



Land Cover and Land/Sea Uses Study in Relation to the Redevelopment of the Ex- Jerma Palace Hotel EIA

As per ERA requirements for PA/00437/23

Report



LAND COVER AND LAND/SEA USES STUDY
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1 SCOPE

This report describes the land cover and land/sea uses impacts arising from the construction and operation of the proposed redevelopment of the ex-Jerma Palace hotel (PA/00437/23), hereinafter referred to as the Scheme. The site is located on Triq is-Salini, Marsaskala, Malta.

This technical study identifies the existing land cover and land/sea uses in the area and assesses the impacts caused in relation to the EIA for the proposed development, in line with the requirements issued by the ERA related to PA/00437/23.

1.1 PROJECT DESCRIPTION

The Scheme involves the demolition of the ex-Jerma Palace Hotel and redevelopment of the site. The former hotel occupied a large footprint to incorporate a wide range of luxury hotel facilities, including 345 guest rooms, restaurants and swimming pools. It was commissioned by Libyan Foreign Investment, but the operations on site were managed by Corinthia Hotels International until 2007 when the hotel closed down. Since its closure, the site has remained abandoned and the remaining structures have fallen into a serious state of disrepair.

The proposed new development will consist of a mixed-use complex featuring a 5-star hotel with supporting amenities, residential apartments, retail outlets, food & beverage establishments, landscaped open areas and dedicated parking facilities to cater for those visiting/residing on the site.



FIGURE 1: OUTLINE OF THE EX-JERMA PALACE HOTEL SITE

2 TERMS OF REFERENCE

The Terms of Reference related to the study on land cover and land/sea uses for the EIA were issued by the ERA on 30th May 2024.

Appendix 1 of this report contains a copy of the ToRs for ease of reference.

3 METHODOLOGY

The methodology comprised four main elements:

1. A preliminary desktop study to familiarise oneself with the study area;
2. A site survey;
3. A secondary literature review to combine the findings of the initial research and site observations;
4. Final evaluation of the current situation.

An assessment of the potential impacts of the Scheme on land cover and land/sea uses was carried out once the baseline was established.

3.1 AREA OF INFLUENCE

The Area of Influence (AOI) for the land cover and land/sea use study comprised of the immediate footprint of the proposed development, together with a 100m buffer zone around the location of the proposed site.

The AOI is mapped in Figure 2.



FIGURE 2: AREA OF INFLUENCE FOR THE LAND COVER AND LAND/SEA USES STUDY

3.2 PRELIMINARY LITERATURE REVIEW

A preliminary literature review focused on the existing information on historic land cover and land/sea use studies within the AoI. A particularly important component during the review process was the analysis of satellite images on the *Google Earth* platform.

Integration and assimilation of the data collated during the review provided a framework for the formulation of a landscape character assessment and the design of a land/sea use classification. Care was taken to ensure that the distinction between different landscape types and land/sea uses was maintained. Once the draft classification had been finalised, a rough map of the land cover and land/sea uses in the area was drawn.

The preliminary literature review also included a review of the relevant national policy. The most important documents which were consulted included the STRATEGIC PLAN FOR THE ENVIRONMENT AND DEVELOPMENT (SPED, 2015) and the SOUTH MALTA LOCAL PLAN (2006). This helped provide a wider context for the proposed development.

3.3 SITE SURVEY

The walk-over survey took into account all of the features and attributes which contribute towards the character of the area. It focused on the present use/s of the proposed Scheme site and surrounding area. Revisions to the draft map which had been designed during the initial literature review stage were made on site.

3.4 SECONDARY LITERATURE REVIEW

The map and general observations made during the site survey underwent a process of integration and analysis. Emphasis was placed on the assimilation and synthesis of information to be used to develop integrated descriptions of the area and its component landscape types and land/sea uses. Geographic Information Systems (GIS) were used to create the land cover and land/sea uses map.

3.5 EVALUATION

An evaluation of the current land cover and land/sea use categories was undertaken to assess and provide judgement related to the inherent sensitivity of the landscape. This included analysis based on the proximity of the different land/sea uses to the Scheme. Current landscape condition (or quality) was based on qualitative judgements about the physical state of the landscape from visual, functional and ecological perspectives. It also reflected the state of repair of individual features and elements which make up the character of the area.

3.6 IMPACT SIGNIFICANCE CRITERIA

The qualitative assessment determines the potential impacts on the present land/sea uses. The potential impacts that may arise from the Scheme could result in a restriction or limited accessibility to current land/sea use activities, along with the permanent loss of certain land/sea uses.

The tables presented in this section (Table 1 to Table 8) provide a definition for each of the criteria used in Table 11, which summarises the assessment of impacts on land/sea use activities.

TABLE 1: CRITERIA FOR THE DURATION OF THE IMPACT

DURATION OF IMPACT	
LEVEL	DEFINITION
Permanent	Impact would still be detectable during the concerned phase.
Temporary	Impact would not persist through the whole duration of the concerned phase.

TABLE 2: EXTENT OF IMPACT CRITERION DESCRIPTION

EXTENT OF IMPACT	
Widespread	Impact is expected to affect the entire area of study and may extend beyond the side boundaries into adjacent areas
Localised	Impact is expected to affect receptors in the immediate vicinity of the source

TABLE 3: CRITERIA FOR THE PROBABILITY OF THE IMPACT OCCURRING

PROBABILITY OF IMPACT OCCURRING	
LEVEL	DEFINITION
Inevitable	Level of certainty that impact will occur is greater than 90%
Likely	Level of certainty that impact will occur ranges between 50-90%
Unlikely	Level of certainty that impact will occur ranges between 30-50%
Remote	Level of certainty that impact will occur is below 30%

TABLE 4: CRITERIA FOR THE NATURE OF THE IMPACT

EFFECT OF IMPACT	
LEVEL	DEFINITION
Adverse	Land and/or sea uses would suffer consequences as a direct result of the proposed development.
Beneficial	Land and/or sea uses would benefit as a direct result of the proposed development.

TABLE 5: CRITERIA FOR THE CONSEQUENCES OF THE IMPACT

CONSEQUENCES OF THE IMPACT	
LEVEL	DEFINITION
Direct	Direct impact refers to the immediate changes that occur as a result of features or activities related to the proposed development.
Indirect	Indirect impacts are effects caused by the proposed development's features or activities that occur later in time or are farther removed in distance than direct impacts.
Cumulative	Impacts resulting from an accumulation of the project impacts and other past, present or known planned developments, activities and land/sea uses.

TABLE 6: CRITERIA FOR THE SENSITIVITY & SEVERITY OF RECEPTORS TO THE IMPACT

SEVERITY, SENSITIVITY & RESILIENCE OF RECEPTORS TO THE IMPACT

LEVEL	DEFINITION
High	This action is a major contributor to the activities in the area of influence.
Medium	This action is a moderate contributor to the activities in the area of influence.
Low	This action is a minor contributor to the activities in the area of influence.

TABLE 7: CRITERIA FOR THE REVERSIBILITY OF THE IMPACT

REVERSIBILITY OF IMPACT

LEVEL	DEFINITION
Reversible	State of the resource is potentially expected to return to baseline background level following cessation of the impact.
Irreversible	Impact is expected to cause partial or total destruction of the resource under consideration and a return of the state of the resource to baseline levels is considered highly improbable.

TABLE 8: CRITERIA FOR THE IMPACT SIGNIFICANCE

IMPACT SIGNIFICANCE

LEVEL	DEFINITION
Negligible	No significant impact.
Minor Significance	The impact is minimal and therefore unlikely to have a noticeable or long-lasting effect on land/sea use. In the case of adverse impacts, mitigation is either easily achieved or requires minimal effort.
Moderate Significance	Impact on land/sea use is tangible but not substantial in relation to other impacts that might take effect. In the case of adverse impacts, mitigation is both feasible and fairly easy.

IMPACT SIGNIFICANCE

Major Significance	The impact is of substantial and noticeable magnitude. In the case of adverse impacts, there is little or no possible mitigation that could offset the impact. A substantial change in the use, or intensity of use, of land/sea including, or in its capacity to support existing uses.
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4 BASELINE STUDY

4.1 GENERAL DESCRIPTION OF THE AREA OF INFLUENCE

The proposed Scheme site is located along the South-East coast of Malta, within the administrative boundary of Marsascala. The site occupies a total area of approximately 42,983m², of which 17,570m² can be developed. There are a variety of current land uses within the boundary of the site itself, including derelict hotel buildings, disturbed areas, roads, pavements, salt pans and open foreshore.

The site partially surrounds the historic St Thomas Tower. The rest of the terrestrial AoI is residential in nature. The marine area of the AoI is predominantly used for informal recreational purposes such as small boating activities, fishing and swimming.

The proposed development does not intersect any protected Natura 2000 sites. However, two Natura 2000 sites are located in proximity to the development:

- **Terrestrial**
MT000023 - *Il-Magħluq tal-Baħar ta' Marsaskala* designated as a Special area of Conservation of International Importance via Government Notice 311 of 2006.
- **Marine**
MT0000108 - *Iż-Żona fil-Baħar tal-Lvant* designated as a Special Protection Area of International Importance via Government Notice 1311 of 2016.

