



Architectural, Archaeological, Historical
& Cultural Heritage and Related
Material Assets Study

As per ERA requirements for PA 00437/23

Technical Report



ARCHITECTURAL, ARCHAEOLOGICAL, HISTORICAL &
CULTURAL HERITAGE AND RELATED MATERIAL
ASSETS STUDY

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1 INTRODUCTION

The proposed development, hereinafter referred to as the “Scheme”, involves the demolition of the ex-Jerma Palace Hotel and construction of a mixed-use resort. This technical report comprises an archaeological and cultural heritage baseline study of the proposed Scheme, based on an assessment of reviewed records held by national inventories and secondary sources relating to the historic environment of the area.

This archaeological and cultural heritage baseline also includes an assessment of the value and sensitivity of any identified cultural heritage assets within the Scheme and additional 100m wide buffer distance, supported by a field survey of the proposed construction footprint and surrounding area (Section 5.1). The conclusions and findings of this report may be used to assist and inform the planning process for the proposed project, any eventual monitoring programme or further development.

1.1 THE SCHEME

The Scheme (Figure 1) involves the demolition of the ex-Jerma Palace Hotel, excavation of site and construction of a mixed-use resort consisting of:

- 155 Residential Units (Class 1);
- tourism accommodation (Class 3b): 258 Serviced Apartments and a 134 Room 5 Star Hotel;
- retail (Class 4B) and Food & Beverage outlets (Class 4C and Class 4D);
- a below grade shopping mall (Class 4B);
- 570 Parking spaces;
- 13,600sqm of open space available to the general public.

The proposal consists of the construction of a two-storey basement below the landscaped public plaza and two eight storey blocks above the plaza, extensive landscaping works, repairs and changes to the existing coastal defences and the construction of a swimming pool on the existing concrete platform below the project. The proposed masterplan and elevations are shown in the below Figure 2Figure 3Figure 4.

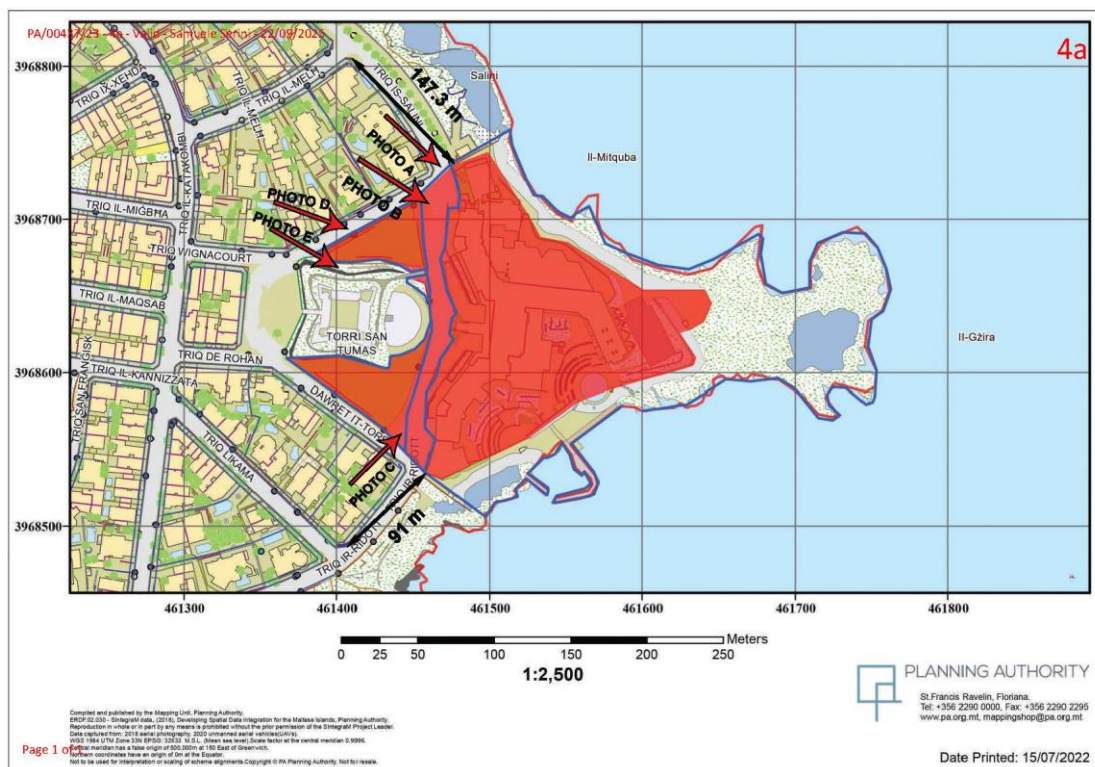


FIGURE 1: AREA OF PROPOSED DEVELOPMENT (SOURCE PA SERVER)



FIGURE 2: PROPOSED PLAN OF PLAZA AND TWO EIGHT STOREY BLOCKS (MASTERPLAN)

PROPOSED 3D - 444 (ARCHITECTURE) 01/2022

96a

NORTH BLOCK

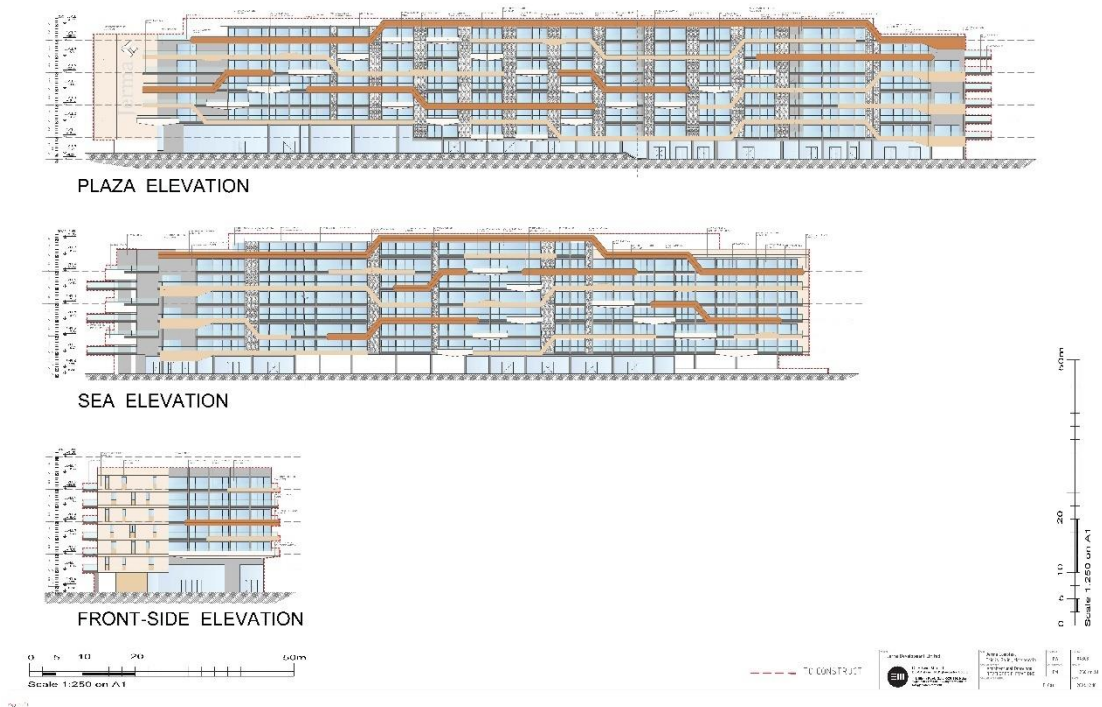


FIGURE 3: PROPOSED ELEVATION OF NORTH BLOCK (SOURCE: PA SERVER)

PROPOSED 3D - 444 (ARCHITECTURE) 01/2022

96b

SOUTH BLOCK

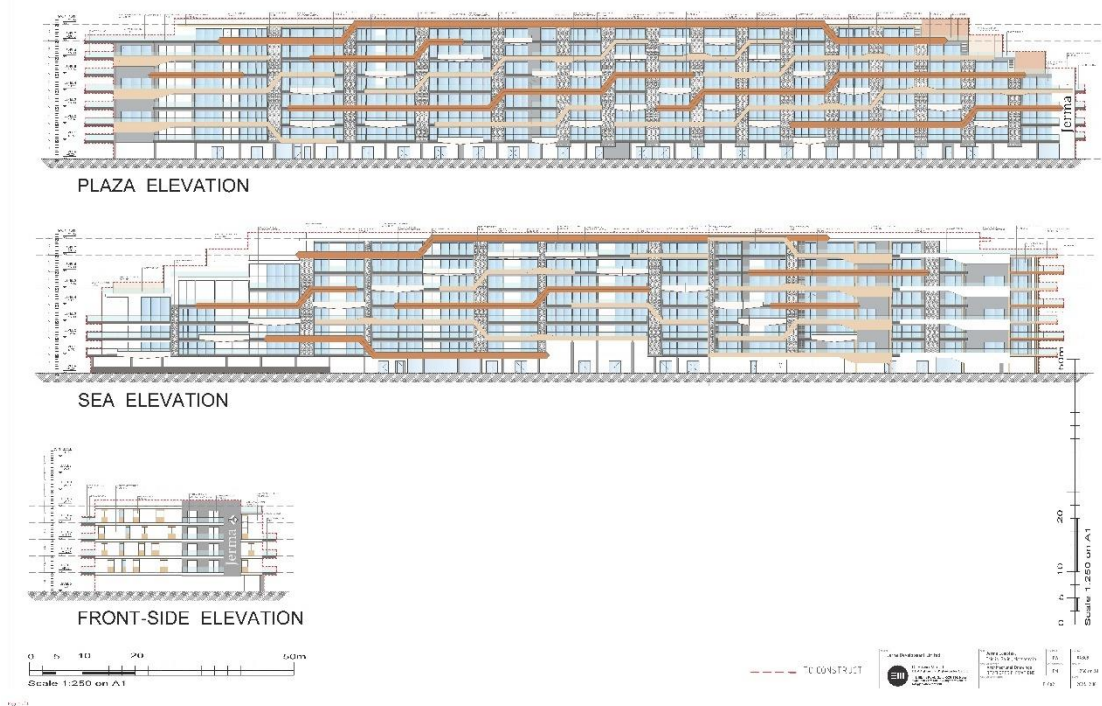


FIGURE 4: PROPOSED ELEVATION OF SOUTH BLOCK (SOURCE: PA SERVER)

1.2 SCOPE OF DOCUMENT

The specific aim of this assessment is to summarise the known and potential cultural heritage and archaeological baseline within the Scheme area to subsequently inform the EIA.

