



Non-Technical Summary (English) in Relation to the Proposed ex- Jerma Palace Hotel

As per ERA requirements for PA/00437/23

Report



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1 DESCRIPTION OF THE PROPOSED DEVELOPMENT

This Non-Technical Summary outlines the findings of the Environmental Impact Assessment (EIA) that has been undertaken in relation to the proposed redevelopment of the Ex-Jerma Palace hotel. The project, herein referred to as the “Scheme”, is located in Marsascala as shown in Figure 1. The Scheme is currently at Outline Development Permit stage (PA/00437/23).



FIGURE 1: AREAL IMAGE OF THE PROPOSED SCHEME SITE AND SURROUNDING AREA

1.1 PHYSICAL CHARACTERISTICS

The Scheme proposes the demolition of the ex-Jerma Palace hotel and the development of a mixed-use complex. The previous hotel has been abandoned for nearly 20 years and has fallen into a serious state of disrepair. The building and its peripheral facilities occupy a large percentage of the Scheme site.

The proposed scheme will have a total developable footprint of 17,570 m², 1,325 m² of the site shall be soft landscaped, 7,785 m² shall be hard landscaped, and the remaining 8,460 m² shall be occupied by the proposed new structures and facilities. The scheme will be separated into two blocks which together contain a 90 room 5-star hotel, supporting amenities including 2 spas, 146 residential apartments, retail outlets, food & beverage establishments and dedicated parking facilities of 330 spaces, 191 garages (Figure 4 to Figure 5).

The two blocks are referred to as the North and South blocks. Each block is 7-storeys high, with two basement levels proposed underneath. The majority of the facilities within the two blocks are similar; however, subtle variations are evident due to the slightly different shapes and sizes of each block.

The Scheme also incorporates the restoration of the foreshore through the construction of a boulder revetment surrounding the perimeter of the site. Safe access points and pathways are proposed on the foreshore which is currently closed off. A large pedestrian area is proposed between the complex and St. Tomas Tower, effectively closing off a section of Triq is-Salini for vehicular access. Vehicular routes along Triq is-Salini would be directed around the tower in an anti-clockwise direction.

