

Ministry for Transport,
Infrastructure and
Public Works

2nd December 2025

National Transport Master Plan 2030: SEA Environmental Report

**Consultation in terms of Regulation 7 of the Strategic Environmental Assessment
Regulations (S.L. 549.61)**

Reference is made to the consultation of the Ministry for Transport, Infrastructure and Public Works (MTIP) on the Strategic Environmental Assessment (SEA) Environment Report for Malta's National Transport Master Plan 2030.

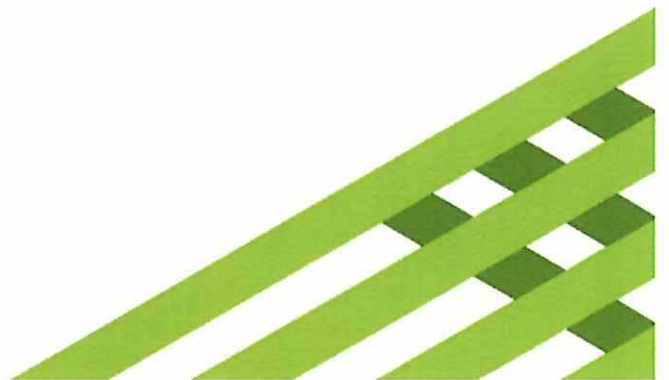
The National Transport Master Plan 2030 aims to guide Malta toward a sustainable, multi-modal and climate-resilient transport system that reduces reliance on private vehicles while improving connectivity, efficiency, and environmental performance. ERA's comments on the Environment Report are enclosed, with the aim of ensuring that potential environmental impacts are mitigated at an early stage.

Yours sincerely,



Kevin Mercieca
Chief Executive Officer

Mr. Kevin Mercieca
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ERA's comments on the Strategic Environmental Assessment (SEA) Environment Report (ER) for Malta's National Transport Master Plan 2030

2nd December 2025

1. Introduction

1.1 ERA welcomes the opportunity to comment on the Strategic Environmental Assessment (SEA) Environment Report (ER) of Malta's National Transport Master Plan 2030.

1.2 The following comments are provided without prejudice to ERA's environmental review of the specific infrastructural projects arising from this Plan. This may include an Environmental Impact Assessment (EIA) and/or an Appropriate Assessment (AA).

2. General comments

Main infrastructural projects

2.1 ERA welcomes various proposals in the plan which are intended to alleviate road congestion and associated environmental issues. However, some proposals could give rise to environmental impacts, including land take-up and impacts on the landscape:

- Resolving conflicts between high traffic volume and urban activity and improving road safety at Xemxija Road [Nodes NA6-NA7] - Xemxija Bypass. The impacts on the countryside and the coast are unclear, including those on is-Simar wetland and environs (Natura 2000 site and a Bird Sanctuary); the marine Special Areas of Conservation (SAC) and Special Protected Areas (SPA); Wied Il-Miżieb; and the landscape and other surrounding natural sites.
- The future upgrading of Għadira Road. Details of the proposal are not available and therefore, its potential impacts on the Għadira wetland (Natura 2000 site and Bird Sanctuary); the beach and marine SAC/SPA; other natural sites (e.g. garrigue areas); and the surrounding landscape, are unclear.
- The New Link Road to Smart City, most of which is proposed on rural land, seems different from the latest proposal reviewed by ERA. The indicative route/s shown in the plan needs to be updated in line with the proposal currently reviewed by ERA.
- The proposed new link road/bypass at Burmarrad (see Figure 32 in the Forecast section of the plan), the removal of bottlenecks along Triq Burmarrad and other related road/junction improvements in the area, would take-up further rural land.
- Improving road infrastructure quality of the Distributor Road (Route 30) to Marsaxlokk Bay and reducing traffic impact in village centre on Marsaxlokk Road Nodes SA13-SD17], will result in take-up of rural land due to a new link road.
- New multi-modal hubs (and similar facilities) affecting rural land ODZ, such as that at Haż-Żabbar (Measure 2.4.2.4). Details of the proposed modal hubs (Figure 19 in the Plan) and the new Park and Ride facilities are not available.
- Infrastructure required to implement active travel and micromobility, such as the possible upgrading of certain roads ODZ to accommodate cycle lanes. The impacts of these proposals (Measure 2.3.1.2) on biodiversity, soil sealing, natural sites (e.g. valleys and watercourses) and the landscape are unclear at this stage.

