

The Executive Chairperson  
Planning Authority  
St. Francis Ravelin  
Floriana

Date: 08/02/2021

Dear Sir/Madam,

**Planning Ref.:** PA 06714/20

**Other reference:** EA 00026/18

**Description of proposal:** Demolition of the existing Grand Hotel Verdala and its proposed redevelopment to achieve a better skyline and urban setting as per outline permit PA 6044/17. The development is spread over six floors above highest street level and two levels below. The proposed uses include: Class 1 residential units, Class 4B ancillary retail use, Class 3B hotel with ancillary facilities and garage making provision for 176 cars.

**Location:** Former Grand Hotel Verdala, Across Triq Inguanez, Triq ir-Rghajja, Triq San Bastjan, Triq Santa Katerina, Rabat, Malta.

Reference is made to the above-captioned proposal.

ERA's recommendation and representation on the said development proposal are being lodged in its capacity as an external consultee and an interested party in accordance with the Development Planning Act and the Development Planning (Procedure for Applications and their Determination) Regulations (S.L. 552.13).

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## **1.0 Procedural aspects following proposed modifications to the approved development**

This application (PA 06714/20) was submitted in July 2020 as a revision to the already approved development PA 06044/17 - *Demolition of the existing Grand Hotel Verdala and its proposed redevelopment to achieve a better skyline and urban setting. The development consists of class 1 residential units, class 4B ancillary retail use and class 3B 5 star Spa Hotel.*

The original proposal for the outline development of PA 06044/17 has been subject to an Environmental Impact Assessment (EIA), in accordance with the former EIA Regulations, 2007 (S.L. 549.46) specifically Schedule IA Category II, Sections 3.1.2.2 and 3.3.2.2, respectively. Following the publication of the revised EIA Regulations, 2017 (S.L. 549.46) and communication with the applicant, the project was re-screened and assessed as falling within the scope of Schedule I, Category I Section 7.1.1.1. The EIA focused on the following issues:

- (i) Geology and hydrology,
- (ii) Noise from operational traffic and vibrations,
- (iii) Air quality
- (iv) Landscape and visual amenity, and
- (v) Cultural heritage

The ERA had acknowledged the fact that the location of the site is very prominent and any interventions will be very visually sensitive on the landscape and the skyline. In view that PA 06044/17 was an outline application, ERA requested that the final design provides a smooth transition between the rural landscape and the townscape and that such aspect should be considered by the Planning Authority in the development consent process. The outline development permission for PA 6044/17 was granted in May 2020.

Following the approval of PA06044/17, ERA was informed through the PA consultation process for PA 06714/20 and the applicant, that a number of revisions were being proposed to the Verdala Hotel, namely related to design of the development, to the layout, height and massing, and to the elevational treatment.

Following ERA's preliminary assessment of the proposed development, ERA was in agreement with the revised plans related to the receding of the proposed blocks further away from the ridge and that there was more open space. However, the proposed design was more visually intrusive and dominant in the landscape and the environmental impact in relation to the landscape and visual amenity was considered to be more significant than that previously assessed in the EIA through PA 6044/17.

A revised design was sent directly to ERA by the architect on 4<sup>th</sup> December 2020. ERA's preliminary assessment was that the revised proposal was substantially similar to the one proposed through the approved outline (PA 6044/17). In this regard, it was considered agreeable from ERA subject to the submissions of the latest visuals. Subsequently a statement from the EIA coordinator and the Visual Impact Assessment were submitted directly to ERA on 22<sup>nd</sup> January 2021. Other relevant documents such as the Light report and Landscaping report were submitted on e-apps as per docs. PA/06714/20/96p and 102d respectively.

## **2.0 The Statement from the EIA Coordinator**

The statement submitted in 2021 outlines the results of an assessment of whether the revisions currently being considered under PA 6714/20 would have significant environmental impacts beyond that already assessed in the EIA for the development approved under PA 06044/17. Revisions were undertaken for the below topic areas:

- (i) **Landscape and visual amenity**  
The EIA coordinator notes that due to the changes in the height profile and design of the development, it is necessary to update the assessment on the visual amenity. Nevertheless, given that changes are related to the design and will not alter the potential impacts on landscape elements, local landscape tract and the character area, no further assessment is required in respect to the landscape character.
- (ii) **Geo-environment**  
No material changes are envisaged to the excavation proposal or to the construction methodology. Thus, the amount of excavation will remain the same, piling foundation will still be used and the removed soil will be reused. In this regard, the consultant does not consider necessary to update or to conduct a new assessment to determine the environmental impacts in respect of the geo-environment.
- (iii) **Cultural heritage**  
The EIA Coordinator notes that the impact of the proposed modifications on the cultural heritage aspects is not considered to be any different to what was anticipated in the EIA; therefore no additional assessment need to be carried out.
- (iv) **Noise and Vibration emissions**  
The revised project do not envisaged any changes to the nature and scale of the development or to the arrangement for vehicular access to/from the site. The statement also notes that though there is slight reduction in the number of car parking spaces provided on site, the hotel guestrooms will also be reduced from 40 to 26. This will likely reduce the traffic generated by the development. In this regard, no further updates are necessary.
- (v) **Air quality**  
In terms of air quality, the EIA Coordinator notes that given that no changes are related to the scale and nature of the project, no significant impacts are expected with regard to the traffic expected to be generated, and the arrangements for vehicular access and routes to/from the site. In this regard, no further updates are required.

