

Meeting	EIA Public Consultation in relation to the following proposal: PA/09407/17– EA00015/17: Development of Manoel Island comprising of a mixed-use development incorporation residential, commercial and leisure facilities which will, in part, overlie subterranean parking facilities; upgrading of the existing marina including the installation of a floating breakwater; sports facilities for the local community; public amenities; a hospitality offering and a Centre for the Arts and Culture. The proposal includes the restoration, adaptive re-use and inclusion of the cultural heritage buildings and identified archaeological sites which will form an integral part of the development. The proposal also includes the development of large public open spaces, comprising predominantly softscapes and landscaped open area, piazzas, streets, promenades and the regeneration of the glacis park around Fort Manoel. These public open spaces will make up a large proportion of the project’s footprint. The proposal also contemplates the development of a new bridge from Triq ix-Xatt onto Manoel Island and the dredging and widening of the channel between Manoel Island and the Gzira mainland to aide sea water circulation and seacraft access around the island. The development incorporates the restoration and re-use of part of the existing bridge to become a belvedere point. Site at, Manoel Island, Gzira, Malta
Date	25 th March 2021
Duration	17.00hrs – 19.10hrs
Location	Hexagon House, Spencer Hill, Marsa
ERA representatives	Mr. Kevin Mercieca, Ms. Josianne Abela Vassallo, Ms. Leonora Damato, Mr Yves De Blick
Minutes taken by	Ms. Marie Therese Vella (ERA)

Mr. Kevin Mercieca opened the online meeting giving details about the proposed development which is currently subject to an Environmental Impact Assessment (PA 9407/17 – EA 00015/17: Proposed development of Manoel Island, Gzira).

Details vis-à-vis the purpose of the meeting were provided, in particular that the meeting was part of the EIA process. It was also clarified that this was not the decision-taking meeting but was being held to present the EIA findings and to gather feedback from the public in due time for any relevant considerations to be factored in during the process.

The public was also informed that proceedings shall be recorded and that comments can be put forward in an anonymous manner. There were no objections for the online meeting to be held in English.

Dr Paul Gauci, the EIA coordinator, delivered a presentation explaining the findings of the studies carried out as part of the EIA.

Mr. Kevin Mercieca opened the floor for comments after the presentation and reminded the participants that they can also leave a comment in the chat being administered by ERA’s staff.

Ms. Astrid Vella (Flimkien ghal Ambjent Ahjar).

Ms. Vella raised a comment regarding the viewpoints shown in the presentation, whereby she noted that no viewpoint was taken from Gzira in the direction of the Valletta Bastions that assesses the impact of the most iconic view in this area. Ms. Vella asked for a clarification in this regard.

Another point was raised with respect to dredging, whereby Ms. Vella noted that dredging was mentioned on one side of the bridge but not with respect to the proposed breakwater. Ms. Vella enquired whether archaeological studies have been carried out.

Ms. Vella further pointed out that the EIA Coordinator mentioned that the presentation would focus on the present plans and not into the alternatives. One of the alternatives is the “No zero option”. Ms. Vella questioned why the public is not shown the full scope of the EIA, as it is part of the legal requirements of an EIA.

Ms. Vella also referred to the triangle of green that is being called the public garden, which has been cleared close to the proposed bridge. Ms. Vella asked about whether there are any commitments to ensure that this area will remain open to the public and not taken over by the commercial entities as a food court, as has happened at the developer’s other project in Tigne`.

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca pointed out that the first three questions will be addressed by the EIA Coordinator, for him to expand more on the aspects related to the viewpoints towards the bastions, the archeological studies relating to the dredging and the question about the zero option. With respect to the last question, Ms. Vella was informed that ERA will take note of this comment and will take it into consideration in its own assessment.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci explained that the EIA has a full chapter which discusses options, including the zero option, which basically means leaving Manoel Island as is. He explained that in chapter two of the EIA Report, the first option was also discussed in detail, being the master plan which was approved in 1999. Furthermore, he explained that this chapter also discusses the master plan which was approved in 2019, and the rest of the EIA Report discusses the current option. Dr Gauci stressed that the options were discussed, however, he explained that he was requested by ERA to limit the duration of the presentation to 30 minutes, so therefore had to prioritise from a document of 500 pages.

