

Environmental Impact Assessment

Screening according to Schedule III of S.L. 549.46

ERA Reference no.:	EA 00009/20
PA Reference no.:	PA 03927/19
Project Title:	Proposed alterations and construction of a water polo and swimming pool, deck area, changing rooms, toilets, showers, committee meeting room and ancillary facilities
Location:	Site at San Giljan Aquatic Sports Club, Triq Gorg Borg Olivier, San Giljan
Screening date:	January 2021

I. BACKGROUND

1. Outline of Proposal

- 1.1 The proposed development is for the refurbishment and extension of the San Ġiljan Aquatic Sports Club located on the coast between Balluta Bay and Spinola Bay. As part of this proposal, the jetty will be used as an embarking/disembarking point for the local inter-harbour ferry service. Refer to **Figure 1** and **2**.
- 1.2 The proposal involves the construction of (refer to **Figure 3**):
 - Two saltwater swimming pools;
 - Ancillary facilities including two kitchens, store room, pump room, gym/weights room, changing rooms and toilets;
 - A lido for the general public, including large deck, lounge, restaurant and diving centre;
 - A seawall as a protection against waves; and
 - A jetty which will be used as an embarking/disembarking point for the local inter-harbour ferry service.
- 1.3 The PDS states that the bullhead shape of the proposed tip of the jetty has been specifically included within the design to provide protection for the vessels berthed along the quay.
- 1.4 The area to be reclaimed on the seabed according to the PDS is circa. 3,388 sq.m.
- 1.5 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.

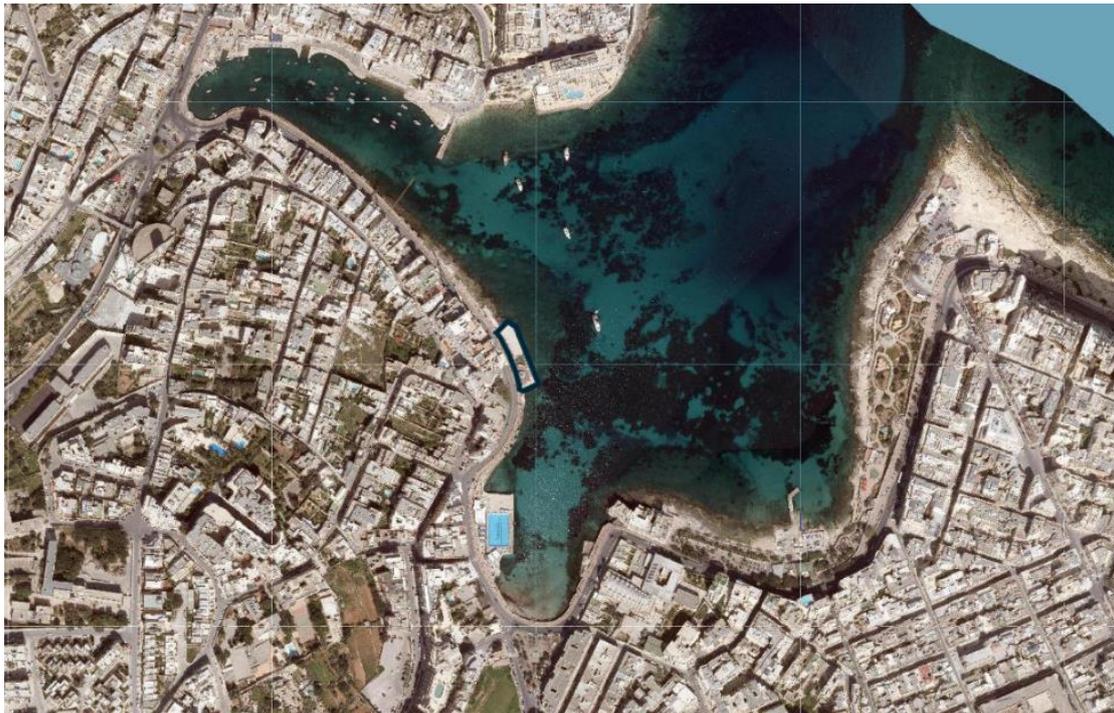


Figure 1: Aerial ortho-photo (2016) showing the location of the site (Source: PA Geoserver).



Figure 2: Aerial ortho-photo showing the location of the site and 100m buffer zone (Source: PDS).

