



Public Access Study in Relation to the Redevelopment of the Ex-Jerma Palace Hotel EIA

As per ERA requirements for PA/00437/23

Report



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1 SCOPE

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

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

1.1 PROJECT DESCRIPTION

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

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



FIGURE 1: SCHEME SITE, THE EX-JERMA PALACE HOTEL

2 TERMS OF REFERENCE

The Terms of Reference related to the study on public access for the EIA were issued by the ERA on 30th May 2024.

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

3 METHODOLOGY

3.1 AREA OF INFLUENCE

The Area of Influence (AOI) for the public access assessment comprises of the immediate footprint of the proposed development, together with a 100m buffer zone around the location of the proposed site.

The selected buffer encompasses the entire extent of the Scheme and any impacts it may have on the surrounding area during both the construction and operational phases.

The AOI is mapped in Figure 2.



FIGURE 2: AREA OF INFLUENCE FOR THE PUBLIC ACCESS STUDY

3.2 STUDY METHODOLOGY

The public access study was composed of two main elements: a desktop study followed by a site survey. The aim was to provide a description of the current public access arrangements in the study area and to analyse how the proposed Scheme will affect them.

The literature review included the analysis of satellite images from sources such as Landsat/Copernicus (Google Earth). The subsequent site survey was used to confirm the reliability of the data collected from the desktop research, since it is not always representative of real-time arrangements. Photographs of the current situation were taken as evidence.

Mapping of the existing routes was performed using Geographic Information Systems (GIS) software.

3.3 IMPACT SIGNIFICANCE CRITERIA

The qualitative assessment determines the potential impacts on the present public access. The potential impacts that may arise from the Scheme could enhance or compromise the current public access in the area.

The tables presented in this section (Table 1 to Table 8) provide a definition for each of the criteria used in Table 9, which summarises the assessment of impacts on public access.

TABLE 1: CRITERIA FOR THE DURATION OF THE IMPACT

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

TABLE 2: EXTENT OF IMPACT CRITERION DESCRIPTION

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

TABLE 3: CRITERIA FOR THE PROBABILITY OF THE IMPACT OCCURRING

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

TABLE 4: CRITERIA FOR THE NATURE OF THE IMPACT

EFFECT OF IMPACT	
LEVEL	DEFINITION
Adverse	Public access would suffer consequences as a direct result of the proposed development.
Beneficial	Public access would benefit as a direct result of the proposed development.

TABLE 5: CRITERIA FOR THE CONSEQUENCES OF THE IMPACT

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

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

SEVERITY, SENSITIVITY & RESILIENCE OF RECEPTORS TO THE IMPACT

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

TABLE 7: CRITERIA FOR THE REVERSIBILITY OF THE IMPACT

REVERSIBILITY OF IMPACT

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

TABLE 8: CRITERIA FOR THE IMPACT SIGNIFICANCE

IMPACT SIGNIFICANCE

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

IMPACT SIGNIFICANCE

Major Significance	The impact is of substantial and noticeable magnitude. In the case of adverse impacts, there is little or no possible mitigation that could offset the impact. A substantial change in public access.
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4 BASELINE: EXISTING PUBLIC ACCESS

The existing public access leading to the Scheme site and the surrounding Area of Influence is mapped in Figure 15.

The site is situated on a mostly undeveloped peninsula and therefore, vehicle access is limited. Triq is-Salini dissects through the Scheme site, in between the historic St Thomas Tower and the main entrance to the old hotel. It is a single lane, one-directional road with traffic flowing in a North to South orientation. Although the road is tarmacked, it is showing signs of deterioration with several cracks clearly visible on the surface. The road markings are very limited. The other roads in the surrounding area comprise of small surfaced roads; some are one-way, whilst others are two-way. The majority of the roads have demarcated parallel parking spaces on both sides.

Since the area is predominately residential, most roads have pavements on both sides. The exception, is a small stretch on Triq is-Salini which does not have pavements on both sides of the road. Due to the limited space, some of the pavements are very narrow, making them difficult to use with a pram or wheel chair. However, the concrete or block paving pavements in the area are generally in good condition.

One bus stop is located within the study area along Triq is-Salini, close to the main entrance of the abandoned hotel. It is only serviced by one bus, Route 93, which is a predominately linear route connecting Marsascala to the capital city of Valletta. It passes by the ex-Jerma Palace site on an hourly basis. The bus shelter is in very poor condition, with the glass side panels missing. Despite the good provision of pavements and a bus stop, there are no pedestrian crossings within the study area.

During the operation of the Jerma Hotel, the foreshore was inaccessible to the general public as it was considered as part of the hotel's private grounds. Two large walls were constructed along the southern and northern sides of the site to prevent public access. Once the hotel closed, access to the foreshore was left open for a number of years through the hotel grounds. However, overtime as the abandoned buildings deteriorated and became a safety risk, the access routes were blocked off using large precast blocks as a safety precaution. Some of these blocks have been removed from the southern boundary to provide an access point to the Scheme site and consequently the natural foreshore around the hotel facilities. The foreshore is mainly undeveloped, but there are a couple of small concrete paths around the perimeter of the hotel structures/facilities. Small staircases link the paths to the low-lying foreshore area; however, these are currently all blocked off by precast blocks.

