E R S L I
c o n s u l t a n t s
Environmental *and* Resource Management
Spatial *and* Landscape Planning
Infrastructural Planning

ERA Ref: EA/00007/17
PA Ref: PA/03218/25

15 July 2025

Environment and Resources Authority (ERA)
Hexagon House
Triq is-Salib
Il-Marsa MRS 1541

Attn: Director
Environment and Resources

PA/033218/25: Proposed addition of 7 floors and 6 floors to Towers A and B respectively (including 1 duplex floor on each tower) to approved development in PA 3807/17. Proposal includes the addition of 76 apartments and 6 duplex apartments for a total additional 82 apartments.

Location: Former ITS Site, Wesghet George Portanier, Triq il-Profs Walter Ganado, Triq Pietru D' Armenia, Pembroke and ix-Xatt ta' San Gorg, Triq Joseph Zammit, San Giljan

EIA Coordinator's Statement

This statement refers to development application ref: PA/03218/25 for the addition of 82 apartments to the *City Centre multi-use development* which was approved in 2021 (PA, 2025; 2017). The environmental impacts of the approved development were identified and evaluated through an *environmental impact assessment* (EIA), the findings of which were reported in an *Environmental Planning Statement* (EPS) and an *Appropriate Assessment* (AA) in 2018, two statements regarding minor amendments, and in *Updated Documentation to the EIA and AA Reports* as well as an *Addendum* (ERA, 2017).

As indicated in the title of the application, the proposal under consideration involves an upscaling of what was approved in 2021. This involves the heightening of one of the residential towers by six floors and the other by seven.

As shown in the following table no modifications to aspects of the approved development, other than the residential towers, are proposed:

Table 1: Land uses: Units and Gross Floor Areas

Land uses Units and floor areas	Approved 2018	Approved 2021n	Proposed 2025l
Number of units			
Tourism: hotel rooms/suites	438	386	386
Residential: apartments	162	179	261
Parking: car parking spaces	1,819	1,267	1,267
Floor areas (m^2)			
Hotel (except back-of-house and terraces)	53,191	37,898	37,898
Residential (excluding cores)	33,776	28,971	39,718
Residential (including cores)	40,988	32,969	44,732
Office lettable space	13,232	0	0
Shopping mall: gross floor area	21,264	19,786	19,786
Shopping mall: rentable area	17,848	13,547	13,547
Lido and night club	11,762	962	962
Open public space	3,409	5,035	5,035

A selection of the project drawings is presented in Figure 1 to Figure 5 (on pages 2 to 6). Figure 1 shows the master plan of the City Centre development. It highlights the residential towers in question, namely TW-A and TW-B. These two structures are the only components in the development which are to be modified under the current proposal

1 Spencer • 6 Triq San Ġorġ Preca • Blata l-Bajda • Ħamrun HMR 1605 • MALTA
Tel: +356 2122 2560 Mob: +356 7953 7670 E-mail: paul.gauci@ersli.net
ERSLI Consultants Limited

