



Landscape Character & Visual
Assessment in Relation to the
Environmental Impact Assessment (EIA)
for the Proposed Redevelopment of the
Ex-Jerma Palace

As per ERA requirements for PA/00437/23

Report



LANDSCAPE CHARACTER & VISUAL ASSESSMENT

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1 INTRODUCTION

This report describes the landscape character & visual amenity impacts arising from the redevelopment and operation of the ex-Jerma Palace hotel in Marsascala, hence forth referred to as 'the Scheme'. It involves the demolition the existing dilapidated building, excavation the site to accommodate two subterranean levels and construction a new complex comprising of a new hotel, serviced apartments, commercial/retail outlets and a mixture of ancillary facilities.

This technical study identifies the existing landscape character & visual amenity 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 in relation to PA/00437/23.

1.1 PROJECT OVERVIEW

The proposed facility incorporates the demolition of the ex-Jerma Palace Hotel, the excavation of the site and construction of a mixed-use resort.

The Jerma Palace Hotel started its operations in 1982 which ended abruptly in 2007 after the ownership of a Libyan Foreign Investment Company ended. The Hotel consisted of 345 rooms and was originally run by Corinthia Hotels International. Since 2008, the abandoned hotel has been vandalised, greatly damaged, littered and is currently considered an eyesore at Marsaskala's coastline.

The Scheme is being proposed to add recreational and economic value to the area. The entire footprint of the site is 44,812m², but only around 17,570m² will be developed. The remainder of the site comprises of a coastal zone with natural bare rock, salt pans, derelict buildings, disturbed land and public streets.



FIGURE 1: SITE BOUNDARY OF THE PROPOSED EX-JERMA PALACE REDEVELOPMENT SITE

2 TERMS OF REFERENCE

The Terms of Reference related to the study on landscape character and visual amenity for the EIA were issued by the ERA in May 2024.

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

3 METHODOLOGY

3.1 AREA OF INFLUENCE

The zone of theoretical visual influence (ZTVI) within a range of 3.0 km from the Scheme was identified using Arc GIS Software as indicated in Figure 2. The ZTVI was based on the highest structure on site of +32m above MSL. The software illustrates a theoretical area where a human receiver (sensitive receptor) would be able to see the highest point of the proposed development. The basemap used incorporates a Digital Terrain Model for the Islands with a 1m resolution, thus taking into consideration all topographical features, excluding trees, buildings and other forms of visual intrusions.

The receptors found along the chosen viewpoints are:

- Residents who can view the Scheme from their homes or residences
- People walking in the streets, roads which have views of the Scheme or parts thereof
- Passengers and drivers in vehicles on the roads who would have views of the Scheme

A total of ten viewpoints were selected, including both short and long-distance views; the locations are shown in Figure 2. Each photograph was taken at a height of 1.5m above ground level and with a horizontal angular field of view of 39.60. The photographs for all viewpoints were taken on the 18th December 2024 between 14:00hrs and 15:00hrs. Each viewpoint has been analysed to assess the characteristics of each view, and the key visual elements that make up the sites visual character.

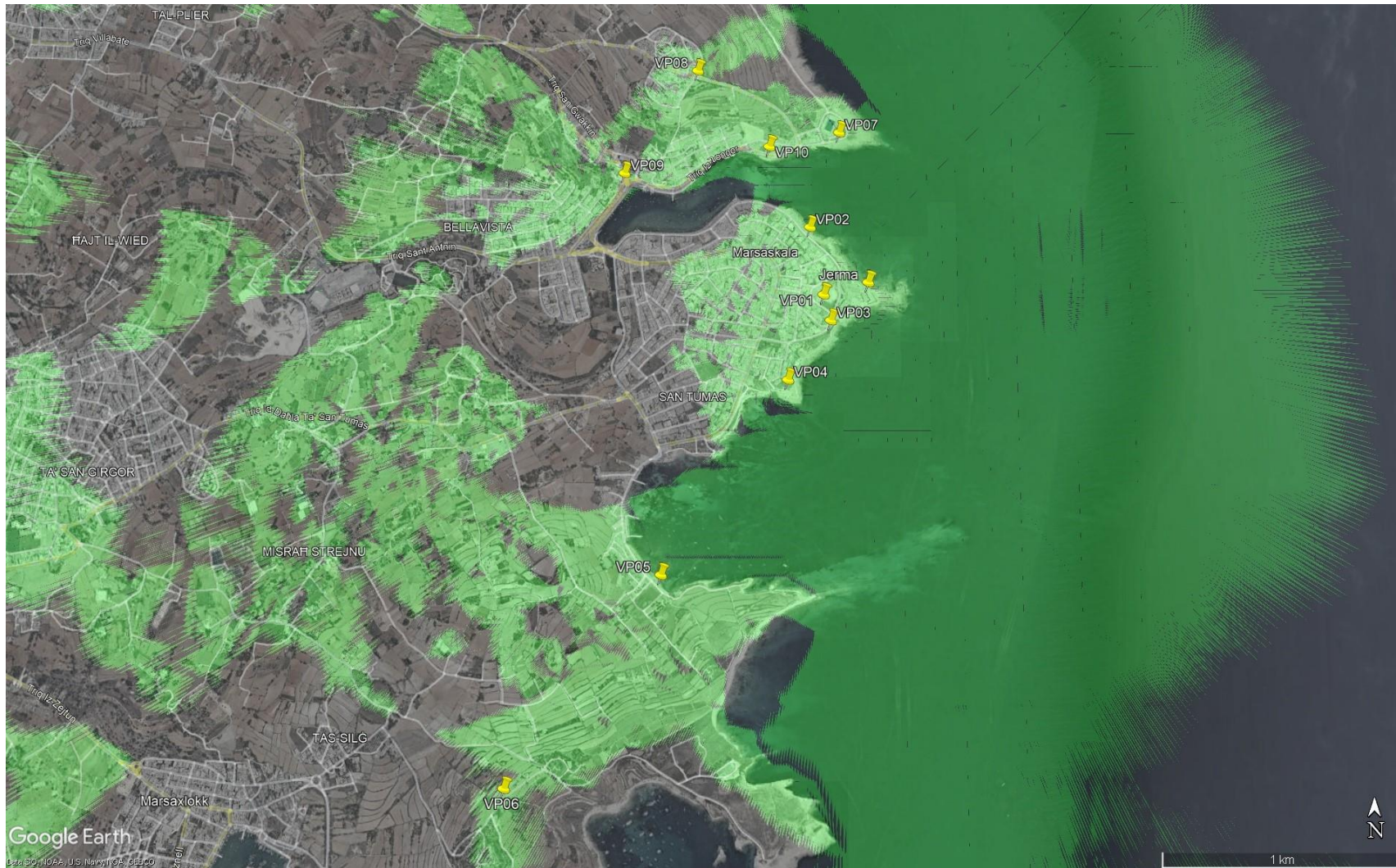


FIGURE 2: VIEWSHED ANALYSIS (IN GREEN) SHOWING THE SELECTED VIEWPOINT LOCATIONS

The ten baseline photos were taken from the viewpoints listed below. The viewpoints were chosen based on their proximity to the site and the sensitivity of the nearby receptors.

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

3.2 ASSESSMENT METHODOLOGY

The comprehensive field survey followed the VISUALISATION OF PROPOSED DEVELOPMENTS: BEST PRACTICE GUIDE (Planning Authority, 2026) and the GUIDELINES FOR LANDSCAPE AND VISUAL IMPACT ASSESSMENT (The Landscape Institute and IEMA, 2013). The survey provided a delineation of visual amenity in the AoI and served to confirm the identification of potential sensitive receptors in accordance with the Guidelines. The assessment focused on how the surroundings of such sensitive receptors may be *“affected by changes in the content and character of views as a result of the change or loss of existing elements of the landscape and/or introduction of new elements”* (Landscape Institute and IEMA, 2013)

The baseline photos were taken according to the ERA Terms of Reference and the aforementioned guidelines. The expert compiled photomontages of how the proposed development will look from each of the viewpoints. The assessment of the visual impacts was based on these photomontages. The selection of the viewpoints ensured that the Scheme would be clearly visible.

