January 2017)

Comments	EIA Coordinator response	ERA comments
<p>The Malta Resources Authority notes that the EPS makes reference to the drilling of two boreholes that apparently reached into the saturated zone without the necessary permits as required in terms of the Borehole drilling and excavation works within the saturated zone regulations (SL423.32). As such, the authority cannot issue a no objection until the position of the applicant with respect to these boreholes is clarified and, if necessarily, regularized.</p> <p>If the proposed development includes excavation works that reach partially or totally within the saturated zone, or any proposals for water abstraction, then the developer should submit an application in writing to the MRA including the details specified in regulation 5(1) of the Borehole drilling and excavation works within the saturated zone regulations (SL423.32), together with a technical study showing that there will not be a significant impact on water resources; that water resources will be used efficiently in the course of any activities carried out; and that the water environment is protected including the limitation of discharges to the environment.</p> <p>This assessment is based primarily on the documentation that was published on the weblink provided as on the date of the assessment. The Authority made its assessment on a good faith basis and reserves the right to review its position and, or to take action against the authors of the documentation and, or the applicant if information relevant to its assessment (particularly the prior use of the site where the development is proposed) is 'buried' or concealed (including through the submission of documentation that is not text searchable).</p> <p>This, and any other response in writing by the MRA to the application submitted for consultation or to any other documentation, should not in any way be deemed as approving or endorsing this application in any form or of condoning any matter that falls beyond the MRA's immediate remit as established under the Malta Resources Authority Act and as in force on the date of the relevant response. In particular, you are reminded that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of</p>	<p>Drilling did not occur below the mean sea water level, which is referred to as the saturated zone by MRA. The deepest borehole was 10.50m and the MSWL is at about 14-15m. Therefore, no permit was required from MRA.</p> <p>The excavation will also not go into the saturated zone. A permit will be required for the borehole that will be drilled for the geo-thermal system.</p>	<p>Noted.</p>

Groundwater against Pollution and Deterioration Regulations have been excluded from the remit of Malta Resources Authority and as such the MRA has no authority to take a position on matters regulated by these regulations or indeed any other matter that does not fall within its remit. While this response may be published, any response by the MRA may not be publicly used or mentioned as a general or partial approval by the MRA of the matter referred to for consultation.		
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B. Transport Malta (Email dated 27 January 2017)

Comments	EIA Coordinator response	ERA comments
Transport Malta has no objection to the EPS being made public.	Noted.	Noted.

C. Regulator for Energy and Water Services (Email dated 14 February 2017)

Comments	EIA Coordinator response	ERA comments
The Regulator for Energy and Water Services has no comments regarding this proposal.	Noted.	Noted.

D. Environmental Health Directorate (Email dated 22 February 2017)

Comments	EIA Coordinator response	ERA comments
<p>With reference to your e-mail dated 27 January 2017 regarding subject indicated in caption and following review of the 1st Draft of the Environmental Planning Statement, please be informed that this Directorate would like to submit the following comments/recommendations regarding this proposal :</p> <p>Applicant is to adopt best practice methods together with good site practices and ensure compliance with Environmental Management Construction Site Regulations during the demolition, site clearance, excavation and construction phase so as to cause least nuisance and address adverse air (from dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors (especially on residential and recreational receptors) in the Area of Influence. Effective and continuous noise, vibration and dust control measures during all the phases of the</p>	Noted.	Noted.

construction works is of utmost importance to mitigate adverse impacts (which are likely to span the entire construction period) on nearby receptors. The proposal that timing of works excludes the summer season is highly recommended to mitigate adverse construction impacts (including on the bathing water which although not considered as one of the official bathing sites the coastal area is sought for swimming), nuisances and complaints. Hence the importance of drawing up and implementation of a Construction Management Plan to ensure adherence to proper site management practices, to mitigate adverse construction impacts and to ensure safety measures. Monitoring of construction works especially the proposed noise monitoring 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.

Adequate measures should be taken so as to prevent 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 which are to be well managed and adequately stored.

It is also pertinent that storm water runoff be carefully managed and properly channelled and that adequate measures are taken to ensure that no water from water dousing regimes, from wheel wash facilities and any general cleaning runs off the site.

A waste management strategy should be adopted and strictly implemented 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 waste, adherence to regulatory codes and procedures and due diligence is important in view of any adverse impacts on sensitive receptors.

Generated wastes, cleaning chemicals, etc from any temporary sanitary facilities for on-site workers should be properly disposed of. Moreover all water for human consumption and personal hygiene including that of any showers at said facilities is to be adequate and potable and preferably from the Water Utility Supply i.e. Water Services Corporation.

It is recommended that construction traffic follows established specific routes and adequate measures (such as covering of all trucks leaving site with proper tarpaulin sheets) are taken to mitigate adverse dust impacts and nuisances

from HGVs during transportation of construction material.

Pest control management on site and at the surrounding areas especially regarding rodents which could be an issue during the demolition, excavation and construction phase should also be taken into consideration.

Rain water/surface water proposed to be collected in reservoirs and recycled waste water should not be used for human consumption and/or for personal hygiene. All water used for human consumption and/or for personal hygiene is to be adequate and potable and preferably from the Water Utility Supply i.e. Water Services Corporation. The reverse osmosis plant proposed to supply the Scheme with potable water should be duly registered with the Superintendent of Public Health.

Applicant is also requested to carry out specific discussions with the Environmental Health Directorate regarding the proposed bar and restaurant, spa and pool, any water features and other proposed facilities (such as cooling systems, R.O. plants, etc.) in view of specific regulations under the Food Safety Act and the Public Health Act. Spa and pool should be duly registered with the Superintendent of Public Health.

Proposed cesspit should also to be duly registered with the Superintendent of Public Health.

It is recommended that all proposed mitigation measures regarding adverse impacts arising from this development be strictly implemented by applicant to mitigate significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and the general public. The possible health effects of any residual impacts that cannot be mitigated and cumulative impacts should also be taken into consideration. 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.

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.

E. BirdLife Malta (Email dated 27 February 2017)

Comments	EIA Coordinator response	ERA comments
<p>As a reaction on the Environmental Planning Statement of the proposed development PA 02767/16 "Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities" in Ta' Kalanka, Delimara, BirdLife Malta would like to submit the following comments:</p> <p>1. <i>The development does not contribute to conserve, protect or improve the natural heritage of the area and is breaching several policies which are listed in chapter 4. The mitigation measures in the EPS to avoid destruction and disturbances of the surrounding habitat, particularly caused during construction and operation is insufficient.</i></p> <p>2. The development site covers an area of approximately 3,646sq m including landscaped areas, however, the current buildings' footprint covers an area of approximately 343sq m. The replacement buildings should not exceed the total floor area of the previous buildings as per the Rural Policy and Design Guidance, 2014, part 6. The building area is set to increase from 343sqm to 561sqm., and accordingly shall fall short of such guidance. <i>This is against the national policy frameworks and should disqualify the planning application. It appears that the conditions that would allow this development to be allowed in an ODZ area are not met, and accordingly these development plans do not qualify for the granting of a permit. This point is not mentioned in the EPS.</i></p> <p>3. As stated correctly, Policy MD01 of the SPED designates Delimara Peninsula as the Delimara National Park. Hence, in accordance with Structure Plan Policy RCO14, the greater part of the Delimara Peninsula, as defined on the Policy Map, will be designated as a national park where priority will be given to conservation, protection and improvement of the natural heritage. In this location, positive provision will also be made for</p>	<p>1. Noted. Residual impacts have all been identified in the EPS.</p> <p>2. The EPS identifies all relevant policies and acknowledges that the Scheme involves the redevelopment of an existing building that will, however, have a larger footprint and will also include a pool. The impact assessment takes into consideration the potential impacts arising from this proposal. The EIA does not evaluate acceptability; its role is to provide detailed information for an informed decision by the Competent Authorities; it is up to the ERA and PA to consider the implications of policy and whether this is acceptable or otherwise.</p> <p>3. The study carried out as part of the first draft of the EPS was in fact thorough and extensive in that it included a wide Area of Influence throughout which habitats were identified, described in terms of ecological importance and evaluated in terms of conservation status. It is noted that the timing of the survey work was not ideal; nonetheless, it is still possible to map overall habitats and obtain a picture of their structure and function based</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. ADI response and Wet Season Survey are noted.</p>

recreational uses consistent with this objective. Limited commercial development related to the needs of park users will be considered. Other uses likely to have a harmful or conflicting impact will be refused.

In chapter 6.23 of the EPS, the survey of the habitat status identifies that the entire area of the Delimara Peninsula is in a poor conservation status. Consequently, the area has suffered from severe habitat degradation already which has to be properly addressed by the respective governmental authority. Developing a hotel complex and thereby increasing human activity to a great extent will lead to further degradation. This breaches several national policies (including SPED, MD0I Delimara National Park, and Rural Policy and Design Guidance) and destroys the already endangered Maltese natural habitat.