Figure 1: Project drawings | Master Plan

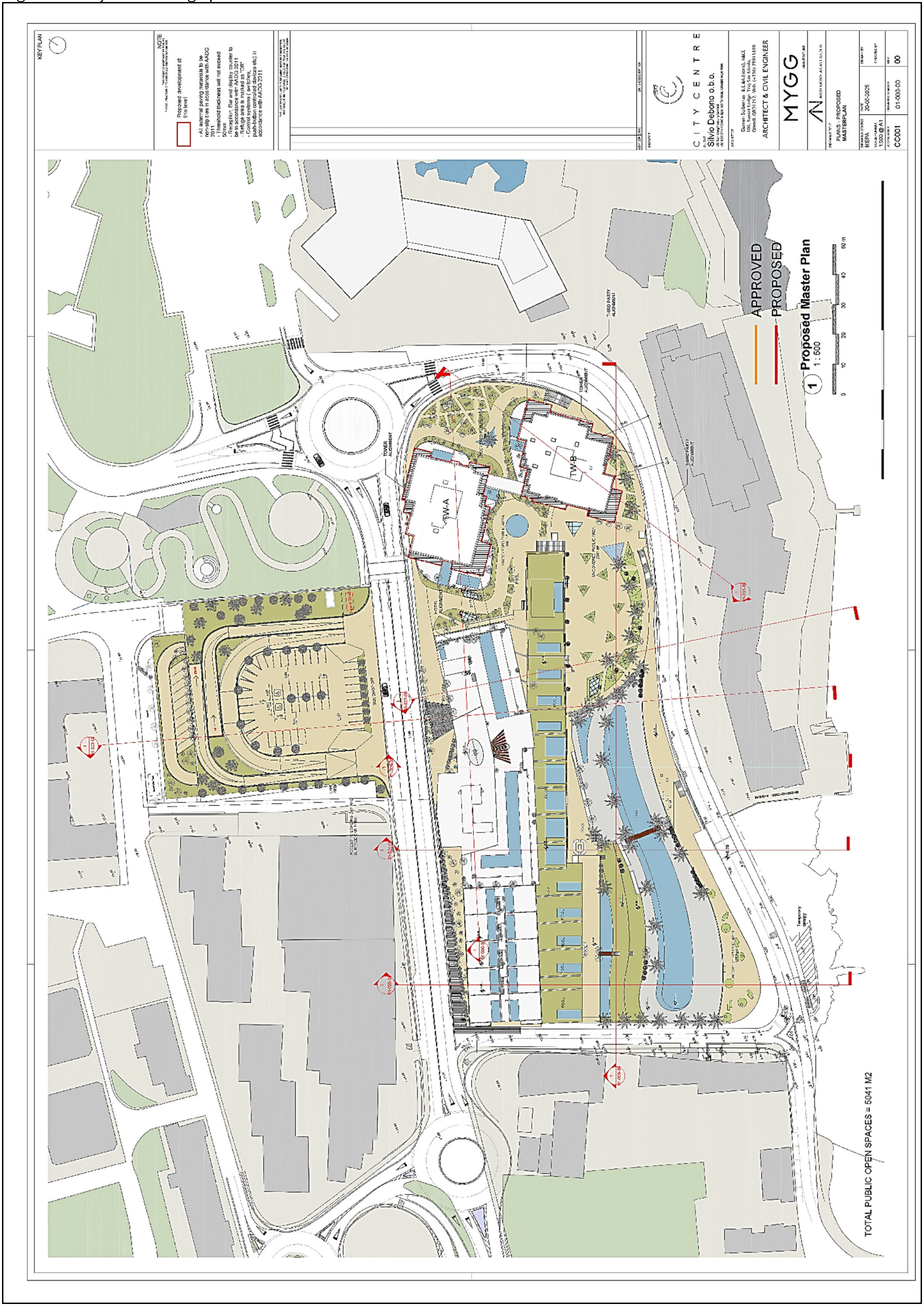

Figure 2: Project drawings | South elevation

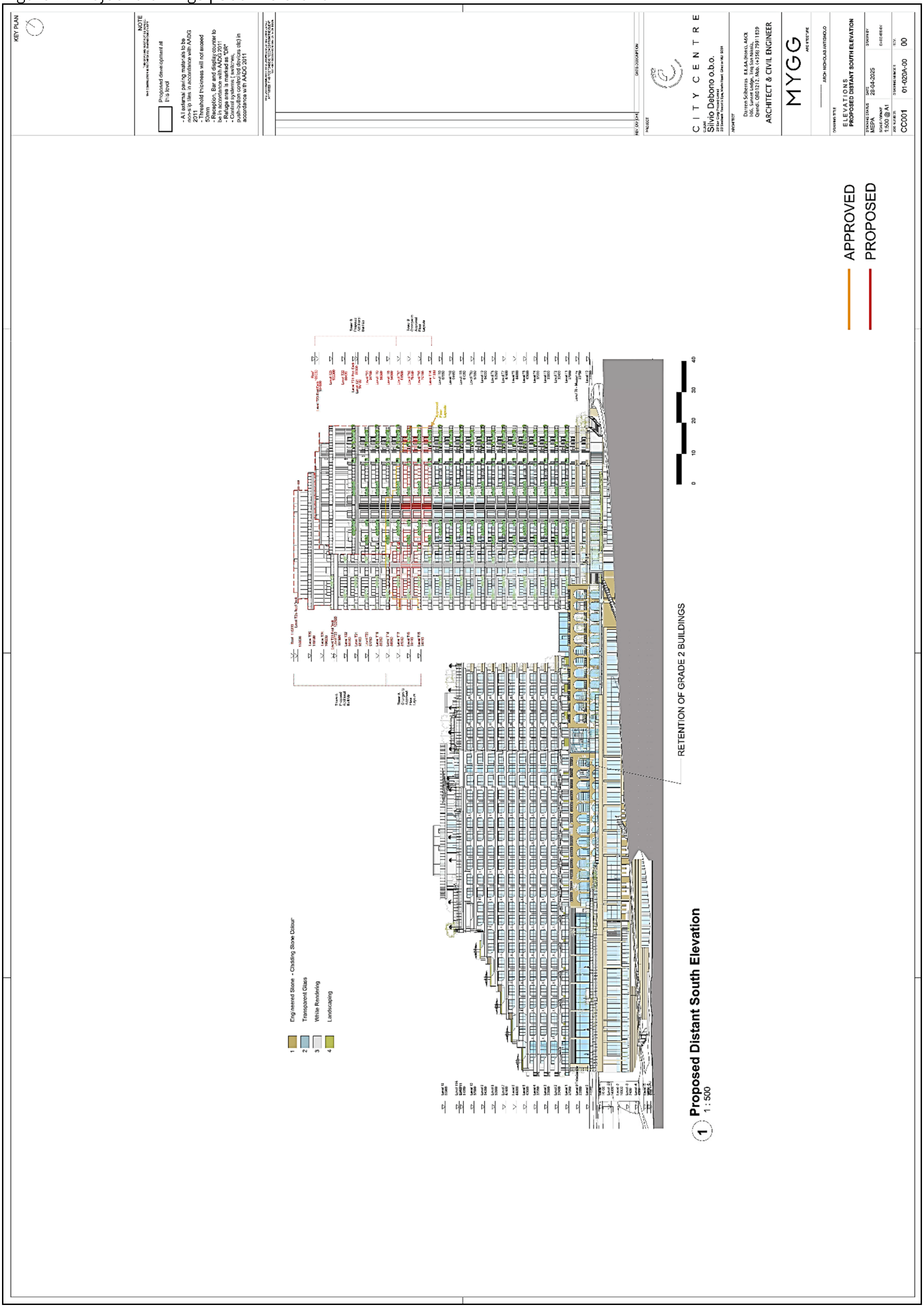

Figure 3: Project drawings | West elevation

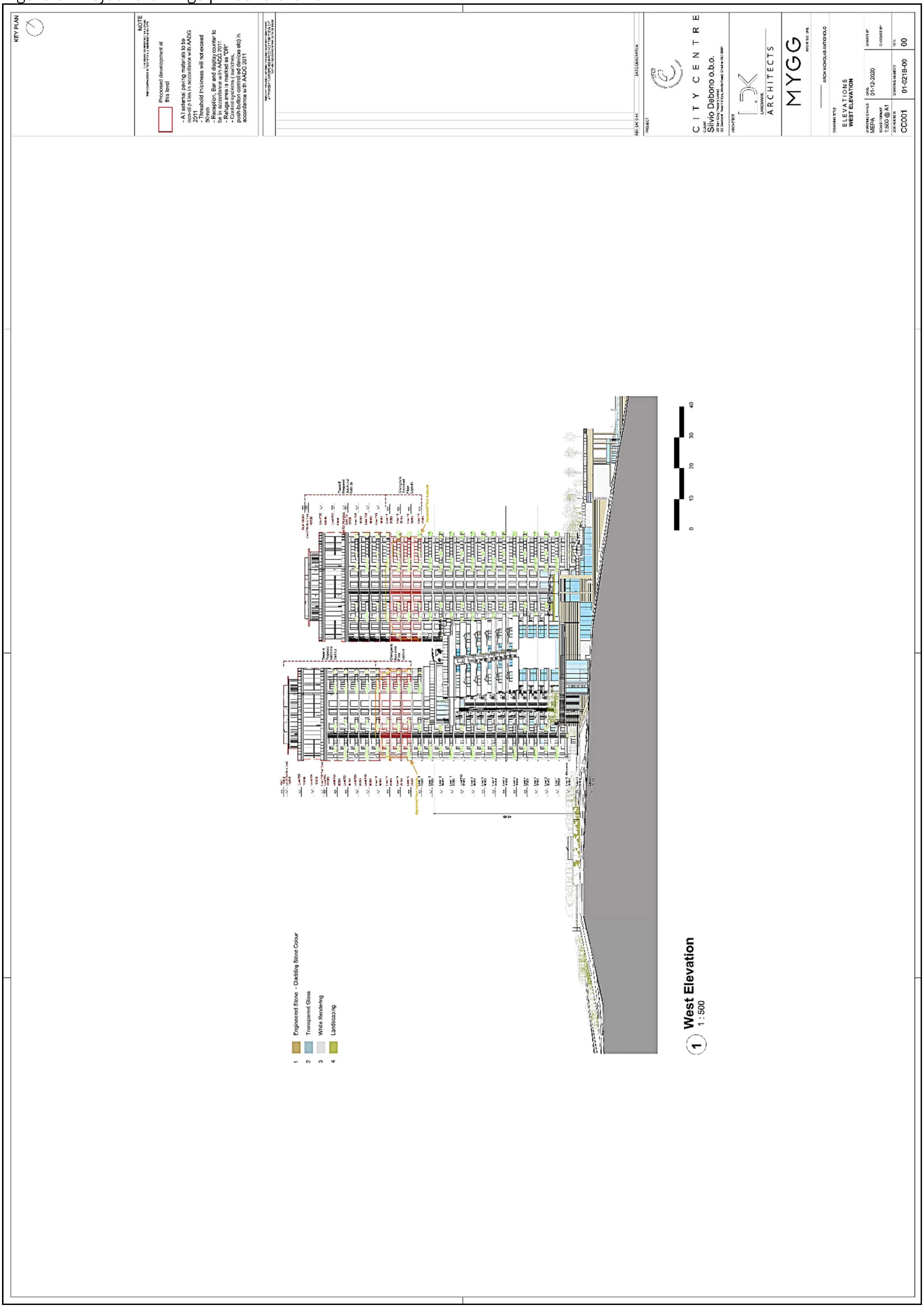

Figure 4: Project drawings | Section DD

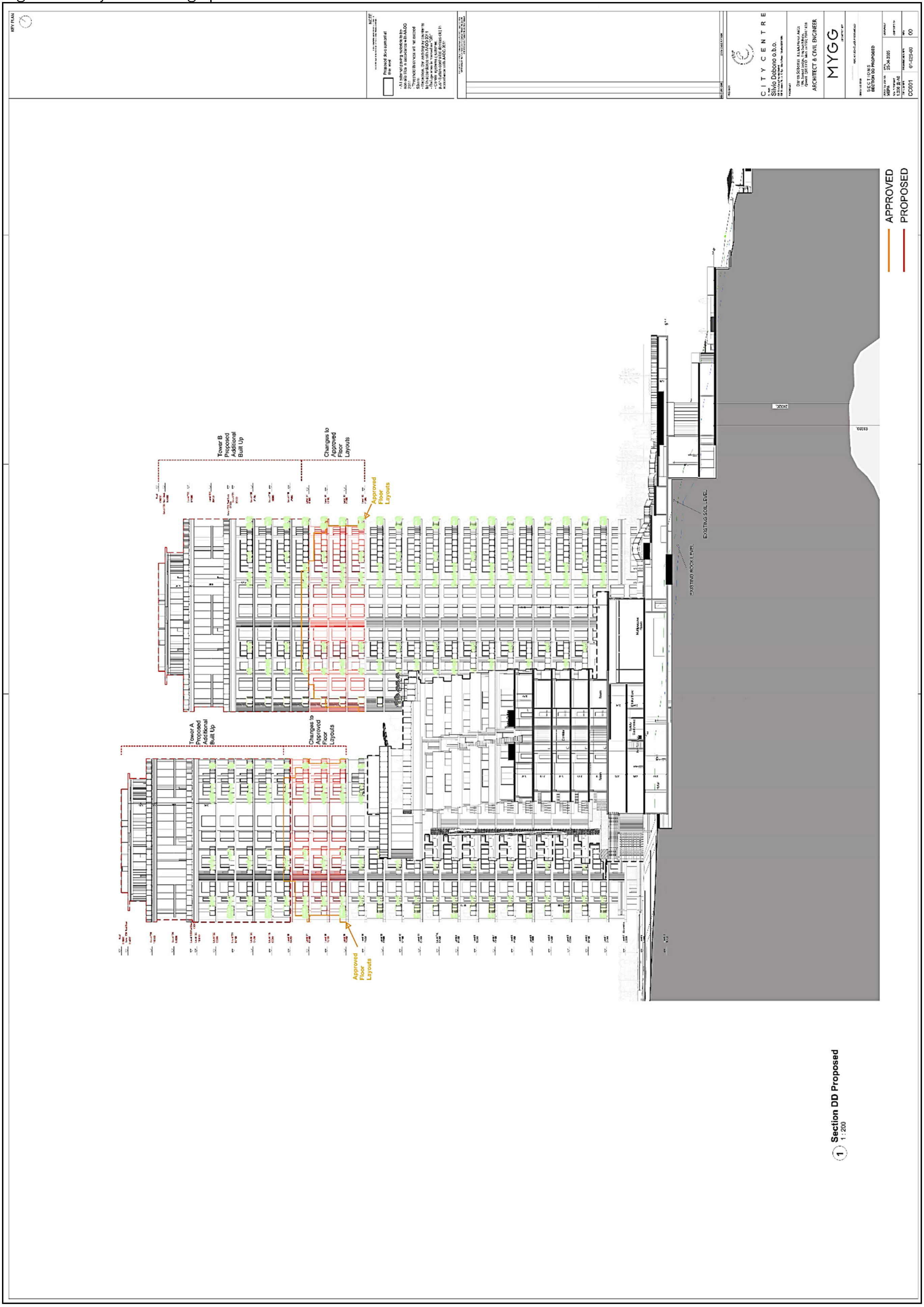

Figure 5: Project drawings | Section EE

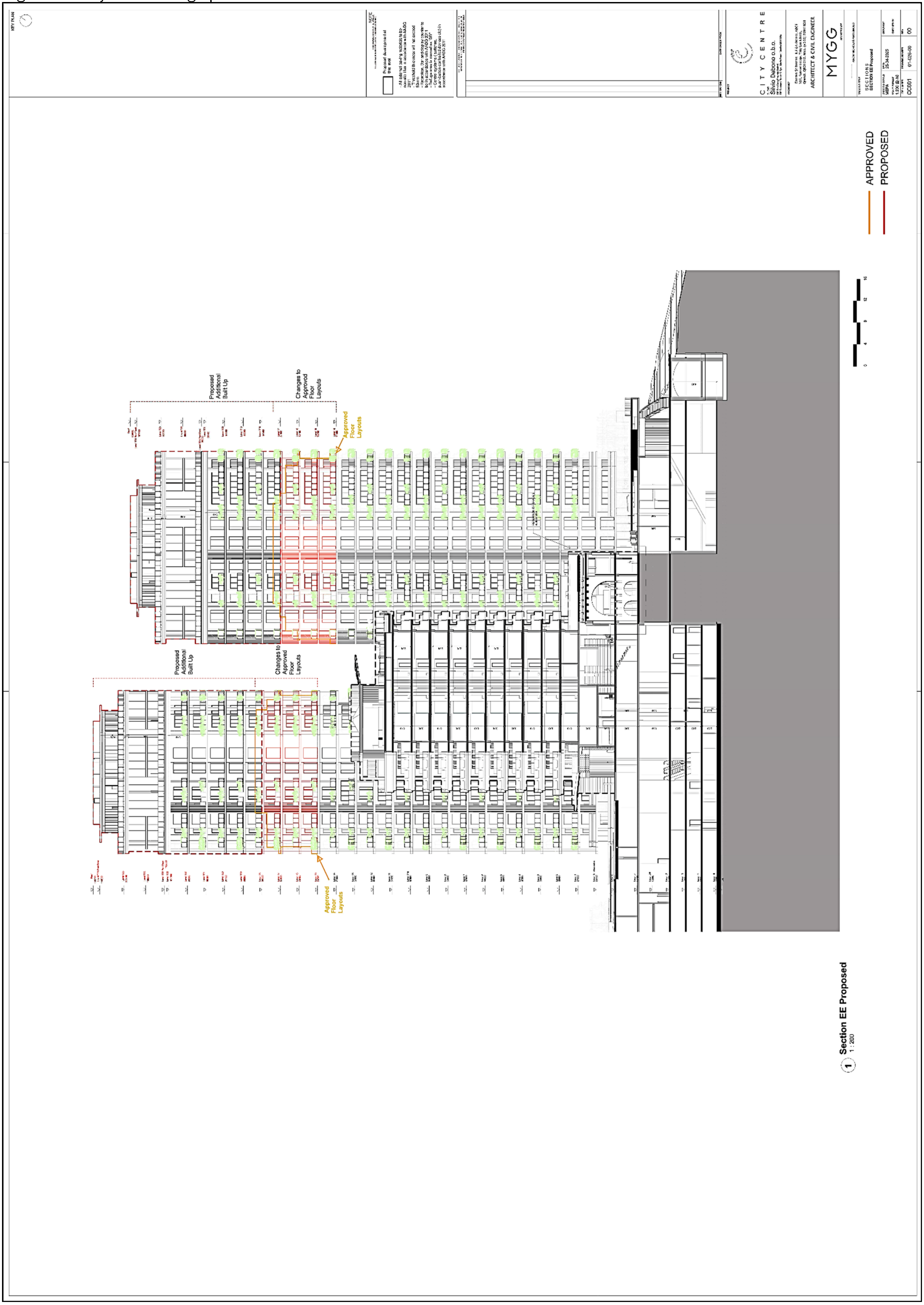

Figure 2 (on page 3) and Figure 3 (on page 4) present two elevations in which the proposed changes are highlighted, and Figure 4 (on page 5) and Figure 5 (on page 6) present transverse sections which also illustrate the increase in the heights of the two towers. The visualisations of the modified project are shown through photomontages presented in Appendix B02 (enclosed with this statement), together with the baseline photographs taken from the viewpoints presented in Appendix B01.

The original EPS covered the following environmental aspects:

- land/sea use and cover
- landscape and visual amenity
- geology and geomorphology
- water bodies (terrestrial and marine)
- ecology (terrestrial, marine, and avi-fauna)
- air quality
- noise and vibration
- cultural heritage
- green-house gas emissions
- wind climate/pedestrian comfort

The AA examined the likely impact of the then proposed development on the marine environment.

The upscaling of the proposed of the development would evidently result in increases in the significance of the environmental impacts identified and assessed in the EPS, with respect to specific aspects. The City Centre proposal which evaluated in the original EPS and AA was downscaled and approved in 2021 (PA, 2017). This downscaling was discussed in the above-mentioned in *Updated Documentation to the EIA and AA Reports* (ERA, 2017).

The currently proposed upscaling does not reach the same building height as the residential tower in the original version of the City Centre development, which was evaluated in the original EPS and AA.

One can argue that the level of significance of the environmental impacts in connection with land/sea use and cover, the landscape, geology and geomorphology, hydrology, ecology, cultural heritage, and marine environment would be more or less similar for the three proposals (i.e., the original proposal, the one approved in 2021, and the current one).

The levels of significance for the current proposal with respect to visual amenity, air quality, noise/vibration, GHG emissions, and wind climate/pedestrian comfort, should be expected to lie somewhere between the ones established in the original EPA on the one hand, and the above-mentioned *Updated Documentation to the EIA and AA Reports*, on the other.

This Statement focuses on the impacts on visual amenity (below) and of the shadows cast by the proposed development on the surrounds (on page 18 *et seq*). As is noted above, the baseline photographs (from 12 viewpoints) and photomontages formulated on these photographs are presented in Appendix BO2. In this Statement, what the undersigned considers the more critical photomontages are compared with the ones presented in the *Updated Documentation to the EIA and AA Reports* (in 2021). The corresponding images are presented in Figure 6 to Figure 15 (on pages 8 to 17).

Visual Amenity

Figure 6 presents the 2021 montage depicting the then-proposed City Centre development as viewed from the L-Inħawi ta' Pembroke SAC. The visual significance of this viewpoint was assessed as high. The scale of the proposed cluster of buildings is substantial when compared to the existing development, and the principal receptors - namely, the residents of Pembroke - are expected to exhibit a high degree of sensitivity to such changes. Figure 7 (on page 9) subsequently illustrates the montage of the current proposal. As the latest scheme represents an intensification of the original project, it is clear that the significance of the visual impact should now be regarded as greater than that of the 2021 proposal.

Figure 8 (on page 10) depicts the view encountered by drivers, passengers, and pedestrians as they approach Paceville and Pembroke from the west via Triq il-Professur Walter Ganado. The principal receptors in this context include local residents, who, as previously noted, are likely to be highly sensitive to visual changes within their immediate environment. In addition to residents, other receptors comprise individuals employed in or managing the commercial and tourism establishments in Paceville, tourists, and Malta-based visitors who frequent the area for recreational and leisure activities. Such activities might include bathing at il-Bajja ta' San Ġorġ during the summer months, attending film screenings, dining in restaurants, and similar pursuits.

Figure 6: Photomontage of the 2021-approved development from Viewpoint 8 (L-Inħawi ta' Pembroke SAC)

Figure 7: Photomontage of the 2025 proposal from Viewpoint 8 (L-Inħawi ta' Pembroke SAC)

Figure 8: Photomontage of the 2021-approved development from Viewpoint 9 (Enemalta Pembroke Distribution Centre, Triq il-Prof W Ganado)

Figure 9: Photomontage of the 2025 proposal from Viewpoint 9 (Enemalta Pembroke Distribution Centre, Triq il-Prof W Ganado)

Figure 10: Photomontage of the 2021-approved development from Viewpoint 10 (southwest Il-Bajja ta' San Ġorġ beach)

Figure 11: Photomontage of the 2025 proposal from Viewpoint 10 (southwest Il-Bajja ta' San Ġorġ beach)

Figure 12: Photomontage of the 2021-approved development from Viewpoint 11 (Triq id-Dragunara – Paceville)

Figure 13: Photomontage of the 2025 proposal from Viewpoint 11 (Triq id-Dragunara – Paceville)

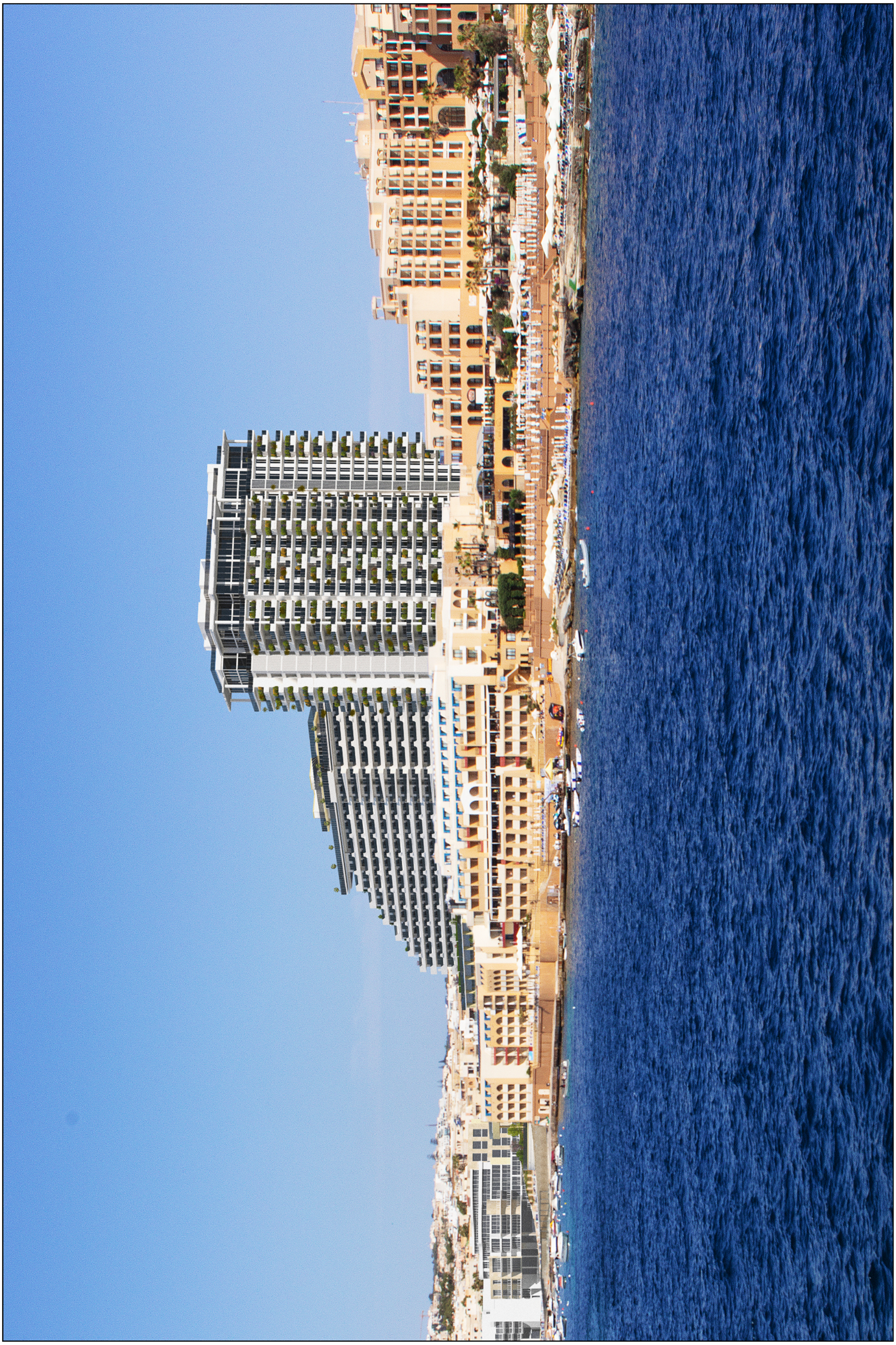

Figure 14: Photomontage of the 2021-approved development from Viewpoint 12 (Il-Ponta ta' Dragunara)

Figure 15: Photomontage of the 2025 proposal from Viewpoint 12 (Il-Ponta ta' Dragunara)

The level of sensitivity to visual change varies among these groups:

- Local residents are generally the most sensitive, as alterations to the visual landscape can significantly affect their daily lives, sense of place, and overall well-being.
- Employees and business managers may exhibit moderate sensitivity. While their primary concern is often commercial viability, significant changes to the visual environment could impact the attractiveness of the area to customers and, by extension, business performance.
- Tourists and recreational visitors tend to display a lower to moderate level of sensitivity. While some may be less affected by changes to the skyline, others—particularly those drawn by the area's unique character or scenic qualities—may be more sensitive to such developments.

Given the range of receptors and the prominence of the visual changes proposed, the significance of the impact in this view was assessed as high.

Figure 9 (on page 11) presents a montage of the revised development proposal. As with the previous assessment, the significance of the visual impact is anticipated to be greater, owing to the increased scale of the proposed buildings. In both images, glimpses of the Villa Rosa development - approved in 2018 (PA, 2012) - are visible. It is important to note that this particular development has not yet been constructed, and the policies within the *North Harbours Local Plan* relating to Villa Rosa are currently under review (PA, 2025). This evolving policy context may further influence the assessment of visual impact in the future.

Figure 10 and Figure 11 (pages 12 and 13) present an assessment of the view from the sandy beach at Il-Bajja ta' San Ġorġ, specifically from the vicinity of the Paranga beach facility, for both the 2021 scheme and the current proposal, respectively. In this particular vista, the middle ground is somewhat dominated by the Villa Rosa development, while the City Centre forms a prominent and imposing backdrop. The receptors in this context are similar to those previously identified; however, the majority are likely to be tourists and recreational visitors from other parts of Malta. The 2021 development was judged to have a high level of visual significance, and the current proposal is expected to have a greater impact.