Following a thorough desktop study and field survey, the expert formulated a detailed description of the site's landscape character and each viewpoint's visual amenity. Subsequent analysis involved the identification of the number of receptors and their sensitivity to the Scheme at each viewpoint.

The desk study incorporated a review of the following literature:

- A review of the features present within satellite images (aerial photographs) of the area to analyse land use trends;
- Reference to land use maps presented in the PDS and EIA;
- Research on previous environmental and planning studies undertaken in the area, historic maps and legislation and policy documents;

The analysis involved:

- A review of the LANDSCAPE ASSESSMENT STUDY OF MALTESE ISLANDS report, the CENTRAL MALTA LOCAL PLAN (CMLP), and the STRATEGIC PLAN FOR ENVIRONMENT AND DEVELOPMENT (SPED),
- Identification of the key landscape elements in the area.
- Conducting a field survey and taking photos from selected viewpoints.
- Identification of sensitive receptors, such as physical landscape elements directly affected by development.
- Assessment of the condition and value of the existing landscape.

3.3 COMPILATION OF PHOTOMONTAGES

The baseline photographs at each of the ten viewpoints formed the base for the photomontages. The following method was adopted:

- A 3D model of the proposed development was created with 3D software (3D Studios Max). The model was created from scaled plans and drawings submitted by the project architects.
- Materials and lighting were applied to the model to obtain photo realistic renders of the model
- Virtual cameras were set up on the 3D software to replicate the same field of view and lens properties as recorded when the original baseline photos were taken
- The virtual cameras were positioned in place, relative to the object, using coordinates in world space equivalent to the coordinates taken on site. Camera angles and heights were also set accordingly.
- After rendering the model, a 2D image of the model was created to replicate the position of the scheme with respect to the location of the baseline viewpoints.
- The image of the 3D model was imported into a 2D photo editor and layered on top of the baseline viewpoint photo.
- Alpha channels were used to replace the background of the object with the photo of the site
- The model was positioned in the photo using reference geographical points. Hidden parts of the structure were erased to fit the object in the environment of the photo
- Additional effects and colour correction were used to blend the object with the photo.

3.4 IMPACT SIGNIFICANCE CRITERIA

For each potential impact, the following information has been provided:

- Description of impact
- Policy importance of impact (Local, National, International)
- Extent of effect
- Duration of impact (temporary/permanent)
- Adverse or beneficial impact
- Reversible/irreversible impact

- Sensitivity of receptors
- Probability of impact occurring (certain/likely/uncertain/unlikely/remote); and
- Scope for mitigation/enhancement (very good/good/none)

Based on the above criteria, a summary of the significance of the impact was judged in terms of whether the impact is considered not significant, of minor significance, or of major significance:

- **Not significant:** the proposed development is not expected to give rise to any effects on the existing landscape and visual amenity of the area within the AoI.
- **Minor adverse:** the Scheme is envisaged to have an adverse impact on the landscape and visual amenity and the relevant receptors in the AoI. The degree of impact is minimal in scale and is not likely to cause any complaints.
- **Moderate adverse:** the Scheme is envisaged to adversely impact the landscape and visual amenity of the area and the relevant receptors in the AoI. The degree of impact is noticeable but not excessive, thus potentially inducing some complaints. Some work is required to improve the proposal and integrate it within the proposed development.
- **Major adverse:** the Scheme will severely affect the landscape and visual amenity of the area and the relevant receptors in the AoI. The degree of impact is significant and excessive, with severe disturbances to visual amenity being predicted. Major planning and works are required to reinvigorate the visual amenity of the area.
- **Minor beneficial:** the Scheme is envisaged to partially improve the landscape and visual amenity of the area within the AoI to a minimal extent.
- **Moderate beneficial:** the Scheme is envisaged to positively improve the landscape and visual amenity of the area within the AoI when compared to the current scenario.
- **Major beneficial:** the Scheme is envisaged to considerably improve the landscape and visual amenity of the area within the AoI, such that all sensitive receptors would be able to notice the improvements from the current scenario.

This assessment considers the proposed development in its entirety, thus including construction phases, operational phases and all ancillary operations. The assessment of the significance of the impact of the proposed development is also justified in detail.

The Visual Amenity Impact Assessment also takes into consideration any committed development within the Area of Influence or Viewshed that is likely to cause residual effects on the quality of the visual amenity of the Application Site (without and with the proposed development).

The impacts on the quality of the visual amenity of the proposed site as viewed from the approved viewpoint and an assessment of the effects of such changes on the previously identified sensitive receptors of the visual amenity are incorporated within

the report. The predicted magnitude of the effects on the sensitive receptors is also justified. The sensitivity of the visual receptors depends primarily on the location and context of the viewpoint, the strategic relevance and importance of the view and the expectations of the receptor based on the activities being carried out in the area.

The report describes any mitigation measures envisaged to prevent, minimise and where possible offset any significant adverse effects on the environment of the project. The assessment also includes a list and quantification of any residual impacts expected following the implementation of the mitigation measures. The compilation of a feasible monitoring programme has also been included, for the pre-, during and post-construction phases, including frequency of the proposed monitoring.

4 BASELINE DATA

4.1 LANDSCAPE CHARACTER

4.1.1 LANDSCAPE ASSESSMENT OF THE MALTESE ISLANDS (2004)

According to the STRUCTURE PLAN of the Maltese islands, Landscape is defined as the “*visual aesthetic component of the surrounding environment – that is, the views as appreciated and interpreted through the sense of sight*”. The Landscape Assessment Study of the Maltese islands divides the islands into 61 landscape character units. Each unit encompasses a number of characteristic features that are confined to a particular tract or region of land. The landscape units falling within the areas of influence of the Scheme are listed and described in Table 1.

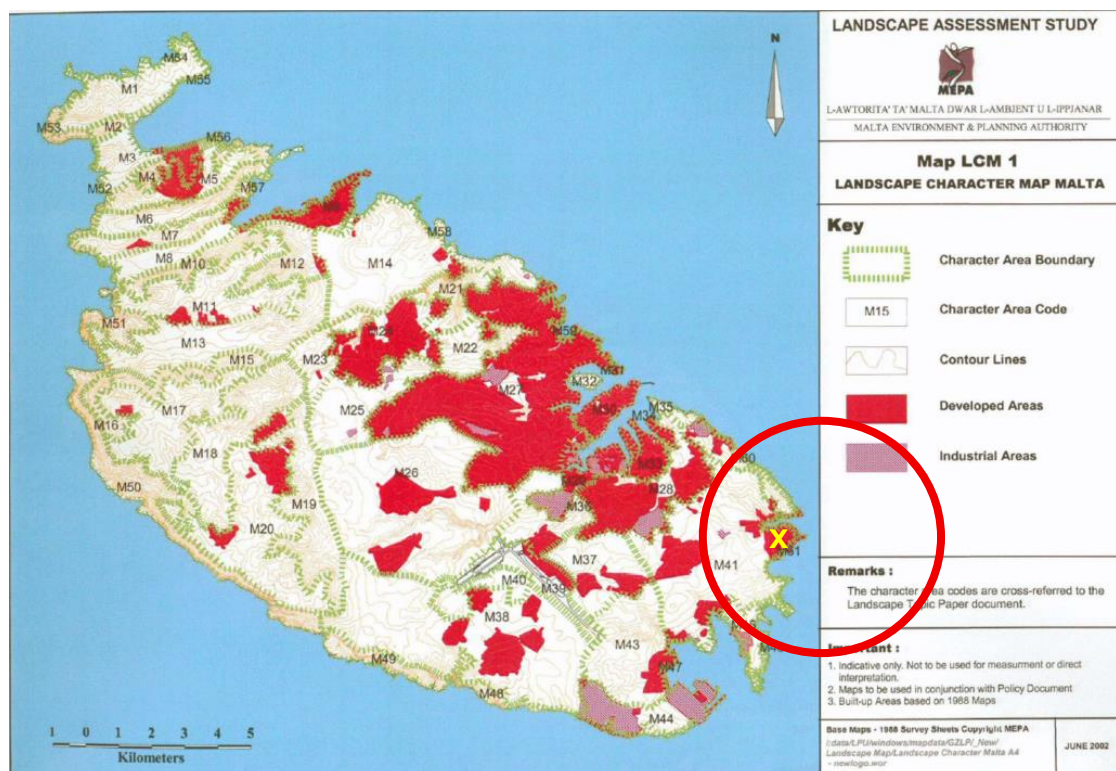


FIGURE 3: LANDSCAPE CHARACTER AREAS, APPROXIMATE SITE LOCATION MARKED BY YELLOW X AND APPROXIMATE 3KM STUDY AREA INDICATED BY RED CIRCLE (SOURCE: MEPA, 2004)¹

¹ MEPA (2004). Landscape Assessment of the Maltese Islands. Review of the Structure Plan for the Maltese Islands.