The above conclusion concerning the conservation status of the area, cannot however be taken seriously given that the ecology baseline survey for the area has been undertaken in August 2016. As both the consultant and ERA should know, August is not the right time to conduct such surveys given the seasonal nature of some flora, which with a survey undertaken in the midst of summer would have not even be recorded. The impact on the ecology as a result of this development is therefore inconclusive at this stage, up until both ERA and the consultants can assure with certainty what sensitive receptors may occur within this Area of Ecological Importance.

Statements such as 6.17 *In view of the above, this habitat is considered to have limited ecological value and is recorded throughout its extent as having a poor habitat quality*, appear to be none more than speculative with respect to the limited studies undertaken.

ERA is obliged to safeguard and protect these areas/sites and therefore has to ensure that the proposed development meets the relevant environmental assessment criteria prior to taking decisions on this development.

4. It is stated correctly, that “the construction phase of the project will lead to the loss of all the habitats found on the scheme site” (p. 114), however,

on key indicator species, which may or may not be flowering during the dry season, but for which vegetative material would in most cases remain and be identifiable. A wet season survey would, however, provide a more robust picture and would include a fuller species list, allowing for the improved understanding of the species diversity within each habitat. To this end, Adi Associates together with botanist Mr Edwin Lanfranco revisited the habitats of interest in the vicinity of the hotel in March 2017. Refer to **Appendix 7** of this Addendum. The survey revealed a number of species not previously identified within the delineated habitats. As identified in the report, the presence of these additional species recorded in March 2017 does not affect the overall conclusions of the habitat evaluation undertaken in the dry season. Conservation status refers to the extent of area, structure and function, and future prospects of these aspects. Far from being speculative, as described above and indicated in the report, structure was classified as poor due to the abundance of alien species and a lack of a dominant phytosociological association that is typical of coastal areas. It is important to understand the habitat evaluation conclusions in the entire context i.e. (in this case) see paragraphs 6.14 – 6.18 for an explanation of how conclusions were reached.

4. It is reiterated that the report should be reviewed in its entirety in order to ensure correct understanding of what is being stated. The paragraph referred to

4. Noted.

<p>the statement goes on with “the site was identified as being of low ecological value and mostly composed of ruderals and alien species. The impact is therefore considered to be not significant.” This is a wrong conclusion due to the fact that the development lies within two Areas of Ecological Importance (AEI) and in the direct surrounding of a Site of Scientific Importance (SSI), and an Area of High Landscape Value (AHLV). Furthermore, in the non-technical summary it is stated (p.10), that educating guests on the importance of avoiding trampling of sensitive habitats and general disturbance to the natural areas around the Scheme Site should serve as mitigation measures to address habitat destruction caused by future hotel guests. <i>AEI’s, SSI’s and AHLV’s require protection from developments because of their considerable ecological and scientific values.</i> As highlighted in point 3 above, the consultants cannot reach any conclusion on the impact on ecology from the proposed development, given the limitations of the ecological study undertaken.</p>	<p>is one small part of the section entitled ‘Prediction and Significance of Impacts’. The reviewer is referred also to the baseline findings. Refer to the habitat map Figure 6.3 which summarises these findings including describing habitat quality. Paragraphs 6.43-6.50 describe the impact assessment which assesses impacts on all the habitats identified within the Area of Influence and these are further summarised in Table 6.5. The reviewer will note that whilst the impact on the site itself (i.e. the application footprint) was not identified to be significant from an ecological point of view, potential impacts were identified on habitats in the vicinity of the site including on habitats 1240/1420 and 8210. Thus, whilst it is acknowledged in the EIA too that the site is an AEI, the purpose of the ecological study was to study the A of I in more detail to pinpoint those areas within the A of I that are at risk as a result of the development. Potential mitigation measures were also identified. All this is summarised in the non-technical summary.</p>	
<p>5. Section 6.44 and other sections mention the possible impact on habitats and flora as a result of dust generation. No appropriate mitigation measures are however suggested other than simply stating that this might be a temporary impact. The EPS should delve into what dust containing measures are to be considered by the developer (and enforced as permit conditions) given the development is within an AEI. Timing of construction is essential to ensure dust generation has no widespread impact.</p>	<p>5. This statement is incorrect. The EIA does include a list of mitigation measures in the section entitled ‘Mitigation’ which follows the section on impact assessment. Mitigation measures are also summarised in Table 6.5. The list does include addressing dust arising from the construction phase. The mitigation proposed should always reflect the significance of the impact predicted, its duration, whether it is temporary or not, etc, as required as part of good practice and in accordance with ERA’s Terms of Reference.</p>	<p>5. Noted</p>
<p>6. Chapter 6 mentions in various parts the presence of the endemic <i>Salsola melitensis</i>, which is a plant which has a good population around the Delimara peninsula. The EPS does not clearly</p>	<p>6. Refer to paragraph 6.33. The site does include <i>Salsola melitensis</i>, it grows on rubble walls that will be maintained or rearranged as required. Comment regarding landscaping is noted also in light of ERA comments above.</p>	<p>6. Noted.</p>

highlight however if such an endemic is present within the site proposed for construction. This needs to be ascertained.

In relation to this, it has to be noted that the landscaping plan presented in Figure 3.20 omits this species which is typical of the area, yet introduces other plants such as *Hedera helix* which are not typical of the surroundings and probably will also not thrive in the coastal conditions.

7. The development may introduce excessive lighting during the constructions and operational phase, bringing light to an area which is otherwise not provided with any street lighting. The impact of the development in relation to contributing to sky glow in relation or addition to other major developments in the area needs to be carefully assessed, especially with regards to the impact of certain wildlife such as seabirds which are sensitive to coastal light pollution. *Furthermore to the light management approach pointed out on page 28 it is important to not only install dim and switch lights but rather to adjust the direction of the light beam to shine onto the ground and not in the direction of the coast and cliffs.*

8. In relation to point 5 above as well as the predicted noise generation from the development, the EPS does not delve much into what ERA should consider as mitigation during the operational phase of the development. The development concerns a hotel situated within a national park and an area of ecological importance. There is a real risk that the hotel, for its operational reasons, operates lighting and noise, perceivable to the exterior of the hotel during the night. The EPS mentions that regulations require the cessation of noise until 23:00. Unless any conditions are imposed via an operational permit for the hotel, these conditions will simply in the long run be dismissed, and the hotel during its operational phase, will cause detrimental noise and

Appendix 2 includes an updated landscaping scheme.

7. Potential impacts from light pollution on fauna have been discussed in **Chapter 6**. As described by the site engineer, all the lighting proposed for the external walking paths are only for floor indication with low power and low luminance. All selected light fittings are of very low power consumption/efficient systems (LED) type and also have a very low luminance. This will contribute towards reduction in CO2 emissions when lighting up the site and also contribute towards reduction in light pollution. All light fittings will include a top cover (as part of the design so that the light will be reflected to the ground). Hence the light fittings will not transmit light to the ambient but the light will be absorbed by the ground providing just enough luminance for safely walking towards or around the hotel.

8. The EIA includes mitigation measures and also describes residual impacts, which, the EIA notes, may remain and could (in the case of noise during operation) range from between not significant to being of minor or moderate significance. The role of the EIA is to identify potential significant impacts and also identify potential mitigation measures. It is, however, sometimes not possible to mitigate all impacts. The EIA must also identify residual impacts, which are those impacts that may remain despite mitigation measures. The decision-making body must then take an informed decision which includes taking into consideration the findings of the EIA.