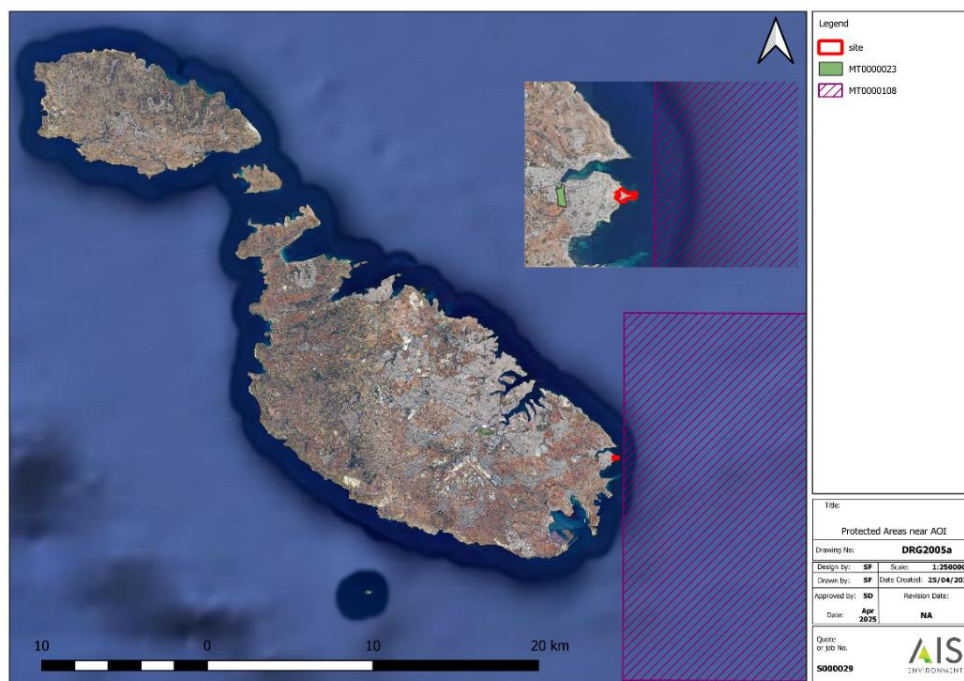


FIGURE 3: NEARBY SITES PROTECTED WITHIN THE NATURA 2000 FRAMEWORK

4.1.1 Ex-Jerma Palace Hotel Site, Marsascala: Development Brief

In line with the requirements of the South Malta Local Plan (SMLP), the Planning Authority prepared a Development Brief specifically for the Ex-Jerma Palace hotel site, entitled COMPREHENSIVE PLANNING AREA FOR REGENERATION OF THE URBAN COAST: EX-JERAM PALACE HOTEL SITE, MARSASCALA: DEVELOPMENT BRIEF (2020).

The Development Brief outlines several factors which need to be taken into consideration when designing a new development for the site; including visual aesthetics, transportation links, infrastructural provisions, and environmental and social impacts. The Brief also provides guidelines that must be met when designing redevelopment proposals for the site related to the scale of development, land uses, built volumes, road access and utility infrastructures.

The Development Brief covers the entire area of the ex-Jerma Palace promontory. It divides the site into 4 distinctive zones based on their character and developmental constraints:

- Zone A: Developable area to accommodate new buildings and uses
- Zone B: Protected foreshore, to be left natural and open for public use
- Zone C: Protected scheduled building and immediate surrounding area
- Zone D: Public streets to provide unhindered access to nearby private property



FIGURE 4: ZONING OF THE AREA INCLUDED IN THE EX-JERMA PALACE DEVELOPMENT BRIEF (2020)

4.1.2 South Malta Local Plan

The Scheme site falls under the governance of the SOUTH MALTA LOCAL PLAN (SMLP, 2006). Two of the main areas of strategic development for the Southern Malta region are housing and tourism, both of which are highly relevant to the proposed project. Specific targets of the aforementioned areas include:

- **Housing**
 - *Protect and improve the amenity of residential areas*
 - *Allow the development of appropriate uses within residential areas*
- **Tourism**
 - *Consolidate Marsascala as the main tourist area*
 - *Encourage tourism accommodation through rehabilitation of vacant buildings within the UCAs and in rural areas*
 - *Safeguard existing and encourage development of new recreational areas and facilities*

Table 9 summarises the policies within the SMLP which are most relevant to the Scheme.

TABLE 9: SITE RELEVANT ASPECTS OF THE SMLP, 2006

POLICY NAME	POLICY CODE	BRIEF DESCRIPTION AND RELEVANCE
Tourism Development Subject to a Development Brief	SMMS 15	Any development of the ex-Jerma Palace should incorporate tourist accommodation; and may also include residential and commercial uses. This being said, all development proposals are subject to the criteria outlined in the specific Development Brief document.
Heritage Sites (St Thomas Tower)	SMMS 13	St Thomas Tower is surrounded by the Scheme site on three sides. This policy focuses on the potential to develop St Thomas Tower (and Zonqor Battery) as a cultural attraction, including the potential for ancillary visitor facilities.
Public Urban Open Spaces, Squares and Green Areas	SMSE 04	The Scheme site coastal and eastern areas are classified as Green Areas. The open character of these areas must be retained and only low-key environmental improvements shall be permitted e.g. soft landscaping.

POLICY NAME	POLICY CODE	BRIEF DESCRIPTION AND RELEVANCE
		The Policy also stipulates that new developments should include open urban spaces and upgrade any existing piazzas.
Promote and Safeguard Public Access Along the Coast	SMCO 05	The Scheme site incorporates a relatively long stretch of coast. This policy aims to protect and where necessary rehabilitate the natural coastline. Any development proposal which prohibits or restricts public access to the coast shall be rejected.
Protection of Areas of Ecological Importance (AEIs) and Sites of Scientific Importance (SSIs)	SMCO 03	The coastal fringe within the Scheme site is classified as an area which is recommended for scheduling. In general, development in these areas shall not be viewed favourably.
Residential and Residential Priority Areas	SMHO 02 SMHO 04	The area around St Thomas Tower, within the Scheme site, and the areas to the north and south of the site are classified as Residential and Residential Priority areas respectively. Any developments within the residential areas need to either be residential in nature, or compatible with the overall character of residential neighbourhoods.

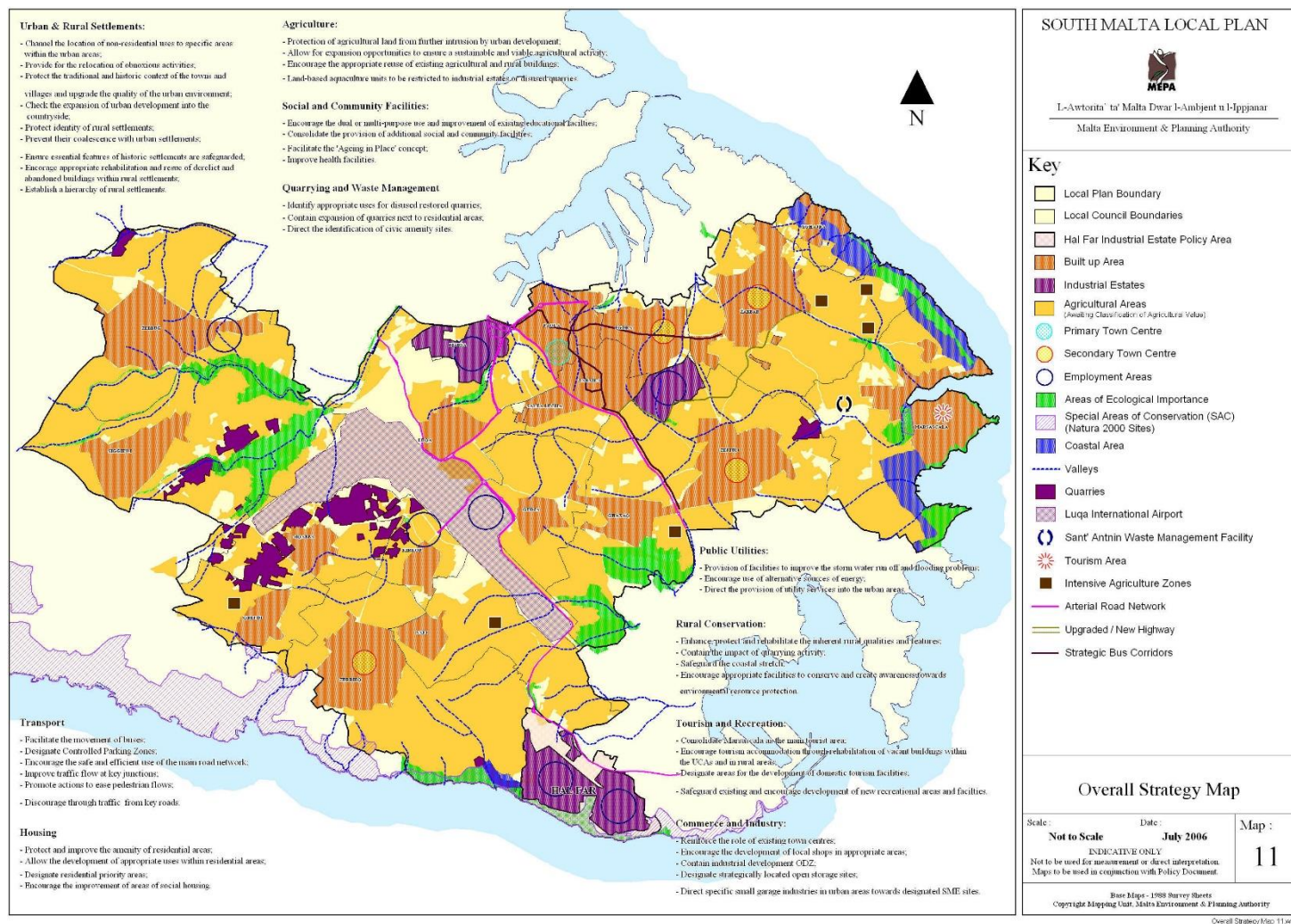


FIGURE 5: SOUTH MALTA LOCAL PLAN OVERALL STRATEGY (SOURCE: SMLP, 2006)

