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Malta

To whom it may concern

Environment and Resources Authority
Hexagon House,
Spencer Hill,
Marsa MRS 1441

10th September 2020

RE: AADT for PA 3927/19 -Proposed alterations and construction of a water polo and swimming pool, deck area, changing rooms, toilets, showers, committee meeting room and ancillary facilities at San Giljan Aquatic Sports Club, Triq Gorg Borg Olivier, San Giljan

Dear Sir/Madam

Please find the workings and assumptions to determine the Annual Average Daily Traffic (AADT) based on the current traffic flows, forecasted flows and trip generation statistics, which takes into consideration previous studies carried out in the area.

The proposed development involves the extension of the existing lido. All interventions are detailed in the Project Description Statement.

The area is highly commercialised and economic activities are focused around the tourist industry. There are a large number of hotels, bars and restaurants which cater for both tourists and locals alike. The bars and nightclubs are particularly densely packed within the Paceville area. A long promenade, extending the entire length of the San Ġiljan (St

Julian's) coastline, also attracts large numbers of people who enjoy walking, cycling and running. The promenade is especially busy during the summer months when people enjoy leisurely evening walks once the temperatures have fallen. St Julian's is one of the most developed and visited localities in Malta. Sunbathing, diving, water sports and swimming in St. Julian's, is also very popular, particularly in the bays of Spinola and Balluta, which contribute to the locality's appeal.

The proposal located on the coast between Balluta and Spinola Bays is currently occupied by the existing San Ġiljan Aquatic Sports Club, bar and restaurant. The sports club facilities are currently composed of two shower rooms, small storage rooms and an additional room which is being used by a dive centre operator. The sports club facilities, bar and restaurant are only operational during the summer months; during which a temporary water polo pitch is installed in the sea.

A kiosk with surrounding outdoor terrace is located above the sports club at the promenade level. The site is surrounded by a mixture of commercial and residential property.

The proposed development incorporates the refurbishment and extension of the San Ġiljan Aquatic Sports Club. The project also involves the construction of two saltwater swimming pools with ancillary facilities including a gym/weights room, changing rooms and toilets. In order to accommodate the two pools, an area of 3,388m² will need to be reclaimed. A specifically designed seawall has been included to protect the development from waves.

A large deck that will serve as a lido for the general public will be constructed next to the pools. The development also includes a restaurant and a sufficient footprint to accommodate the diving school operator. The promenade will also be upgraded into a public plaza, whilst the existing kiosk will not be modified. Access to the shoreline will remain unobstructed along the entire length of the site boundary.

The proposed development aims to improve the existing sports club facilities by building a permanent pool structure, which will enable water polo matches to take place during adverse weather conditions, particularly when the sea is rough. The current facilities are not sufficiently equipped to cater for such scenarios.

The project seeks to embellish and enlarge the promenade providing a more enjoyable space for people strolling along the coastline.

The proposed lido extension, which measures 800m², will not attract any new vehicular traffic as most of the patrons are locals. This is further reinforced by the fact that the hotels along Triq Borg Olivier have few facilities and therefore the proposed lido will offer an opportunity for all those tourists residing in the locality.

The lido has a very seasonal trip generation, dropping dramatically (some also close) during the colder months (8 months a year) and hence any perceived impact would be so heavily diluted that it would still be insignificant for the purposes of AADT which considers the whole twelve months.

This seasonal aspect is commonly observed in coastal areas in Mellieħa whose sandy beaches (along what may be considered recreational roads not an urban context) and route to Gozo attract almost 40%-60% more traffic in summer than the AADT, particularly during week-ends. In most cases, however, historical factors computed over a number of years provide a better indication of seasonality over time. This is not necessary in this case.

Any vehicular traffic related to the existing lido, has been included in the baseline, as check counts for the abovementioned redevelopment proposals, had been carried out in the summer months.

To better understand the context and the development characteristics that are being considered in this case, the reader must keep in mind, that the lido primarily serves the people from the locality and neighbouring Sliema.

As proposed, the upgrade lido, given the context, the location, the fact that it is within a popular promenade within an urban coastal region, we strongly believe that interventions would not have any perceived adverse impact in terms of vehicular traffic to and from the.

Given the 'gravitational pull' of Sliema/St.Julian's peninsula as a national/regional centre for retail, commerce, entertainment and employment, it is ***highly likely*** that trips generated by the development are already on the neighbouring road network. These non-primary trips will

therefore not load the junctions and links, in real terms, over and above the existing flows. Nor would they result in additional emissions over and above the baseline values.

The site is accessible by all modes of transport, including public transport through Triq Gorg Borg Olivier and many routes pass through the area making public transport convenient and a tangible alternative to car use. A significant number of people walk along the promenade, and public transport in the area enjoys amongst the highest national patronage.

With reference to the information above, contextual realities, traffic counts and historic traffic data it is assumed that currently Triq Gorg Borg Olivier has an AADT of about 21,100 (factored from peak hour and based on historic data collected by the author). For 2020, the peak flows in proximity of the proposed upgraded lido area (Triq Gorg Borg Olivier) as follows:

- **AM Weekday Peak: 1,100 vehicle per hour (vph)**
- **PM Weekday Peak: 1,150 vph**
- **AM Weekend Peak: 1,3450 vph**

As a result of the development, considering the context, high concentration of tourist development, pedestrians in the area, limited parking opportunities and vehicular traffic along Triq Borg Olivier, it is highly unlikely that there will be any significant primary trips to the development site. The area will experience NO increase in vehicular traffic which is new to the area as a result of the extension.

No increase to AADT will be experienced.

In the worst-case scenario, if one considers 20% primary trips this would translate in less than 100 vehicles during the peak periods.

Considering the pressure that the Sliema, Gżira, St. Julian's peninsula is experiencing compared to other parts of the island, it is fair to assume that much more people will walk, use public transport and find alternatives to the car travel given the proximity to their place of work, study and other amenities.

Please do not hesitate to contact the undersigned should you require any further information or clarifications on the above.

Regards,

A handwritten signature in black ink, appearing to read "Bjorn Bonello". The signature is written in a cursive, fluid style with some loops and flourishes.

Bjorn Bonello

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