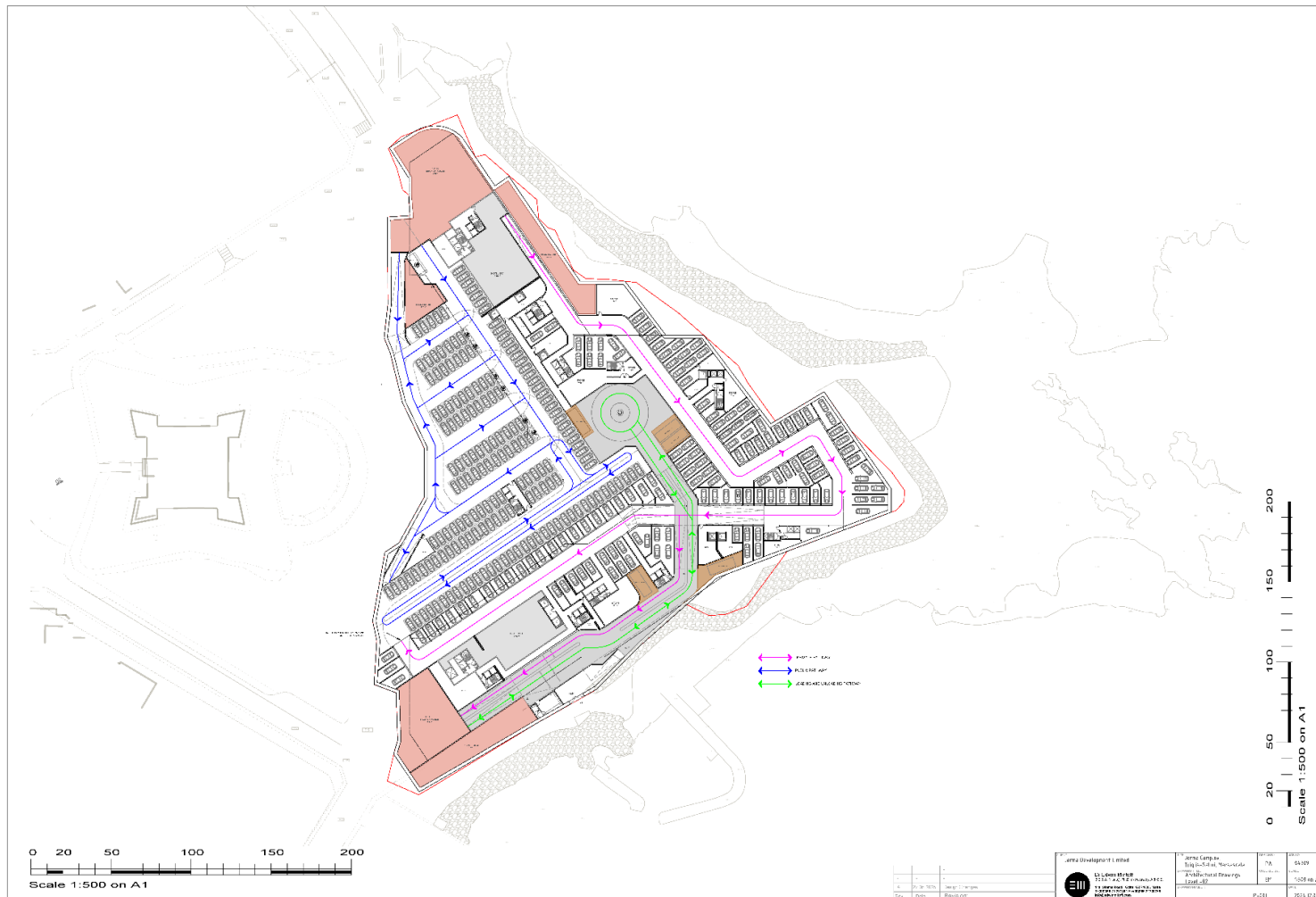


FIGURE 2: PROPOSED LEVEL -2 LAYOUT

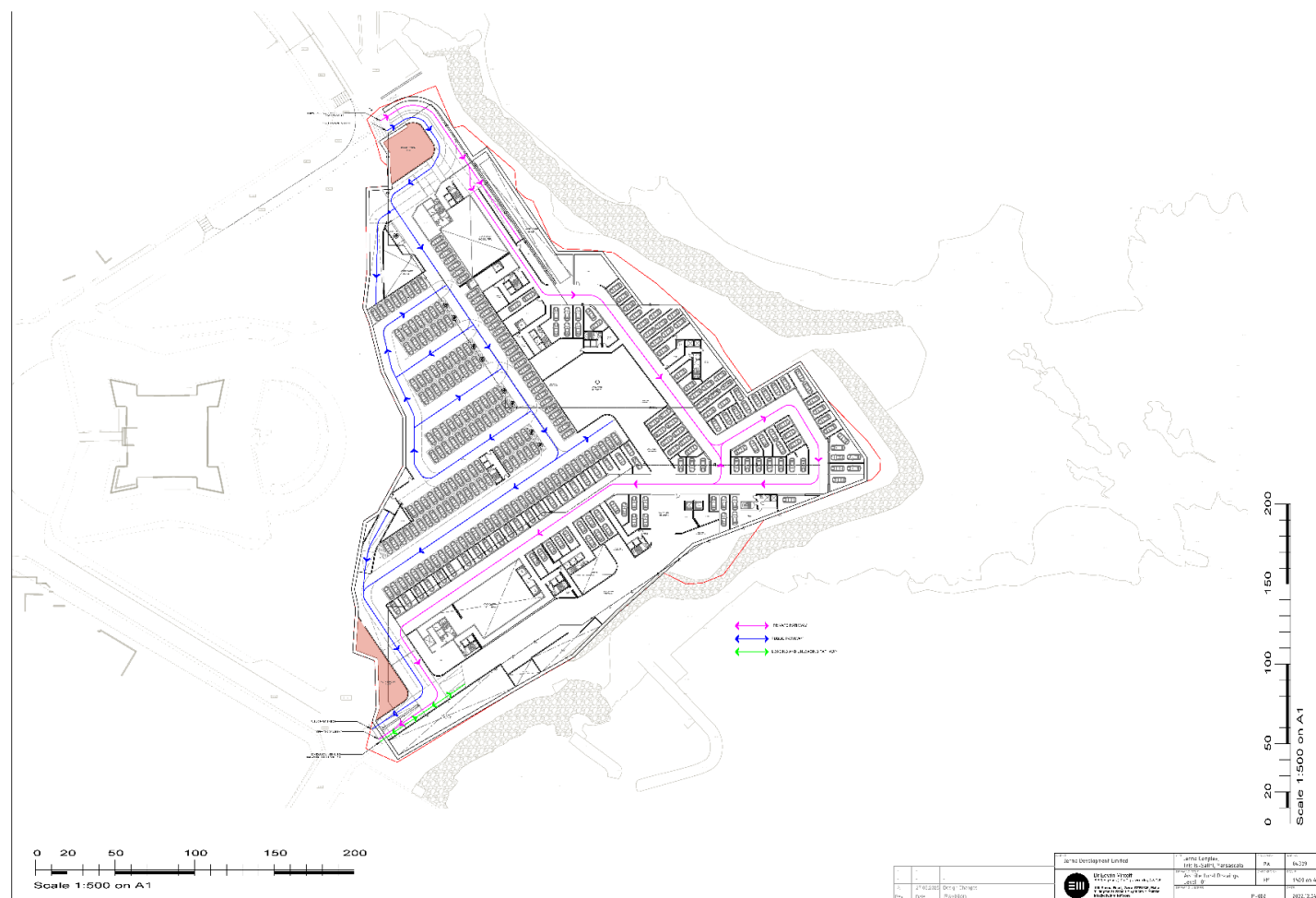


FIGURE 3: PROPOSED LEVEL -1 LAYOUT

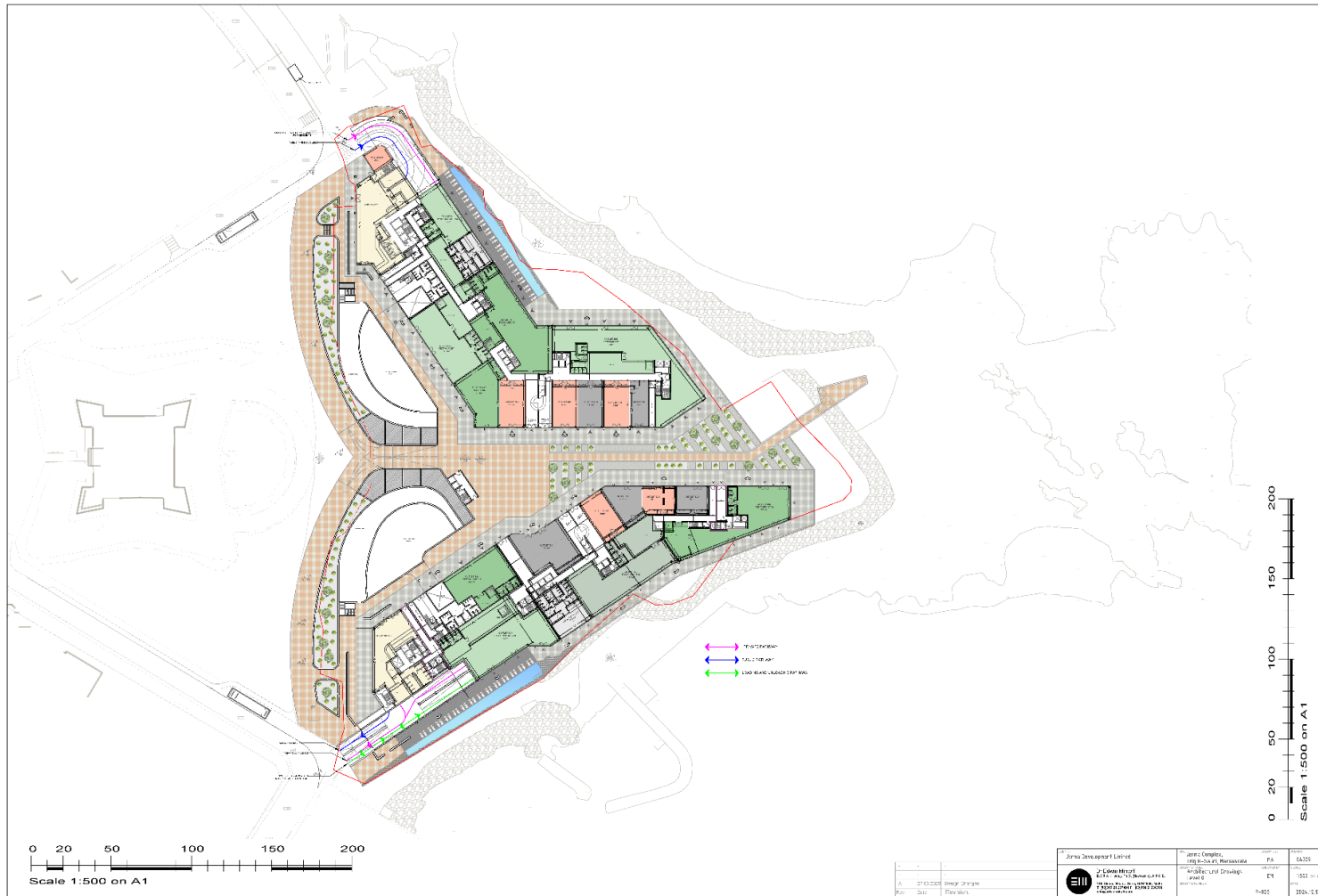


FIGURE 4: PROPOSED GROUND FLOOR LAYOUT



1.2 CONSTRUCTION WORKS

The construction works are anticipated to span over a 4-year period. Given the scale of the proposed scheme and the various buildings and components it comprises, the works will be undertaken in a phased manner. The phases will include the demolition of the existing derelict structure, excavation to facilitate two underground levels, and the construction and finishing of the above-ground development.

1.3 WASTE MANAGEMENT

Demolition, excavation and ground preparation works are expected to account for the majority of waste generated during the construction phase. About 30,000m³ of material is envisaged. Other waste streams generated from the construction activities may include construction material offcuts and packaging.

1.4 PROJECT OBJECTIVES

The site's prominent coastal location and sizeable footprint along the shoreline provides a prime opportunity for a redevelopment project of the current dilapidated building.

The need for and potential of such a project are clearly identified in the SOUTH MALTA LOCAL PLAN, and further elaborated on in the site-specific DEVELOPMENT BRIEF DOCUMENT, which sets out a strategic framework for the site's regeneration.

Moreover, the scheme intends to regenerate the area as a prominent feature of the urban coastline to promote the inclusion of tourist accommodation, residential units, commercial uses, and other activities considered compatible with the urban coastal context and the surrounding residential area.

Besides the current dilapidated palace serving as an eyesore to the area, the site is also of safety concern and blocks public access to the foreshore. The proposed scheme will enhance public access through the pedestrianisation between the foreshore, scheme and St. Thomas Tower.

2 ASSESSMENT OF ALTERNATIVES

2.1 LOCATION

Since the Scheme involves the redevelopment of the dilapidated ex-Jerma Palace Hotel, no other sites have been considered.

2.2 LAYOUT

The ex-Jerma Palace site has been subject to several redevelopment proposals since the closure of the original hotel in 2007. Five principal development proposals have been prepared for the site, all of which comprise a mixed-use tourist and residential complex. The key distinctions between the five alternatives relate to the overall development footprint, the extent of intervention within the marine environment, and the number, height, and density of the proposed buildings. The earlier proposals were considerably more ambitious in scale and intensity of development. Over time, successive revisions have significantly reduced the developable footprint, from approximately 146,700 m² in the 2013 proposal to 18,250 m² in the 2019 proposal, while also refining the design to achieve greater compatibility with the surrounding environment and landscape context.