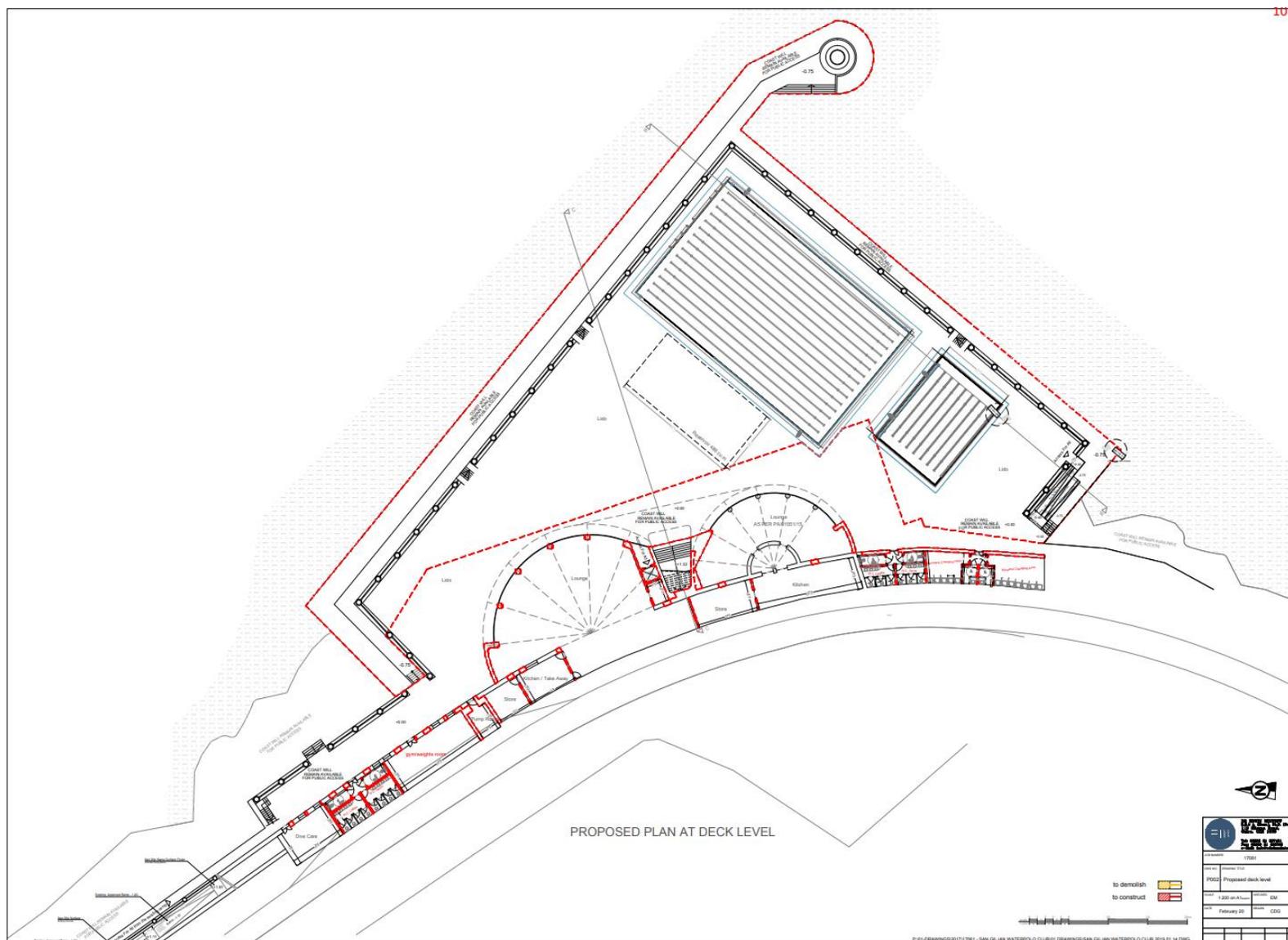


Figure 3: Proposed plan at deck level (Source: *E-apps PA/03927/19/107b*).

2. Site context

- 2.1 The site falls under the administration of San Giljan Local Council and under the designation of the North Harbour Local Plan (NHLP). The area is designated as a 'Coastal Area with Leisure Uses' under NHRL03, as indicated in Map SJ2.
- 2.2 The coastal water body in which the proposal lies is MTC104. The marine habitat is described as 'Fine sediment with patches of the priority habitat species *Posidonia oceanica* and *Cymodocea nodosa*'.
- 2.3 A promenade extends along the whole length of the coastline. The coastline to the south of the site is artificial, whereas the coastline to the north is a combination of both natural rock and artificial concrete platform. This coastal stretch is a very popular spot for swimmers and sunbathers during the bathing season.
- 2.4 To the south west of the site lies a distinct Waterpolo and Swimming Club.
- 2.5 A mixture of residential and commercial land uses are situated to the west of the site. Adjacent to the site, on the opposite side of Triq George Borg Olivier, lies a small landscaped area and a carpark.
- 2.6 The cultural heritage buildings located in the vicinity of the site, scheduled as Grade 2 under G.N. 576/94 is provided below:
 - Villa Leoni, Triq il-Kbira;
 - Casa Caruana Dingli, Triq il-Kbira;
 - Chateau en Mer, Triq il-Kbira.
- 2.7 Whilst the above scheduled buildings are in the vicinity of the site, the Seawall and Stairs in Triq il-Kbira, lying within the proposed development's footprint, is also scheduled as Grade 2 under G.N. 576/94.