The objectives of the assessment are to produce details of relevant legislations, national and local planning policy, and best practice guidance and assess the significance of the known and potential cultural heritage and archaeological resources through weighted consideration of their valued components.

1.3 TERMS OF REFERENCE

The Terms of Reference related to the study on architectural, archaeological, historical & cultural heritage and related material assets for the EIA were issued by the ERA in May 2024 and can be found in Paragraph 3.6 and Appendix 2, replicated hereunder.

APPENDIX 2: TERMS OF REFERENCE FOR A CULTURAL HERITAGE ASSESSMENT (AS PROVIDED BY THE SUPERINTENDENCE OF CULTURAL HERITAGE, AS REVISED IN OCTOBER 2013).

1.0 Preamble

The proposed project would involve development over an extensive area and may lead to intensification of activity over a larger area. Potential impacts may occur within the footprint of the project, in the immediate environs, and along access routes to the site. Potential impacts may include direct and immediate material impacts, as well as subsequent impacts that might arise from the modification of the existing situation.

2.0 Scope and Definitions of the EIA

For the purposes of this document, cultural heritage is defined by Article 2 of the Cultural Heritage Act (2019). This includes movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, paleontological and geological importance.

2.1 The study area shall include the total footprint of the proposed development.

2.2 In the context of this particular application, cultural heritage considerations may include:

- Features of archaeological value and potential;
- Military or civil architecture from the Knights period to British period;
- Vernacular structures; and
- Field systems and agricultural features such as irrigation systems.

The above cultural heritage definitions and considerations are not to be considered as exhaustive. The EIA must consider all other forms of cultural heritage, both known and unknown.

2.3 The Environmental Impact assessment will:

- Describe the Cultural Heritage assets within the study area;
- Analyse the cultural heritage features within the context of the cultural landscape;
- Assess the physical, spatial and visual impacts of the proposed development on the cultural heritage assets; and
- Propose corrective measures for the protection of the cultural resources.

3.0 Methodology

In quantifying the cultural heritage assets within the study area, and assessing the impacts of the proposed development, the EIA will undertake:

- Description and assessment of the property;
- Desktop and archival research limited to the study area;
- Fieldwork and research, including “field walking”, topographic survey and remote sensing as may be necessary within the site. All fieldwork has to be authorised by the Superintendence of Cultural Heritage as defined below under point 4;
- Consultations with any relevant bodies, including the Superintendence of Cultural Heritage, Heritage Malta, the University of Malta, NGOs and Local Councils;
- Compilation of an inventory of the cultural heritage assets identified within the study area. The features of cultural heritage are to be described and plotted with grid references, on Data Capture Sheets, the design of which should be approved in advance by the Superintendence of Cultural Heritage. The Data Capture Sheets will be presented as an appendix to the EIS. The analysis of the features will be included in the main report; and
- A cultural heritage Risk Assessment Map examining the various impacts of the proposed project is to be included in the EIA.

4.0 Authorisation by the Superintendence of Cultural Heritage

As per Cultural Heritage Act 2019, any form of investigation or prospection required for the identification of cultural heritage (including excavation, field walking, topographic survey and remote sensing) may only be undertaken by the Superintendence of Cultural Heritage or with its written approval.

1.4 AREA OF INTEREST

This site of proposed development is located at Jerma Hotel, Dawret it-Torri, Triq is-Salini, Triq ir-Ridott, Marsascala.

The Area of Interest (AoI) for the study comprises the Scheme site together with a 100m buffer zone around the proposed site. The AOI is mapped in Figure 5.

The AoI consists of:

- the ex-Jerma Palace Hotel, abandoned and in state of disrepair;
- the headland of Ras il-Gzira (Gzira point) and surrounding low cliffs and ancient salt pans;
- the extents of St. Thomas Tower and Battery, a scheduled site/monument (Grade 1, G.N. 729 of 1995) recently restored;
- residential area composed of bungalows, villas and terraced development along the western part of the promenade (Triq is-Salini and Triq ir-Ridott).



FIGURE 5: AREA OF INFLUENCE

1.4.1 Site Description

The site proposed for development is a built-up area currently occupied by the former four-stars Jerma Palace Hotel, a Libyan investment opened in 1982, closed down and abandoned since 2007.

The building complex (Figure 6) consists in approx. 8,900 sqm unbuilt, landscaping and open-air facilities and approx. 8,700 sqm building composed of two five-storey wings (former hotel rooms) joining in a three-storey structure formerly used as reception, lounge area and offices, and an additional one-storey building originally consisting in an indoor pool, gym and restaurant. The building complex, with a maximum height of 25.5m above mean sea level, overlooks the northern and southern coast of the headland, blocking any clear view of the St Thomas Tower from the sea, and vice versa.



FIGURE 6: FORMER JERMA PALACE HOTEL, EXISTING BLOCK PLAN (SOURCE: PA SERVER)

The building complex is currently in a derelict state (Figure 7Figure 12). The external walls, partially covered in graffiti, are collapsed or in danger of collapsing. Despite the area being closed to the public, it became an illegal dumping ground which caused a number of fires and other safety issues over the last decade.

The site also comprises the headland of Gzira point, still easily accessible from an access located in Triq is-Salini, south to the Hotel (Figure 10 Figure 12); the southern portion of triq is-Salini and the Eastern, Northern and Southern limits of St. Thomas Tower and Battery, which are discussed in the following chapters.



FIGURE 7: JERMA PALACE HOTEL FROM TRIQ IS-SALINI, LOOKING EAST



FIGURE 8: JERMA PALACE HOTEL FROM TRIQ IS-SALINI, LOOKING EAST



FIGURE 9: NORTHERN VIEW OF JERMA PALACE HOTEL FROM TRIQ IS-SALINI, LOOKING SOUTH



FIGURE 10: GENERAL VIEW OF JERMA PALACE HOTEL FROM SOUTHERN FORESHORE, LOOKING N-WEST



FIGURE 11: GENERAL VIEW OF JERMA PALACE HOTEL FROM GZIRA POINT, LOOKING WEST



FIGURE 12: GENERAL VIEW OF JERMA PALACE HOTEL FROM GZIRA POINT, LOOKING WEST

2 METHODOLOGY

The study within the area shown in Figure 5 includes the study of architectural, archaeological, historical and cultural heritage and related material assets. The cultural heritage assessment includes a survey of the AoI, which consists of a non-intrusive site inspection, and a desktop study of the tangible and intangible cultural heritage assets, including cultural landscapes, within the AoI.

2.1 DESKTOP STUDY

The methodology employed for the assessment of the cultural heritage in this area first involves a desktop study. This stage includes:

- A thorough review of national, regional and local planning, and legislative framework governing the protection and treatment of cultural heritage within the planning process (Chapter 3);
- A thorough literature review of published literature and previous reports carried out in the AoI and surroundings (Chapter 4).

The literature review set the historical context of the area and delve into the cultural heritage considerations as defined by Article 2 of the CULTURAL HERITAGE ACT 2002 (Cap. 445).

Existing and available information was consulted, giving importance to cartographic material, archival documents, toponymy, photographic and any other graphic material (including relevant diagrams and sketches), and international and local statutory protection. This documentation aided in the compilation of information on any identified features which may include potential cultural heritage, military and civil architecture, underwater archaeological remains and coastal structures, and the definition of areas of high archaeological value and potential.

Research was conducted by taking into consideration historical events which occurred within the earmarked area including the archaeological, historical and cultural use of the area.

A number of publicly accessible sources of primary and synthesized information were consulted, including:

- National heritage datasets including the National Inventory for Malta and Scheduling (HS) constraints available on the Planning Authority (PA) Geoportal and on the Superintendence of Cultural Heritage (SCH) website and GIS interface;
- Relevant mapping including survey maps and Local Plans; and
- Relevant documentary sources, including Museum Annual Reports (MAR) and grey literature.

A bibliography of documentary, archive, and cartographic sources consulted is included in the Appendix section of this report.

2.2 SITE INSPECTION

In order to conclude the survey on the cultural heritage assets present within and in proximity of the AoI, the site was inspected on the 29/11/2024. The aim of the inspection was to systematically identify and record any cultural/historical features visible in the landscape and identify potential for unknown cultural heritage assets.

A photographic record using OM SYSTEM TG-7 camera with 4x wide optical 4.5-18mm zoom lens was made for each area visited and any identified cultural heritage assets.

2.3 EVALUATION

Following the completion of both desktop study and survey, the Impact Assessment was carried out in order to determine any effects that the project may have on the identified cultural features and the surrounding landscape, and therefore the steps necessary to mitigate them. This evaluation takes in consideration local and international legislations and other relevant documents related to the protection of cultural heritage.

The section addressing the cultural landscape should be read in conjunction with, and as a continuation of the Landscape and Visual Impact technical study.

3 LEGISLATION AND STATUTORY PROTECTION

The following section provides a summary of the national, regional and local planning, and legislative framework governing the protection and treatment of cultural heritage within the planning process.

3.1 DEVELOPMENT PLANNING ACT, 2016

This Act aims at implementing a comprehensive planning system by means of a Spatial Strategy which regulates “the sustainable management of land and sea resources covering the whole territory of the Maltese Islands” (44.1). As per DIRECTIVE 2014/52/EU (which supersedes DIRECTIVE 2011/92/EU), Environment Impact Assessments are required to provide high level protection to the environment and human health and ensure that projects which are likely to have significant effects on the environment are adequately assessed before any development consent is granted.

The Superintendence of Cultural Heritage provides professional and expert advice to the Planning Authority on matters relating to the protection of the cultural heritage within the Executive Council. The Executive Council has the authority to publish and upkeep lists of areas and sites of archaeological and architectural importance that require scheduling for preservation. The scheduling mechanism facilitates the task of planners in granting development applications.

3.2 STRATEGIC PLAN FOR DEVELOPMENT AND ENVIRONMENT, AND STRUCTURE PLAN FOR THE MALTESE ISLANDS

The Structure Plan was drafted in 1990 with the aim to control development and channel it into existing and committed urban areas and to improve the quality of all aspects of the environment of both urban and rural areas. It has been superseded by the 2015 STRATEGIC PLAN FOR DEVELOPMENT AND THE ENVIRONMENT (SPED). The SPED safeguards architectural heritage through Thematic Objective 8, placing emphasis on the context and setting of sites with heritage value and advocating a reappraisal of such sites based on these criteria.

However, the SPED does not provide guidance on the classification of cultural and archaeological features. Therefore, reference will be made to the STRUCTURE PLAN FOR THE MALTESE ISLANDS, which remains as a guide to development proposals on scheduled buildings. Relevant for this study are the provisions of policy UC07 of the 1992 STRUCTURE PLAN (Table 1).