2.3 DOWNSCALING

The redevelopment proposals for the former Jerma Palace Hotel have already undergone a clear and progressive reduction in scale over time. Earlier schemes were characterised by a significantly larger built footprint and more intensive massing of structures, whereas the current proposal adopts a more restrained and context-sensitive approach. Notably, the present Scheme does not include any marine interventions or the creation of an artificial perched beach. Overall, these iterative changes have resulted in a proposal that is more proportionate to its surroundings when compared to previous designs.

Many of these revisions can be attributed to the Planning Authority's Development Brief for the site, published in 2020, which established clearly defined parameters and thresholds that all subsequent design proposals were required to follow.

2.4 DO-NOTHING SCENARIO

If the former Jerma Palace site remains in its current condition, it will inevitably continue to deteriorate, with the structural integrity of the buildings progressively declining and the associated safety risks increasing over time. Prolonged neglect is likely to accelerate material decay, resulting in further instability and potential hazards to both the general public and the surrounding environment. Moreover, the current site is an eyesore and contrasts with the coastline reducing the appeal of the location for both tourists and local visitors.

Additionally, retaining the dilapidated state of the site goes against SOUTH MALTA LOCAL PLAN and the site-specific Development Brief local which mandates that the area is to be tourism-oriented incorporating residential and commercial elements, designed to be safe, environmentally sensitive and visually integrated within its surroundings.

3 LAND COVER AND LAND USES

The Scheme site is occupied by the derelict ex-Jerma Palace hotel building and its peripheral facilities. Salt pans are found along the edge of the eastern and southern coastal areas of the Scheme site. The remaining foreshore consists of undisturbed and rugged exposed limestone and concreted footpaths. Moreover, a small sea wall protrudes from the southern coastal boundary of the Scheme site. Patches of coastal garigue and disturbed ground are also present just outside the northern and southern scheme boundary, while the historical and scheduled St. Thomas Tower is located at the west. Residential properties dominate the surrounding areas while other land-uses include a sea-side promenade, pavements and roads are also present.

