

ΔΗΜΟΣ ΠΟΛΕΩΣ

25ης Μαρτίου, Τ. Θ. 66019
8830 Πόλη Χρυσοχούς
Τηλ. 26321321, 26321079
Φαξ. 26322278

E-mail: polismunicipality@cytanet.com.cy



POLIS MUNICIPALITY

25th March Str., P.O.Box 66019
8830 Polis Chrysochous
Tel. 26321321, 26321079
Fax. 26322278

E-mail: polismunicipality@cytanet.com.cy

12 October 2016

URGENT

To the Council of Europe
Secretariat of the Bern Convention
Avenue de l' Europe 67075
Strasbourg, France

Proposed development at Limni area Information on Environmental Aspects

I am pleased to inform you that on behalf of the Council of the Municipality of Polis Chrysochous and the elected leaders of the 19 communities – villages of the region of Polis Chrysochous, Pafos District, Cyprus (north-west part of Cyprus), we had had the pleasure of the visit of Mr Fernandez Galliano and Mr Paolo Casale on the 11th of October 2016 to Limni Bay site, and to the offices of the Municipality, where we believe they formed an accurate picture of the environment and the proposed development.

They also visited another area, near the Limni Bay site, the “Natura” Hotel, with a sandy beach, located very close to the coast, where the nesting of turtles is increasing every year.

Mr Fernandez Galliano and Mr Paolo Casale also met the delegation of the elected leaders of all villages of the region.

All of us expressed our thanks to the Council of Europe for the interest it has shown in the protection of the natural environment of the area. At the same time we asked the support of the Council of Europe to encourage sustainable development, such as the Limni Bay project, thus facilitating the

prosperity in the area, the creation of new jobs, the reduction of unemployment and the prevention of migration.

We handed to your representatives two letters. One from the Mayor and a second from the Mayor and all nineteen Communities of the region (are attached).

The above letters express our firm support for the Limni Bay project, as it has been recently approved by the Environmental Authority of the government of Cyprus (dated 2nd August 2016).

At the same time in our letters, the local authorities of the area, we are asking your esteemed Council to take into consideration the three pillars of sustainability: social needs, economical needs and environmental protection.

We avail ourselves at your disposal and we express once more our thanks and deep appreciation

Remain yours, sincerely,

Mayor of Polis of Chrysochous



Angelos Georgiou



Requested: This letter and the attached material to be distributed to all delegations of the member-countries of the Bern Convention

Notification

1. Deputy Minister to the President of the Republic, Mr. C. Petridis, for the President of the Republic
2. European Commission, Director General DG ENVI, Mr. Daniel Crespo Calleja 1049 Brussels, Belgium
3. Ambassador of Cyprus to Brussels, Mr. Cornilios Corniliou

4. Ambassador of Cyprus to Strasbourg, Mr. Marios Lyssiottis
5. Director General of the Ministry of Foreign Affairs
6. Director General of the Ministry of the Interior
7. Director General of the Ministry of Industry, Tourism and Energy
8. Director General of the Ministry of Agriculture and the Environment
9. Director of the Town Planning and Housing Department
10. Director of the Department of the Environment
11. District Officer of Pafos
12. Mr. Fernandez Galliano Council of Europe, Bern Convention,
Strasbourg France
13. Mr. Paolo Casale
14. C/o Cyprus Limni Bay Resort and Golf Courses

ΔΗΜΟΣ ΠΟΛΕΩΣ

25ης Μαρτίου, Τ. Θ. 66019

8830 Πόλη Χρυσοχούς

Τηλ. 26321321, 26321079

Φαξ. 26322278

E-mail: polismunicipality@cytanet.com.cy



POLIS MUNICIPALITY

25th March Str., P.O.Box 66019

8830 Polis Chrysochous

Tel. 26321321, 26321079

Fax. 26322278

E-mail: polismunicipality@cytanet.com.cy

To the Council of Europe

Bern Convention

10 October 2016

Standing Committee

Proposed development at Limni area Information on Environmental Aspects

As the **Mayor** of Polis Chrysochous, I welcome you to Cyprus and to our town. We are certain that your visit will be beneficial, giving us the opportunity for the first time to provide you with our views as well as other specific information that we think you will find very useful.

1. Introduction

This document provides information on environmental aspects of the proposed development at Limni area, based on the recent Environmental Opinion issued on 2nd of August 2016 by the Environmental Authority of Cyprus after all procedures have been followed. This information is also based on material that is contained in all the various Environmental specialized studies that have been prepared for this purpose.