The rock revetements which were constructed to protect the Jerma Palace from adverse sea conditions have deteriorated over the years. Several boulders have been

relocated during storm events. The large rocks are now scattered around the foreshore area acting as obstacles to those wishing to walk around the area.

Within the Scheme site itself there is also a small concrete road, which used to act as an internal service road during the operation of the Jerma Palace. This is currently blocked by some of the dislodged rock revetment boulders.

Just beyond the site boundary to the north and south, are two small concrete ramps which link the pavements to the foreshore. However, both ramps are in a state of disrepair. A small informal dirt footpath connects to the southern ramp, running parallel to the coastline.

Access to the marine environment in the study area is extremely limited. A single small set of steps on the seawall leads from the wall to the sea. The rest of the coast is low-lying exposed weather rock, making access to the sea cumbersome and risky.



FIGURE 3: TRIQ IS-SALINI OUTSIDE OF THE EX-JERMA PALACE HOTEL (JUNE 2026)



FIGURE 4: PAVED PAVEMENT IN GOOD CONDITIONS WITHIN THE STUDY AREA (JUNE 2026)



FIGURE 5: BUS STOP, TIRQ IS-SALINI (JUNE 2026)



FIGURE 6: FOREGROUND - POOR STATE ROCK REVETMENT; BACKGROUND - LARGE BOUNDARY WALL OF THE EX-JERMAN PALACE COMPLEX (MAY 2026)



FIGURE 7: CREATION OF ILLEGAL ACCESS POINT TO THE SITE (MAY 2026)



FIGURE 8: ACCESS FROM THE HOTEL GROUNDS TO THE FORESHORE BLOCKED BY PRECAST BLOCKS (MAY 2026)



FIGURE 9: SMALL CONCRETE PATH RUNNING ALONG THE OLD HOTEL TENNIS COURT (MAY 2026)



FIGURE 10: OBSTRUCTED STAIRCASE ACCESS (MAY 2026)



FIGURE 11: ROCK REVETMENT BOULDERS SCATTERED ON THE FORESHORE (MAY 2026)



FIGURE 12: ACCESS RAMP PROVIDING PARTIAL ACCESS TO THE FORESHORE (MAY 2026)



FIGURE 13: INFORMAL DIRT PATH IN THE SOUTHERN PART OF THE AoI (MAY 2026)



FIGURE 14: SMALL STAIRCASE LEADING DOWN THE SEA (MAY 2026)