Chapter 15 of 1992 STRUCTURE PLAN sets out criteria to determine areas/assets of cultural significance, including Urban Conservation Areas; Listed Buildings; Rural Conservation Areas; Areas and Sites of Archaeological Importance; and Marine Conservation Areas.

TABLE 1: SUMMARY OF PROTECTION RATING AS DESCRIBED IN POLICY UCO7 OF THE STRUCTURE PLAN FOR THE MALTESE ISLANDS

PROTECTION RATING	DESCRIPTION IN POLICY UCO 7 OF THE STRUCTURE PLAN FOR THE MALTESE ISLANDS (1992)
Grade 1	“These are buildings of outstanding historical or architectural interest that demand to be preserved in their entirety. Demolition or alterations which impair the setting or change the external or internal appearance, including anything contained within the curtilage of the building, will not be allowed. Any interventions allowed must be directed to their scientific restoration and rehabilitation. Internal structural alterations will only be allowed in exceptional circumstances where this is paramount for reasons of keeping the building in active use.”
Grade 2	“These are buildings of some architectural or historical interest or which contribute to the visual image of an Urban Conservation Area. Permission to demolish such buildings will not normally be given. Alterations to the interior will be allowed if proposed to be carried out sensitively and causing the least detriment to the character and architectural homogeneity of the building.”
Grade 3	“These are buildings which have no historical importance and are only of minor architectural interest. Demolition may be permitted provided the replacement building is in harmony with its surroundings.”

Furthermore, Chapter 15 also contains policies specifically related to the classification of archaeological features, namely: Policy ARC 2; Policy ARC 3; Policy ARC 6 and Policy ARC 7.

POLICY ARC 2 provides for a four-tier classification system, with Class A representing the top priority sites/features, where development will not be allowed since it would adversely affect the natural setting of the site/feature. The policy prescribes a development-free buffer zone of at least 100 m around the periphery of a Class A site/feature. Class B sites/features are regarded as very important, to be preserved at all costs, where adequate measures must be taken to preclude any damage from immediate development. While for Class C sites/features, every effort must be made for preservation, even though it is considered a possibility to cover them up after proper investigation, documentation and cataloguing, with provision for subsequent access being provided. Finally, Class D sites/features may be covered up or destroyed after recording.

POLICY ARC 3 refers to “... development affecting ancient monuments and important archaeological areas and sites, including areas and sites having such potential, will normally be refused if there is an overriding case for preservation. Where there is no overriding case for preservation, development of such sites will not normally be

permitted until adequate opportunities have been provided for the recording and, where desirable, the excavation of such sites”.

POLICY ARC 6 states that “all sites recorded In the National Protective Inventory will be protected in accordance with Development Planning Act powers and by reference to the ratings given In Policy ARC 2”.

POLICY ARC 7 states that “the Planning Authority will adopt, maintain and extend the National Protective Inventory by initiating a programme of further Investigation of recorded categories”.

3.3 PA CIRCULAR 3/20 - ASSESSING AND DETERMINING DEVELOPMENT APPLICATIONS IN THE SETTING OF SCHEDULED BUILDINGS AND MONUMENTS

This document was adopted to provide additional focus to ensure that the visual integrity of scheduled buildings/monuments is not impacted. It provides definitions of the main terms that are considered the most relevant in assessing criteria for development in the setting of scheduled buildings, namely:

- Character: “... group of unique qualities derived from the past uses, associations, visual aspects, features, materials and spaces of a heritage asset. This term is often used in relation to entire historic areas and landscapes to which heritage assets and their setting may contribute.”;
- Context/Setting: “means the wider setting within which a project/development is to be located, ranging from the immediate street environment to the urban settlement at large, which is affected and impacted upon by such development to varying degrees (depending on the scale of the proposed development). In relation to scheduled buildings, this is the relationship between a heritage asset and the site or area that is in its immediate or extended environment....”;
- Immediately contiguous: “any sites which lie within the context of a site”;
- Integrity: “Historical/architectural integrity is derived from the original, and subsequent, design choices and values, including landscape, architecture and structure, and conserving those basic ideas in their most authentic state. It is a measure of the overall coherence, wholeness, intactness and honesty of the property and its attributes.”;
- Proximity: “A measure of distance that must be regulated in line with strict parameters to respect the sensitivity and character of the area surrounding a building, thereby maintaining its essential characteristics vis-à-vis the building it surrounds”;
- Transition zones/areas: “are areas surrounding a protected area (scheduled building or UCA) which may be delineated and established.”

As per para 5.1, when dealing with heritage items and scheduled buildings, the assessment must also take into consideration the impacts that a development might have on the context of the scheduled building. In this respect, the

context of a scheduled building should be treated as a transition area so that the impacts of a development can be mitigated.

3.4 2019 CULTURAL HERITAGE ACT (AMENDED)

The management and protection of cultural heritage is legally covered by the CULTURAL HERITAGE ACT 2002, amended in 2019.

Cultural heritage is defined as *“movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, palaeontological and geological importance and includes information or data relative to cultural heritage pertaining to Malta or to any other country. This includes archaeological, palaeontological or geological sites and deposits, landscapes, groups of buildings, as well as scientific collections, collections of art objects, manuscripts, books, published material, archives, audio-visual material and reproductions of any of the preceding, or collections of historical value, as well as intangible cultural assets comprising arts, traditions, customs and skills employed in the performing arts, in applied arts and in crafts and other intangible assets which have a historical, artistic or ethnographic value”* (Part 1.2)

The act specifies that Cultural Heritage has priority in deciding public policy in all fields of activity in Malta (Art. 6) and that the Superintendence of Cultural Heritage (SCH) has functions of regulator of Cultural Heritage (Art. 7). Within the development sector the SCH has the power to advise and coordinate with the Planning Authority action in safeguarding cultural heritage when considering applications for planning permission relating to the cultural heritage. The Cultural Heritage Act states that the proper use and protection of national cultural property shall be in conformity with the provisions of international conventions ratified by the Government of Malta

‘The powers and duties under this Act shall be exercised in conformity with any international convention, treaty, agreement or instrument concerning the proper use and conservation of national or world cultural property to which Malta may be a party.’

3.5 INTERNATIONAL CONVENTIONS

The EUROPEAN CONVENTION ON THE PROTECTION OF THE ARCHAEOLOGICAL HERITAGE (Revised) Valletta 1992 (VALLETTA CONVENTION 1992), focusses on the conservation and enhancement of the archaeological heritage within urban and regional planning policies. The Articles of the VALLETTA CONVENTION tackle various aspects:

- Article 1 deals with the inventorying and protection of sites and areas;
- Article 2 deals with the mandatory reporting of chance finds and providing for ‘archaeological reserves’ on land or underwater;
- Article 3 promotes high standards for all archaeological work undertaken by suitably qualified people;
- Article 4 requires the conservation of excavated sites and the safe keeping of finds; and,

- Article 5 is concerned with consultation that should take place between planning authorities and developers to avoid damage to archaeological remains.

Malta has signed and ratified this convention, along with the following:

- EUROPEAN CULTURAL CONVENTION 1954.
- GRANADA CONVENTION 1985 on the Protection of the Architectural Heritage of Europe.

3.6 LOCAL POLICY

The Local Plan afford protection to sites/monuments through the designation of Urban Conservation Areas (UCA), Visual Integrity Buffer Zone Areas and Areas of High Landscape Value.

The 2006 SOUTH MALTA LOCAL PLAN (SMLP) is of specific interest, since it contains the relevant policy to the proposed area of development. In this regard, the policies that are worth mentioning are:

- Policy SMSE 03 Building Heights: identifies Marsascala as a locality where medium-rise buildings can be considered (SMLP 2006: 9);
- Policy 'SMSE 04 Public Urban Open Spaces, Squares and Green Areas: designates the coastal zone which the Ex-Jerma Palace Hotel abuts as a green area whereby only low-key environmental improvements or upgrading of permitted buildings that are already present on site will be considered (SMLP 2006: 11);
- Policy 'SMMS 13 St. Thomas Tower' encourages the use of the historical tower as a cultural heritage attraction with ancillary visitor facilities, including a catering operation (SMLP 2006: 125);
- Policy 'SMMS 15 Development Brief for Jerma Palace Hotel Site', requires the submission of a Development Brief following the drawing up of terms of reference by the Planning Authority (SMLP 2006: 125-126).

According to maps MS1 and MS2 (Figure 13 Figure 14), the policy maps for Marsascala, zone the immediate surroundings of the Ex-Jerma Palace Hotel site as a Residential Priority Area (RPA); while the area at the back of the RPA is designated as a residential area (RA). Map MS3 (Figure 15), the Marsascala building height map, indicates the part of the RPA area fronting the sea-front as a bungalow area with a building height of 1 floor and semi-basement. The remaining area of the RPA is designated as a villa area where a building height of 2 floors plus semi-basement applies. The building height map does not indicate a specific building height limitation for the site of policy SMMS 15.