With respect to the comment on the viewpoints, Dr Gauci noted that Valletta can be seen from Sliema and from Gzira and from the photos shown Valletta is being hidden by the existing Manoel Island. He continued that in all the photos presented, Manoel Island occupies most of the foreground. Dr Gauci argued that Valletta can only be seen if one goes on top of a roof, however, the photos for the study are normally taken at eye level.

In response to the comment on dredging, Dr Gauci explained that this would indeed take place underneath the breakwater. The breakwater is proposed as a floating breakwater, with what is called a ‘berm’ underneath. He further mentioned that in chapter one of the EIA Report, the construction of the breakwater is discussed in detail, and he stated that no material should be affecting the marine underwater archeology. He also noted that fines have been imposed in the past for such impacts.

Mr Jorg Sicot (Flimkien ghal Ambjent Ahjar).

Mr. Sicot noted that the presentation does clarify some points which they had been discussing internally. However, he did raise a comment regarding the new roundabout leading into Manoel Island, which in his opinion had received very little attention in this presentation. Mr. Sicot stated that his organisation feels that that is a cause for concern since a very substantial part of the Gzira promenade would be cut short to accommodate this roundabout. Mr. Sicot informed that his organisation will be providing feedback in this regard, in writing as well.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci replied that the roundabout has been a requirement since day one, since 1992, when the Manoel Island and Tigne` Point development brief were issued and is specified also in the North Harbour Local Plan. He explained that this aspect was discussed in the traffic impact assessment, where the capacity of this junction was studied, since the number of vehicles increased.

Dr Reuben Grima (Archaeologist).

Dr Grima thanked the team for all their work achieved so far and requested the floor to highlight some gaps in the EIA report. Firstly, Dr Grima raised a comment with respect to the underwater archaeology section. He noted that the terms of reference include field work, and noted in the underwater archaeology report, an unevenness in detail and treatment between the work for the underwater archaeological impacts, compared to the work on the terrestrial impact. Dr Grima noted that on page 19, section 8, of the report, the reader is told that pricking probe tests were done to examine the depth of the sediment close to the bridge. He continued that given that parts of the terms of reference were field work, which we were told was done, he noted that no plan of the ancient rock cut features was included, about which there has been much debate in the press. Dr Grima further noted that instead the impact assessment reports include a photograph taken from the press. Dr Grima stressed that the purpose of the impact assessment is to inform on something which we did not know and raised concern in the absence of precise mapping of those ancient rock cut features. He also wished to emphasise again the importance of those features, which are by far the oldest trace of human activity anywhere in and around Marsamxett Harbour. Dr Grima continued that they also form a very important indicator of climate change and sea level rise over the past 2000 years. Dr Grima commented that having dredging and rock cutting works within a short distance of these features, potentially cutting into these features, at this stage, is of concern, given that the purpose of an impact assessment report is precisely to quantify, map out these impacts and to help take, at an early stage as possible, the appropriate mitigation action.

Dr Grima also raised concern after hearing that the berm below the floating breakwater will not impact the archaeology because there is nothing shaded in blue in the diagram. He noted that the reports also mention the expected sensitivity of the Lazzaretto waterfront, but commented that such needs to be graphically represented. Dr Grima explained that he would have expected to see a risk map including the entire section along the waterfront of the Lazzaretto shaded as a high risk, highly archaeological sensitive area. He continued that the sensitivity of that area after centuries of use, primarily during the period of the Knights of Saint John, is known, and that there are important deposits. Dr Grima stated that the proposed berm would certainly impact those deposits, and that there is no mention of it in the underwater archaeological impact assessment report is a serious gap which still needs to be addressed.

