

██████████
Transport Malta
Integrated Transport Strategy Directorate
Sa Maison Road
Floriana, FRN 1612

11th November 2016

Dear ██████████

National Transport Strategy 2050 and Transport Master Plan 2025: Appropriate Assessment & SEA Environmental Report

Decision in terms of Regulation 19 of the Flora, Fauna and Natural Habitats Protection Regulations, 2006 (S.L. 549.44)

Consultation in terms of Regulation 7 of the Strategic Environmental Assessment Regulations, 2010 (S.L. 549.61)

Reference is made to Transport Malta's consultation on the National Transport Strategy 2050 and Transport Master Plan 2025, the SEA Environmental Report and the Appropriate Assessment which the Environment and Resources Authority (ERA) received by email on 19th October 2016.

I am enclosing ERA's comments and recommendations on these documents with the intention of ensuring that such important plans improve the current transport situation in the Maltese Islands whilst avoiding or mitigating environmental impacts, particular those on the natural environment.

Yours sincerely,

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cc. ██████████
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ERA's comments on the National Transport Strategy (2050) and Transport Master Plan (2025), Appropriate Assessment and SEA Environmental Report

11th November 2016

1. Introduction

- 1.1 The Environment and Resources Authority (ERA) notes the preparation of Malta's National Transport Strategy 2050 and Transport Master Plan 2025. The need for a holistic and comprehensive transport policy has long been felt, in particular to address the current transport situation and the associated environmental issues, including the need for better coordination with land use and development. It is noted that the Strategy and Master Plan were subjected to both an SEA procedure and a plan-level Appropriate Assessment study.
- 1.2 ERA welcomes the opportunity to comment on the Strategy and Master Plan together with the Environmental Report in accordance with Regulation 7 of the SEA Regulations of 2010. Moreover, following ERA's request, a plan-level Appropriate Assessment (AA) study was carried out¹ to assess the impacts of the Strategy and Master Plan on Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The AA process provides the basis for ERA's decision in terms of Regulation 19 of the Flora, Fauna and Natural Habitats Protection Regulations of 2006 (S.L. 549.44).

Summary

- 1.3 Strategically, ERA has the following significant concerns:
- (i) significant impacts on the SACs of Ghadira, Wied il-Mizieb and Is-Simar, and on the landscape, character and the physical environment of these sensitive areas, are expected to occur as a result of the TEN-T projects at Ghadira (Mellieha) and Xemxija Bypass (Xemxija);
 - (ii) significant impacts are expected on the coastal/marine environment, biodiversity, SACs/SPAs (amongst others), from the construction of the Malta-Gozo Fixed Link;
 - (iii) significant impacts on the marine environment and marine SACs/SPAs are likely to occur as a result of further intensification of activities and infrastructural/upgrading works at ports and harbours, including Marsaxlokk, Mgarr and Cirkewwa; and
 - (iv) significant cumulative impacts on the marine SAC "Zona fil-Bahar fil-Grigal ta' Malta" as a result from the proposals in the Master Plan together with other major proposals affecting the same marine SAC.
- 1.4 These issues require further consideration at strategic level, including environmental assessment of alternatives.

General comments

- 1.5 It is unclear whether the SEA Environmental Report and the AA study were conducted on the previous public consultation version of the Master Plan 2025,

¹ ERA provided Terms of Reference for the preparation of a plan-level Appropriate Assessment (AA) study for the Strategy and Master Plan by email on 29th July 2016.

rather than the latest version 2 of the Master Plan. **ERA requires clarification on this matter, including the differences between the public consultation draft and version 2 of the Master Plan. Both the SEA Environmental Report and the AA study need to be updated and/or revised accordingly.**

- 1.6 Generally, ERA considers that cumulative impacts were not sufficiently addressed in the Environmental Report and the AA study. **It is recommended that both the SEA and AA studies should be updated to address these impacts as highlighted in the relevant sections below.**

2. Appropriate Assessment

- 2.1 In accordance with Regulation 19 of the Flora, Fauna and Natural Habitats Protection Regulations of 2006 (S.L. 549.44), ERA needs to determine whether the Strategy and/or the Master Plan would have a significant impact on the terrestrial and marine SACs and SPAs.
- 2.2 ERA has reviewed the AA study, its findings and recommendations as part of its assessment, and provides the following comments and reactions.

