

Environmental Impact Assessment

Screening report

PA file no.: TRK 162247

Other reference: EA 00030/15

Project Title: Retention of the historic existing facades of the Fort Cambridge barracks building and demolition of the existing southwest facade and internal structure. Proposed excavation and construction of a new high-rise hotel Class 3B including all ancillary facilities and amenities.

Location: Site at, Triq Tigné c/w, Triq il-Ponta Ta' Dragut, Sliema, Malta

Screening date: November 2015

1. Description of Proposal

1.1 Outline of project/development

TRK. 162247 is a development application which proposes the retention of the historic existing facades of the Fort Cambridge barracks building and demolition of the existing southwest facade and internal structure as well as proposed excavation and construction of a new high-rise hotel Class 3B including all ancillary facilities and amenities at, Triq Tigné c/w, Triq il-Ponta Ta' Dragut, Sliema, Malta. The proposal covers a site area of 2,506 sqm and will take the form of a high-rise 5 Star, 368-roomed hotel, including a number of ancillary facilities (such as shops, restaurants, and meeting rooms) and 214 parking spaces. The hotel will have an approximate total gross floor area of 39,000 sqm and an elevation of 40 storeys in height. The proposed development will be designed for the business traveller which together with its accommodation and leisure facilities, would be catering for the needs of corporate and upmarket visitors and equipped for meetings, incentives, conferences and events (MICE).

1.2 Site description and related considerations

The site is located on Triq Tigné c/w, Triq il-Ponta Ta' Dragut on the Tigné Peninsula, Sliema, adjacent to the Fort Cambridge residential complex (to the east) and Fort Cambridge (to the north). It is situated within walking distance of the Sliema Primary Town Centre and the emergent Tigné Point Secondary Centre.

The site is currently occupied by a 19th Century building which was originally the residential quarters (Barracks) for soldiers posted in a fort located adjacent to the site. In the 1980s, it was appended to a hotel, which was demolished in 2008 to be replaced by an apartment complex. The site was allocated for office development in 2007 through an outline development permission (PA 04144/06), although an application for a full permission was not submitted. The existing barracks were designed to form part of the Cambridge Battery (or Fort Cambridge), which was constructed in the 1880s and which weaponry in the fort included one of the well-known 100-ton guns. Initially, the barracks were two storeys high with an additional two floors being added later.

The proposed site is located 60m from the eastern edge of the Sliema Primary Town Centre as identified in the Sliema and Tigné Point Policy Map and 350m from the Pjazza Tigné (in the Tigné Secondary Town Centre). Both centres are among the most vibrant commercial zones in Malta which host a wide range of retail and food and beverage outlets. Over the past years, office developments have located in the Sliema centre and in a few years' time a business centre will commence operations in a building located adjacent to Pjazza Tigné.

The site is located within Development Zone and Fort Cambridge Ex-British Service Barracks. The development site also lies:

- approximately 30 metres from proposed Cambridge Battery (British Military Structure); and
- approximately 135 metres from an Area of High Landscape Value of the Harbour Fortifications (AHLV)
 - Various Localities (as per Gov. Notice 133 of 2001).



Figure 1: Aerial image of the site and its surroundings.