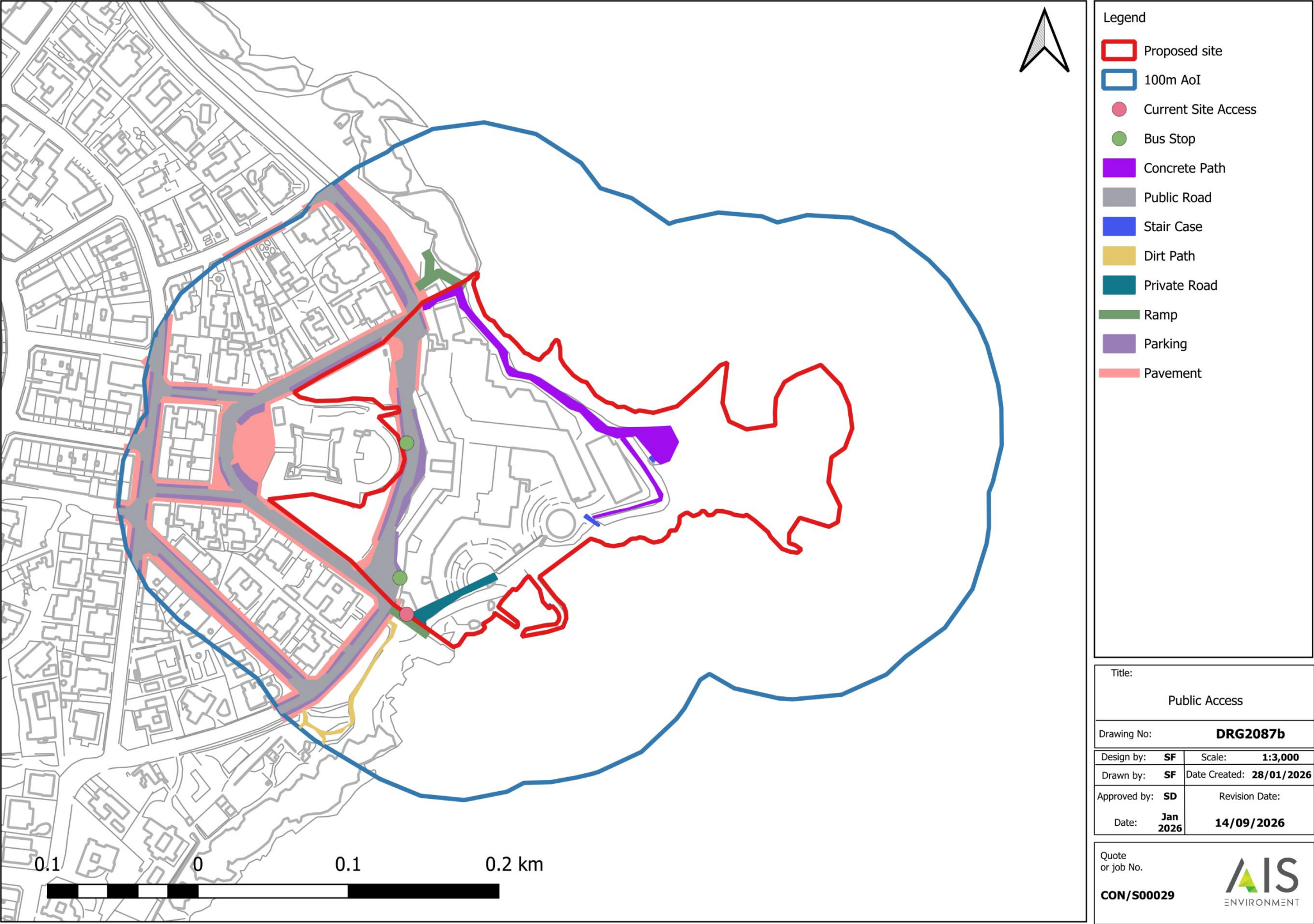


FIGURE 15: PUBLIC ACCESS FEATURES IN THE STUDY AREA

5 PROPOSED PUBLIC ACCESS

Private vehicle access to the Scheme's underground parking shall be possible from Triq is-Salini through a two-laned access ramp proposed in the north-west corner of the development (Figure 17 to Figure 19). This two lane access ramp provides segregated entry routes to the residential garages and the open visitor car parking spaces within the complex. Vehicles leaving the complex would exit back onto Triq is-Salini from a dedicated exit ramp located in the southwest corner of the Scheme. Similar to the entrance, the exit ramp is divided into two lanes, each providing an exit route from the residential garages and the visitor parking spaces.

Private coaches are to stop at the north west point of the development on Triq it-Torri and on the south west side of the development on Triq Dawret it-Torri.

The onsite parking provisions shall consist of a combination of public open spaces and private garages which are to be used exclusively for residents. Level -2 will contain 165 open spaces and 98 garages while Level -1 shall contain 165 open spaces and 93 garages. The provision of on-site parking will prevent vehicles associated with the development from parking on the surrounding narrow roads.

The central stretch of Triq is-Salini between the Scheme site and St Thomas tower is proposed as a pedestrian zone. The planned pedestrianization shall extend into the plaza between the two tower blocks and out to a viewing platform overlooking the foreshore.

Moreover, changes are to be made in current existing public transport bus-stops within the area. The current bus stop located in between St. Thomas Tower and the Scheme cannot be retained in its present location and is proposed for relocation further North along Triq is Salini (Figure 16). The proposed location would maintain convenient public transport access to the development while providing a safer and more appropriate interface between bus operations, pedestrians and other road users. The second existing bus stop located on the south-side of the site is proposed to be relocated further South along Triq is-Salini (Figure 16). This adjustment is intended to integrate the bus stop more effectively with the revised road layout and traffic circulation arrangements resulting from the proposed development and associated pedestrianization, as detailed in the Traffic Impact Assessment.

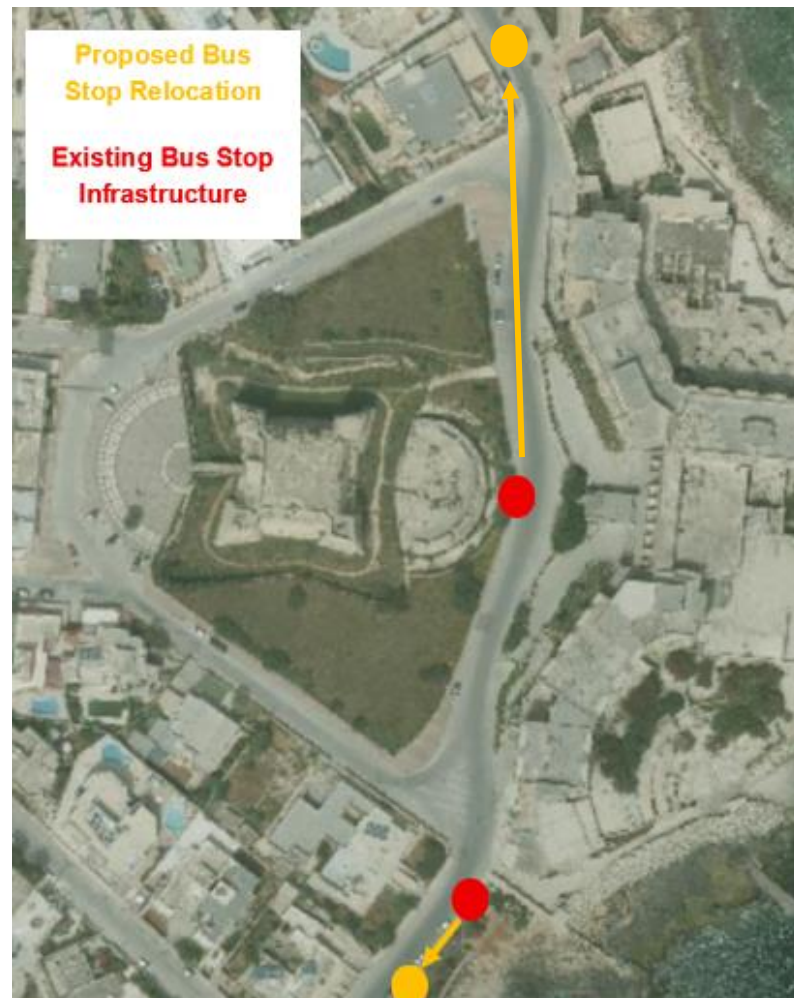


FIGURE 16: PROPOSED SHIFT IN PUBLIC TRANSPORT BUS-STOP LOCATIONS (OBTAINED FROM TRAFFIC IMPACT ASSESSMENT STUDY)

In line with the Development Brief and Local Plan guidelines, public access to the foreshore will be improved. The project involves the construction of formal footpaths to provide access to the natural foreshore area. These paths shall not extend onto the foreshore per se, leaving it in its natural state. The Contractor shall also remove/relocate all of the boulders which have been dislodged from the old revetments, clearing up the foreshore. Public access to the entire of the natural foreshore area shall be unrestricted.

