

ENVIRONMENTAL PLANNING STATEMENT

Demolition of all existing buildings forming part of St. George's Bay Hotel and ancillary facilities, Dolphin House, Moynihan House and Cresta Quay
Construction of parking facilities, hotels and ancillary facilities, commercial area multi ownership holiday accommodation, bungalows language school with accommodation and lagoon
Restoration of the Villa Rosa and upgrading of the facilities including parking facility, kitchen and toilets all below existing site levels within the Villa Rosa area to address catering facilities/wedding hall

Coordinated Assessment
Volume Five

Comments and Responses

02 September 2014

prepared by
ERSLI Consultants Limited

on behalf of
Garnet Investments Limited

Comments on the 1st draft of the Environmental Planning Statement (EPS)

TRK. 148158 (EA 00016/13): Demolition of all existing buildings forming part of St. George's Bay Hotel and ancillary facilities, Dolphin House, Moynihan House and Cresta Quay. Construction of Parking facilities, Hotels and ancillary facilities, Commercial Area, Multi Ownership holiday accommodation, Bungalows, Language school with accommodation and Lagoon. Restoration of the Villa Rosa and upgrading of the facilities including parking facility, kitchen and toilets all below existing site levels within the Villa Rosa Area to address catering facilities/wedding hall at St. George's Bay Hotel, and Cresta Quay, Ix-Xatt Ta' San Ġorg, San Ġiljan, Malta.

In the Responses the following references are made:

Coordinated Assessment Report: CAR
 Coordinated Assessment Report First Draft: CAR-1
 Coordinated Assessment Report Second Draft: CAR-2
 Coordinated Assessment Report Third Draft: CAR-3

MEPA Comments

Coordinated Assessment

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
1	/	/	Signed consultants' declarations in line with Regulations 28(3) of the EIA Regulations, 2007 (Legal Notice 114 of 2007, as amended) are to be submitted.	Submitted by email	Noted.	/
2	/	/	Sectional drawings of the various components of the proposal are to be provided for ease of understanding.	The reader is referred to the figures on pages 35 to 62 for additional architectural drawings in the second draft of the Coordinated Assessment Report (CAR-2). These drawings and others are also presented on A3 sheets in Volume Two of CAR-2	Noted.	/
3	/	/	Villa Rosa including surrounding gardens is being proposed for retention and re-use. Further details on any proposed works on the historic villa is required and this should be supported through the submission of a Restoration Method Statement.	A Restoration Method Statement (RMS) has been prepared by Perit David Grima. This is presented in a new Appendix Four,	Noted.	/
4	28	0.05	It is unclear how the underground car park including catering and sanitary facilities will be constructed especially given that no above ground constructions are proposed. This is also not in line with the section and elevation drawings submitted to MEPA in the tracking application where it indicates that construction will be above the existing road profile. EIA Coordinator to clarify.	Please note that para 05 of the first draft of the Coordinated Assessment Report (CAR-1) is located in the Introduction. In introductions of such reports, one should not expect to find detailed information about the project under consideration. As is indicated in the ToRs document such details should be made available in Chapter 1 of the Coordinated Assessment Report (CAR), assuming that the structure of the CAR reflects the structure of the ToRs document. The CARs prepared by this EIA Coordinator are always arranged in this manner.	Comment was not replied to. The statement in the introduction of the Coordinated Assessment Report (CAR) is stating that no above ground constructions are proposed however this is contradicting the section and elevation drawings submitted to MEPA in the tracking application where it indicates that construction will be above the existing road profile. Kindly confirm if constructions above ground are being proposed. If yes, kindly omit such a statement from EPS. EIA Coordinator's Response (13/08/2014) This matter has been discussed with Perit Sciortino, and he confirmed that the proposed development within the Villa Rosa site (i.e. Villa Rosa and Villa Rosa Gardens) does not involve constructions above road level.	Noted.

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
5	Chapter 1	/	The EPS is to consider the decommissioning phase aspect of the proposal as outlined in the EIA terms of reference.	This EIA Coordinator was present in a meeting with EPD officials when it was agreed that a decommissioning report is not required in the case of this particular project. The proposed land uses do not involve activities which require the storage and use of significant quantities of hazardous materials (such as fuels, waste oils, and so on). Furthermore, unlike industrial development, the lifetime of the type of development in question can be long (50+ years). Certain land uses may change in the future, and some modifications to the buildings may be carried out, however the buildings should be expected to be in use for a long time.	Noted. A justification on the matter was sufficient as agreed to in the said meeting.	/
6	31 & 32 41 & 42	/	The proposed underground parking (phase 5) for Villa Rosa is not marked as a zone (Table 1-1 and Figure 1-1). If it is being included in Zone K this should be clearer in the EPS and in para. 1.2.1.3. If not, a separate zone and description should be included.	Table 1-1 has been revised in CAR-2, and a drawing showing Zone K is reproduced in Figure 1-3 on page 37 In the same CAR-2	Noted. Kindly correct typo error in Table 1-1 (pg33) where the number of parking spaces proposed in zone K is indicated as being 1,5435. EIA Coordinator's Response (13/08/2014) The overall capacity of the parking facilities in Zone K would be 1,449 vehicles. Table 1-1 has been revised accordingly in the Third Draft of the CAR (CAR-3)	Noted.
7	35; 42	Figure 1-3 1.2.3.	The vehicular/pedestrian entrance/exit route for the proposed northern most underground parking (phase 5) for Villa Rosa is not indicated and neither described in relevant sections.	The corresponding drawing is reproduced in Figure 1-8 on page 42 in CAR-2	Noted.	/
8	35 & 36	Figures 1-3 1-4	It is being understood that neither a tower crane nor a mobile crusher will be installed during the construction of the underground parking (phase 5) for Villa Rosa. EIA Coordinator to clarify. Further details with regards to the excavated material disposal and construction method are to be provided.	The crusher would be used during the excavation works that is before the construction of the parking area. The tower cranes would be used throughout the construction works including the excavation works, their function being the minimisation heavy vehicles (e.g. mobile cranes and HGVs) being driven all over the construction site	Noted. Kindly clarify in the second draft EPS why tower cranes will be reinstalled in Phase 5 of the proposal, in areas which would have already been constructed during phase 1 (Figure 1-25, pg 59). EIA Coordinator's Response (13/08/2014) Perit Sciortino has informed me that the part of Zone K in the Villa Rosa grounds will be constructed during Phase 4, hence the presence of a tower crane in that particular location in the Phase 4 phasing drawing. Please note that Phases 4 and 5 in CAR-1 and CAR-2 have now been changed to Phase 5 and 4 respectively as is shown in Figures 1-15 (on page 50), 1-23 (on page 57), and 1-24 (on page 58) in CAR-3. Please also refer to the clarified section on the phasing on page 60 of CAR-3.	Noted.
9	33	Figure 1-1	Another illustration marking the extent of Zone K is to be included.	Agreed. The reader is referred to Figure 1-3 on page 37 In the CAR-2	Noted.	/
10	42	1.2.1.3	Is the underground parking (phase 5) for Villa Rosa part of Zone K?	Phase 5 does not refer to the parking zone (Zone K). Zone K will be constructed prior to the commencement of specific phases.	Noted.	/