Figure 12 (on page 14) and Figure 13 (on page 15) illustrate how the residential towers (TW-A and TW-B) of both the 2021-approved City Centre development and the newly proposed scheme dominate the view from this section of Triq id-Dragunara. From this vantage point, the towers command the centre ground, forming a focal point in the landscape. The principal receptors in this area are residents of St George's Park, tourists staying in nearby hotels, and recreational visitors. The visual impact of the 2021 development was already assessed as highly significant; with the current proposal, this impact is expected to be more prominent.

Figure 14 and Figure 15 (on pages 16 and 17) capture a panoramic view from il-Ponta tad-Dragonara, featuring the two Corinthia hotels on the northern headland of Il-Bajja ta' San Ġorġ, alongside the City Centre development and Villa Rosa. The City Centre emerges as the dominant element due to its scale and vertical prominence. The main receptors would be the following:

- Westin Dragonara Resort patrons: Including both residents and short-term visitors.
- Dragonara Casino visitors: A diverse group whose perceptions may vary.
- Employees: Likely to have repeated exposure to the vista.

As the case is with the other critical views discussed above, visual impact of the 2021 development was deemed to be highly significant with that of the current proposal being judged to be higher.

Shadows

The images in the following Figure 16 to Figure 63 present the impact of the sun path for the 21st of the following months

- March (Figure 16 on page 19 to Figure 27 on page 24),
- June (Figure 28 on page 25 to Figure 39 on page 30),
- September (Figure 40 on page 31 to Figure 51 on page 36), and
- December (Figure 52 on page 37 to Figure 63 on page 42).

Stills for the shadows were taken at hourly intervals between 07:00 and 18:00.

Table 2 (on page 43) provides an indication of the periods during the days identified above, when the residential developments close to City Centre and the St George's Bay Hotel would be affected by shadows cast by the currently proposed development.