The project does not involve the modifications of the existing sea wall and small quay staircase or new marine access features.

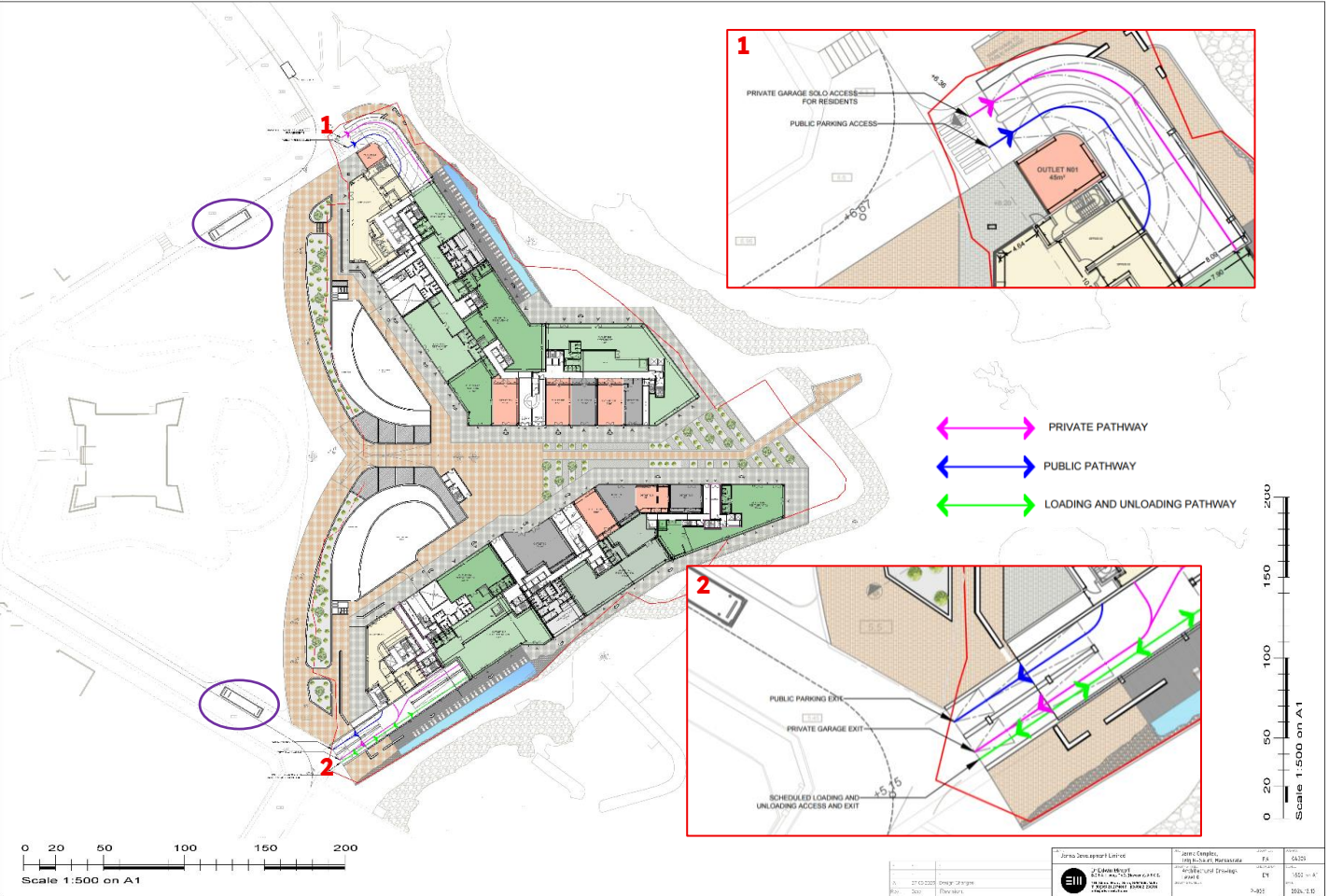


FIGURE 17: PROPOSED PROJECT LAYOUT, WITH PURPLE CIRCLES REPRESENTING ALIGHTING AREAS FOR PRIVATE COACHES, PINK ARROWS REPRESENTING PRIVATE PATHWAYS. BLUE ARROWS REPRESENTING PUBLIC PATHWAYS AND GREEN ARROWS REPRESENTING LOADING AND UNLOADING PATHWAYS. INSET IMAGES SHOWING ZOOMED IN ACCESS POINTS OF THE SITE.