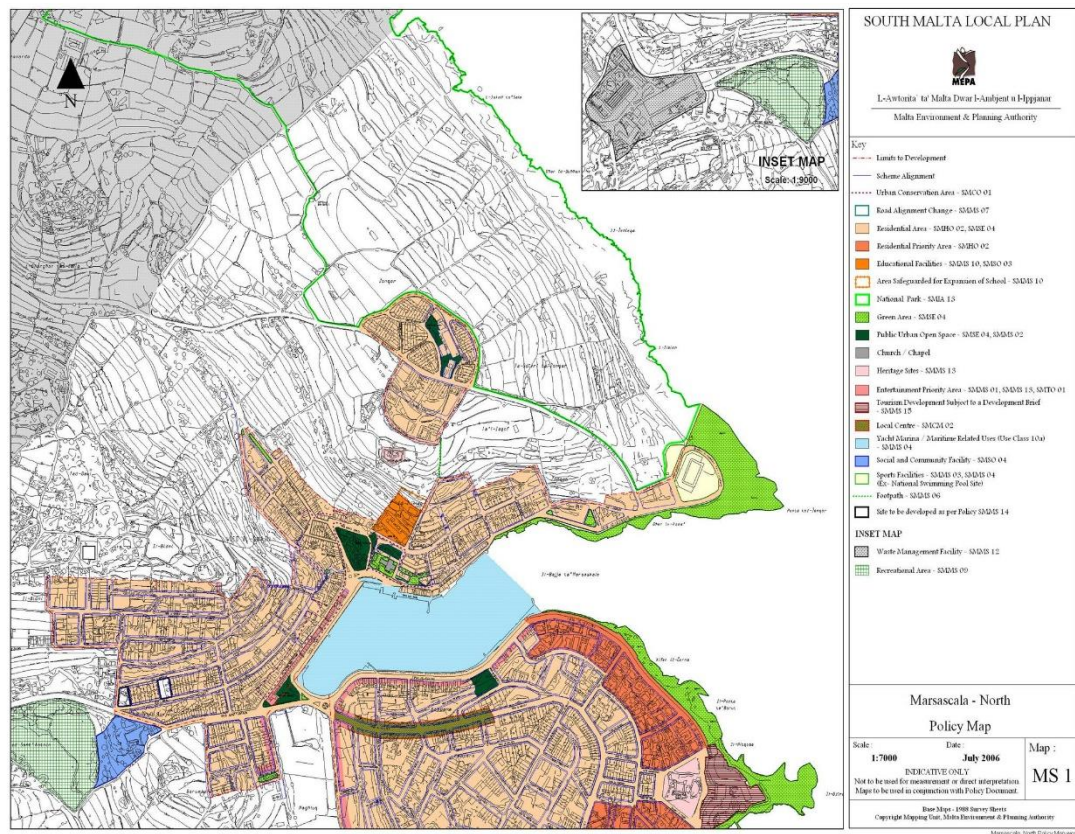


FIGURE 13: SMLP 2006, POLICY MAP MS1

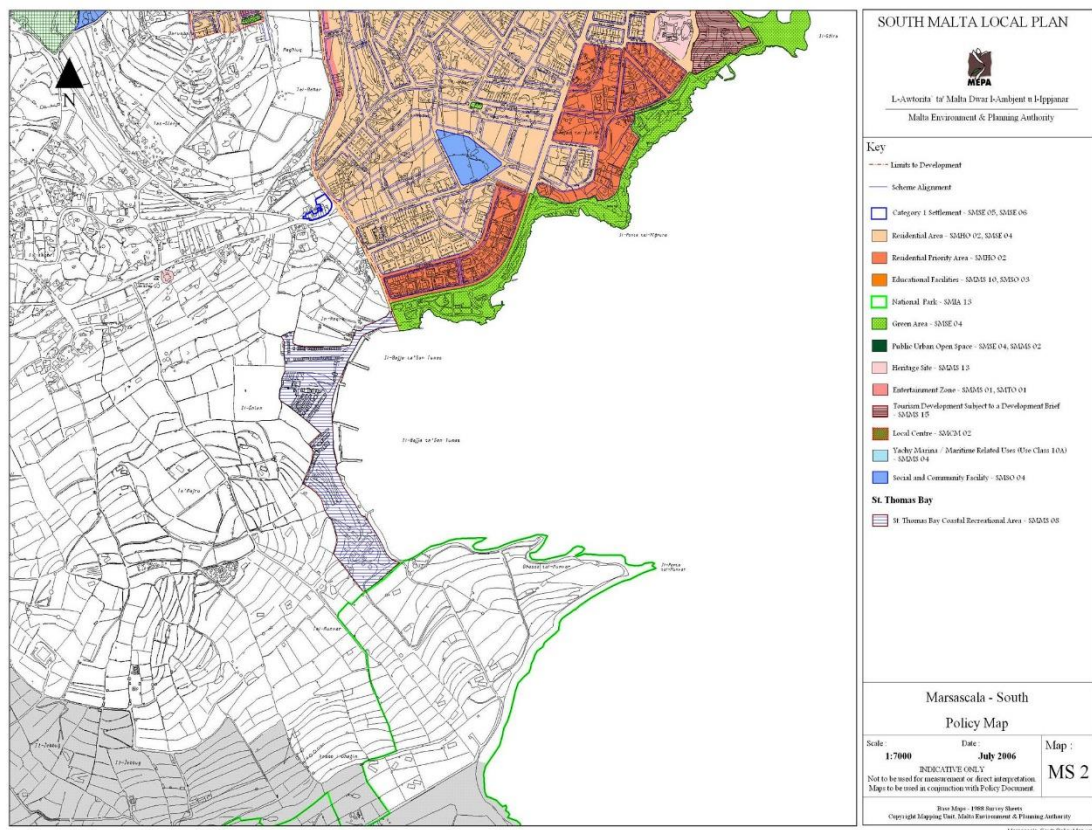


FIGURE 14: SMLP 2006, POLICY MAP MS2

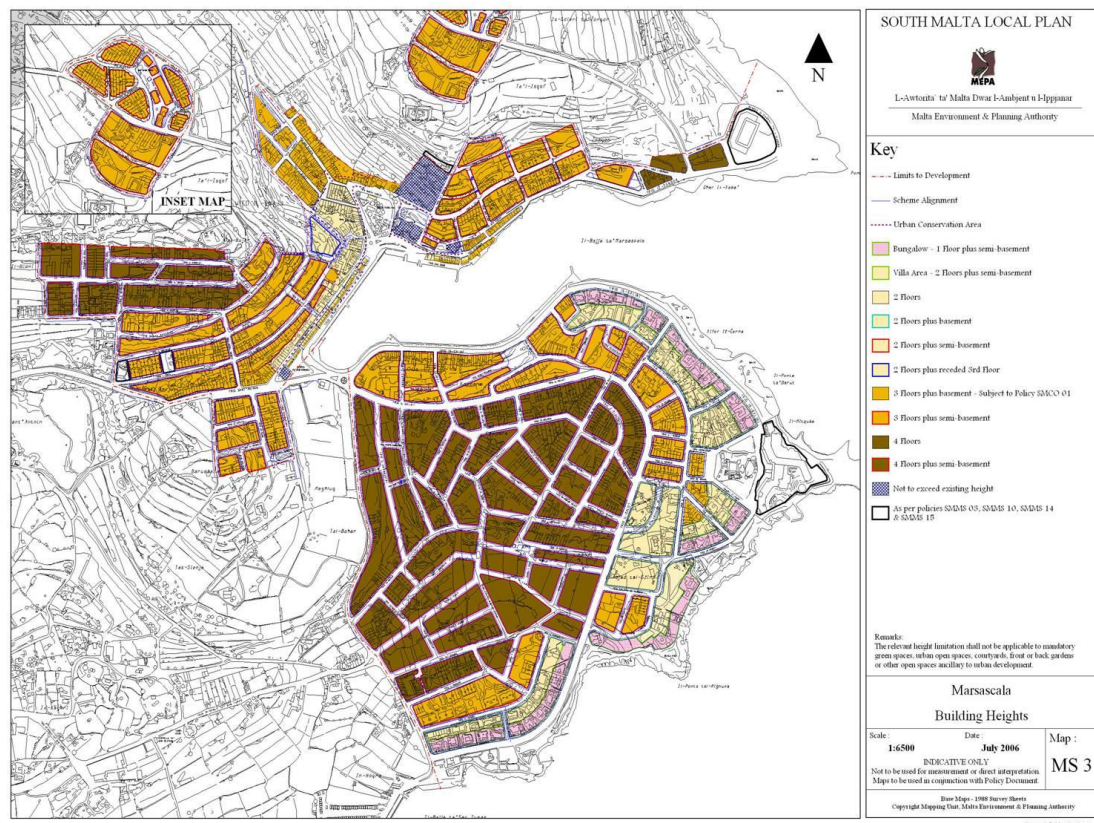


FIGURE 15: SMLP 2006, POLICY MAP MS3

3.6.1 Development Brief

The SOUTH MALTA LOCAL PLAN (2006) area policy SMMS 15, the Marsascala Policy Maps MS1 and MS2, and the Marsascala Building Heights Map MS 3, require any development proposals on the ex-Jerma Palace Hotel site to be subject to the submission of a Development Brief (PA, 2020). The site, as shown in Figure 16, is now considered as a Comprehensive Planning Area for Regeneration of the Urban Coast.

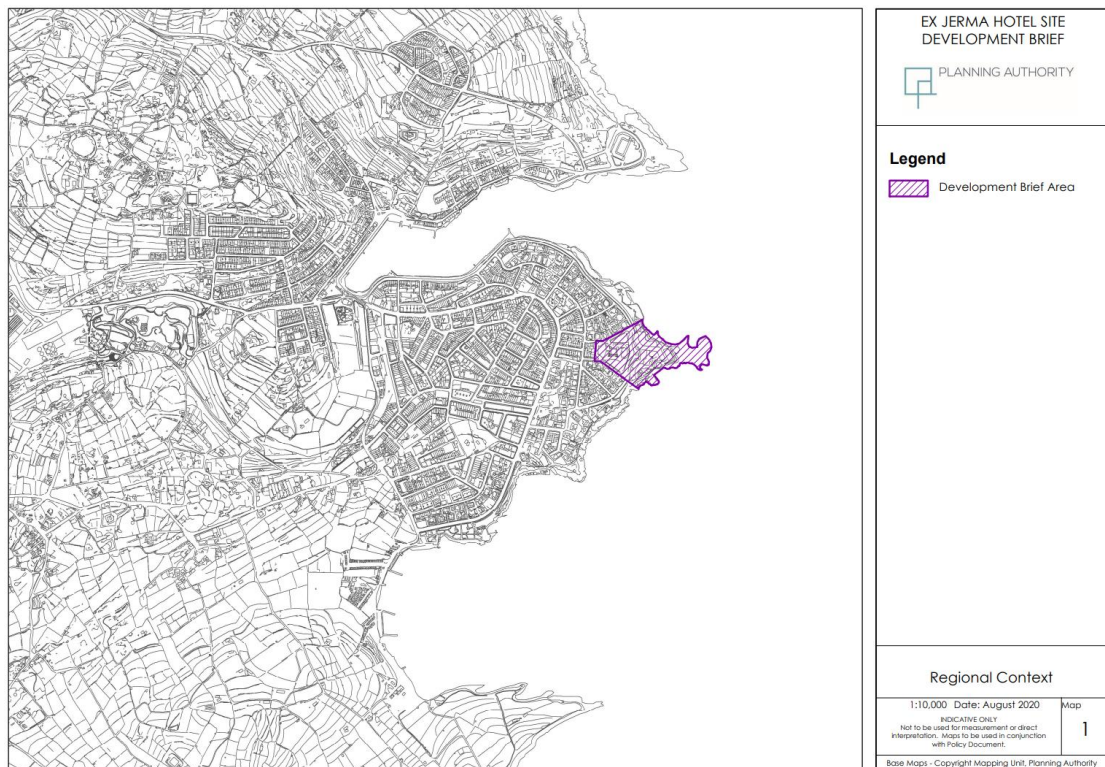


FIGURE 16: AREA SUBJECTED TO DEVELOPMENT BRIEF (PA 2020: MAP 1)

The objectives of this development brief, among others, are:

- To include an urban design framework providing guidelines on the site layout, architectural treatment, massing, colour, texture and materials of the buildings, circulation, road access, parking and landscaping requirements: Providing that a dimension for the maximum allowable building height in metres and the maximum allowable site coverage with a clear indication of how these two criteria are measured must be included (objective d);
- To ensure that public access to the foreshore is protected and enhanced (objective e);
- To introduce all the necessary mitigation measures aimed at reducing any potential adverse impact from the development, particularly on scheduled buildings and the natural coast (objective f);
- To require a planning gain contribution for the benefit of the community of Marsascala (objective g).