Figure 16: Sun path assessment | March 07:00

Figure 17: Sun path assessment | March 08:00

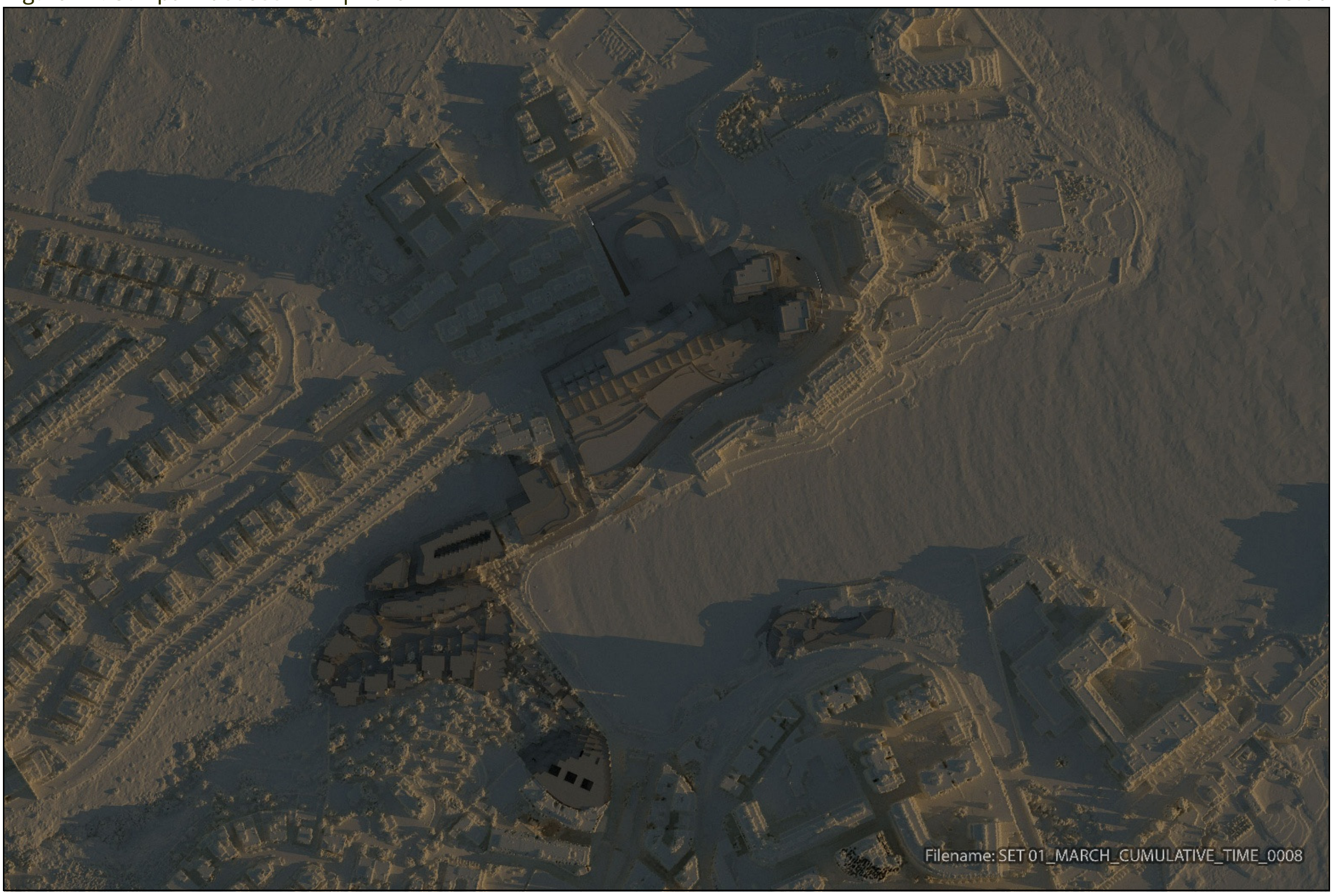

Figure 18: Sun path assessment | March 09:00

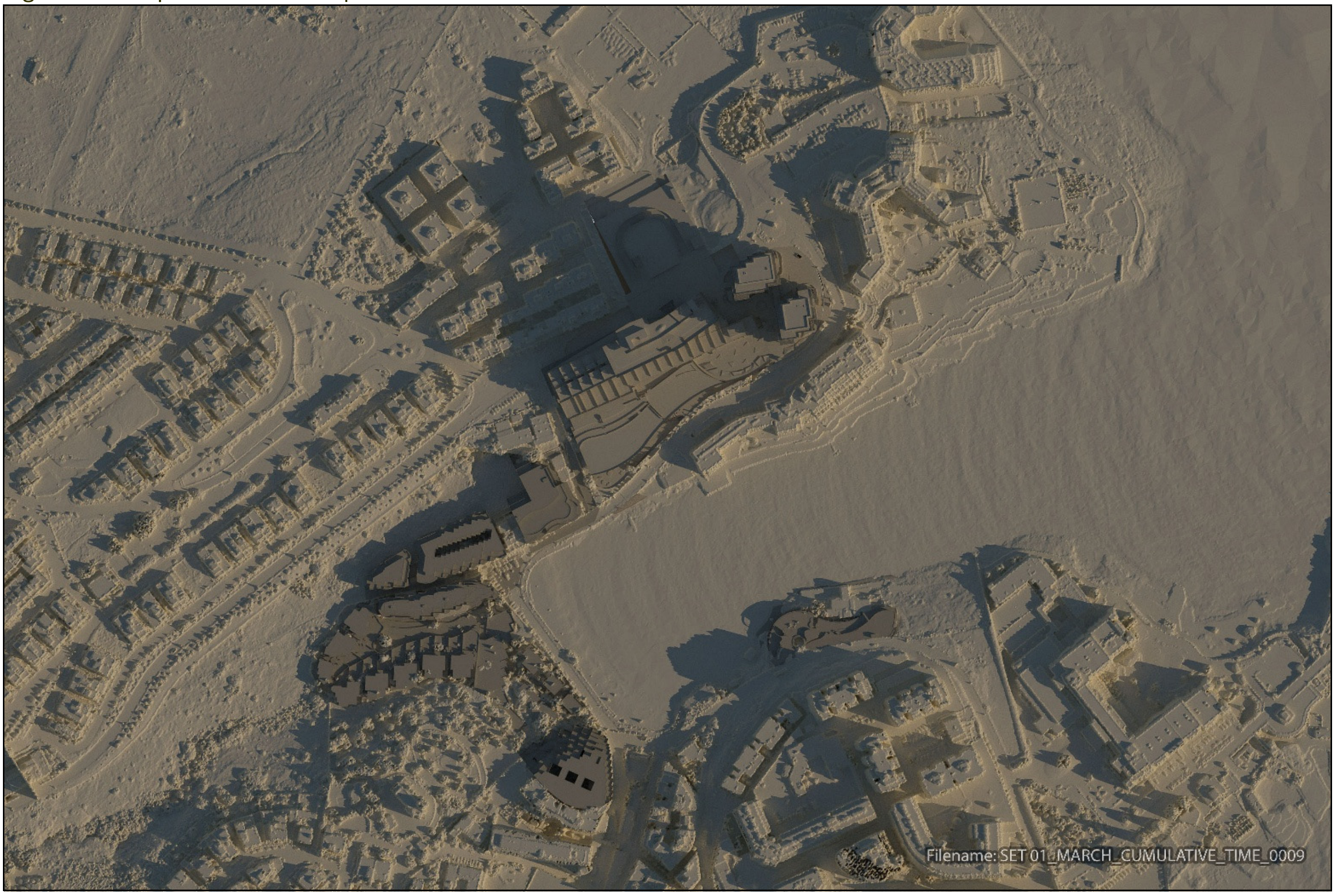

Figure 19: Sun path assessment | March 10:00

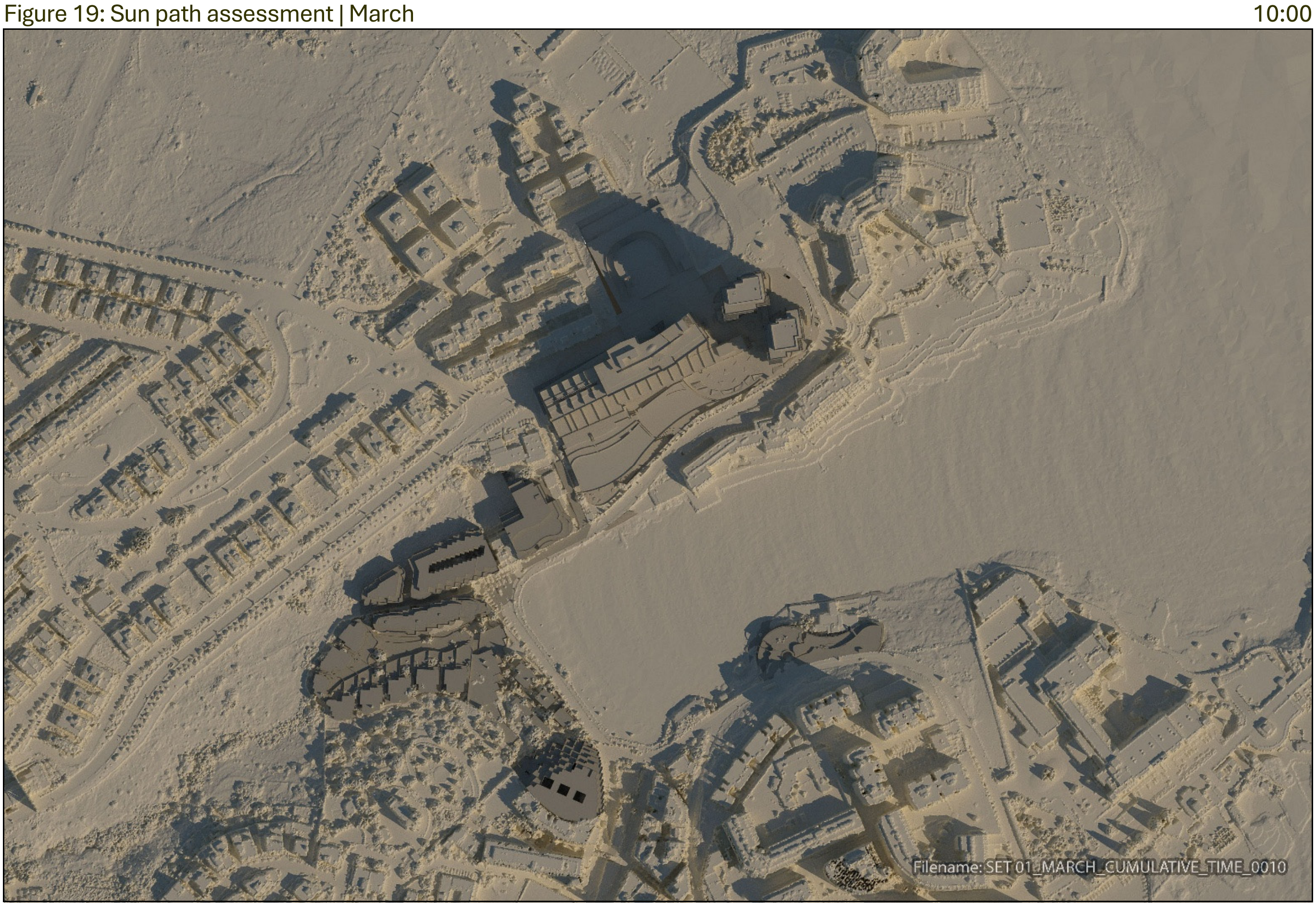

Figure 20: Sun path assessment | March 11:00

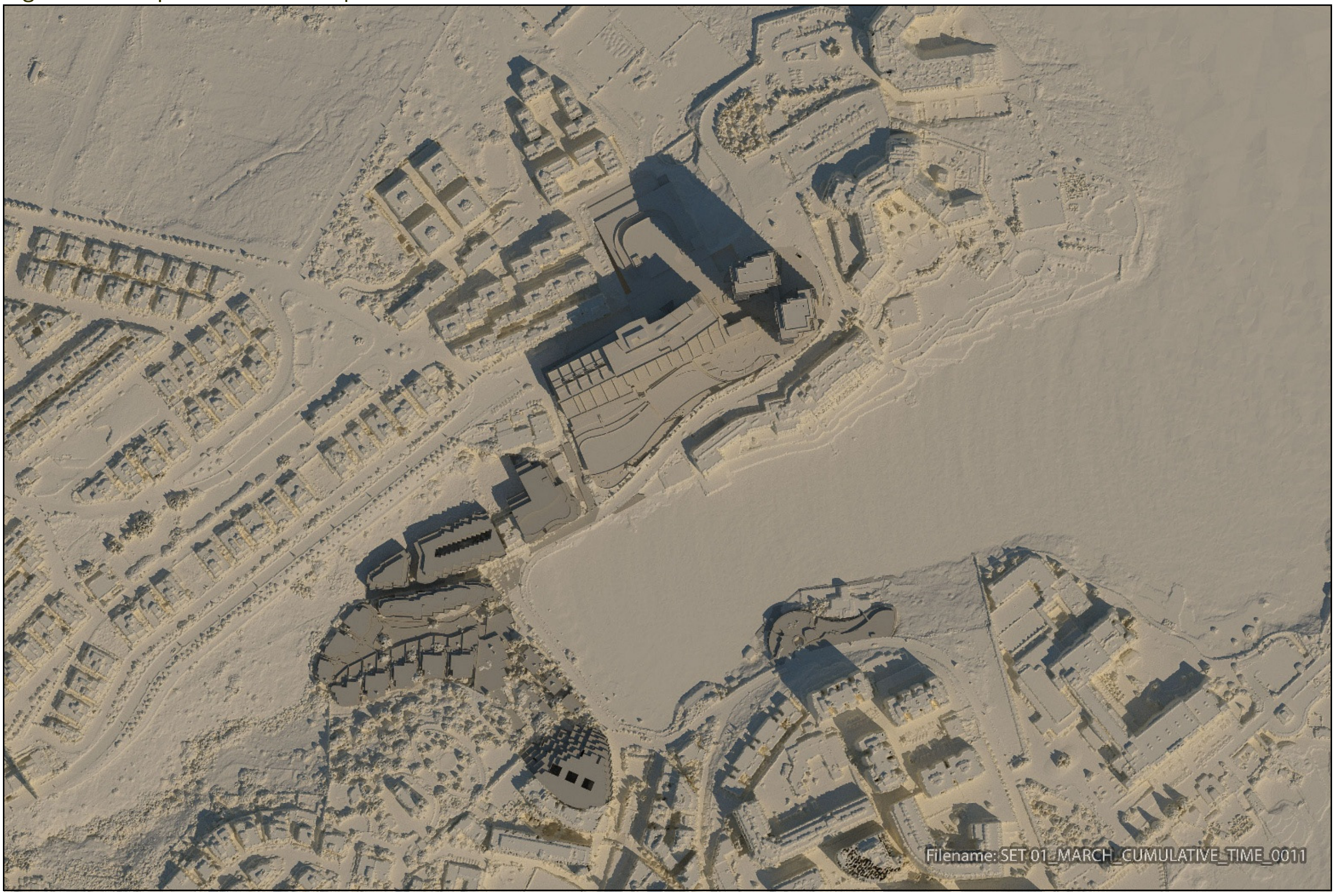

Figure 21: Sun path assessment | March 12:00

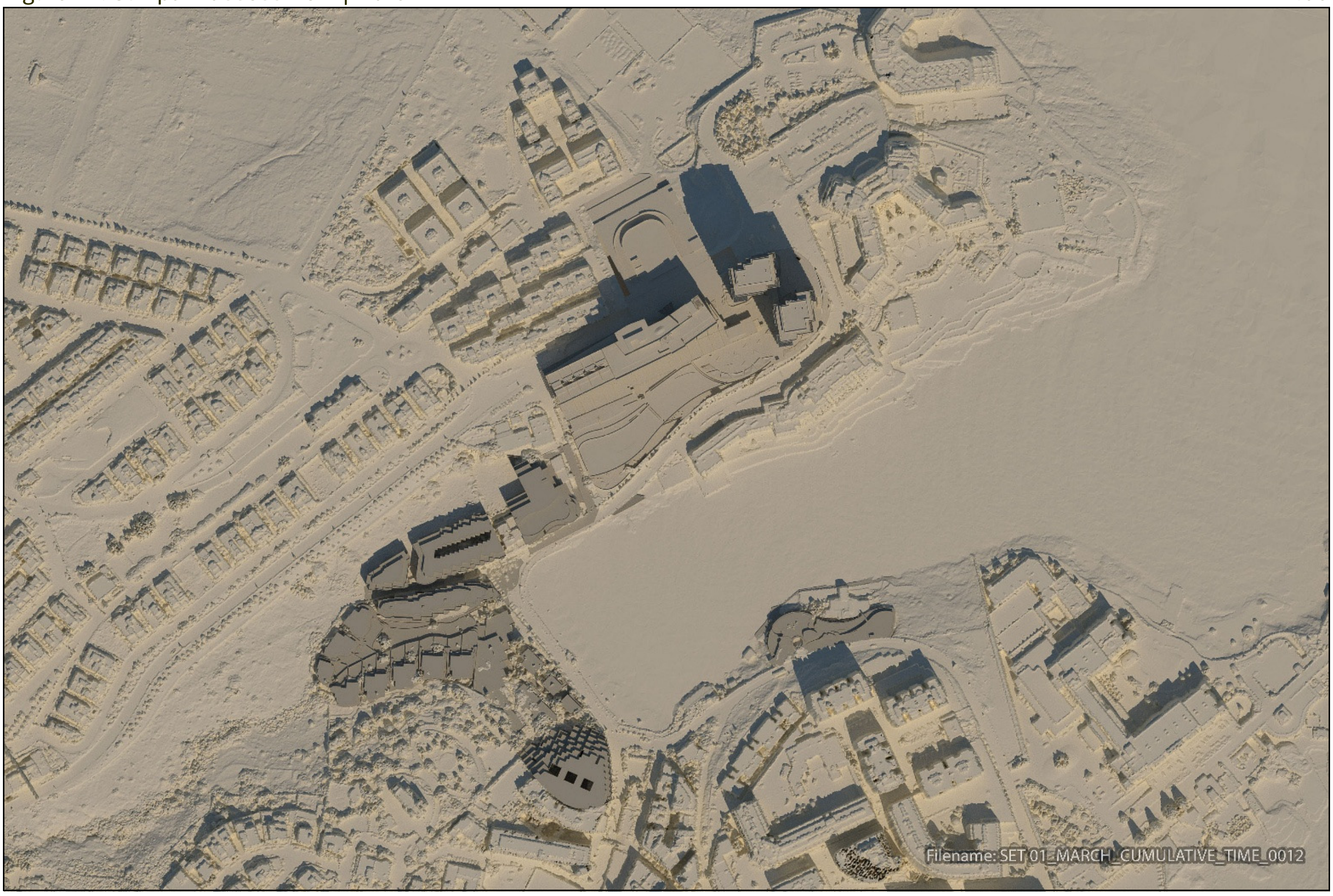