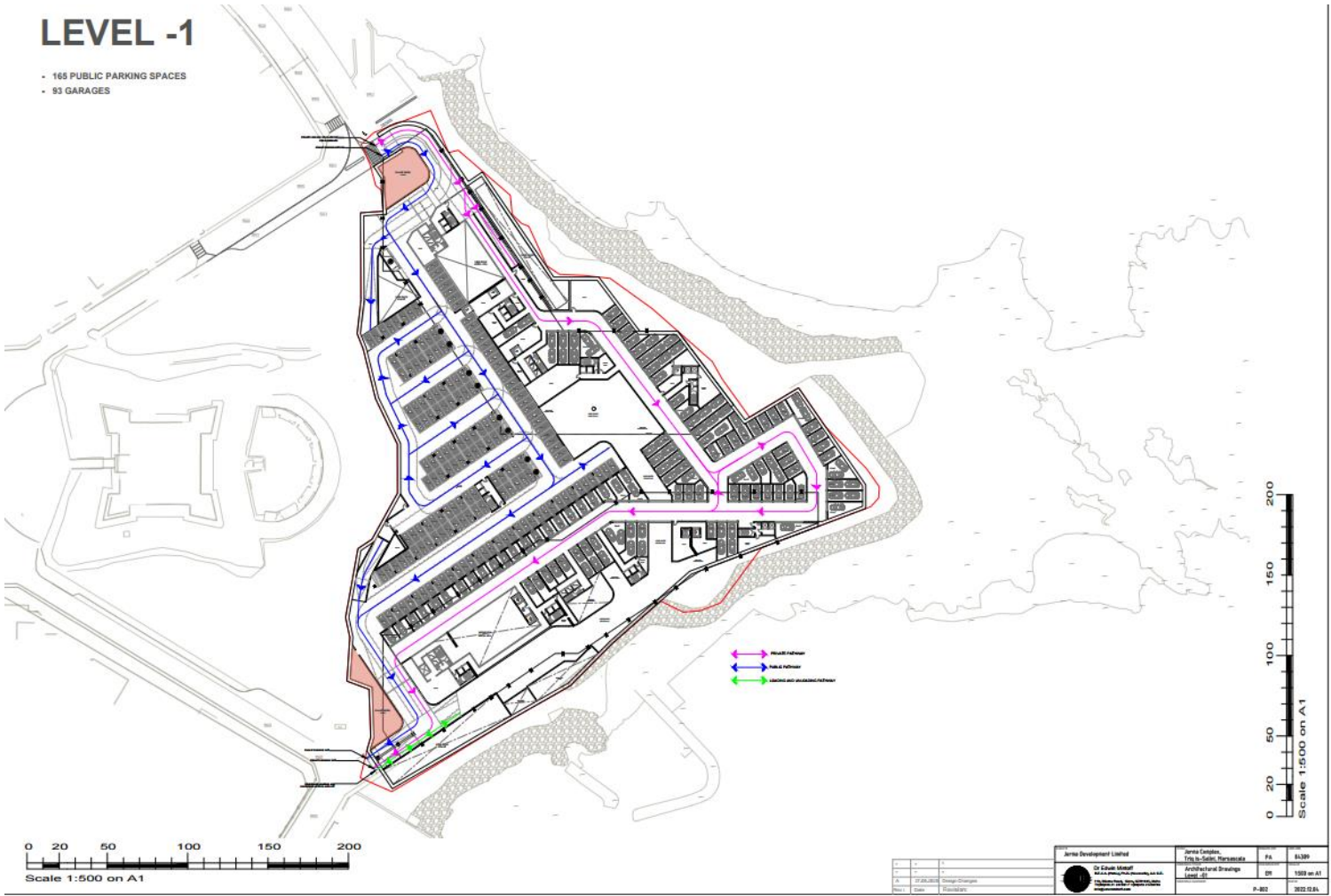


FIGURE 18: LEVEL -1 SHOWING THE CONTINUATION OF THE PRIVATE (PINK), PUBLIC PATHWAY AND LOADING (BLUE)/UNLOADING PATHWAY (GREEN)