Level of detail of the assessment

- 2.3 Generally, ERA concurs with the conclusions of the AA study regarding the impacts of the Strategy and Master Plan on SACs/SPAs. The challenges for carrying out this type of plan-level assessment on a National policy containing very limited or no details is also noted. However, although the Master Plan 2025 does not provide details, the projects and proposals contained therein are relatively specific and in various instances can be related to a geographical location. **ERA considers that the AA report needs to be revised so that the impact assessment in Section 6 is more in depth and specific according to the potentially-problematic proposals, projects and measures in the Master Plan.**

Impacts on protected sites: Master Plan 2025

- 2.4 The AA study acknowledges that the preferred Scenario 4 “Do-Something 2” is aimed at reducing reliance on the private car. This Scenario consists of four TEN-T road projects, two of which are considered as committed (Kappara Junction) or at an advanced design stage (Addolorata Junction). The upgrading works at Kappara Junction were subjected to an EIA and a project-level AA. **ERA considers that strategically, the four priority road projects which are to be implemented as part of the Master Plan 2025 are unlikely to have significant impacts on SACs/SPAs.**
- 2.5 However, **other proposals which are to be implemented as part of the Master Plan 2025 could have significant impacts on SACs/SPAs.** The main problematic proposals are those affecting the coast or the marine environment. This was also highlighted in the AA study. Table 1 summarises the main significant impacts of the proposals in the Strategy and Master Plan on SACs/SPAs as identified in the AA, together with ERA’s comments and recommendations.

Table 1: Impacts of the NTS and TMP on SACs and SPAs as identified by the AA study

Section	Impacts identified	ERA comments	ERA recommendations
6.1.2.2 - Marine SAC Il-Bahar fil-Grigal ta' Malta			
Loss of Benthic Habitat			
Para. 92, page 83	Major/significant negative impacts on Posidonia and benthic habitats expected as a result of physical interventions to the Mgarr and Cirkewwa harbours.	<p>The AA study does not assess the impacts of the projects in detail. The AA needs to refer to specific projects and interventions which are specified in the Master Plan and which may impact protected sites, such as the upgrading works at Mgarr harbour including the breakwater, the proposed third berth and dredging works. The reconstruction of the south quay at Cirkewwa could also be a potentially high-impact project, depending on the level of intervention that is envisaged.</p> <p>The AA does not consider the cumulative impacts of the coastal and maritime projects and interventions in the Strategy and Master Plan on the SACs. Nor does it consider the effects of such projects together with the impacts of other current major proposals outside the Master Plan which could still have cumulative impacts on the same affected SAC. The proposals in the Paceville Master Plan, such as the land reclamation projects, are an example.</p> <p>The AA should consider the extent that this SAC could be affected through permanent changes such as hydrographical conditions, which could affect habitats well beyond the site subject to interventions.</p>	<p>The AA study needs updating in order to:</p> <ol style="list-style-type: none"> 1) provide a more detailed and specific assessment of the impacts of the proposed projects and interventions; 2) consider relevant cumulative impacts; 3) consider impacts due to permanent changes such as hydrographical conditions, which could affect habitats well beyond the site of the interventions; and 4) include suitable mitigation measures. Cumulative impacts, assessment of strategic alternatives and impacts which could make a proposal environmentally unacceptable in principle should be addressed strategically and holistically rather than at through ad hoc project-level assessments which would be constrained by already-initiated strategic commitments and which may also be insufficient to properly address environmental issues that are related to strategic issues and cumulative impacts. <p>The Strategy and Master Plan should be revised accordingly to ensure that any significant impacts are avoided or suitably mitigated.</p>
Damage or disturbance to benthic habitats			
Para. 93, page 83	Other impacts could affect sea grasses and other benthic habitats in the SAC. These potentially include increased turbidity and changes in water quality. The significant effects would depend on the extent of the works.	<p>The AA does not state which projects could cause these impacts.</p> <p>These projects may also include those which would increase marine activity, infrastructural projects and other site-specific interventions such as port/harbour improvements, increased number of passenger ferries, etc.</p>	<p>The AA needs to be updated to address these issues.</p> <p>The Strategy and Master Plan should be revised accordingly to ensure that any significant impacts are avoided or suitably mitigated.</p>