In order to accomplish the aforementioned objectives, the ex Jerma hotel site development brief provides a zoning map (Figure 17). The inclusion in the Development Brief area of Zone B, Zone C and Zone D pertaining to the foreshore, St Thomas Tower and the surrounding streets respectively, aids in the formulation of a comprehensive plan. According to the Planning Authority, this has enabled the consideration of continuous pedestrianised spaces and the rehabilitation of the tower through planning gain funds arising from the new development, while retaining the overall vision of the South Malta Local plan for St Thomas Tower and the foreshore. In light of this, any built development is to be restricted only to Zone A.



FIGURE 17: AREA SUBJECTED TO DEVELOPMENT BRIEF, ZONING MAP (PA 2020: MAP 4)

4 BASELINE SURVEY

The following section of the report summarises the history of the Area of Interest. Data used to compile this report consists of secondary information derived from a variety of sources, as described in Chapter 3, only some of which have been directly examined for the purposes of this Study. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

4.1 HISTORICAL IMPORTANCE OF THE AREA OF INTEREST

4.1.1 Prehistory

Nowadays, the coast of Marsascala, also known as Wied il-Ghajn, is composed by a bay sheltered to the north by Ras iz-Zonqor (Zonqor Point), which consists of low cliffs, and to the south by the headland of Ras il-Gzira (Gzira point). Further south from Ponta tal-Gzira (Gzira Point), the low cliffs carry on to il-Ponta tal-Mignuna ending in a bay called il-Bajja ta' San Tumas (St Thomas Bay).

However, Gambin (2005) demonstrates that the prehistoric landscape of Malta may have been drastically different than that of today and the environment has experienced numerous and significant changes over the millennia. In fact, archaeological indicators in Malta, including cart ruts and Garum production sites, indicate that modern sea levels are higher than those of prehistoric periods (Furlani *et al.*, 2013). Therefore, even the fertile alluvial plain of Marsascala, was probably different as it appears today, that is partially submerged by the sea forming the long narrow inlet around which the modern town was developed.

The ancient topography of the area is of pivotal importance, since the history of the Marsascala area is extremely connected with the presence of a bay that in the past offered more protection to vessels than it does today (Gambin 2004). However, due to the passage of time and the intensification of land uses in the area, it can be particularly difficult to reconstruct the coastal landscape in prehistoric times. The only pre-historical archaeological evidence in the area is represented by megalithic remains (menhir) not in a good state of conservation (site code in National Inventory: NDR1946), with no cultural material evidences that can provide further information about this long chronological period.

4.1.2 Antiquity

In Antiquity, Marsascala must have been considered an attractive area for the development of trade routes in the central part of the Mediterranean, due to the presence of two landing points for vessels (Marsascala Bay and St. Thomas Bay) and their proximity with the Marsaxlokk harbour. In fact, together, these three harbours provided safe anchorages in any wind direction to vessels with a deep draft. Furthermore, the visibility of the sanctuary complex of Tas-Silġ, built in the early third millennium BC, from the open sea and from these different embarkation points, must have represented an important landmark for seafarer, as experts have argued for

most of Greek and Phoenician sanctuaries throughout the Mediterranean (Grima & Mallia 2011: 244).

The transformation of the Mediterranean world during the classical period, must have caused a re-organization of the cultural landscape around Marsaxlokk and Marsascala. In fact, during the Republican period (II-I century BC), the complex of Tas-Silġ became a major cult centre and continued to be enlarged, while two villas were established in the area: Ta' Kaċċatura at San Girgor and the Żejtun villa. In particular, the villa in Żejtun was strategically located in an area easy to reach from St. Thomas Bay and Marsascala (Grima & Mallia 2011: 246). Therefore, the two Marsascala's harbours must have been at the centre of a dense network of agro-industrial activities, with an increase of scale, volume and intensity of shipping, especially with the increasing of bulk transportation of subsistence commodities attested in the Mediterranean during the Roman period. In fact, archaeological evidences of landscape transformation, such as agricultural field systems and stone quarries, can be found in great number in the surroundings of Żejtun (Pace *et al.* 2012).

4.1.3 Post-Classical and Medieval Period

The archaeological excavations of the Missione Archeologica Italiana in Tas-Silġ, identified the occupational phase of the site during the later Byzantine occupation between VI and IX century AC. Here, fortification works and the construction of a religious building through the re-use of stone blocks of the pre-existent sanctuary, attested the importance of the area during the post-classical period. With regard to the Marsascala area, such occupation for commercial purposes is attested by a number of underwater archaeological evidences, mainly pottery scatters (one of which found within the AoI, Feature n. 5 in Figure 22), especially amphorae (LRA1, LRA2, LRA4, di Samo, Yassi Ada type, byzantine globular shaped amphorae and fragments of north African amphorae Keay LXII type), which however cannot be interpreted as shipwrecks but as remains of activities carried out in port areas (Bruno & Cutajar 2002).

Furthermore, underwater discoveries must be linked to other archaeological remains such as structural remains (Features 7 and 10 in Figure 22) and underground rock-cut tombs and catacombs (Features 8 and 9 in Figure 22). In particular, it is worth mentioning the discovery in 1908 of the catacombs located at il-Gzira (Feature 8 in Figure 22). They consisted of a chamber of underground rooms linked by two corridors. These catacombs contain eleven tombs, one of which had a Latin inscription on the arcosolium (Zammit 1907-1908).

These archaeological remains are evidences of the presence in this area of a costal settlement. At least until the fall of Carthage (698 A.C) and the consequent Islamic conquest of North Africa, followed by a re-organization of trading routes of the central Mediterranean area.

The island of Malta and Gozo fell into the hands of the Arabs on 870 A.D. Little is known about the history of the Arab domination in Malta, even though it was a long rule running for over 200 years.

In the past, the lack of archaeological evidences about this period was seen as a proof of a rapid de-population of costal and rural areas in favour of internal villages, more protected from threats coming from the sea. However, the Islamic influence on the local population is highlighted by the Arabic toponyms, still in use. In fact, the current toponym of Marsascala derives from Arabic “Marsa”, a common word for “harbour”. Furthermore, even the toponym “Wied il-Ghajn”, meaning “Valley of the spring”, is still in use to identify the area of original settlement around which the modern town grown exponentially in the course of the 20th and 21st century.

Therefore, the pre-existent settlement must have been still inhabited during this period, probably keeping the same functions, even though with a possible change in agricultural practices, as attested in other parts of the island (Gambin 2004).

4.1.4 Early Modern

During the Late Medieval and Early Modern periods, numerous attacks were made on Malta by North African corsairs, rendering the coastline largely bereft of settlements (Freller 2010). As a result, the low-lying coastline around Marsascala and Marsaxlokk, saw a drastic increase in the investment in coastal defences, particularly by the Knights of St. John.

The Ottoman invasion of Malta in 1565 shown quite clearly how the un-protected bays of Marsaxlokk, the smaller creek at Wied il-Ghajn and St. Thomas Bay could easily accommodate the disembarkation of the Turkish armada, which went on to lay siege to the Order’s strongholds inside the Grand Harbour.

In particular, in 1614 sixty Turkish vessels under the command of Khalil Pasha landed in the unguarded St. Thomas Bay. Five thousand men raided a number of rural settlements in the south of Malta before being compelled to withdraw by the Order’s militia. Following this event, Gran Master Alof de Wignacourt and his council ordered the building of a tower similar to the ones erected at St. Pawl Bay (1609) and St. Lucian (1610) (Spiteri, 2011).

Unlike the West part of the Mediterranean, where the largest implementation of coastal fortification schemes took place in the mid-sixteenth century, in Malta this was possible only from the XVII century AD, thanks to the personal financial contribution of Grand Master Wignacourt and other Grand Masters after him who followed his example. The Wignacourt’s towers, therefore, represented a new phase in the Order’s defensive strategy that, by the end of the XVIII century, led to the fortification of the whole archipelago, transforming Malta into an island-fortress (Figure 19).

In Marsascala this new strategy led to the building of the St. Thomas tower (Feature 1 in Figure 22) in 1614. This sturdy rectangular construction was characterised by four

corner bastions elongated vertically in the form of turrets, designed to serve as a garrisoned fort (fortini) with a battery of heavy cannon on its roof, supported by two adjoining and interlinked barrel vaults and five meters thick walls. According to Stephen Spiteri, such design may have been influenced by contemporary costal towers erected in the kingdom of Two Sicilies and other Spanish colonies (Spiteri, 2011).