Figure 22: Sun path assessment | March 13:00

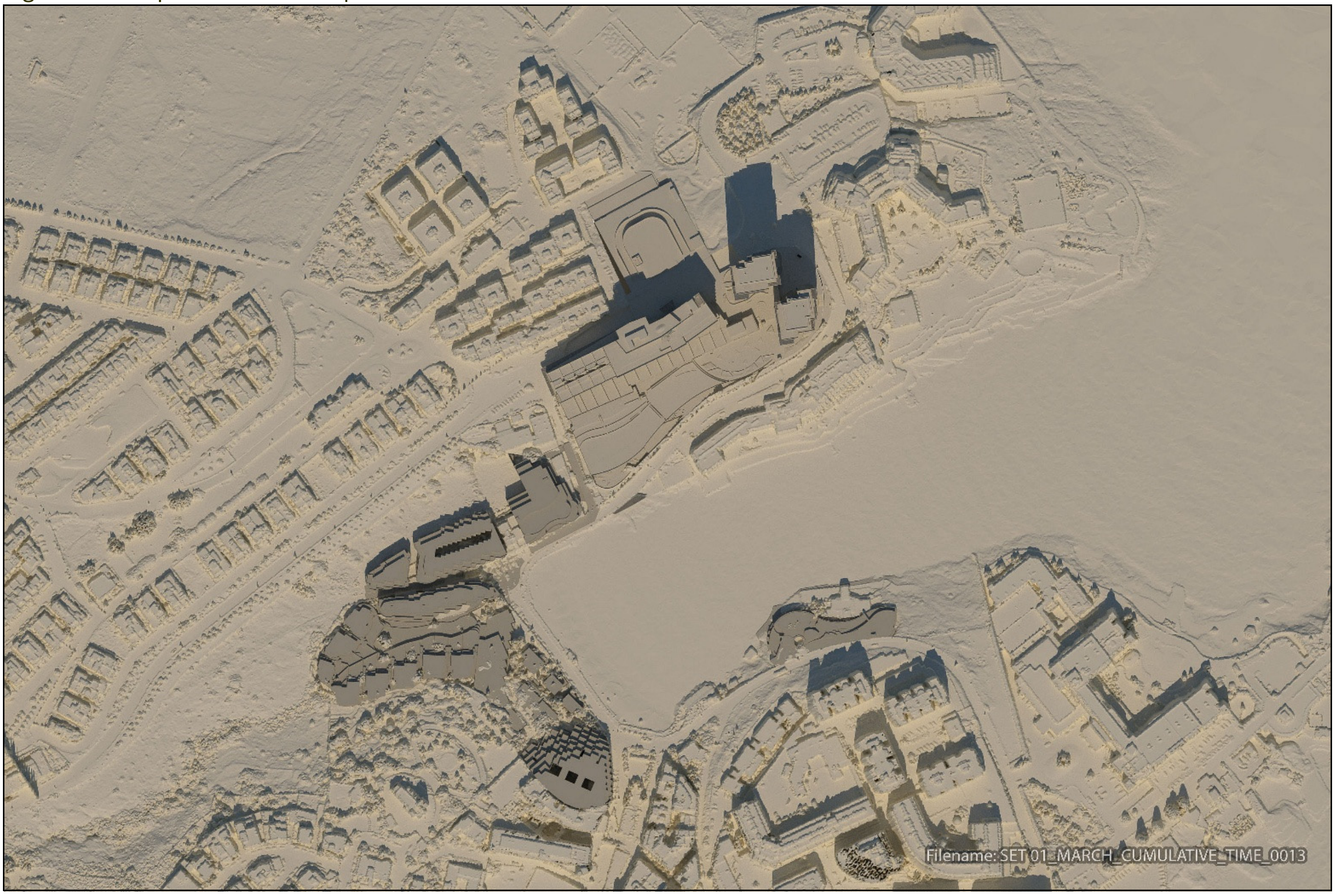

Figure 23: Sun path assessment | March 14:00

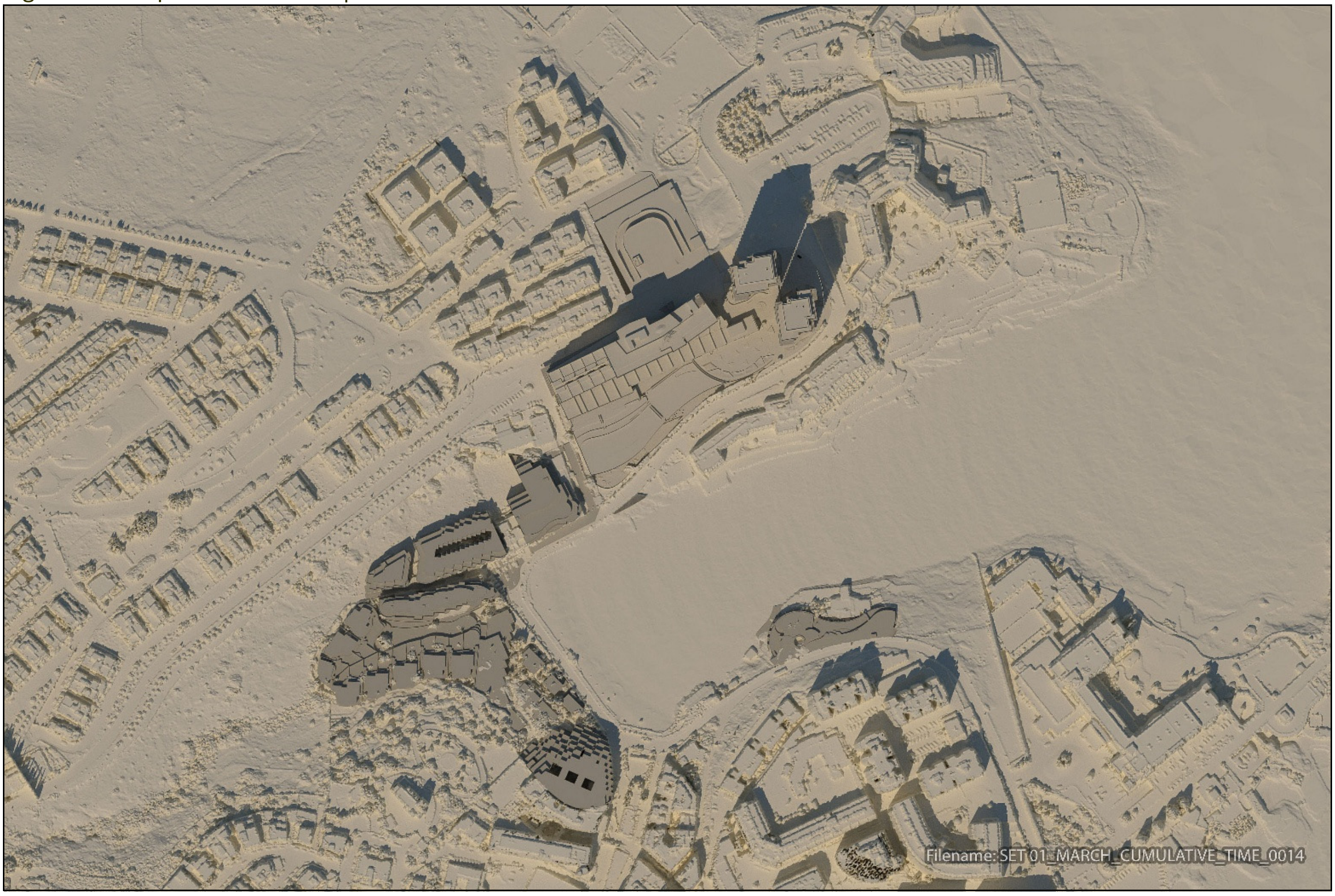

Figure 24: Sun path assessment | March 15:00

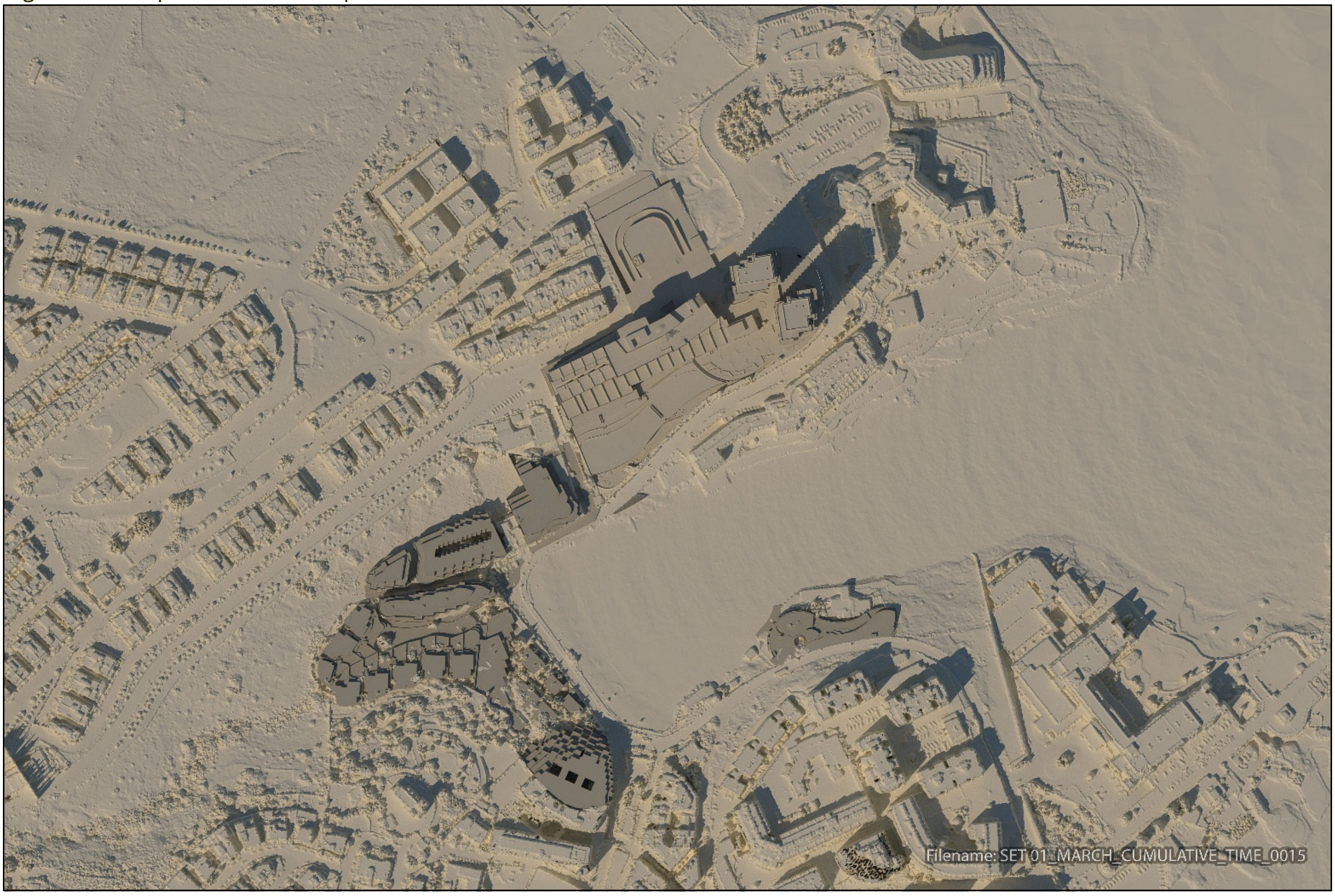

Figure 25: Sun path assessment | March 16:00

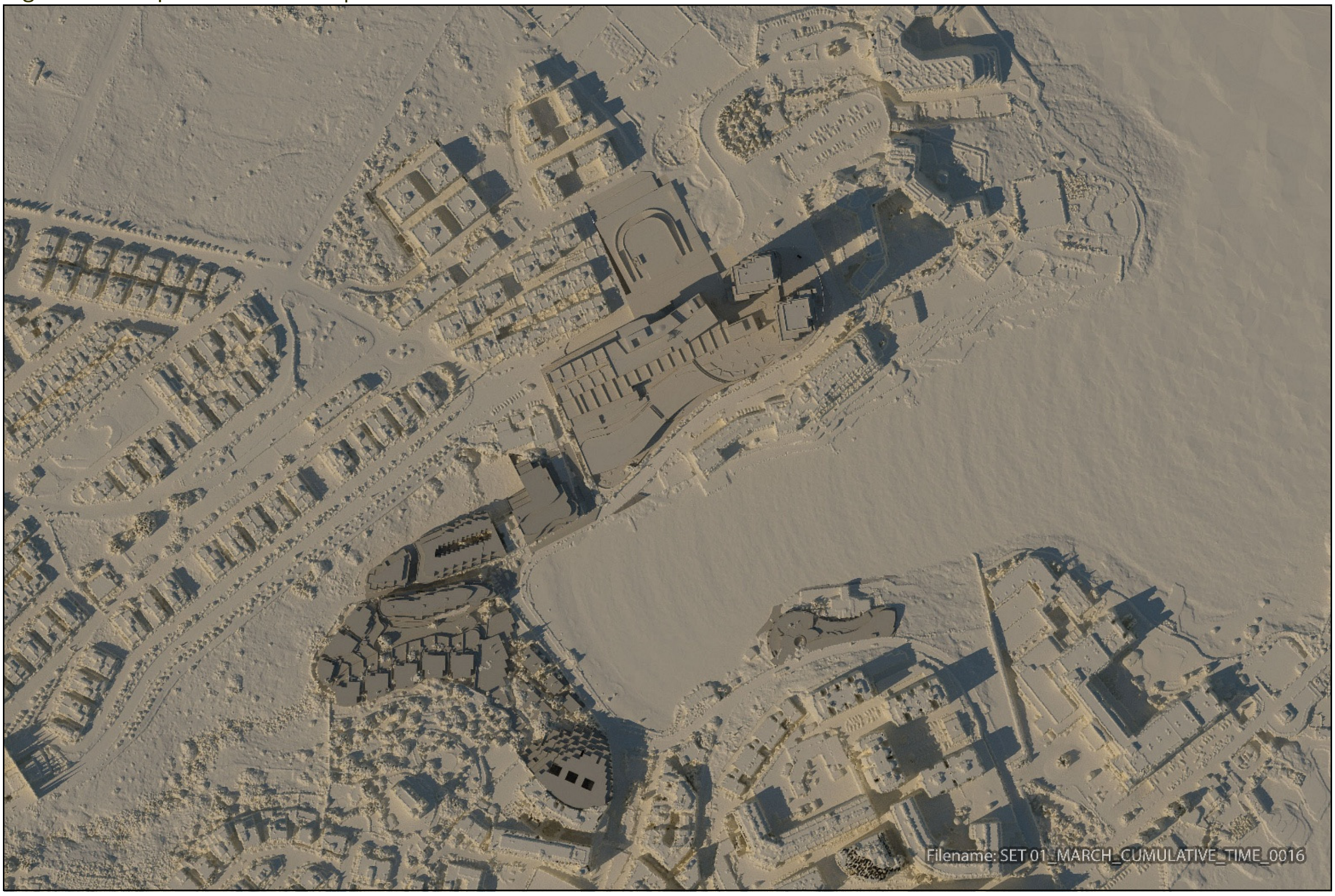

Figure 26: Sun path assessment | March 17:00

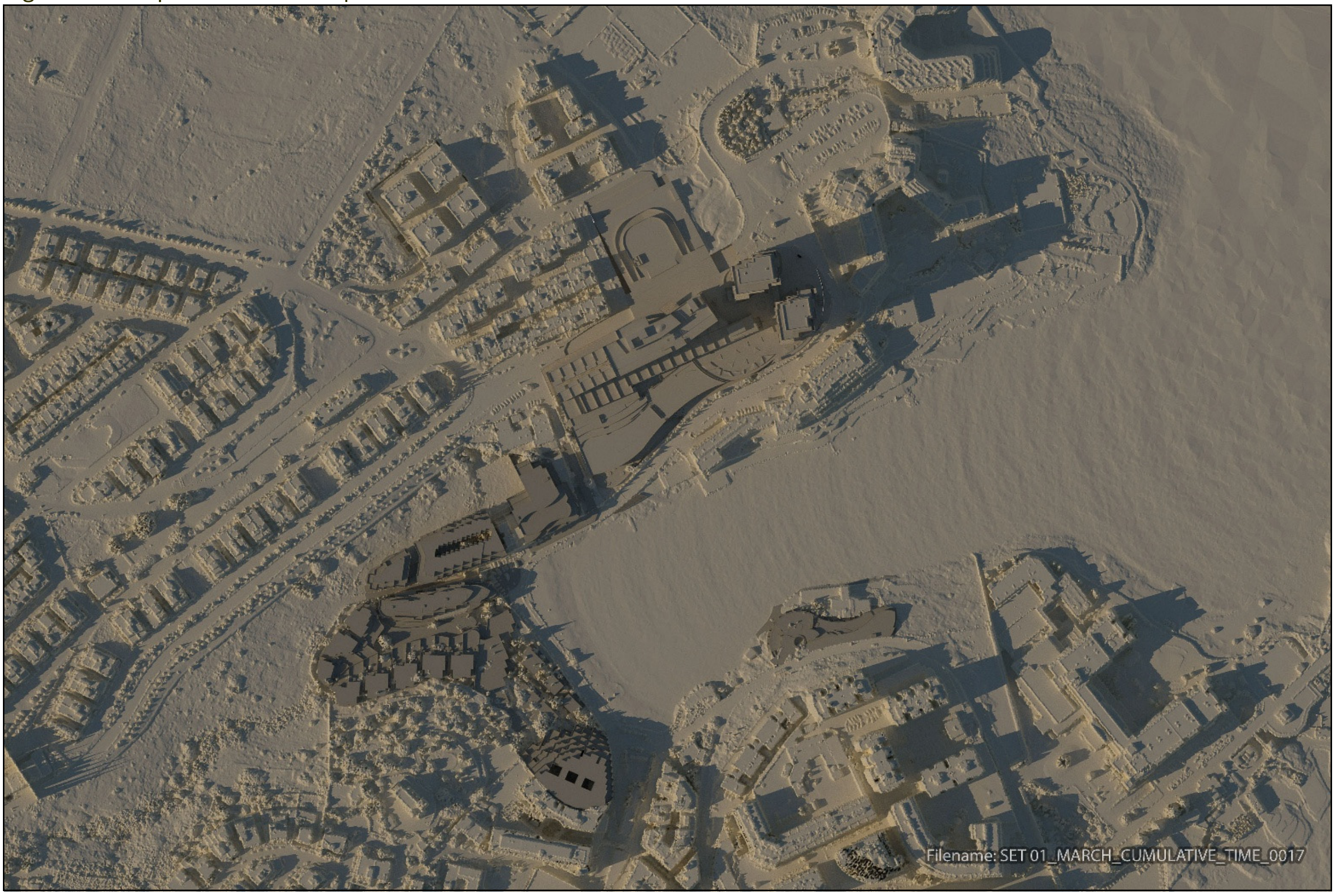

Figure 27: Sun path assessment | March 18:00