Dr Grima raised another point with respect to mitigation measures, which include the suggestion to have a monitor during the dredging operation. He explained that through his experience, he can tell this would be a disaster, as you cannot simply have a person watching as industrial scale dredging take place. He commented that the assessment of the deposits and any excavation of areas which are going to be damaged by dredging, need to be done in advance. The moment the dredging starts, visibility in

the water will be reduced to zero and if you spot something from the barge, that would already be too late, Dr Grima noted. He argued that there is a step before which is the actual assessment of the deposits themselves and where necessary, excavation. Dr Grima noted that the EIA is till blind to a large extent in terms of the underwater archaeology, and remarked that if it is felt that this is beyond the scope of the EIA, clear recommendations of works and methods before the actual dredging are expected.

Finally, Dr Grima raised a last comment regarding the issue of the underwater archaeology where parts of the island are to be removed, near the proposed dredging of the channel. He observed that this raises another point which has sort of fallen between two stools of the terrestrial archaeology report and the Marine Archaeology Report. He explained that parts of the island which will be removed could well contain part of the same archaeological landscape, of which the ancient rock cut features form part. Therefore, he considers it fundamental that at this stage there will be clear principles, method statements on the procedure to be adopted, where firstly the modern overburden needs to be removed, followed by the extensions of the quay in a surgical way which does not damage the underlying rock formations to allow the archaeological assessment of any potential features in the underlying rock. Dr Grima stated that the decision to cut the rock is not a decision to be approved now and expressed that the reply to this should not be because this is an outline permit. He stated that such would not matter as we have been here before and know the reality, that if something is approved at outline stage, changing that in detail is extremely difficult. Dr Grima continued that this is also of relevance the area proposed for development on the west of the island, where foundations of those buildings may impact the same underlying archaeological landscape, which would also require further exploration and investigation before a full development permit is considered.

Dr Grima then proceeded to the viewpoints mentioned earlier, whereby he stated that he could not find a discussion to the 2009 request by the World Heritage Committee to Malta to define a buffer zone around The World Heritage City of Valletta (to which he made a side note, that as far as he understands, this is still pending). Dr Grima argued that when looking at best practice in the definition of such buffer zones in cases like Cologne Cathedral or the Sydney Opera House, where you have a World Heritage site bordered by a body of water, common sense and good practice dictate that Manoel Island will be incorporated into that buffer zone. He further noted that this is a decision which is required and expected by the World Heritage Committee of the Maltese Government, being an ongoing discussion. Dr Grima observed that since the last EIA, in 2019, a correspondence between the World Heritage Centre and the Maltese Government about this issue took place, so he noted there should be a recognition that any measures are taken in light of this aspect and that the impact assessment provides a discussion of this. Dr Grima argued that past mistakes cannot be used as a pretext to justify perpetuating them, whilst referring to the rooftop additions to the lazaretto building, which he noted to be in past proposals, however, argued that the origin of this project goes back to before the request by the World Heritage Committee for this buffer zone. He continued that the purpose of the assessment is to allow fully informed decisions even though the buffer zone has not been formally declared.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci stated that there are some parts which he would address and others which Christian Dalton, who was responsible for the underwater archaeological studies, will address.

With respect to the archaeological pits, Dr Gauci replied that the images were reproduced from a paper which referred to the pits, and not from a newspaper. Dr Gauci expressed his disagreement with Dr Grima's observation on the approval through an outline development permit, that such is paving a way for the full development permit. He argued that there can be reserved matters when

deciding on the full development permit. Dr Gauci also stated that the reaction from the SCH to the studies, and whatever they recommend, will be taken on board by the ERA and the Planning Authority. Continuing on the aspect of reserved matters, Dr Gauci noted that reserved matters could include for example architectural design, but also the need for further research in the area where the berm is going to be located. He noted that the design of the berm has not been defined yet, and that intensive research of the exact area of the footprint of the berm would be required, once defined. Dr Gauci referred to other projects where more intensive investigations were also carried out after the EIA.

Mr. Christian Dalton (Archaeologist in the EIA).