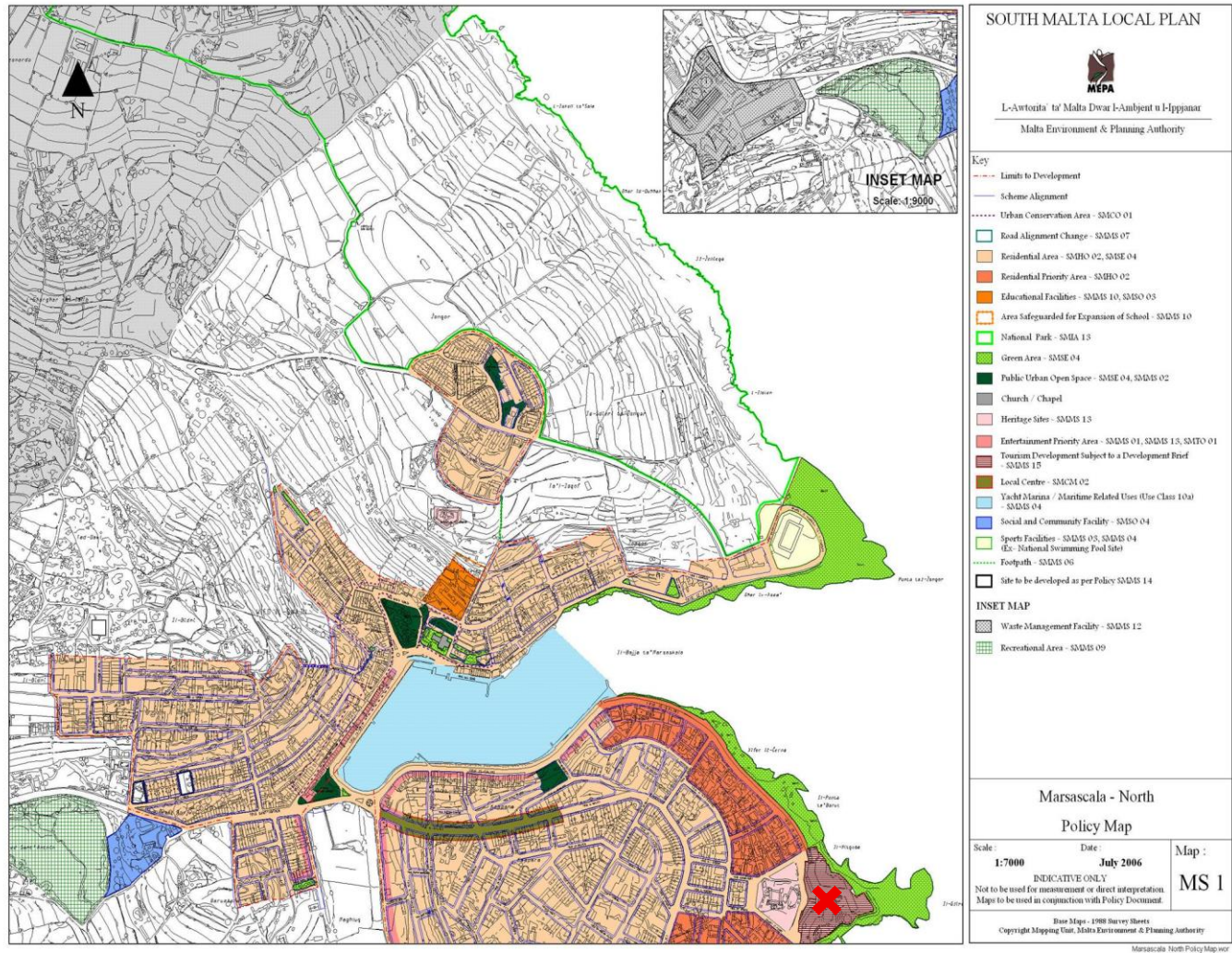


FIGURE 6: MARSASCALA NORTH POLICY (SOURCE: SMLP, 2006)

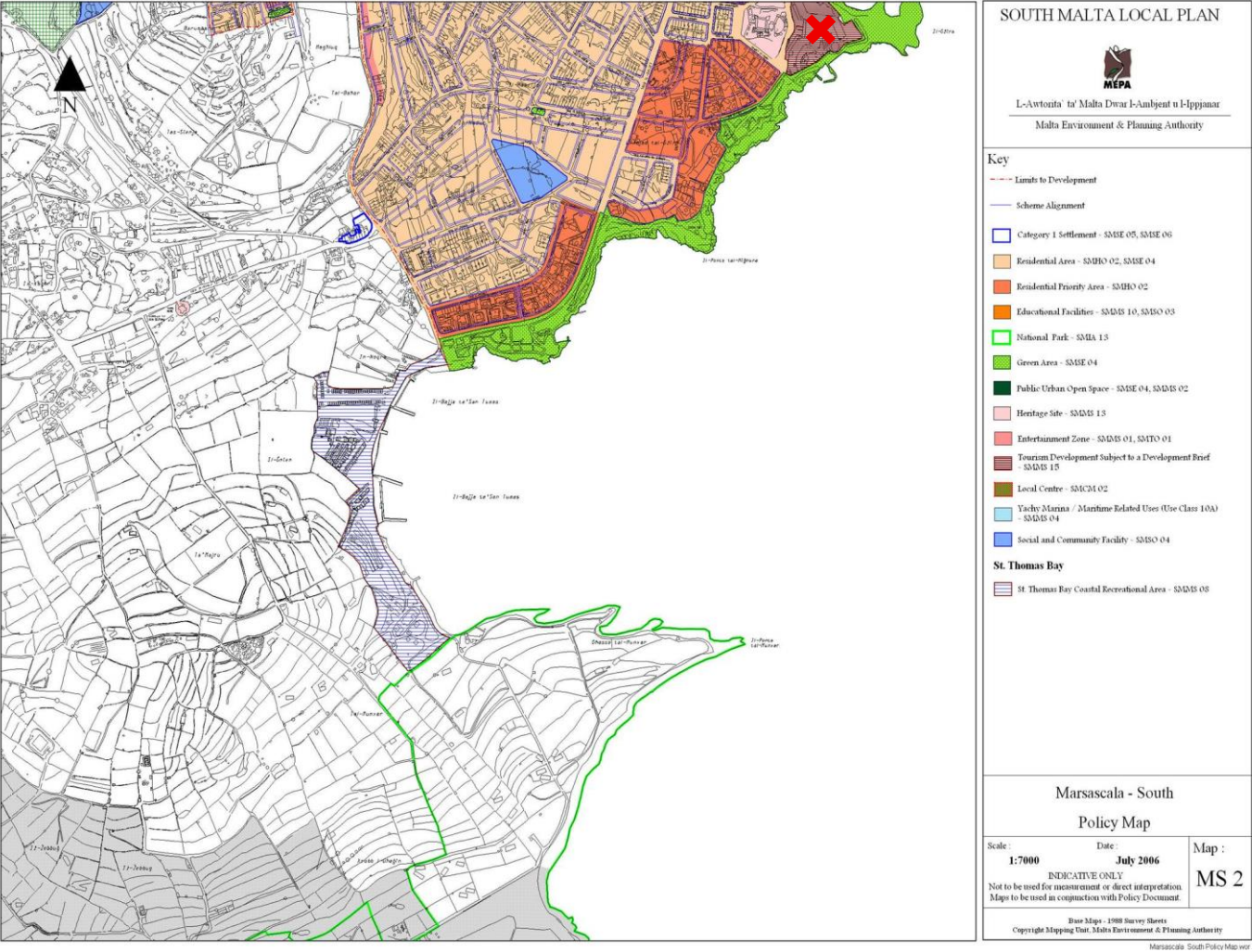


FIGURE 7: MARSASCALA SOUTH POLICY (SOURCE: SMLP, 2006)

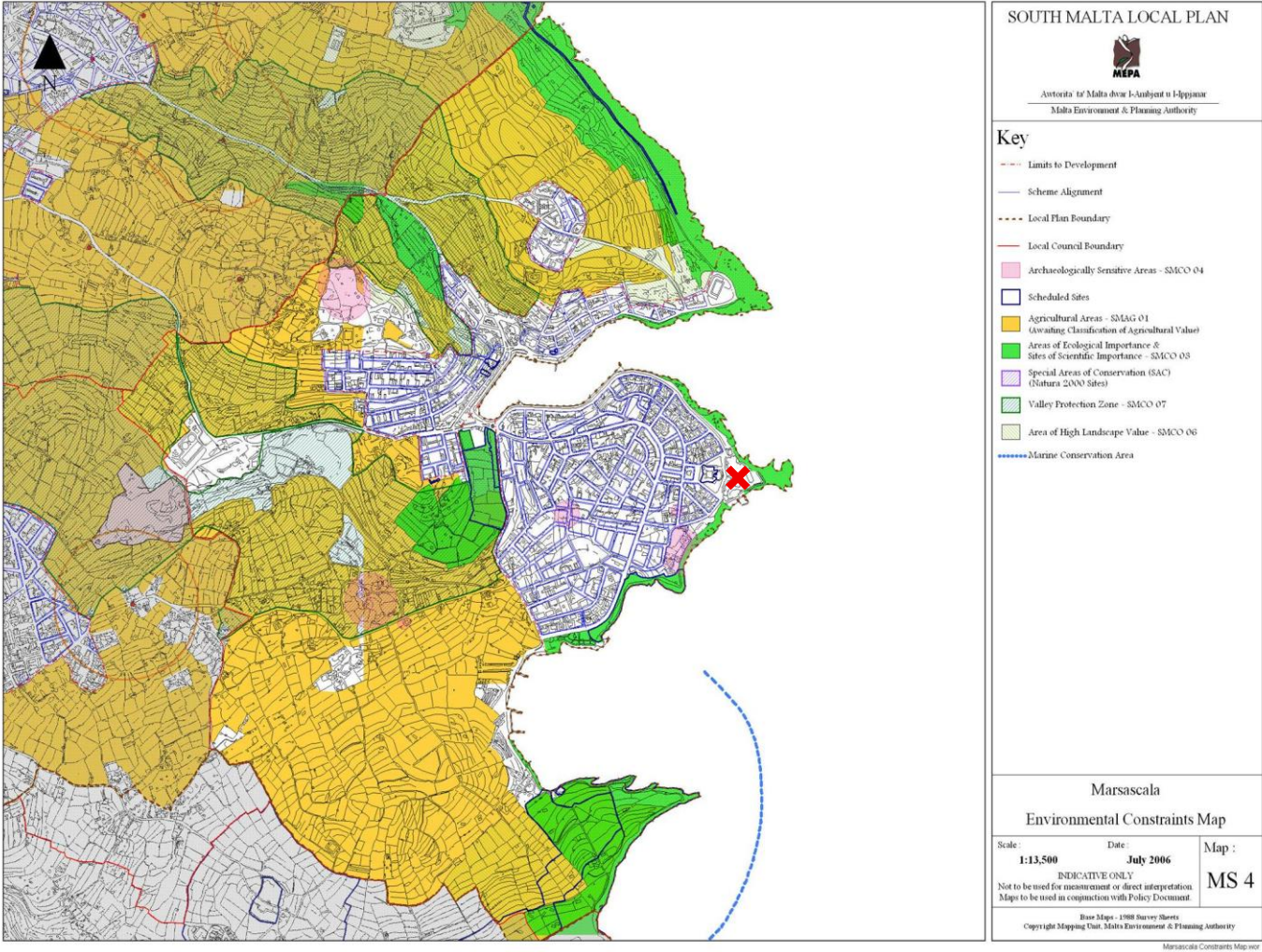


FIGURE 8: MARSASCALA ENVIRONMENTAL CONSTRAINTS (SOURCE: SMLP, 2006)