6.1.2.3 - Marine SAC Il-Bahar tal-Lbic ta' Malta			
Disturbance to seabird ecology			
Para. 94, page 83	Potential impacts on breeding seabirds and seabird ecology as a result of increased activity at the port of Marsaxlokk.	<p>The AA states that project level assessment should be carried out to determine such impacts. However, the AA bases its comments by focusing solely on increased activity within the port of Marsaxlokk.</p> <p>The AA needs to review the physical developments and other site-specific interventions in the port of Marsaxlokk, in particular the breakwater, extension of terminal 2, dredging, new fuel station (not for ships), upgrading of South Road, reclamation of land for new tanks/jetty expansion and the development which would involve expansion outside of the site boundary.</p>	<p>The AA study needs to be more in depth in terms of the evaluated impacts of specific infrastructural and development projects in the Master Plan, both individually and cumulatively.</p> <p>The Strategy and Master Plan should be revised accordingly to ensure that any significant impacts are avoided or suitably mitigated.</p>
6.1.2.4 - Terrestrial SAC/SPA: Rdimijiet ta' Malta: Ir-Ramla tac-Cirkewwa s ail-Ponta ta' Benghisa			
Disturbance to Annex I habitats			
Para.95, page 84	The replacement of the radar at Dingli cliffs could result in overspill effects that could impact the nearby protected habitats.	<p>The AA should specify a requirement for project-level assessments.</p> <p><i>Chiroptera</i> are to be included in the assessment, as roosts of <i>Myotis punicus</i> and <i>Rhinolophus hipposideros</i> are present in this SAC.</p>	The AA should be updated to address these issues.
Disturbance to seabird colonies			
Para. 96, page 84	Possible negative impacts on birds from construction and suggests that appropriate measures are put in place.	The AA should identify what mitigation measures would be appropriate.	<p>The AA should be updated to specify what possible types of mitigation measures would be appropriate.</p> <p>The Strategy and Master Plan should be revised accordingly to ensure that any significant impacts are avoided or suitably mitigated.</p>
Terrestrial SAC: Wied Harq Hammiem			
Section 6	Issue not addressed/highlighted in the AA study.	<p>Wied Harq Hammiem is environmentally significant in view of its ecology, geomorphology and hydrology and is a designated SAC. The valley is characterised by garrigue/rocky steppe and watercourse habitats and is a valuable natural zone within an otherwise urbanised area.</p> <p>The 4 priority road projects regarding the upgrading of the TEN-T network include the stretch of the road from White Rocks Complex to Manuel Dimech Bridge at St. Andrew's, which abuts Wied Harq Hammiem. It is unclear</p>	Section 6 of the AA study needs updating to take into account the possible impacts of the proposed road upgrading works, including the underpass at this location, on the Wied Harq Hammiem SAC. Further details regarding the design and siting of such works should be provided for further assessment. ERA has already requested that the impacts of the proposed underpass on the SAC should be considered as part of the AA study for the Paceville Master Plan. Project-level assessment may also be required.