Mr. Dalton continued the feedback to Mr. Grima, and referred to the dredging in the Gzira channel and its relation and potential impact on the rock cut features. Mr. Dalton noted that remote sensing is employed to best direct his advice and the content contained within the Marine Archaeology Assessment, however, such is fully based on the capabilities and the operating parameters of the side scan itself, as well as the sub bottom profiler. He explained that data was collected via both of those tools during a 2011 field work session, on the South side of Manoel Island and the creek itself, simply because this area was deep enough to facilitate access of the side scan. Mr. Dalton stated that these remote sensing techniques are implemented to have an impression of what is present within sediment column and resting on the seabed itself, however, the depth of the Gzira channel itself was not enough for the implementation of the side scan and the sub bottom profiling. He continued that such has factored into the advice for monitoring, which he advised in relation to the rock cut features themselves, being that they must not be altered in any way, that any impact of works must be monitored before, during and post-construction phase as well.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci continued his feedback with respect to the World Heritage Site and the buffer zone around Valletta, whereby he remarked that the SCH should comment about this, and that he expects to see a detailed report from the best expert in this matter. Dr Gauci also pointed out that ultimately the EIA is not just what the consultant writes, but is also a contribution from the public and the consultees.

Ms. Astrid Vella (Flimkien ghal Ambjent Ahjar).

Ms. Vella continued on the discussion on the photomontages and the viewpoints, whereby she commented that the photomontage of the Lazzaretto from Ta' Xbiex (the water waste management site), were taken from a height, not from street level, and that if they would have been taken from the street, more of the fortifications would have been hidden. Ms. Vella expressed her concern in this regard. Furthermore, she remarked that the EIA Coordinator indicated that the Valletta bastions cannot be seen from Gzira, whereby she showed a photo of the Valletta bastions taken from the Gzira promenade from ground level, to proof that the Floriana and Valletta bastions can be seen from Gzira. Furthermore, she noted that that is the position that would be hidden by the massive block of apartments, the ones close to the proposed bridge. Ms. Vella expressed concern with respect to the EIA Coordinator's statement and that such viewpoint was not included in the EIA.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci argued that before photomontages are prepared, a proposal for the baseline photos are submitted to ERA, discussed and agreed. Dr Gauci showed the photomontage from Rampa ta' Ta' Xbiex, which he said was taken from street level and submitted for approval by ERA.

Mr. Michael Sciortino (Public).

Mr. Sciortino further commented on the viewpoints, whereby he showed a photograph taken from the Gzira promenade, showing the Phoenicia Hotel with the Valletta Bastions and St Publius church. Whilst showing additional photographs, Mr. Sciortino argued that Valletta can be seen, including from all the side streets leading to the Gzira promenade, and that if the proposal goes through, these views will be gone.

Regarding the land reclamation, Mr. Sciortino requested a clarification whether the developers have renounced permanently the land reclamation or whether they will re-submit another application in the future.

Mr. Sciortino also asked whether a Social Impact Assessment was carried out, whilst making reference to gentrification. He further argued that the removal of a big chunk of the promenade, located in the heart of Gzira, is also a social impact.

Another comment was raised by Mr. Sciortino, with respect to the roundabout. He noted that the North Harbour Local Plan also mentions another road from the Regional Road leading to Manoel Island and to Tigne` and the embellishment of the Gzira promenade, and queried where this road and the embellishment are.

Mr. Sciortino continued with the aspect of traffic, whereby he commented that the trip generation for the transport impact assessment only took a fraction of the standards set out by the Planning Authority. He also expressed his opinion with respect to the neutrality of the EIA.

With respect to the cultural heritage, Mr. Sciortino referred to a decision by the EPRT, which annulled the decision of the masterplan PA/09407/17 and noted that the EPRT asked for everything to be reverted back to before the annulled EIA. In this regard, Mr. Sciortino queried why the bovine was demolished. He further stated that in the original EIA, it was mentioned as Store C, and nothing was known about it. Mr. Sciortino argued that no searches were done apart from the conflict of interest, and that it is now known that this structure formed an integral part of the function of Manoel Island, as a bovine where animals like cows and bulls were quarantined. Mr. Sciortino queried how they will be getting this building back due to EPRT's decision.

Mr. Kevin Mercieca (Environment and Resources Authority).