TABLE 1: LANDSCAPE UNITS

SITE	GENERAL FEATURES	ENHANCING FEATURES	DETRACTING FEATURES
M41 / M61 Zejtun – Marsaskala Hinterland	This region is composed of gentle hills with intersecting shallow valleys. The two sizeable towns of Zejtun and Marsaskala are found in this area, along with several small hamlets. A number of notable roads, for example Tal-Barrani, cut through the region. Outside of the towns, the area is predominately agricultural hosting farms, warehouses and small industries, as is typical in the Maltese rural environment. There are 3 large visual distinct facilities: a hard stone quarry, sewage treatment plant and waste recycling plant. The coastline is indented with two bays: Marsaskala Creek and St Thomas Bay. The rest of the coast is rocky with some distinctive wave cut platforms.	Visual attractive built features in the area are the parish churches, old town cores, along with several scattered historic chapels and buildings. The natural coastline is also visually spectacular with a variety of distinct features ranging from Marsaskala Creek with its picturesque promenade, traditional salt pans near il-Gzira, Ic-Cirku (a natural cultivated subsidence structure), white cliffs of Munxar Point and the blue clear sea.	Modern developments on the outskirts of the towns are engulfing and detracting away from the visual appeal of the traditional buildings. The remaining traditional boathouses in Thomas Bay are falling into a state of disrepair creating a visual eyesore along the coastline. Similarly, abandoned small rural structures blot the landscape outside of the towns. The rural landscape is also degraded by the presences of the small structures which are still in use. The Sant Antnin sewage and solid waste treatment plant is a significant visually detracting feature in the area. The surrounding vicinity is further degraded by the presence of an operational quarry.
M42 / M60	This region comprises of a coastal strip of abandoned and dry agricultural land, extending from	Historic features are the main visual attractions in the area, most notably batteries and forts, the largest of	The coastal area is considered to be in very poor condition with high rates of littering and building abandonment.

SITE	GENERAL FEATURES	ENHANCING FEATURES	DETRACTING FEATURES
Xghajra Escarpment	Rikasoli to Zonqor. The coastal border is defined by rocky coastline. The main settlement in the area is Xghajra, as well as farms, forts and batteries, an industrial estate and filming sets.	which is Rinella battery. While the coastal location provides long distance sea views of Valletta and Sliema.	The poor visual appeal of the coastline is further added to by the presence of a sewage outfall pipe. Further inland, the Rikasoli industrial estate creates a large eyesore in the area. It has developed overtime in a haphazard manner with no/little planning. Furthermore, many of the buildings are of poor quality and lack adequate maintenance. The depression within the estate itself has turned into a waste accumulation area over the years. The estate entrance is flanked by two large redundant towers. Due to the filming activities in the area, the coastline around the Mediterranean Film facility is often scattered with film props, ancillary facilities and even litter which detracts away from the overall visual amenity.

4.1.2 SOUTH MALTA LOCAL PLAN (2006)

The Scheme falls under the provisions of the SOUTH MALTA LOCAL PLAN, 2006 (SMLP). The plan does not go into detail regarding Areas of High Landscape Value. However, in accordance with the maps presented on the PA map server, defined Areas of High Landscape Value are located to the south of the Scheme site, within the study area (refer to Figure 4). While the Scheme site itself does not lie within one of the defined areas, VP 4 and 6 are on the edge of such an area; and VP5 is within a defined Area of Landscape Value.



FIGURE 4: AREAS OF HIGH LANDSCAPE SENSITIVITY (AHLs) AROUND THE SCHEME SITE (RED CROSS) (SOURCE: PA MAPSERVER, 2026)

4.2 VIEWPOINT 1: TRIQ DAWRET IT-TORRI, M'SCALA

4.2.1 Visual Elements & Intrusive Features



FIGURE 5: VIEWPOINT 1 – TRIQ DAWRET IT-TORRI, M'SCALA



FIGURE 6: PANORAMIC SHOT INDICATING THE AREAS SURROUNDING AT VIEWPOINT 1

Viewpoint 1 is situated within 100 metres west of the Scheme site and affords views towards the southern corner and front elevations of the proposed development. From this location, the visual envelope encompasses the derelict ex-Jerma building, the landscaped grounds surrounding St Thomas Tower, and Triq is-Salini immediately in

front of the site. The presence of the abandoned structure marked with graffiti, road infrastructure, parked vehicles, and passing traffic, detracts from the overall visual quality of the area. In addition, the coastal peninsula is entirely obscured by this building, resulting in a skyline that is largely dominated by its mass.

Located close to St Thomas Tower, this viewpoint represents an important vantage point for both visitors and local users of the area. The surrounding context can be described as predominantly urban in character, albeit interspersed with areas of open space and landscaping.

The wider area behind the viewpoint comprises residential land use and the grounds of the historic St Thomas Tower. The majority of the residences consist of buildings spread over two storeys and have small gardens/open areas at the front providing a sense of openness before the road. The buildings appear to be kept in good condition. Pavements are present on both sides of the road, with on-street parking; both the pavements and roads appear to be in poor condition.

Overall, the current state of the landscape can be considered as very poor since it is dominated by the dilapidated ex-Jerma Palace buildings.

The key visual elements observed at this viewpoint are summarized hereunder:

1. Blue sky
2. Ex-Jerma dilapidated building
3. Trees & vegetation
4. Railing
5. Gardeners
6. Road infrastructure
7. Parked & traversing vehicles
8. Cables & lighting poles

Noise from passing vehicles, the occasional birds chirping and voices of people visiting the area comprise the main non-visual elements at Viewpoint 1.

4.2.2 Sensitive Receptors

This viewpoint is regularly experienced by a moderate number of receptors, including nearby residents and individuals moving along Marsascala's coastal routes. The area is also visited by tourists, particularly those accessing the nearby St Thomas Tower.

4.3 VIEWPOINT 2: TRIQ IS-SALINI, M'SCALA

4.3.1 Visual Elements & Intrusive Features



FIGURE 7: VIEWPOINT 2 – TRIQ IS-SALINI, M'SCALA



FIGURE 8: PANORAMIC SHOT OF THE SURROUNDINGS AT VIEWPOINT 2

Viewpoint 2 provides a partial side view from the north-west of the proposed Scheme and is located along Triq is-Salini, a key arterial route connecting the central areas of Marsascala to the Scheme site. The foreground is defined by a wide carriageway and

adjoining promenade, both of which are heavily used by pedestrians, residents, and tourists on a daily basis. Parked vehicles, together with a line of mature trees along the promenade, structure the streetscape and the visual elements within this view. To the right, a row of low-rise bungalows with open sea views is visible. These buildings are generally well-proportioned, architecturally refined, and constructed using traditional Maltese stone, contributing positively to the character of the area.

In the background, the derelict ex-Jerma building forms a prominent visual feature, partially obstructing views of the horizon. Its deteriorated condition, along with visible graffiti, detracts from the overall visual amenity and weakens the quality of the surrounding environment.

The surrounding area is characteristic of an urban section of the Maltese coastline. A wide, flat promenade runs parallel to the shoreline, alongside a meandering coastal road, with residential properties situated on the inland side of the road. The residential properties are predominately large one-story villas, with extensive surrounding gardens.

