

## Comments on the Environmental Impact Assessment Report

**PA/08471/19 & PA/04783/20**

Construction of a berm and revetment including dredging at Valletta Grand Harbour & Construction of new Breakwater arm beneath St. Elmo to offer protection to the Grand Harbour during North Westerly storms

Site at Valletta Grand Harbour, Il-Port Il-Kbir, Belt Valletta

### **1. Consultees' Comments on the EIA Report (2 March 2025 – 2 April 2025):**

No.:	From	Comments	EIA Coordinator Response (28 May 2025)
1	Environmental Health Directorate  Date (27/03/2025)	<p>With reference to environmental impact assessment and appropriate assessments dated March 2024 regarding subject indicated in caption, please be informed that the Environmental Health Directorate (EHD) would like to submit the following comments/recommendations regarding this proposal:</p> <p>EHD Comments and recommendations:</p> <p>Dredging Works and Construction Phase</p> <p>Should this proposal be accepted, the applicant is to adopt best practice methods together with good site practices and is to ensure compliance with Environmental Management Construction Site Regulation during the construction phase. The applicant is to also implement all proposed mitigation measures so as to cause least nuisance and mitigate adverse air, (for dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors in the Area of Influence and on the general public. Such measures highlight the importance of the drawing up and the implementation of a Construction Management Plan, CMP, to ensure adherence to proper site management practise so as to address sea water pollution and to mitigate other adverse construction impacts, including construction traffic impacts and any other measures related to public health. The CMP shall include, as indicated in the EIA, the Dredging Management Plan to address all impacts that will arise from such activity. Monitoring of construction works is also highly recommended in order to ensure the implementation of all necessary mitigation measures and adherence to work practices throughout all phases of the project. Although the proposed project does not interfere with any official bathing site, measures must still be taken in order to preserve the sea water quality. Any silt curtain used is to be fixed to the ground in order to prevent the</p>	Noted





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3	<p>Superintendence of Cultural Heritage</p> <p>Date (02/04/2025)</p>	<p>Proposal The proposal is for the construction of a berm and revetment (including dredging) at Valletta Grand Harbour and the construction of a new Breakwater arm beneath St. Elmo to offer protection to the Grand Harbour during North Westerly storms</p> <p>The Scheme is entirely marine based and located within a highly culturally and visually sensitive area across three sites along the Sciberras Peninsula, namely:</p> <ul style="list-style-type: none"> <li>• A berm that stretches from St Elmo Point to the northern side of Mgerbeb Point;</li> <li>• Two revetments located on the southern side of Mgerbeb Point close to Barriera Wharf; and</li> <li>• A new breakwater at St Elmo Point, located outside the current St Elmo breakwater.</li> </ul> <p>The proposal has undergone consideration and amendment reflecting engineering and hydrodynamic studies and is deemed to be the most effective solution to achieve the intended level of protection.</p> <p>Cultural Heritage Context</p> <p>The proposed works are set within the historically significant Grand Harbour and the city of Valletta, a designated UNESCO World Heritage Site. This location is distinguished by a rich tapestry of historical and architectural elements, including the British-period breakwater, the Knights' period fortifications, and various heritage features along the foreshore. Among these are the Boom Defence and searchlight installation, both linked to historical defence against enemy action, as well as rock-cut spending beaches designed to mitigate wave action.</p> <p>Furthermore, the harbour itself holds substantial archaeological potential, with the possibility of significant remains and deposits that reflect its long and evolving history of coastal and maritime activity.</p> <p>The cultural significance of this context is formally acknowledged through various planning mechanisms designed to identify, protect, and preserve these invaluable heritage assets. These protective mechanisms include:</p> <ul style="list-style-type: none"> <li>• Area of High Landscape Value of the Harbour Fortifications (G.N. 133 of 2001)</li> <li>• Grade 1 Military Bastions, including Bastions Is-Sur Ta Santa Barbara, Bastions Is-Sur t'Isfel ta' Castille, Bastions Is-Sur Ta' San Lazzru, Bastions Is-Sur Ta' Abercrombie</li> <li>• Grade 1 Grand Harbour Boom Defence and Grand Harbour Breakwater (G.N. 276 of 2008)</li> </ul> <p>Report on Cultural Heritage</p>	All comments noted