FIGURE 18: GRAPHIC RECONSTRUCTION OF ST. THOMAS TOWER (SOURCE: SPITERI 2011: 51)

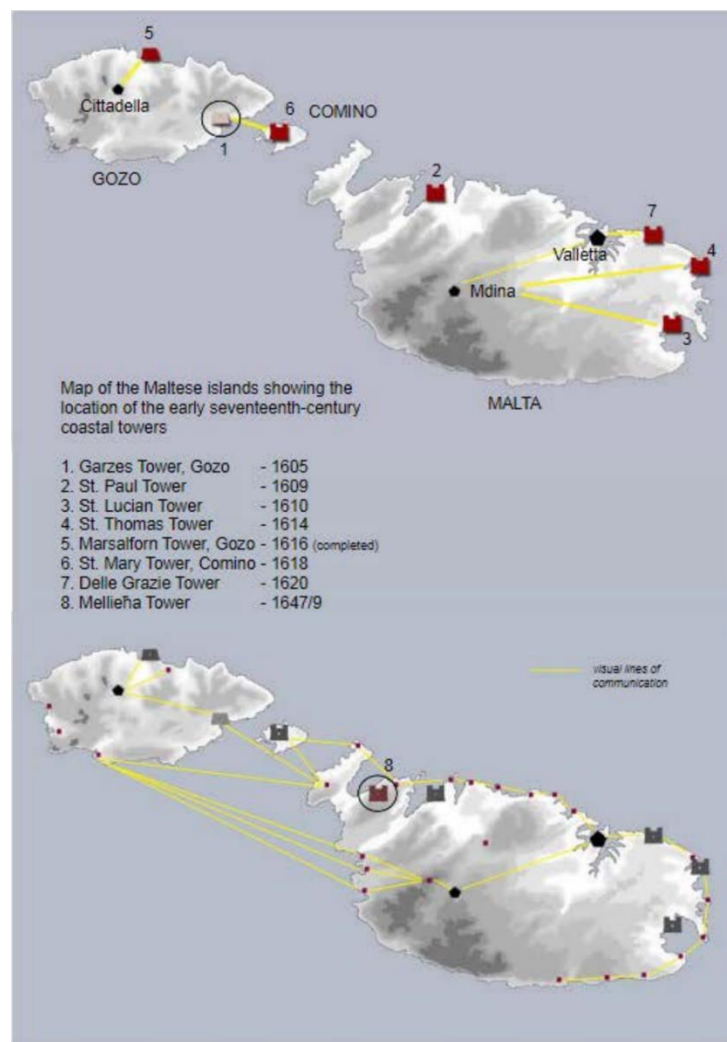


FIGURE 19: LOCATION OF EARLY XVII CENTURY COASTAL TOWERS (SOURCE: SPITERI 2013:12)

In 1714-15, the Order's military engineers added a semi-circular gun platform to the seaward side of the tower, protected by a shallow rock-hewn *fosso* (Figure 18). Whilst in 1761 French military engineers built a high parapet with embrasures and, later on, an unfinished entrenchment.

St. Thomas Tower and its battery comprised one of the heaviest armed coastal positions of the Maltese island. At that time, the tower passed from being a simple coast watch-post to a sort of command-centre (*magazzino di deposito*) for the many coastal defences in the Southern area. In times of emergency a garrison of thirty men was considered sufficient to hold defence against attack, but at other times was recommended troops to be increased to two hundred soldiers (Spiteri, 2011).

Apart from its increased military significance, the coastal area played an increasing importance in the local economy as the salt panning industry was expanded under the Knights of St. John. This included significant investment in the salt panning facilities (Feature 2 in Figure 22) by the Knights, which were in use until modern times.

4.1.5 Modern and Contemporary

During the Napoleon invasion in 1798, St Thomas Tower played a small role in the defence of Malta. Certainly, it was retained during British occupation with rooms erected on top of corner turrets possibly used as garrison accommodation or cells when the tower was used as prison (Spiteri, 2011). Nowadays the tower is in a good state of repair, as a result of extensive restoration intervention carried out in the recent years.

With regards to Marsascala Bay, today it serves as a minor port for the fishing community of the town and for recreational craft. In this settlement, there has been substantial population growth in the last two decades: from 5,419 in 2001 (National Statistics Office, 2001) to 16,804 in 2021 (National Statistics Office, 2022).

The population influx has resulted in physical expansion of the urban footprint in multiple zonal locations in the settlement (Figure 21), resulting in four zonal areas in Marsascala: Bellavista, Żonqor, Siberia and St Thomas Bay zones. It is worth noting that in this model of zonal locations in Marsascala there are missing references to the old part of the town, located on the northern side of Marsascala Bay. One reason for this is because this part of the town is relatively small and has become completely subsumed by the other areas (Seychell 2010).

This haphazard development, the evolution of which is shown in Figure 20 and Figure 21, occurred even in the AoI, with the construction of a number of civil buildings and the Jerma Palace Hotel dominating the area (see paragraph 1.4.1).



FIGURE 20: MARSASCALA URBAN DEVELOPMENT IN 1957 AND 1978 (SOURCE: PLANNING AUTHORITY 2020: 17-18)



FIGURE 21: MARSASCALA URBAN DEVELOPMENT IN 1998 AND 2018 (SOURCE: PLANNING AUTHORITY MAP SERVER)

4.2 SURVEY OF CULTURAL HERITAGE ASSETS

The locations of known cultural heritage features within and in proximity of the Area of Interest, are shown in Figure 22.

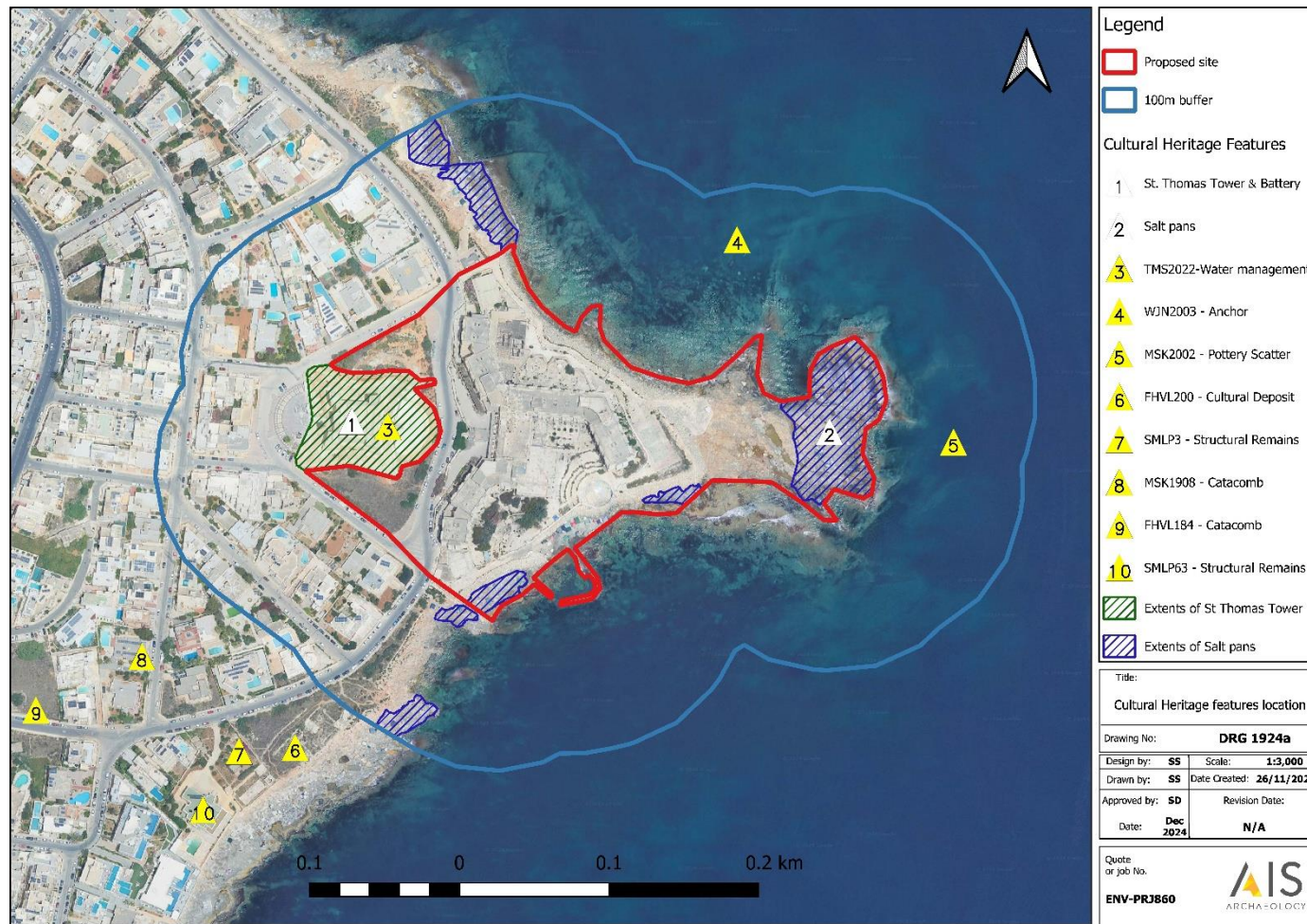


FIGURE 22: KNOWN CULTURAL HERITAGE FEATURES WITHIN AND IN PROXIMITY OF THE AoI

TABLE 2: KNOWN CULTURAL HERITAGE ASSETS

FEATURE NO.	LOCATION	CATEGORY	DESCRIPTION	ACTUAL PROTECTION
1	Dawret it-Torri, Marsascala	Architectural	St. Thomas Tower and Battery	Grade 1 – Gov. notice 729/95
2	Ras il-Gzira and surroundings, Marsascala	Archaeology	Salt Pans	Class B (Expired) – Gov. notice order 530/95 (End date 10/02/1999)

TABLE 3: KNOWN ARCHAEOLOGICAL FEATURES

FEATURE NO.	LOCATION	CATEGORY	DESCRIPTION	ACTUAL OR PROPOSED PROTECTION
3	Dawret it-Torri, Marsascala	Archaeology	Water management	Grade 1 (as part of St. Thomas Tower)
4	Underwater, Marsascala	Archaeology	Anchor	None
5	Underwater, Marsascala	Archaeology	Pottery scatter	None
6	Triq ir-Ridott, Marsascala	Archaeology	Cultural Deposit	None
7	Triq ir-Ridott, Marsascala	Archaeology	Structural remains	None
8	Triq il-Katacombi, Marsascala	Archaeology	Catacombs	None
9	Triq ir-Ridott, Marsascala	Archaeology	Catacombs	None
10	Triq ir-Ridott, Marsascala	Archaeology	Structural remains	None

Table 2 shows known tangible cultural heritage assets still present within the AoI, while Table 3 shows previously recorded archaeological features mainly no longer present within and in proximity of the AoI.

With regard to the archaeological features, a proposed protection was assigned only to feature n. 3, which is related to water management of Grade 1 St. Thomas Tower. The remaining archaeological features, which are no longer present within the AoI or were located outside the AoI, were only included to highlight the archaeological importance of the area as reference for paragraph 5.1.

It is worth mentioning that any records held by the Superintendence of Cultural Heritage on the geoportal, used in this study, are not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment. The information held within it is not complete and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.

4.2.1 Feature n.1 - St Thomas tower and battery

The historical settings of St Thomas Tower and Battery have been already tackled in paragraph 5.1. The monument represents a very important cultural assets not only for the area of Marsascala but for the whole Maltese archipelago, as part of the early modern fortification system built by the Knights Hospitaller. The monument is scheduled as a Grade 1 building (as per G.N 729 dating to 1995) and is noted to have a very high Cultural Heritage property value by the SCH in the National Inventory of the Cultural Property of the Maltese Island.

The tower and battery appear today in a good condition (Figure 23Figure 26) and the Grade 1 degree of protection assigned by relevant authorities should remain the same.