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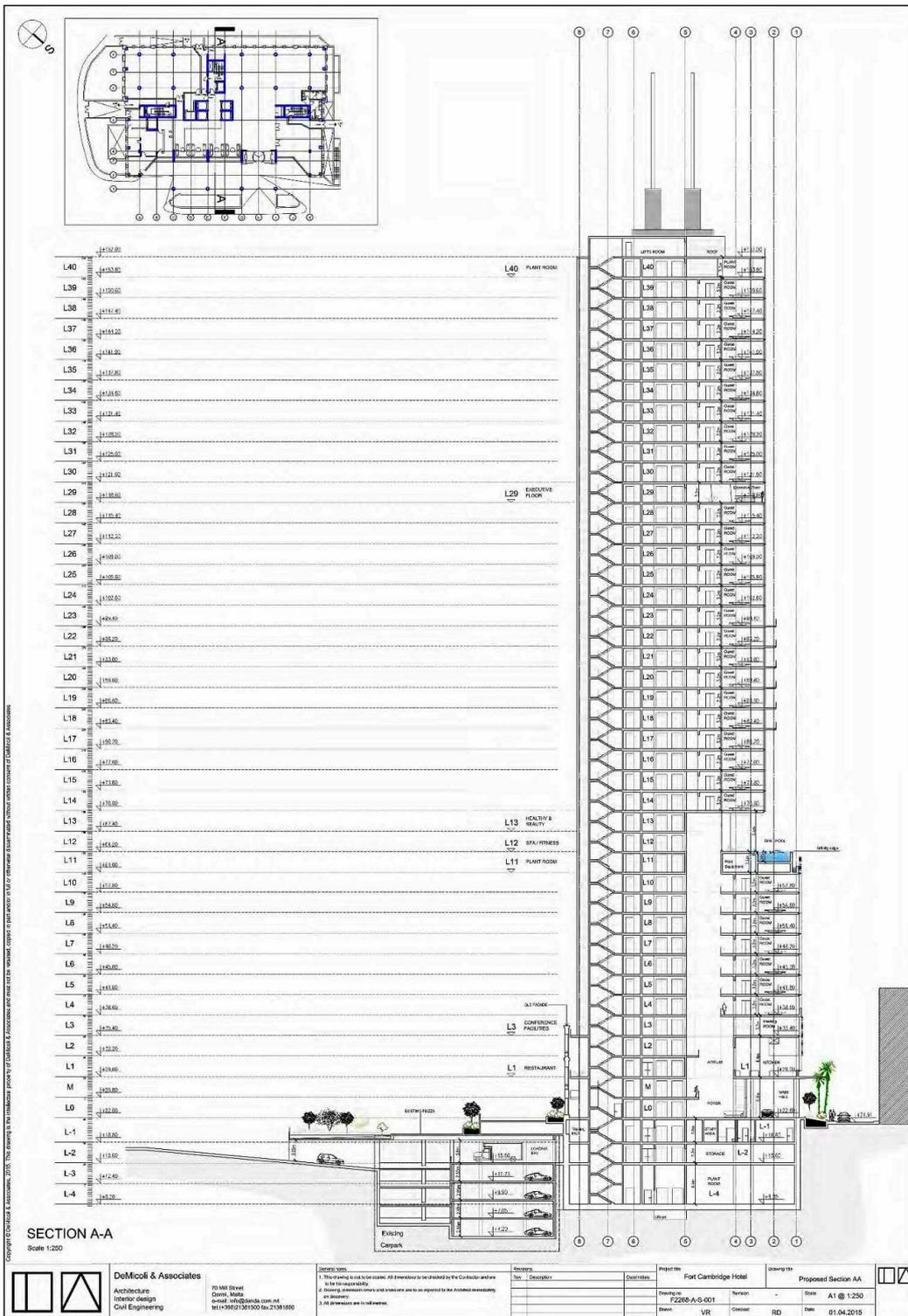


Figure 2: Layout of the proposed hotel.



Figure 3: View Point 3 of Proposed Development.

FINAL

2.2 Version of documents used for screening:

1. PDS dated 28th October 2015;
2. Plans, diagrams, various independent reports, visual assessment (min. 35a-an) dated 28th October 2015 (submitted as part of TRK162247).

3. Screening Matrix

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
1	Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, landuse, changes in water bodies, etc)?	<p>Yes. The proposed development has a total footprint of approximately 2,500 sqm and will take the form of a 5 star high-rise hotel with 368 rooms, including a number of ancillary facilities (such as shops, restaurants, and meeting rooms) and 214 parking spaces. The proposed hotel will have an approximate total gross floor area of 39,000 sqm and an elevation of 40 storeys.</p> <p>Although the site was a formerly occupied by a hotel with various building permits on site, the proposed complex will have an impact on landuse, the skyline and topography due to its height and massing. Additionally, this proposal can be considered as one of the highest buildings currently being proposed on the Maltese Islands.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>Yes. The proposal will result in a major intensification of built development in an area which is already densely developed. In addition, the proposal seeks to increase the height of buildings, thus disturbing the skyline of the surrounding area. The latter has a potential significant impact on the landscape and visual amenity in the area, including long-distance views given its location.</p> <p>An additional concern which relate to the construction of high-rise buildings is the potential impact of shadows in the surrounds of the buildings in question. Shadow studies for high-rise buildings can be tackled directly through the mainstream development permit mechanism.</p>	PDS Pg. 60, 63
2	Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Yes, the proposal will make use of natural resources such as <i>franka</i> stone blocks, steel, electricity, and water which are non-renewable and in short supply. Furthermore, the proposal includes the demolition of the building within the application site thus generating mainly inert material which are non renewable.	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. The use of such resources for a project of such scale and nature may lead to significant impacts that are unlikely to be mitigated, particularly in terms of resource consumption, including raw materials, water and electricity.</p>	PDS Pg. 93-95.
3	Will the Project involve use, storage, transport, handling or production of substances or	Yes. Dust during demolition, site clearance, excavation and construction may deposit in nearby residential dwellings and commercial areas, together with other emissions that would be generated by plant and	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>¹The amount of dust (during construction) and NO_x and PM₁₀ (during operation) and their significance to potentially negatively impact the surrounding residential neighbours and the coastal water body</p>	PDS Pg 102-103

