

**ERA Ref.:** EA/00009/20

**Description Proposal:** Proposed alterations and construction of a water polo and swimming pool, deck area, changing rooms, toilets, showers, committee meeting room and ancillary facilities

**Location:** San Giljan Aquatic Sports Club, Triq Gorg Borg Olivier, San Giljan

**Subject:** Table with recommendations and ancillary reasoned justifications provided by the public, government entities, E-NGOs and relevant local councils, during 30-day public consultation on Terms of Reference, on any matters that they wish to see included in the EIA terms of reference.

**Consultation period:** 09 February 2021 – 11 March 2021

No.:	From	Comments
1	Moviment Graffitti (emails dated 09/02/2021)	<p><i>[First email]</i></p> <p>The following is the information that we would like to see included in the Terms of Reference (TORs) for the EIA,</p> <p>1. An <b>assessment of alternatives</b> which would include a proper analysis of the different possible permutations of the development. Although it is being touted as an all-year round sports facility, it is very clear that this is in effect a ferry landing place for the ISeeMalta touristic ferry service, with an overwhelmingly large pool deck and a puddle of a pool to justify the development and to make the ruin of a swimming bay politically justifiable. The same thing is happening all round the island, with government entities suddenly finding a newly-found affinity for waterpolo - which affinity coincidentally necessitates pouring concrete in bays, turning them into huge decks for catering facilities and brutalizing the coast - sadly with no proportionate improvement to the sport as played by Maltese youths. Suffice to say that prior to the Covid-19 pandemic nearly all waterpolo teams employed foreign star players paying them exorbitant salaries, with the resultant effect that the waterpolo clubs' budget was sucked up for this purpose and there was little budget which could be spent on other sectors of the game. National team results are very dismal. So now we have these huge private (the ferries and the catering element) projects subsidised with public tax payer money under the guise of promoting sports. As usual, in Malta, it is the case of the tail wagging the dog. In the mean time, the rest of us look on helplessly as whole swathes of coast line and now - even the sea - are hogged for purely commercial private ventures - fluffed with the usual greenwash as to alternative transport and the ever popular social mollifier of sport.</p> <p><b>Studies should include:</b></p> <ul style="list-style-type: none"> <li>- Information as to different alternative berthing places for the ferry and why they have been dismissed</li> <li>- Information as to the precise route of the ferry and how its operations will impact the activities of other users such as swimmers, divers, kayakers,</li> <li>- Information as to different configurations and dimensions of the deck area and why such options were discarded</li> <li>- Information as to whether the waterpolo pitch will be a fresh water pool and whether it will be heated and covered - and whether the costs of such a venture have been factored into the proposal</li> <li>- Information as to the number of persons who are envisaged to be interested in playing waterpolo and using the waterpolo pitch for sports (and not for frequenting the restaurant)</li> </ul>