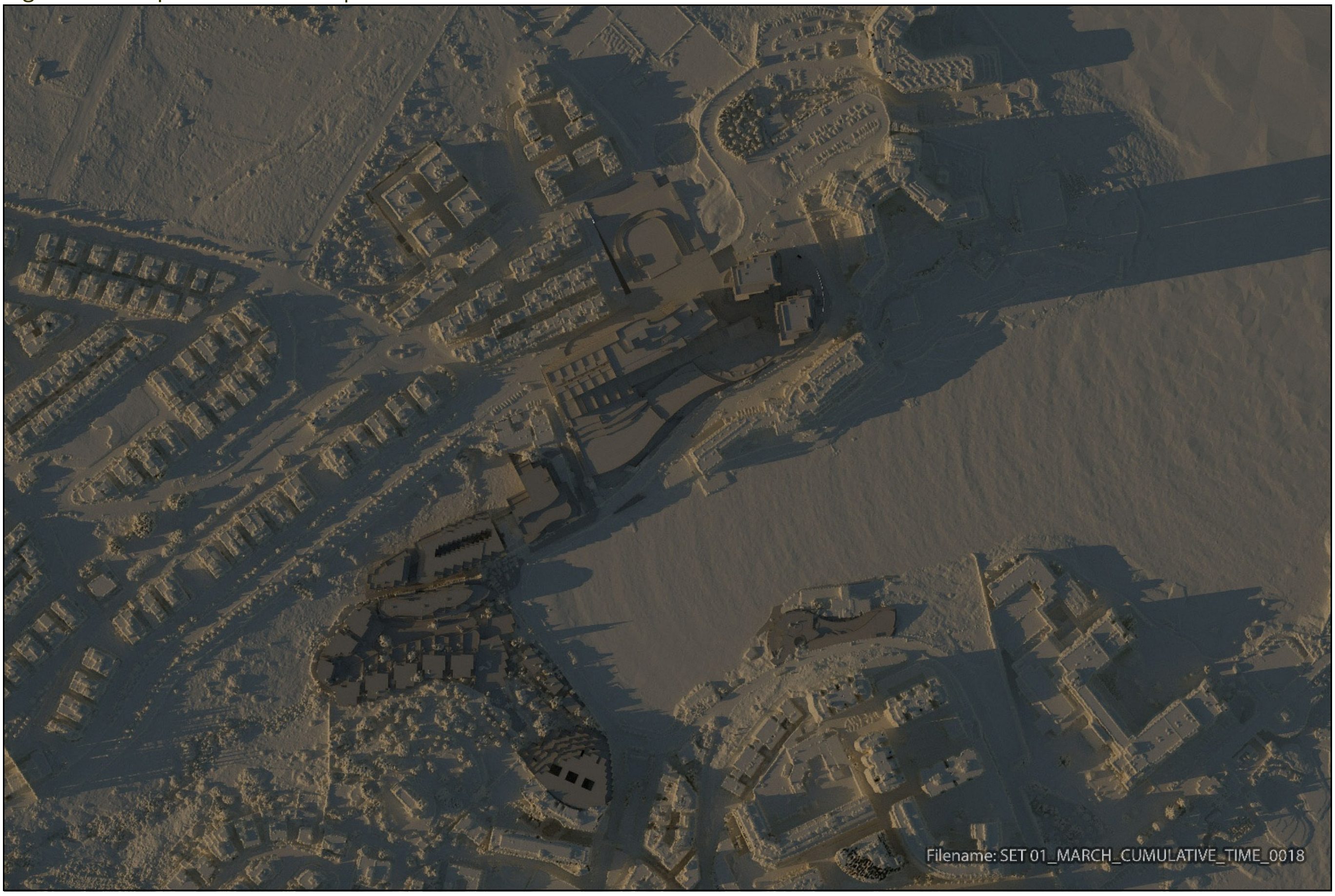

Figure 28: Sun path assessment | June 07:00

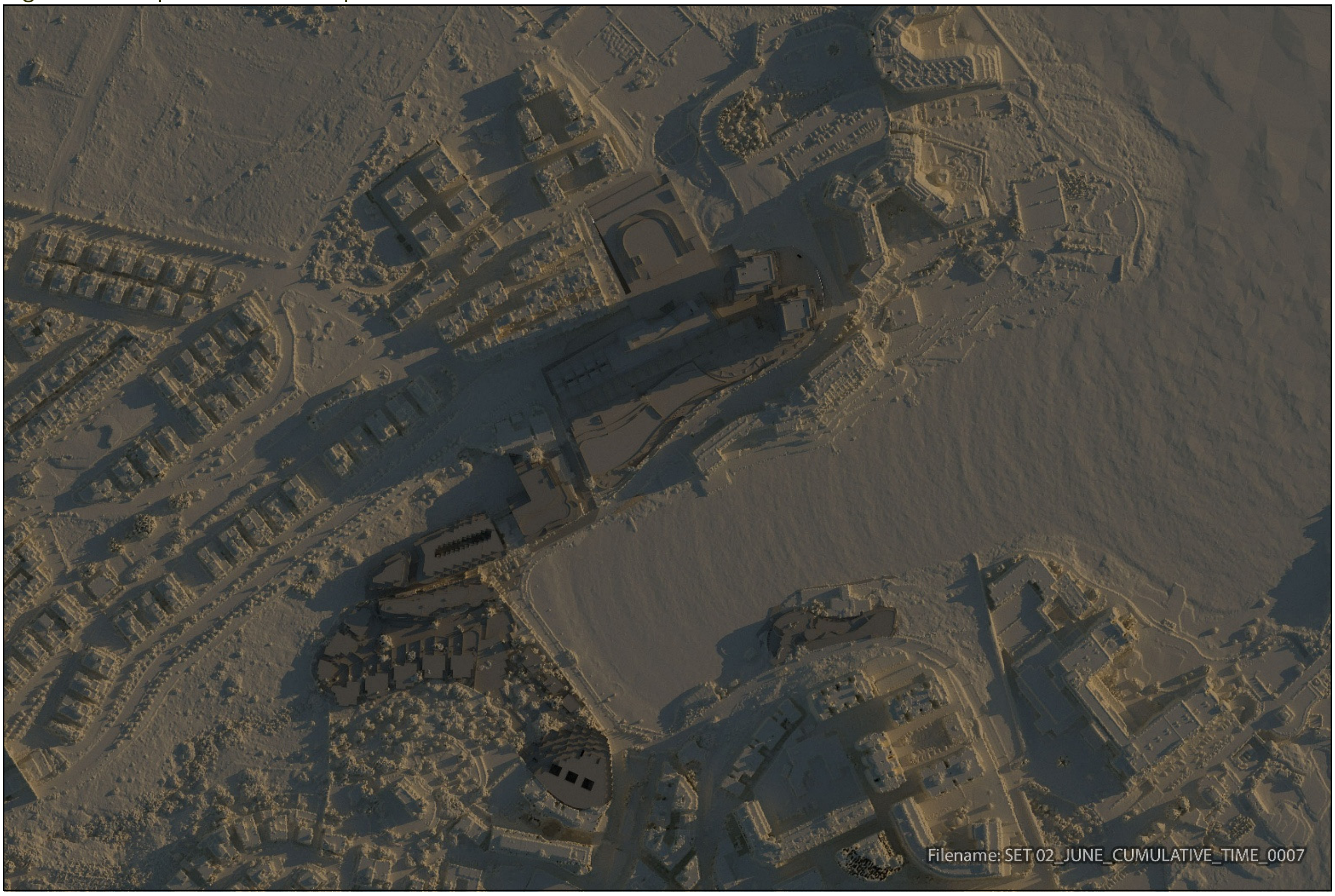

Figure 29: Sun path assessment | June 08:00

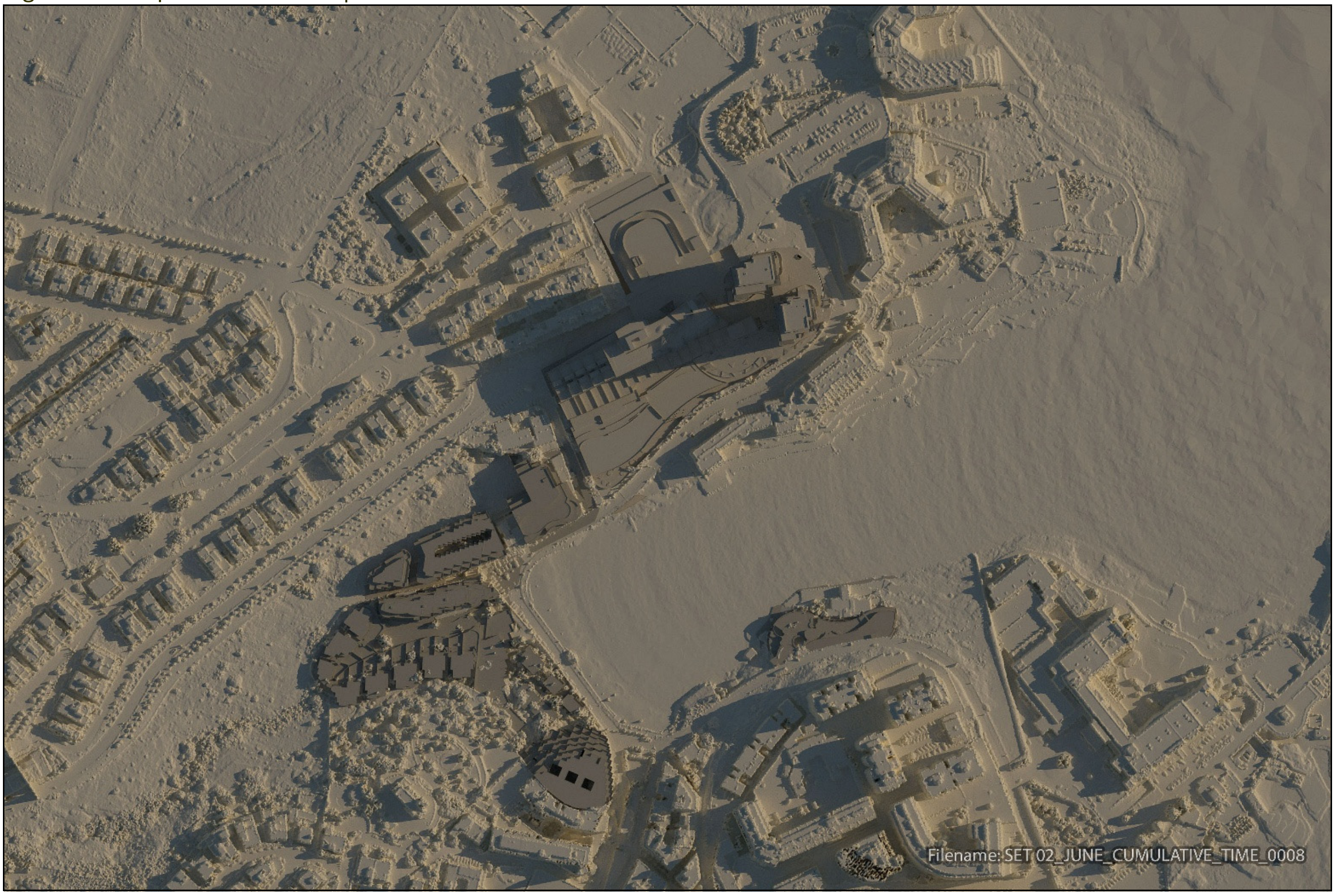

Figure 30: Sun path assessment | June 09:00

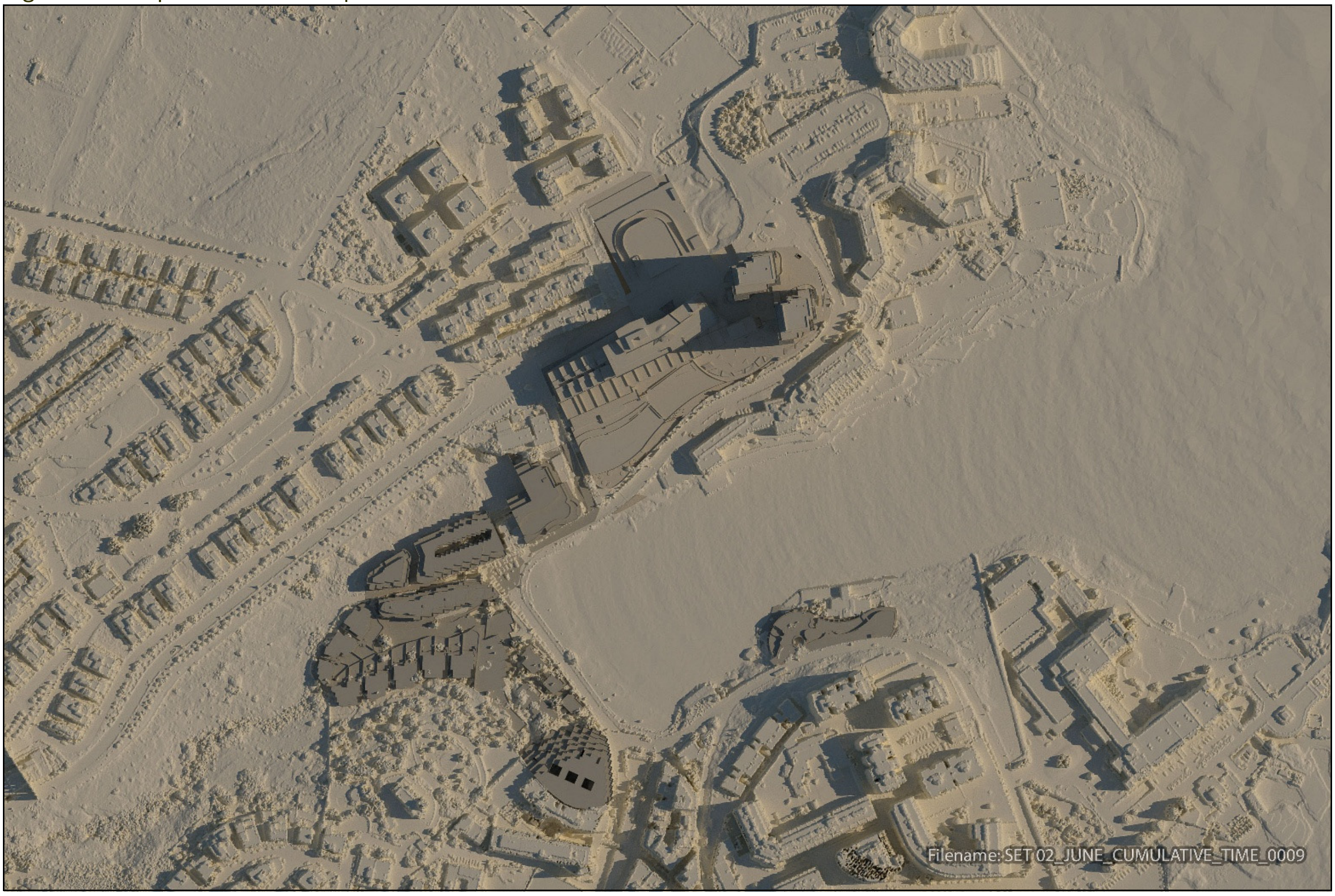

Figure 31: Sun path assessment | June 10:00

Figure 32: Sun path assessment | June 11:00

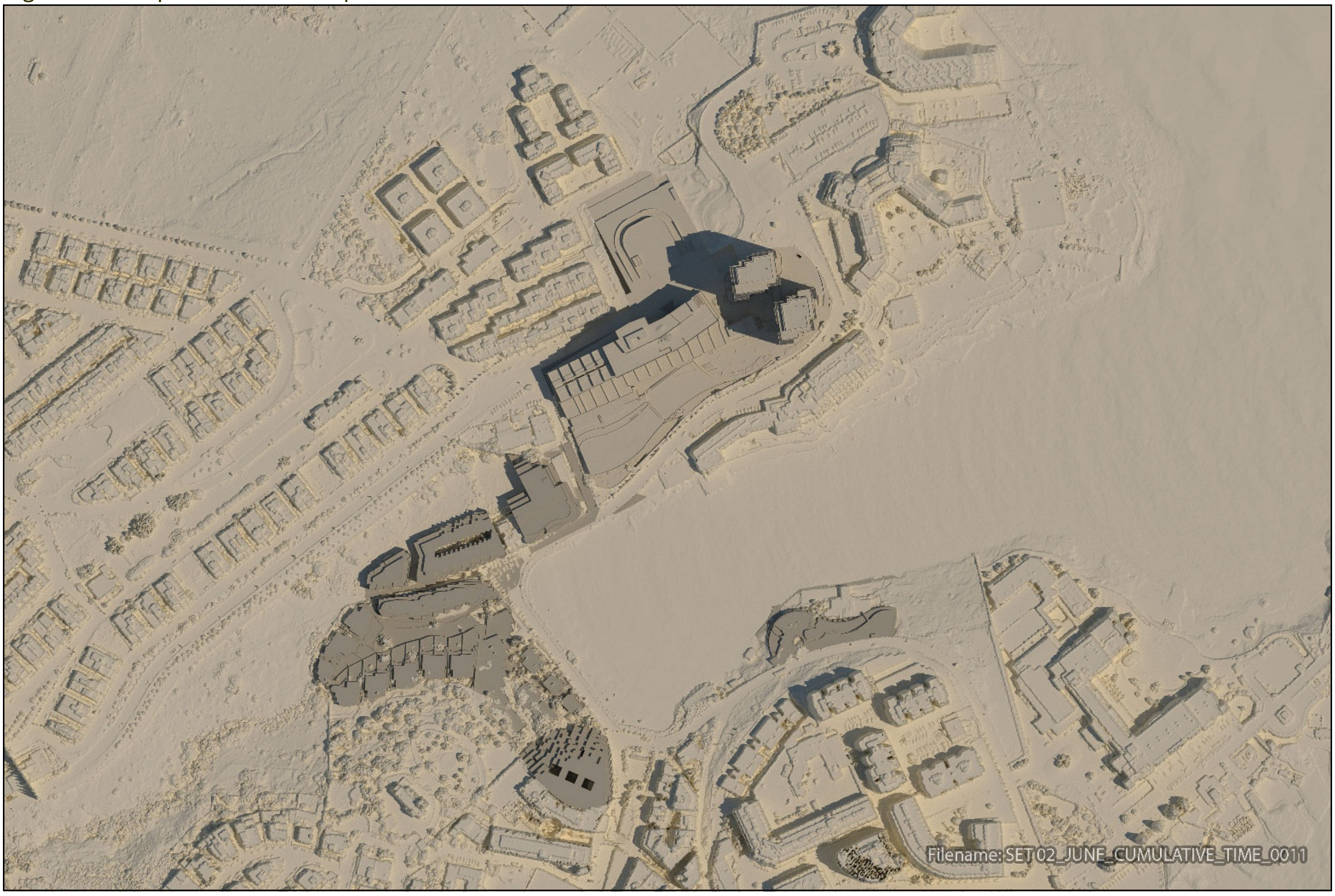

Figure 33: Sun path assessment | June 12:00