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
11	43	1.2.3/C	Figure 1-6 indicates that the excavated material from the underground parking (phase 5) for Villa Rosa is substantial (29,568 cu.m) and will amount to almost 20% of all the excavated material from the whole site, however no details on its disposal and transportation was provided in the EPS especially given the site's proximity to the residential units.	This matter is studied in the Traffic Impact Statement. Please refer to Figure 1-26 on page 62 in CAR-2 for a map showing the routes which would need to be taken by outbound and inbound construction vehicles.	Noted.	/
12	43	1.2.3/C	During construction, the proposal will make use of an on-site stone crusher however the EPS does not provide a justification for the use of such equipment given the potential adverse impacts assessed in the EPS. Furthermore, is the number of trips provided in the paragraph with or without the use of a stone crusher?	The crusher would be needed in order to minimise the size of the excavated material which would in turn serve to reduce the number of HGV trips given that the smaller the grade of the materials the smaller the size of air pockets in the loading boxes of the HGV. The figures in the CAR refer to the crushed material. If the material is not crushed one would need to apply a relatively high bulking factor for the calculations.	Noted.	/
13	44	1.2.5.2 - 1.2.5.5	No details were provided with regards to the electricity demands for zone K. A justification in this regards is to be provided.	The corresponding figures have been added at the end of Section 1.2.5. Appendix Three has also been updated	Noted.	/
14	54	1.3.1.14	On what basis is the expected waste generated during construction determined as low? EIA Coordinator to clarify.	When compared to the waste generated during demolition and excavations, the waste generated during the actual construction works would be minimal. Modern construction systems and the increases in the cost of materials and of waste disposal has led many contractors to adopt systems which minimise waste production. For example, the use of precast reinforced concrete components (such as floor slabs) means that contractors have a very high level of control over the production process and quality control, which would in turn minimise waste production (of both concrete and steel reinforcement).	Noted.	/
15	125-127 255-256	3.3.5/A & 4.1.3/C	A proposed block plan superimposed on an aerial photo indicating the extent of Ghar Harq Hammiem in relation to the proposed buildings is to be provided. Furthermore, a sectional drawing indicating the extent of the existing Ghar Harq Hammiem below the surface in relation to the proposed excavations and development is also to be submitted.	The information is submitted in Figures 1-9 to 1-11 on pages 43 to 45 in CAR-2. It should be kept in mind that Chapter 3 of the CAR is concerned with the baseline and not with the proposal. The requested information should be presented either in Chapter 1 (project description) or in Chapter 4 (assessment of the likely impacts of the proposed project). In order to introduce the reader as early as possible to the concern for the integrity of the Harq Hammiem cave this EIA Coordinator inserted the requested information in Chapter 1 of CAR-2. It should also be noted that Figure 3-37 (on page 124) of CAR-1 shows on an aerial photograph the cave in relation to the existing buildings.	Noted.	/

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
16	127	3.3.5/B	This section should also consider the segment of the valley passing through the proposed site. This must include the innermost part of the site which still largely retains the natural valley landform despite a range of old accretions.	This section of the CAR is updated with reference to Saviour Scerri's revised report.	Noted.	/
17	127 / 136	3.3.5.16 and 3.3.5.17 3.4.3	Further details are to be provided on the current watercourse of Wied Ħarq Ħammiem especially its course through the present Villa Rosa grounds. This should be supported through the submission of images that show the said watercourse.	This section of the CAR is updated with reference to Saviour Scerri's revised report.	Noted.	/
18	129 - 131	3.3.7.	A borehole for rock samples was not drilled at the location where the underground parking (phase 5) for Villa Rosa is being proposed. A justification in this regards is to be provided.	The whole site, including the car park is located on Lower Coralline Limestone. The number of boreholes excavated by continuous coring and the depth is considered by Scerri sufficiently representative of the whole site.	Noted.	/
19	181-187 283-287	3.6 4.1.7	The EPS lacks a detailed analysis of the cultural heritage features identified on site, the impacts of the proposed development on such features and the proposed mitigation measures (as required by the terms of reference).	Samut Tagliaferro opted to revise her report, a copy of which is submitted with this document. Another team of cultural heritage consultants, namely ASC, were also commissioned in order to cover assets which were not considered by Samut-Tagliferro The corresponding sections of the CAR have been updated in CAR-2.	Noted. However kindly note that the proposed development should ensure that the landscape within the area proposed for scheduling (Villa Rosa Gardens) is to be minimally disturbed. As stated in section 5.1.2.6 of the EPS, the EMS chapter of the CMP is to cover the mitigation monitoring regarding the cultural heritage. The RMS/WMS regarding the works abutting the scheduled Villa Rosa have been submitted and will be assessed at full development stage. EIA Coordinator's Response (13/08/2014) Agreed	Noted.
20	181-187 283-284	3.6 4.1.7	From a cultural heritage perspective, details pertaining to excavation works within the Villa Rosa gardens and abutting Villa Rosa and entrenchment are lacking and therefore this must be taken into consideration in the assessment of impacts. Furthermore kindly note that a Works Method Statement may be required at a later stage.	The approach to excavation works is described in Figure 1-8 (page 40) of the CAR-1 (and reiterated in CAR-2). This EIA Coordinator agrees with the need for a more detailed excavations method statement, which would have to be presented in the Construction Management Plan (CMP) that is normally requested by the MEPA. This being said the excavation works should be monitored continuously.	Noted. Refer to response in question 19. EIA Coordinator's Response (13/08/2014) Agreed	Noted.
21	181-187 283-284	3.6 4.1.7	The EPS and the Cultural Heritage Assessment does not identify and assess three items of cultural heritage significance: (i) Grade 2 scheduled letter box (GN No. 829/07 GG Date 10.09.07), (ii) Grade 1 scheduled Military Entrenchment (GN No. 628/08 GG Date 21.07.08) abutting the Cresta Quay development; and (iii) the proposed scheduling of the Villa Rosa Gardens. Therefore, potential impacts and mitigation measures are to be provided in relation to these features.	Please refer to the revised Sections 3.6 and 4.1.7 in CAR-2	Noted. Refer to response in question 19. EIA Coordinator's Response (13/08/2014) Agreed	Noted.