		whether the underpass along this stretch of the road, or any proposed widening of such road, could have an adverse impact on the SAC. ERA has already highlighted this concern to the Planning Authority as part of the consultation process on the Paceville Master Plan.	
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- 2.6 The Master Plan includes various other proposals which by their nature or land requirements may result in significant impacts on SACs/SPAs, depending on their siting, location and mitigation of operational impacts. These proposals include off-street parking areas, infrastructural works related to cycling corridors between villages, the proposed LNG and CNG refuelling stations, etc. **The AA report should be revised to take this issue into account. In particular, Section 6.2 “Mitigation” of the AA report should be revised to cover these types of projects in addition to road projects.**
- 2.7 **Moreover, the Master Plan needs to clearly highlight that these proposals would require environmental screening at project stage, which may also include separate project-level AAs.**

Impacts on protected sites: beyond the Master Plan 2025

- 2.8 The AA identifies significant impacts on SACs/SPAs beyond the Master Plan period (2025), as follows:
- significant negative impacts on the SACs of the Ghadira Area, Wied il-Mizieb and Is-Simar from the TEN-T projects at Ghadira, Mellieha and Xemxija Bypass, Xemxija (projects nos. 21 and 22); and
 - significant negative impacts on breeding birds, natural habitats and the natural environment (marine and terrestrial) at Comino and Il-Bahar ta' Madwar Ghawdex and Il-Bahar fil-Grigal ta' Malta from the proposed Malta-Gozo link (project no. 10). Government is still considering the feasibility of such fixed link, although the options under consideration are a bridge/s or a tunnel. The construction of either of these options could also have a significant impact on terrestrial protected sites.
- 2.9 **These are the most impacting and environmentally-contentious road projects in the Master Plan**, which are planned to be implemented outside the timeframe of the Master Plan 2025. These projects will be included in the next Master Plan beyond 2025 which will also be subjected to a separate SEA and AA study.
- 2.10 **ERA recommends that the Master Plan 2025 should be revised to clearly highlight the significant impacts of these projects on SACs/SPAs. The Master Plan 2025 should state that there is no commitment on the acceptability of these proposals, which would depend on separate strategic assessments of their environmental impacts including impacts on SACs/SPAs. Strategic alternatives need to be assessed holistically to determine whether such proposals could be considered further as part of the next master planning process or otherwise.**

Cumulative impacts on the coastal/marine environment

- 2.11 ERA considers that the cumulative impacts of several projects in the Master Plan in combination with other projects which would also affect the same protected habitat and marine SAC “Zona fil-Bahar fil-Grigal ta’ Malta” were not considered in the AA study. The AA only highlights the major negative impacts that the Master Plan would have on *Posidonia* meadows and benthic habitats within the marine SAC, mainly as a result of interventions at Mgarr and Cirkewwa harbours. However, there is no reference to how the protected habitat and marine SAC could be adversely affected cumulatively through various piecemeal projects and separate policy proposals, such as the Paceville Masterplan.
- 2.12 The Transport Master Plan, for example, proposes additional ferry landings along the coast, the Paceville Masterplan proposes several coast interventions including land reclamation and there are concurrent planning applications for the addition of a cruise liner berth and yacht marina extensions at Mgarr harbour which were not taken into account in the AA study. The AA should consider the extent that the marine SAC “Il-Bahar fil-Grigal ta’ Malta” could be adversely affected cumulatively and holistically. One example is to assess if permanent changes to hydrographical conditions could occur as this could affect habitats well beyond the site subject to particular interventions.
- 2.13 **ERA recommends that the AA study should be updated to consider the potential cumulative effects on protected sites, as specified in Note 1 of ERA’s Terms of Reference. Major projects or policy proposals which are beyond the scope of the Transport Master Plan should also be taken into consideration.**

Mitigation measures

- 2.14 **It is recommended that Section 6.2 of the AA study regarding Mitigation should also make reference to compensatory measures which may be required as per the EU Habitats Directive and the Flora, Fauna and Natural Habitats Protection Regulations of 2006 (S.L. 549.44).**

3. SEA Environmental Report

- 3.1 The Environmental Report is an important step in the SEA process to ensure that any potential significant environmental impacts of the emerging Transport Strategy 2050 and Master Plan 2025 are avoided or suitably addressed at an early stage. In accordance with Regulation 9 of the SEA Regulations of 2010, **it is recommended that ERA’s comments and the mitigation measures and recommendations in the Environmental Report² are taken into account in the revised final Transport Strategy and Master Plan**, as well as in any other future plans emerging from the Strategy or the Master Plan.
- 3.2 ERA’s comments on the Strategy, the Master Plan and the SEA Environmental Report are provided below.