3. Site history

- 3.1 This site has been previously subject to the following Enforcement Notice and Planning Applications:
 - EC/00263/93; Canopy without permit – Enforcement Action Closed.
 - PA/01049/93; To carry out additions and alterations - Refused.
 - PA/03825/95; To construct a pool – Withdrawn.
 - PA/00721/02; Development of waterpolo pitch – Withdrawn.
 - PA/01781/01; To remove existing sign and replace it with a new sign in a new position – Refused.
 - PA/03657/01; Demolition and reconstruction of St. Julian`s Waterpolo pitch club and the upgrading of the overlying promenade – Approved.
 - PA/01066/03; To install a fully retractable canvas canopy, externally illuminated signs and three vending machines - The request for reconsideration has been granted overturning the original decision.
 - PA/00193/06; Proposed placement of 'U' shaped adverts - The request for reconsideration has been granted overturning the original decision.
 - PA/06074/08; Installation of temporary wind barriers (winter season only) around kiosk – Approved.

- PA/01051/15; To sanction alterations, table and chairs, lido and lounge areas at deck level. To carry out internal minor alterations. To install a fully retractable canvas canopy around an existing kiosk at promenade level – Approved.
 - PA/04053/19; Proposal to install removable glass around the kiosk – Approved.
- 3.2 Earlier this year, PA/07628/19 for St. Julian's landing place proposal as part of a new venture consisting of a sea based hop-on hop-off maritime service was approved on 2nd March 2020. PA/07628/19 is situated southwest to the proposal and will serve as a temporary site until the incorporation of a ferry landing site will provide a permanent embarking/disembarking point.

4. Screening Criteria

4.1 EIA Screening

The proposed development falls under the scope of the below Schedule I Category II Sections of the EIA Regulations (S.L. 549.46):

- a) 6.2.2.1 (*Reclamation of land from the sea, or other development in the sea affecting the seabed*);
- b) 6.2.2.3 (*Coastal works to combat erosion, and works capable of altering the coast [through the construction of, for example, breakwaters, dykes, moles, jetties, groynes, sea-walls, wave-breakers, underwater berms, and other sea defence works] not covered by Category I, excluding the maintenance and repair of such works*);
- c) 6.3.2.3 (*Development on the coast or in the sea, not covered by Category I, with a footprint of 500m² or more*).

5. Documents used for screening

- i. Revised Project Description Statement (PDS) referred directly to ERA on 18th January 2021;
- ii. AADT report which was referred to ERA on 27th November 2020;
- iii. North Harbour Local Plan, 2006 (NHLP);
- iv. Plans available to ERA for viewing on PA E-Apps at Docs 102a-e & 107b.

II. ASSESSMENT OF PROPOSAL

6. Assessment of Impacts and Ancillary Considerations

(*Screening in terms of Schedule III of the EIA Regulations, S.L. 549.46*)

Land and Sea Use

- 6.1 Impacts on land use are not envisaged to be significant in view that the proposal is for the construction of a waterpolo pitch which will extend seaward from the coastline. However consequently, the proposal will reduce the area of sea use, which is viewed as an adverse impact.

- 6.2 Whilst the intention of the ferry service is to alleviate road traffic it will contribute to marine traffic. In this regard, further assessment is required to determine the implications the ferry service has on the environment.

Marine Ecology

- 6.3 Whilst, no protected terrestrial ecological species/habitats lie within the site and in its vicinity, *Posidonia oceanica*, which is a conservation priority habitat listed under Annex I of the Habitats Directive transposed in national legislation through the Flora, Fauna and Natural Habitats Protection Regulations (S.L. 549.44), is present in the proposal's footprint as well as in the vicinity of the development site as observed via satellite imagery. The likely loss of *Posidonia oceanica* is of concern.
- 6.4 The physical loss of marine seabed habitats due to land reclamation, which may result in deterioration of the environmental status as defined by relevant EU policy is envisaged as a major adverse impact. This may be intensified by the operations of the ferry service.