7. Noted.

8. Noted.

<p>lighting which will invariably and undoubtedly diminish the ecological value of the site and its surrounding.</p> <p>9. The statement (p. 60)“The Scheme will not result in a significant growth in vehicular traffic, either during the construction phase or when it comes into operation; hence, there will be no significant impact on air quality (particularly PM10 and NO2)” can be evaluated as incorrect. Traffic will increase both, during construction and operation of the project, including heavy-vehicle traffic and traffic due to visitors to the area. <i>This will cause negative impacts on air quality and will limit the availability of public space. Additional parking demand will be caused by the development, resulting in an impact on surrounding land, particularly if parking is poorly managed and illegal parking along the road increases. This is very likely if the beach facilities will be developed adjacent to the hotel complex.</i></p> <p>The cumulative impact section of the EPS marginally suggests that this impact may occur, yet no mitigation measures are being proposed. The provision of transport is commended and may indeed help alleviate the parking problem, however, the development will likely increase the amenity use of the beach and therefore increase parking pressure. As long as this is available in off-road areas or in make-shift car parks (as has been the case with an illegal car park operated in the vicinity at St Peter’s Pool during summer 2016), such measures will simply not work.</p> <p>10. <i>We fully support the recommendation to omit the tunnel and related beach facilities from the Scheme (p. 90).</i></p> <p>11. The national power plant facility is in the immediate surrounding of the proposed development. Emissions and noise resulting from the power plant might have an impact on hotel users which needs to be considered. <i>This point has not been addressed in the EPS.</i></p>	<p>9. This statement is not speculative but is based on the findings of a Simplified Traffic Statement (STS) that was carried out for the proposed development. The STS identified that the Annual Average Daily Traffic (AADT) as a result of the Scheme will be an additional 131 vehicles– this is considered to be insignificant by ERA. A proposed development will need to generate at least an additional 1,000 vehicles before ERA considers that there could be a significant impact on air quality.</p> <p>Construction traffic will be controlled through the implementation of a Construction Management Plan to be approved by the PA.</p> <p>Illegal parking is a matter for enforcement by the relevant public authorities and not attributable to the proposed development.</p> <p>10. Noted.</p> <p>11. The scope of the EIA is to assess potential impacts arising from the proposed development. Impacts from other activities not associated with the development, and the hotel residents (who are not considered to be sensitive receptors) fall outside the scope of the EIA.</p>	<p>9. Noted.</p> <p>10. Noted.</p> <p>11. Noted.</p>
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Comments	EIA Coordinator response	ERA comments
<p>1. Nature Trust is against the re-development of this area into a hotel for reasons mentioned in the points below. Besides this is an ODZ and having a hotel in a rural area and according to existing policies, such development is unacceptable. This application is in conflict with the SPED National Spatial Framework. Alternative sites should have been considered WITHIN the built areas and not ODZ. The alternative described on page 12 (3.18) that the landowner would consider developing the land into a residence should be considered ONLY if the current footprint is significantly reduced, the area is well landscaped and the building is masked. This would be the lesser of two evils, given that the RPG do not unfortunately give the option of ecological restoration and total removal of existing structures which by existing laws are illegal.</p> <p>2. The built up area will increase from 343 m2 to 561 m2.</p> <p>i. Pg 50 explains the use of sea-water for the geo-thermal system. Mention is also of the rejected RO water though a borehole. Would such water be treated? Would there be additional chemicals added to the sea water? If yes then the necessary precautions must be taken.</p> <p>ii. Again – ecological studies were carried out in SUMMER (August 2016) pg 101. This is unacceptable as winter plants are being missed. This was already pointed out by Nature Trust before. NTM insists that a winter vegetation survey be done as soon as possible.</p> <p>iii. The design of the hotel is in conflict with the surrounding (pg 160, 163, 167 confirms this as having a major landscape impact) and stringent efforts should be made by the developer to make it less alien to the rural surroundings by lowering the height and making it more</p>	<p>1. Noted.</p> <p>2.</p> <p>i. Reject water from RO is brine. Chlorinators will be used for the pool water. This technology uses the salt to generate chlorine to treat the water passing through the system. An ionization copper treatment will be used as an effective algacide and to control bacteria.</p> <p>ii. A wet season survey of the habitats of conservation interest in the vicinity of the hotel was carried out by Adi Associates and Mr Edwin Lanfranco. The report of this survey is included in Appendix 7.</p> <p>iii. Noted.</p>	<p>1. Noted</p> <p>2.</p> <p>i. Noted.</p> <p>ii. The Wet Season Survey is noted.</p> <p>iii. Noted.</p>

contoured. The introduction of vertical green walls is highly recommended - using local indigenous species.		
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Appendix III: Comments received by ERA during the EIA Certification stage (Public Consultation - from 22 June 2017 to 13 July 2017)

A. BirdLife Malta (Email dated 12 July 2017)

Comments	EIA Coordinator response	ERA comments
<p>As a reaction on the new public consultation for development PA02767/16 "Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities" in Ta' Kalanka, Delimara, BirdLife Malta notes the responses made by the EIA consultants to our previous two rounds of comments (Comments on EPS dated February 2017; Comments on PDS dated June 2016).</p> <p>We would however still like to highlight the following concerns, also further to the revisions made to the Certified Environmental Statement/EPS as follows.</p> <p>1. The proposed hotel development is located within ODZ and exceeds the footprint of the existing building on site which is being redeveloped. This is in breach of ODZ policies. We understand that the EPS has considered the impacts of the proposed footprint, however this does not change the fact that the proposed development goes against set policies. ERA and PA have the responsibility to consider such in their decision making process.</p> <p>2. In our original submission, we have highlighted that the development is in breach of SPED and Policy MD01 which designates the area as the Delimara National Park. The answers provided in this regard, do not justify the fact that these policies will be breached. Furthermore we do not agree with the consultants' conclusions that disturbance and damage to habitats and wildlife are evaluated as "minor" under the condition of good construction practices and monitoring of works. Even if such was the situation, this again does</p>	<p>1. Noted. Comment for the Planning Authority</p> <p>2. The EIA does not attempt to justify the proposal from either a policy point of view or through the assessment . As has already been stated, and as BirdLife is aware, EIA is a tool (carried out independently) that seeks to inform the decision-maker of the significance of relevant potential environmental impacts that may arise from the development if it is granted planning permission. The impact</p>	<p>1. Noted</p> <p>2. Noted.</p>

not justify these policies being breached.

We consider the mitigation measures proposed in this regard as insufficient due to (1) imprecise description of measures and how these will be enforced, and (2) due to the fact that habitat impacts will continue during the operational phase of the development due to increased human interaction from hotel guests and beach facility users.

assessment is carried out as objectively and transparently as possible, including the definition and application of assessment criteria. It is also important that the term 'minor' is interpreted in its correct context. The reviewer should regularly refer back to the definition of an impact of 'minor' or 'major' significance in the context of ecological assessment when reviewing the assessment. Moreover, potential major impacts on ecology were identified in the assessment including disturbance / damage to wildlife and escape of species used in landscaping. Mitigation measures were identified that, if implemented correctly, could reduce the significance of certain impacts identified. Of course, if mitigation measures are not effectively implemented, there is a risk that the residual impact will be greater. Thus, the use of the term 'minor' does not suggest that there will be no impacts as seems to be the way BirdLife is interpreting the assessment. With regards to the alleged imprecision of the measures to be enforced to potentially reduce impacts, the EIA has made a distinction between impacts during construction and those that may arise during operation. Again, the entire context of the assessment must be considered. Thus, the assessment of impacts has made a distinction between the construction phase (temporary) and the operational phase (on-going following

<p>3. The impacts on the ecological value of the area are described as potentially causing a significant impact, (termed as likely and major for habitats of conservation significance) during both the construction and operational phase of the development. We do not agree that should the mitigation measures proposed be enacted, the residual impact can be concluded as being minor. The mitigation measures proposed rely solely on good practice (for which similar developments demonstrate this is not achievable), and in reality there is little that can be mitigated from the impacts related to increased visitors to the areas as a result of the development.</p> <p>4. We have also highlighted in a previous version the likely impacts associated from dust emissions. These are not addressed adequately in the revised version of the EPS, and the consultant should at the very least suggest how to minimise such an impact. In the absence of such recommendations, the impact from this activity will be a reality affecting both the ecological value of the site and other receptors. The mitigations measures are insufficient and too general.</p>	<p>construction). The level of detail provided for measures proposed is appropriate to the EIA. Implementation of specific mitigation measures during the construction phase will be further elaborated upon in eventual Works Method Statements and CMP, if the permit is approved.</p> <p>3. The EIA assumes that mitigation measures will be implemented through permit conditions and that these are enforced. This is done through the planning process wherein ERA provides detailed conditions to the Planning Authority arising from its own review of the EIA. The safeguard of important habitats is ERA's responsibility and enforcement of any conditions it imposes should be undertaken. Given the scale of the development and following the assessment, should the mitigation measures be implemented as recommended in the EPS, the residual impact is considered to be minor (in line with the assessment criteria defined).</p> <p>4. To reiterate, mitigation measures aimed at reducing any potential impacts arising from dust are included in the EPS. More detailed mitigation measures are generally developed through the CMP and during permitting and can include measures such as covering dust heaps, use of misters during excavation, minimising drop heights, and covering loads in HGVs. More detailed measures can be included depending on the</p>	<p>3. Noted.</p> <p>4. Noted.</p>
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<p>5. Regarding the possible noise impact, if it cannot be guaranteed that any mitigation measures can address such a concern, we advise that this impact is termed as being a significant one and is included as a predicted impact in the summary of impacts in the EPS. This should be a criterion which should not be dismissed in the decision making process, and should be included in the summary of residual impacts.</p> <p>6. Regarding traffic impact, the fact that the development may generate less than 1,000 vehicles does not merit the competent authorities to dismiss this as a possible impact. The hotel is a development that will generate traffic during its construction and operational phases, and might possibly result in furthermore traffic due to the fact that the services the hotel provides will attract non-residents to the area. The Simplified Traffic Statement is not included in the EPS, and there is no indication whether ERA and PA have actually reviewed this in details. Such an analysis should be made public to comment upon accordingly. Whether an extra 131 vehicles will cause significant additional air pollution to the area, is just one of many impacts associated with increased traffic to the area.</p> <p>7. In the original PDS, it is pointed out that a number of small structures that appear to be used by hunters are located within the area. The EPS does not properly address these hunting activities. To guarantee efforts of conservation and protection and improvement of the natural heritage in the region, existing hunting structures would</p>	<p>equipment to be used, time of year, etc. As stated above, through the review of the EPS ERA will include conditions to sufficiently address impacts from the development. These conditions usually include a monitoring requirement which would address dust mitigation in detail.</p> <p>5. The EPS does include noise impacts in its summary of impacts (see Table 10.1) and also identifies the potential for significant residual impacts (see paragraphs 10.17 and 10.18 as well as Chapter 9 on noise.</p> <p>6. The STS was based on a 17 room hotel, as well as an F&B outlet of 173m² that is open to the public. With respect to trip generation, the maximum number of trips is expected to be generated on weekdays between 16:00 and 17:00 (20 trips). On weekends, a maximum of 16 trips are expected at peak hour between 20:00 and 21:00. For ERA and PA's comments on the STS, kindly direct comments directly to these entities.</p> <p>7. Noted. This would need to be enforced by the Planning Authority.</p>	<p>5. Noted.</p> <p>6. Noted.</p> <p>7. Noted.</p>
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<p>have to be demolished, particularly if the structures are illegal.</p> <p>8. Another raised point that has not been tackled in the EPS is that the proposed development site is bordering agricultural land in the north. A comprehensive study to analyse the present agroecosystem, including conditions of soil nutrient and soil biota, has not been carried out nor has the section on ambitions to protect and safeguard good quality agricultural land from development under the SPED as well as avoiding change in traditional lifestyle.</p>	<p>8. A study of the agroecosystem of agricultural land in the vicinity was not considered to be within the scope of the EIA (and was not included in ERA's ToR); largely because soil in surrounding agricultural land will not be directly impacted as a result of the development. In terms of traditional lifestyle, refer to the landscape assessment, Table 8.8 that specifically considers changes to the rural / natural area Local Landscape Tract within the Delimara Peninsula Character Area.</p>	<p>8. Noted.</p>
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B. Malta Hotels and Restaurants Association (MHRA) (Email dated 12 July 2017)