² Report prepared by Adi Associates Environmental Consultants Ltd, dated 6th October 2016.

4. National Transport Strategy 2050

Strategic Goal 1 - Transport to support economic development

- 4.1 The Environmental Report, in Table 7.2, states that transport infrastructure supporting economic development could have significant adverse impacts on biodiversity and the marine environment, as well as impacts on heritage and the landscape. Whilst agreeing with this statement, ERA considers that these impacts cannot be solely or entirely mitigated through EIAs and project-level AA. Proposals for transport infrastructure, which also support economic development, are already considered in detail in the Master Plan and assessed through SEA and plan-level AA. Therefore, the way forward is to ensure that infrastructural projects or works required to implement this Strategic Goal (and possibly other Goals too), should only be considered further through the master planning process.
- 4.2 **ERA recommends that the proposed mitigation measure in Table 7.2 of the Environmental Report should be amended so that future transport infrastructural projects emerging from the National Transport Strategy are first addressed in detail as part of a Master Plan which in turn should be subjected to an SEA and/or AA as relevant.** This would ensure that such infrastructural projects are considered strategically, holistically and cumulatively within the context of a Plan prior to any decisions on *ad hoc* projects or site-specific commitments that would then be difficult to address once in-principle commitments have already been established at plan level. Alternatives need to be considered strategically as part of the plan-level assessment process.

Strategic Goal 2 - Transport to promote environmental and urban sustainability

- 4.3 **ERA requests revisions to the text describing the mitigation measure to address impacts on Biodiversity, mainly to clarify that the EIA process is not necessarily the most appropriate or the only environmental assessment tool available** to “ensure that the integrity of the areas of interest and associated species populations will not be significantly negatively affected”.

Strategic Goal 3 - Transport to support social development and inclusion

- 4.4 It is noted that this strategic goal could have adverse impacts on biodiversity, soil, heritage and landscape. Reference to the need for planning permission and related assessments is also noted. However, **ERA recommends that the proposed mitigation measure in Table 7.2 of the Environmental Report should be amended so that future transport infrastructural projects emerging from the National Transport Strategy are first addressed in detail as part of a Master Plan which in turn should be subjected to an SEA and/or AA as relevant.** This would ensure that such infrastructural projects are considered strategically, holistically and cumulatively within the context of a Plan prior to any decisions on *ad hoc* projects or site-specific commitments. Alternatives need to be considered strategically as part of the plan-level assessment process.