The construction works on site are expected to result in temporary impacts on the nearby land uses. The use of construction equipment, machinery, and site hoarding within the project site may partially restrict public access to the foreshore especially during summer months. Given that access is already restricted, such impacts are expected to be of negligible significance provided that the contractor maintains safe access to the foreshore. Construction works may also temporarily obstruct pedestrian pathways and necessitate alterations to vehicular routes. The movement of large construction vehicles may also contribute to increased traffic congestion within the surrounding areas. Through the implementation of a construction traffic management plans such impacts may be more effectively controlled.

The construction works are expected to result in temporary dust and noise minor adverse impacts on the nearby land uses especially during demolition activities. Moreover, construction works may result in marine pollution through the accidental spill or leakage of fuels, chemicals, waste materials, and other hazardous substances. Dust-generating activities may also give rise to turbid plumes in the marine environment through surface water runoff. These moderate adverse impacts could reduce water quality and adversely affect marine life through ingestion, entanglement, or reduced biological productivity. The significance of such impacts can be reduced if the Contractor follows good working practices on site.

During the operational phase, the scheme will revitalise the area for tourists and residents promoting year-round activity and improve the attractiveness of the locality. This regeneration consistent with local planning frameworks and is therefore expected to be of a major beneficial impact. The proposed scheme is to restore public access to the foreshore reintroducing recreational opportunities within the coastal area. Such operational are expected to be major beneficial on the surrounding land and coastal use. Moreover, the accessibility to the foreshore may bring about an increase sea-use which is considered to be a moderate beneficial impact. However, the intensification of land use activity is expected to increase traffic and noise in the currently quiet residential area resulting in a minor adverse impact to land uses and negligible impact to sea-uses if appropriate operational management measures are implemented. The operation of the complex may cause minor adverse effects of marine pollution from runoff and litter. With appropriate management measures, the impact would be negligible.

4 LANDSCAPE CHARACTER AND VISUAL AMENITY

The study assessed a total of 10 viewpoints to determine the existing visual amenity conditions at:

- VP1: Triq Dawret it-Torri, M'Scala
- VP2: Triq is-Salini, M'Scala
- VP3: Triq ir-Ridott, M'Scala
- VP4: Coast off Triq is-Sikka, M'Scala
- VP5: Munxar Hill, M'Scala
- VP6: Triq Xrobb l-Ghagin, Delimara
- VP7: Triq iz-Zonqor, M'Scala
- VP8: Triq Hurds Bank, M'Scala
- VP9: Triq Sant'Anna, M'Scala
- VP10: Triq iz-Zonqor, M'Scala

The severity of construction impacts varies by proximity of the viewpoint to the site and the extent of existing screening. Across most viewpoints, excluding VP6, VP8, and VP9, construction-related components such as site hoarding, scaffolding, construction vehicles, material storage areas and active machinery are expected to be clearly visible such impacts are expected to be of major adverse significance.

Viewpoints 6 and 8 are distant from the scheme and surrounded by high structures which partially obstruct the view of the scheme. Only, upper-level construction works and tower cranes are likely to be visible from these two viewpoints. Such impacts are expected to be of moderate adverse significance. No impacts are anticipated for VP9 as the scheme is fully screened at ground level with upper-level construction works being intermittently visible.

During the operational phase, the scheme will be visible from a range of viewpoints. Owing to its increased massing and height exceeding that of the immediate surrounding context, the upper levels of the building will remain a consistent feature within the skyline. However, the design of the scheme reduces such visual impacts through the implementation of setbacks, recessed areas and open spaces.

Given the proximity of VP1 to the scheme the proposed openness and spatial quality through connections towards the sea and a central public place will serve as a minor beneficial impact compared to the current dilapidated building. Conversely, given the considerable distance of VP6 from the scheme, the existing dilapidated building is not readily perceptible yet the increase in building height and massing is therefore resulting in minor adverse visual impacts. The increase in scale of the scheme is more readily perceived at Viewpoints 2, 4, 5, 8 and 10 however the current building's deteriorated condition is not clearly perceived due to either distance and/or partial obstruction and therefore the improvements overall moderate adverse impact.

At VP3 and VP7, the scheme will be very visible for the majority of the view extent of each viewpoint. Given that increased visual appeal of the proposed scheme minor

adverse impacts are expected given the implementation of receded areas, setbacks and landscaping on the ground floor level.

In the case of VP9, the proposed scheme fully obstructed by the built-up coastline and large vessels therefore having negligible visual impacts.

The increase height and massing of the overall development is expected to result in changes in shadowing during certain times of the year and increased exterior lighting especially for adjacent public spaces and nearby residential areas. However, given the orientation of the site, the surrounding open coastal context, and the incorporation of setbacks and open spaces within the design, such impacts are anticipated to be of minor adversity.

5 GEOLOGY, GEOMORPHOLOGY, HYDROGEOLOGY AND SOILS

The site lies at the foot of a hill slope terminating at the shore platform that lines the coastline. The shore platform runs from Il-Ponta Tal-Mignuna northward for about 250m and interrupted by a fault. The coastal foreshore is characterised by rock-hewn salt pans.

The study area is underlain primarily by Lower Coralline Limestone and Middle to Lower Globigerina Limestone formations. Although Blue Clay, Greensand, and Upper Coralline Limestone occur regionally, these units are absent within the study area. Soils are generally disturbed, except along the undeveloped foreshore. The site lies within a Mean Sea Level aquifer water protection zone, with surface runoff originating upstream and conveyed via the road network before discharging at the coastline.

Excavation works will result in a considerable volume of 25,557m³ to be extracted and is expected to be of major adverse impact. Moreover, construction works will degrade or completely destroy soil present at shore platform however given that most of the scheme area is built-up the quantities are insignificant resulting in a negligible adverse impact. Given the scheme involves the re-development of an existing site, the geomorphology has already been significantly altered in the past. Therefore, the proposed excavation will further alter the geomorphology resulting in a minor adverse impact.

Moreover, the risk of damaging saltpans is apparent during both construction and operational phases. During the construction phase activities may lead to the accidental damage of the salt pans. During the operational phase salt pans would be easily accessible to the general public and visitors increasing the risk of damage and alterations in the geology. These impacts constitute to a minor adverse impact for both construction and operational phases of the scheme.