Regarding the land reclamation, Mr. Mercieca noted that the aim of this EIA is to assess the impact from this current proposal and not the land reclamation, as it is no longer included in this proposal. Any other proposals will be assessed on their own merits. Regarding the Social Impact Assessment, Mr. Mercieca stated that this does not fall within the remit of the EIA or ERA, as this is a study processed through the Planning Authority. Therefore, Social Impact Assessment cannot be discussed here.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci argued, in response to Mr. Sciortino's comments, that from the photos, Manoel Island dominated the foreground, and that he provided what the Authorities asked for.

Dr Gauci stated the importance and the need for a roundabout, due to traffic coming in and out of Manoel Island, which would ensure a smoother flow of traffic and reduces pollution. He argued that the type of traffic generated by the project requires a junction which has the capacity to handle that traffic. He noted that this was specified clearly in the development brief and later in the local plan. The permit for the road linking Manoel Island with the Kappara Junction was approved but later reversed by the Board of Appeal due to a third party ownership.

Lastly, Dr Gauci expressed his disagreement with criticism directed to him personally, in terms of conflict of interest.

Mr. Michael Sciortino (Public).

Mr. Sciortino replied that the criticism was made by the EPRT in its conclusions and was directed at Dr Gauci.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci replied that the EIA was annulled, but not the development permission, and expressed his own reservations towards a member of the board. He explained that he did not raise these concerns at tribunal stage as he was not present at that specific time.

Ms. Astrid Vella (Flimkien ghal Ambjent Ahjar).

Ms. Vella underlined her concern with respect to the viewpoints and the replies given by the EIA Coordinator, in that the bastions cannot be seen from Gzira except from a higher level.

Ms. Vella continued with regard to the photomontage of the Lazzaretto, arguing that there are fixed parameters. She gave an example in that a photo taken from Abate Rigord Street is at street level but is also on the crest of the hill. Ms. Vella remarked that road level is being understood as sea level, and she strengthened here point that there is no sense in having photos taken at different heights, as it needs to be standardized.

Ms. Vella raised another comment, referring to protected view corridors. She queried why these were not included in the EIA and why there was no discussion as regards protected view corridors. She noted that there is a protected view corridor that runs directly from the area of university across to Valletta, with Manoel Island in the middle of this.

Lastly, Ms. Vella also raised a comment with respect to the roundabout, for which she proposed a solution. In order to avoid taking up a big part of the promenade, she proposed to relocate the roundabout to the area of the road in front of the Waterfront Hotel and Turkish kebab place, which would allow traffic coming from Valletta to go round and double back towards Manoel Island. She continued by indicating that a second roundabout can be placed in the wide area where there was the A1 bar, which would allow people exiting Manoel Island to turn back towards Sliema. Ms. Vella expressed her opinion that this would have a much more beneficial function, because it would also serve traffic coming from Sliema that needs to double back and would have two options. She indicated that this option is clear and that she is surprised that such was not discussed so far. Ms. Vella stressed that this aspect is not something they intend budging from, and that this option needs to be duly taken into consideration.

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca stated that this comment with respect to the roundabout is noted, and asked the EIA Coordinator to provide a reply with respect to the view corridors.

Dr Paul Gauci (EIA coordinator).

Dr Gauci clarified that in both Dr Conrad's report and the Coordinated Assessment, the view corridors were discussed, as well as the policy concerning these view corridors. He clarified that the policy talks mostly about high-rise, but anything which can have a substantial visual impact needs to be studied well and assessed before a decision is made. Dr Gauci stated that he did not take a position with respect to this particular policy, because it is not his responsibility, as it falls within the remit of the Planning Authority.

Mr. Michael Sciortino (Public).

Mr. Sciortino referred to the discussion on the roundabout and noted that the development brief, to which reference was being made, is 30 years old, and today's situation is totally different. Mr. Sciortino argues that such, requires fresh thinking. Secondly, Mr. Sciortino pointed out that the aspect of social impact is included in the terms of reference.

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca clarified that the terms of reference are issued by the authority and cover the effects of the proposal on certain elements which are related to social impact. The terms of reference do not require a full-blown social impact assessment. Mr. Mercieca noted that instead the title in the terms of reference reads “Effects on human populations arising from impacts on the environment”, which is different from a Social Impact Assessment.

Mr. Michael Sciortino (Public).