5. Transport Master Plan 2025

Alternatives and shortlisted projects

- 5.1 The Transport Master Plan has considered 4 scenarios in developing the plan's measures, as follows:
- Scenario 1: "Do nothing": no changes to the network or implementation of any transport related actions;
 - Scenario 2: "Do minimum": minimum expected changes and those committed developments. It includes all the recently implemented and committed developments from the base-year (2014) to 2020;
 - Scenario 3: "Do-something 1": moderate restraint in the use of private cars and increased support of public transport; and
 - Scenario 4: "Do-something 2": stronger restraint in the use of private cars and strong support to public transport.
- 5.2 The assessment of alternatives in Chapter 6 of the Environmental Report concluded that the "Do nothing" and "Do minimum" scenarios provide the least opportunity to improve the environmental situation. Although these scenarios do not entail substantial transport-related projects, the important measures in the Strategy and Master Plan promoting improvements in terms of air quality, climate change, population and human health will not be implemented. ERA notes that the "Do nothing" and "Do minimum" scenarios are not possible since no or little intervention will continue the trend of increased traffic congestion and lack of regulation in the sector.
- 5.3 Scenario 3 and scenario 4 were considered in further detail, both in the Master Plan and the SEA Environmental Report. Scenario 4 was regarded as the most sustainable option. Although the impacts on biodiversity, landscape and heritage are expected to be negative in both scenarios, scenario 4 ("Do-something 2") is expected to have the least adverse impacts since it includes less infrastructural projects for implementation during the current Master Plan period up to 2025.
- 5.4 The Master Plan considers a total of 29 projects for the upgrading of the TEN-T road network, including the Malta-Gozo Fixed Link. The feasibility study of the options that Government is considering for the Fixed Link is still pending and therefore, no further details were provided at this stage. All 29 projects were assessed to determine their prioritisation. 6 projects were shortlisted as priority for the current Master Plan period up to 2025 (see Table 2).

Table 2: shortlisted road projects

Project title	Scenario 3 ("Do-something 1")	Scenario 4 ("Do-something 2")	Comments
Addolorata Junction (Phase 1 & Phase 2), Marsa	✓	✓	Considered as committed
Kappara Junction, Kappara	✓	✓	Considered as committed
December 13th Road, Marsa	✓	✓	New
Regional Road, Msida	✓		New
Blata l-Bajda to Valletta	✓		New
White Rocks Complex to Manuel Dimech Bridge, St. Andrew's	✓	✓	New, including underpass in the Paceville Masterplan.

- 5.5 The Kappara Junction project is covered by a development permit. The project has been subjected to an EIA and an Appropriate Assessment (AA) procedure in view of its impacts on the environment and the Wied Ghollieqa SAC respectively. The detailed proposals for the upgrading of the Addolorata Junction are also in progress.
- 5.6 Both Scenarios 3 and 4 include common proposals for:
- increase average speed of public transport;
 - improve ferry services;
 - implementation of a cycling corridors;
 - low emission zone in the Hub;
 - promotion of multiple occupancy; and
 - provision of road infrastructural projects.
- 5.7 However, Scenario 4 (“Do something 2”) makes provision for 2 cycle corridors rather than one and in addition it only promotes a moderate level of road infrastructural projects up to 2025 (4 rather than 6 projects). Moreover, Scenario 4 also makes provision for a fast ferry service and a freight ferry service between Malta and Gozo.

Road transport: within 2025

- 5.8 The Master Plan includes 4 TEN-T projects in the option “Do Something 2”. Strategically, ERA has no comments on the projects at the Addolorata Junction, the Kappara Junction, and December 13th Road at Marsa. ERA will review these proposals at project stage. **With respect to the White Rocks Complex to Manuel Dimech Bridge at St. Andrew’s, ERA’s comments on the AA section above apply (see Table 1 above).**

Road transport: beyond 2025

- 5.9 The following are a list of projects where **significant impacts on the natural environment, protected habitats and SACs/SPAs are likely to occur**:
- redesign to address conflicting road function (high traffic volume and high urban activity area) at Ghadira, Mellieha (project no. 21);
 - removing bottleneck and functional conflict between high traffic volume and urban activity at Xemxija Road - Xemxija Bypass, Xemxija (project no. 22); and
 - Malta-Gozo Fixed Link, the feasibility of which is still being considered by Government (project no. 10).
- 5.10 The conclusions of the AA study and ERA’s concerns on these three project proposals are already highlighted in the AA section above. Considering the sensitivity of the affected environments, these projects are expected to have significant impacts on the environment and protected sites. **In addition to their adverse effects on SACs/SPAs, these projects are also expected to have significant impacts of the landscape, the rural character and the physical environment of sensitive and important environmental areas beyond the boundaries of SACs/SPAs.**
- 5.11 ERA is concerned that even though the SEA and AA reports identified that these projects would have significant environmental impacts, their inclusion in the Master Plan 2025 may be perceived or understood as an in-principle commitment for the implementation of such projects. These 3 TEN-T projects

are likely to give rise to overriding environmental concerns. **ERA's recommendation on these projects (see above) is being reiterated in respect of the SEA process.**