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		<p>The Superintendence has assessed the data gathered and compiled in the reports entitled EIA Report, EIA technical appendices and the Non-Technical Summary (Final Versions).</p> <p>It should be noted that beyond the independent studies and analysis, the Environmental Impact Assessment (EIA) makes reference to the findings of the Heritage Impact Assessment (HIA) carried out in the light of the UNESCO World Heritage Status of Valletta and assessing potential impact on its Outstanding Universal Values (OUV).</p> <p>EIA Report and Non-technical Summary (Report on Cultural Heritage)</p> <p>The EIA's report on cultural heritage refers to the following potential impacts:</p> <ol style="list-style-type: none"> <li>a. Loss of or damage to artefacts or deposits through the construction of the marine defence structures - remote sensing surveys found no cultural heritage targets within the Area of Study (AoS) from St. Elmo's Bridge to Mgerbeeb Point. This absence is likely due to extensive dredging and other activities, including the creation British-built submerged berm/spending beach. Combined with the lack of seabed sediments, this suggests the Scheme's impact through artifact or deposit loss is minimal.</li> <li>b. Disturbance to artefacts or deposits from sediment scour or accumulation - Since the remote sensing survey recorded no features and the Scheme is largely on bedrock (with some required dredging), no immediate loss or damage to archaeological artifacts is expected. Additionally, the lack of sediment and site seabed profile suggest minimal impact from sediment scour or accumulation as a result of works. The impact is therefore not considered significant.</li> <li>c. Impacts on the Cultural Landscape of Valletta- The EIA reports that that the insertion of defence structures in the Grand Harbour will have varying effects on Valletta's cultural landscape. The submerged berm will generally remain unseen, except for navigational markers. In rare cases, such as during storms or extreme low tide, it may become briefly visible above sea level. Given its location in a functional harbour, its impact on the cultural landscape is considered minimal, with negligible visual effects as it remains submerged most of the time. Conversely, the revetments south of Mgerbeeb Point, including the natural cliff below Lower Barrakka, the tunnel entrances, and the outer breakwater north of St. Elmo, are expected to have a major visual impact. These interventions are considered intrusive within the Grand Harbour's protected landscape, which includes historic fortifications, and the surrounding coastal environment designated as an Area of High Landscape Value.</li> </ol>	

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		<p>d. Impacts on the World Heritage status of Valletta (berm &amp; revetment)- The EIA refers to the conclusions of the HIA on potential impact on the OUV. The berm and revetments between St. Elmo Bridge and Mgerbeb Point are assessed to have no significant impact on the area's visual, historical, or heritage value. While undoubtedly visible, they are not deemed to be visually intrusive from land or sea, do not affect the historical significance of the site in relation to the two sieges, and have no impact on maritime tourism, the UCA and AHLV designations, or the World Heritage Site's OUV. Additionally, they do not compromise the wholeness, integrity, or key attributes of the fortifications.</p> <p>e. Impacts on the World Heritage status of Valletta (outer breakwater)- The Heritage Impact Assessment (HIA) also evaluated the proposed St. Elmo's Point breakwater, and it concludes that the breakwater is visually intrusive, affecting visual connectivity, particularly from the sea, and impacts the industrial heritage of the historic St. Elmo breakwater and bridge. It also affects the historical significance of the area, a key reference point in the two sieges, and may influence maritime tourism. Additionally, the project impacts the UCA and AHLV designations, potentially altering the form, design, location, and setting of the World Heritage Site's Outstanding Universal Value (OUV). While it does not compromise the wholeness or integrity of the site, it poses some threat to key fortification attributes.</p> <p>Benefits of the overall scheme</p> <p>Ultimately, the Scheme (including the revetments, berm, and outer breakwater) offers significant benefits, classified as majorly beneficial under ICOMOS guidelines. It will reduce wave action, minimising erosion of wharves, sea walls, fortifications, and coastal caves at Mgerbeb Point, while also improving conditions for harbour communities, maritime industries, and small craft navigation. Additionally, it does not impact tourism dynamics in the harbour.</p> <p>The HIA evaluation concludes that the outer breakwater poses minor risks, with its impact on the WHC OUV rated as "negligible to minor change" and on the wider context as "negligible to moderate change." The berm and revetments present no significant risk to heritage integrity. The submerged berm is considered non-threatening to the wholeness, intactness, and authenticity of the site.</p> <p>Mitigation Measures</p> <p>The HIA concludes that the project supports the long-term conservation of the WHC and its context. Nevertheless, the HIA recommends redesigning the outer breakwater at St. Elmo's Point to reduce its impact on authenticity and integrity—potentially replacing it with a lower structure or a</p>	