		<ul style="list-style-type: none"> <li>- Independent and verifiable studies as to the predicted number of ferry users - and how and <b>why this number depends on this specific site</b> - and not another site where it would disturb less swimmers, studies as to the effect on traffic by the CAR-using elements of the scheme -how is this going to be accomodated on a main road with little or no parking provision and a locality suffering because of parking problems? Or is the public open space opposite the San Giljan WaterPolo Pitch ear marked for a car park for this purpose?</li> <li>- How the increased dimensions of the deck and the movement of the ferry will impact both on the dimensions and position of swimming zones designated by Transport Malta and the areas of the Bathing Zones (two different concepts). It would be useful to calculate what percentage of free publicly available open space, coast and sea there is - as opposed to private and commercial establishments and lidos in the North Harbour Area.</li> <li>- A study of the impact of the wave motion and hydrodynamics as impacted by the Scheme</li> <li>- A study of the impact of sediment suspension and the effect of the scheme on habitats and species in the whole area (both that to be taken over by the pool and deck as well as the whole operational route of the ferry) including - but not limited to - protected species and habitats such as Posidonia Oceanica.</li> <li>- A study as to the landscape and visual amenity of the area with the inclusion of all scheduled monuments/sites and buildings and including the impact of the garish red ferry vessels themselves</li> <li>- Studies as to how the noise emanating from the scheme will impact residents and persons in the area. Please do not refer to any possibility of enforcement. The real experience of residents in Sliema with other beach side lidos shows that enforcement is inexistent.</li> <li>- Studies as to the composition and destination of the seabed waste excavated.</li> </ul> <p>All the above should be carried out by experts in the respective fields who have no links to the applicant or to the ferry operators - and who aren't their "go-to" consultants - ever-ready to whip up yet another justification for environmentally and socially detrimental projects.</p> <p>The inclusion or omission of these studies should be commented upon by ERA - at least to make us feel that we are not whistling in the wind - commenting on another fait accomplit development.</p> <p><i>[Second email]</i></p> <p>Further and in addition to my earlier email as to the information that we would like to see included in the Terms of Reference (TORs) for the EIA, we would like to add that there should be studies about the present bathing water quality of the whole bay (St Julians and Balluta) as well as the other bathing zones which are on the ferry route and which will be affected.</p> <p>Studies as regards the impact on bathers' safety should also be carried out</p>
2	Civil Protection Department (email dated 09/02/2021)	<p>The CPD recommend the submitting of the Fire Safety report addressing the measures and provisions shall compliment the <i>Design guidelines on fire safety for buildings in Malta</i>, CPD approved standards and the Laws and Regulations of Malta.</p> <p>All hazardous material and MSDSs at the premises shall be brought to the attention of the Civil Protection Department prior operation permit issued. All Hazmat MSDSs shall also be on location at all times and made available for the emergency services.</p>

3	Member of the public (email dated 15/02/2021)	<p>Thanks for this opportunity. I have only one concern. Bathrooms and showers and changing rooms. Since we are getting more information regarding the LGBTIQ, I really wish that same remains with Genders rest rooms those of females and those of men. However, I propose that another kind or rest room is done for non-binary people as well.</p> <p>I don't think it is nice planning one kind of rest room for all. Women has particular needs, males same and also non-binary people. So I hope these are planned and separated from one another. Also I suggest that rooms have ample space for all physical needs, I mean if I need to come in with the wheelchair, I can do it comfortably. Same room can be used by a person of the same gender without a wheelchair. We all have different abilities.</p>
4	Superintendence of Cultural Heritage (email dated 24/02/2021)	<p><b>Ref. Cultural Heritage Act 2019 (CAP 445)</b>  <b>PA/03927/19 – San Giljan Aquatic Sports Club, Triq Gorg Borg Olivier, San Giljan</b></p> <p><b>1.0 Preamble</b>  The site in question lies within the Development Zone, 50 meters to the east of the Urban Conservation Area of St. Julians.</p> <p>The proposed project would involve development over an extensive area and may lead to intensification of activity over a larger area. Potential impacts may occur within the footprint of the project, in the immediate environs, and along access routes to the site. Potential impacts may include direct and immediate material impacts, as well as subsequent impacts that might arise from the modification of the existing situation.</p> <p><b>2.0 Scope and Definitions of the EIA</b>  For the purposes of this document, cultural heritage is defined by Article 2 of the Cultural Heritage Act (2019). This includes movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, palaeontological and geological importance.</p> <p>2.1 The study area shall include the total footprint of the proposed development.  2.2 In the context of this particular application, cultural heritage considerations consist of:</p> <ul style="list-style-type: none"> <li>• Historic seawall and stairs, scheduled at Grade 2 by the Planning Authority (GN.576.94)</li> <li>• Geological rocky formations, recorded at 20 meters to the north west of the site’s footprint</li> </ul> <p>The above cultural heritage definitions and considerations are not to be considered as exclusive. The EIA must consider all other forms of cultural heritage, both known and unknown.</p> <p>2.3 The Environmental Impact assessment will: -  Describe the Cultural Heritage assets within the study area;</p> <ul style="list-style-type: none"> <li>• Analyse the cultural heritage features within the context of the cultural landscape;</li> <li>• Assess the physical, spatial and visual impacts of the proposed development on the cultural heritage assets;</li> </ul>