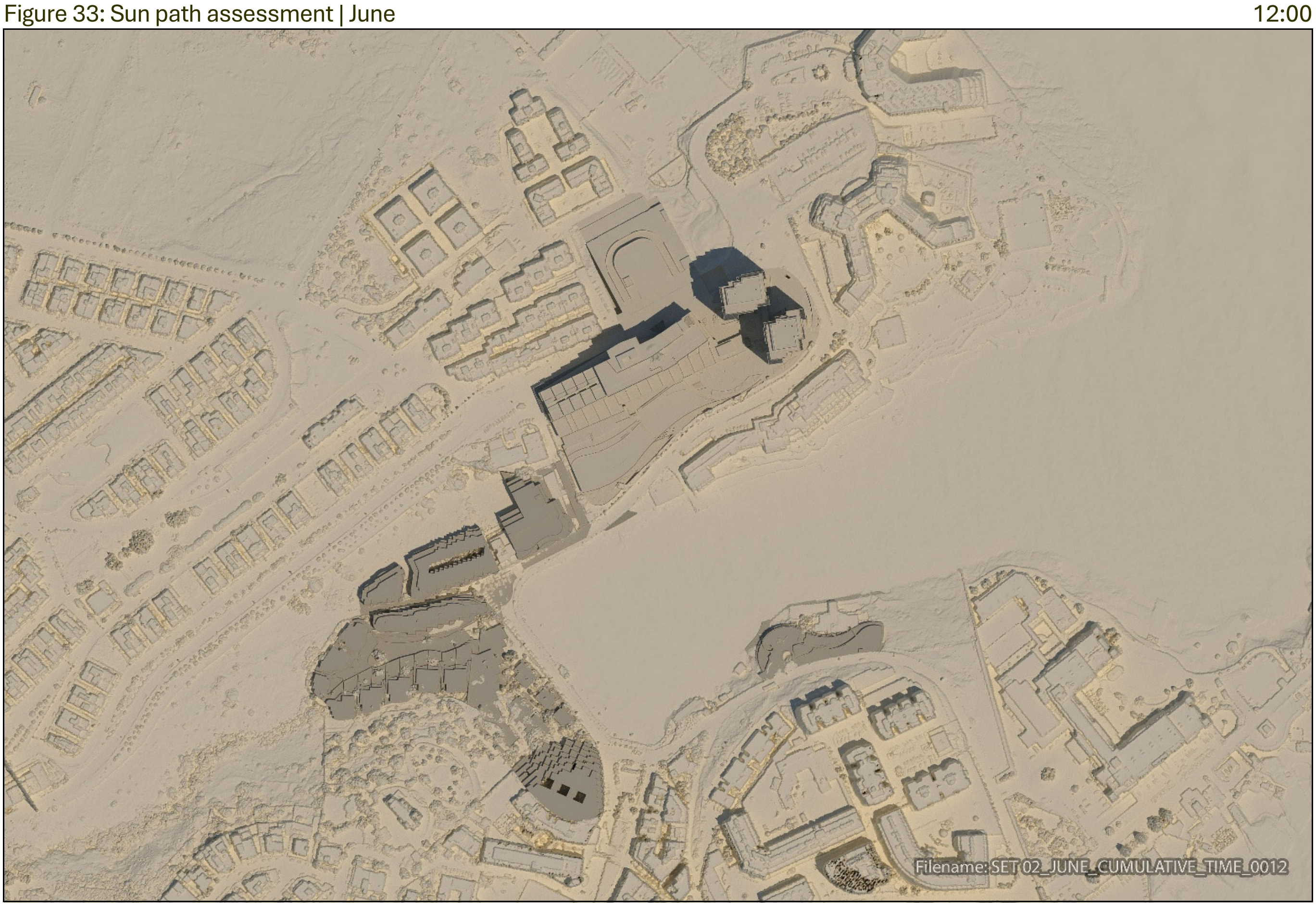

Figure 34: Sun path assessment | June 13:00

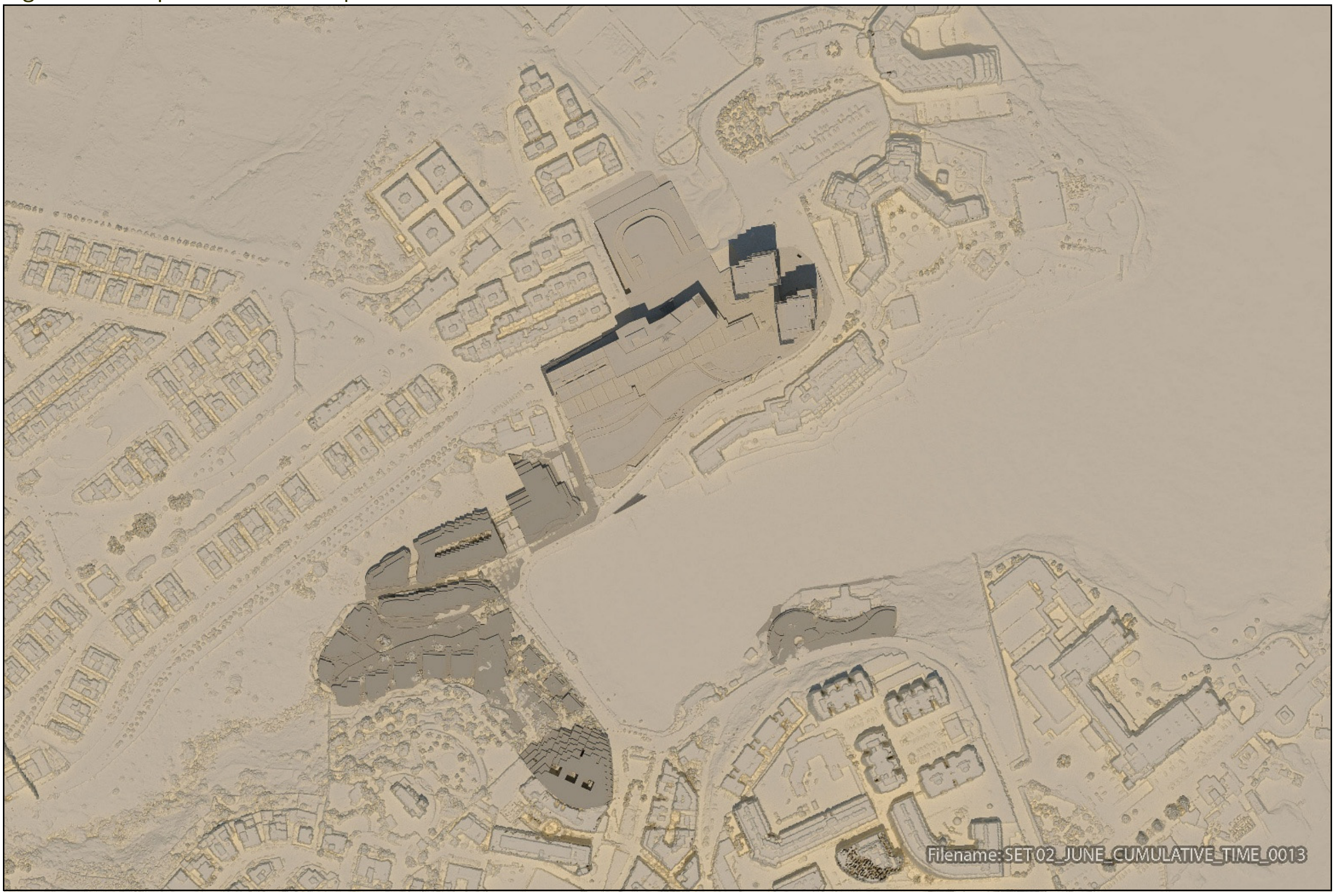

Figure 35: Sun path assessment | June 14:00

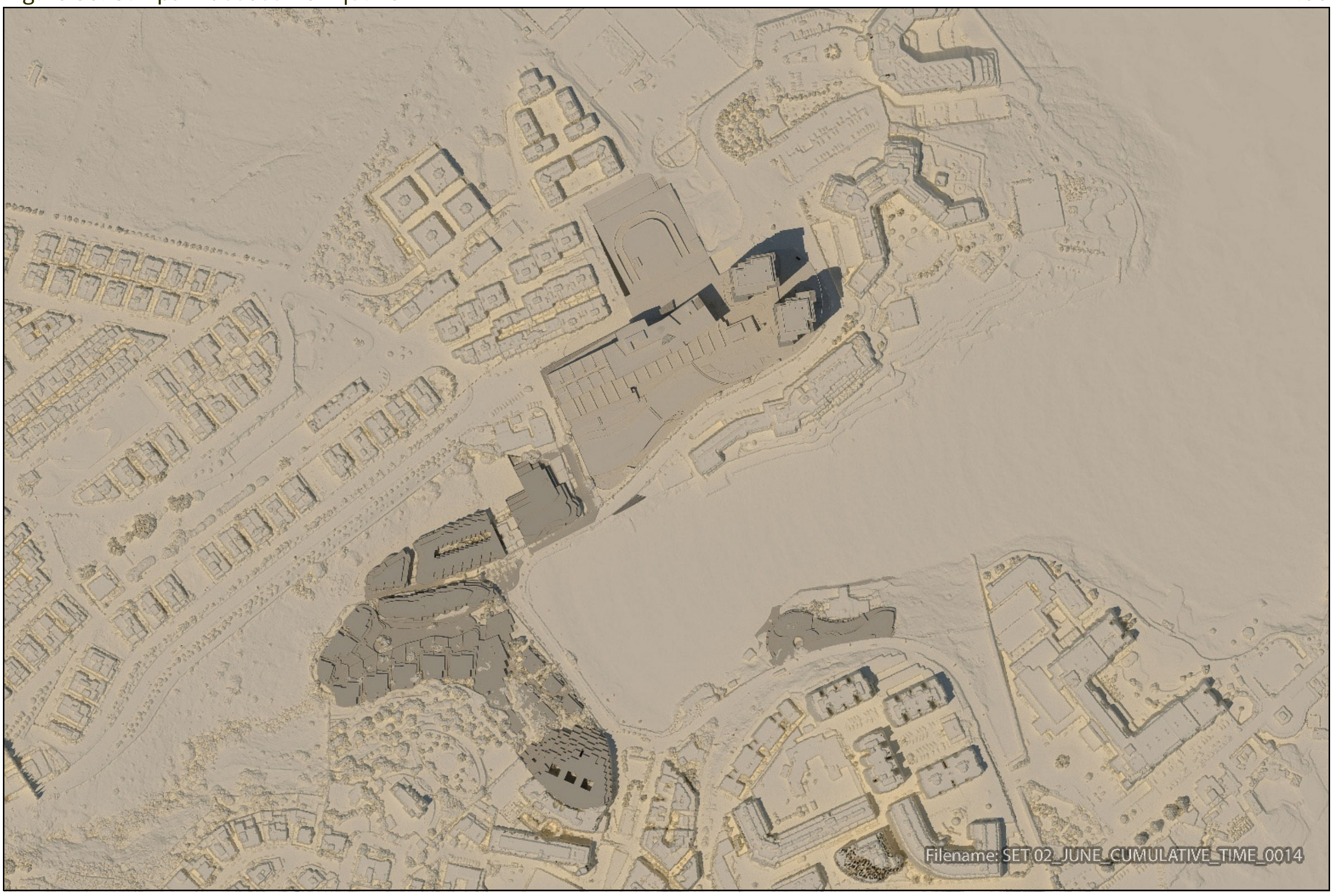

Figure 36: Sun path assessment | June 15:00

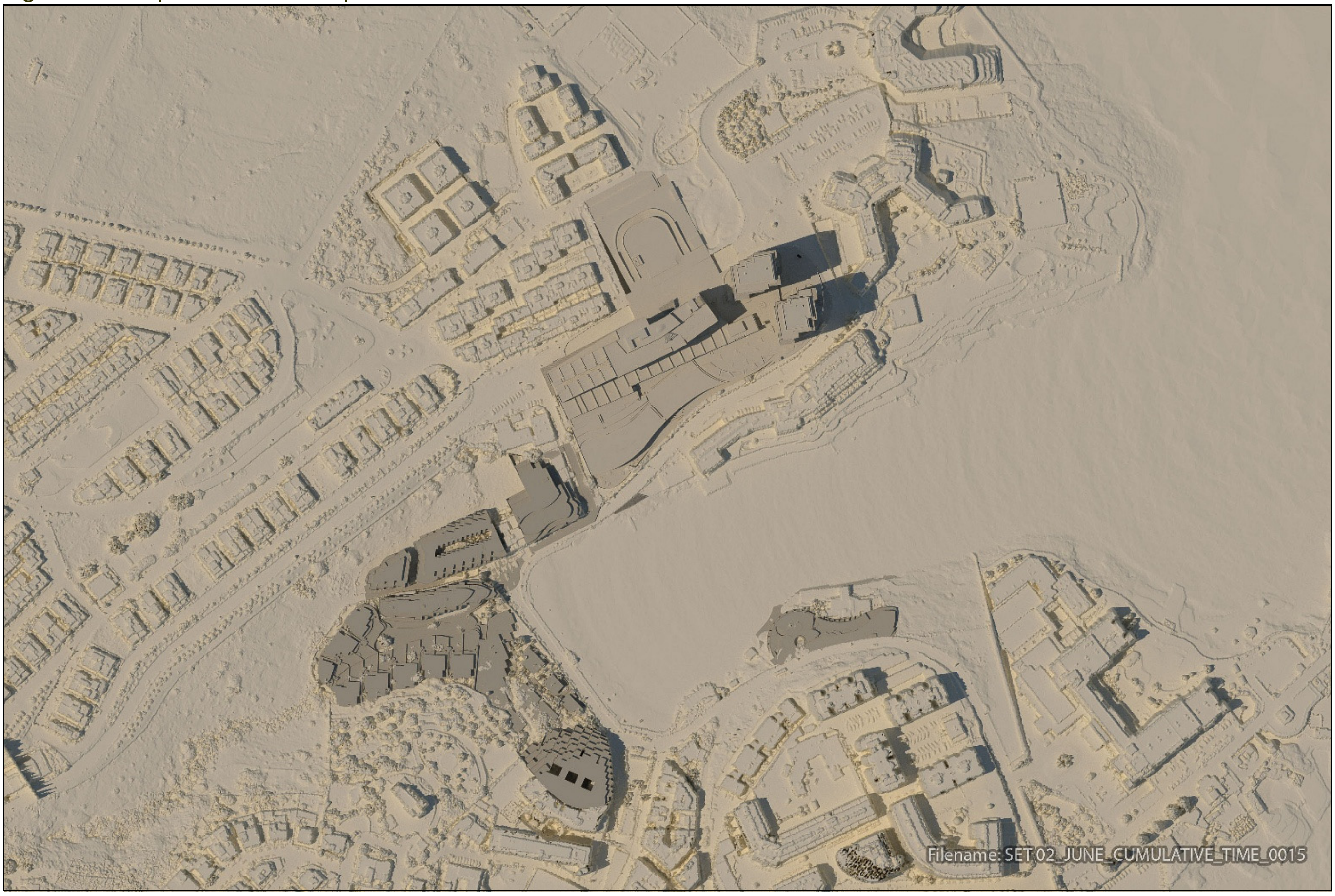

Figure 37: Sun path assessment | June 16:00

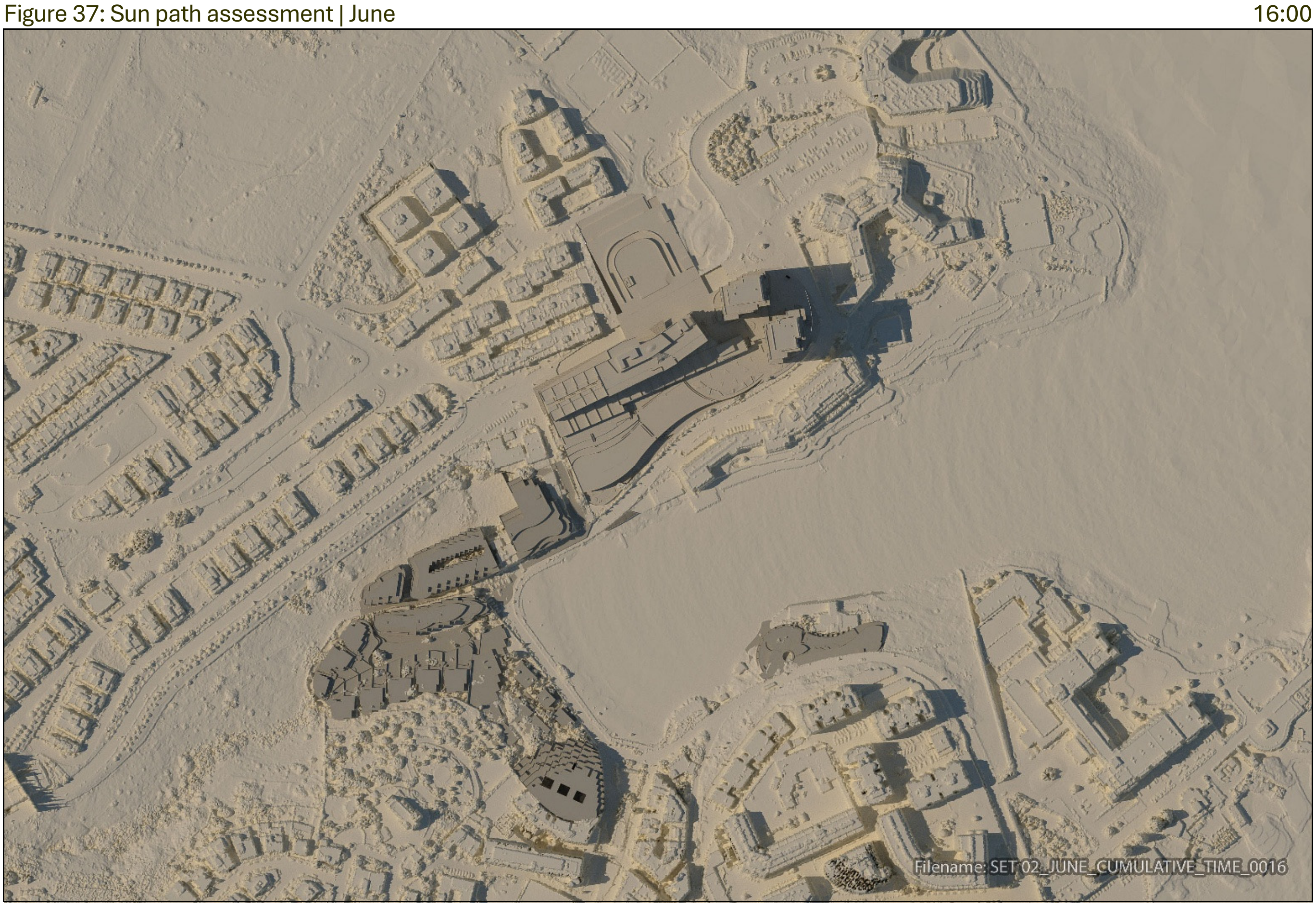

Figure 38: Sun path assessment | June 17:00

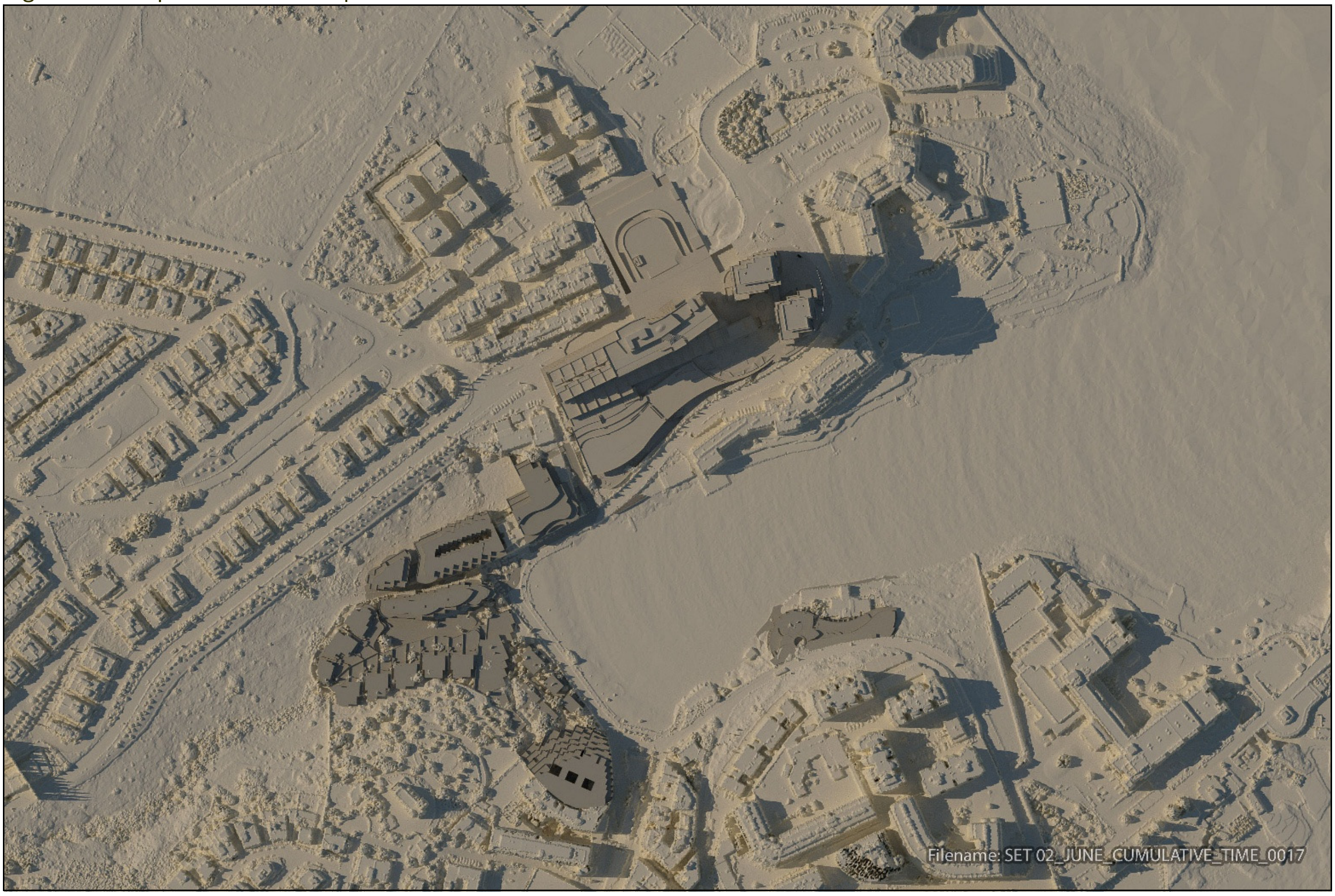