No.	Page	Para	Comment (25/(13/2014))	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
22	187	3.6.4 Table 3-5	Reference is being made to point number 4 and 5 of the table. The correct protection level should read Class B not Grade B.	Corrected in CAR-2	Noted. Refer to response in question 19. EIA Coordinator's Response (13/08/2014) Agreed	Noted.
23	187	3.6.4.2	Moynihan House is not a scheduled property but is categorised as a Grade 2 proposed for scheduling property.	This EIA Coordinator was/is aware of this. To date no Government Notice indicating that this property should be scheduled has been issued. It appears that the proposal for the scheduling was made several [9?] years ago.	Noted. Refer to response in question 19. EIA Coordinator's Response (13/08/2014) Agreed	Noted.
24	197	Figure 3-76	For ease of reference, two separate figures are to be provided one indicating the monitoring stations for noise and the other for vibrations.	Done in CAR-2	Noted.	/
25	218	Summary of Impacts 6	The EPS considered potential impacts of shadowing from the proposed development upon the structures of lower height however does not specify if there will be any shadowing on the nearby bay. EIA Coordinator to clarify.	A shadows study of the proposed development was commissioned and is presented in CAR-2 specifically on pages 241 to 246	Noted.	/
26	220-223	4.1.2.	The assessment of landscape effects is to assess the effects of the proposed changes and development on landscape as a resource. The landscape assessment is to establish the landscape baseline and should identify the elements and features of the landscape, the landscape character and key characteristics and consider the value attached to the landscape. This assessment should also identify the landscape receptors, the interaction between the proposal and landscape receptors, identify and assess the likely landscape effects and propose mitigation measures. In particular, the assessment should focus on: (i) Villa Rosa and its surrounding gardens; (ii) the coastal area and beach at St. Georges Bay; (iii) the valley in relation to the open area along Triq il-Profes Walter Ganado; (iv) the streetscape along Triq Santu Wistin, in relation to the proposed development; and (v) any other element, as applicable. This must also be reflected in the summary of impacts tables.	The landscape and visual impact assessment in CAR-1 provides the decision maker with the information required for the making of an informed decision. No changes have been made in CAR-2.	Noted, however EPD is of the opinion that the said assessment should have taken into consideration and assessed the landscape features identified in EPD's original comment. EIA Coordinator's Response (13/08/2014) Noted	/
27	105 -117 226 - 247	Viewpoints	A3 copies of the photographs (both baseline and photomontage) are to be provided.	The baselines and photomontages are presented in an A3 booklet in Volume Three of CAR-2	Noted.	/
28	222 - 223	Table 4.7 - 4.8	Reference is made to the nature of the impact provided on landscape impacts of the proposed development regarding the increased urban mass, density and coastal encroachment within the St. George's Bay area assessed as 'Involves a subjective judgement depending on the receptor'. While it is understood that landscape can be a subjective element in relation to the proposed urban mass and density within the St. George's Bay, the nature of the impact needs to be clearly provided in terms of the sensitivity of the landscape receptors to such change.	A judgement of the type which is requested would simply be the opinion of an individual, and would not be of any use for the decision-making purposes. The material presented in this part of the CAR is sufficient for the making of an informed decision.	Noted even though EPD do not agree with the response provided by the EIA Coordinator. EIA Coordinator's Response (13/08/2014) Noted	/

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
29	223	Table 4.8	The extent and direction (towards the rocky shoreline to the east or the sea to the north) of the proposed encroachment is unclear. In the introductory sections of the EIA, encroachment upon undeveloped coastal area was not outlined. It is important to note that in the opinion of the EPD no further development or encroachment onto the sea or onto the currently undeveloped rocky shore flanking the northeast of the proposed development is to be allowed. The undeveloped natural stretch of coastline is to be safeguarded especially against potential future expansion. This is inline with the Project Description Statement originally submitted and the various meetings (one on site) held with architect/applicant and MEPA.	The proposed Cresta Quay development entails an encroachment on undeveloped land. Please refer to Figures 1-12 to 1-14 on pages 46 to 48.	Noted.	/
30	240-241, 249	Figure 4-15 Figure 4-16 4.1.2.25	From photomontage provided in Figure 4-15 and 4-16 and in paragraph 4.1.2.25, the Cresta Quay proposal includes extended encroachment onto the shoreline. However, throughout the rest of the EPS and in plans provided there does not seem to be any encroachment on the sea expected from the proposal. It is important to note that from an environmental point of view there should not be further development or encroachment onto the sea. EIA Coordinator to clarify.	As is shown in the drawings shown the plans of the Cresta Quay development, there are no plans for the development to reclaim land.	Noted.	/
31	234 - 247	Vp 5, 6, 7, 9, 10	It can be evident from the various photomontages (vp 5, 6, 7, 9, 10) that there will be a substantial increase in urban mass and density especially within Zone A and Zone F. Furthermore, as a result of the proposed development in Zone A, Villa Rosa from certain areas which is nowadays visible is obscured as a result of the project. Although the EPS in section 4.1.2.26 states that it shall not exceed the existing Bay Street complex party wall, the photomontages seem to illustrate that further massing towards ix-Xatt ta San Ġorg road is being proposed. It is in EPD opinion that the proposal in Zone A and F should be downscaled to reduce the significant visual impacts.	Perit Sciortino sought to address this issue by 'terracing' the buildings in question. The above-mentioned shadow studies highlight this terracing very well. In order to enhance/soften the appearance of the buildings, the terracing could be taken advantage of and turned into a hanging garden.	Noted.	/
32	250 - 253	Table 4-15 Table 4-21 Table 4-23	Whilst acknowledging that the nature of the impact is a subjective judgement depending on the receptor, this should still be assessed as either adverse/neutral/beneficial in order for the EIA to be conclusive.	The requested judgment cannot be conclusive as it would be the opinion of one person. This section provides the decision maker with sufficient information on the basis of which the application in question can be determined.	Noted even though EPD do not agree with the response provided by the EIA Coordinator. EIA Coordinator's Response (13/08/2014) Noted	/
33	254	4.1.2.34	A conclusion should be provided on the potential impacts from the proposal rather than proposing another study to determine impacts. The EIA should be conclusive in this regard in order to assist in the decision making.	Paragraph 4.1.2.34 is removed in CAR-2 for the simple reason that it is not possible for judgments on aesthetics to be based on numbers.	Noted.	/