Comments	EIA Coordinator response	ERA comments
<p>We would like to make our submission to the redevelopment of Delimara Bay Hotel Application PA 02767/16 (EA 00007/16)</p> <p>The Malta Hotels and Restaurants Association (MHRA) encourages redevelopment projects for the tourism industry, such as the proposed redevelopment of existing derelict hotel, including environmentally friendly measures and provision of public ancillary facilities in Delimara.</p> <p>MHRA understands that the development will be confined within the existing footprint, which was already used as a hotel. As a principle, MHRA supports investment in non-traditional tourism zones, which help diversify our product and target new tourism niches market. The main objective of the project is to invest into the Eco Tourism niche, which adopts stringent requirements for sustainable environment and zero carbon footprint.</p>	<p>See paragraph 3.22 for more accurate description of proposed development relative to existing structure / site.</p>	<p>Noted.</p>

C. Comments by members of the public (Emails dated 22 June 2017 – 13 July 2017)

No	Comment submitted by	Comments	EIA Coordinator response	ERA comments
1.	<p>Member of the public</p> <p>Email dated 22 June 2017</p>	<p>With regards to the proposed hotel at Dellimara.</p> <p>The presence of a derilict building of 343msq does NOT justify the building of a concrete monstrosity (they always always are! However much they pretend to try to blend in!) Of MORE than 3700 msq! Please leave our very limited environment alone.</p> <p>This site is beloved and beautiful as it is. If there is an ugly derilict building it should either be torn down or re used AS IS, without increasing it in size, as a small hostel for example.</p> <p>Please stop destroying Malta.</p>	<p>Noted. ERA should ensure that comments in this regard are also sent to the Planning Authority as the entity with the remit to consider public opinion on the proposal.</p>	<p>Noted.</p>
2.	<p>Member of the public</p> <p>Email dated 22 June 2017</p>	<p>I am writing to you to object to the development of this hotel. While the current building is definitely a blemish on the landscape of an otherwise lovely bay, using it as an excuse to EXPAND to a hotel of this size is utterly reprehensible.</p> <p>The design of the proposed hotel also leaves much to be desired. It does not blend in with the surroundings, and further impinges on the landscape. The quality of the landscape value of the bay will decline significantly.</p> <p>Furthermore there will be increased traffic in the area, which will lead to greater pollution, negative noise impacts and an overall inpinging of overdevelopment characteristic of so many other bays in Malta at this point in time (with kiosks, loud music, noise etc.).</p> <p>I also fear this will be the START of an overall development of the area which would be a death knell for Delimara bay as we know it. It's no use seeing things case-by-case and expecting this to be any different. History has shown this pattern in virtually every bay across these islands.</p> <p>What about residents in Malta who want a quiet bay to go to? Especially those in the South of the island? Are we going to sell every square inch of our islands to satisfy the pockets of a few? Frankly, I don't have much sympathy for the developer. He should have looked to other areas. His problem. His loss.</p> <p>Furthermore, this area is one of great natural beauty, and is designated as a site of</p>	<p>Noted. ERA should ensure that comments in this regard are also sent to the Planning Authority as the entity with the remit to consider public opinion on the proposal.</p>	<p>Noted.</p>

		<p>ecological importance.</p> <p>The ERA document attached states the following:</p> <p><i>In terms of impacts on undeveloped land, the site in question is located in a highly sensitive environment and cannot be considered as a prime tourism site. The approved permit on site (PA 4198/09) is for the reinstatement of a restaurant, whilst the current proposal is for the redevelopment of the site into a hotel including extensive excavation works, physical expansion and further ancillary developments directly onto the natural coast that is likely to lead to significant environmental impacts.</i></p> <p>Given the above, I think there needs be no further discussion as to why this hotel and its ancillary developments should be refused outright.</p> <p>Please refuse this development. We've had enough of all this. It would be better to restore Fort Delimara (which is in a terribly derelict state) and the current derelict building be removed and the site restored to as natural a site as it could be following decades of presence.</p>		
3.	<p>Member of the public</p> <p>Email dated 22 June 2017</p>	<p>I wish to object to the above-mentioned Planning Application on the grounds that Delimara is one of the few unspoilt areas of Malta where one can enjoy the countryside and beaches without noise and all the commercialisation that comes with development.</p> <p>Allowing one development in the area will open the floodgates to food vendors, watersports providers, deckchair and sunbed rentals which have spread over most of Malta and Gozo's beaches. While this is comfortable for some, many enjoy the seaside most when it is as unspoilt as nature intended it to be.</p>	<p>Noted. ERA should ensure that comments in this regard are also sent to the Planning Authority as the entity with the remit to consider public opinion on the proposal.</p>	Noted.
4.	<p>Member of the public</p> <p>Email dated 22 June 2017</p>	<p>I am writing as a concerned Maltese citizen with regards the proposal for redevelopment of existing derelict hotel, including environmentally friendly measures and provision of public ancillary facilities, at Delimara Hotel.</p> <p>This is not a good example of regeneration of the south region of our island, but rather an excellent example of degradation, of what is left of it. This is not sustainable. If this is</p>	<p>Noted. ERA should ensure that comments in this regard are also sent to the Planning Authority as the entity with the remit to consider public opinion on the proposal.</p>	Noted.

		<p>allowed, this will be another example of putting the personal business of an individual or a small group, before the public's interest. This area should be left as is or at most be conserved and monitored for example by increasing the number of bins (minor example) in order to always strive for clean seaside areas. No development should be allowed otherwise this would ruin the natural characteristics of the area, for which after all the zones are popular for.</p> <p>I would like to also point out that the area is designated as an area of ecological importance so I kindly ask you to explain why the re/development of the existing hotel being proposed in the first place?</p> <p>I hope that this does not fall on deaf ears, or in this case end up before visually impaired eyes.</p>		
5.	<p>Member of the public</p> <p>Email dated 22 June 2017</p>	<p>My proposal, considering that this land is ODZ, is to raze it to the ground (even by using a north Korean nuclear war head), and give it back to the people as open land.</p>	<p>Noted. ERA should ensure that comments in this regard are also sent to the Planning Authority as the entity with the remit to consider public opinion on the proposal.</p>	Noted.
6.	<p>Member of the public</p> <p>Email dated 23 June 2017</p>	<p>I would like to forward my objections to this hotel redevelopment and extension. The area proposed is ecologically sensitive and remote, two very good reasons to protect it rather than allow development on it.</p> <p>We live in a country where there are less and less opportunities for enjoyment of remoteness, nature and respect for natural ecosystems. It is completely useless to fill the islands with hotels if there are no natural and historical attractions for people to enjoy, apart from the needs of the local population which is increasingly stressed, overworked and struggling to create a balanced life in a country that is increasingly becoming a hot concrete block. Please leave this area alone.</p>	<p>Noted. ERA should ensure that comments in this regard are also sent to the Planning Authority as the entity with the remit to consider public opinion on the proposal.</p>	Noted.
7.	<p>Member of the public</p> <p>Email dated 24 June 2017</p>	<p>Reference is made to the planning application in the subject above.</p> <p>Having looked in detail to the EIA screening report, there are many ways to look at this project. Taking the pessimistic approach there are several arguments that can be brought forward stopping the development of</p>	<p>Noted. The EIA considers alternatives to the existing situation and the project proposal as per ERA Terms of Reference.</p>	Noted.