4.1.3 Local Notice to Mariners No. 076 of 2026

Each year, Transport Malta designates several coastal areas around the Maltese Islands as swimming zones. These areas are clearly marked with ropes and buoys to ensure their visibility. To protect swimmers, all vessels are prohibited from entering these designated zones. At the time of drafting of this report, the relevant Local Notice is No. 076 of 2026. Part of one such swimming zone, referred to as Il-Bajja ta' Marsacala (opposite Jerma Palace), falls within the study area.

TABLE 10: SEAWARD LIMIT OF SWIMMING ZONE IL-BAJJA TA'MARSACALA (OPPOSITE JERMA PAALCE) (SOURCE: LOCAL NOTICE TO MARINERS No. 076 OF 2026)

POSITION MARKER REF	LATITUDE	LONGITUDE
38A	35°51'.913	14°34'.099
38B	35°51'.917	14°34'.103
38C	35°51'.894	14°34'.260
38D	35°51'.802	14°34'.385
38E	35°51'.698	14°34'.529

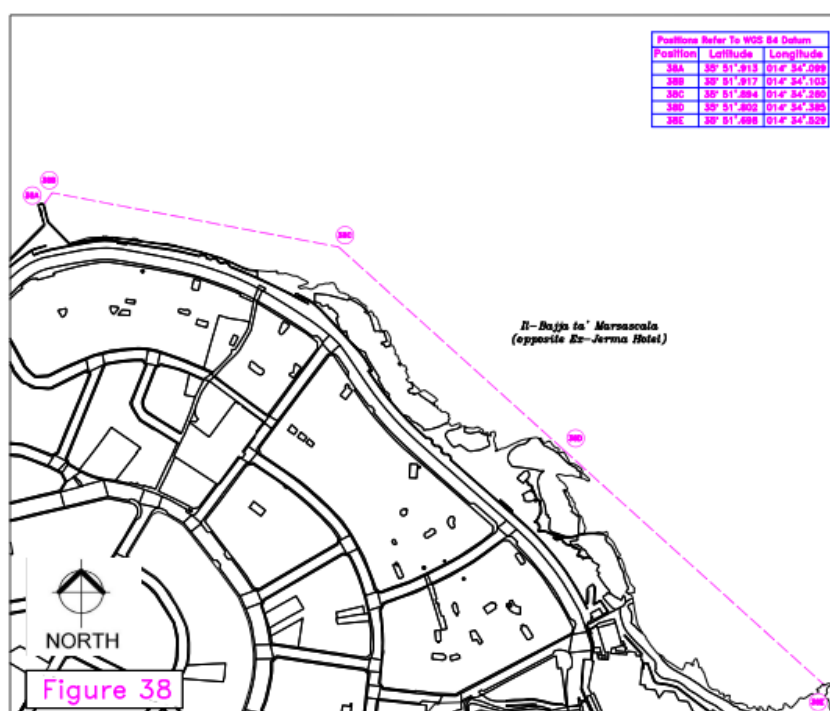


FIGURE 9: IL-BAJJA TA'MARSACALA (OPPOSITE EX-JERMAN HOTEL) SWIMMING ZONE (SOURCE: LOCAL NOTICE TO MARINERS No. 076 OF 2026)

4.1.4 Strategic Plan for the Environment and Development (SPED, 2015)

The SPED provides an overall vision and guidelines for all development within the Maltese Islands. It is composed of several thematic areas, each of which is divided into more detailed objectives. As highlighted in the COMPREHENSIVE PLANNING AREA FOR REGENERATION OF THE URBAN COAST: EX-JERMA PALACE HOTEL SITE, MARSASCALA: DEVELOPMENT BRIEF (2020), the most relevant SPED objectives related to the proposed Scheme are:

- **Socio-Economic Development Objective 1**
To manage the available potential space and environmental resources on land and sea sustainably to ensure that the socio-economic development needs are met whilst protecting the environment and limiting land take up within the Rural Area by Identifying degraded areas within the Urban Area for integrated regeneration particularly declining coastal resorts such as Marsascala, Qwara and Bugibba.
- **Environmental Thematic Objective 8**
To safeguard and enhance biodiversity, cultural heritage, geology and geomorphology by Controlling activities which might have an impact on areas, buildings, structures, sites, spaces and species with a general presumption against the demolition of scheduled and vernacular buildings.
- **Coastal Objective 1**
To prioritise uses that necessitate a location on the coastal zone and marine area in a manner which minimises user conflicts, does not accelerate coastal erosion, protects biodiversity, cultural heritage, landscapes and visual access to them, public access and use and increases resilience to climate change impacts by Designating a predominately terrestrial urban coast to promote compatible urban coastal uses, safeguard legitimise coastal uses and visual access from promenades, and enhance public use of bathing areas.
- **Urban Objective 3**
To identify, protect and enhance the character and amenity of distinct urban areas by Identifying sites which are derelict, in a state of abandonment, of poor quality or include incompatible uses and seek their upgrading through high quality development Controlling the proximity of non-residential uses in urban areas Protecting and greening open spaces which contribute towards the character and amenity of urban areas, reduction of soil sealing and support biodiversity with a view of developing ecological corridors.

4.2 LAND AND SEA USES WITHIN THE AOI

4.2.1 Within the Scheme Footprint

4.2.1.1 Terrestrial

The abandoned ex-Jerma Palace hotel building and its peripheral facilities occupy a large percentage of the Scheme site. These buildings are mostly empty, stripped of from their original apertures, furniture and finishing features. Since they have been abandoned for nearly 20 years, the buildings have fallen into a serious state of disrepair.

Traditional salt pans are found along the coastal edge in the eastern and southern areas of the Scheme site. They are no longer actively used, but remain a unique feature of the Maltese rural coastline. The remaining coastal zone within the site footprint comprises of open foreshore; most of which comprises of undisturbed and rugged exposed limestone. In contrast, the foreshore to the south has been concreted over to form a smooth surface, which is easier to navigate on foot.

The perimeter of the Scheme is blocked by several large pre-cast blocks due to safety concerns. However, an entrance has been made by vandals on the south of the site allowing the area to be accessed by the public. It is through this illegal access point that people are able to access the foreshore. People therefore, do frequent the site, specifically the foreshore, for informal recreational purposes such as sunbathing, coastal walks and fishing.

The Western side of the site differs in character. Landscaping areas surround the grounds of St Thomas tower, while a road running north to south bisects the scheme site, creating a physical separation between the ex-Jerma Palace site and the tower.



FIGURE 10: DERELICT EX-JERMA PALACE HOTEL BUILDINGS (MAY 2026)



FIGURE 11: ABANDONED HOTEL AND OUTDOOR FACILITIES (MARCH 2025)

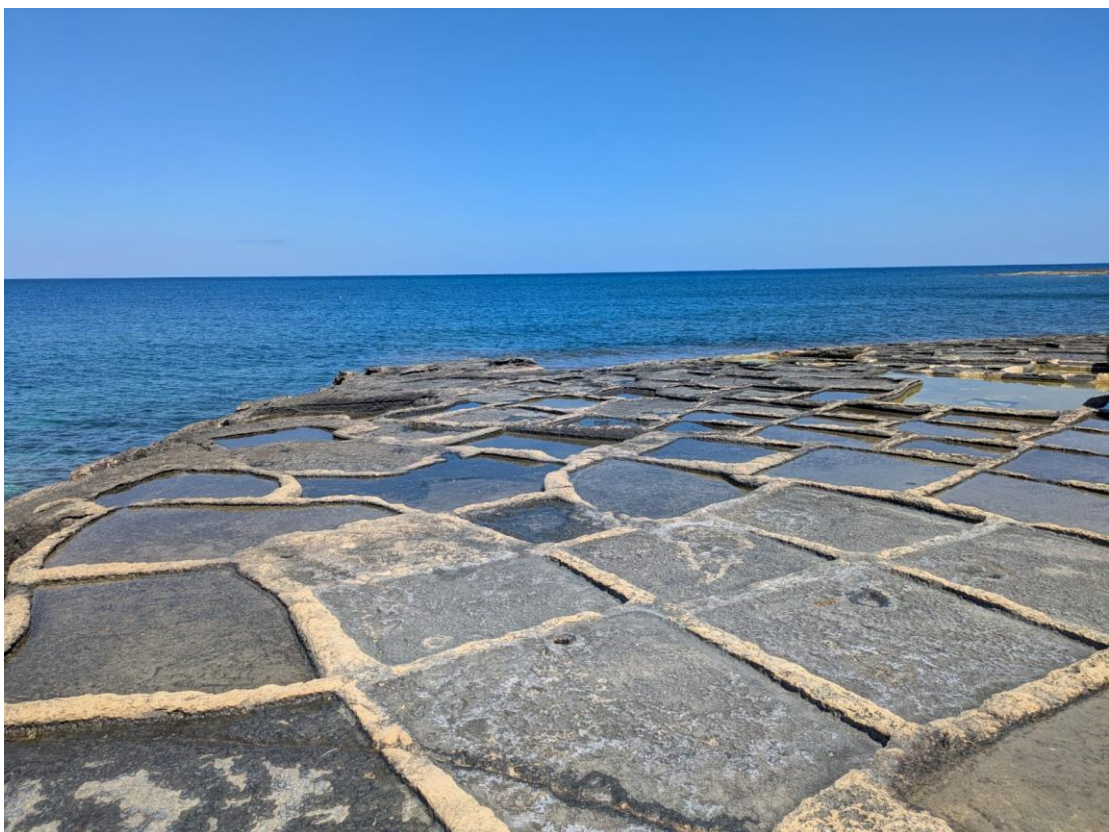


FIGURE 12: SALT PANS WITHIN THE CONFINES OF THE SITE (MAY 2026)



FIGURE 13: SECTION OF THE NATURAL FORESHORE (MAY 2026)



FIGURE 14: CONCRETED SECTION OF THE FORESHORE (MAY 2026)



FIGURE 15: CURRENT OPENING TO THE SCHEME SITE (MAY 2026)



FIGURE 16: GROUNDS AROUND ST THOMAS TOWER (MARCH 2025)

4.2.1.2 Marine

There is no marine area within the confines of the site boundary. However, a small sea wall, included within the confines of the Scheme site, protrudes from the southern boundary. It has a few small steps leading down to the sea, making it a convenient spot to embark and disembark small vessels.