The overall visual quality of VP2 is considered to be good. The area maintains a strong sense of openness and spatial clarity, supported by the wide street profile, coastal setting, and predominantly low-rise urban form.

The key visual elements observed at this viewpoint are summarized hereunder:

1. Blue sky
2. Ex-Jerma dilapidated building
3. Low rise buildings
4. Road infrastructure
5. Parked vehicles
6. Promenade
7. Lighting poles & traffic signs
8. Trees & vegetation

Non-visual elements at viewpoint 2 are comprised of vehicles travelling along the coastal road, people enjoying the coastal promenade, the waves breaking on the shore and engines of any nearby vessels.

4.3.2 Sensitive Receptors

This viewpoint is experienced by a large volume of sensitive receptors, particularly visitors and residents traversing along the promenade or driving along Triq is-Salini to access the residential areas.

4.4 VIEWPOINT 3: TRIQ IR-RIDOTT, M'SCALA

4.4.1 Visual Elements & Intrusive Features



FIGURE 9: VIEWPOINT 3 – TRIQ IR-RIDOTT, M'SCALA



FIGURE 10: PANORAMIC SHOTS OF THE SURROUNDINGS AT VIEWPOINT 3

Viewpoint 3 is located to the south-west of the Scheme site along Triq ir-Ridott and offers a more extensive and direct view of the existing derelict ex-Jerma building,

which strongly dominates the visual composition from this vantage point. The foreground and mid-ground include various urban elements such as pedestrian walkways, street lighting, overhead cables, and parked vehicles. A number of trees and low shrubs are also present, forming a visual buffer between the road and the adjacent coastal area on the right-hand side.

The wider setting is comparable to that of VP2, with a coastal pavement following the coastline and low-level residential development located inland. In addition, a small natural green area is present between the coastal pavement and rocky foreshore, adding another appealing visual element to the area.

Overall visual quality at VP3 is considered poor. This is largely due to the dominant presence of the ex-Jerma structure, whose deteriorated condition significantly detracts from the surrounding environment. The building's decaying fabric, visible structural damage, graffiti, and lack of proper finishes contribute to a degraded and visually incoherent setting, reducing the overall aesthetic quality of the viewpoint.

The key visual elements observed at this location are summarized hereunder:

1. Blue sky
2. Ex-Jerma dilapidate building
3. Low rise buildings
4. Street lighting & cables
5. Road infrastructure
6. Parked vehicles
7. Vegetation and trees
8. Bus stop

The non-visual elements at viewpoint 3 are the same as viewpoint 2. The non-visual elements are composed of vehicles travelling along the coastal road, people enjoying coastal walks, the waves breaking on the shore and vessel engines of boats in the nearby vicinity.

4.4.2 Sensitive Receptors

This viewpoint is mostly frequented by locals who live in the nearby neighbourhoods. These receptors may undertake frequent leisure walks or recreational activities in the area.

4.5 VIEWPOINT 4: COAST OFF TRIQ IS-SIKKA, M'SCALA

4.5.1 Visual Elements & Intrusive Features



FIGURE 11: VIEWPOINT 4 – COAST OFF TRIQ IS-SIKKA, M'SCALA



FIGURE 12: PANORAMIC SHOTS OF THE SURROUNDINGS AT VIEW POINT 4

Located around 400m south-west of VP03 and the Scheme site, this viewpoint provides longer-range views towards the proposed development. The foreground is primarily defined by residential properties and adjacent coastal areas, establishing a transitional zone between the built environment and the shoreline. Ongoing works in the foreground, evidenced by the presence of steel wire mesh, introduce a degree of visual clutter and detract from the overall amenity of the scene. At the same time, the expansive open sea to the right contributes a strong sense of openness and visual relief.

Beyond the immediate foreground, the coastal edge gradually transitions into the ex-Jerma development site and the peninsula that defines the natural footprint of the area. However, the derelict ex-Jerma building remains a dominant and intrusive feature, obstructing views towards the horizon and diminishing the overall quality of the outlook.

The area on the coastal side of VP4 is comprised of yellow coloured, weathered limestone, typical of Maltese exposed foreshores. Safety handrails and an information sign have been installed to protect the general public navigating through the area. A small rural building is on the tip of the foreshore. The sea views beyond are open and unobstructed. The inward area of the viewpoint is occupied by densely packed modern apartment blocks with no visual conformity and an undeveloped plot.

From a landscape perspective, the overall visual condition of this viewpoint can be assessed as moderate. While the long-distance views and coastal setting introduce elements of openness and spatial depth, the presence of intrusive foreground elements and the deteriorated structure in the background reduce the overall visual coherence and quality of the scene.

The key visual elements observed at this viewpoint are summarized hereunder:

1. Blue sky
2. Blue sea
3. Low-rise dwellings
4. Coastal areas
5. Construction works
6. Trees and vegetation
7. Ex-Jerma dilapidated building

The main non-visual features observed at this viewpoint are limited to people walking in the area, the waves breaking on the shore and passing or anchored vessels off the coast.

4.5.2 Sensitive Receptors

This viewpoint experiences a moderate level of pedestrian activity, primarily associated with individuals accessing the nearby coastal areas for recreational purposes, including swimming and seasonal outdoor gatherings. The location is therefore used intermittently but regularly, particularly during warmer periods.

4.6 VIEWPOINT 5: MUNXAR HILL, M'SCALA

4.6.1 Visual Elements & Intrusive Features



FIGURE 13: VIEWPOINT 5 – MUNXAR HILL, M'SCALA



FIGURE 14: PANORAMIC SHOTS SHOWING THE SURROUNDINGS AT VIEWPOINT 5

This viewpoint, situated approximately 1.5 km to the south-west of the Scheme site, is defined by a transitional landscape that reflects both the urban edge and the coastal fringe of the locality. The immediate setting is strongly influenced by a combination

of rocky and sandy shoreline, which attracts a high number of visitors, particularly during the summer months. As such, this vantage point affords wide, uninterrupted views across St Thomas Bay, including the surrounding coastal cliffs that frame the bay.

To the left, the extent of the locality's horizontal spread and ongoing vertical development is clearly visible, with several tower cranes punctuating the skyline and signaling continued urban growth. In contrast, the ex-Jerma building appears in the background as one of the first built elements intersecting the horizon. Due to the considerable viewing distance, its deteriorated condition is not readily apparent from this location.

The wider area is characteristic of an undeveloped stretch of the Maltese coastline. The shoreline retains its natural character and attracts recreational users, particularly during the summer months for swimming and sunbathing. Further inland, an open area is utilised for the informal parking and storage of boats.

From a landscape perspective, the overall visual quality of this viewpoint is considered good. The dominance of natural coastal features, combined with the openness of the seascape, contributes to a visually appealing and balanced composition, offering a strong sense of place and scenic value.

The key visual elements observed at this viewpoint are summarized hereunder:

1. Blue sky
2. Blue sea
3. Beach
4. Residential buildings
5. Tower cranes
6. Cliffs
7. Trees & shrubs
8. Ex-Jerma building
9. Buoys

The main non-visual element is the noise from people enjoying the outdoor coastal environment for informal recreational activities, both on land and in the marine area. By the nature of such activities, the noise is highly seasonal. The waves breaking on the shore, also generates noise, especially during adverse sea and weather conditions.

4.6.2 Sensitive Receptors

This viewpoint experiences seasonal activity, with movement largely limited to recreational swimmers, pedestrians and hikers traversing the nearby Munxar Hill.

4.7 VIEWPOINT 6: TRIQ XROBB L-GHAGIN, DELIMARA

4.7.1 Visual Elements & Intrusive Features



FIGURE 15: VIEWPOINT 6 – TRIQ XROBB L-GHAGIN, DELIMARA



FIGURE 16: PANORAMIC SHOT OF THE SURROUNDINGS AT VIEWPOINT 6

This viewpoint is situated approximately 2.5 km to the south-west of the Scheme site and offers wide-ranging views across a varied landscape. The scene is dominated by terraced agricultural fields in the Delimara area, extending towards St Thomas Bay and the more densely developed urban fabric of Marsascala. The ex-Jerma development is visible on the right-hand side, occupying a prominent position along the peninsula. To the left, additional residential development can be observed on the elevated terrain of Iz-Zonqor, further contributing to the layered composition of the view. Scattered trees and shrubs across the landscape provide visual relief and help soften transitions between different land uses.