Wave Hydrodynamics

- 6.5 The altered hydrodynamics and associated physicochemical parameters especially due to the alteration of the coastal morphology, effects on wave and current patterns in the surrounding marine area of influence, cumulation of developments, and increased activity within the bay.
- 6.6 The proposal is likely to lead to significant changes to the coastline due to the extension of the coast as well as the extension and construction of a sea defence wall. In this regard, hydrographical changes that would deteriorate the water quality and ecological status of The EU Water Framework Directive - 2000/60/EC (transposed in national legislation through the Water Policy Framework Regulations [S.L. 549.100]) coastal water body are likely.
- 6.7 Additionally, consideration must be given to the limited water circulation within the bay area noting the physical configuration of the coastline and existing physical modifications that have been carried out to-date.
- 6.8 Other impacts may arise such as increased erosion/wave damage and/or increased turbidity due to sediment resuspension caused by potential changes in wave reflection patterns and also possibly by the operations of the ferry service.

Geo-Environment

- 6.9 Whilst no changes in the hydrology and the hydrogeology of the site as a result of the proposed development are envisaged (PDS also states that surface water and storm water will be channelled towards an onsite reservoir), the reclamation of land and the piling works will alter the coastal geomorphology of the area. ERA agrees with the PDS, in its evaluation of geo-environment impacts as minor adverse.



Waste

- 6.10 During construction, the proposal is expected to generate approximately 1400 cb.m of reinforced concrete, rock and building materials. In this regard, adverse impacts are envisaged during the construction phase in relation to the excavation and transport of waste.
- 6.11 It is not clear whether the material to be dredged is hazardous or otherwise, therefore the impact is uncertain. In this regard, sampling plans for the management and disposal of dredged material; and chemical analysis of possibly hazardous material are required.
- 6.12 Overall, the impacts related to waste generation are envisaged to be moderate adverse as also reported in the PDS.

Resource Use

- 6.13 The estimated raw materials required for the construction of the proposal, as stated in the PDS are approx. 31,000 cb.m of reinforced concrete and 3,000 cb.m of hollow concrete brick (HCB) walls.

Construction Phase Impacts

- 6.14 Users of the adjacent promenade, nearby commercial outlets as well as the residents of the area will be affected negatively during the construction phase due to disturbances and inconveniences. Similarly, during the construction phase particularly the land reclamation work, boat and beach users of the marine area may be negatively affected. The access along the coastline will also be temporarily restricted. Such impacts are however temporary.
- 6.15 Dust emissions during construction will be generated and are likely to have a temporary impact on the air quality in terms of nuisance to the users/residents of the area.
- 6.16 Impacts emanating from waterborne dust and sediment plumes generated during construction are considered unfavourable including but not limited to an environmental point of view. In this regard, sufficient mitigation measures are to be implemented such as use of silt curtains.

Air Quality, Noise and Vibration

- 6.17 The submitted AADT report concluded that 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. It is therefore being envisaged that the area will experience no increase in vehicular traffic which is new to the area as a result of the extension, hence no increase to the circa. 21,100 existing AADT will be experienced.
- 6.18 Similarly from a noise and vibrations perspective, given the site is located in a busy area the additional traffic and operation noise is not envisaged to be significant relevant to the existing baseline.
- 6.19 The use of alternative modes of transport such as the proposed ferry service is perceived beneficial as this will aid in alleviating the national traffic problem and

correlated poor air quality by contributing towards improving the situation in a predominantly congested area.

Cultural Heritage

- 6.20 The Seawall and Stairs in Triq il-Kbira scheduled as Grade 2 under G.N. 576/94, lie within the proposed development's footprint and so will be directly impacted by the proposed development. This is considered an adverse impact.
- 6.21 In view that it is unknown whether any artefacts or cultural assets are concealed in the footprint of the development site, further assessment is required. It is recommended that consultation with the Superintendence of Cultural Heritage (SCH) is carried out.

Visual Impact

- 6.22 The construction of the extension and sea defence wall will further exacerbate the adverse visual impacts of the area. In this regard, further assessment is required in terms of coastal landscape and visual amenity.

Screening Outcome

In light of the above, the proposed development requires an EIA as per Schedule I, Category II, 6.2.2.1, 6.2.2.3 and 6.3.2.3 of the EIA Regulations (S.L. 549.46). The EIA should address the following environmental issues:

- a) *Sea-use;*
- b) *Marine Ecology;*
- c) *Wave Hydrodynamics (in line with Article 4(7) of the WFD);*
- d) *Waste Management;*
- e) *Cultural heritage; and*
- f) *Visual amenity.*

III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

The applicant has been informed accordingly and further processing of the planning application should await the outcome of the EIA.

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.