FIGURE 17: SMALL SEA WALL, WITH ACCESS STEPS, PROTRUDING OUT FROM THE SOUTH OF THE SITE (MAY 2026)

4.2.2 Within the Area of Influence

4.2.2.1 Terrestrial

Residential accommodation dominates the western side of the AoI. The housing comprises of a mixture of spacious villas, traditional houses and a few modern apartment blocks. The streets are generally quite small, with pavements and parallel parking spaces on either side.

In the centre of the AoI, between the residential area and the ex-Jerma hotel site stands the historic St Thomas Tower. It is the largest watch tower built in the era of the Knights of St John as part of the national defense system in the Maltese islands. The interior has recently been refurbished to accommodate the national piracy and corsair museum.

The coastal zone within the AoI is typical of an urban Maltese coastline, with a flat promenade providing ideal opportunities for walking and running. Disturbed areas and small coastal garrigue communities lie between the promenade and sea. Two

additional areas containing salt pans are also present on the coast. One of these areas is located to the north of the site, whilst the other is located to south.



FIGURE 18: VILLAS, TRIQ IT-TORRI (GOOGLE EARTH)

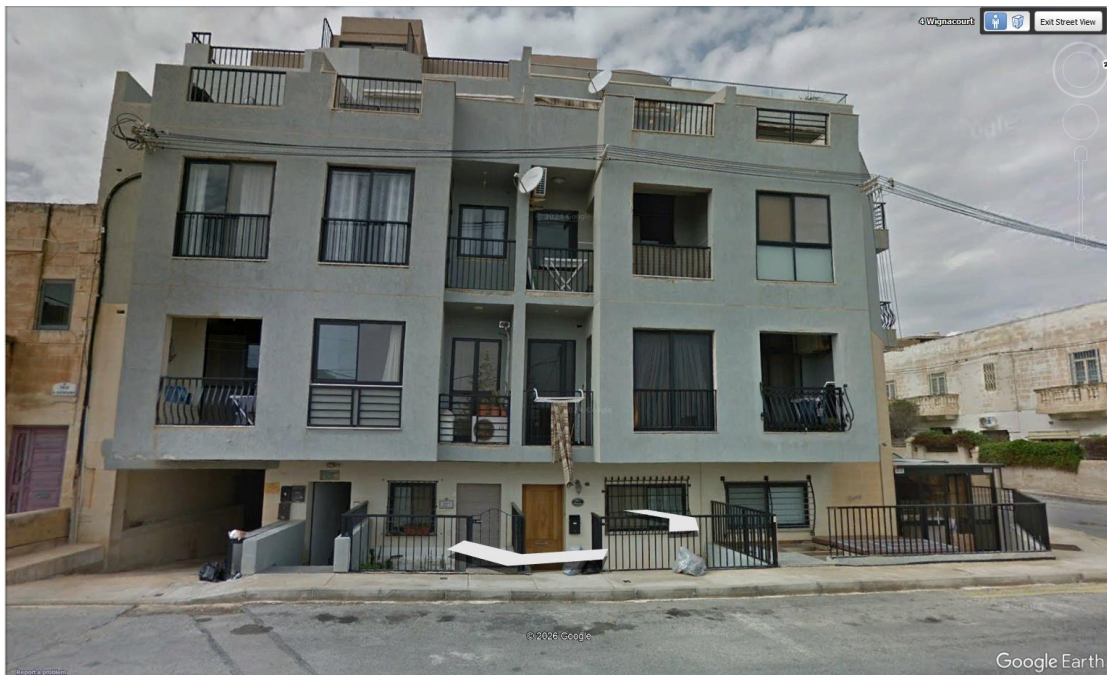


FIGURE 19: MODERN APARTMENT BLOCK, TRIQ IL-KATACOMBI (GOOGLE EARTH)



FIGURE 20: TERRACED HOUSES, TRIQ DE ROHAN (GOOGLE EARTH)



FIGURE 21: ST THOMAS TOWER (MARCH 2025)



FIGURE 22: WIDE PAVED PROMENADE IN THE NORTH OF THE STUDY AREA (MARCH 2025)



FIGURE 23: DISTURBED AREA BETWEEN THE PROMENADE AND SEA, TO THE SOUTH OF THE SITE (MARCH 2025)



FIGURE 24: COASTAL GARRIGUE AREA (MAY 2026)



FIGURE 25: SALT PANS OUTSIDE OF THE SITE, BUT WITHIN THE STUDY AREA (MARCH 2025)

4.2.2.2 Marine

Due to the natural configuration of the peninsula, the Scheme site is surrounded by sea to the north, east and south. As per the Local Notice to Mariners No. 076 of 2026, the marine area to the north is a designated swimming zone. Such areas are demarcated with bouys and ropes to prevent vessel entry. Swimming ladders and walkways are also typically installed along the coast in the summer months to enable swimmers easy and safe access into the sea. Despite the cordoned off safe swimming area, some people also swim outside of such areas. Due to the designation of this swimming area, the foreshore is frequented by both locals and tourists for relaxation time, sun bathing, swimming, fishing and socialising.

Outside of the swimming zone, there are no restrictions on vessel activity. However, due to the natural rocky configuration of coastline and relatively shallow bathymetry, mooring and navigation options are limited to the small seawall, as described in Section 4.2.1.2. Despite this, during the summer months, private vessels sometimes anchor in the area for the day to enjoy the peace and quiet of the locality.

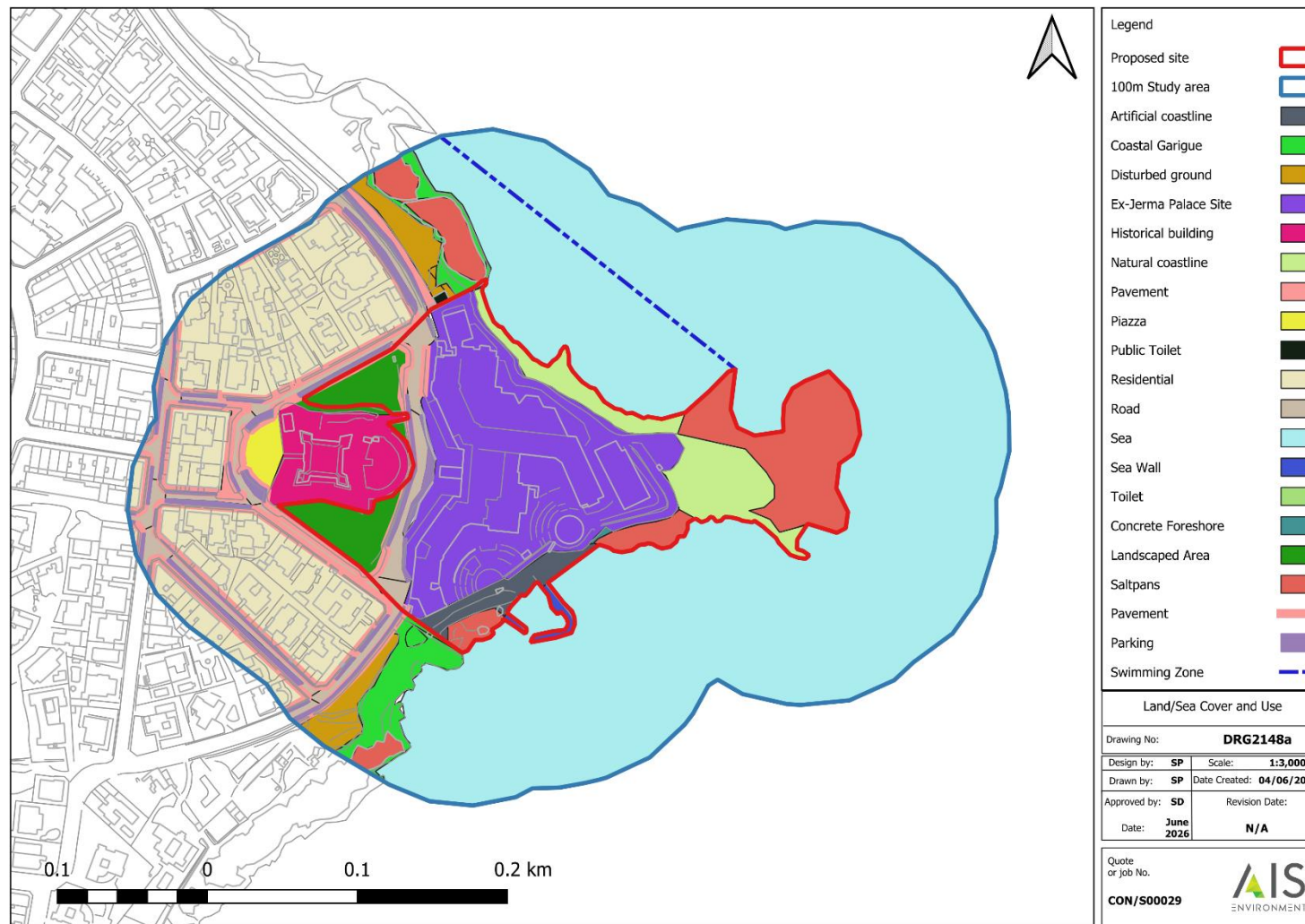


FIGURE 26: LAND AND SEA USES IN THE STUDY AREA

5 IMPACT ASSESSMENT

The following sections describe the envisaged impacts on the Scheme on the land cover and land/sea uses within the AoI.