- 5.12 Other proposed road projects beyond 2025 include interventions to various stretches of Tal-Barrani Road, the alternative link from Victoria to ferry port through Nadur, Mriehel Bypass, Link from Tal-Barrani to Smart City, upgrades to Regional Road and Marsalforn Road from Victoria, etc. The details of these proposals should be considered as part of the SEA of the next Master Plan once more details are available.

Public transport

- 5.13 Generally, ERA welcomes the proposals that the Master Plan puts forward as alternatives to the use of private cars. However, strategically there are concerns regarding the location of particular Park and Ride facilities in rural areas. The new Park and Ride facility at the periphery of Zabbar is an example. The land requirement for these facilities is substantial and therefore, their impacts in terms of take up of undeveloped land, site formalisation, loss of rural character and proliferation of built development could be unacceptable from an environmental point of view.
- 5.14 **It is recommended that the Master Plan should be revised to clearly state that the site selection exercise for new Park and Ride facilities, as recommended in the Environmental Report, should be carried out holistically prior to the submission of *ad hoc* proposals for individual Park and Ride facilities. The site selection exercise should be carried out in consultation with ERA.**

Intermodal transport

- 5.15 Improvement of ferry landing places and new landing places could be of significant concern as mentioned in the Environmental Report. The Report highlights that St. Paul's Bay and part of St. Julian's coastline lie within a marine SAC and thus these new landing facilities could result in negative impacts on the marine environment as well as biodiversity. **ERA's comments above regarding AA and the impacts on the marine SAC apply.**

Maritime transport

- 5.16 As mentioned in Table 7.6 of the Environmental Report, the improvements in internal maritime which includes upgrading works to the Mgarr and Cirkewwa harbours could have negative effects on the biodiversity, water and landscape. **ERA's comments above regarding AA and the impacts on the marine SAC apply.**
- 5.17 In the case of Mgarr harbour, there is a distinction between southward expansion beyond the main breakwater and eastward expansion on the Zewwieqa side. Both would have adverse impacts, however ERA has already indicated to Transport Malta (in relation to the cruise liner project, but also with passing reference to any required harbour expansion in general) that in principle:
- southward expansion (beyond the main breakwater) is the least damaging option and therefore may be considered further, as long as there is a clear net benefit that outweighs the adverse impacts and that

such proposals are still subject to the relevant environmental assessment processes; and

- expansion on the Zewwieqa side is an upfront non-starter, in view of the sensitive coastal landscape and the likely need for even more intensive coastal modification.

Other environmental considerations

Air Quality

- 5.18 Malta's obligations under the Air Quality Acquis extend beyond compliance with the limit values in the ambient air quality directive. In addition to these obligations, Malta is required to comply with ceilings (total amount of pollutant emitted in kt) under the Gothenburg protocol and under the revised National Emissions Ceilings Directive. The former will have to be achieved by 2020 while the NEC ceilings will have to be achieved by 2030.
- 5.19 CO₂ is not an air quality indicator so it should be removed from the air quality indicators and added to the climate change indicators in the Environmental Report. PM_{2.5} should be added to the air quality indicators.
- 5.20 In addition to compliance with the limit values for ambient air quality, Malta is also obliged to comply with the Gothenburg Protocol Ceilings for 2020 and the National Emissions Ceilings Directive ceilings for 2030. The ceilings being as follows: 4.7kt NO_x by 2020 (for all the sectors including power, road transport etc.) [this will be lowered to 1.9 kt by 2030] and 0.98 kt PM_{2.5} by 2020 [to be lowered to 0.24 kt by 2030].