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
34	256-257	4.1.3/D	A table is to be included summarizing the likely impacts of the proposed development on the geology and geomorphology of Għar Ħarq Ħammim.	An assessment of the impact on the cave has been included and a summary of impact table added in CAR-2. Scerri submits that that Għar Ħarq Ħammim is a sub-surface feature which can be affected by vibrations should the excavations be carried out by means of a pneumatic hammer. The proposal for the use of a chainsaw for excavations in this area would not produce vibrations	Noted.	/
35	255-257 258 - 260	4.1.3 & 4.1.4	The Geomorphology, Hydrogeology and Hydrology assessment should include the potential impacts on Wied Ħarq Ħammim morphology and its watercourse in the light of the EPD's objection to the obliteration of the still-extant natural valley landform in the inner part of the site. The proposal should be redesigned in a manner that eliminates the interventions in this part of the site.	This section of the CAR has been revised in CAR-2 with reference to Scerri's updated ESR	Noted.	/
36	265-282	4.1.6	Assessment of impacts of the development on all protected species should be provided. Also refer to comments to Ecology and Vertebrates Reports below.	The ecology consultants would like to know which 'protected species' does this comment refer to? The ones that were recorded during the surveys in April 2014 or does it also refer to others that were recorded in the past and not noted during the present survey? The assessment of impacts implicitly includes impacts on protected species when describing impacts on sensitive receptors	The consultant is kindly informed that assessment of impacts should be carried out on all protected species recorded in the area including past records unless these have been subsequently revised in the light of further evidence. Basing assessment of impacts on protected species recorded in a survey carried out at one particular season (e.g. April 2014) is likely to lead to the omission of due consideration of some protected species which at the time of the survey would not be noted such as <i>Allium lojaconoi</i> which flowers between May and June and is therefore unidentifiable earlier on and is therefore not acceptable. Other protected species not considered in the EPS include <i>Elatine gussonei</i> which is also present in rock pools, <i>Euphorbia pycnophylla</i> , <i>Chamaerops humilis</i> , <i>Moraea aegyptica</i> , <i>Ophrys fusca</i> , <i>Ophrys mesaritica</i> , <i>Orchis fragrans</i> , <i>Orchis collina</i> , <i>Orchis lacteal</i> , <i>Spiranthes spiralis</i> and <i>Zannichellia melitensis</i> .	Noted subject that: (i) no storage deposits (incl. contaminants) are to be placed within the valley; and (ii) the machinery and heavy vehicles are not allowed on sensitive areas hosting protected species and habitats. These will be included as permit conditions.
					EIA Coordinator's Response (13/08/2014) The plants listed as 'Protected Species' and that were not observed during field surveys may be classified into a number of groups according to their life form. Species characterised by similar life forms would have relatively similar habitat preferences (given the size of the area under consideration) and would therefore be expected to be subject to the same pressures (due to their proximity to each other) and to exhibit the same broad responses to these pressures. continued overleaf	

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
					<p>The relevant life forms are the following: Geophytes: <i>Allium lojaconoi</i>, <i>Moraea</i> sp., all Orchidaceae Hydrophytes/amphiphytes: <i>Zannichellia melitensis</i>, <i>Elatine gussonei</i> Therophytes: <i>Euphorbia exigua</i> var. <i>pycnophylla</i> (<i>E.pycnophylla</i>) Phanerophytes/nano-phanerophytes: <i>Chamaerops humilis</i> Habitat preferences: The geophytes and <i>Euphorbia exgiua</i> var. <i>pycnophylla</i> would be expected to colonise the rocky valley sides of Wied Harq Hammim, exploiting accumulations of soil within infilled solution hollows. The aquatic plants, <i>Elatine gussonei</i> and <i>Zannichellia melitensis</i> would be present in temporary freshwater rockpools in solution hollows. The Dwarf Fan-Palm (<i>Chamaerops humilis</i>) would be expected to colonise the valley sides or valley bed.</p> <p>The specific impacts that these species may be potentially subjected to are the following:</p> <ol style="list-style-type: none"> 1. Demolition of existing structures followed by excavation of rock in the proposed sites and construction of the proposed structures; This is unlikely to constitute a relevant impact for any of the life forms considered as their characteristic habitat is not within the proposed footprint of development. 2. Storage of excavated rock and soil; This impact would not be expected to be relevant unless the storage depots are situated within the valley. Redistribution of particulate by wind may represent a possible impact. However, this should be seen in the context of the recent and dense construction development in the general vicinity of the valley over the past two or three decades, suggesting that this impact has operated recently and may be ongoing. 3. Storage of possible contaminants; This is unlikely to affect the valley habitat as any fluid flows arising with the areas proposed for development would travel towards the sea and away from the valley. <p style="text-align: right; color: red;">continued overleaf</p>	

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
					<p>4. Use of heavy machinery and heavy vehicles and attraction of higher volumes of vehicular traffic; This impact is unlikely to be relevant to the species in question as any spillages arising from vehicular traffic would travel towards the sea.</p> <p>5. Site illumination; This impact is unlikely to be relevant for the species concerned. The surrounding areas are consistently illuminated suggesting that any possible selection for tolerance to this pressure would already have operated.</p> <p>6 Introduction of species to be used for landscaping. All of these species, with the exception of the aquatic plants, may be susceptible to competition from invasive species escaping from cultivation. Any escapes that would be capable of exploiting the valley sides and valley bed may, pre-empt habitat from annual plants and provide competition for perennial plants. This would present a lower risk for the aquatic plants as the rockpool habitat is colonised by highly specialised species living close to their biological limits. It is unlikely that any ornamental plant introduced within the proposed development would represent a long-term threat to the characteristic pool flora. It should be borne in mind that the presence or absence of particular species in these pools is a function of climatic patterns and stochasticity of responses and may not reflect responses to competition from invasive species.</p> <p>7 Use of pesticides and fertilisers for maintenance of landscaped areas. This impact may not be relevant to the species concerned unless very large volumes of pesticide are introduced into Wied Harq Hammim from any landscaped areas. It should be noted that the above and other clarifications re the ecology aspect have been inserted in CAR-3 on pages 205 and 323.</p>	