Given the considerable distance from the Scheme site, the deteriorated condition of the ex-Jerma building is not readily discernible. However, its overall massing and scale remain noticeable, making it a visually prominent feature within the wider landscape.

The wider area is typical Maltese countryside characterized by traditional rubble walls and individual plots of agricultural land. The land appears to be under active cultivation. The rural roads are narrow with no street markings or formal parking, however they do appear to be in reasonable condition.

The overall visual quality of this viewpoint is considered good. The combination of expansive views, natural elements, and a clear distinction between rural and urban land uses contributes to a well-balanced and visually engaging setting.

The key visual elements observed at this location are summarized hereunder:

1. Blue sky
2. Blue sea
3. Road infrastructure
4. Entire townscapes
5. Low-lying buildings
6. Agricultural fields
7. Rubble walls
8. Trees & vegetation
9. Cables & street lighting poles
10. Ex-Jerma building
11. Tower cranes
12. Cliffs & coastal areas

Passing vehicles on the rural road network and farmers working the fields make up the main non-visual elements of the viewpoint. Occasional chirping birds are also audible at this viewpoint.

4.7.2 Sensitive Receptors

Human activity within this location is relatively limited, with only occasional use by local residents and passing visitors. Consequently, the viewpoint is considered to have low receptor sensitivity in terms of frequency of use, while still retaining a strong rural identity within the broader landscape context.

4.8 VIEWPOINT 7: TRIQ IZ-ZONQOR, M'SCALA

4.8.1 Visual Elements & Intrusive Features



FIGURE 17: VIEWPOINT 7 – TRIQ IZ-ZONQOR, M'SCALA



FIGURE 18: PANORAMIC SHOTS OF THE SURROUNDINGS AT VIEWPOINT 7

This viewpoint is located approximately 600 m to the north of the Scheme site, in an area known as Zonqor Point. The immediate foreground is defined by a coastal

setting, characterised by a rocky shoreline that is occasionally used for swimming and informal recreation. The coastline is accompanied by a road and a pedestrian footpath, both of which provide access to the area and contribute to its accessibility.

From this vantage point, wide views are available across Marsascala Bay, including the row of low-rise bungalows along Triq is-Salini, St Thomas Tower which is partially shielded by the buildings in-front and the prominent ex-Jerma development site. While the ex-Jerma building's deteriorated condition, such as the absence of apertures and the presence of graffiti is perceptible, these details are not immediately prominent due to the viewing distance.

The wider area is composed of two contrasting land uses. On the coastal side, the foreshore has been left largely undeveloped leaving the natural weathered limestone highly visible. In contrast, to the landward side of VP7, one will find the abandoned former national swimming pool stadium with large open car parking area. A low-rise restaurant and several tightly packed apartment blocks are also present, creating the sense of a busy urban environment.

The overall visual quality of Viewpoint 7 is considered good. This is largely attributed to the presence of attractive coastal features in the foreground, which contribute positively to the overall composition and visual experience.

The key visual elements observed at this location are summarized hereunder:

1. Blue sky
2. Blue sea
3. Coastal areas
4. Trees & vegetation
5. Ex-Jerma development building
6. Traversing vessels
7. St Thomas Tower

The dominant non-visual element comprising this landscape is the vehicles travelling along the coastal road network and further inland to access residential properties. Additional background noises include people maximizing the potential of the natural coastal setting for recreational activities.

4.8.2 Sensitive Receptors

Viewpoint 7 is predominantly experienced by residents and visitors moving through the area, either on foot or by vehicle along the surrounding road network. As a result, the viewpoint is considered to have moderate to high receptor sensitivity, reflecting both the frequency of use and the presence of a varied group of receptors.

4.9 VIEWPOINT 8: TRIQ HURDS BANK, M'SCALA

4.9.1 Visual Elements & Intrusive Features



FIGURE 19: VIEWPOINT 8 – TRIQ HURDS BANK, M'SCALA



FIGURE 20: PANORAMIC SHOTS OF THE SURROUNDINGS AT VIEWPOINT 8

Located to the north-west of the Scheme site, this viewpoint affords long-distance views from the elevated Zonqor area. The foreground is defined by terraced agricultural fields interspersed with scattered trees and traditional rubble walls,

which contribute to the rural character of the setting. A tower crane is also visible on the left-hand side, indicating ongoing construction activity within the lower-lying areas of Zonqor, near Marsascala. In the mid-ground, partial views of Marsascala Bay begin to emerge, adding depth to the overall composition.

Beyond this, the view extends towards the coastal stretch along Triq is-Salini and the ex-Jerma development site situated on the peninsula. Elements such as St Thomas Tower, residential areas around Triq Dawret it-Torri, and the derelict ex-Jerma building are clearly discernible. The structure remains a prominent feature within the scene, with a continuous horizon line visible behind it, occasionally punctuated by marine activity, including passing vessels.

The surrounding area is characterized by agricultural fields and relatively low-density residential properties, as is typical for urban fringe areas. Asphalted roads with clear road markings are a key visual feature amongst the street blocks. The residential properties although all adjoined only reach a maximum height of three-stories, retaining a sense of relative space.

Overall, the visual quality is assessed as moderate to good. This reflects the combination of rural landscape features with visible infrastructure and construction activity, which slightly reduces the visual coherence of the otherwise agricultural setting.

The key visual elements observed at this location are summarized hereunder:

1. Blue sky
2. Blue sea
3. Vessel
4. Road infrastructure
5. Tower crane
6. Low-lying buildings
7. Agricultural fields
8. Rubble walls
9. Trees & vegetation
10. Ex-Jerma development site

Non-visual components of the viewpoint include vehicles of the residents accessing their homes and farmers in the agricultural fields. During certain times of the year, fertiliser odours may also be present.

4.9.2 Sensitive Receptors

Viewpoint 8 is positioned at a key junction within the Zonqor residential area and therefore experiences moderate levels of activity from both pedestrians and passing vehicles. As a result, the viewpoint is considered to have moderate receptor sensitivity, reflecting its level of use and degree of visual exposure.

4.10 VIEWPOINT 9: TRIQ SANT'ANNA, M'SCALA

4.10.1 Visual Elements & Intrusive Features



FIGURE 21: VIEWPOINT 9 – TRIQ SANT'ANNA, M'SCALA



FIGURE 22: PANORAMIC SHOT OF THE SURROUNDINGS AT VIEWPOINT 9

Located to the west of the Scheme site, this viewpoint offers a composite view of the inner core of Marsascala. The foreground is defined by a key junction, a wide and expansive promenade around Marsascala Bay, and the parish church positioned on the left-hand side. As the photograph was taken during the winter season, a number of sailing boats can also be observed within a small boatyard area adjacent to the shoreline.

In the background, a series of residential and commercial buildings line the bay, predominantly low- to medium-rise in scale. The ex-Jerma site is largely obscured from this viewpoint due to intervening development, and as a result, the proposed Scheme is not expected to be visible from this location.

The wider area is occupied by the coastal town of Marsascala and therefore, characterized by a mixture of commercial and residential properties. The buildings

and street fittings appear to be in good condition and well maintained creating a pleasant urban setting.

The overall visual quality of this viewpoint is considered moderate. This reflects the dominance of built form, urban activity, and infrastructure, which tend to overshadow the natural coastal elements and reduce the visual prominence of the bay and its surrounding landscape.

The key visual elements observed at this location are summarized hereunder:

1. Blue sky
2. Blue sea
3. Road infrastructure
4. Parked & traversing vehicles
5. Low-lying buildings
6. Trees & vegetation
7. Church
8. Vessels
9. Street lighting poles & cables

Non-visual elements are typical of a town, with ambient noise originating from traffic, commercial activities, public services and social interactions.