¹ An assessment of the impact of the proposed development on air quality has been carried out concurrently with the PDS. The assessors have tested the impact of an additional AADT of 1,527 vehicles over the network AADT and the 'network + Town Square' AADT. This assessment may need to be revisited in the light of this EIA screening decision as part of the EIA process.

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
	materials or energy, especially any resources which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	<p>machinery during construction.</p> <p>During operation, NO_x and PM₁₀ from the operational traffic is expected.</p>	(the site boundary lies approximately 350 metres from swimming zone), are unclear.	
4	Will the Project produce solid wastes during construction, operation or decommissioning ?	<p>Yes. The waste generated by proposal includes: inert waste arising from excavation, demolition waste (including concrete, steel, glass, and timber), and waste (hardened concrete).</p> <p>During operations, the proposed development is likely to generate primarily municipal waste, which in addition to sewage and foul water, shall include packaging waste and kitchen waste, including waste oil.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. Considering the scale and size of the proposal, the impact of the proposed development may potentially have significant impacts given the projected quantities and ultimate disposal of the waste.</p>	PDS Pg. 94-95
5	Will the project release pollutants or any hazardous, toxic or noxious substances to air?	<p>Yes. Dust will be released during demolition, excavation and construction. During operation, an increase in NO_x emissions from operational traffic is expected. There will also be mechanical ventilation air conditioning and refrigeration during operation.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. Dust generation, during construction, is likely to be of a significant impact since major works are involved however further studies are required. Furthermore, the site is located within a sensitive site (close to sensitive receptors – residential) in relation to dust emissions.</p> <p>During operation, the proposal is likely to generate 1527 AADT (Annual Average Daily Traffic) to and from the site which is likely to lead to a significant impact vis-à-vis air quality, in an area which is already congested during peak traffic flows.</p>	<p>PDS Pg 100, 102-103.</p> <p>Traffic Impact Statement (TIS)</p>
6	Will the Project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p>Yes. The proposal will generate noise, vibrations, and light emissions during both construction and operation.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>In terms of noise emissions during construction, these will be short-term and temporary. Noise disturbance to sensitive receptors, namely residents and others working and visiting the neighbouring areas should be minimised during the construction phase and addressed with adequate measures through the Construction Management Plan. However, the extent and magnitude of the impacts are unclear.</p>	<p>PDS Pg 100-102, 103-110.</p> <p>Traffic Impact Statement (TIS)</p>

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
			During operation, the expected volumes of traffic generated are expected to be significant, as further inferred from the calculated 1527 AADT. Furthermore, given its proximity to sensitive receptors (residents) and considering the height of the proposed building, the impact from light, noise and shadowing remain unclear.	
7	Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes. Contamination of land and water may result from surface runoff which is likely to contain sediments arising from dust and debris deposited on the site as well as foul water arising from ablution facilities.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/>	PDS Pg 102
8	Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	No increase in the risk of accidents is envisaged, other than occupational risks typically associated with construction activity.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/>	/
9	Will the Project result in social changes for example, in demography, traditional lifestyles, employment?	Yes. During construction is it estimated that approximately 50-200 persons shall be employed. When fully operational, the proposal will employ approximately 310 people. Furthermore, an increase in commercial outlets, restaurants/cafeteria and hotel is expected.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/>	PDS Pg 91-92
10	Are there any such factors which should be considered such as the consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?	Yes. The constrained access roads leading to the site, as well as other potential infrastructural limitations, are such that the scale of the proposal is likely to introduce longer term pressures for relief roads and infrastructural facilities on other land in the vicinity. Such is associated with an increase in air quality impacts and noise emissions in the area.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/>	PDS Pg 93-103