Accidental spills of fuel, lubricants, oils, and other chemicals during the construction phase, as well as sewage leakages or other discharges during the operational phase, may occur. Such incidents could adversely affect the hydrogeological conditions of the site and its surrounding area and are therefore considered to result in a moderate negative impact in both construction and operational phases of the scheme.

To mitigate environmental impacts, construction activities should comply with environmental regulations and best practices, including the proper storage of liquids, soil preservation, and effective site management. Excavation waste and surplus soil should be reused or recycled where feasible, and salt pans should be protected from damage and contamination. During operation, regular monitoring of effluents and liquid storage facilities is recommended. Continuous monitoring and maintenance will also be required to minimise rock face instability.

6 WATER BODIES

The site receives rainwater from higher ground, primarily from a conical hill located upstream. The road network influences the direction of water flow, which eventually reaches the coastline and disperses along the shore. The scheme is located on Malta's Mean Sea Level Aquifer which is saturated with seawater due to cracks in the limestone.

The construction phase is expected to result in various impacts such as dust-generating activities, accidental spillage of construction chemicals and contaminated run off through concrete contaminated wash-water. Such contaminants may penetrate into fissures of the underlying limestone and enter the Mean Sea Level Aquifer and/or end up in the sea. Such construction activities constitute to a moderate adverse impact.

During operation, potential impacts include accidental leakage of sewage water, contaminated run off from parking or trafficked areas and fatty and soapy liquids from catering and other operational facilities. Such impacts are expected to be moderate adverse especially since the scheme will involve the increase in impermeable surfaces which will may accelerate surface run off. Moreover, the increase of human activity will bring about an inherent risk of littering or accidental spills of waste which could end up in coastal waters, due to its temporary and reversible nature, this impact is considered of minor adverse significance.

Since the scheme is located by the coast, major storm events are not to be ruled out, particularly in relation to the integrity of drainage, wastewater and below-ground infrastructure. However, due to the low likelihood of such temporary events to occur the impact from storm-events is expected to be of minor adversity.

Mitigation measures will reduce the identified impacts, provided that the contractor and/or operator implements appropriate controls, including the safe storage of chemicals, proper containment of concrete and cement wash water, and the control of dust and fine excavation material. During operation, wastewater and runoff will be managed to prevent pollution, while measures will be maintained to protect coastal infrastructure and water quality.

7 TERRESTRIAL ECOLOGY

The scheme site is characterised by a coastal urban environment together with a natural foreshore containing saltpans, patches of coastal garigue, disturbed ground and cultivated plants and trees. Approximately 66 trees were recorded in the study area, 16 of which were found within the scheme site.

The project will involve the uprooting of approximately 16 individual trees, 10 of which are protected specimens. Given the small scale yet permanent nature of the associated habitats and vegetation loss, the ecological impact is considered moderate adverse.

The removal of soil will cause further habitat loss and soil-associated species. These features provide feeding, shelter and breeding opportunities and contribute to the ecological diversity of the site. However, an insignificant amount of soil is anticipated to be removed and be re-used for soft-landscaping the overall impact is negligible.

Although no bats were recorded within the study area, the dilapidated building may provide potential roosting opportunities. Consequently, the demolition of ex-Jerma site is considered to constitute a moderate adverse impact.

Dust-generating activities during the construction phase are likely to produce temporary spillover effects through wind-borne dust particles and surface run off to the surrounding coastal area and patches of vegetation. Such negative impacts are further magnified by already harsh saline environment. Surface run off could end up in the sea altering the functioning of photosynthetic plants and the overall health of the marine ecosystem. Such negative impacts are expected to be moderate adverse.

Lighting impacts during the construction phase are unlikely, as no nighttime works are envisaged leaving only emergency and safety lighting. Such lighting is considered limited and any effects on the surrounding ecology are considered negligible.

Moreover, noise and vibration is expected during the construction phase, which can deter fauna and potentially permanent displacement of species in the long-term resulting in a minor to moderate adverse impact.

During the operation, the anticipated increase in human reactional activity is predicted to lead to increases in light and noise pollution. Light impacts are expected to be of minor to moderate impact while noise pollution expected to result in minor adverse impacts. Moreover the proposed increase in height and massing is expected to result in an increase in shading. However, such shadowing would only be incremental and affecting predominantly disturbed, developed or sparsely vegetated areas. Therefore, the impact is expected to be negligible.

A range of measures is proposed to reduce these impacts. During construction, site hoarding, wheel-washing facilities, dust suppression and appropriate management of surface water will help protect surrounding coastal and marine habitats. Construction

activities, tree removal, transplantation and replacement planting should also be appropriately monitored. During operation, unnecessary night-time lighting should be avoided, with luminaires carefully positioned and shielded to minimise light spill. These measures will reduce the severity of the identified impacts. Moreover where practicable, suitable trees will be transplanted, while compensatory planting will introduce native and ecologically appropriate species in accordance with ERA requirements. Extensive landscaping will also help restore habitat within the completed development.

8 AVIFAUNA ECOLOGY

During the construction phase, the increase of noise, vibration and dust will be of a nuisance to avifauna especially since works will overlap breeding seasons of certain terrestrial species. This will result in the disturbance or loss of the breeding territories. Moreover, foraging areas will be temporarily reduced and bird species currently making use of the surrounding coastal and marine environment to rest and forage during migration will be affected. The works are therefore expected to be of a moderate adverse impact on avifauna.

The redevelopment of the site will result in the permanent loss of terrestrial breeding birds within the footprint of the development. The increase human activity associated with the mixed-use commercial development will also contribute to the degradation and/or direct loss of bird habitats resulting in an overall moderate adverse significance. Moreover, migrating birds, some of which are of conservation concern, will also be impacted by direct habitat loss which is expected to be of moderate to major adverse significance.

Should night-time construction works be undertaken, and during periods of night-time operation, the scheme would generate Artificial Light at Night (ALAN). Due to the exposed location of the development and its direct line of sight with marine SPAs, light impacts are expected to be major adverse on breeding seabird species. Moreover, ALAN would significantly impact nocturnally migrating birds passing within the study area of the site resulting in a moderate adverse impact.