As a defensive coastal fortification, it was architecturally engineered to possess clear, unobstructed fields of fire and direct observation lines out to the open sea and adjacent coastal watchtowers to protect Marsascala and St. Thomas Bays from naval incursions. Therefore, its primary historical attributes are its clear, unobstructed lines of sight to the open sea and its visual inter-connectivity with other coastal towers.

Unfortunately, the modern urban sprawl of Marsascala have completely surrounded and engulfed the tower of St. Thomas, robbing this historical structure of its contextual legibility and important relationship with the coastline and the sea (Figure 24Figure 26).

In particular, Figure 26 shows the current state of the site, with the 25.5m high derelict former Jerma hotel blocking these views from the tower to the sea and vice versa.



FIGURE 23: ST. THOMAS TOWER, LOOKING NORTH



FIGURE 24: SAN THOMAS TOWER AND EX JERMA PALACE HOTEL, LOOKING S-EAST



FIGURE 25: SAN THOMAS TOWER AND BATTERY, LOOKING WEST



FIGURE 26: SAN THOMAS TOWER AND EX JERMA PALACE HOTEL, LOOKING EAST

4.2.2 Feature n.2 - Salt Pans

Salt Pans are located on the foreshore, mainly to the North (Figure 27Figure 28) and South of the AoI (Figure 34), while the ones within the proposed site (Figure 29) have been mainly covered/destroyed or damaged during construction of the pre-existing buildings (Figure 30Figure 33).

These are evidences of an industry that expanded during the early modern period under the Knights of St. John. The salt harvesting is a practice that has passed through generations and been preserved over several centuries and is still carried out, typically during the summer period, by Maltese families, making it both a local heritage and a tourist attraction in many parts of the Maltese archipelago.

The cultural significance of salt pans in Marsascala is attested by the Grade B protection originally given as per G.N 530 dating to 1995. However, the local plan report it as expired only three years later (1999). As a result, such salt pans within the proposed scheme appear abandoned and in poor state of conservation, mainly due to coastal erosion and construction activities.



FIGURE 27: SALT PANS IN THE NORTHERN PART OF AOI, LOOKING SOUTH



FIGURE 28: SALT PANS IN THE NORTHERN PART OF AOI, LOOKING NORTH



FIGURE 29: SALT PANS IN GZIRA POINT, LOOKING EAST



FIGURE 30: SALT PANS COVERED BY PREVIOUS DEVELOPMENT, LOOKING WEST



FIGURE 31: SALT PANS COVERED BY PREVIOUS DEVELOPMENT, LOOKING SOUTH



FIGURE 32: SALT PANS COVERED BY PREVIOUS DEVELOPMENT, LOOKING NORTH



FIGURE 33: SALT PANS COVERED BY PREVIOUS DEVELOPMENT, LOOKING NORTH



FIGURE 34: SALT PANS IN THE SOUTHERN PART OF AOI, LOOKING NORTH

4.3 CULTURAL LANDSCAPE

The photomontages from Viewpoints 1, 4 and 7, presented in the Landscape and Visual Impact technical study are shown below (Figure 35 Figure 36 Figure 37) and are discussed in the following Chapter to assess the cumulative impacts of the proposed development on the cultural landscape. Therefore, this paragraph should be read in continuation of the aforementioned study.

As per the United Nations Educational, Scientific and Cultural Organization (UNESCO) definition, Cultural landscapes are those where human interaction with natural systems has, over a long period, formed a distinctive landscape. These interactions arise from, and cause, cultural values to develop. (Operational Guidelines 2008, Annex3)

A cultural landscape may be designed at a specific time by a specific person or it may have evolved organically over a long period time (and may still be slowly evolving). It involves a grouping(s) of individual heritage features, such as structures, spaces, archaeological sites and natural elements that together form a significant type of heritage form, distinctive from that of its constituent elements or parts.

The main value of the cultural heritage in the area lies in the information it can yield regarding past settlement patterns, as well as the indications regarding land-use patterns. Crawford (1953: 51-52) explains, landscapes can be compared to a

palimpsest, that is “a document which has been written on and erased over and over again”.

In accordance with the aforementioned definitions, every archaeological feature and known cultural heritage asset included in this study should not be isolated from the geographical features which surround them.

The present landscape appears highly impacted by the former Jerma Palace Hotel and the surrounding haphazard development. However, this land still holds evidences related to the development of the landscape of the southern part of Malta.

The area of Ras il-Gzira and St. Thomas Bay contains a number of recorded archaeological remains indicative of a continuous use of the land for industrial (salt pans), domestic (structural remains) and funerary purposes (Catacombs), at least since classical period. However, most of these remains had been buried under new constructions or disappeared without a trace due to past negligence and misconduct.

At present, the St Thomas Tower and battery represent the strategic importance that such area gained with the advent of the Order of St John. An importance that was retained, albeit with an obvious downsizing given to the disappearance of threats caused by corsair attacks, until the British period (as attested by minor structural modifications of the monument).

It is therefore still possible to identify the evolution of the landscape in this small stretch of land in the South of Malta, from a probable maritime economy closely linked with agricultural production during the roman period, to a fortress economy which lost its scope with British decolonization to the development of the tourism industry (Jerma Palace Hotel).



FIGURE 35: VIEWPOINT 01 - BASELINE AND PHOTOMONTAGE OF THE SCHEME FROM ST THOMAS TOWER AREA

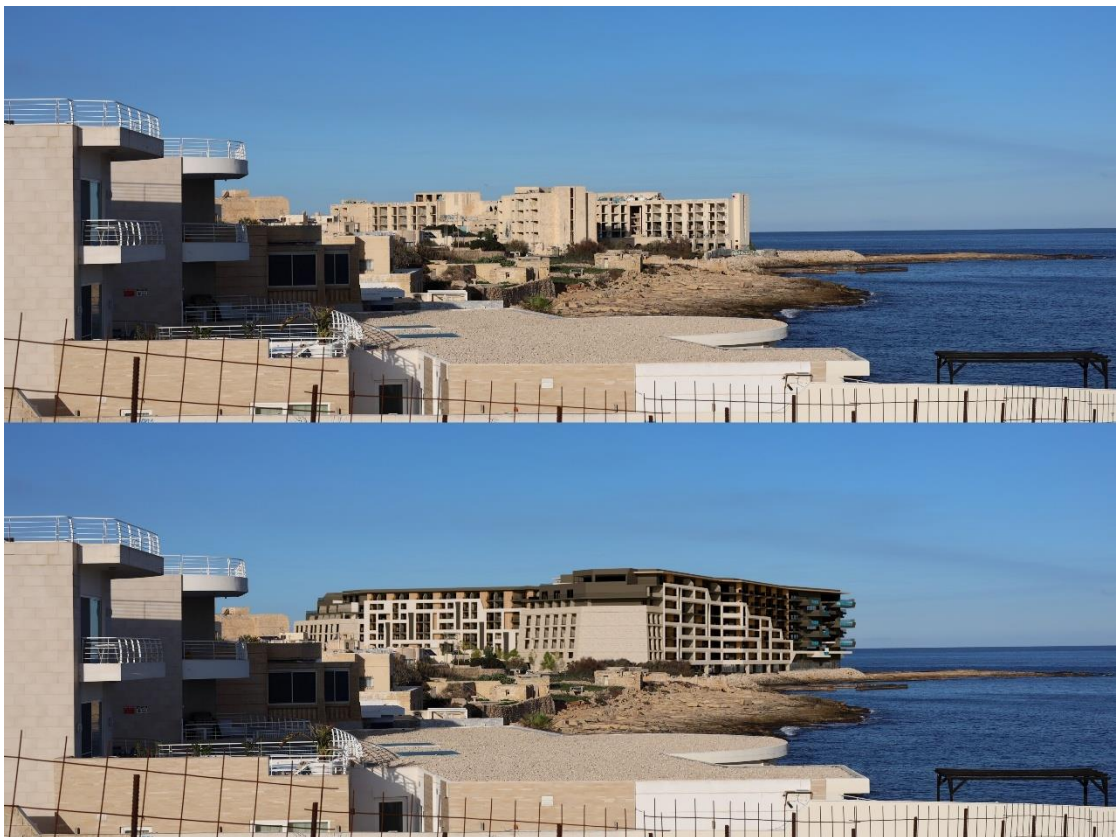


FIGURE 36: VIEWPOINT 04 - BASELINE AND PHOTOMONTAGE OF THE SCHEME FROM WWII PILLBOX



FIGURE 37: VIEWPOINT 07 - BASELINE AND PHOTOMONTAGE OF THE SCHEME FROM ZONQOR

5 IMPACT ASSESSMENT

Following the completion of the baseline survey, the Impact Assessment was conducted to determine any effects that the project may have on the identified cultural features and the surrounding cultural landscape, and therefore the steps necessary to mitigate them.

With regard to the scheme, the impact assessment takes into account the following cultural heritage assets within the 100m buffer zone (as shown in Figure 22):

- St Thomas tower and battery;
- Salt pans;
- Surrounding cultural landscape.

5.1 CONSTRUCTION PHASE

The proposed development consists of works to be carried out immediately adjacent to the eastern, northern and southern limits of the St Thomas tower and battery, currently a buffer zone composed by natural uncultivated land enclosed by modern fence on the western side of an asphalted road (Triq is-Salini).

The proposed development has the potential to give rise to direct impacts during the construction phase, particularly as a result of soil and material excavation works, as well as rock-cutting activities required for the construction of the proposed basement levels, underground garages, and landscaping interventions. Such works may result in mechanical damage to the monument and its immediate setting.

The overall significance of the impact arising from the superficial demolition of the pre-existing structures is considered to range from moderate to minor adverse, provided that the existing 50m buffer zone established for the protection of the cultural heritage assets is fully respected and that sensitive construction methodologies are adopted throughout the implementation phase.

With regard to the subsequent excavation works below the current ground surface, which is presently covered by cement and asphalt layers, it is important to acknowledge that archaeology, by its very nature, constitutes an uncertain and potentially undiscovered resource. Any archaeological remains, if present, would only become evident during the course of excavation works, at which stage appropriate preservation and/or mitigation measures could be implemented as necessary.

This assessment has identified a number of known archaeological features that were exposed during previous construction activities. Given both the quantity and significance of these archaeological remains, the potential impact associated with excavation works within the proposed scheme is considered to be moderate to major adverse.

In addition to the potential for direct physical damage, indirect impacts may also arise as a consequence of construction-related vibrations. In this regard, the western portion of the proposed development falls within the existing 50m buffer zone established to safeguard the scheduled building. Consequently, vibrations generated by the proposed rock-trimming works associated with the construction of the underground parking levels (from Level -3 to Level 0) may pose a risk of structural damage to the heritage asset. The significance of this impact is considered to range from moderate to minor adverse, depending on the final construction methodology and the effectiveness of the proposed mitigation measures.