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
11	Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	<p>Yes. The site is located within Development Zone and on a site proposed for scheduling as Grade 2 Fort Cambridge Ex-British Service Barracks. Refer to Question 19 for additional archaeological scheduled areas.</p> <p>There are no nearby environmentally protected or scheduled areas.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <hr/> <p>Unclear from an archaeological point of view. Reply to Question 19 refers.</p>	Internal Consultation
12	Are there any areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?	No formally designated areas for ecological,value are present.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Not relevant.</p>	/
13	Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	Reply to question 12 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Not relevant.</p>	/
14	Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Yes. Reply to Question 7 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 7 refers.</p>	/

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15	Are there any areas or features of high landscape or scenic value on or around the location which could be effected by the project?	Yes. The proposal lies 130 metres south of an Area of High Landscape Value (AHLV) for Harbour Fortifications (Gov. Notice 133 of 2001).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes; given the scale and height of the proposal (40 storeys high) the development may have significant impacts on the landscape and visual amenity of the area, including impacts associated with long-distance views.	Pg. 103
16	Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes. The site lies within the frequently visited area of Sliema, and is expected to dominate the latter and its surroundings, in particular the Tigné Peninsula. During both construction and operation, the proposal is expected to generate traffic to and from the site.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes. The proposal will see an increase in commuters to and from the site thus increasing congestion along main roads which are already prone to heavy traffic. Through the increase of commuters, the road junctions in the vicinities may require upgrading or redesign. Furthermore, since buildings are currently proposed very close to the perimeter of the site without allowing any significant buffer around the existing roads and junction, the proposal as currently formulated is also likely to pose a physical constraint that may hinder longer-term road upgrades.	PDS Pg 99-100
17	Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes. Refer to question 16.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Refer to question 16.	/
18	Is the project in a location where it is likely to be highly visible to many people?	Yes. The proposed development shall consist of a 40 storey high building, thus having potential implications for landscape and visual amenity, including long distance views in all directions.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes; the proposed development has potential significant impacts on the landscape and visual amenity in the area, including long-distance views given the site context and location.	/
19	Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	Reply to question 11 refers. Furthermore, the following are the main known items of cultural heritage value: a. Proposed for scheduling Grade 2 Ex-Military Barracks – within proposal site area; b. Grade 2 Letter Box (Gov. Notice 829 of 2007) – 8 metres west of site; c. Grade 2 Dwelling as per Gov. Notice 666 of 2006 – 20 metres northeast of site	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Although it seems unlikely that the proposed development will physically impact most of the features in the adjacent list, there is some concern regarding items (a) and (d) especially when considering the proposal as submitted and what the Fort Cambridge Development Brief (FCDB) 2006 is suggesting. The FCDB states in para. 2.3 that the	Internal Consultation

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
		<p>d. Proposed for scheduling Cambridge Battery and Glacis – 30 metres east of site;</p> <p>e. Grade 1 Nazzarenu Church (Gov. Notice 700 of 1995) – 110 metres southwest of site;</p> <p>f. Area of High Landscape Value (AHLV) for Harbour Fortifications (Gov. Notice 133 of 2001) – 130 metres south of site;</p> <p>g. Grade 1 Sea water Distilling Station (Gov. Notice 700 of 1995) – 160 metres south of site;</p> <p>h. Proposed for scheduling Garden Battery – 170 metres east of site;</p> <p>i. Grade 1 Villa Drago (Gov. Notice 730 of 1995) – 200 metres northwest of site;</p> <p>j. Grade 2 Majestic Theatre (Gov. Notice 666 of 2006) – 210 metres west of site</p> <p>k. Grade 2 Letter Box (Gov. Notice 829 of 2007) – 220 metres northwest of site;</p> <p>l. Proposed for scheduling 20th Century Showroom – 240 metres northwest of site; and</p> <p>m. Grade 1 Fort Tigne' and Glacis (Gov. Notice 133 of 2001) – 400 metres southeast of site.</p>	<p>building “<i>was designed and built in the early 1900’s and therefore together with Fort Cambridge, offers a valuable link with the past British period. Apart from its historical importance, it also significantly contributes to the character, identity and local distinctiveness of the area.</i>”</p> <p>A number of recent interventions have negatively impacted the overall value of the building. It is quite evident especially from historical records that the two existing upper floors are relatively recent additions. Moreover, the internal original fabric was also significantly modified.</p> <p>The FCDB clearly states that the building needs to be conserved and integrated through suitable reuse in any future development while allowing for internal alterations (para. 5.1 and para. 5.4). In para. 4.2h the FCDB states that the facade of the ex-Military Barracks building is to be retained. It is not clear whether the intention of the FCDB is to retain all four facades or the main facade. The proposal seeks to retain three of the four facades. The retained facade should be left unhindered and no structures are to be proposed.</p> <p>Regarding the height, para. 5.4 also states that “This building will act as a buffer between new higher development on the site and the surrounding residential blocks. No additional floors over the third floor will be allowed over this landmark building.” Para. 5.11b also states that “higher buildings than as recommended would adversely affect the historical low profile of Fort Cambridge, would contrast with the four floor height of the ex-Military Barracks”.</p> <p>It is also not clear if the proposed development will have any physical impacts on the Cambridge Battery Glacis.</p> <p>Although most of the proposal is in line with the FCDB, there may be some issues that may require further discussion. A Restoration Method Statement (RMS) (that still needs to be assessed) has already been submitted and the Superintendent for Cultural Heritage (SCH) and Cultural Heritage Advisory Committee (CHAC) are to be</p>	