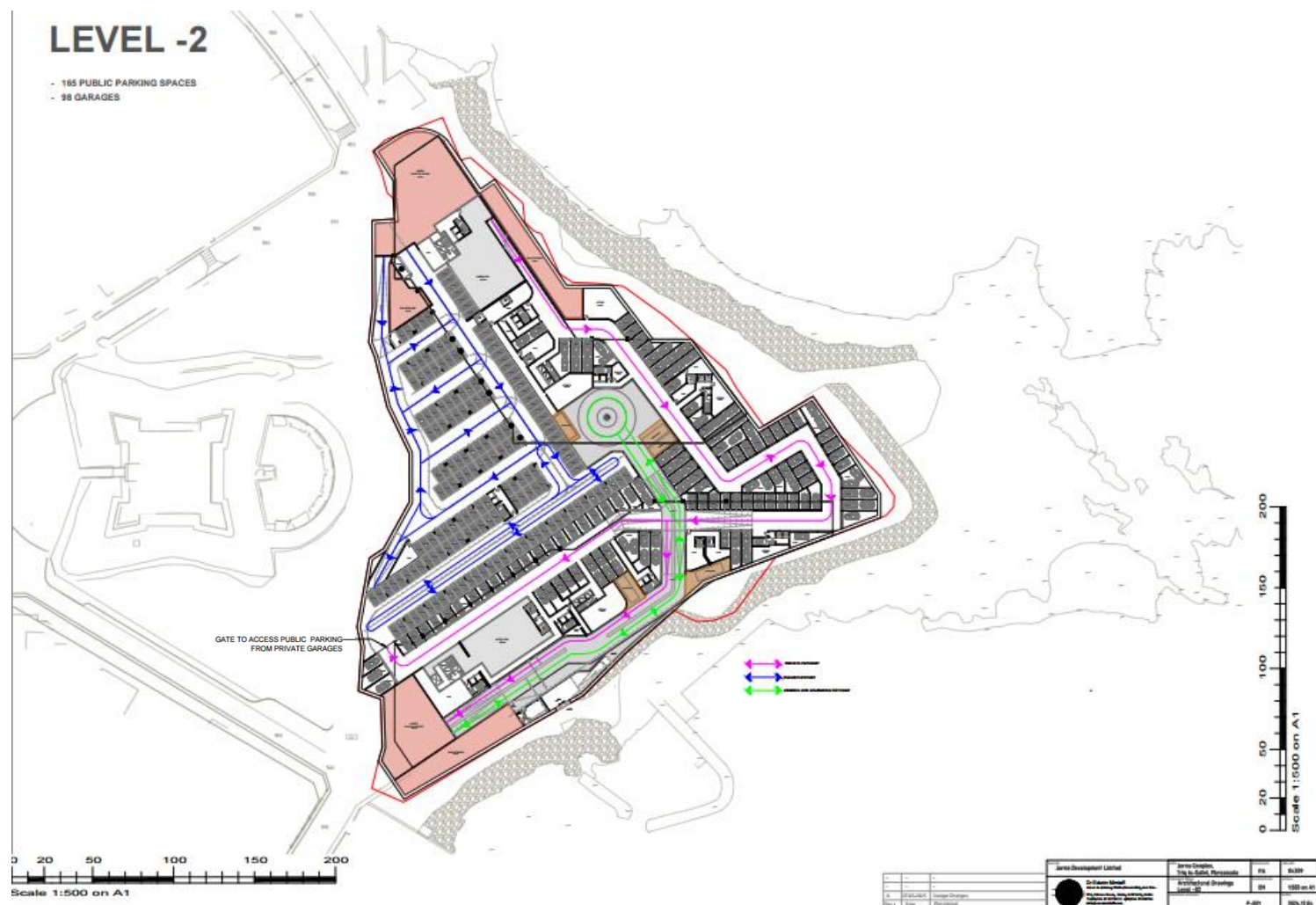


FIGURE 19: LEVEL -2 SHOWING THE CONTINUATION OF THE PRIVATE (PINK), PUBLIC PATHWAY AND LOADING (BLUE)/UNLOADING PATHWAY (GREEN).

6 IMPACT ASSESSMENT

The following subsections outline the potential impacts arising from the construction and operation of the Scheme on the existing public access. The evaluation followed the method described in the approved Method Statement.

6.1 CONSTRUCTION IMPACTS

6.1.1 Foreshore Access

Throughout the construction phase, public access to the foreshore area may be prohibited for safety reasons. Currently, the foreshore is accessible by trespassing through the ex-hotel grounds. In light of this, the potential temporary controlled access restriction during the construction phase is viewed as a negative impact of moderate significance.

6.1.2 Road Network and Pedestrian Access

Given the extensive footprint of the Scheme, all construction machinery, vehicles, equipment, material storage areas and ancillary facilities will be accommodated within the site boundary throughout the construction phase. However, as the site boundary encompasses a substantial section of Triq is-Salini, it is anticipated that public access along this coastal road will be restricted for the duration of the works.

The closure will affect both vehicular and pedestrian movements, requiring road users to divert via alternative routes, including Triq it-Torri, Triq il-Melh, Triq il-Katacombi, and Triq Likama. These roads are generally narrower in width and primarily serve the surrounding residential areas, and are therefore likely to experience increased traffic volumes and associated disturbances. Given the complete temporary closure of a key coastal route and the resulting disruption to local accessibility and circulation patterns, this impact is considered to be of moderate adverse significance.

The transportation of machinery, materials and waste to and from the site will add to the strain on the local road network. The small roads are not designed to cope with high loads of traffic or with large construction vehicles. As a result, access on the surrounding roads may be temporarily blocked due to queuing construction vehicles, or temporary bottle necks may form. The manoeuvring of vehicles into and out of the Scheme site may also cause traffic bottlenecks on the nearby junctions and public roads. The excess pressure on the local road work and associated disruptions are classified as a minor adverse due to the intermittent and temporary nature of the impact.

Furthermore, the closure of Triq is-Salini would also necessitate the relocation of the bus stop situated next to the Scheme site as well as the diversion of the bus route. The locality is serviced by another two bus stops which form part of Route 93: Olivana and Xehda (ca. 290m and 400m walk away from the Jerma bus stop respectively). Due to the presence of these two buses stops within around a 5-minute walking distance from the ex-Jerma Palace stop, the adverse impact is classified as minor.

6.2 OPERATIONAL IMPACTS

6.2.1 Foreshore Access

The provision of new footpaths, together with the relocation/removal of dislodged rock revetment boulders, will restore easy and safe access to the natural foreshore area. This is compliant with the requirements of the Development Brief document and Local Plan. This constitutes a major beneficial impact due to the improved access to the natural coastline.