5.1 IMPACTS ON LAND USES

5.1.1 Construction Phase

5.1.1.1 Restrictions to Foreshore

The construction phase will be confined entirely within the designated development footprint, with all construction activities, machinery, vehicles, material storage areas, and waste management facilities contained within the site boundary. As the site and foreshore is currently only accessible via trespassing through the ex-Jerma Palace site, no additional permanent loss of publicly accessible land or marine areas is anticipated during the construction phase.

Nevertheless, the installation of temporary site hoarding and construction security measures will formalise the exclusion of public access and may restrict existing informal recreational activities that currently take place within the peninsula, particularly along the coastal edge. These activities include walking, sunbathing, fishing and other informal use of the rocky shoreline. The temporary loss of access is likely to be more noticeable during the summer months, when visitor numbers and recreational use of the surrounding coastline are generally higher.

Given that public access to the site is already discouraged and restricted on health and safety grounds, and that any additional access limitations will be temporary and limited to the duration of the construction works, the resulting impact on land use and sea use is considered to be temporary, localised, and of minor adverse significance.

5.1.1.2 Pedestrian and Vehicle Circulation Restrictions

Large construction vehicles will require access to the site on a regular basis throughout the construction phase. The frequency will vary depending on the activities taking place. For example, vehicle activity will be particularly intensive during the removal of excavation waste from site and during on site casting of large structures/areas. This may result in congestion on the local road network, affecting the ability of other road users to freely navigate around the small neighbourhood roads.

The increased numbers of construction vehicles, especially if they are queuing on the roads, may also alter the pedestrian routes around the immediate vicinity of the Scheme site.

Alterations to both pedestrian and vehicle circulation routes, coupled with the associated inconveniences may occasionally deter people from visiting the area for recreational purposes. This is considered to be an adverse impact of minor significance.

5.1.1.3 Dust and Noise Generation

Increased levels of dust and noise generation are inevitable during the construction works on the Scheme. Such atmospheric emissions are expected to be the highest during the demolition and excavation activities. The generation of excess dust could result in the temporary deterioration of air quality in the nearby areas which may become a considerable nuisance to the people visiting the area and the nearby residents. Similarly, the generation of excess noise could also affect the nearby residential uses in the area. These adverse impacts are classified as minor significance due to their intermittent nature.

5.1.2 Operational Phase

5.1.2.1 Redevelopment of Abandoned Site

The proposed Scheme involves the comprehensive regeneration of the long-abandoned ex-Jerma Palace site, transforming it from a derelict and inaccessible property into a mixed-use development comprising of tourist accommodation, residential units, commercial facilities, public open spaces and recreational amenities. This change in land use represents the reuse of a previously developed neglected site, thereby avoiding the need to accommodate a similar development on undeveloped land elsewhere.

The redevelopment is expected to revitalise a neglected section of the Marsascala coastline, enhancing the overall quality and functionality of the area while generating new economic activity, employment opportunities and recreational facilities for both residents and visitors. The introduction of a diverse mix of complementary land uses will promote year-round activity, improve the attractiveness of the locality and contribute towards the wider regeneration objectives established for the site.

Furthermore, the proposed land uses are consistent with the planning vision and strategic objectives set out in both the South Malta Local Plan and the site-specific Development Brief. Accordingly, the proposed redevelopment is considered to give rise to a major beneficial impact on land use within the Area of Influence, representing a significant enhancement over the existing baseline conditions.

5.1.2.2 Intensification of Activity

The operation of the proposed Scheme will result in a substantial intensification of land use compared to the existing baseline. Consequently, the number of residents, visitors, employees and associated vehicular movements within the area will increase significantly.

This increase in activity is expected to alter the character of the locality, which is predominantly residential and relatively tranquil, through higher levels of traffic, noise, human activity and general urbanisation. While such changes may be perceived as incompatible with the surrounding residential context, the proposed mixed-use redevelopment is consistent with the vision and objectives established in both the South Malta Local Plan and the site-specific Development Brief.

Although the Scheme delivers significant regeneration benefits, the operational intensification of land use is considered to give rise to a moderate adverse impact on the surrounding locality.

5.1.2.3 Restored Access to Foreshore

In accordance with the objectives of the Development Brief, the Scheme includes the restoration of free unrestricted public access to the natural foreshore. The proposed works comprise the clearance and reorganisation of existing boulders that currently impede access, together with the construction of dedicated pedestrian pathways to improve accessibility and safety.

As public access to this section of the coastline has been effectively restricted for several years, these interventions will reinstate opportunities for informal recreation and enhance the public enjoyment of the coastal environment. Consequently, the restoration of foreshore access is considered to constitute a major beneficial impact on land and coastal use within the Area of Influence.

5.2 IMPACTS ON SEA USES

5.2.1 Construction

5.2.1.1 Marine Pollution

The presence of a construction site in a coastal area inherently poses a risk to the integrity of the marine environment due to the potential for contamination from various sources of pollution. The most likely, and potentially most serious pollution factor, relates to the presence of oils, fuels, chemicals and other harmful substances in the coastal zone. Accidental spills or leaks of any of these substances can result in the pollutant either flowing directly into the sea, or being washed into the marine area by surface run-off or other water sources.

Similarly, if the ground conditions within the site are not managed correctly, there is the potential for fine dust to be blown or washed into the sea. Dust may be transported into the sea through natural surface runoff during rainfall events, as well as through washing activities, excessive watering of exposed ground surfaces and rough sea conditions. These water-related pathways of pollutant transfer are also applicable to concrete washing residue generated from the onsite washing of concrete vehicles, machinery and equipment if no containment measures or practices are implemented.

Lightweight litter, waste materials and other loose construction materials are particularly susceptible to wind dispersal and may be blown directly into the marine environment during periods of strong winds. Once deposited in the sea, such materials can contribute to marine pollution, adversely affect water quality and pose risks to marine organisms through ingestion, entanglement or habitat degradation.

Overall, if any of these pollutants from the Scheme site were to enter the marine environment, it would diminish the quality of the sea in the nearby vicinity, and hence forth reduce the appeal of the area for swimming and other water related activities.

Due to the nearby designated swimming zone and general popularity of the area for swimming, the adverse impact is classified as being of moderate significance.

5.2.2 Operational

5.2.2.1 Marine Pollution

In comparison to the derelict site, the operation of a large multi-use complex poses risks of localised marine pollution. Surface run off, from natural rainfall events and site cleaning activities, can wash residues from the ground into the sea.

Light-weight items of litter will also be at risk of being blown into the sea with strong gusts of wind. During intense storm events, any unsecured equipment and furniture such as chairs may also be washed into the marine environment.

Any pollution to the marine environment will potentially result in a deterioration of the water quality and aesthetics of the overall area. This will deter people from coming to the foreshore to enjoy the sea for a variety of recreational purposes. The likelihood of the pollution occurring is low and the nature of the pollutants are unlikely to be particularly harmful. Therefore, the severity of the impact is considered to be minor adverse.

5.2.2.2 Restoration of the Foreshore

The proposed restoration of the public access to the foreshore, along with its general rehabilitation (i.e. the relocation of large boulders) and redevelopment of the abandoned hotel site will drastically increase the appeal of the area. It is reasonable to expect that this will result in larger numbers of people, both locals and visitors, frequenting the foreshore to access the sea for informal recreational past-times such as swimming, snorkelling, fishing and boating activities. This is considered to be a moderate beneficial impact of the proposed Scheme.

On the other hand, this increase in people and associated noise will reduce the tranquillity of the area for sea users. This adverse impact is considered to be of minor significance.

6 MITIGATION MEASURES, RESIDUAL IMPACTS AND MONITORING

6.1 MITIGATION MEASURES AND RESIDUAL IMPACTS

6.1.1 Land Use

6.1.1.1 Construction Phase

Restrictions to Foreshore

If feasible, the site hoarding should be positioned to allow public access to the foreshore. This will enable the natural area to still be utilised by the general public for informal recreational purposes. If such access can be retained, the impact on recreational land use may be partially mitigated leading to a slight reduction on the significance of the minor impact.

Pedestrian and Vehicle Circulation Restrictions

A traffic management plan should be drawn up for the project. The plan should include a wide range of measures to keep the disruptions on the local road network to a minimum such as scheduling the arrival of large vehicles to avoid queuing and avoidance of peak traffic hours. If a traffic management plan is followed throughout the construction phase, the severity of the adverse impact can be downgraded to negligible as the vast majority of the inconveniences should be eliminated.

Dust and Noise Generation

It is important that the Contractor follows the guidelines set out in the CONSTRUCTION MANAGEMENT SITE REGULATIONS OF 2022 (and all subsequent amendments) and overall good working practices throughout the construction phase. These shall include but not be limited to:

- Covering and/or wetting of all stockpiles and loose material when not in use
- Control of ground conditions to minimise dust dispersal
- Use of sprinkler systems if deemed necessary
- Use of dust suppression equipment for dust generating activities
- Covering of trucks carrying loose material before transportation off site
- Installation and use of wheel wash stations
- Regular maintenance of machinery, equipment and vehicles to minimise noise emissions
- Carrying out noise generating activities within the daylight hours

If the Contractor does adhere to the above, and other relevant practices, the severity of the adverse impact can be reduced to negligible.