Given the exposed position of the site to wind and high waves, the risk of waste material such as dust and micro/macro-plastics to end up in the sea is likely which would result in a moderate adverse impact on terrestrial and marine avifauna during both the construction and operation of the scheme.

The proposed development would also contribute to the rise of ambient temperature due to the increase in artificial land and air-cooling systems having a moderate to major adverse impact on the overall natural environment. Given the property boom in Malta, the proposed development can be expected to result in knock-on effects on the adjacent areas, increasing the extent of large, commercial projects, human activity, infrastructural improvements to cater for increased use and associated impacts leading to increased cumulative effects of habitat degradation and loss. Overall, the cumulative effect of overdevelopment, mass tourism and climate change is expected to have a moderate to high adverse impact on both the environment including avian receptors.

The below mitigation measures have been recommended in the study to reduce the aforementioned impacts on birds:

- Installation of physical barriers and avoiding of nighttime works during the construction phase.
- Landscaping of areas with appropriate vegetation to compensate for lost habitat.

- Implementation of buffer zones around the coastal area to allow resting and foraging of migrating birds.
- Domestic animals are to be kept contained and not to roam freely.
- Noise levels are to be kept to a minimum to avoid disturbance to sensitive avifauna as much as possible.
- Reducing the need for bright lights as much as possible.

9 ARCHAEOLOGY AND CULTURAL HERITAGE

The archaeological and cultural investigation within the Scheme site and surrounding study area revealed the presence of two features of interest:

- St Thomas Tower and battery
- Salt pans

St Thomas Tower lies just outside the Scheme site to the west, but is surrounded by the proposed project on three sides. Whilst the salt pans are located on the low-lying rocky foreshore within the eastern part of the site boundary.

The proposed excavation and rock cutting activities may result in mechanical damage to the St Thomas Tower and Battery, as well as to the immediate surrounding area. These cultural features are also at risk of physical damage from the indirect vibrations generated during construction activities. Both of these adverse impacts are considered to be of minor to moderate significance. The severity will depend on the respect of the 50m protection buffer zone, construction methodologies and effectiveness of mitigation measures.

The below ground level construction activities may also reveal archaeological remains which are not known at this time. In light of the known archaeological features which have been exposed during previous construction works in the area, the adverse impact related to the excavation works is considered to be moderate to major adverse.

The excavation and rock cutting activities should be monitored in accordance with the conditions established by the Superintendence of Cultural Heritage. In addition, it is recommended that daily vibration monitoring takes place during rock cutting works to identify any potential risks to the protected features as soon as possible. Pre and post structural surveys would also be advantageous to evaluate any possible damage which may occur. Furthermore, all construction activities need to respect the relevant policies protecting scheduled properties to limit interventions within the St Thomas Tower and Battery 50m buffer zone. The salt pans shall not be directly affected by the Scheme. However, those located in close proximity to the site, may be subject to minor impacts during rock cutting activities. During such works, polythene sheeting and other protective measures should be implemented.

During the operational phase, the presence of two modern tower blocks will create a visual obtrusion and overshadowing effect on the historic St Thomas Tower. The Scheme design creates a single central visual axis between the Tower and the sea; from other angles there will be various visual obstructions. The overall development will also result in an increase in building massing and vertical scale, when compared to the ex-Jerma Palace hotel. In light of these factors, the proposed development shall have a moderate adverse effect on the settling of the St Thomas Tower and its associated seascape context. Alterations to the Scheme's façade to utilise earth-toned globigerina panelling across the entire façade and to the building profile to create a stepped profile would help mitigate these adverse impacts.

10 AIR QUALITY

The air quality study focused on predicting the impacts from the operational stage of the Scheme. It made reference to baseline Particulate Matter and Nitrogen Oxide collected in 2019 on 12 different receptors at varying distances from the development. Moreover the study also made use of traffic data collected as part of separate Traffic Impact studies. The datasets were inputted into an air dispersion model software to predict future air quality scenarios in the surrounding road network attributed to the changes in traffic from the Scheme. A total of five different scenarios were studied:

- Scenario 1: Baseline year in 2018 (no development)
- Scenario 2: 1st year of Operation in 2030 (no development)
- Scenario 3: 1st year of Operation in 2030 (development fully operational)
- Scenario 4: 5th year of Operation in 2035 (no development)
- Scenario 5: 5th year of Operation in 2035 (development fully operational)

The modelling and impact assessment revealed slight or no increases in nitrogen oxide levels between the no development and the fully operational scenarios. The increase in traffic expected from the proposed Scheme is not predicted to cause a significant increase in nitrogen dioxide emissions in 2030 and 2035. In light of this, the adverse air quality impact from the traffic generated by the Scheme is classified as negligible for NO₂. The annual threshold for NO₂ in accordance with the AMBIENT AIR QUALITY REGULATIONS (S.L.549.59) is 40 µg/m³. The baseline readings and predicted concentrations at all sensitive receptors fall below the threshold limit.

For PM₁₀, the impact is also expected to be negligible across all scenarios, except at R4 in 2030, where a slight adverse impact is predicted. In terms of PM₁₀, the aforementioned regulations set the annual threshold at 40 µg/m³. In all scenarios considered, this threshold is not surpassed at any of the receptors considered.

The impacts predicted for PCT PM₁₀ are more significant, with a variety of negligible, slight, moderate and substantial impacts predicted at different locations and in different scenarios. The most substantial adverse impacts are predicted at R1 and R2, for both 2030 and 2035. The AMBIENT AIR QUALITY REGULATIONS (S.L.549.59) threshold for PCT PM₁₀ is established at 50 µg/m³. This value is exceeded at some of the receptors and across all the Scenarios considered.

The study also emphasises the importance of setting up appropriate transport planning system within the project, the promotion of sustainable transport systems including a green travel plan promoting alternative modes of transport, controlling and monitoring pollutants and the upgrading of the nearby junctions.