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
37	266, 268 273, 275	4.1.6.6 & 4.1.6.20, Summary of Impacts 1 & 3	The obliteration of biological communities through the demolition, excavation and construction works and the storage of excavated material during construction phase, for which no mitigation measure is being proposed, is being assessed of low to moderate significance and of low significance, respectively. Clarification for this assessment is required.	As indicated in the ecology reports, the plant communities in the footprints proposed for development comprise species that are characteristic of the early stages of secondary ecological succession and that are widespread throughout the Maltese Islands. The impacts have been categorised as 'moderate' as this assesses the effect of the development on the stability of the existing ecological communities and not on the conservation value of individual components of these assemblages. As such, in terms of the definitions described in Table 4-28 (in CAR-1), the construction works may exert an impact of 'moderate' significance whilst storage of material, presumably occupying a smaller footprint, would be expected to exert an impact of 'low' significance.	Noted.	/
38	272	4.1.6.50	Mitigation measures, other than monitoring of leakages, need to be adopted to ensure that the use of pesticides in the vicinity of Għar Ħarq Ħammiem does not affect the ecology it sustains. Kindly address.	It should be expected that the personnel responsible for the maintenance of the landscaping scheme of the proposed development would be trained and expected to follow the guidelines and legal documents identified in Malta's Action Plan for Sustainable Use of Pesticides, which was issued in 2012 by the Malta Competition and Consumers Affairs Authority. Other mitigation measures would include monitoring of the application of biocides in order to ensure that the amounts released do not exceed those that are strictly necessary. Biocides with a low residence time in the environment should be used in preference to those that degrade less easily. Biocides should also be applied when weather conditions (wind, rain) are such as to not result in the transport of such biocides outside the area of application, which should be as limited as possible in those parts of the development closest to the cave. The use of pesticides is regulated	Noted.	/

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
39	278	Summary of Impacts 6	The measures to mitigate the disturbance arising from noise and vibration on susceptible fauna caused by the demolition, excavation and construction works as well as the operational phase of the development, including the increased traffic generation, need to be clearly specified and the residual impacts evaluated accordingly	<p>Noise generation will be an issue during construction works, and the corresponding mitigation measures are indicated in the final chapter of the CAR. In the event that the proposed development is approved more detailed mitigation measures would need to be presented in the CMP.</p> <p>The noise assessment does not anticipate noise problems during operations. The Potts ESR points out that the Highways Agency guidance document Design Manual for Roads and Bridges, Volume 11, Section 3, Part 7 (DMRB) indicates that increases in traffic of 25% are required in order to generate an increase in traffic noise of 1 dB; this level of change might be audible if the change in traffic is sudden. For longer-term or gradual changes, a 3 dB change in traffic would be deemed to be audibly significant and this would require a doubling of traffic (100% increase).</p> <p>The TIS indicates that the only road link likely to experience an increase in traffic levels of greater than 25% was Triq il-Professur W Ganado; this road would experience development-related traffic increases of up to 60%, although the road is currently only being utilised at approximately 15% capacity.</p>	Noted.	/
40	280	Summary of Impacts 7	It is noted that the EPS states that the proposed measures to mitigate disturbance on susceptible fauna by site illumination during the night may still cause light pollution that may negatively influence wildlife, yet the significance of the impact and residual impact is considered as "probably low". Clarification for this evaluation is required.	As stated in Summary of Impacts 7 (page 280 of CAR-1), it should be emphasised that this impact already exists, as the environs of the proposed sites are popular entertainment areas and are presently illuminated during the night. Any additional illumination will modify the magnitude of the impact rather than the nature of the impact. As such, given that the environs have been subject to much artificial illumination for a considerable period of time, it is being assumed that any selective pressures arising from illumination would already have exerted an effect on the fauna of the area. As such, the fauna that remains in the area is either habituated to the impact or unaffected by it and any further illumination would not be expected to alter these limits of tolerance.	Noted.	/
41	284	4.1.7.1/C	The summary of impacts indicate that the impact significance on cultural heritage assets during construction is 'low to high' however fails to identify which features will be significantly impacted by the proposal. Therefore a separate summary of impacts should be provided for those cultural heritage assets which will have a potential medium and high impact from the proposal.	As is noted above the Samut Tagliaferro report has been revised and another report commissioned to ASC. This section has been revised accordingly in CAR-2	<p>Noted. Refer to response regarding comment 19.</p> <hr/> <p>EIA Coordinator's Response (13/08/2014) Agreed</p>	Noted.

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
42	284	4.1.7.1/C	The potential impacts of the proposal on cultural heritage should also assess impacts on the potential demolition of any assets, if any, and impacts on the visual and landscape character.	As is noted above the Samut Tagliaferro report has been revised and another report commissioned to ASC. This section has been revised accordingly in CAR-2	Noted. Refer to response in question 19. EIA Coordinator's Response (13/08/2014) Agreed	Noted.
43	300 - 302	4.1.9.25 to 4.1.9.28 Figures 4-34 - 4-35	The values in Table 4-40 determine that there will be an increase in NO2 emissions from Year 1 to Year 2 and Year 3. However from the figures (4-34, 4-35, 4-36) depicting NO2 dispersion greater than 28.00 microgram from Year 1 (figure 4-34) to Year 2 (figure 4-35) does not tally. This figure also does not concur with that indicated in the air quality study report.	The wrong images were inserted in the figures. The correct images are inserted in CAR-2.	Noted.	/
44	319-331	Summary of Impacts 1 - 13	The severity of the effect and scale of impact is not provided in the tables. Kindly provide justification.	Done in CAR-2	Noted.	/
45	345	5.1.2/L	The TORs state that the report should provide "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". However the EPS and the Cultural Heritage Assessment fail to provide specific details on the necessary monitoring being proposed as a mitigation measure. Details regarding cultural heritage monitoring need to be defined.	As is noted above the Samut Tagliaferro report has been revised and another report commissioned to ASC. This section has been revised accordingly in CAR-2	Noted. Refer to response in question 19. EIA Coordinator's Response (13/08/2014) Agreed	Noted.
46	339-348	Chapter 5	Regarding development at Cresta Quay, this will involve excavation directly adjacent to (if not into) the sea and potentially reclamation. Moreover, it will include the placing of a stone crusher within this area for two months. Hence a detailed description of proposed mitigation measures during the different stages of the project to abate any potential impacts on the marine environment during excavation and construction, particularly during the use of the crusher and due to generated dust is to be provided. This is without prejudice to whether placing the crusher in this area is acceptable or otherwise.	The re-development of Cresta Quay does not involve any land reclamation. Section 5.1.2 of the CAR-1 includes a framework for a detailed CMP, which is the document in which detailed mitigation measures are provided. This framework refers to the usual issues which are encountered in construction sites that is air quality, the quality of the aquatic environments, noise and vibration, waste management and so on. It also requires the CMP to provide information about the crusher which would be used (assuming that the MEPA approves the use of such machinery). It is possible for crushers to be equipped with dust suppression equipment.	Noted.	/