4.10.2 Sensitive Receptors

The viewpoint is accessed by a large number of receptors, including local residents, workers, and tourists who frequent the promenade and commercial areas within the village core. As such, it can be considered to have a relatively high level of receptor sensitivity in terms of frequency of use and exposure.

4.11 VIEWPOINT 10: TRIQ IZ-ZONQOR, M'SCALA

4.11.1 Visual Elements & Intrusive Features



FIGURE 23: VIEWPOINT 10 - TRIQ IZ-ZONQOR, M'SCALA

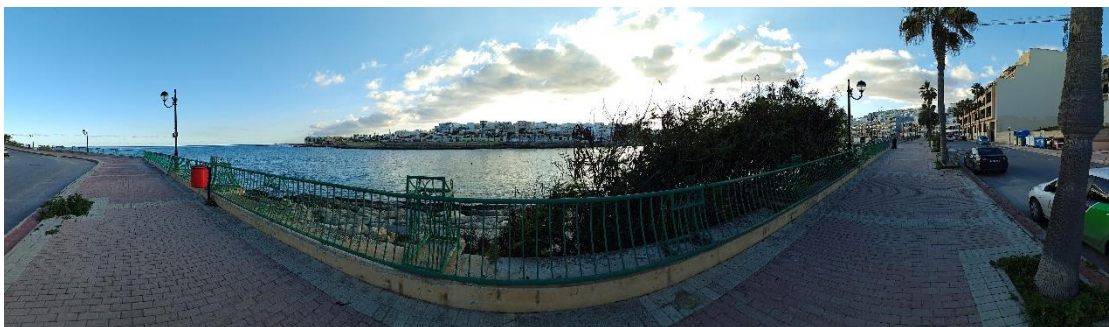


FIGURE 24: PANORAMIC SHOT OF THE SURROUNDINGS AT VIEWPOINT 10

Located approximately 300 metres further south-west of VP7, along the same stretch of road, this viewpoint affords longer-distance views towards the Scheme site. The

foreground is characterised by a well-used promenade, an adjacent coastal garigue area popular with swimmers, and open views across the bay, all of which contribute to a strong coastal setting.

In the background, the view extends towards the promenade along Triq is-Salini, lined with palm trees, as well as the low-lying bungalows, stretches of coastal garigue, the upper portions of St Thomas Tower, and the ex-Jerma development site. These elements collectively define the visual structure of the scene.

The wider area is comprised of a typical residential neighborhood, with medium-rise apartment blocks. Due to the coastal location, the seaward facing apartments all have balconies from which the residents can enjoy the sea views. A large, flat, wide promenade also provides the opportunity for walks with appealing views. A children play area is also present in the nearby vicinity.

The overall visual quality of this viewpoint is considered good. This reflects the balance between natural coastal features and the established character of Marsascala as a seaside settlement.

The key visual elements observed at this location are summarized hereunder:

1. Blue sky
2. Blue sea
3. Road infrastructure
4. Parked & traversing vehicles
5. Coastal garigue
6. Trees & vegetation
7. Low-lying buildings
8. Ex-Jerma development site
9. Vessels
10. Buoys
11. Street lighting poles

The residents accessing their properties and other vehicles travelling along the coastal road comprise the main non-visual elements of the viewpoint. Noise generated from the children's playground and other people enjoying the outdoor coastal environment also contributes to the character of the area.

4.11.2 Sensitive Receptors

Viewpoint 10 is primarily experienced by residents and visitors travelling through the area, both on foot and by vehicle along the surrounding road network. The steady flow of movement, combined with the mix of local users and visitors, contributes to a relatively high level of visual exposure. Consequently, the viewpoint is considered to exhibit moderate to high receptor sensitivity, reflecting both the frequency of use and the diversity of receptors engaging with this view.

4.12 PHOTOMONTAGES

As described in Section 3.3, photomontages were created for each of the baseline viewpoints taken within the ZTVI. The following figures present the photomontages generated from this process.



FIGURE 25: VP1 – TRIQ DAWRET IT-TORRI, M'SCALA (BASELINE)



FIGURE 26: VP1 – TRIQ DAWRET IT-TORRI, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 27: VP2 – TRIQ IS-SALINI, M'SCALA (BASELINE)



FIGURE 28: VP2 – TRIQ IS-SALINI, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 29: VP3 – TRIQ IR-RIDOTT, M'SCALA (BASELINE)



FIGURE 30: VP3 - TRIQ IR-RIDOTT, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 31: VP4 – COAST OFF TRIQ IS-SIKKA, M'SCALA (BASELINE)



FIGURE 32: VP4 – COAST OFF TRIQ IS-SIKKA, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 33: VP5 – MUNXAR HILL, M'SCALA (BASELINE)



FIGURE 34: VP5 – MUNXAR HILL, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 35: VP6 – TRIQ XROBB L-GHAGIN, DELIMARA (BASELINE)



FIGURE 36: VP6 – TRIQ XROBB L-GHAGIN, DELIMARA (WITH PROPOSED DEVELOPMENT)



FIGURE 37: VP7 – TRIQ IZ-ZONQOR, M'SCALA (BASELINE)



FIGURE 38: VP7 – TRIQ IZ-ZONQOR, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 39: VP8 – TRIQ HURDS BANK, M'SCALA (BASELINE)



FIGURE 40: VP8 – TRIQ HURDS BANK, M'SCALA (WITH PROPOSED DEVELOPMENT)



FIGURE 41: VP 09 – TRIQ SANT'ANNA, M'SCALA (BASELINE)



FIGURE 42: VP9 – TRIQ SANT'ANNA, M'SCALA (WITH PROPOSED DEVELOPMENT – NOT VISIBLE)



FIGURE 43: VP10 – TRIQ IZ-ZONQOR, M'SCALA (BASELINE)



FIGURE 44: VP 10 – TRIQ Iz-ZONQOR, M'SCALA (WITH PROPOSED DEVELOPMENT)

5 IMPACT ASSESSMENT

5.1 CONSTRUCTION PHASE

During the construction phase, the proposed Scheme is anticipated to generate discernible visual effects across short-, medium-, and long-distance viewpoints. Early-stage activities, including site clearance, demolition and excavation, will introduce temporary disruption to the existing visual environment. These works are likely to reduce visual amenity and will be accompanied by associated effects such as noise, vibration and dust generation. During drier periods, particularly in summer, dust deposition on adjacent surfaces, vegetation and residential properties may further influence the appearance of the surrounding environment, thereby intensifying perceived visual impacts.

Given the scale and complexity of the development, the use of multiple tower cranes will be required. These cranes will introduce prominent vertical elements into the skyline, forming visually dominant features during the construction period. Within the open coastal context of Marsascala Bay, such elements are likely to be widely visible and may be particularly noticeable to sensitive receptors, including residents and pedestrians moving along the coastal frontage.

Across the majority of assessed viewpoints, excluding VP6, VP8, and VP9, construction-related components such as site hoarding, scaffolding, construction vehicles, material storage areas, and active machinery are expected to be clearly visible. Collectively, these elements will result in a temporary but marked deterioration in visual quality and amenity, and are therefore assessed as giving rise to major adverse effects. The magnitude of these effects will vary depending on receptor exposure and the influence of secondary factors, including dust levels, noise, vibration and any temporary traffic management arrangements.

At viewpoints VP6 and VP8, the greater distance from the site, together with partial screening from intervening landform and built features, will reduce the prominence of construction activity. As a result, visual effects at these locations are assessed as moderate adverse. However, upper-level construction works and crane operations are still likely to remain visible.

At VP9, construction activities at ground level are expected to be fully screened from view. Only the upper sections of tower cranes may be intermittently visible, and in the context of existing urban and infrastructural elements within the landscape, the resulting visual effect is considered negligible.

Overall, while construction-phase impacts are temporary and their duration which is anticipated to extend over approximately four years, means that they will be experienced over the medium term. The application of standard environmental management and mitigation measures, including the use of screened hoarding, effective dust suppression techniques, the timely removal of redundant cranes, and wheel-washing facilities, will assist in reducing the extent and intensity of visual and environmental effects on surrounding receptors.