11 NOISE AND VIBRATIONS

The noise assessment was conducted in accordance with relevant standards and guidelines. Baseline sound levels were measured at three different NSRs located in proximity of the site:

- **NSR01** – Residential properties located to the northwest of the Site along Triq is-Salini;
- **NSR02** – Residential properties located to the southwest of the Site along Dawret it-Torri; and
- **NSR03** – Residential properties located to the west of the Site along Triq il-Katakombi

For construction activities, the study determined that daytime noise levels at the closest receptors are expected to exceed permissible limits of 65dB. Whilst construction noise is temporary and modelled for worst-case scenarios, the impact is still classified as major adverse, particularly at NSR02. The noise impacts at NSR01 are moderate whilst the impact is negligible at NSR03.

To reduce potential noise impacts, best-practice mitigation measures should be implemented where applicable. Noise emissions should be considered when selecting on-site machinery and equipment, which must be well-maintained and fitted with appropriate silencers, mufflers, or acoustic covers. Stationary noise sources should be positioned as far as possible from noise-sensitive areas, with acoustic barriers used if necessary. Additionally, vehicle movement to and from the site will be regulated, and workers will be instructed to follow noise control protocols.

Vibration impacts during construction works are expected to arise from vibratory compaction and piling activities. The predicted vibration level from compaction is expected to reach 4.39mm/s, which at NSR01 and NSR02 (just 30m away from the construction site) would give rise to moderate adverse impact. Other activities such as piling are expected to give rise to lower vibration levels, however the impact is still classified as moderate at NSR01 and NSR02 due to the site's proximity. At NSR03, the vibration impact is classified as minor due to the distance involved, which exceeds 140m.

Operational noise focused primarily on road traffic arising from the proposed scheme. The study took into consideration the vehicular movements along Triq Sant Antnin, Triq is-Salini, Triq il-Qaliet and Triq tal-Gardiel in 2030 and 2035 and modelled the results with respect to the previously identified NSRs. Moderate to major operational noise impacts are predicted at the residential receptors located along Triq is-Salini. The impact is subdued to minor significance at the other streets. The resulting increases in operational sound levels are expected to remain within a range that is typical of residential environments influenced by road traffic and is not considered likely to result in a substantial deterioration in overall resident amenity. Consequently, no mitigation of operational road traffic noise is proposed, apart from the implementation of Green Travel plan as proposed in the Traffic Impact Assessment.

12 INFRASTRUCTURE AND UTILITIES

Underground electricity and telecommunication cables are present within the development site boundary and may be at risk of accidental damage during construction works. Existing infrastructure located along the site perimeter, including aerial cables, may also be affected by the movement and operation of construction machinery.

Dust generated during construction may also settle on exposed electricity infrastructure, potentially contributing to overheating or corrosion. Such impacts are expected to be minor adverse within the Scheme boundary and minor to negligible adverse outside the Scheme footprint.

Underground telecommunication cables within the site may also be affected by excavation works, ground vibrations and accidental damage. While no aerial cables are present within the Scheme footprint, those located at the site boundary may be vulnerable to accidental contact with construction machinery and dust settlement. Any damage to this infrastructure could result in temporary service or signal disruptions for nearby residents and businesses. Overall, construction-phase impacts on telecommunication infrastructure are assessed as moderate adverse along the site boundary and minor to moderate adverse within the surrounding Area of Influence (AOI).

During construction, potable water and wastewater infrastructure within and surrounding the scheme may similarly be affected by excavation, heavy machinery, vibrations and ground movement. Accidental damage to water mains, pipelines or sewage networks could result in temporary service disruptions and place additional pressure on the existing utility network. Impacts on potable water infrastructure are expected to be minor adverse within the Scheme footprint and minor to moderate adverse within the wider study area. While impacts on wastewater infrastructure are expected to be minor to moderate adverse within the Scheme footprint and minor adverse outside the Scheme boundary.

The scale and mixed-use nature of the scheme will increase the demand of utilities and infrastructure. The additional demand placed on the existing electricity and telecommunication networks is expected to result in minor adverse impacts. Water consumption and wastewater generation are also expected to increase, due to the proposed spa facilities, accommodation and catering establishments. As the existing on-site networks are not expected to have sufficient capacity to accommodate these additional demands, impacts on water and wastewater infrastructure are assessed as moderate adverse.

The identified impacts can be reduced through regular coordination between the Contractor and the relevant authorities, utility providers and other operators. Appropriate precautions should be taken to avoid accidental damage and minimise service disruptions. Additional measures should include effective dust suppression, appropriate site hoarding, and careful movement and operation of construction machinery and vehicles.

13 PUBLIC ACCESS

The Scheme is accessed from Triq is-Salini, between St Thomas Tower and the main entrance to the former hotel. Roads within the surrounding area generally provide demarcated parallel parking spaces on both sides. The area is currently served by one bus route, which primarily provides a connection between Marsascala and Valletta.

Public access to the foreshore is currently restricted by large pre-cast blocks installed due to safety concerns. Some of these blocks have since been moved, creating a narrow and unofficial access point that is currently used by members of the public to reach the foreshore for swimming and other recreational activities. During construction, this access will be closed, temporarily restricting access to the foreshore and causing inconvenience to existing users. This is expected to result in a moderate adverse impact. In the longer term, however, the Scheme includes the regeneration of the foreshore and the provision of safer and more accessible routes to the coast. The operational impact on foreshore access is therefore expected to be major beneficial.

During construction, temporary restrictions are also expected along the coastal road, affecting both vehicular and pedestrian movement and potentially requiring road diversions. The resulting disruption and increased traffic congestion are assessed as a moderate adverse impact. Construction traffic may place additional pressure on the surrounding road network and contribute to temporary bottlenecks; however, given the temporary nature of these effects, the impact is expected to be minor adverse. Construction vehicles should therefore be appropriately managed to avoid queuing, unnecessary idling and obstruction of surrounding roads.

The works will also require the temporary closure of Triq is-Salini, resulting in the relocation of the existing bus stops or requiring passengers to use alternative stops within the surrounding area. Given the temporary nature of this arrangement, the impact on public transport access is expected to be minor adverse.

Once operational, the Scheme will introduce a pedestrianised area between St Thomas Tower and the development, providing improved connections between the public plaza, coach lay-bys, public bus stops and the natural foreshore. The creation of this extensive pedestrian area is expected to considerably improve public access and is therefore assessed as a major beneficial impact. The pedestrianisation of the area will, however, require the permanent relocation of the existing bus stops.