Non-Technical Summary

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) EIA coordinator responses (13/08/2014)	MEPA Responses (02/09/2014)
47	NTS	/	For ease of reference to the reviewer, the NTS should include at least one photomontage depicting the proposal.	Agreed. Will be done in CAR-2	Noted.	/
48	NTS - 9	4.4	Landscape and visual impacts envisaged from the proposal should be quantified as either adverse/neutral/beneficial, as indicated in earlier comments above.	As is noted in a previous response this is not possible.	Noted.	/

Environmental Survey Reports

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) Response (13/08/2014)	MEPA Responses (02/09/2014)
49	Ecology and Vertebrates Reports	General	Għar Ħarq Ħammiem cave is the only known locality for the staphylinid beetle <i>Sepedophilus marshami</i> . Furthermore, the cave entrance supports populations of the rare ant <i>Paratrechina longicornis</i> . These species are not taken into consideration in the EPS.	<p>The ant <i>Paratrechina longicornis</i> and the staphylinid beetle <i>Sepedophilus marshami</i> are both very small, relatively sessile and fossorial insects whose identification requires specialised knowledge and which were recorded from the cave and its entrance a very long time ago and have not been looked for since; therefore there is nothing known about their populations in the cave and its environs.</p> <p>Nonetheless, if the microenvironment at the cave entrance and in the cave itself are not impacted by the development (the only potential impacts from the development are due to runoff carrying pollutants from the development or collapse of the cave), then there is not likely to be any changes in their population due to project actions.</p>	Noted.	/
50			The cave also contains a large pool of fresh-water making it the largest subterranean freshwater habitat in the Maltese Islands. Assessment of the impact of the development on this important habitat and the ecology it supports needs to be appropriately addressed.	A detailed study of the cave was not deemed necessary since the development is not likely to impact the cave ecosystem <i>per se</i> unless through contamination of the cave by runoff carrying pollutants from the development or through causing collapse of the cave; the potential for impact of the development on the physical structure of the cave is an engineering matter and not in the competence of the ecological consultants.	<p>Whilst it is agreed that the potential of impact of the development on the physical structure of the cave is an engineering matter and does not fall within the competence of the ecological consultants, the impact of cave collapse on the ecology which the cave sustains should still be assessed, whilst taking into consideration the degree of significance given to this potential impact as provided by the EPS consultant on geology.</p> <p>Response (13/08/2014)</p> <p>Possible scenarios arising from cave collapse are as follows:</p> <ol style="list-style-type: none"> 1 Partial collapse of the roof without exposure to the open air environment. This has happened before as evidenced by the boulder falls littering the pool in the cave. Such collapses will add to these boulder falls but will not affect the ecology of the cave significantly. Obviously, the more rock falls from the roof, the greater the change of a total collapse with time. 2 Total collapse of the roof. This will result in a doline where the pool would be exposed to the open air. This will result in an elimination of the subterranean pool environment in what is now the shallow part of the cave; it will probably also eliminate the stratification of water of different salinities in the cave, with possible impact on the deeper parts of the submerged tunnel. In short there will be an irreversible collapse of the present ecosystem. <p>It should be noted that the above and other clarifications re the ecology aspect have been inserted in CAR-3 on pages 205 and 323.</p>	Noted on the understanding that as indicated by the Consultant that the collapse of the cave or of the roof is highly unlikely, the significance of the ecological impact is therefore considered as low.

No.	Page	Para	Comment (25/(13/2014))	Responses (22/07/2014)	MEPA Responses (28/07/2014) Response (13/08/2014)	MEPA Responses (02/09/2014)
51			This area is one of three locations for the very rare sub-endemic Southern Birthwort, <i>Aristolochia clusii</i> [RDB : E,Rest (Med+MI)]. This species is not taken into consideration on the EPS.	This species was not noted during the ecological survey.	<p>The presence of this species has been confirmed in the area.</p> <p>Assessment of impacts should not be restricted to the protected species noted during a survey carried out in one season but should be carried out on all protected species recorded in the area.</p> <p>Response (13/08/2014)</p> <p>Although the EIA consultants did not observe this species during the field surveys, MEPA responses indicated that the presence of the species was confirmed in the area. It is assumed, based on the known habitat preference and geophytic life form, that this species was noted from the sides of Wied Ħarq Ħammiem. As such, this species would be subject to the same impacts as the geophytes considered in the responses to comment 36 on page 7.</p> <p>It should be noted that the above and other clarifications re the ecology aspect have been inserted in CAR-3 on pages 205 and 323.</p>	Noted.
52			Also restricted in distribution in the Maltese Islands and found in the area are the Crested Dock, <i>Rumex cristatus</i> ; and the Mediterranean Buckthorn, <i>Rhamnus alaternus</i> ; both known from five or less localities in the wild. The Bay Laurel, <i>Laurus nobilis</i> [RDB: R, Rest(MI)] and the Wild Olive, <i>Olea europaea</i> var. <i>sylvestris</i> [RDB: Rest(MI)] with a restricted distribution in the Maltese Islands are also known from the area. Assessment of the impact on these species on a national scale should be carried out in the context of their restricted distribution.	<p>Populations of these species were noted from the bed of Wied Ħarq Ħammiem, and were, in general, upstream of the development sites. They are not expected to be affected by obliteration of habitat as they are situated away from the proposed footprint of development. The species populations in question are also unlikely to be affected significantly by runoff from the proposed sites, either during the construction phase or operational phase as they are situated upstream of the sites. The relatively small population of <i>Rumex cristatus</i> that was recorded in the valley may have been impacted by changes in the hydrology of the area in the recent past, as a consequence of developments upstream of Wied Ħarq Ħammiem and which were largely unrelated to Villa Rosa. An increase in hard-landscaping as well as physical changes, both in terms of design and density, of the urban fabric would have influenced both direction and volume/rate of flow of surface run-off waters within the immediate area.</p> <p>Infiltration of alien species into the valley bed is, of course, a potential threat but one that is already present due to infiltration of ornamental species from the surrounding gardens. Selection of non-invasive species for landscaping purposes should reduce the probability of this potential impact.</p>	Noted.	/