Port of Valletta

- 5.21 As mentioned in Table 7.7 of the Environmental Report, ERA considers that the improvement of the wave climate in the harbour, new cargo infrastructure in the port of Valletta and deep water quay could have negative effects on the biodiversity, seawater quality, climate and landscape. These projects would need to be assessed in view of their environmental impacts once more details are available.

Infrastructure

- 5.22 The Master Plan 2025 contains various proposals which may have environmental impacts. However, the significance of such impacts depends on various factors, such as their numbers and/or site location. Strategically, ERA is concerned on the possible cumulative impact that these proposals (and any additional consequent development that may be triggered or facilitated as a result) may have on the environment such as take up of additional undeveloped land, loss of soil, proliferation of buildings in the countryside, site formalisation and potential commitment for future development pressures in rural areas. These projects are as follows:
- provision of off-street parking facilities;
 - LNG refuelling stations along the TEN-T road network;
 - CNG refuelling stations along the TEN-T road network;
 - Pedestrian Infrastructure Plan and a Cycling Strategy: infrastructural requirements; and
 - cycle corridors between villages: infrastructural requirements.

5.23 In this regard, there should also be a clearer distinction between urban and rural contexts, with a more minimalistic approach in rural areas where such interventions would unnecessarily formalise the rural landscape and intensify conflicts with the surrounding countryside and coast.

Marine environment

Reference Page	Section	Reference Text	ERA comments
Page 19	SEA Environmental Objectives and indicators (Table 3)	The criterion “ <i>Affect the achievement of Good Ecological Status of coastal waters and Good Environmental Status of marine waters beyond protected areas (as per Water Framework Directive and Marine Strategy Framework Directive requirements respectively)?</i> ”	It is noted and agreed with. It is also presumed that the when assessing potential effects in terms of indicator ‘ <i>quality of the marine environment in terms of biological and physico-chemical elements</i> ’ all elements covered by the two Directives, including biological elements, hydrographical conditions and physico-chemical conditions would be considered. However, freshwater in terms of surface inland waters delineated for WFD purposes should also be included with this indicator. Note that these waters are also not included in the indicators provided for the water issue.
Page 61	The SEA Baseline: Biodiversity		The SEA baseline should refer to the status of inland and coastal water bodies delineated/designated for the purpose of the WFD, against which the effects of the plan can be assessed (reference should be made to the second Water Catchment Management Plan). It is also important to stress the need to achieve Habitats Directive, WFD and MSFD objectives for biodiversity.
Page 103	Paragraph 151 and 152		Reference should be made to current objectives and status for these water bodies in accordance with the second Water Catchment Management Plan. Note that the inland surface waters have been delineated for the purpose of the WFD and not designated. However the objectives set by the WCMP for such waters should not be compromised by the plan – hence the importance of acknowledging the current status of water bodies against which the effects of the plan can be assessed.
Page 157	Table 7.2		While understanding that the assessment is being undertaken at a very strategic level and details of mitigation measures cannot be provided, it is deemed important to refer to the need to consider the objectives of the WFD and MSFD for inland and marine waters in terms of biodiversity, also at this strategic level. For example, it is important that the plan should be devised in the knowledge of the need to maintain or achieve Good Ecological Potential in harbour areas, or prevent deterioration in water bodies in line with Article 4.7 of the WFD. Therefore even at a strategic level, the mitigation

			measures could propose alternative solutions for achieving the strategic goals for transport in the marine environment.
Page 177	Assessment of Operational Objective 2.2.3		In relation to water SEA objectives, the siting of the parking facilities should also take into consideration potential effects on inland surface waters and run-off to the marine environment.
Page 200	Assessment of Operation Objective 2.4.2		In relation to biodiversity SEA objectives – reference should be specifically made to the need to consider effects related to hydrographical changes and effects on WFD water body status.
Page 210	Assessment of Operational Objectives 2.6.3 (harbour areas)		Recommendation to consider effects in relation to the achievement of 'Good Ecological Potential' with reference to Article 4.7 of the WFD.

DRAFT