

Feedback to Ex-Jerma Palace Hotel Site Development Brief

Introduction

Following internal consultation and with Marsaskala residents, particularly those closest to the affected area, Moviment Graffiti is responding to the PA's call for consultation regarding the ex-Jerma Palace Hotel development brief.

The Jerma Palace Hotel opened its doors in 1982, following an Act of Parliament which permitted development on the prime site specifically for tourism purposes. Being the largest and only luxury hotel in southern Malta, the Jerma Palace Hotel played a significant role in the transformation of a once quiet village into a bustling town with a relatively young population. After 25 years of operations, the Hotel was shut down in 2007.

Over the years, the abandoned hotel has become a structurally unsafe site, with a number of recorded accidents occurring, and effectively depriving the general population from the full enjoyment of the coastline surrounding it.

The closure of the hotel had a considerable initial negative effect on Marsaskala, both in terms of employment as well as economic activity. Over the years, however, Marsaskala has rebuilt itself into a thriving hub in the south for tourism, entertainment and family-friendly outings, as well as an attractive locality for young couples to start their families in.

The current rate of economic growth and property development has left residents concerned as to what the addition of a massive hotel, as well as even more residential and commercial units, could mean for their town. Marsaskala is already struggling with infrastructural issues relating to overdevelopment, public spaces are declining, and property prices are rapidly becoming unaffordable for the local community.

While there is a strong general consensus that the current building needs to be demolished and the site needs to be rendered safe, with full access to the coast, there are considerable concerns that a large-scale development could mean the tipping point towards an unlivable Marsaskala.

Our Submissions

After giving due consideration to the development as well as an application for development of the site (PA/04710/18), the following points emerge:

- We agree with the proposed demolition of the current abandoned hotel and urge the PA to reissue an enforcement order in line with the applicable legislation;
- The Development Brief commits 100,00sqm for development, a size which is overly intensive, disproportionate and exaggerated;
- The 166 residential units mentioned in the former application (PA/04710/18) have been added so that this massive, large-scale project can be self-financed. This raises two major issues:
 - The mere fact that residential units are required for the economic success of this project is of concern, and should send plans immediately back to the drawing board. In the 80s and 90s, the massive “five-star” development trend was successful because mass tourism was on the rise. We are living in significantly different times, where mass tourism is being criticised for its environmental and social impact on its surroundings, and in a time where smaller investment is favoured.
 - Secondly, 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 above point has also been reiterated in the 2006 South of Malta Local Plan. We also strongly agree that this area should not be used for residential purposes, but only for touristic purposes while maintaining public open spaces, as well as access to both St Thomas Tower and the Jerma shore, which is popular among many bathers;
- As many residents have pointed out, Marsaskala was not among the localities earmarked for tall buildings of more than 10 storeys. The proposed development brief addresses a 13-storey high-building, well above the original 5-storey building of 38,745sqm. This would permanently alter the town’s skyline and give precedent to other buildings being raised to similar heights;
- Simple ‘public access to the foreshore’ is not a sufficient guarantee. The brief needs to affirm that the foreshore remains untouched, with absolutely no alterations or interventions made to the natural rocky coast, and that access is not hindered in practice;
- The development brief ignores the social and environmental impacts of such massive projects;
- The proposed development will have negative shadowing effects over a large part of the town, and will dwarf the historical St. Thomas Tower, making it invisible from sea level;
- The general public can never be compensated adequately for the loss of public space resulting from this project;

- We also question the need for this project, considering the recent warnings about oversaturation in tourist accommodations from the MHRA¹ as well as the lack of interest in large high-end projects flagged in an MDA-commissioned study². There is a very real risk that this massive project will be merely dumped onto the residents of Marsascala, without contributing in any manner to their wellbeing, to that of their town, and with very limited multiplier effects, especially if the project does not perform as per the current economic indicators.

Conclusion

In view of the above points, Moviment Graffiti and Marsaskala residents strongly feel that, while the redevelopment of the site in its original height and footprint is not in itself objectionable, we also think that this is an excellent opportunity to create an even larger open space to be enjoyed by the residents of the Marsascala and indeed all the Southern region, a demand that has been frequently echoed by the same residents.

We remain of the opinion that the development brief has been written to accommodate a specific development project, without any care for the wellbeing of the residents, the burden on the locality's infrastructure, the historical sights and the town's heritage, as well as its social impacts.

Moviment Graffiti firmly believes this development brief is a non-starter, and any development should be exclusively used for touristic purposes, without increasing heights, footprints or reclaiming land from the sea.

¹ <https://bit.ly/34DjbVW>

² <https://bit.ly/2qxdpGM>