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		<p>submerged berm. Further studies on mitigation effectiveness and hydrodynamic performance are advised.</p> <p>Since no features or deposits were found in remote sensing surveys, no seabed mitigation is deemed necessary. Nevertheless, archaeological monitoring during dredging in sediment areas could help identify and protect any undiscovered artifacts.</p> <p>The proposed structures will reduce coastal erosion, benefiting Valletta's restored heritage. The main concern is the visual impact of the outer breakwater on the industrial and cultural heritage of the Sciberras peninsula. A redesign could lessen this impact, but its feasibility must be weighed against costs and effectiveness.</p> <p>Report on Visual Impact  The berm and revetments are located along the Valletta coastline beneath the Siege Bell War Memorial and Lower Barrakka Garden, while the breakwater is positioned at St. Elmo Point, with an interface on both the Grand Harbour and Marsamxett Harbour. This maritime setting is framed by the historic urban landscape of Valletta, a UNESCO World Heritage Site, and the Harbour Fortifications AHLV. The Grand Harbour is dominated by the fortified skylines of Valletta and the Three Cities, while the modern, high-rise landscape of Sliema and Gzira contrasts sharply along Marsamxett Harbour. The sea and harbour activity remain integral to the area's cultural and visual identity, with the outer Grand Harbour retaining its historic character, unlike the northern Marsamxett coastline, which has undergone significant transformation.</p> <p>The Superintendence notes that the visual impact of the Scheme varies by viewpoint, with effects ranging from minor to major negative significance. The impact level depends on the scale of change, the view's intrinsic value, and viewer sensitivity. Of the nine viewpoints, two show major impacts, two moderate to major, and four show moderate impacts.</p> <p>While a lower structure could reduce visual impact, any above-sea-level structure would still be visible. This office notes that a lower breakwater would offer some shelter but acknowledges this would be less effective than the proposed design. If redesigning is not feasible, mitigation of visual impact may be achieved through matching the colour of the revetments and breakwater to the natural rock.</p> <p>Conclusion and Recommendations</p>	<p>Noted</p>

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		<p>The proposed Scheme, including the berm, revetments, and outer breakwater, represents a long-term solution to improve the Grand Harbour’s resilience against north westerly storms. The design has been refined based on engineering and hydrodynamic studies, ensuring its effectiveness in wave attenuation, erosion reduction, and improved maritime conditions.</p> <p>From a cultural heritage perspective, the berm and revetments are assessed to have no significant impact on Valletta’s UNESCO status or historic landscape. However, the outer breakwater at St. Elmo’s Point is considered visually intrusive, affecting perceptions of historic fortifications, visual connectivity, and perceptions of the area’s industrial heritage. While it does not compromise the wholeness or integrity of the site, concerns remain regarding its impact on authenticity and the visual setting.</p> <p>The Superintendence acknowledges the Scheme’s overall benefits, particularly in coastal protection, conservation of fortifications, and improved maritime operations.</p> <p>Reflecting the EIA’s recommendation, the Superintendence would not be averse to a lowering of the proposed breakwater so as to lessen visual impact. Nevertheless, if a redesign is not feasible, alternative mitigation measures—such as colour matching the new structures to the surrounding natural rock and heritage elements—should be explored to enhance visual integration within the historic setting. Should the redesign of the breakwater prove not feasible, the Superintendence recommends that the project proponent submits a comprehensive justification in the full development application detailing such reasoning. Any additional documentation supporting such reasoning is highly recommended.</p> <p>In addition, the Superintendence reserves the right to impose specific measures including monitoring to ensure the safeguard of archaeology as may survive within the site and as may be impacted by proposed works. To this end, the Superintendence asks for more details and access to the surveys carried out by Geomara. More specifically:</p> <ul style="list-style-type: none"> <li>- Files of all the remote sensing data that was collected of the Grand Harbour (including side scan, magnetometry, sub-bottom, and multi-beam)</li> <li>- A full report listing every contact (including their coordinates, description, and a high-res close up)</li> </ul> <p>The Superintendence urges that this data be made accessible for review and verification at the earliest possible and prior to the start of any works.</p>	<p>Noted</p> <p>Noted</p>