6.2.2 Pedestrianisation of Triq il-Salini

The pedestrianisation of Triq is-Salini between St Thomas Tower and the Scheme site forms a key component of the proposed development. The pedestrian route will seamlessly connect with the proposed public plaza located between the two principal buildings, creating a continuous and accessible public space. Moreover, the pedestrianised paths will directly lead to coaching layby areas towards the north-west and south-west of the proposed scheme (See Section 5 Figure 17) and to the proposed public transport bus stop located further down Triq is-Salini.

The plaza will also provide direct access to a walkway leading to a viewing platform overlooking the natural foreshore. Together, these interventions will significantly enhance pedestrian connectivity, improve public accessibility and create a high-quality public realm that strengthens the visual and physical relationship between the historic tower and the surrounding marine environment.

The creation of this extensive open space is expected to enhance the recreational and cultural value of the area and is therefore considered to constitute a major beneficial impact on public access.

6.2.3 Alteration to Bus Routes

The proposed pedestrianisation of this section of Triq is-Salini will necessitate the relocation of the existing bus stops further along the road and corresponding modifications to the current bus route (See Section 5, Figure 16). While these changes may result in minor alterations to public transport accessibility and passenger movement patterns, the surrounding area is already well served by a network of nearby bus stops. Consequently, the operational impact on public transport users is expected to be limited and is considered to be of minor adverse significance.

6.2.4 Vehicle Access and Numbers

The operation of such a large development is predicted to attract significant numbers of vehicles to the area, which are currently not present within the locality. The full development is expected to generate an increase of 149 trips during the weekday AM, 263 during the weekday PM peak and 347 trips during weekend peak. This will lead to pressure and overloading of the current road junctions, as highlighted in the Development Brief document. The Brief emphasises that the increase vehicle volumes will not only affect Triq is-Salini, but also Triq il-Migbha and Triq il-Maqsab; and states

that drastic action must be taken ensure that the road network can cope with the increased vehicle volumes which would be produced by the redevelopment of the ex-Jerma Palace site.

The Development Brief recommends the diversion of vehicles away from Triq is-Salini to the neighbouring roads to protect the public space around the tower. This component has been incorporated into the project proposal and Traffic Impact Assessment study which was carried out in conjunction with this report. Given the pedestrianisation of the area in Triq is-Salini, traffic in this road will need to be diverted around the tower through the surrounding local road network, resulting in a redistribution of existing traffic flows, particularly along Triq Dawret it-Torri. Vehicles will require to alter their route as depicted in Figure 20.



FIGURE 20: PROPOSED VEHICULAR TRAFFIC ROUTING AS DUE TO THE PROPOSED PEDESTRIANISATION

Moreover, the proposed redevelopment of the ex-Jerma Palace can be accommodated within the surrounding transport network apart the junction of Triq Sant Antnin / Triq ix-Xatt / Triq il-Qaliet junction. Moreover, the study identified that the junction between Triq tal-Gardiel and Triq id-Daħla ta' San Tumas currently requires improvement in terms of road-safety and operation with the already-existing traffic scenario, especially if the proposed scheme is to be approved. Consequently, the operational impact on vehicle access and numbers is expected to be of moderate adverse significance.

7 MITIGATION MEASURES, RESIDUAL IMPACTS AND MONITORING

7.1 MITIGATION MEASURES AND RESIDUAL IMPACTS

7.1.1 Construction Phase

Foreshore Access

If possible, site hoarding on the coastal side of the site should be positioned to allow some public access to the foreshore, even if limited to a walkway. Such arrangements would need to be assessed by a health and safety professional. If feasible, this would reduce the adverse impact from moderate to minor significance.

Road Network and Pedestrian Access

The closure of Triq is-Salini is an inevitable part of the project. Therefore, the related impacts cannot be mitigated.

In contrast, the disruptions on the local roadwork in the areas surrounding the Scheme site can be mitigated by the drafting and implementation of a Construction Management Plan. The Plan should include measures such as avoidance of construction vehicles travelling during peak traffic hours, scheduling of deliveries to avoid queuing and supervised access gates to enable prompt vehicle access to and from the site. If such measures are followed, the significance of the impact can be downgraded to negligible as the queuing and disruptions on the small roads can be eliminated.

The Contractor will need to correspond with Malta Public Transport to make the necessary arrangements for the relocation of the bus stop and consequential bus route diversions. Based on the fact there are two other bus stops serving the same route close by and the assumption that appropriate arrangements can be made, the severity of the impact can be reduced to negligible.

7.1.2 Operational Phase

Green Travel Plan

The implementation of a Green Travel Plan is strongly recommended to provide an effective mechanism for reducing traffic congestion, particularly during peak travel periods, while simultaneously contributing to improved air quality, reduced greenhouse gas emissions, and enhanced accessibility. Particular emphasis should be placed on organised staff transport, public transport use, car sharing, secure cycle parking, walking and other forms of sustainable mobility as detailed in The Traffic Impact Assessment report. Monitoring of employee and visitor travel patterns following occupation of the development would also enable the effectiveness of the Green Travel Plan to be reviewed and, where necessary, strengthened.

Alteration to Bus Routes

Once again, the Developer will need to correspond with Malta Public Transport to make the necessary arrangements for the relocation of the bus stop and consequential bus route diversion. Similar to the disruptions during the construction phase, based on the fact there are two other bus stops serving the same route close by and the assumption that appropriate arrangements can be made, the severity of the impact can be reduced to negligible.