5.2 OPERATIONAL PHASE

The proposed development introduces an increase in overall massing and a more pronounced vertical expression, which in isolation would represent a degree of visual intensification. However, this change must be considered within the context of replacing the existing derelict and visually intrusive ex-Jerma structure. In this regard, the resulting visual outcome reflects a balance between a more prominent built form and a significant enhancement in visual quality and townscape coherence. The Scheme effectively substitutes a degraded and discordant element with a well-designed structure of higher architectural quality, leading to an overall improvement in appearance, albeit with increased scale and presence.

The development will be visible from a range of viewpoints, with the extent of visibility influenced by factors such as distance, orientation, and the presence of intervening features. Owing to its height exceeding that of the immediate surrounding context, the upper levels of the building will remain a consistent feature within the skyline. Nevertheless, the proposed design has been carefully configured to maintain appropriate height-to-width (H:W) relationships within the area. This is achieved through the retention of visual corridors, the introduction of setbacks and open spaces, and measures aimed at reducing enclosure and limiting overshadowing, particularly in close-range views.

Architecturally, the Scheme adopts a modern yet contextually responsive approach, characterised by the use of neutral tones and modern cladding materials. These have been selected to complement the textures and tonal qualities of the surrounding environment, promoting visual integration within the semi-urban coastal setting. Elements of the façade draw inspiration from the adjacent St Thomas Tower, incorporating sloped limestone features that reinterpret the language of the historic bastion walls. These features, which are particularly evident in Viewpoint 3, contribute to an improved visual composition when compared to the existing condition.

At Viewpoint 1, the impact is assessed as minor beneficial relative to the baseline scenario. The introduction of a central public plaza between the two building blocks, along with the creation of new visual connections towards the sea, enhances the spatial quality and openness of the area at close range. While there is a modest increase in height and massing, the removal of the dilapidated structure and its associated negative features results in a clear and positive transformation, yielding a development that is more coherent with its surroundings.

At VP3 and VP7, the proposed development occupies a greater horizontal and vertical extent than the existing structure, leading to an increased visual presence within these views. However, this is partially offset by the clear qualitative improvements associated with the removal of the derelict ex-Jerma building. The elimination of visually intrusive elements, such as structural decay, graffiti, and unfinished surfaces results in a more coherent and aesthetically refined townscape. As such, while the development introduces additional massing, it simultaneously

enhances the visual condition of the site, resulting in an overall minor adverse effect rather than a more significant level of impact.

At VP6, the minor adverse classification is mainly influenced by the considerable viewing distance and elevated vantage point. From this location, the increase in height and massing is less pronounced within the overall composition, and the proposed development appears as a relatively small component within a broader landscape. Furthermore, at this range, the degraded condition of the existing building is not readily perceptible, meaning that the visual benefits associated with its removal are less evident. Consequently, the assessment reflects a subtle increase in built form without a corresponding strong perceptual gain, resulting in a minor adverse effect.

At Viewpoints 2, 4, 5, 8 and 10, the impact is assessed as moderate adverse. From these locations, the increase in overall massing and the stronger vertical emphasis of the proposed development are more readily perceived, resulting in a more pronounced alteration to the existing visual baseline. In many of these views, the combination of viewing distance and partial screening reduces the legibility of the current building's deteriorated condition. As a result, the existing structure does not appear as degraded, and the visual benefits associated with its removal are less apparent. Consequently, the perceived change is driven less by improvements in architectural quality and more by the introduction of a larger and more visually assertive built form.

Key design features intended to mitigate visual impact, such as the central plaza and the spatial separation between building blocks, are not clearly discernible from these viewpoints. This limits the effectiveness of the proposed articulation in breaking down the perceived mass. As a result, the development is more likely to be read as a consolidated volume, reinforcing the perception of increased height and width within the landscape and leading to a moderate adverse level of impact.

At VP9, the proposed Scheme is fully screened from view by the intervening built form along the coastal frontage, in combination with a cluster of large vessels situated within a boatyard adjacent to the shoreline. These mid-ground elements collectively obstruct any direct line of sight towards the proposed building. As a result, the development is not perceptible from this location, and the residual visual impact is therefore assessed as negligible.

While the architectural approach of the Scheme demonstrates a clear intent to respond to the materials, textures, and formal language of the surrounding context, its overall scale and siting inevitably result in an increased level of visual exposure within the coastal landscape. As such, the extent to which the development integrates successfully will depend not only on design intent but also on the quality of execution, particularly in relation to façade articulation, the use of appropriate and durable materials, and the effective implementation and long-term maintenance of a robust landscaping strategy. Soft landscaping will be especially important in moderating the

perceived mass of the building and reinforcing its relationship with the surrounding environment at close distance views.

In addition, the increased height and massing of the proposed development will give rise to changes in shadow patterns and increased exterior lighting, particularly within adjacent public spaces and nearby residential areas. Shadowing effects are expected to be most noticeable during certain times of the day and year, when shadow casting may extend further than under existing conditions. However, given the orientation of the site, the surrounding open coastal context, and the incorporation of setbacks and open spaces within the design, such impacts are anticipated to be limited in extent.

The external lighting strategy is expected to adopt a restrained and integrated approach, with low-intensity fittings and directional luminaires used to limit light spill and avoid unnecessary illumination of the surrounding environment. Particular attention should be given to the coastal context and nearby residents, ensuring that lighting enhances safety and legibility without resulting in visual intrusion or adverse impacts on the night-time character of the area.

Overall, light and shadowing effects are assessed as minor adverse, representing a modest but manageable change to existing conditions.

6 MITIGATION MEASURES, RESIDUAL IMPACTS AND MONITORING

6.1 MITIGATION MEASURES AND RESIDUAL IMPACTS

6.1.1 Construction Phase

During the construction phase, appropriate environmental monitoring and site management measures shall be implemented to ensure that works are undertaken in accordance with the CONSTRUCTION MANAGEMENT SITE REGULATIONS (L.N. 340 of 2022). Particular attention shall be given to the installation and maintenance of appropriate site boundary screening, suppression of dust dispersion beyond the site boundary, and orderly containment of stockpiles, construction materials and machinery within designated areas. Good housekeeping practices shall be maintained throughout the construction period to minimise visual clutter and reduce the temporary visual effects associated with the works.

6.1.2 Operational Phase

The proposed development has been designed with a series of measures intended to limit its visual dominance and ensure a more sensitive integration within the surrounding townscape. Key strategies include setting portions of the building below street level, subdividing the overall volume into two distinct blocks separated by a generous pedestrian space, and maintaining an appropriate setback from St Thomas Tower to preserve its visual setting. Additional design interventions, such as the incorporation of bastion-inspired elements and the use of recessed upper floors, draw from the architectural style of the nearby tower while helping to reduce the perceived scale of the structure. Together, these approaches break down the overall massing, resulting in a more proportionate and visually coherent composition. Variations in form introduce a degree of articulation and rhythm, which further moderates the building's apparent height when viewed from street level. The use of restrained, light-absorbing materials and neutral colour tones, combined with high-quality finishes, enhances compatibility with the existing built environment.

Soft landscaping and greening form a central component of the Scheme's visual mitigation strategy. Planting at ground level, as well as across terraces, setback areas, and roof surfaces, contributes to softening the building's presence, reducing the perception of bulk, and reinforcing the semi-urban character of the locality. Green roofs and vertical planting systems not only improve visual integration but also support ecological value and microclimatic benefits, aligning with broader sustainability principles. The selection of plant species should prioritise indigenous and mature specimens, ideally sourced locally, to ensure immediate visual impact and avoid delays in achieving effective screening. It is important that the landscaping proposals illustrated in the relevant plans, reports and visualisations are fully implemented and maintained over time, both in terms of quality and extent, to safeguard their role as a key mitigation measure.

