

Ex-Jerma Palace Hotel Site Development Brief

Submission from Moviment Graffiti

Moviment Graffiti reviewed the second consultation document in connection with the *Ex-Jerma Palace Hotel Site Development Brief* and is hereby submitting its feedback:

- Whilst noting a reduction in the developable floorspace to 65,000sqm (compared to the exaggerated 100,000sqm arbitrarily laid down in the October 2019 consultation) Moviment Graffiti still deems this size to be overly intensive and disproportionate. It constitutes more than double the floorspace of the ex-Jerma Palace Hotel (30,000sqm). Allowing a project of such scale will only benefit the developers and leave a deleterious impact on residents and visitors alike. It is also clear that the surrounding infrastructure cannot sustain the increased pressures from such a large-scale development.
- The Development Brief would allow buildings to rise 32 meters above sea level - up to eight storeys – significantly higher than the current ex-Jerma structures. The new buildings would rise over St. Thomas Tower by 9 meters as well as dwarf the surrounding residences. It makes no sense to have buildings of such height situated along the coast, overshadowing a historical site and three times higher than the buildings behind them.
- A large portion (26,000sqm floorspace) of the development envisaged by the Brief would accommodate residences, amounting to around 160 apartments. Residential development on the ex-Jerma site will only benefit the developer who will rake in money through a real-estate project. It will have no social and economic benefits to the locality and the country. Moreover, as stated in our feedback submitted to the first consultation process: i) the mere fact that residential units are required for the economic success of any eventual project is, in itself, of concern ii) the inclusion of residential units is in direct breach of a Parliamentary Act signed between Government and the then-Libyan state company Lafico in 1982. This agreement declared that the area in question could only be developed for touristic purposes.

The current outline also ignores the present realities. Already in 2019, an MDA report drafted by a reputable company indicated that the demand for high-end properties in Malta is low due to a number of factors, including lack of finishing standards and general attractiveness. We believe that including residential development on the site is purely a measure to appease developers, not residents, and far less the economy. The risk of lumping Marsascala with more empty residential units is real, considering the above factors as well as the impact of Covid-19 on our economy and society.

- This is a flawed consultation process since, besides the ex-Jerma Palace Hotel site, the Development Brief area also includes a green area which should be accessible to the public and where no increase in height or volume is permitted, as well as a heritage site for which there is already a policy applicable. The Local Plan clearly defines the area which should be subject to the Development Brief. These two additional areas should have never been included.

Instead of seeking to accommodate specific development ambitions, the Development Brief should prioritize the wellbeing of residents and enhance the town's social, historical and environmental value. Thus, Moviment Graffiti reiterates that any development on this site should be exclusively for touristic purposes and should not be larger than the floorspace, height and footprint currently occupied by the ex-Jerma Palace Hotel.