Vehicle Access and Numbers

Modifications to the surrounding road junctions are required to reduce the load/pressure on the public road network:

Triq Sant Antnin / Triq ix-Xatt / Triq il-Qaliet junction

According to the Traffic Impact Assessment it is recommended that appropriate capacity-enhancement measures are to be investigated. With particular focus on signal optimisation, revised signal staging, geometric improvements, turning-lane provision or other junction modifications, subject to detailed design and further operational assessment.

Triq tal-Gardiel and Triq id-Dahla ta' San Tumas junction

According to the Traffic Impact Assessment improvements to the operation and road-safety is required to be modified. The existing geometry, visibility conditions, proximity of on-street parking and pedestrian infrastructure warrant attention irrespective of whether the Jerma redevelopment proceeds. Accordingly, redesign of the junction should be pursued to improve maneuverability, visibility, pedestrian safety and the overall organisation of traffic movements.

Such modifications will reduce the impact intensity from moderate to negligible throughout the operational phase.

7.2 MONITORING

No monitoring of public access is being proposed in either the construction or operational phases.

8 SUMMARY OF IMPACTS

TABLE 9: SUMMARY OF IMPACTS TABLE

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT AND SCALE							PROBABILITY OF IMPACT OCCURRING	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE
IMPACT TYPE	SPECIFIC INTERVENTION LEADING TO IMPACT	PROJECT PHASE	RECEPTOR TYPE	SENSITIVITY	DIRECT/INDIRECT/CUMULATIVE	EFFECT OF IMPACT BENEFICIAL/ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT/ MEDIUM/ LONG TERM	DURATION OF IMPACT TEMPORARY/ PERMANENT	REVERSIBLE/ IRREVERSIBLE				
Restricted access to the foreshore	Obstruction along foreshore due to site hoarding	Construction	Local residents, and tourists	Medium	Direct	Adverse	Medium	Site and immediate surroundings	Short	Temporary	Reversible	Possible	Moderate	Creation of safe passageway along foreshore, close to sea (subject to health & safety risk assessment)	Minor
Restricted road and pedestrian access	Closure of Triq il-Salini	Construction	Road users and pedestrians	Low	Direct	Adverse	High	Site and surrounding locality	Short	Permanent	Irreversible	Inevitable	Moderate	N/A	Moderate
Pressure on local road network	Increase in large vehicles on small residential roads	Construction	Road users	Low	Direct	Adverse	Medium	Surrounding locality	Short	Temporary	Reversible	Possible	Minor	Implementation of a Construction Traffic Management Plan	Negligible
Change in public bus service	Relocation of bus stop	Construction	Bus users	Low	Direct	Adverse	Low	Site and surrounding locality	Short	Permanent	Irreversible	Inevitable	Minor	Coordination with Tal-Linja for alternative arrangements	Negligible
Improved access to foreshore	Restoration of foreshore and construction of access paths	Operation	Local residents, and tourists	Medium	Direct	Beneficial	High	Site and immediate surroundings	Long	Permanent	Reversible	Inevitable	Major	N/A	Major
Pedestrianised area	Pedestrianisation Triq il-Salini, plaza and viewing platform	Operation	Local residents, and tourists	Medium	Direct	Beneficial	Medium	Site and immediate surroundings	Long	Permanent	Reversible	Inevitable	Major	N/A	Major

IMPACT TYPE AND SOURCE			IMPACT RECEPTOR		EFFECT AND SCALE							PROBABILITY OF IMPACT OCCURRING	OVERALL IMPACT SIGNIFICANCE	PROPOSED MITIGATION MEASURES	RESIDUAL IMPACT SIGNIFICANCE
IMPACT TYPE	SPECIFIC INTERVENTION LEADING TO IMPACT	PROJECT PHASE	RECEPTOR TYPE	SENSITIVITY	DIRECT/INDIRECT/CUMULATIVE	EFFECT OF IMPACT BENEFICIAL/ADVERSE	SEVERITY	PHYSICAL/ GEOGRAPHIC EXTENT OF IMPACT	SHORT/ MEDIUM/ LONG TERM	DURATION OF IMPACT TEMPORARY/ PERMANENT	REVERSIBLE/ IRREVERSIBLE				
Alterations to public bus service	Relocation of bus stops and route modification	Operational	Bus users	Medium	Direct	Adverse	Low	Site and surrounding locality	Long	Permanent	Irreversible	Inevitable	Minor	Coordination with Tal-Linja for alternative arrangements	Negligible
Increase in traffic in surrounding roads	Junction capacity exceedances	Operation	Road users	Medium	Direct	Adverse	Moderate	Site and surrounding locality	Medium	Temporary	Reversible	Inevitable	Moderate	Modifications to nearby road junctions	Negligible

APPENDIX I

TERMS OF REFERENCE

The ERA issued the final Terms of Reference related to the study on public access 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.

3.10 Public Access

The assessment should identify the current public access arrangements (particularly the accessibility of the countryside, coast, and public open spaces), including existing footpaths and other public access routes, and should clearly indicate whether these would be affected and how.

Wherever any new or altered arrangements are proposed, these should be clearly identified and their environment implications should also be indicated.

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:*
 - o 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.