6.1.1.2 Operational Phase

Intensification of Activity

During the operational phase, the following mitigation measures are recommended to reduce the impact of the presence of such a large development in a residential area:

- Proper site management and restriction of activities to the approved footprint
- Ongoing maintenance of landscaping and open spaces vegetation
- Traffic and access management
- Visual and noise mitigation to maintain land-use compatibility

If such measures are implemented and maintained throughout the operation of all components of the proposed development, the severity of the adverse impact can be reduced to minor.

6.1.2 Sea Use

6.1.2.1 Construction Phase

Marine Pollution

The Contractor is required to follow good working practices, most notably those outlined in the ENVIRONMENTAL CONSTRUCTION SITE REGULATIONS OF 2007 (S.L.552.09), to keep the marine pollution risks to a minimum. Such measures include:

- Onsite storage of liquids in spill trays or bunds at all times
- Onsite storage of liquids as far away from the sea as possible
- Provisions of easily accessible emergency spill kits
- Use of drip trays in the instance of leaking machinery and equipment
- Prompt repair of broken machinery and equipment
- Regular servicing and maintenance of machinery and equipment
- Designated hard standing maintenance and washing areas, located as far away from the sea as possible
- Maintenance of ground conditions to prevent thick accumulations of fine dust
- Containment of concrete washing residue
- Correct onsite storage of all waste and light-weight materials in designated areas away from the sea and in suitable receptacles that can be closed or covered

If the Contractor follows good working practices throughout the entire of the construction phase, the impact on the marine sea uses will reduce to be of minor significance.

6.1.2.2 Operational Phase

Marine Pollution

The operators of the proposed complex shall adopt environmentally responsible management practices to minimise the risk of marine pollution, with particular emphasis on the outdoor facilities located in close proximity to the coastline. Thorough housekeeping and maintenance procedures should be implemented to ensure that waste, chemicals, and other potential contaminants are appropriately managed and prevented from entering the marine environment.

In advance of forecast storm events, all loose furniture, equipment, and other movable items should be relocated away from the shoreline and securely anchored or stored to prevent their displacement by strong winds or wave action. The timely

implementation of these preventative measures will significantly reduce the potential for accidental marine pollution, resulting in a negligible residual impact.

Restoration of the Foreshore

The potential disturbance is expected to originate primarily from members of the public using the areas surrounding the complex, rather than from activities taking place within the development itself. To minimise this risk, informational signage can be installed at appropriate locations around the perimeter of the site, particularly along the foreshore, to promote responsible behaviour and raise awareness of the sensitivity of the surrounding environment.

Provided these measures are effectively implemented and respected by visitors, the residual impact is expected to be reduced to negligible significance.

6.2 MONITORING

It is recommended that general construction site monitoring is carried out during the construction phase. Such monitoring will ensure that the Contractor is abiding by the ENVIRONMENTAL CONSTRUCTION SITE REGULATIONS OF 2007 (S.L.552.09) to help keep the adverse land use impacts to a minimum.

Monitoring during the operational phase is not deemed necessary.

7 SUMMARY OF IMPACTS

TABLE 11: SUMMARY OF IMPACTS TABLE

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT AND SCALE							PROBABILITY OF IMPACT OCCURRING	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE
IMPACT TYPE	SPECIFIC INTERVENTION LEADING TO IMPACT	PROJECT PHASE	RECEPTOR TYPE	SENSITIVITY	DIRECT/INDIRECT/CUMULATIVE	EFFECT OF IMPACT BENEFICIAL/ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT/ MEDIUM/ LONG TERM	DURATION OF IMPACT TEMPORARY/ PERMANENT	REVERSIBLE/ IRREVERSIBLE				
Foreshore restrictions	Construction of the site	Construction	Foreshore	Moderate	Direct	Adverse	High	Site	Short term	Temporary	Reversible	Possible	Minor	Position hoarding to allow public access to foreshore (safety concerns permitting)	Negligible
Circulation restrictions	Construction of the site	Construction	Foreshore	Moderate	Direct	Adverse	Low	Surrounding area	Short term	Temporary	Reversible	Possible	Minor	Implementation of traffic management plan	Negligible
Dust and noise generation	Construction of the site	Construction	Surrounding land uses	Moderate	Direct	Adverse	Medium	Surrounding area	Short term	Temporary	Reversible	Inevitable	Minor	Follow L.N. 340 of 2022, Construction monitoring	Negligible
Marine pollution	Construction of the site	Construction	Marine area	High	Direct	Adverse	High	Nearby vicinity	Short term	Temporary	Irreversible	Possible	Moderate	Follow L.N. 340 of 2022, Construction monitoring	Minor
Redevelopment of abandoned site	Operation of the complex	Operation	Site	High	Direct	Beneficial	Medium	Site	Long term	Permanent	Irreversible	Inevitable	Major	N/A	Major
Intensification of land use activity	Operation of the complex	Operation	Site and surrounding land uses	High	Direct	Adverse	Medium	Site and local surrounding area	Long term	Permanent	Irreversible	Inevitable	Moderate	Appropriate operational management of the various facilities	Minor

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT AND SCALE							PROBABILITY OF IMPACT OCCURRING	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE
IMPACT TYPE	SPECIFIC INTERVENTION LEADING TO IMPACT	PROJECT PHASE	RECEPTOR TYPE	SENSITIVITY	DIRECT/INDIRECT/CUMULATIVE	EFFECT OF IMPACT BENEFICIAL/ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT/ MEDIUM/ LONG TERM	DURATION OF IMPACT TEMPORARY/ PERMANENT	REVERSIBLE/ IRREVERSIBLE				
Restored foreshore	Unrestricted foreshore access	Operation	Foreshore	High	Direct	Beneficial	Moderate	Site	Long term	Permanent	Irreversible	Inevitable	Major	N/A	Major
	Increased appeal of the open foreshore	Operation	Marine area	High	Indirect	Beneficial	Moderate	Nearby vicinity	Long term	Permanent	Irreversible	Likely	Moderate	N/A	Moderate
	Increased numbers of people using the foreshore	Operation	Marine area	High	Indirect	Adverse	Moderate	Nearby vicinity	Long term	Permanent	Irreversible	Likely	Minor	Informational signs to remind people of appropriate behaviour	Negligible
Marine pollution	Operation of the large complex	Operation	Marine area	High	Direct	Adverse	High	Nearby vicinity	Short term	Temporary	Irreversible	Possible	Minor	Appropriate operational management of the various facilities	Negligible

APPENDIX I

TERMS OF REFERENCE

The ERA issued the final Terms of Reference related to the study on land cover/uses for the EIA on the 30th May 2024. The relevant ToRs are replicated hereunder.

3.0 A DESCRIPTION OF THE SITE AND ITS SURROUNDINGS (I.E. ENVIRONMENTAL BASELINE)

The existing environmental features, characteristics and conditions, in and around the proposed development site as well as in all locations likely to be affected by the development or by ancillary interventions and operations, are to be identified and described in sufficient detail, with particular attention to the aspects elaborated further in the next sections.

The consultants should also identify (and justify) wherever relevant:

- 1. The geographic area (e.g. viewshed or other area of influence) that needs to be covered by each study;*
- 2. The relevant sensitive receptors vis-à-vis the environmental parameter under consideration (e.g. residential communities, other users, natural ecosystems, specific populations of particular species, or individual physical features);*
- 3. The location of the reference points or stations (e.g. viewpoints, monitoring stations, or sampling points (including depth of multiple sampling points at a single sampling point in the case of water media and sediment, where applicable) to be used in the study; and*
- 4. Other methodological parameters of relevance, also noting that the assessment will normally require both desk-top studies and on-site investigations (including visual observations and sampling, as relevant).*

Note: *It is recommended that these details are discussed in advance with the ERA prior to commencement of the relevant parts of the studies, in order to pre-empt (as much as possible) later-stage issues.*

Wherever relevant to the environmental aspects under discussion, reference to legislation, policies, plans (including programmes and strategies) standards and targets, should also be made, such that the compatibility (or otherwise) of the proposal therewith is also factored into the assessment required by Section 4 below. The discussion should cover the following aspects, in the appropriate level of detail:

- 1. Supra-national (e.g. European Union; United Nations; or other international or regional) legislation, directives, policies, conventions, protocols, treaties, charters, plans and obligations;*
- 2. National legislation, policies and plans (e.g. National Environment Policy); and*
- 3. Sub-national legislation, policies and plans (e.g. local plans, site-specific regulations, action plans, management plans, and protective designations such as scheduling or Natura 2000).*

Note: *In addition to already in-force legislation, policies and plans, the discussion should also cover any foreseeable future updates (or new legislation, policies and plans) likely to be fulfilled, affected or compromised by the proposed project.*

Furthermore, it should be noted that some cross-cutting legal/policy instruments (e.g. Water Framework Directive and Marine Strategy Framework Directive) may need to be factored into more than one aspect of the discussion.

3.1 Land Cover and Land/Sea Uses

A description of the land cover and land uses (and/or sea uses, as relevant) within the area of influence of the project, including roads, footpaths and public access routes. Details including nature, magnitude, proximity to site, etc. should be included.

4.0 ASSESSMENT OF ENVIRONMENTAL IMPACTS AND ENVIRONMENTAL RISKS

All likely significant effects and risks posed by the proposed project on the environment during all relevant phases (including construction/ excavation/ demolition, operation and decommissioning) should be assessed in detail, taking into account the information emerging from Sections 1, 2 and 3 above. Apart from considering the project on its own merits (i.e. if taken in isolation), the assessment should also take into account the wider surrounding context and should consider the limitations and effects that the surrounding environmental constraints, features and dynamics may exert on the proposed development, thereby identifying any incompatibilities, conflicts, interferences or other relevant implications that may arise if the project is implemented.

