

PA/09407/17: Comments received by ERA during EIA scoping stage (From 03rd November 2017 to 26th November 2017)

A. Malta Resources Authority (Email dated 13th November 2017)

Comments
<p>The Authority has no comments to make on the master plan, other than to encourage the use of excavation material.</p> <p>This assessment is based primarily on the documentation that was published on the weblink provided as on the date of the assessment. The Authority made its assessment on a good faith basis and reserves the right to review its position and, or to take action against the authors of the documentation and, or the applicant if information relevant to its assessment (particularly the prior use of the site where the development is proposed) is 'buried' or concealed (including through the submission of documentation that is not text searchable).</p> <p>This, and any other response in writing by the MRA to the application submitted for consultation or to any other documentation, should not in any way be deemed as approving or endorsing the application in any form or of condoning any matter that falls beyond the MRA's immediate remit as established under the Malta Resources Authority Act and as in force on the date of the relevant response. In particular, you are reminded that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations have been excluded from the remit of Malta Resources Authority and as such the MRA has no authority to take a position on matters regulated by these regulations or indeed any other matter that does not fall within its remit. While this response may be published, any response by the MRA may not be publicly used or mentioned as a general or partial approval by the MRA of the matter referred to for consultation.</p>

B. Malta Tourism Authority (Email dated 15th November 2017)

Comments
<p>The MTA have seen the Project Description Statement with regard to the Manoel Island development and have the following comments to make with regard to the Terms of Reference for the EIS.</p> <ol style="list-style-type: none"> a) The EIS is to assess the visual impact of the proposed development particularly in terms of the building heights proposed in relation to the Valletta skyline, Fort Manoel and Marsamxetto Harbour; b) The impact of the proposed development particularly during construction stage on the Carolita dive site, particularly in view of the construction of the breakwater; c) The visual impact of the proposed additional floor on the Lazzaretto in relation to the Valletta skyline, Marsamxetto Harbour and Fort Manoel; d) The phasing of each part of the development has not been specified. The EIS should look into this aspect particularly with regard to the impact construction activity will have on the tourism related facilities at the Lazzaretto; e) Although the PDS does not give any indication of the type of hotel operation being envisaged at the Lazzaretto, the EIS is to look into the relationship between the proposed hotel operation product and the proposed development on Manoel Island and any impacts the latter will have on the former;

- f) The impact of the proposed hotel operation at Lazzaretto on the architectural fabric and value of this building, particularly with regard to modifications that may be required to the building to accommodate the type of tourism facility proposed.

C. Environmental Health Directorate (Email dated 21st November 2017)

Comments

With reference to your e-mail dated 3rd November regarding subject indicated in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development:

1. Air pollution impacts assessment
 - For dredging, demolition, excavation and construction
 - Emissions from heavy vehicles
 - Transports, storage and handling of dust laden materials
 - Particulates generated by break water
 - And their effects on the surrounding area included marine environment.

Necessary monitoring and mitigating measures must be clearly stated.

2. Noise and vibration impacts including those associated with dredging, excavation, demolition and/or construction of breakwater, quay upgrade, bridges replacement and any other proposed works. Required monitoring and mitigating measures must be clearly stated

3. Traffic Impact Assessment and mitigation measures.

4. Light pollution impact and mitigation measures.

5. Effects on water quality and mitigation measures. The effects of sediments and water quality during the construction and operational stages (especially in view of the possible transport of dredging waste by sea during construction and the increased water vehicle traffic in the operational stage) must include this area in view of the potential effect on public health.

6. Risk assessment on waste management shall be implanted which includes the impacts from waste generated both during the construction (excavated and dredged material) and operation phase. Hence the importance of detailed Construction and Waste Management Plans which should be enforced by the site project manager and which should also address waste management both during the construction and operational phases of this project. Details of monitoring and feedback mechanisms must be clearly stated and adhered to.

7. The overall cumulative impacts of the development on the general public.

8. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence.

9. Services for yachts. It is pertinent that with regards to utilities, the Marina operational regulations include details for an adequate and direct supply of potable water to be readily available at the quay for use by the vessels. A sewage system for the discharge of waste water from vessels directly into the main sewage system is also to be provided. Such services are NOT to be provided by bowers.

10. The provisions of L.N. 5 of 2006 regarding Legionella Control are to be taken into consideration in view of potable water within the whole project especially for hospitality facilities, Residents' Country Club and public sports facilities. Included the heating water system.

11. A hydrology assessment should be made available. Such assessment must included details for the supply, distribution and storage of potable water. Furthermore it must included details of collection, storage, overflow and use of rainwater and grey/black water. Details of extraction water and discharge of saline water of reverse osmosis plant and also any air cooling system that will discharge into sea water.

12. Indicated discharge point for a reservoir osmosis plant and any discharge from air cooling water system and swimming pool that will be present on site.

13. Indicate discharge of oils, lubricants and detergents used

The EIA should also include a detailed description of the measures envisaged to prevent, minimise and where possible offset any significant temporary or permanent adverse health effects and nuisances on the Area of Influence and the general public. This should include details regarding monitoring programmes that may be proposed. The EIA should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.

Applicants are also requested to carry out specific discussions with the various units within the Directorate for Environmental Health once the detailed plans for the public areas, catering establishments, food outlets and other facilities (such as cooling systems, R.O. plants, lidos, swimming pools, water features, etc.) are prepared in view of specific regulations under the Food Safety Act and the Public Health Act.

D. Żminijietna Malta (Email dated 26th November 2017)

Comments

“Original contract should be analysed for breach of contract” - Żminijietna

The Left think tank organization Żminijietna said, “that the Planning Authority should not continue with the public consultation process on the new masterplan for Manoel Island”.

“First of all, Żminijietna is highly concerned with the amount of development proposed within Manoel Island. Also there is a possibility of further development in that area, similar to what happened in Tigne, under the excuse of new planning regulations”.

Żminijietna insists, “that before any discussion on the new masterplan, an investigation should be carried out whether there was a breach of the original contract, as originally the amount of development in Tigne and Manoel Island was not to exceed 30% each”.