



GIBRALTAR HERITAGE TRUST

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Paul Origo
Town Planning Dept
Suite 631
Europort
Gibraltar

Your Ref: BA12850
Our Ref: 15_140
Date: 18th November 2015

Dear Paul,

**BA12850 Rosia Bay - Redevelopment of Rosia Bay for leisure and residential use – EIA
CONSULTATION FEEDBACK**

Thank you for your email of 29th October. We have studied the EIA document and would comment the following:

- 1) As an EIA we find the document to have analysed and considered many of the points discussed and brought up with the applicants during consultation and site meetings.
- 2) Chapter 8: LANDSCAPE AND VISUAL AMMENITY
We find that although the discussion and consideration of the visual impacts of the development is covered, the EIA is lacking in supporting images that show the proposed views from the vantage points identified. We largely agree with assessments of impact of views summarized in table 8.8 and also agree with point 8.14.5 that there will be 'adverse visual impact on certain receptors'. The question we are concerned with is whether these are acceptable impacts in the context of the wider project. We do not believe they are.
- 3) Chapter 9: ARCHAEOLOGY & CULTURAL HERITAGE
9.4.22 the original cobble stones still survive in large areas of the mole and have been observed to be in good condition. It should be feasible to uncover, restore and repair them to bring them back into use.
9.5.10 – more a comment for the operation phase of the project, but also relevant for the construction phase in reference to construction workers and site visitors; provision should be made by the Ministry for Heritage and the Gibraltar Museum to place signage on site alerting users of their legal obligations vis-a-vis finds and possible antiquities. Monitoring would also be required.
9.5.14- an important observation point is from the Parson's Lodge terrace, looking northwards towards Napier of Magdala Battery. We do not agree that the purpose of Parson's Lodge was only to look out to sea. Parson's Lodge would have been observing the Bay and the coast in both directions, therefore views out, also from the bunker and gun positions levels are significant.
9.5.17 – we do not agree that the development will result in a limited change in character. We consider the character change to be significant, more so with the latest revised scheme which introduces 6 apartments and a rooftop restaurant which will now juts above the line

of the defence wall.

4) Chapter 11: TRANSPORT

11.4.36 – we find this observation to be incorrect. There is high demand for parking from Camp Bay and Little Bay users in the summer months. The peak times (weekends in summer) the authors observe as being busy would be exactly the time that you'd expect increased usage. Adding to this demand with a third amenity without making provision for the demand is not, in our view, a manageable situation.

11.5.4 the addition of 40HGV movements per day to this already congested area will compound the problem further and make life for residents in the area miserable.

Provision needs to be made or a solution found for the logistics required for deliveries to the site and the removal of waste. This could potentially cause a bottleneck and/or eyesore.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'CMontado', written in a cursive style.

Claire Montado
Chief Executive