The operation of the Scheme will also generate additional traffic, with an estimated 347 additional trips during peak periods. This increase will place further pressure on existing road junctions, which may require upgrading to accommodate the anticipated traffic. The pedestrianisation of Triq is-Salini will require vehicles to divert around St Thomas Tower, redistributing traffic onto surrounding roads, particularly Triq Dawret it-Torri. Taking into account the increase in vehicle movements and changes to existing traffic flows, the operational impact on the surrounding road network is assessed as moderate adverse.

14 OTHER IMPACTS

14.1 CLIMATE CHANGE AND CLIMATE CHANGE ADAPTATION

The redevelopment of the ex-Jerma Palace complex may result in a minor adverse impact on climate change related to the release of greenhouse gas (GHG) emissions from the following energy intensive activities:

- extraction and production of construction materials
- manufacture of raw materials and machinery
- transportation of these materials
- operation of machinery during construction.

The consumption of energy from the proposed Scheme will also lead to an increase in GHG emissions during its operational phase when compared to the current derelict hotel. This also includes the impact from increased trip generation towards the site. To minimise these operational climate impacts, the project has been designed with environmental compatibility as a key consideration. The development will incorporate a range of energy- and water-efficiency measures, including VRF air-conditioning systems, LED lighting, heat-pump water heating systems, and on-site rainwater harvesting and reuse systems.

The Scheme's coastal location renders it potentially vulnerable to the effects of climate change, particularly sea level rise, coastal storm surges, wave overtopping, and increasingly intense storm events. Nevertheless, the proposed built structures are set back a substantial distance from the shoreline and are positioned at levels considered unlikely to be directly affected by foreseeable coastal inundation scenarios. The Scheme design also incorporates proactive boulder revetments. Therefore, the risk of significant structural damage arising from projected sea level rise or storm-related coastal processes is considered to be relatively low.

The project has also been designed with consideration for Malta's increasingly xeric climatic conditions, characterised by prolonged dry periods, rising temperatures, and more frequent heatwaves. To improve climate resilience and reduce resource demand, the development will incorporate a range of water- and energy-efficiency measures, including rainwater harvesting and reuse systems, water-efficient fittings, drought-tolerant landscaping, and advanced building management systems. Landscaping proposals prioritise native and climate-adapted species with lower irrigation requirements, thereby reducing long-term water demand under increasingly arid conditions.

Rising ambient temperatures may influence cooling demand and overall building performance. However, all buildings will be equipped with advanced smart climate-control systems and energy-efficient infrastructure designed to maintain acceptable internal comfort conditions under elevated temperature scenarios. Consequently, the Scheme is considered capable of adapting to the projected climatic conditions expected over its operational lifespan, and no significant operational constraints associated with future climate change are anticipated.

14.2 ENVIRONMENTAL RISK

The environmental risk study assesses any relevant risks, including major accident scenarios like contamination, emissions, explosions, blasts, flooding and major spillages, which could occur during the phasing of the proposed Scheme.

The preliminary risk assessment identified nineteen potential environmental threats or sources of contamination identified within this EIA study:

One-Time Environmental Risks

- Contamination of geological layers through spillage of oils, chemicals or fuels
- Contamination of the Malta Mean Sea Level Aquifer through spillage of oils, chemicals or fuels
- Contamination of the marine environment through spillage of oils, chemicals or fuels
- Generation of dust from works which may affect surrounding sensitive receptors
- Rock/soil instability which could impact nearby cultural heritage features
- Excessive noise and vibrations which could have consequential impacts
- Spillage of demolition and/or excavation material during transportation
- Dust emissions from transportation of waste rock and soil material
- Increased heavy vehicle movement in the area leading to increased congestion, noise and air emissions
- Construction infrastructure, particularly the presence of multiple tower cranes

Recurring Operational Risks

- Increased GHG emissions due to high energy consumption
- Elevated water and resource demands required to operate a large complex
- Waste and wastewater generation in a currently abandoned/unused area
- Traffic generation and the associated air quality and noise emissions
- Introduction of external lighting
- Presence of several built structures will modify the character of the area

Exceptional Environmental Risks

- Instability of the built structures due to earthquakes
- Flooding of the built structures and outdoor facilities due to extreme rainfall/storm event
- Damage to built structures and surrounding environment as a result of a large-scale fire

The environmental risk assessment evaluates the identified risks to be between low and high risk. The low and moderate risks are associated with the construction, operational and one-time events: increased waste generation, increased water demand and exceptional natural events. Whereas, those of high risk are related to the operation of such a large facility including increases in: water demand, traffic, external lighting and built structures within the area. The implementation of appropriate mitigation measures can reduce the severity of the risks.

14.3 HUMAN POPULATION

The study identified a number of impacts on human populations. Predicted impacts during the construction phase include:

- **Generation of dust:** Reduction in air quality for workers and nearby residents.
- **Generation of noise and vibrations:** Temporary increases in noise and vibration levels in the surrounding area affecting local residents and workers.
- **Traffic generation:** Increase in heavy-duty vehicles visiting the site to transport materials/waste to and from the site.
- **Visual intrusion:** Presence of construction site creates an eyesore for residents and those visiting the area.

Predicted impacts during the operational phase include:

- **Deterioration in air quality:** Increased numbers of vehicles visiting the area and increased demand on power production facilities, both leading to an increased in localised air emissions.
- **Waste generation:** Increased waste generation in area resulting in more waste collection vehicles on the local road network and potential odours.
- **Traffic congestion:** Increased numbers of visitors to the area, most in private cars, coupled with delivery and waste collection vehicles visiting the village will result in localised congestion for other road users.
- **Generation of noise:** Presence of a large complex, with outdoor facilities, will result in an increase in ambient noise levels.
- **Light pollution:** Decorative and functional lighting after daylight hours will increase the ambient light levels which may disturb adjacent local residents
- **Visual intrusion:** The presence of a large built complex will detract from the visual appeal of the area for those residing and visiting in the vicinity. However, it is considered to be an improvement to the currently dilapidated ex-Jerma Palace hotel structures.