The statement also confirms that there will be a decrease in the Gross Floor Area (GFA) to the scale of 746 m<sup>2</sup>. This is due to the fact that the GFA quoted in the EIA report (28, 003 m<sup>2</sup>) was not according to the definition for the GFA in Regulation 1 of the EIA Regulations (S.L. 549.46), and that the development assessed in the EIA had a GFA of 32, 606 m<sup>2</sup>.

### **3.0 Visual Impact Assessment (VIA)**

The Visual Impact Assessment identified five viewpoints representing the close range and mid-range viewsheds out of 11 viewpoints within the study area on which the project will cause an overall moderate positive impact. The research acknowledges that the proposed development extends further laterally than the existing building however, it is lower in height when viewed from the following viewpoints: is-Salbi tal-Gholja, Siggiewi (V3), it-telgha tas-Saqajja, ir-Rabat (V5), Triq tal-

Infetti, ir-Rabat (V7), Ta' Qali Craft Village, H'Attard (V8) and Triq Dun Manwel Zammit c/w Triq I-Imdina, is-Siggiewi (V11). As a result, the residual impact is considered as ranging from no significance to moderate positive significance.

#### 4.0 Other relevant documents

A light report and landscaping report were submitted on e-apps as per docs. PA/06714/20/96p and 102d respectively.

- **Light report (doc. 96p)**

The lamp design is being accepted. ERA included relevant conditions in this regard.

- **Landscaping report (doc. 102d)**

With regard to the landscaping report, species related to *Cremnophyton lanfrancoi* and *Anthyllis hermanniae* must originate from local stock (to avoid genetic pollution from imported specimens) and thus, *Anthyllis hermanniae* should be switched for *Anthyllis hermanniae* subsp. *melitensis*. The rest must also be from local stock such as *Erica multiflora*, *Medicago arborea*, *Capparis spinosa*, and *Lygeum spartum*. *Olea europaea*, *Laurus nobilis* and *Rosmarinus officinalis* can be obtained from foreign stock but local stock is ideally always used.

#### 5.0 Environmental assessment of the proposed development and ERA position

As discussed in the above sections, the statement from the EIA coordinator and the Visual Impact Assessment concluded that no new significant environmental impacts are envisaged following the modifications and amendments to the development other than those already identified in the previous EIA. In terms of the impact on visual amenity, the lowering in height of the buildings and the proposed design were substantially similar to the one proposed through the approved outline (PA 6044/17).

ERA is in agreement with the said conclusions of both the EIA statement from the coordinator and the VIA and has no further comments to add. With regard to the light report, ERA included relevant conditions as per below, whereas for the landscaping report, local stock should be used for the above-mentioned species.

The conditions that were issued for PA 6044/17 are still applicable except for the requirement for a landscaping report, since this was already submitted. In addition, ERA requests that the condition below is also included in the approved document in the permit.

**Condition to be included:**

**Mitigating light pollution**

The permitted development shall not be a source of light pollution, especially at night. To this effect, the following specifications shall be adhered to:

- (i) lighting shall be strictly limited to within the developed part of the site, and its height and orientation shall be designed in a manner that does not cause illumination beyond the developed site;
- (ii) the exterior lighting fittings and their supports shall be installed on the inner side of any peripheral landscaping, so as to be screened from the surrounding environment by means of the landscaping itself;
- (iii) all exterior lighting installed on site shall be horizontally aligned, downward-pointing, fully-shielded and full cut-off. No luminaire globes, uplighters and/or high-level floodlighting are allowed;
- (iv) all exterior lighting shall be of low-intensity 'warm light' colour with a temperature not exceeding 3000K; and
- (v) where appropriate, exterior lighting should be intruder-triggered or motion-sensor lighting, so as to avoid continuous nocturnal lighting.

Yours faithfully,

Marie Louise Zammit  
Environment Protection Officer  
f/Director Environment & Resources

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*Disclaimer*

*The above comments are being issued without prejudice to any additional issues which are regulated by ERA through any relevant environmental permitting and, or compliance mechanisms, as well as to any environmental considerations that may be beyond the scope of the application under consideration.*

*The above assessment is based on the information provided to ERA in the application. Should it result that such information is incorrect, incomplete or misleading, or in the event of any omissions, or subsequent modifications, amendments or changes to the proposal, application and/or related submissions, the above assessment (including any favourable consideration, lack of objection, any proposed conditions or lack thereof, or any other equivalent stance, etc.) may need to be reopened to ERA's satisfaction. ERA shall not take responsibility for comments, assessments or judgments based on information that is incorrect, incomplete, missing or misleading, and which is only discovered after its assessment, nor for any environmental impacts resulting from developments which it was not specifically consulted on. Furthermore, ERA also retains the right to take additional action should the information provided, or any incorrect, incomplete, missing or misleading details, be tantamount to fraud.*