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
			consulted during the processing of the said application.	
20	Is the project located in a previously undeveloped area where there will be loss of greenfield land?	No. The site lies in an area which is already built upon and committed for such development (touristic), albeit the proposal involves a development of a larger scale than that previously permitted.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No impacts on greenfield land are expected.	/
21	Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	Reply to Question 1 refers.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes. Reply to Question 1 refers.	/
22	Are there any plans for future land uses on or around the location which could be affected by the project?	Yes. The area, in particular the Tigné peninsula has been permitted with a number of large-scale urban development projects. There are a number of completed developments as well as other developments which are either being developed or are being proposed and awaiting development permit.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Unclear, given that there are a number of large-scale projects in the area, cumulative impacts are likely to result.	/
23	Are there any areas on or around the location which are densely populated or built up, which could be affected by the project?	Yes. The proposal lies within the development zone of Sliema and is situated within a densely populated area.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes. Replies to Questions 1, 3, and 6 refer.	/
24	Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship,	Yes. The proposal is situated within the densely populated locality of Sliema and is surrounded by a number of churches and a school.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> The amount of dust (during construction) and NO _x and PM ₁₀ (during operation) and their significance to potentially negatively impact these sensitive land uses, are unclear.	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
	community facilities which could be affected by the project?			
25	Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	Yes. Refer to Questions 1, 7 and 23 above.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Yes. Replies to Questions 1, 3, 6, and 7 refer.</p>	/
26	Are there any areas on or around the location which have already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Yes. The proposal lies within an area which is already subject to heavy traffic flow, dense urbanisation and additional pressures for further urban development projects.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Yes. Replies to Questions 1, 3, and 6 refer.</p>	/
27	Is the project location susceptible to earthquakes, or subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	In terms of location, the proposed development is not susceptible to extreme/adverse climatic events, such as earthquakes, subsidence, landslides, erosion or flooding.	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <hr/> <p>Unclear. Given the height and scale of the proposed development, potential impacts on the building which may result from extreme/adverse climatic events, such as earthquakes and strong winds is yet to be identified.</p>	/

4. EIA Screening Conclusion and recommended way forward

4.1 EIA screening conclusion

The detailed EIA screening document identified a number of environmental concerns that require further studies in order to establish the significance of such impacts on the environment. In this instance, the proposal qualifies for an EIA (EPS) under Schedule IA, Category II, Section 3.3.2.1 (*Construction of and extension to hotel, holiday village, hostel or tourist facility with a capacity of more than 500 beds*) of the EIA Regulations, 2007 (S.L. 504.79), targeted on the issues identified below:

- (i) Topography and physical changes to the site given the high-rise nature of the proposed development;
- (ii) Dust emissions during construction;
- (iii) Emissions to air with respect to traffic generation in and around the proposed site; and,
- (iv) Landscape and visual amenity, particularly with respect to long-distance viewpoints.

Furthermore, unclear impacts with regards to the following environmental parameters were also identified:

- (i) Use of raw materials during construction;
- (ii) Noise emissions and Vibrations during construction;
- (iii) Noise emissions during operation;
- (iv) Light emissions during operation;
- (v) Cultural Heritage Impacts;
- (vi) Cumulative impacts, particularly those related to traffic flows; and,
- (vii) Impacts on surrounding land uses.

Given the above, the EIA (EPS) should be targeted and focused on the above-identified environmental parameters.

4.2 Screening disclaimer

The above screening results, the ensuing conclusions and recommendations are without prejudice to any required changes or updates should the development proposal be eventually modified or should the information/assumptions provided turn out to be incorrect. Any deviations of the proposal from this submission would need to be re-assessed and the merits of this screening would need to be re-opened.