With regard to the historic salt pans located within the wider study area, the proposed development will not encroach onto the foreshore, as the intervention is confined to the footprint of the former hotel site within Zone A (refer to Figure 17). Furthermore, the proposal includes the provision of public pathways, which are currently absent, thereby ensuring public accessibility to the salt pans located along the Ras il-Gżira headland.

Accordingly, no direct impacts on the salt pans are anticipated, with the exception of those features that have already been partially covered and/or destroyed by the pre-existing structures. Nevertheless, the proposed rock-cutting works may still result in localized minor direct impacts on those salt pans situated in close proximity to the development footprint.

5.2 OPERATIONAL PHASE

With regard to the cultural landscape surrounding the Area of Influence (AoI), it is acknowledged that the setting has already undergone substantial and largely irreversible alteration as a consequence of the construction of the former Jerma Palace Hotel together with the surrounding residential development.

Given that the existing derelict Jerma Hotel presently obstructs views between St Thomas Tower and the sea, the present assessment has considered whether the proposed scheme would exacerbate, perpetuate, or partially mitigate this existing visual impact through its proposed massing, scale, and building heights.

Reference is made to Policy UCO 6 of the 1990 Structure Plan (Conservation Policies, para. 15.11), which states that: “*The demolition of a building of no architectural or historical interest (for example, a more recently erected structure with incompatible massing, detailing or materials) will be given favorable consideration provided that it is replaced by a more compatible building immediately after demolition.*”

In view of the location and scale of the proposed development, the scheme would continue to obstruct views between the tower and the sea towards the north-west and south-west. This impact is primarily attributable to the proposed height of the development, with the North and South Blocks reaching an approximate roof level of +32m above mean sea level (AMSL). This exceeds both the height of the pre-existing hotel structure (approximately +25.5m AMSL) and that of St Thomas Tower itself (approximately +23m AMSL), as illustrated in Figures 36 and 37. The increased height

and overall massing of the proposed development are therefore likely to generate a degree of overshadowing of the tower, potentially reinforcing the visual dominance of the new built form over the historic landmark when viewed from the shoreline.

The overshadowing effect experienced from the shoreline would furthermore be accentuated by the proposed façade, its texture and color.

Notwithstanding these impacts, the scheme incorporates a number of mitigation measures intended to partially address the identified visual obstruction. These include the introduction of a central view corridor extending from the glacis of St Thomas Tower towards the foreshore, together with the creation of approximately 13,600 sqm of publicly accessible open space designed to facilitate the visual and spatial reconnection of the identified cultural heritage assets with the surrounding urban fabric.

Such interventions are consistent with the objectives of the Development Brief for the former Jerma Palace Hotel site and its surroundings (refer to paragraph 3.6.1), particularly Objective (f), which seeks to “introduce all the necessary mitigation measures aimed at reducing any potential adverse impact from the development, particularly on scheduled buildings and the natural coast.”

Furthermore, the importance of contextual setting in the perception and appreciation of scheduled buildings and monuments, as outlined in PA Circular 3/20 (refer to paragraph 3.3), appears to have been taken into consideration within the proposed design approach.

However, the proposed re-established visual relationship between the historic tower and the sea appears to remain confined primarily to the central visual axis illustrated in Figure 35. Consequently, notwithstanding that the proposed building footprints and heights are in accordance with the approved Development Brief, the magnitude of impact associated with the proposed massing and vertical scale is assessed as moderate in relation to the existing site conditions. Accordingly, the proposed development is considered to result in a moderate adverse effect on the setting of St Thomas Tower and its associated seascape context.

6 MONITORING AND MITIGATION MEASURES

6.1 CONSTRUCTION PHASE

As mentioned in the Impact assessment section, there are two known Cultural Heritage features that will be affected during construction works: St. Thomas tower and battery and the ancient salt pans.

The baseline survey undertaken as part of this assessment confirms not only the cultural heritage significance of the assets located within the Area of Interest (AoI), but also the archaeological potential of the wider site.

In view of the proposed excavation and rock-cutting works associated with the construction phase of the development, it is recommended that all such interventions be carried out under continuous archaeological monitoring, in accordance with conditions to be imposed and supervised by the competent Cultural Heritage regulator, namely the Superintendence of Cultural Heritage.

Furthermore, given the proximity of the proposed construction works, substantial ground vibrations may have an adverse effect on the scheduled buildings. Measures must be taken to address and minimize possible long-term impact to avoid structural damage and ensure building safety by preventing any possible minor cracks. Therefore, the proposed development should respect the relevant policies protecting scheduled properties to ensure that the scheduled buffer zone around San Thomas Tower and battery is subjected to the least intervention possible.

Additionally, further precautionary measures to safeguard the integrity of the existing cultural heritage assets should be taken into consideration. This study suggests proactive measures to act promptly in case of possible damage, such as daily vibration monitoring during rock-cutting works and pre and post structure survey to evaluate any possible damage.

With specific regard to the historic salt pans located within and adjacent to the proposed scheme, it is further recommended that these features be protected, insofar as practicable, through the installation of protective polythene sheeting and other appropriate safeguarding measures during rock-cutting activities.

6.2 OPERATIONAL PHASE

With regards to the surrounding cultural landscape, the proposed scheme will have a direct impact on the cultural landmark of the Grade 1 scheduled building St. Thomas Tower, which was already impacted by the former Jerma Palace Hotel.

No specific mitigation measures have been identified that would entirely offset the potential impact of the proposed development on the existing cultural landscape, which, notwithstanding the degree of anthropogenic alteration already present within the area, remains of moderate sensitivity.

Consideration should therefore be given to further design refinements aimed at reducing the magnitude of the identified visual impacts. In particular, revisions to the proposed architectural treatment, including the adoption of earth-toned globigerina limestone-textured panelling across the entirety of the external façades, would assist in reducing the visual prominence of the development within the wider coastal and heritage setting.

Furthermore, in order to reduce visual intrusion and enhance visual permeability between the sea and St Thomas Tower, consideration should be given to the introduction of a more articulated and stepped building profile towards the coastline. Such an approach would contribute to reducing the perceived bulk and vertical dominance of the proposed development, while simultaneously reinforcing the effectiveness of the proposed visual corridor between the tower and the foreshore.

The implementation of these measures would contribute towards preserving the legibility and visual appreciation of the monument within its historic setting, whilst improving the compatibility of the proposed development within the broader townscape and seascape context. This approach would also be consistent with the objectives of Policy SMMS 13 – St. Thomas Tower of the 2006 SOUTH MALTA LOCAL PLAN, which emphasises the cultural and recreational valorisation of the site and its surrounding environment.

7 SUMMARY OF IMPACTS

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT & SCALE							PROBABILITY OF IMPACT OCCURRING (INEVITABLE/ LIKELY/ UNLIKELY/ REMOTE/ UNCERTAIN)	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE	OTHER REQUIREMENTS
IMPACT TYPE	SPECIFIC INTERVENTION LEADING TO IMPACT	PROJECT PHASE (CONSTRUCTION/ OPERATION/ DECOMMISSIONING)	RECEPTOR TYPE	SENSITIVITY & RESILIENCE TOWARD IMPACT	DIRECT/ INDIRECT/ CUMULATIVE	BENEFICIAL/ ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT-/ MEDIUM-/ LONG-TERM	TEMPORARY (INDICATE DURATION) / PERMANENT	REVERSIBLE (INDICATE EASE OF REVERSIBILITY)/ IRREVERSIBLE	PROBABILITY OF IMPACT OCCURRING (INEVITABLE/ LIKELY/ UNLIKELY/ REMOTE/ UNCERTAIN)	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE	OTHER REQUIREMENTS
Potential damage of known cultural assets	Superficial demolition of pre-existing structures	Construction	Identified cultural features (St Thomas Tower and battery & Salt pans)	Sensitive	Direct	Adverse	High	Limited	Long term	Permanent	Irreversible	Likely	Moderate	Respect of Grade 1 scheduled monument buffer zone using sensitive construction methods to reduce vibration and to avoid spread of demolition material	Moderate to Minor (depending on the outcome of the proposed interventions)	N/A
Potential damage of archaeological features below the ground	Excavation works up to rock surface	Construction	Unknown potential archaeological features	Sensitive	Direct	Adverse	High	Limited	Long term	Permanent	Irreversible	Likely	Moderate to Major	Constant monitoring and use of sensitive construction methods	Moderate to Minor (depending on the outcome of the proposed interventions)	N/A
Potential structural damage of known cultural assets	Rock-cutting works	Construction	St Thomas Tower and battery	Sensitive	Indirect	Adverse	High	Limited	Long-term	Temporary	Reversible	Likely	Minor to Moderate	Use of sensitive construction methods to reduce vibration; vibration monitoring; pre and post building survey.	Minor (depending on the outcome of proposed interventions)	N/A

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT & SCALE							PROBABILITY OF IMPACT OCCURRING	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE	OTHER REQUIREMENTS
IMPACT TYPE	SPECIFIC INTERVENTION LEADING TO IMPACT	PROJECT PHASE (CONSTRUCTION/ OPERATION/ DECOMMISSIONING)	RECEPTOR TYPE	SENSITIVITY & RESILIENCE TOWARD IMPACT	DIRECT/ INDIRECT/ CUMULATIVE	BENEFICIAL/ ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT-/ MEDIUM-/ LONG-TERM	TEMPORARY (INDICATE DURATION) / PERMANENT	REVERSIBLE (INDICATE EASE OF REVERSIBILITY)/ IRREVERSIBLE	TY OF IMPACT OCCURRING (INEVITABLE/ LIKELY/ UNLIKELY / REMOTE/ UNCERTAIN)				
Potential damage of known cultural assets	Rock-cutting works	Construction	Salt Pans located in proximity of the scheme	Sensitive	Direct	Adverse	High	Limited	Long-term	Permanent	Irreversible	Likely	Minor	Use of sensitive construction methods to avoid unnecessary damage of exposed features and use of protective polythene sheeting if practicable.	Minor	N/A
Change in the context and cultural landscape	Construction of new buildings	Construction/ Operation	St Thomas tower and battery and surroundings	Sensitive	Cumulative	Adverse	High	Site and immediate surroundings	Long term	Permanent	Irreversible	Inevitable	Moderate	Use of earth-toned, globigerina limestone texture panelling for the external facade and introduction of a more articulated and stepped building profile towards the coastline.	Moderate	N/A

APPENDIX I

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