		<p>this derelict for some reason or another. However, neither the Maltese people using the bay, nor the tourists or even more the developer would have gained anything.</p> <p>I like to take out my family in these areas both in winter and summer. This building is a huge eye sore for anyone approaching the area. Obviously, for us locals, we get use to the scene however I am sure that tourists brought to the site are amazed by what they see. This building has been abandoned and abused for many years and for sure can be utilized for much better.</p> <p>The idea behind these projects should always be to reach a balance between all stake holders however we cannot for example keep on mentioning the environment and the damage that may happen when what we have is already a huge damage to the environment.</p> <p>It would be very nice would the area all around be given a face lift; a good parking, toilet facilities, good access to the sea and much more. All of this can be done via this opportunity with the government investing minimal resources. The developer would like to invest and shall be left to do so in a controlled and responsible manner however he must return something back to the community. All the mentioned above can be integrated as part of the developers obligation towards the upgrading of not only its private space but also the public surroundings.</p> <p>If all is kept reasonable and controlled (not a 10 story building) this project should be positively looked at and encouraged. I reiterate however, that balance is of utmost importance to ensure a win-win scenario. One final note of utmost importance is that whatever obligations are imposed from all regulatory bodies these are watched and properly regulated throughout both the construction and operation phase.</p> <p>Finally, I personally look forward to see something positive being done at Delimara as this place has been for long abandoned and is nothing more than an accident waiting to happen. In such circumstance one should ask how many hospital hours where lost, sick leave taken and other tax money thrown due to accidents which happened on site due to its currents neglected state.</p>		
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		Looking forward for this and similar project to happen,		
8.	Member of the public Email dated 27 June 2017	<p>The GRTU Malta Chamber of SMEs is in favour of redevelopment of derelict areas without the compromising the use of natural land to the present and future generations. GRTU endorses the redevelopment of existing derelict hotel located in Delimara, since we believe that, such development will improve the aesthetical appeal of the surroundings.</p> <p>Embellishing the ambience of the area will eventually attract both foreign tourists and Maltese nationals to make proper use of area which will in turn generate economic activity within the southern sphere of Malta. Moreover, such a project will enjoy a ripple effect on the economic sustainability of a substantial number of businesses which reside in the vicinity of the upcoming development of the Delimara boutique hotel. This implies that a hotel adds bed content to an area which means bringing new people/tourists in the vicinity and hence new money, not only as a new investment of its own but also as sustainability to all other businesses in the vicinity such as restaurants, markets etc. This gives prospective life to the tourism industry in the area.</p> <p>Furthermore, derelict sites are areas which are highly prone to creating safety hazards to the public making use of the surrounding area. The project will eliminate potential chances of harm to the public in general. For all the preceding statements, GRTU is pleased to see the project plan moving towards execution, in a fair, just and transparent manner.</p>	Noted. In a view to ensuring that an informed decision is taken by the Planning Authority, ERA requested this Environmental Impact Assessment to ensure that potential impacts on the environment are considered alongside any potential economic benefits.	Noted.
9.	Member of the public Email dated 28 June 2017	<p>With reference to PA Number 02767/16 (EA 00007/16), I would like to register my interest to make representations and to be present during any hearings and to be informed of all future developments in this case</p> <p>I would also like to make a formal objection in writing to the proposed development. Ideally, the existing derelict building should be demolished and the area returned to its original state. While I have no objection to renovating and re-purposing the existing building <i>within its current footprint</i>, the proposed development increases the area of land taken up by construction by more than 50% in this area of great natural beauty. To add insult to injury, the total footprint of around 3600m2 is completely unacceptable, and will negatively impact the area.</p>	Noted. The stability of the Scheme site as well as the cliff face are potential impacts that were assessed in Chapter 5 of the EPS. Paragraphs 5.30 to 5.44 includes impact assessment of all the geo-environment and Table 5.1 summarises these impacts.	Noted.

		<p>Delimara's beauty and charm are intrinsically linked to its remoteness from the hustle and bustle of development that characterizes so much of Malta nowadays. Building a hotel in the area will ruin this charm. I am also concerned that the concept of an 'ecological boutique hotel' is being purposely misrepresented to further the developer's agenda.</p> <p>Normally an ecological hotel is designed to blend in and merge with the surrounding ecologically sensitive area of the Delimara Peninsula, attracting tourists who appreciate the underlying approach of minimizing disturbance to the environment. How does a hotel comprising 13 luxury suites, 3 superior deluxe suites and 1 presidential suite with a lounge, bar and restaurant, gym, spa and outdoor pool fit this image and land designation? The servicing of such a hotel will lead to greater disturbance of an otherwise quiet bay, not to mention the fear of further rampant development following upon the footsteps of this initial 'redevelopment', as has happened in so other places in Malta. Such a massive project will inevitably lead to further infrastructural development such as new wider (but currently unnecessary) access roads, servicing facilities and buildings.</p> <p>Lastly, I am concerned that insufficient regard has been given to the problem of coastal erosion in the area, which might affect the building's integrity (as has happened in other places such as Ghajn Tuffieha bay).</p>		
10.	<p>Member of the public</p> <p>Email dated 5 July 2017</p>	<p>With reference to PA Number 02767/16 (EA 00007/16), I the undersigned, Chris D'Alfonso, would like to register my interest to make representations and to be present during any hearings and to be informed of all future developments in this case.</p> <p>I would also like to make a formal objection in writing to the proposed development. Ideally, the existing derelict hotel building should be demolished and this Area of High Landscape Value and Ecological Importance returned to its original state. Whilst I have no objection to renovating and re-purposing the existing building within its current footprint, the proposed development increases the area of land taken up by construction by more than 50%. To add insult to injury, the total footprint of around 3600sqm is</p>	<p>Noted. The stability of the Scheme site as well as the cliff face are potential impacts that were assessed in Chapter 5 of the EPS. Paragraphs 5.30 to 5.44 includes impact assessment of all the geo-environment and Table 5.1 summarises these impacts.</p>	Noted.

		<p>completely unacceptable, and will negatively impact the area.</p> <p>Delimara's beauty and charm are intrinsically linked to it's remoteness from the hustle and bustle of development that characterizes so much of Malta nowadays. Building a hotel in the area will ruin this charm. I am also concerned that the concept of an 'ecological boutique hotel' is being purposely misrepresented to further the developer's agenda.</p> <p>A typical ecological hotel would be expected to blend in and merge with the surrounding ecologically sensitive area of the Delimara Peninsula, attracting tourists who appreciate the underlying ethos of minimal disturbance to the environment. How does a hotel comprising 13 luxury suites, 3 superior deluxe suites and 1 presidential suite with a lounge, bar and restaurant, gym, spa and outdoor pool fit this image and ODZ land designation? The servicing of such a hotel will lead to greater disturbance of an otherwise quiet bay, not to mention the fear of further rampant development following upon the footsteps of this initial 'redevelopment', as has happened in so other places in Malta. Such a massive project will inevitably lead to further infrastructural development such as new wider (but currently unnecessary) access roads, servicing facilities and buildings.</p> <p>Lastly, I am concerned that insufficient regard has been given to the problem of coastal erosion in the area, which might affect the building's integrity (as has happened in other places such as Ghajn Tuffieha bay).</p>		
11.	<p>Member of the public</p> <p>Email dated 7 July 2017</p>	<p>Review of the Environmental Planning Statement as part of the proposal for redevelopment of existing derelict hotel, including environmentally friendly measures and provision of public ancillary facilities, at Delimara Hotel</p> <p>My opinion on this development is to demolish the existing building and return the area to int original form, for all the public to use. It would be highly beneficial if in this same area, a public convenience is built.</p> <p>If the hotel is built anyway, I expect that the public can use it's facilities (toilets) since the hotel is using our public land.</p>	Noted.	Noted.