The appearance of the development during night-time conditions should also be carefully addressed. External lighting must be designed to limit unnecessary light spill, using low-intensity, well-integrated fixtures that subtly accentuate architectural features without resulting in excessive illumination. This approach will allow the

building to contribute positively to the night-time townscape, maintaining visual coherence and safety while avoiding undue visual intrusion.

Implementing such mitigation measures can lead to a partial reduction in impact significance.

6.2 RESIDUAL IMPACTS

Notwithstanding the implementation of the proposed mitigation and monitoring measures, some residual landscape and visual impacts are expected to remain. During the construction phase, residual impacts are anticipated to range from minor to moderate adverse, primarily due to the temporary presence of prominent construction elements, particularly tower cranes and other large-scale machinery and structures that cannot be fully screened from surrounding viewpoints.

During the operational phase, the most significant residual impact is associated with the building's increased height, which will remain above that of the surrounding context and introduce a noticeable, though relatively subtle, alteration to the existing skyline.

Although design measures such as setbacks, façade articulation, and the use of contextually appropriate materials will help to moderate its visual presence, the development will nonetheless introduce a more pronounced vertical element within an otherwise predominantly low-rise setting. This change will be perceptible but limited in scope, with effects that are expected to be localised and of moderate magnitude, gradually diminishing with distance from the site.

6.3 MONITORING

Monitoring is not deemed necessary in relation to landscape character and visual amenity.

7 SUMMARY OF IMPACTS

TABLE 2: SUMMARY OF EXPECTED IMPACTS OF THE PROPOSED SCHEME

Impact Type and Source			Impact Receptor		Effect and 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	Receptor Type	Sensitivity & Resilience Towards Impact	Direct/Indirect/ Cumulative	Beneficial/ Adverse	Severity	Physical/ Geographic Extent of Impact	Short / Medium/ Long Term	Temporary/ Permanent	Reversible/ Irreversible					
Reduced landscape & visual amenity during construction works at VP01, VP02, VP03, VP04, VP05, VP07, VP10	Presence of construction machinery, tower cranes; hoarding and associated works	Construction	Pedestrians, Residents, Visitors, Workers, Drivers & Passengers etc.	High	Direct	Adverse	Medium	Site and immediate surroundings	Medium	Temporary	Reversible	Certain	Major	Adhere to S.L.623.08 to minimise impacts during construction works.	Moderate	N/A
Reduced landscape & visual amenity during construction works at VPV06, VP08				High	Direct	Adverse	Medium	Site and immediate surroundings	Medium	Temporary	Reversible	Certain	Moderate		Minor	N/A
Reduced visual amenity during construction works at VP09				High	Direct	Adverse	Medium	Site and immediate surroundings	Medium	Temporary	Reversible	Certain	Negligible		Negligible	N/A
Landscape & visual amenity during operations at VP01	New proposed building	Operation		High	Direct	Beneficial	Medium	Site and immediate surroundings	Long	Permanent	Irreversible	Certain	Minor	N/A	Minor	N/A
Landscape & visual amenity during operations at VP03, VP06, VP07				High	Direct	Adverse	Medium	Site and immediate surroundings	Long	Permanent	Irreversible	Certain	Minor	The implementation of visual mitigation measures through soft landscaping at ground level, receded walls, green walls and roof gardens is essential. When possible, mature trees and vegetation should be planted to accelerate the	Minor (slight reduction)	N/A
Landscape & visual amenity during operations at VP02, VP04, VP05, VP08, VP10				Moderate	Direct	Adverse	Medium	Site and immediate surroundings	Long	Permanent	Irreversible	Certain	Moderate		Moderate (slight reduction)	N/A

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT AND 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	RECEPTOR TYPE	SENSITIVITY & RESILIENCE TOWARDS IMPACT	DIRECT/INDIRECT/ CUMULATIVE	BENEFICIAL/ ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT/ MEDIUM/ LONG TERM	TEMPORARY/ PERMANENT	REVERSIBLE/ IRREVERSIBLE					
														implementation of the mitigation measures. Maintenance of all landscaping features should remain utmost priority throughout the operational lifetime of the Scheme.		
Landscape & visual amenity during operations at VP09				Moderate	Direct	Adverse	Medium	Site and immediate surroundings	Long	Permanent	Irreversible	Certain	Negligible	N/A	Negligible	N/A
Increased shadowing effects and light pollution	Resident rooms, exterior lighting and height of proposed building	Operation	Residents & Pedestrians	Moderate	Direct	Adverse	Medium	Site and immediate surroundings	Long	Temporary	Irreversible	Likely	Minor	Strategic placement of exterior lighting to minimise glare and disturbance of sleep patterns.	Minor (slight reduction)	N/A

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.

3.2 Landscape Character and Visual Amenity

3.2.1 Landscape Character

The study should describe the landscape-related area of influence and landscape setting of the proposed site, identifying the component character areas and local landscape tracts, and the landscape elements, characteristics and degree of sensitivity thereof, so as to enable the prediction and assessment of:

- *The changes to the landscape attributable (in full or in part) to the proposed development;*
- *The implications of such changes on the quality and perception of the landscape and its elements, in each of the identified landscape character areas and local landscape tracts; and*
- *The effects of such changes on relevant receptors (the receptors should also be duly identified and their degree of sensitivity should also be indicated and justified).*

Reference should also be made to the 'Draft Landscape Assessment Study, 2004' and to the Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute & IEMA), as relevant.

3.2.2 Visual Amenity

The following need to be identified and submitted for prior ERA approval:

- The Zone of Theoretical Visibility (ZTV; also known as Zone of Visual Influence) of the site and the development under consideration; and
- Assessment viewpoints representative of short-, medium- and long-distance views towards the site. A baseline photograph taken from each proposed viewpoint is also required. The submission should cover all the important views of the site, whilst avoiding the inclusion of superfluous or inappropriate viewpoints (e.g. positions from which the site is not visible, or where the view is obstructed or dominated by physical obstacles in the foreground).

Thereafter, for each approved viewpoint, the projected situation and appearance of the site (i.e. as it would look with the proposed development in place) should be compared to the current baseline situation (i.e. without the proposed development).

The following should be predicted and assessed accordingly:

- The expected changes to visual amenity as a result of the proposed development;
- The effects of such changes on the quality of the visual amenity of the site; and
- The effects of such changes on relevant receptors. (The receptors should also be duly identified and their degree of sensitivity should also be indicated and justified).

Note: The baseline photographs and the photomontages should, unless otherwise directed by ERA, satisfy the following:

- (a) The location of each viewpoint should be shown on a map that also depicts the viewshed for the proposed site as described above. The visual angle of the photograph should also be indicated and should not be greater than 50°. Stitched photos that illustrate the field of vision towards the site from each viewpoint are acceptable as long as they are additional to the 50-degree photograph.*
- (b) The photographs and photomontages submitted should:*
 - Be at least A3 in size. Strips which are A3 in width but not in length are not appropriate except as supplementary illustrative material;*
 - Include the date and time at which the photo was taken;*
 - Be of good quality, with faithful reproduction approximating as much as reasonably possible what would normally be visible to the naked eye. The photos should be taken in good weather, and should be taken at least 2 hours after sunrise and 2 hours before sunset. Colours should not be digitally or otherwise manipulated. As a guideline, the image should have a printing density of 200 dots per inch or better. In some instances, digital images having a resolution of 1024 x 728 or better may be required for multimedia presentation purposes;*
 - Be taken in such a manner that near-field objects do not overpower or dominate features near the image plane passing through the project area;*
 - Be taken from a height above ground level that is representative of the eye level of the viewer, and such height should be duly documented; and*
 - Ensure that all additional/replacement structures and features depicted in the photomontages have a scale which proportionately tallies with the existing nearby features.*
- (c) Wherever relevant, the photomontage(s) should cover the following scenarios:*
 - The development without the proposed landscaping scheme, representing the worst-case scenario;*
 - The development complete with the proposed landscaping scheme as it is expected to look when the trees reach maturity, also providing an indicative timeframe as to when such maturity is expected to be attained; and*
 - (where relevant in relation to impact of nocturnal lighting) the development and its ancillary lighting as it would appear during night-time.*

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.