In this regard, the assessment should address the following aspects, as applicable for any category of effects or for the overall evaluation of environmental impact, addressing the worst-case scenario wherever relevant:

- 1. An exhaustive identification and description of the envisaged impacts;*
- 2. The magnitude, severity and significance of the impacts;*
- 3. The geographical extent/range and physical distribution of the impacts, in relation to: site coverage; the features located in the site surroundings; whether the impacts are short-, medium- or long-range; and any transboundary impacts (i.e. impacts affecting other countries);*
- 4. The timing and duration of the impacts (whether the impact is temporary or permanent; short-, medium- or long-term; and reasonable quantification of timeframes);*
- 5. Whether the impacts are reversible or irreversible (including the degree of reversibility in practice and a clear identification of any conditions, assumptions and pre-requisites for reversibility);*
- 6. A comprehensive coverage of direct, indirect, secondary and cumulative impacts, including:*
 - interactions (e.g. summative, synergistic, antagonistic, and vicious-cycle effects) between impacts;*
 - interactions or interference with natural or anthropogenic processes and dynamics;*
 - cumulation of the project and its effects with other past, present or reasonably foreseeable developments, activities and land uses and with other relevant baseline situations; and*

- *wider impacts and environmental implications arising from consequent demands, implications and commitments associated with the project (including: displacement of existing uses; new or increased pressures on the environment in the surroundings of the project, including pressures which may be exacerbated by the proposal but of which effects may go beyond the area of influence; and impacts of any additional interventions likely to be triggered or necessitated by situations created, induced or exacerbated by the project);*
- 7. *Whether the impacts are adverse, neutral or beneficial;*
- 8. *The sensitivity and resilience of resources, environmental features and receptors vis-à-vis the impacts;*
- 9. *Implications and conflicts vis-à-vis environmentally-relevant plans, policies and regulations;*
- 10. *The probability of the impacts occurring; and*
- 11. *The techniques, methods, calculations and assumptions used in the analyses and predictions, and the confidence level/limits and uncertainties vis-à-vis impact prediction.*

The impacts that need to be addressed are detailed further in the sub-sections below.

5.0 REQUIRED MEASURES, IDENTIFICATION OF RESIDUAL IMPACTS, AND MONITORING PROGRAMMES

5.1 Mitigation Measures

A clear identification and explanation of the measures envisaged to prevent, eliminate, reduce or offset (as relevant) the identified significant adverse effects of the project during all relevant phases including construction, operation and decommissioning [see Section 1.2.3 above].

As a general rule, mitigation measures for construction-phase impacts should be packaged as a holistic Construction Management Plan (CMP). Whilst the detailed workings of the CMP may need to be devised at a later stage (e.g. after the final design of the project has been approved and/or after a contractor has been appointed), the key parameters that the CMP must adhere to for proper mitigation need to be identified in the EIA. Broadly similar considerations also apply vis-à-vis operational-phase impacts [which may need to be mitigated through an operational permit] and decommissioning-phase impacts [see Section 5.4 below], where relevant.

Mitigation measures for accident/risk scenarios should be packaged as a holistic plan that includes the integration of failsafe systems into the project design as well as well-defined contingency measures.

The recommended measures should be feasible, realistically implementable to the required standards and in a timely manner, effective and reliable, and reasonably exhaustive. They should not be dependent on factors that are beyond the developer's and ERA's control or which would be difficult to monitor, implement or enforce. The actual scope for, and feasibility of, effective prevention or mitigation should also be

clearly indicated, also identifying all potentially important pre-requisites, conditionalities and side-effects.

5.2 Residual Impacts

Any residual impacts [i.e. impacts that cannot be effectively mitigated, or can only be partly mitigated, or which are expected to remain or recur again following exhaustive implementation of mitigation measures] should also be clearly identified.

5.3 Additional Measures

Compensatory measures (i.e. measures intended to offset, in whole or in part, the residual impacts) should also be identified, as reasonably relevant. Such measures should be not considered as an acceptable substitute to impact avoidance or mitigation.

If the assessment also identifies beneficial impacts on the environment, measures to maximise the environmental benefit should also be identified.

In both instances, the same practical considerations as indicated vis-à-vis mitigation measures should also apply.

5.4 Monitoring Programme

A realistic and enforceable programme for effective monitoring of those works envisaged to have an adverse or uncertain impact. The monitoring programme should include:

- 1. Details regarding type and frequency of monitoring and reporting, including spot checks;*
- 2. The parameters that will be monitored, their units of measurement, the monitoring indicators to be used; and standard analytical methods in line with relevant EU policy;*
- 3. An effective indication of the required action to address any exceedances, risks, mitigation failures or non-compliances for each monitoring parameter;*
- 4. An evaluation of forecasts, predictions and measures identified in the EIA; and*
- 5. An indication of the nature and extent of any additional investigations (including EIAs or ad hoc detailed investigations, if relevant) that may be required in the event of any contingencies, unanticipated impacts, or impacts of larger magnitude or extent than predicted.*

The programme should address all relevant stages, as follows:

- a. Where relevant, monitoring of preliminary on-site investigations that may entail significant disturbance or damage to site features (e.g. archaeological excavations, geological sampling, or any works that require prior site clearance or any significant destructive sampling); [Note: Official written*

consent from the competent authorities (e.g. Superintendence of Cultural Heritage) may also be required for such interventions.]

- b. Monitoring of the construction phase, including the situation before initiation of works (including site clearance), during appropriate stages of progress, and after completion of works;*
- c. Monitoring of the operational phase, except where otherwise directed by ERA (e.g. where monitoring would be more appropriately integrated into an operating permit); and*
- d. Where relevant, monitoring of the decommissioning phase, including the situation before initiation of works, during appropriate stages of progress, and after completion of works.*

5.5 Identification of required authorisations

The assessment should also identify all environmentally-relevant permits, licences, clearances and authorisations (other than the development permit to which this EIA is ancillary) which must be obtained by the applicant in order to effectively implement the project if development permission is granted. Any uncertainty, as to whether any of these pre-requisites is applicable to the project, should be clearly stated.

Note on Sections 5.1 to 5.6 above:

The expected effects, the proposed measures, the residual impacts, the proposed monitoring etc. should also be summarised in a user-friendly itemised table that enables the reader to easily relate the various aspects to each other.

APPENDIX 2

LARGE-SCALE LAND/SEA USE MAP

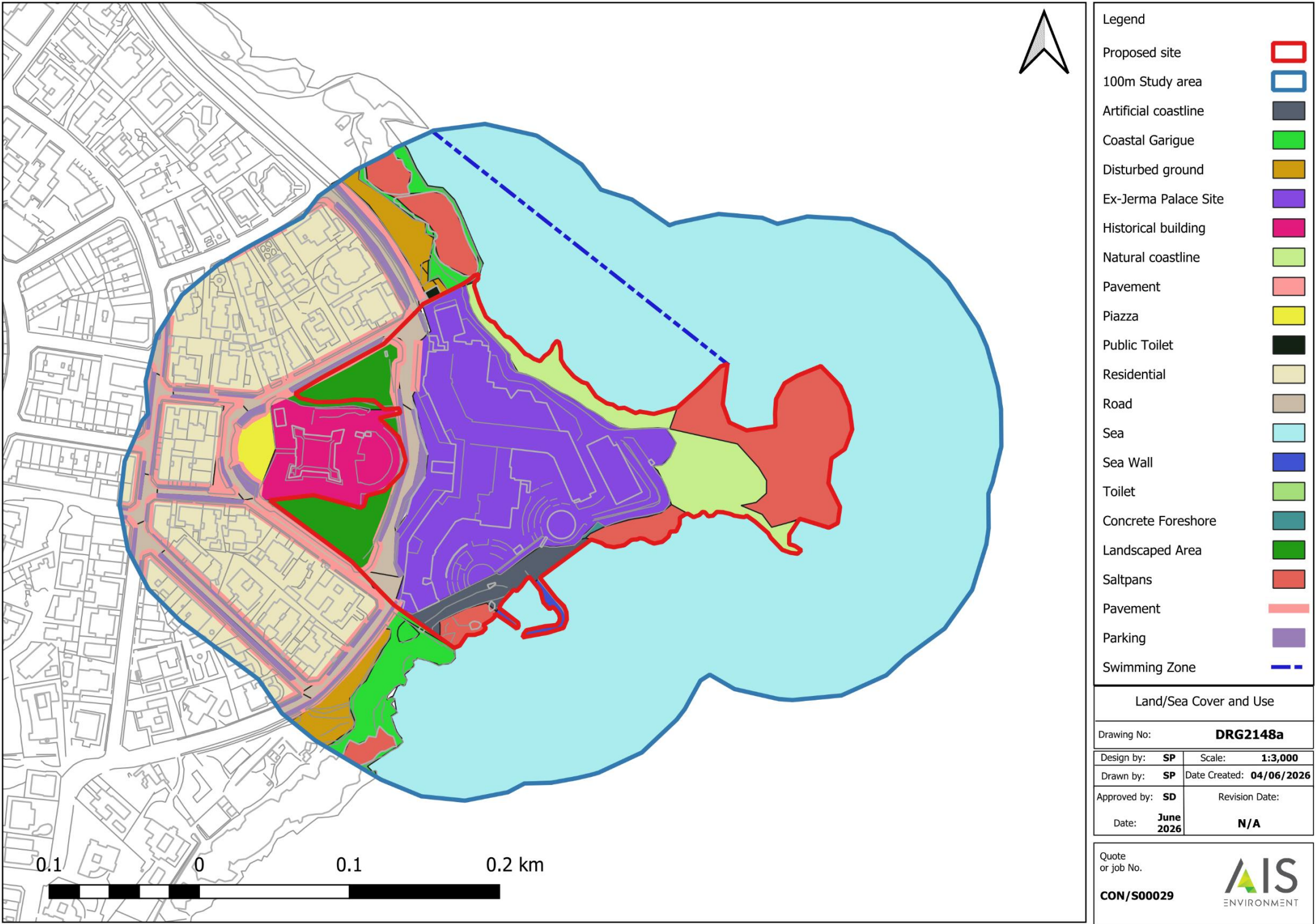


FIGURE 27: LARGE-SCALE LAND-USE MAP