12.	Member of the public Email dated 10 July 2017	To whom it may concern, reference is being made to the public consultation EA 00007/16. We have gone through the eia documents and feel that some concerns are a bit far fetched, on site there already exists a building and is ideal for beach facilities and as summer residence for tourists. This development will surely deter abuse and illegalities once and for all. We have to weigh leaving the place as it is with all its consequences or accept some change which we deem will be of a benefit to the community in general.	The EIA assesses potential significant impacts as required through legislation and in accordance with ERA's Terms of Reference. For each potential impact assessed, the report describes whether the impact is not significant, minor or major, defining all criteria per environmental aspect. Where impacts were assessed to be not significant or even beneficial these have also been noted.	Noted.
13.	Member of the public Email dated 10 July 2017	<p>Would like to take a moment to put forward my views regarding the redevelopment of Delimara Bay Hotel in Kalanka.</p> <p>As a frequent visitor to the bay itself i currently see a high level of neglect in many aspects going on for many years.</p> <p>The dusty landscape with neglected fields and unused birdtrapping sheds do no justice to this bay. The rain water runaway carrying dust and debris into the bay is another issue.</p> <p>If the redevelopment of this small hotel includes improving the surrounding landscape that generates a new healthy ecosystem, i believe it could be a positive project both economically and environmentally.</p> <p>Whoever enquires could find out that this project is to be functionally eco certified to high standards. It aims to improve the landscape by planting new trees and maintaining an ecofarm, boosting local flora and fauna to thrive better in the area, while also monitoring and improving the quality of the seawater for both tourists and the general public.</p> <p>If the project leaves access to the public coastline and manages to keep as minimal visual impact as possible, blending to the natural environment, it could be a new example of how an investment in tourism and a boost in the quality, health and</p>	Noted. The EIA assesses all potential environmental impacts, refer to the Environmental Planning Statement and Chapter 10 in particular for all potential significant impacts identified.	Noted.

		propagation of a patch of environment could work out in symbiosis.		
14.	Member of the public Email dated 10 July 2017	<p>I am convinced that some people who are expressing their concern re the new challenging Kalanka Hotel project in Delimara are missimformed about this most needed project in this area and most probably have never visited this site.</p> <p>I am a regular visitor to this area and it is my believe that this area will be enhanced with the kind of embellishment that the owners are proposing and the whole area will benefit tremendously.</p> <p>Unfortunately some people prefare the shubby atmosphere their is at the moment just for the sake of complaining and not appreciate the effort and investment these people are doing.</p> <p>I think we also have a right to support this project as a family that regularly frequent this area.</p> <p>In my opinion their are alot more Pluses than minuses.</p> <p>We thank the Investors for their commitment to make this area not only Echo Friendly but also reinstate loads of rubble walls and delapedated buildings that have been on the site for Ages.</p> <p>I stand to be corrected but what i hear is that the owner is A fanatic with what is Tradisional Maltese and very much a man who respects and highly values the heritage of our great island.</p> <p>Therefore i think that the authority should support and respect people who are investing money but also respecting the Ambjent.</p> <p>I would suggest that the authority looks at the extreem detail of this project and i am convinced that alot of pluses will be achieved.</p>	Noted. The EIA assesses all potential environmental impacts, refer to the Environmental Planning Statement and Chapter 10 in particular for all potential significant impacts identified.	Noted.
15.	Member of the public Email dated 10 July 2017	<p>I wish to present my full support and endorsement to the proposed re-development of the derelict hotel building at Kalanka Bay limits of Delimara Point.</p> <p>The proposed redevelopment will regenerate in a balanced manner the derelict building which has been an eyesore and a danger since time immemorial. At present this is a sad site to see crying out for regeneration.</p> <p>Needless to state, no one in his right senses will spend his money to regenerate a derelict site without expecting some form of return in a commercially viable way. However the redevelopment must be carried out in a</p>	Most of the suggestions in this submission would require additional environmental impact assessment in accordance with legislation. They would also require assessment against relevant policies.	Noted.

		<p>manner that uses a well defined footprint, respects height limitations commensurate to its surrounding, respects the environment, is ideally pollution neutral, not excessively invasive to the skyline, non excessively noise and light pollutant and preserves total free access to the coast for the general public.</p> <p>It is clear that the plans and designs of the proposed project took into detailed account all the concerns expressed above and I am satisfied that once completed the project will rehabilitate this long neglected bay in the Southernmost tip of Malta.</p> <p>I am therefore strongly recommending the the Environment and Planning Authorities grant the necessary redevelopment permits as requested by the developers, with the following additional conditions:</p> <ol style="list-style-type: none"> 1. the development of a terraced car park accommodating 90 car bays (6 reserved for disabled persons), 4 coach bays and one bus shelter/bay on the land which is currently used as an impromptu parking- this parking area is to offer "subsidized" parking fees (max €7 for day parking) - funds generated will first cover the maintenance of the car park, generate loan repayments for ten years and an annual contribution that will go to generate funds for the restoration of Fort Delimara 2. part of the parking bays should be covered by solar energy panels and part of the bays should be provided with free electric re-charging points 3. the building of a belvedere with necessary safety railings and park benches and an adjacent free public car park for 12 cars and 1 coach near the main gate of Fort Delimara overlooking Marsaxlokk bay 4. the resurfacing and proper upkeep of the road from the former Minto Gharix to Fort Delimara belvedere and forking down to the famous lighthouse (the use of concrete laid in Victorian style is recommended) 5. the provision of public beach platforms levelling undulated rock forming part of the coast line at Kalanka bay 6. the provision and installation of 6 stainless steel ladders for use by swimmers 7. the provision and installation of 6 stainless steel public showers of an approved design 		
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16.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>To whom it may concern</p> <p>I have been following comments posted on facebook re development of Delimara Bay Hotel.</p> <p>I have been a resident in Tas Silg Marsaxlokk for 15 years now , and so far i have not seen any thing built in the favour of residents.</p> <p>The south has been dumped with a power station just in front of our house s view which for many years was a health hazard and an eye sore.</p> <p>A free port also in view from our house which is also an eye sore. The gas plant very close to us and the San Antin re cycle plant. Aren't the above enough negative sites for such a small south?</p> <p>So I was very relieved to hear that the now eye sore old Delimara hotel was going to be developed. The building already exists and i see no harm whatsoever to make it nicer and a place to be enjoyed by the people in the south and tourists alike.</p>	Noted.	Noted.

		<p>I am sure with this development the roads leading to the hotel will be made which is another benefit for us.</p> <p>I am sure the developers in this day and age will follow regulations not to be of any detriment to the environment.</p> <p>I think the people in the south deserve some place of luxury and this hotel will definitely be an asset to the area.</p>		
17.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>My feedback regarding the proposed hotel at Delimara is that it should be encouraged as it will give the area the much needed uplift. The area lacks tourist amenities and this proposal will incorporate some public facilities too. I remember as a kid visiting the area and the place was still running as a bar, restaurant and a kiosk... best memories of my life... please open it as soon as possible.</p>	Noted.	Noted.
18.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>To whom It may concern,</p> <p>Im sending this email with regards to the new development in Delimara (the delimara bay hotel)</p> <p>After looking into the plans that were recently posted in social media, i think that the idea of setting up such an development is well needed for the southern tip of the maltese islands.</p> <p>I dont know if you are aware that the roads to get to the delimara beaches are in a state of total disaster; whilst the kalanka beach is nonetheless. The hotel is in ruins and an eyesore to anyone visiting that area. The idea of setting up an ecotourism hotel, in my opinion will only bring a breathe of fresh air to an area which was previously used as a dumping site.</p> <p>Kindly forward my opinion as to a positive one with regards to building the Delimara hotel- the southern side of the island will only benefit from such a innovative idea!</p>	Noted.	Noted.
19.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>To whom it may concern</p> <p>I write in relation to the application for redevelopment of the Delimara Bay Hotel. For many years my family and myself have been frequent visitors to the bay where the dilapidated delimara hotel stands. I never quite understood why the property was left to rot in such a state. What I understood is that this structure had become a place where abuse of all sorts was ever present. I never allowed our children to go inside. It is a real</p>	Noted. Reference should be made to the EIA for further details about the project, including potential alteratives as well as potential impacts.	Noted.

		<p>pity that such a picturesque bay is loomed over by such a health hazard.</p> <p>Now that finally someone has come up with a solution for this issue, I honestly hope that the authorities concerned make their utmost to ensure that the redevelopment is given the green light. The authorities have all the power and muscle to enforce a project which does not dominate the scene but rather complement it. It will be irresponsible to leave the structure in its current state. From what I understand, the proposed redevelopment will be more of a reinstatement of the existing structure and not an oversized development.</p> <p>We hope that those taking decisions realize that leaving a dilapidated structure to its own demise does not do the environment any justice.</p>		
20.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>To whom it may concern.</p> <p>I support the redevelopment of the Delimara Bay Hotel!</p> <p>I visit the area quite frequently both in summer and during the winter, and I can confirm that the area needs to have some sort of security/surveillance. When it is getting dark the area might get a bit scary with no lights and no security at all.</p> <p>Whilst mentioning the problems surrounding the area, one must not forget to mention the road leading to such a beautiful place. All throughout the road one will find several potholes - resulting in damages to the passing vehicles, not to mention that it is very unsafe! Because drivers are always juggling through the road to try and avoid some of the potholes, leading to more potential car accidents.</p> <p>Speaking about the present derelict building itself and its surroundings, I must say that it is also unsafe for passersby, especially for children and young adults. Needles on the floor used by drug users, are easily spotted which makes the area very unsafe.</p> <p>I believe that this developer must love the area to invest in such a thing (he/she could have invested their money elsewhere in a much more profitable business), therefore I am sure that all the necessary measures and precautions will be implemented to safeguard the whereabouts and make them even better!</p>	<p>Noted. It should be noted that the proposal does not include interventions to the road leading to the Application Site.</p>	<p>Noted.</p>