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) Response (13/08/2014)	MEPA Responses (02/09/2014)
53			Also reported from the area are the Hairy Plantain, <i>Plantago bellardi</i> [RDB : RR, Rest (MI)]; the very rare Cage Thistle, <i>Atractylis cancellata</i> [RDB : RR, Rest (Med+ MI)]; the endemic Maltese Dwarf Garlic, <i>Allium lojaconoi</i> [RDB : Endemic]; and a large population of the Sicilian Squill, <i>Oncostema sicula</i> [RDB : R, Rest (Med + MI)]. These species and their restricted distribution are not taken into consideration on the EPS.	These species were not noted during the ecological survey. Sicilian Squill was actively searched for but not located. At the time of survey, the leaves of <i>Oncostema sicula</i> and <i>Drimia maritima</i> were degraded and could not be distinguished. The desiccated inflorescences of <i>Oncostema</i> were actively searched for but not located.	<p>Assessment of impacts should not be restricted to the species noted during a survey carried out in one season.</p> <p><i>Oncostema sicula</i> foliage can easily be distinguished from <i>Drimia maritima</i> since <i>O. sicula</i> leaves are slightly toothed (unlike in <i>Drimia</i>) and can be identified by touch. <i>Plantago bellardi</i> is a very small annual which is easily overlooked due to its minute size. <i>Atractylis cancellata</i> is present in two locations which have been recently confirmed. <i>Allium lojaconoi</i> is in flower between May and June and was therefore not identifiable earlier on when the survey was carried out.</p> <p>Response (13/08/2014) All four species are likely to colonise the valley sides and would therefore be subject to the same pressures as the plants referred to in comment 36 on page 7. In other words, impacts will be the same as on other members of their functional group considered in the responses. In the case of annual species, with their inherently less-predictable dynamics, the effects arising from the proposed development may not be easily separated from other population fluctuations which would be a consequence of life-cycle strategy. It should be noted that the above and other clarifications re the ecology aspect have been inserted in CAR-3 on pages 205 and 323.</p>	Noted.
54	Cultural Heritage Assessment Pg. 44	3.4	The report states that "The proposed development will have a direct impact on the Villa Rosa grounds", and that "The proposed development might have an indirect impact on the remaining cultural heritage features." These statements do not adequately identify and assess the possible impacts. Moreover, the demolition of the Moynihan House (which is proposed for scheduling) cannot be classified as an indirect impact on the remaining cultural heritage features. The impacts of the proposed excavation works within the Villa Rosa gardens and abutting Villa Rosa, and works abutting the entrenchment need to be further investigated.	The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated	<p>Noted. Refer to response in question 19.</p> <p>Response (13/08/2014) Agreed</p>	Noted.
55	Cultural Heritage Assessment - Data Capture Cards	/	Villa Rosa card should also include the proposed scheduling of the gardens which are a very important and unique feature within the villa/garden relationship. All cards provided lack detail pertaining to the historical analysis.	The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated	<p>Noted. Refer to response in question 19.</p> <p>Response (13/08/2014) Agreed</p>	Noted.

No.	Page	Para	Comment (25/(13/2014)	Responses (22/07/2014)	MEPA Responses (28/07/2014) Response (13/08/2014)	MEPA Responses (02/09/2014)
56	Cultural Heritage Assessment - Monitoring Programme	/	The TOR requires the submission of a long-term monitoring programme of the impacts of the development on the cultural heritage assets and their setting. Although the report proposes archaeological monitoring and/or investigation these should focus more on the works (including excavation) abutting the Villa Rosa and the entrenchment (Cresta Quay development).	The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated	Noted. Refer to response in question 19. Response (13/08/2014) Agreed	Noted.

Consultees' Comments**Malta Resources Authority (Email dated 26th May 2014)**

Comments	Responses (22/07/2014)
I refer to paragraph 6.0 on page 40 regarding designated LPG bulk tanks used for commercial cooking. According to LN 249/2008 the developer needs to submit an application for an authorisation to operate the bulk storages of LPG which are considered as secondary storages.	Point taken
The application should be accompanied by a technical report drawn up by a competent person in LPG technology. The application carries a non refundable application fee of €50.00. The technical proposal will be vetted by MRA analysts and will then be in a position to issue a clearance for this proposal which would also be subject to the clearance by the CPD and MEPA.	Point taken

Environmental Health Directorate (Email dated 19th June 2014)