It is worth noting that in the preparation of the studies for this project the Company has employed local and international environmental experts in various fields. Amongst them turtle experts from Greece and the United Kingdom are included, such as

- John Pantis, Professor in Ecology of Biology Department in Aristotle University of Thessaloniki, Greece, former vice president of NGO Medasset (until 2015) and former President of the Zakynthos Marine National Park. Currently, Director General of the Ministry of Education of Greece.
- Dr. Katselidis Kostas, a PhD biologist educated on tourist pressures on marine turtles habitats, currently scientific associate of the Zakynthos Marine National Park
- Dr. Alan Rees, University of Exeter, author of many publications about sea turtles
- LuxPopuli, an international specialized company on Light Pollution modelling, in Mexico.

2. General information

In 1980 the land was purchased by the present owner Cyprus Limni Resorts and Golfcourses Plc, who recently succeeded with great efforts to restore the used land from its previous mining operations, under the supervision of the Environmental Authorities, at its own expense exceeding 35 million Euro, awarding a contract under the management of the French company Sogreah (Artelia Group). Amongst other areas, the company restored part of the beach fronting the project by removing tailings disposed there during the transportation activities of the mining products under the supervision of governmental authorities. The abovementioned restoration has been a long standing request by the Municipality of Polis and all the local Communities of the area.



Old crater of about 120 m depth



Old crater filled



Mining tailings at Limni beach before cleaning by the Company



Limni beach after cleaning



Restored Land after the mine tailings have been removed

The total area of the project-development is 310 ha of which just 2.8 ha, that is less than 1% of the area, is part of the NATURA 2000 protected area CY4000001 PERIOCHI POLIS-GIALIA. It should be noted that this part of the area falls behind the beach and the existing coastal road, has no habitat type or species of community interest and during the last ten years is cultivated with crops.



3. Ecological importance of the area

According to the Management Plan for the CY4000001 PERIOCHI POLIS-GIALIA, which has been prepared by the Department of the Environment, the whole length of the Natura area is about 11 km along the Polis Chrysochous gulf. The 750 m length of the coast, in front of the Limni project is an important spawning and nesting habitat for the priority sea turtle species *Caretta caretta*. An indication of the ecological significance of the beach is given by the data supplied by the Fisheries Department of the Republic of Cyprus, according to which the number of sea turtle nests in 2014 at the coast of the whole protected area of 11km was 554, of which 62 nests are located at the Limni beach. The ecological significance of the nesting beach is recognized and assured by the Appropriate (Environmental) Assessment study carried out in 2013, as well as by the updated Appropriate Assessment study in 2016 by the Department of the Environment, based on updated specialized studies which have taken in consideration the area of the project and all its elements as well as the surrounding area and existing projects up to Polis Chrysochous to the west and up to Yiallia to the east.

4. Impact of the project on the protected area

Firstly, it should be emphasized that the established Natura Line of the Polis-Gialia area has been approved by the European Commission in 2008 and since then has never been altered, amended or reduced. At the Limni site the width of the Natura zone varies from 130 to 200 meters in contrast to the width of 65 to 100 meters that is applicable to the rest of the Natura zone. In my knowledge as Mayor of Polis Chrysochous for the past 15 years the Natural zone (previously known as Ecological zone) has not been altered, amended or reduced since 1995 when it was first published.

It is also in our knowledge from the Environmental Opinion of 2013 that there was never any condition imposed in it requiring that the buffer zone should be extended more than the maximum of 200 meters.

The Department of the Environment and Fisheries Department, having recognized from the very beginning the ecological importance and sensitivity of the area, and knowing that the natural environment especially sea turtles should be perceived as an added value to the economic development of the area, required that specialized studies should be done for the Limni Project to ensure that the habitat will not be negatively affected by the Limni Project. Furthermore, all

necessary mitigation measures have been imposed by the Environmental Authority and are required by law to be implemented during the construction and operation of the project to ensure the maximum environmental protection and even more its enhancement.

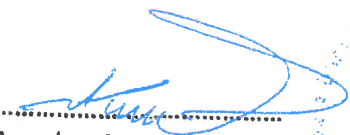
Thus, amongst others, the following measures and conditions are required to be implemented by the Environmental Authority:


- No building construction will take place in the designated Natura 2000 area.
- The width of the buffer zone between the nesting beach and the hotel will be no less than 280 meters, whereas the width of the buffer zone between the nesting beach and the dwellings will not be less than 200 meters.
- In addition to the above, and beyond the Natura line, a tree-planted zone, 20m wide, has been imposed by the Environmental Authority, in front of the first row of houses closest to the beach, in order to operate **as an additional screening measure** to provide maximum protection of the nesting beach from light.
- The above are **not** the only measures implemented concerning the elimination of light on the beach and sky glow. According to a specialized **Turtle Lighting Masterplan** study that has been carried out as part of the Appropriate Assessment studies, a Lighting Zone Plan will be implemented over the whole project to mitigate direct and indirect lighting as well as sky glow. The study was based on the Florida Model Lighting Ordinance and the Dark Sky Association guidelines. The emission of light beams which may reach the beach and thus affect sea turtles was calculated by a **three dimensional model**.
- The Management Plan for the CY4000001 PERIOCHI POLIS-GIALIA as well as the updated EIA contain a plethora of measures and conditions that ensure the full environmental protection of the important species and habitat types of the NATURA area. It should be stressed that, the company has expressed its firm irrevocable commitment to support and implement all the proposed measures and conditions. Amongst others, the company has been committed **to assist financially in the proper management of the nesting beach with staff to be employed (warden) by the Environmental Authority**.
- Further, the Company, with the consent of the Environmental Authority, will construct wooden fences along the sand dunes to restrict and guide the entrance to the beach and will contribute financially to the construction of an Information Centre on Turtles, as well as an Environmental Observatory, to promote public awareness and applied research on sea turtles, a measure that the Municipality welcomes and supports.
- In addition, the existing primary road, which runs adjacent to the beach, and presently connects the Polis Chrysochous Town with Pomos village, will be eliminated and instead a new planned road will be constructed at a distance of about 450 m south from the coastline. Moreover, approximately 400 meters length of this road **will be constructed as a tunnel**. That means that the light pollution from the cars headlights which now affects directly the spawning site of the sea turtles, will be eliminated, as the new planned and covered road moves far away from the beach. The new tunneled road will be constructed by the Company at its own cost. This measure is again welcomed.

For those who want to objectively assess the project, it is clearly demonstrated from the updated Environmental Impact Assessment (Appropriate Assessment study 2016) that the creation of the Limni Resort will contribute towards the sustainability and enhancement of the environment and the protected area.

It is our firm belief that this project and the measures proposed will serve in the future as a pilot prototype for the implementation of sustainable developments in the area, considering the environment as an added value.

We welcome you again to our area and we thank you for your efforts to help us. We believe that your visit gives you the opportunity to form a clear and objective picture.


.....
Angelos Georgiou
Mayor of Polis Chrysochous



October 10, 2016

To Secretariat, Bern Convention

Council of Europe

Avenue de l'Europe

F-67075 Strasbourg Cedex

Visit of Delegation from the Bern Convention – Council of Europe at the Limni Area

Views of the Municipality of Polis and of all Local Communities

We welcome your visit to Cyprus and we would like to thank you for the interest you have shown in the protection of the environment of Cyprus and in particular of the Limni Area, part of which falls within the Polis-Yialia Natura 2000 network, and for giving us the opportunity to express our views. Your efforts to help us to protect the Cyprus environment are very much appreciated.

With your visit, you will have the opportunity, first hand, to obtain accurate and objective information about the environmental aspects of the area and the proposed development at Limni in order to alleviate any concerns you may have.

Cyprus Limni Resorts and Golfcourses Plc is the owner of the proposed project in a freehold land of about 3.30 million square meters in Limni Area, Polis Chrysochous, Pafos District. The objective of the Company is the creation of Limni Bay Resort, a unique project of high value and aesthetics that basically will consist of two signature golf courses of 18 holes, a small international five-star luxury hotel, a wellness centre, two club houses, one for each golf course, a range of high quality residential units, sports facilities and other amenities. The Project aspires to be a point of reference for its contribution to the communities of the region, but also for the effective protection of the environment and the habitat itself.

Recently, the Director of the Environment issued his Environmental Opinion and it is expected that the Town Planning and Housing Department will soon proceed, under the law, with the issuance of the revised Town Planning Permits, which include the hotel. The Planning Permits will include all the conditions and restrictions of the Environmental Opinion that fully protect the environment and the turtles nesting habitat. Indicative of such conditions and restrictions is the rejection by the Environmental Authority of three rows of bungalows (65 units), that were part of the proposed hotel.

The Local Authorities of the area are aware of the Environmental Opinion and are fully satisfied by the measures, terms and conditions imposed that fully safeguard the integrity of the habitat. The Project is strongly supported by all 19 communities of the area and the Polis Municipality and will contribute to the development of the region by substantially upgrading the tourist product, and by helping to reduce unemployment, encourage people to stay to their own land thus avoiding desertification, better distribution of their agricultural products, adding value and wealth to their properties and generally improving the quality of life of all people in the area. But at the same time adopting all the necessary measures and restrictions.

As we have ascertained, the buildings will be constructed far away from the coast and outside the "Natura" line, i.e. the hotel 280 meters and the Villas about 200 meters from the coast.