		Such development would give some incentives to the South of Malta, which I believe is in desperate need for some!		
21.	Member of the public Email dated 11 July 2017	Although in general I am against building on ODZ, considering that there is already an existing structure (which today is an eyesore), I am in favour the redevelopment of this site. Even more so as the redevelopment of this site will offer the much needed facilities that are lacking in the area and ensure its upkeep.	Noted.	Noted.
22.	Member of the public Email dated 11 July 2017	With reference to the redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities at Delimara. We wish to submit our views on this proposal, we are usually against further development in ODZ locations, yet this proposal seems to make use of an already committed disused site. We frequent similar secluded locations in the Mediterranean and believe that if such development is up to standard it will enhance the beauty of the area.	Noted.	Noted.
23.	Member of the public Email dated 11 July 2017	<p>To whom it may concern Ref. PA0267/16 (EA 00007/16)</p> <p>Sirs,</p> <p>As a citizen and inhabitant of the South of Malta, I commend the present owners of Delimara Bay Hotel for turning a decaying eyesore into an environmental gem. I am a frequent visitor of this area and with every year that passes, my heart sunk even lower as I watched the buildings of this hotel abandoned to the elements and rats, thus ruining a beautiful natural gem. My heart sunk even lower when illegal and unauthorized rooms sprung like mushrooms over the whole area which became our Maltese version of Tombstone in the Wild West. We used to say there is no law in Delimara because it was everybody for himself and God for us all.</p> <p>Luckily the present owner of the Delimara Bay Hotel is a lover of nature and a true environmentalist. His plan to develop a Boutique Hotel, catering for nature lovers, agri tourism and open sky sport like hill climbing manages to preserve the natural beauty of the area. It also opens a niche for a new kind of tourism. Since the closure of the Jerma Palace Hotel in Marsascala, the South has been practically devoid of first</p>	Noted.	Noted.

		<p>class hotels and this new venture will inject more money in South's recovering economy.</p> <p>It is very difficult for me to grasp the reason why some journalists are making a fuss about this new hotel which surely will be a shot in the arm to our economy and a welcome environmental gem that compliments the natural beauty of site. It is evident that these people have a personal axe to grind because the great majority of us, Southerners are four-square behind the project.</p>		
24.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>I am writing in support of the Delimara Bay Hotel application.</p> <p>I believe the project is a wonderful idea - a small, well designed Hotel, both disabled and ecologically friendly - a great addition to the local area and to Malta itself.</p> <p>I sincerely hope the project will go ahead and will be an example and inspiration to other new developments around Malta.</p> <p>I myself live in Marsascala and I think locally we are in need of the services and facilities this Hotel promises.</p>	Noted.	Noted.
25.	<p>Member of the public</p> <p>Email dated 11 July 2017</p>	<p>To Whom it may concern:</p> <p>We think that the proposed development will actually leave a positive impact on the area, and should be encouraged to go through.</p> <p>From what can be seen from the artistic impression the building is not high rise and blends well with the environment, it even gives a fresh look to the zone.</p> <p>Taking into consideration what the owners' are planning to create around the actual hotel building will benefit the general public. Since presently the land is privately owned access is restricted, however after the completion of the project, from our understanding there will be free access to the general public.</p> <p>The proprietors seem to be very aware of the ecological value of the land and we are very confident that they will themselves supervise the excavation and the building thereafter, to minimise the negative impact this may have to this sensitive area.</p> <p>We think then when the contents of the report is evaluated in depth, there much</p>	<p>It should be noted that land ownership will not change as a result of the project. That is, public land (which includes the coast) will remain public and private land will also remain private.</p>	Noted.

		more positive aspects than negative ones and we totally in favour of this project.		
26.	Member of the public Email dated 11 July 2017	I wish to submit my approval with this proposal since from what I have seen, great consideration was taken in the design and layout, keeping the same footprint and yet maximizing the capacity as to make this venture viable. Another positive aspect is the public facilities being offered at the beach, whilst hoping that the access is improved, toilets and waste-separation facilities are greatly lacking in this area, and the only possible solution is to have them underground and not visible thus creating an eyesore. What we have seen from the visuals is a extra floor from that existing, yet this is justified since hotels around Malta were granted 2 extra floors. Therefore please consider positively this development as finally it gives some beneficial opportunities to the south of Malta.	Noted. Refer to plans and EIA for details on the project design.	Noted.
27.	Member of the public Email dated 12 July 2017	<p>Following the submission of an application to build the delimara hotel, I am sending thin email as an encouragement so such permit will be issued.</p> <p>Site has been already active in such industry before the 1960s, and by that time since has been abounded and is in a very bad state with danger to public.</p> <p>When considering the application from your side you must encourage this permit and with it propose several conditions in regarding landscaping with native trees. By this the derelict site will now be a state of art and also help increase in the biodiversity in the area.</p> <p>Also you may push with the lands authority to re-embellish the Kalanka it-tawalija as a park in Public Domain area and remove all squatters from the area. This area might be changed into part camping site which at the south of Malta there are no camping zones. Thus having removed the derelict site and a proper hotel built on a legally built pre 60s structure, increase in biodiversity, remove squatters and creation of camping site. By this delimara will be a place where it will be see loads to tourist visiting this area</p>	Noted.	Noted.
28.	Member of the public Email dated 12 July 2017	I find it hard to believe that anyone could complain about this proposal. For too long this derelict building has been a blot on the landscape. I think that Mr Abela should be applauded for his plans to rejuvenate the	Noted.	Noted.

		<p>area and bring much needed improvements to access the bay for swimming.</p> <p>This proposal is ecologically very sound and is just the sort of development that Maltese authorities should be encouraging rather than the excesses of building high rise developments that really are a blot on the landscape of this wonderful country.</p>		
29.	<p>Member of the public</p> <p>Email dated 12 July 2017</p>	<p>We the undersigned are registered part time farmers in the vicinity of the above mentioned Delimara hotel. We give the full support for the above mentioned project to go ahead.</p> <p>In our opinion this development will bring new life and better standards to the long derelict remains of the hotel and the immediate surroundings</p>	Noted.	Noted.
30.	<p>Member of the public</p> <p>Email dated 12 July 2017</p>	<p>With reference to PA Number 02767/16 (EA 00007/16), I the undersigned, would like to register my interest to make representations and to be present during any hearings and to be informed of all future developments in this case</p> <p>I would also like to make a formal objection in writing to the proposed development. Ideally, the existing derelict hotel building should be demolished and this Area of High Landscape Value and Ecological Importance returned to its original state. Whilst I have no objection to renovating and re-purposing the existing building within its current footprint, the proposed development increases the area of land taken up by construction by more than 50%. To add insult to injury, the total footprint of around 3600sqm is completely unacceptable, and will negatively impact the area.</p> <p>Delimara's beauty and charm are intrinsically linked to its remoteness from the hustle and bustle of development that characterizes so much of Malta nowadays. Building a hotel in the area will ruin this charm. I am also concerned that the concept of an 'ecological boutique hotel' is being purposely misrepresented to further the developer's agenda.</p> <p>A typical ecological hotel would be expected to blend in and merge with the surrounding ecologically sensitive area of the Delimara Peninsula, attracting tourists who appreciate the underlying ethos of minimal disturbance to the environment. How does a hotel comprising 13 luxury suites, 3 superior</p>	Noted. Chapter 5 of the EIA considers potential impacts to stability of the cliff face.	Noted.

		<p>deluxe suites and 1 presidential suite with a lounge, bar and restaurant, gym, spa and outdoor pool fit this image and ODZ land designation? The servicing of such a hotel will lead to greater disturbance of an otherwise quiet bay, not to mention the fear of further rampant development following upon the footsteps of this initial 'redevelopment', as has happened in so other places in Malta. Such a massive project will inevitably lead to further infrastructural development such as new wider (but currently unnecessary) access roads, servicing facilities and buildings.</p> <p>Lastly, I am concerned that insufficient regard has been given to the problem of coastal erosion in the area, which might affect the building's integrity (as has happened in other places such as Ghajn Tuffieha Bay).</p> <p>I look forward to an acknowledgement of this objection.</p>		
31.	<p>Member of the public</p> <p>Email dated 12 July 2017</p>	<p>I fully support the project at Delimara, PA 02767/16 EA 00007/16 . We are suppliers in catering and since Jerma Palace Hotel stopped operating our sales went down drastically , an investment there make a big change to the tourist industry, which is much needed in the area.</p>	Noted.	Noted.
32.	<p>Member of the public</p> <p>Email dated 12 July 2017</p>	<p>I am in favour of the redevelopment of the Delimara Bay Hotel.</p> <p>I believe that such development would give easier access to people visiting the area not to mention the safety measures that presently do not exist.</p> <p>The beauty of the area is clouded by the sorry state it is in at the moment.</p> <p>Not to mention that people would be able to freely visit the area throughout the hunting season, because they would not be harassed by the illegal hunters all over the place!</p> <p>I am sure that the developer would want the area to be much better than the state it is in now, because presently some things (roads, illegal dumping, no security, no street lights, etc...) are an eye sore, and no investor would want a hotel to be close to such things.</p>	Noted.	Noted.
33.	<p>Member of the public</p>	<p>To whom it may concern</p> <p>Re: PA 02767/16 (EA 00007/16)</p>	Noted.	Noted.

