## Reclaiming land for even more luxury apartments



The recently launched draft master plan for Paceville proposes pushing the existing Portomaso development further out at sea, so as to flank the Dragonara Casino.

Scouring through the new master plan unveiled for Paceville which is currently open for public consultation, one stumbles across the proposals for site 6 – Portomaso.

Despite being given the green light in 2014 to develop 46 bungalows around an artificial lagoon, Portomaso has not yet satiated its hunger for land. The only difference this time round is that applicant had to come to terms with a major constraint — availability of land — and thus the spectre of land reclamation has reared its head. In fact, the master plan is proposing the reclamation of 125,000 square metres of the seabed, of which one-third would be built-up, such that the new Portomaso promontory would flank the Dragonara casino one.

In public submissions received during an earlier consultation on the partial review of the North Harbour Local Plan (with particular reference to the Paceville area), Din I-Art Helwa had flagged the ecological impact of land reclamation in the adjacent sea by stating "the North Harbour areas are characterised by Posidonia fields which are protected by law". Spot on.

I would bet my last dime that the comments submitted by the public during the current sixweek consultation period will be dominated by concerns over traffic, parking and the inconvenience caused by unrelenting excavation and construction. Very legitimate concerns, mind you... but invariably, any impacts beyond our immediate grasp and understanding get swept under the carpet. This is true in many cases of impacts on the marine ecology of a site.

When in 2013 the government launched an international expression of interest for potential land reclamation, an 'environmental constraints' CD detailing the various environmental designations applicable to the seas around Malta was distributed to all interested parties. This was a laudable step since it anchors the environmental dimension from day one, clipping the wings of any

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reclamation proposals that do not give consideration to environmental assets of particular marine areas.

In the Portomaso master plan, a similar but somewhat watered-down proviso was also included – "This area is adjacent to a Marine Special Area of Conservation to the west of the site, and, therefore, a sensitive development approach would be required for this site". I would have gone one step further, so as not to risk giving potential applicants or investors a false impression over the planned development in question. I would have added that any development will be subject to the findings of an environment impact assessment (EIA) and possibly even of an appropriate assessment (AA), given the possible presence of protected habitats and species and the close proximity to a marine Natura 2000 site – the North East Marine Protected Area.

Reclaiming small areas of the seabed within committed marine sites, such as ports and harbours, as has happened on numerous occasions during wharf development in the Grand Harbour and Marsaxlokk Bay, is certainly not comparable with reclaiming parts of the seabed along an exposed stretch of coastline which might still support Posidonia oceanica seagrass meadows, which are listed as a priority habitat in the EU's Habitat Directive.

Restricting the environmental impact to just the reclaimed footprint will be next to impossible, given the exposed nature of the site and Malta's poor track record in enforcing the use of mitigating



Will all the possible marine ecological impacts of the proposed land reclamation exercise be taken into account?

measures such as silt curtains. One might recall the forfeiting of the bank guarantee imposed on the original Portomaso development for impinging on the seagrass meadows on site through the yacht marina excavation. Will a similar scenario play out as well this time round?

It is doubtful whether bank guarantees have any deterrent effect on such large-scale development. And at the end of the day what will be gained after all this angst? Half of the proposed development is real estate (i.e. luxury apartments) while another 44 per cent will be allocated for tourist accommodation. These land uses are hardly of an overriding social importance to warrant reclamation in an environmentally-sensitive area.

The seagrass is not the only issue – the mouth of Spinola Bay, which houses the site in question, is renowned for its populations of the Noble Pen Shell (Pinna nobilis), a large, iconic bivalve endemic to the Mediterranean

I have mentioned the possible occurrence of just two protected marine habitats and species but it is not far-fetched to expect other caveats for such a development to emerge during a detailed study of the area. So would it not have been more prudent to publish the development plans for the area only after conducting an updated marine survey of the area, so as not to temper the findings of an eventual EIA study by imposing the direction that planning for the area should take?

What purpose and weight will the findings of an EIA have in the face of a fait accompli, which the master plan is effectively disguised as? The Żonqor Outside Development Zone educational establishment springs to mind, as a fitting analogy.

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