		<ul style="list-style-type: none"> <li>Propose corrective measures for the protection of the cultural resources.</li> </ul> <p><b>3.0 Methodology</b></p> <p>In quantifying the cultural heritage assets within the study area, and assessing the impacts of the proposed development, the EIA will undertake:</p> <ul style="list-style-type: none"> <li>Description and assessment of the property;</li> <li>Desktop and archival research limited to the study area;</li> <li>Fieldwork and research, including “field walking”, topographic survey and remote sensing as may be necessary within the site. All fieldwork has to be authorised by the Superintendence of Cultural Heritage as defined below under point 4;</li> <li>Consultations with any relevant bodies, including the Superintendence of Cultural Heritage, Heritage Malta, the University of Malta, NGOs and Local Councils;</li> <li>Compilation of an inventory of the cultural heritage assets identified within the study area. The features of cultural heritage are to be described and plotted with grid references, on Data Capture Sheets, the design of which should be approved in advance by the Superintendence of Cultural Heritage. The Data Capture Sheets will be presented as an appendix to the EIS. The analysis of the features will be included in the main report;</li> <li>A cultural heritage Risk Assessment Map examining the various impacts of the proposed project is to be included in the EIA.</li> </ul> <p><b>4.0 Authorisation by the Superintendence of Cultural Heritage</b></p> <p>As per Cultural Heritage Act 2019, any form of investigation or prospection required for the identification of cultural heritage (including excavation, field walking, topographic survey and remote sensing) may only be undertaken by the Superintendence of Cultural Heritage or with its written approval.</p>
5	Din I-Art Helwa (email dated 05/03/2021)	<p>It is being requested that the below listed studies and assessments be included to form part of the Terms of Reference.</p> <ul style="list-style-type: none"> <li>Assessment of alternatives which alternative should be comprehensive and provide a clear understanding of the environmental impact of each, and allow for adequate informed comparative analysis with impacts of proposed scheme.</li> </ul> <p>The alternatives considered should include, but not be limited to, modifications of the scheme such as;</p> <ul style="list-style-type: none"> <li>removal of breakwater,</li> <li>removal of 'ancillary' facilities, gym</li> <li>alternative sites,</li> <li>reconfiguration of proposal</li> <li>zero option</li> <li>or combination of the above</li> </ul> <p>EIA to also include;</p> <ul style="list-style-type: none"> <li>A study of the impact of the wave motion and hydrodynamics as impacted by the Scheme</li> <li>A study of the impact of sediment suspension and the effect of the scheme on habitats and species in the whole area including - but not limited to - protected species and habitats such as Posidonia Oceanica.</li> <li>A study as to the landscape and visual amenity of the area</li> <li>A Noise Impact Assessment</li> </ul>

		<p>- A Social Impact Assessment</p> <p>- A Traffic Impact Assessment</p>
6	<p>Member of the public (email dated 09/03/2021)</p>	<p>Please find attached my submission to the terms of reference.</p> <p>Would also like to put in my interest for any public meeting or consultations on this EA and also be present for any public meetings related to this EA.</p> <p>As a user of the bay together with many Maltese families would like that ERA do an in depth study so that a realistic informed decision is taken on the future of this bay, keeping in mind existing uses and those that are being proposed in this application.</p> <p>The proposal should also be seen in its context both in terms of size, use, visual impact, safety and health of the public..</p>
7	<p>The Energy and Water Agency (email dated 11/03/2021)</p>	<p>Reference is made to EA Consultation – Variation Application for PA 03927/19 San Giljan Aquatic Sports Club and Ferry Landing.</p> <p>The following are comments from The Energy and Water Agency divided by considerations which relate to specifically to energy management.</p> <p>Energy:</p> <ul style="list-style-type: none"> <li>• With reference to Section 7.1.1 of the PDS, for the heating of both pools it is strongly suggested that technology such as heat pump water heaters be looked into for this process.</li> </ul>