Mr. Sciortino argued that the terms of reference require a study on the effects on public health and social economic considerations, and that when it is described that property values will increase, that this is a social economic impact which needs to be studied, as in the terms of reference.

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca explained that there is clear guidance on what is and what is not covered, and that this issue has been raised before.

Mr. Michael Sciortino (Public).

Mr. Sciortino queried why it is then included in the terms of reference?

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca clarified that the terms of reference require that the effect on the human populations arising from impacts on the environment are studied in the EIA, but they don't go into the realm of socio economic studies and full-blown social impact assessments.

Mr. Michael Sciortino (Public).

Mr. Sciortino continued towards another comment, in terms of the assessment carried out by the EIA Coordinator, where he argued that the EIA Coordinator overturned conclusions reached by individual assessments without justification. He also mentioned that it is not clear whether the EIA is reporting what the population said when interviewed during the study, or whether it is the EIA Coordinator's decision.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci argued that the comment regarding social impact assessment is incorrect and that Section 4.3 of the EIA does provide brief discussion about gentrification, within the parameters of the terms of reference.

With respect to aspects raised during the EPRT, Dr Gauci, clarified that he is the editor of the contributions to a particular document, and that he always quotes and presents any feedback given by the consultants and the public, before giving his opinion. He furthermore stressed that this opinion can be different. With respect to the specific case mentioned by Mr. Sciortino, Dr Gauci replied that in this case the specific position was taken because the blocking of views (as raised by certain people interviewed during the study) is not a planning consideration, it is not in our planning law, except in the particular case where we have the visual corridors. Dr Gauci continued that the latter are specified in the local plan and have to be discussed and taken into consideration as the policy says. He further stated that irrespective of his position, he has the right to disagree with the consultants and with other people, as they are matters of judgement. Dr Gauci continued to stress this point and objected to the claims made.

Mr. Michael Sciortino (Public).

Mr. Sciortino stated that this is a public meeting, so every member of the public has a right to express himself.

Mr. Sciortino objected to the referral by the EIA Coordinator to one particular person's feedback in specific, and the Coordinator's comments thereon, when the visual assessment actually drew a generalized opinion based on the feedback from 250 or more people that were interviewed. interview 250 or more people, based on which the consultant drew a generalized opinion.

Dr Paul Gauci (EIA Coordinator).

Dr Gauci argued that the people's say was presented in the EIA and that the current visual impact assessment is totally different to what was written before. The consultant's comments were presented twice, first as a whole package and then quoted in the EIA. Dr Gauci stated that he took a particular stand in the assessment, where there were some differences, to make himself clear.

Dr Reuben Grima (Archaeologist).

Dr Grima took the floor to make a general observation with respect to the public consultation process by the Planning Authority, for which the deadline for representations closed the day after the Public Hearing, and thus before the process of public consultation on the EIA is concluded. Dr Grima stated that in his opinion this is not logical.

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca explained that the public consultation process led by the Planning Authority is different from this process, and it just happens that the Public Hearing was scheduled on this particular day. He further clarified that this meeting is in connection to the EIA process itself and that both at the Planning Authority's stage and at ERA's stage, there will be further possibilities where every member of the public can express their views.

Mr Michael Sciortino (Public).

Mr. Sciortino raised a comment with respect to timeframes, in that the period during which ERA is allowing the public to review is not enough for the public to participate as they should.

Mr. Kevin Mercieca (Environment and Resources Authority).

Mr. Mercieca clarified that the time allotted in the legislation is one month for the public to send in their comments, and that in fact the public consultation started on the 21st February. Mr. Mercieca further clarified that, in addition, ERA is giving another week following the Public Hearing to provide comments, until the 1st April 2021. ERA schedules the hearings at the end of the public consultation, to give the public enough time to familiarize themselves with the reports.

Mr Kevin Mercieca closed the meeting by confirming that the points raised have been noted. He also thanked the participants and invited them to send any further comments, preferably by email to eia.malta@era.org.mt, or by post to 'The Director, Environment and Resources Authority, Hexagon House, Spencer Hill, Marsa', by the 1st April, 2021.