	Email dated 12 July 2017	<p>I wish to express my approval with this project. I have been a frequent visitor of Delimara for ages and have always wondered why such property has been abandoned and left as it is.</p> <p>It is a prime site and ideal for a high end accommodation and the concept of a self-sustainable ecological accommodation is very positive.</p> <p>So again please consider positively this application as it beneficial to the area surrounding it too.</p>		
34.	Member of the public Email dated 12 July 2017	<p>This part of Malta is crying out for proper upgrading as it has been in neglect for decades. The area is finally bring improved. Reestablishing the delapidated hotel and the reclaiming of the abandoned farm lands will help for sure to upgrade the area. From what I undrrstood the development will occur on private land and on looking towards the cost I rather see a functional hotel and well maintained rather see a run down hotel. In the southern part of Malta there are garbage dumps, sewer trestment plants and power stations but when something poditive, like an eco friendly hotel is propsed, people from the norther part of the island complain. In my opinion the project proposed seems to be very planned out and careful blends with the surroundings, leaving as little visusl impact and low carbon footprint possible.</p>	<p>Noted. Visual impact assessment is considered in Chapter 7 of the EIA. Design measures that aim to address ecological footprint are largely presented in Chapter 3.</p>	Noted.
35.	Member of the public Email dated 12 July 2017	<p>To whom it may concern,</p> <p>In line to the public consultation regarding the proposed Project at Delimara I would like to point my views. The South needs some touristic services and possibilities. I think the project itself is not a treat to the environment but an upgrading. At present the dilapidated building at Kalanka is a real eyesore and will shortly be dangerous to the passersby. A boutique hotel at Kalanka will surely be a plus for the area, at present there are no public toilets, there is no possibility to buy a bottle of water or some snack. The hotel will in a way compensate for the real treats to the environment mentioning some are the power station, the Freeport, recycling plant in Marsaskala.</p>	Noted.	Noted.
36.	Member of the public Email dated 12 July 2017	<p>Re: Kalanka project</p> <p>We would like to express our thoughts regarding the Kalanka hotel proposal. These last three years we are renting a small one bedroom house for short lets in Zabbar. We</p>	Noted.	Noted.

		<p>meet a lot of tourists that are interested to explore the Southern parts of Malta however the Southern part lacks tourist accommodation. They ask us from where they can rent a bicycle or spa and go to nice beaches. A project like this will surely give a new fresh of air to the restaurants in Marsaxlokk and nearby villages like Marsascala or the three cities.</p>		
37.	<p>Member of the public</p> <p>Email dated 13 July 2017</p>	<p>Reference is made to the Redevelopment of an existing derelict hotel including environmentally friendly measures and provision of public ancillary facilities at delimara. I wish to submit my view on this proposal, I am usually against further development in ODZ locations, yet this proposal seems to make use of an already committed disused site. We frequent similar secluded locations in the Mediterranean and believe that if such development is up to standard it will enhance the beauty of the area.</p> <p>Appreciate any kind of feedback and consideration of this development.</p>	Noted.	Noted.
38.	<p>Member of the public</p> <p>Email dated 13 July 2017</p>	<p>To Whom it May Concern</p> <p>RE: Redevelopment of an existing derelict hotel, including environmental friendly measures and provision of public ancillary provisions at Delimara Hotel, Triq Delimara, Marsaxlokk</p> <p>I would like to express my support in favour that this derelict building which has been in such a miserable state for decades be redeveloped into a small hotel as being proposed.</p> <p>The existing structures, existed before 1968 and so are legally present. These structures in their current state are an eyesore in this beautiful area of our islands. The redevelopment as being proposed will surely improve the current situation from a visual point of view.</p> <p>Moreover, it should be noted that in the whole Delimara peninsula there are no public sanitary provisions even though the various Delimara bays are heavily promoted by the Tourism Authority as bathing sites for tourists. (the nearest such facilities are near the Tourist Information Office at il-Magħluq, Marsaxlokk) Having such a small hotel in the area will at least provide a closer place where someone can find sanitary facilities when in need.</p>	Noted.	Noted.

		<p>I am also of the idea that having such a development in the area will surely be a catalyst for the eventual restoration and rehabilitation of the various historical sites close by, namely Delimara Fortress, Wolseley Battery, Tas-Silg Fortress, and St. Paul's Battery. it will also be a catalyst for a better upkeep of the access road (Delimara Road).</p> <p>I understand that there might be objectors who might be against this project because they genuinely love the environment and might think that this development will impinge badly. I sincerely appeal to these objectors, to see the existing situation, to understand that what is being proposed for development is on an already committed site, and to see the wider picture as I explained above which will surely result in a better environment.</p> <p>If this application is not approved we would simply remain with the existing eyesore for further decades.</p> <p>I am a person who lives in Marsaxlokk. I love Marsaxlokk. I have been for 14 years representing the people of Marsaxlokk in the Local Council as Vice Mayor and also as Mayor, and would have surely not written this if I were not convinced of what I am saying.</p> <p>Thus, I appeal to ERA to look into this development favourably</p>		
39.	<p>Member of the public</p> <p>Email dated 13 July 2017</p>	<p>At last something is trying to be done for the eye sore view of the run down Delimara Bay.</p> <p>It will be so good to see something great become of the place. It will be beneficial to all. It will improve the looks, attract lots of people especially tourists (meaning more money for the area, jobs etc). The people of Malta will also visit and enjoy something "new"</p> <p>So I strongly support this development</p>	Noted.	Noted.
40.	<p>Member of the public</p> <p>Email dated 13 July 2017</p>	<p>To whom it may concern,</p> <p>I would like to submit my below input on PA02767/16 (EA 00007/16) regarding the redevelopment of Delimara Bay Hotel application:</p> <p>Where were these objectors when all the tourism facilities were built in the northern area? Such development was not carried out</p>	Noted.	Noted.

		a hundred years ago but in the last thirty years. Is there a north-south divide? Are we the southern people a third class?		
41.	Member of the public Email dated 13 July 2017	<p>To whom it may concern,</p> <p>I have reviewed the proposal for the above mentioned project. Coming from an environmental background and having worked at MEPA (Environment), I am always very cautious which projects to support. I myself frequent the area very frequently and am very disappointed that the existing hotel has been left in ruins, and no sanitary facilities are available. Having reviewed the plans and details I must say I was impressed with the project which will definitely upgrade the area.</p> <p>I would very much like to highlight that such development which respects the environment and its surroundings are to be encouraged.</p>	Noted.	Noted.
42.	Member of the public Email dated 13 July 2017	<p>To whom it may concern</p> <p>I was asked to file an objection regarding this development, however whilst going through the application in detail, I realized that this development makes a lot of sense.</p> <p>As a frequent visitor to the area, I fully agree with this project. These are the reasons why:</p> <ul style="list-style-type: none"> - The area has been left in ruins for too many years - there are no facilities in the area - the project as taking the same built up area (as in footprint) - I believe this concept hotel will serve as a pioneer project for others to come. - this project should attract upmarket clients experiencing a new side of the island of malta - there will be full public access to the less abled people (something which is completely missing at the moment) - the proposals clearly shows that I will still be able to enjoy my weekly dip in this beautiful area. 	Noted.	Noted.
43.	Member of the public Email dated 13 July 2017	<p>To Whom it may concern,</p> <p>I would to show my support in favour of this project. Currently the place is in a very bad state where people are dumping their rubbish appart from the dangerous state of the building. As mentioned in the plan there will be public facilities and restaurant, which will be of benefit for the people attending the</p>	Noted.	Noted.

		<p>beach as the closest place is either marsaxlokk or zejtun.</p> <p>I hope that ERA looks into this project favourable.</p>		
44.	<p>Member of the public</p> <p>Email dated 13 July 2017</p>	<p>To Whom It May Concern,</p> <p>Re: Delimara Redevelopment</p> <p>I am writing to express my support for the above mentioned project.</p> <p>I believe that the approval of this development will be a positive attribute to the site which is currently in a derelict state and an eyesore in the area.</p> <p>The proposed boutique hotel will not only enhance the site in question but also contribute to the overall elevation of the area while also providing local employment opportunities within the sector.</p> <p>Projects of such a nature, where an already existing, committed site is regenerated will receive my continuous support and I believe such entities who take on these project should be encouraged.</p>	Noted.	Noted.
45.	<p>Member of the public</p> <p>Email dated 13 July 2017</p>	<p>One who has travelled, surely has experienced that places like this do exist. These bring out the best of what the Mediterranean has to offer. I do not see this as a treat to nature in any way. There are by far many more threats to nature and tourism in our country, such as concrete blocks and building cranes around Sliema and St Julians ...</p> <p>High time Malta attracts more eco loving travelers ...Having lived in the south of Malta for all my life, mostly in M'xlokk, I feel that it is high time that such a project is launched.</p>	Noted.	Noted.