Comments	Responses (22/07/2014)
With reference to your e-mail dated 20th May 2014 regarding subject indicated in caption, please be informed that following review of the EPS submitted this Directorate would like to submit the following comments/recommendations regarding this proposed development:	
Applicant is recommended to adopt best practice methods together with good site practices and ensure compliance with Environmental Management Site Regulations during the demolition, excavation and construction phase and to implement all proposed mitigation measures so as to cause least nuisance and mitigate adverse air impacts (especially from dust dispersion and emissions from heavy vehicles), noise and vibration impacts on sensitive receptors in the Area of Influence and on the general public. Effective and continuous noise, vibration and dust control measures during all the phases of the construction works is of utmost importance to mitigate adverse impacts (which are likely to span the entire construction period expected to take approximately 5 years) on nearby receptors and to avoid nuisances and complaints.	Agreed with thanks
Hence the importance of drawing up and implementation of a Construction Management Plan to ensure adherence to proper site management practices to mitigate adverse construction impacts and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure compliance with appropriate legislation, implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.	Agreed with thanks
Adequate measures should be taken so as to prevent adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel and lubricants which are to be well managed and adequately stored.	Agreed with thanks
All necessary precautions and preventive measures are to be taken during the demolition, excavation and construction phase so as to prevent any adverse impacts which may result in deterioration of the bathing water quality of the official bathing sites in the area especially during the official bathing season which is between the third week of May to third week of October. At any time during the official bathing season, this Directorate will initiate immediate legal proceedings against responsible party in case of any adverse impacts which result in deterioration of the bathing water quality of official bathing sites and infringement of Reg. 18 (2) of L.N. 125 of 2008, Management of Bathing Water Quality Regulations, 2008.	Agreed with thanks
Moreover, during the operation phase, there should be no discharges into the bathing areas from any brine from reverse osmosis plants and from any cooling water.	Agreed with thanks
A waste management strategy should be adopted and strictly implemented so that all generated waste streams will be contained, separated and disposed of safely through the appropriate facilities and according to the necessary permits/licences. With regards to removal and disposal of any hazardous waste, adherence to regulatory codes and procedures and due diligence is important in view of any adverse impacts on sensitive receptors.	Agreed with thanks
Generated wastes, cleaning chemicals, etc from the proposed on-site temporary toilet facilities for on-site workers should be properly disposed of. Moreover all water for human consumption and personal use including that of any showers at said facilities is to be adequate and potable and preferably from the Water Utility Supply i.e. Water Services Corporation.	Agreed with thanks
Regarding traffic management and related problems, especially problems related to increased volume of heavy vehicles through residential areas and rerouting during construction phase, it is recommended that the Traffic Management Plan includes a monitoring system to ensure this plan is adhered to at all times. Warning and regulatory signs, including those aimed at pedestrians, should be clear, prominent and visible at all times to ensure safety. It is recommended that construction traffic follows established specific routes and adequate measures (such as covering of all trucks leaving site with proper tarpaulin sheets) are taken to mitigate adverse dust impacts and nuisances from HGVs during transportation of construction material.	Agreed with thanks
It is also pertinent that storm water runoff be carefully managed and properly channelled and that adequate measures are taken to ensure that no water used from water dousing regimes, from wheel wash facilities and any general cleaning runs off the site.	Agreed with thanks
Reservoir-harvested rain water proposed to be collected/ stored in same should not be used for human consumption and/or personal use.	Agreed with thanks
Piping for second class water is to be properly marked as second class water and preferably this should be colour coded.	Agreed with thanks
The proposed ventilation of underground car parking areas should be implemented to prevent build-up of emissions during operational phase.	Agreed with thanks

Comments	Responses (22/07/2014)
Pest control management on site and at the surrounding areas especially regarding rodents which could be an issue during the demolition, excavation and construction phase should also be taken into consideration.	Agreed with thanks
Preliminary discussions have already been carried out with the Environmental Health Directorate regarding the proposed restaurants/food premises, public swimming pool and water features and the conditions in letter dated 15th April 2014 (copy attached) are to be adhered to.	Agreed with thanks
It is recommended that all proposed mitigation measures regarding adverse impacts arising from this development be strictly implemented by applicant to mitigate significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and the general public in view that the development is located in a predominantly tourist, recreational (including marine recreational), commercial and residential area. The possible health effects of any residual impacts that cannot be mitigated should also be taken into consideration. Moreover any other unpredicted impacts and nuisances which may arise from this development and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken.	Agreed with thanks
Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.	Agreed with thanks

Superintendance of Cultural Heritage (Email dated 20th June 2014)

Comments	Responses (22/07/2014)
<p>We refer to your Letter of Consultation dated 20 May 2014 and the Environmental Planning Statement received from the developer.</p>	<p>The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated</p>
<p>Proposed development The application proposes: (1) The demolition of St George's Bay Hotel (TRK 148158) (2) The construction of a multi ownership holiday accommodation, commercial area, offices, villas and parking (TRK 148158) (3) The demolition of existing structures at Cresta Quay (TRK 151497) (4) The construction of a hotel with ancillary facilities below the existing pavement level at Cresta Quay (TRK 151497) (5) The demolition of Dolphin House and the adjacent corner property (TRK148196) (6) The construction of a commercial block including semi-basement parking, Class 6 and Class 5 uses, and a language school (TRK148196)</p>	<p>The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated</p>
<p>Heritage Assessment The proposed development is within a Development Zone. The scheduled properties within or adjacent to the proposed area of development outlined in EA00016/13 include: (1) Villa Rosa – scheduled Grade 1 building (2) The St Julian's Entrenchment – scheduled Grade 2 military structure (3) The Harq Hammiem Cave – scheduled Level 1 geological feature (4) Moynihan House – scheduled Grade 2 The site where the proposed development is situated is both historically and archaeologically sensitive. In Wied Harq Hammiem, just adjacent to the proposed development are cart ruts (scheduled at Grade B), rubble walls (scheduled at Grade 2) and other scheduled vernacular structures and pathways. There is a risk that development in this area may uncover cultural heritage features that could hinder the execution of the proposed development.</p>	<p>The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated</p>
<p>Assessment of the EPS 1. The Cultural Heritage Assessment within the submitted EPS only includes the area covered by TRK 148158. It fails to cover the areas for TRK 151497 and TRK148196. 2. The Superintendance also notes that the field-walking survey required for the Cultural Heritage Assessment was not carried out since at the time of the study the vegetation was too dense. 3. The Coordinated Assessment (Volume One): Technical Report does not outline and quantify the impacts on all cultural heritage remains, nor does it suggest clear mitigation measures for each cultural heritage feature.</p>	<p>The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated</p>
<p>Recommendations 1. The Superintendance considers the EPS to be incomplete and recommends that the Cultural Heritage Assessment is re-submitted with the impacts of TRK151497 and TRK148196. 2. The field-walking survey is attempted during the coming weeks since vegetation becomes less dense in the summer months. 3. The impacts resulting from the three development projects (TRK 148158, TRK 151497, TRK 148196) are to be clearly outlined and quantified in the Coordinated Assessment. In this document clear mitigation measures are to be discussed for each of the cultural heritage features mentioned in the updated Cultural Heritage Assessment. 4. The scheduled features of cultural heritage value are not to be damaged in any way in line with existing policies.</p>	<p>The Samut Tagliaferro report has been revised and another report commissioned to ASC The corresponding Appendix has been updated</p>

Žminijetna – Voice of the Left (Email dated 5th June 2014)

Comments	Responses (22/07/2014)
We recommend MEPA to give utmost importance to public access to the beach, the problem of overdevelopment in the area, traffic impact assessment, energy efficiency and renewable energy, protection of the Valley -Wied Harq Hamieq (classified as Level 1 special protection area), protection of the area classified as valley extent and buffer zone (classified as ecological area) and the protection of the lower and upper garden in Villa Rosa. The development should have a full Environment Impact Assessment, Social Impact Assessment and Traffic Impact Assessment.	Points taken