Also, among the very important measures that will be implemented is the elimination of the existing primary road, that runs parallel and very close to the nesting beach and which creates a lot of environmental problems to the habitat (light and noise pollution), and its relocation at a distance of approximately 450 meters away from the beach. This road will also be tunneled thus eliminating considerably the light and noise pollution on the nesting beach. Similarly, the existing road from Kinousa village that joins vertically the existing primary road close to the center of the nesting beach will also be eliminated and replaced by a new connecting road at the edge of the Limni area. All the above, will be constructed by the Company at its own cost.

Finally, we wish to inform you that the Company has already spent tens of millions of Euro for cleaning up the area of the mining tailings from the previous use, abandoned by the previous owners operating the mine, in order to fully restore the natural environment. The land has now

been fully and successfully reinstated with significant positive effects on the natural environment, the health of the residents of the area and the habitat itself.

It is expected that the Company will proceed with the implementation of the Project around the middle of next year, after the issuance of all Permits and we are assured that this will be, with absolute respect and care for the environment and safeguard of the integrity of the habitat, with the strict control and supervision of the Government Authorities. Without adding unnecessary measures which will increase costing and make the Project very expensive and not viable.

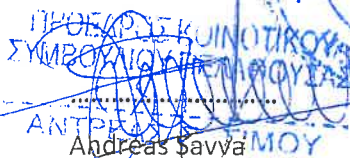
All measures, restrictions and other conditions imposed by the Director of the Environment, must be fully implemented.

We thank you again.

Yours sincerely,



Angelos Georgiou
Mayor of Polis Chrysochous



ΠΡΟΕΔΡΟΣ ΚΟΙΝΟΤΙΚΟΥ
ΣΥΜΒΟΥΛΙΟΥ ΠΕΛΑΘΟΥΣΑΣ
ΑΝΤΡΕΑΣ ΣΑΒΒΑ

Andreas Savva
President of the Community
Council of Pelathousa



Spyros Pelopidas
President of the Community
Council of Argaka



Andreas Christodoulou
President of the Community
Council of Kynousa



Stavros Petrou
President of the Community
Council of Makounta



Marios Theocharous
President of the Community
Council of Agia Marina



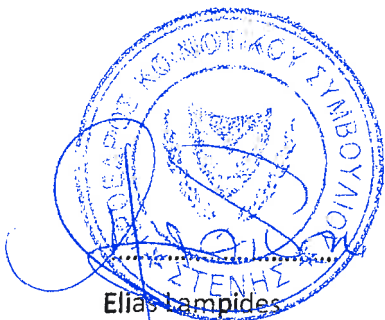
Mamas Gregoriou
President of the Community
Council of Gialia



Evangelos Stylianou
President of the Community
Council of Pomos



Andreas Christodoulou
President of the Community
Council of Neo Chorio



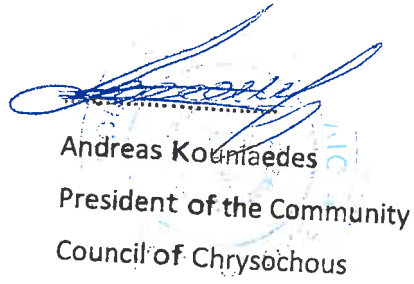
Elias Lampides
President of the Community
Council of Steni



Andreas Kaponides
President of the Community
Council of Peristerona



Christakis Michael
Christakis Michael
President of the Community
Council of Lysos



Andreas Kountaedes
Andreas Kountaedes
President of the Community
Council of Chrysochous



Stelios Antoniou
Stelios Antoniou
President of the Community
Council of Goudi



Antonis Nicolaou
Antonis Nicolaou
President of the Community
Council of Skoulli



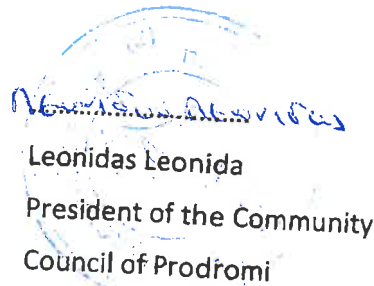
Ioannis Papachristofi
Ioannis Papachristofi
President of the Community
Council of Nea Dimmata



Demetris Chr. Tsadiotis
Demetris Chr. Tsadiotis
President of the Community
Council of Fil. Chrysochous



Leonidas Nicolaou
Leonidas Nicolaou
President of the Community
Council of Pachyammos



Leonidas Leonida
Leonidas Leonida
President of the Community
Council of Prodromi



Andreas Kalasides
Andreas Kalasides
President of the Community
Council of Polis Chrysochous