- The possible expansion of the Airport precincts to accommodate future growth including that related to business and leisure needs (Measure 2.11.1), could have adverse impacts on adjacent rural areas.
- 2.2 ERA should be consulted on the details of the above-mentioned proposals, amongst others, to ensure that relevant environmental considerations, objectives and mitigation measures are factored into strategic decisions and the design of infrastructure at an early stage. Priority should be given to the lowest environmental impact options. Take-up of fresh land should be considered as the last resort, while pristine landscapes and open countryside should be safeguarded. It is suggested that most infrastructural works are carried out within urbanised contexts, whereas other minor works are implemented within the footprint of existing roads and similar committed sites. The SEA study should also consider, as part of the mitigation measures, the possibility of rehabilitating redundant roads into public green spaces.

3. Detailed comments

Chapter 5 - SEA Objectives and Indicators (Table 5.1)

- 3.1 The **landscape** indicators considered by the SEA study focus on landscape character and scenic value in general. It is suggested that the impact assessment study could also have regard to potential impacts on: Areas of High Landscape Value (AHLVs); SPED's sensitive landscapes; open countryside; urban and urban fringe settings; and extensive natural areas, valleys and coastlines.

Chapter 7 – Impact Assessment (Table 7.2)

- 3.2 Theme 3: Public Transport and Shared Mobility Services: Early engagement with ERA is recommended in relation to the Mass Rapid Transit System (Measure 2.4.1.3). Efficient use of existing parking facilities is welcomed (Measure 2.4.2.4), with new facilities preferably located within areas already zoned or committed for development to reduce pressure on undeveloped land.
- 3.3 Theme 4: Multimodal Transport: The design of hubs (Measure 2.5.2.1) should incorporate green infrastructure to enhance environmental quality and climate resilience (e.g. mature trees for shade, green roofs, rainwater harvesting for in situ irrigation, etc.).
- 3.4 Theme 5: Privatised Motorised Transport: The ER does not address the management of end-of-life batteries, including storage facilities and pollution risks (e.g. land and water contamination) resulting from Measure 2.6.3.4. Such facilities should be sited within existing urban or committed sites.
- 3.5 Theme 6: Road Safety and infrastructure Management: Stormwater infrastructure in ODZ areas (e.g. pipes, soakaways and reservoirs) should be contained within the footprint of existing roads (Measure 2.7.2.3).
- 3.6 Theme 8 & 9: Internal & External Maritime Transport: While some projects under Objectives 2.9 and 2.10 are already under discussion with ERA, others require further consideration as more details become available. At this stage, the SEA ER could distinguish between construction and operational impacts and outline mitigation

measures for marine or coastal interventions, such as avoiding sensitive habitats (e.g. seagrass) or addressing potential operational pressures (e.g. noise).

- 3.7 Theme 10: Aviation: Ongoing coordination with ERA is recommended to ensure proper identification and mitigation of environmental impacts from Objective 2.11.

Chapter 8 – Recommendations and Mitigation Measures

- 3.8 The ER's mitigation framework is useful for addressing some of ERA's environmental concerns. It is suggested that projects adhere to these measures and those proposed (see above) to ensure environmental safeguards are maintained throughout the implementation of the plan.

Chapter 9: Monitoring Requirements

- 3.9 Other indicators are to be considered to assess improvements in air emissions (e.g. public transport patronage, traffic counts and vehicle classification, increase in the use of active mobility, etc.). Where applicable, monitoring proposals in the ER should be aligned with existing national monitoring frameworks, including permitting regimes requirements, to ensure consistency and avoid duplication.

Chapter 4 – Environmental Baseline (Human health and population)

- 3.10 ERA suggests the following amendments to Paragraph 4.25: *To this end the Government has prepared 'strategic noise maps' for major roads, airports, and the agglomeration including road, aviation and industrial noise sources, see Figure 4.9 to Figure 4.13.* No strategic noise maps have been prepared for airports.
- 3.11 Paragraph 4.26 – A new set of noise maps for the assessment year 2021 has recently been published. The SEA ER is to be updated to reflect the latest available information. For instance reference to the Noise Action Plan in Appendix 2 should read 2023 (<https://era.org.mt/wp-content/uploads/2023/12/Noise-Action-Plan-Agglomeration-Interactive.pdf>)
- 3.12 Paragraph 4.27 – Figures and percentages are to be updated according to the latest maps and report: R4_Noise_Maps_Malta_Final_Report_compressed.pdf
- 3.13 Paragraph 4.73 – Another exceedance of the PM10 daily limit value was recorded at the Msida station in 2023, when the limit value was exceeded on 52 days. Paragraph 4.74 to be revised accordingly.
- 3.14 The link for accessing the Air Quality Plan is to be updated as follows: <https://era.org.mt/wp-content/uploads/2025/02/DIGITAL-Air-Quality-Plan.pdf>.