Figure 39: Sun path assessment | June 18:00

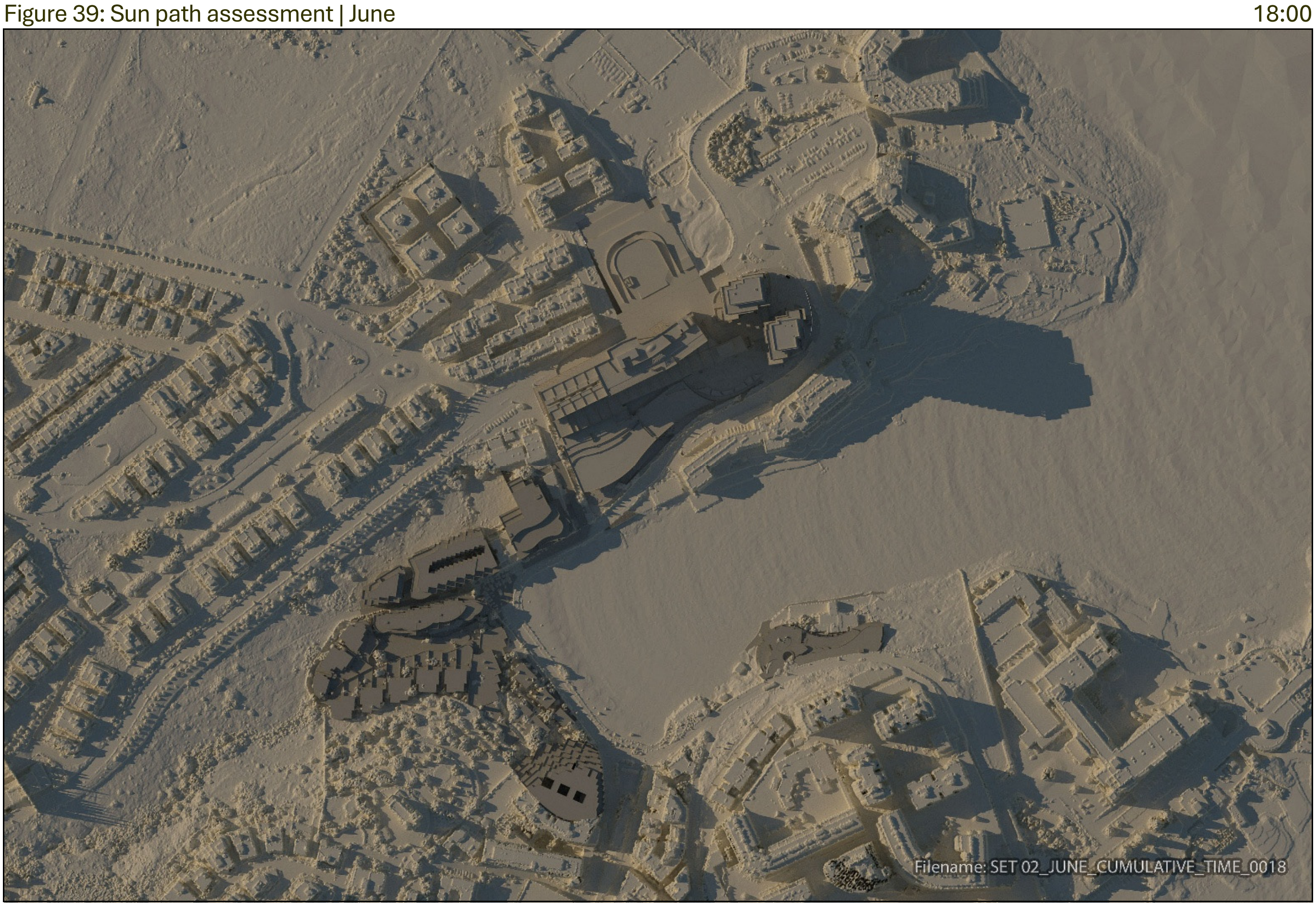

Figure 40: Sun path assessment | September 07:00

Figure 41: Sun path assessment | September 08:00

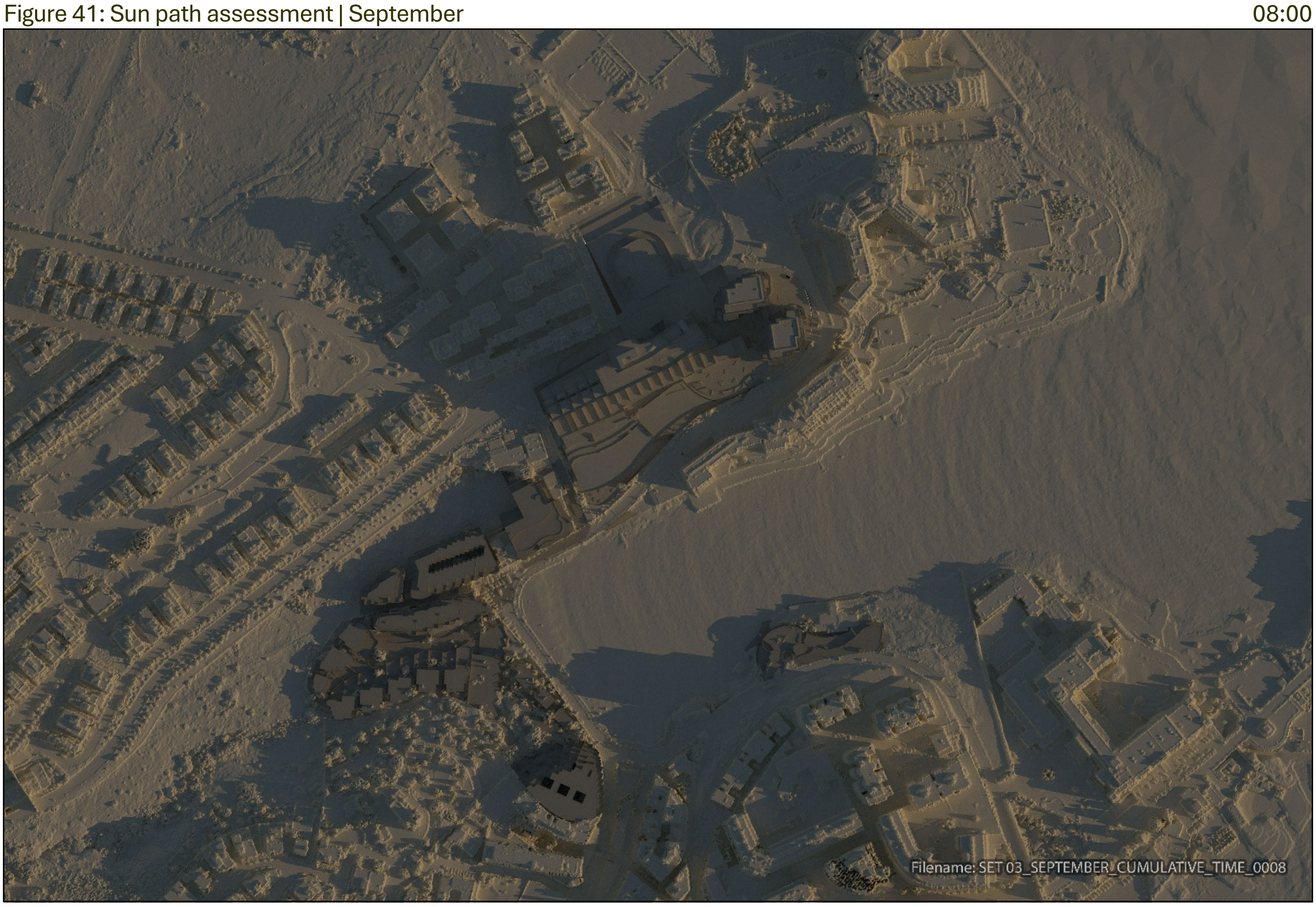

Figure 42: Sun path assessment | September 09:00

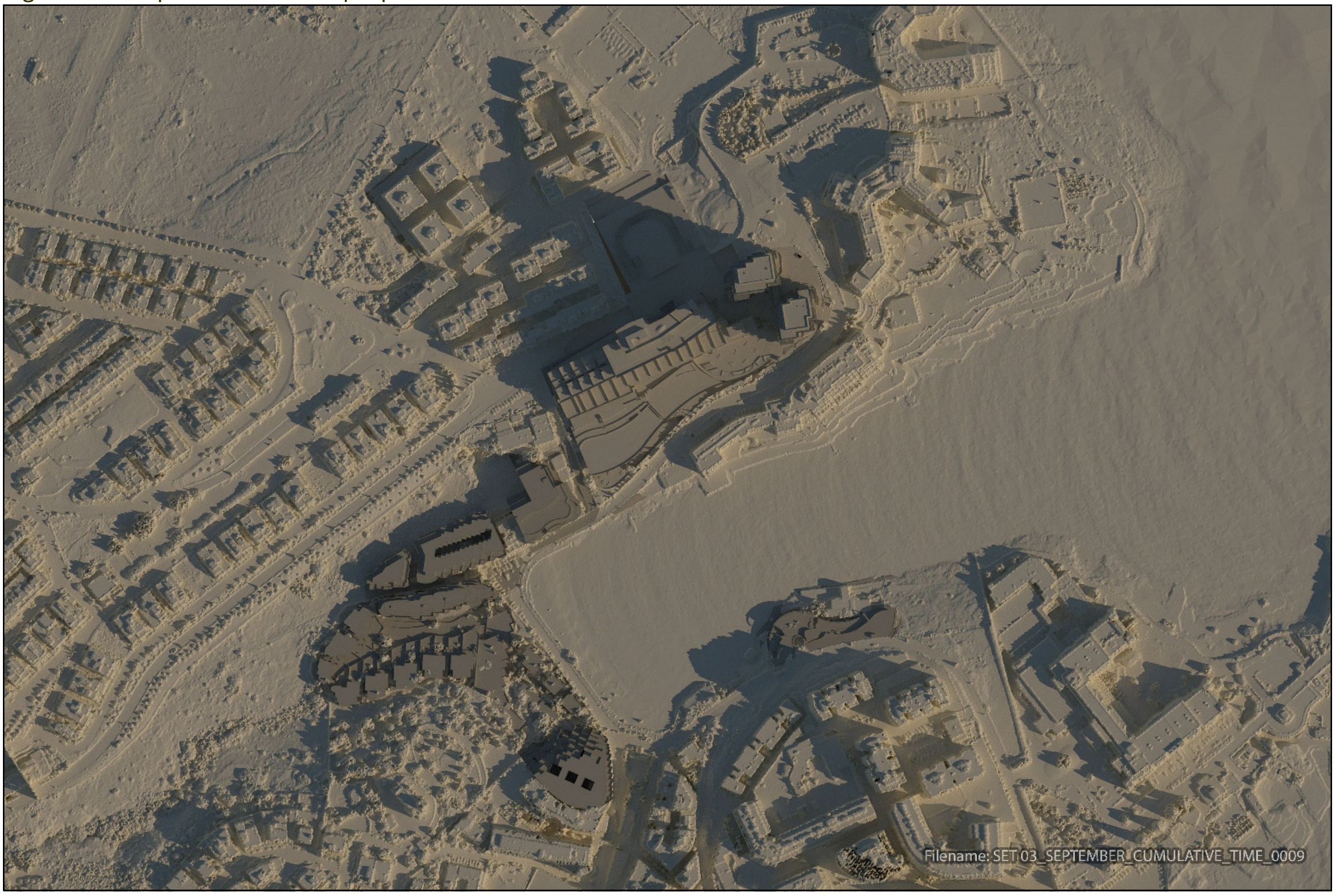

Figure 43: Sun path assessment | September 10:00

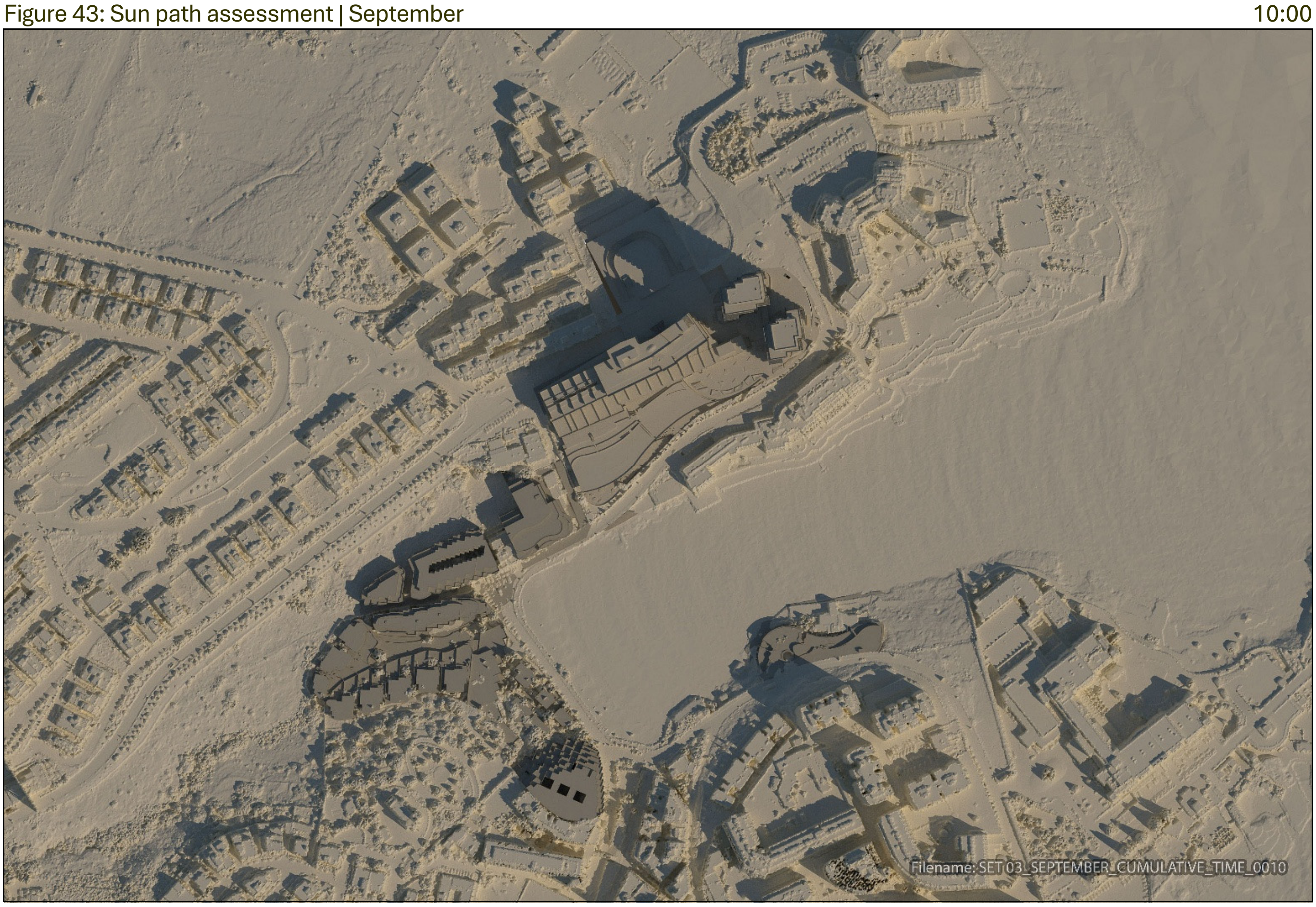

Figure 44: Sun path assessment | September 11:00

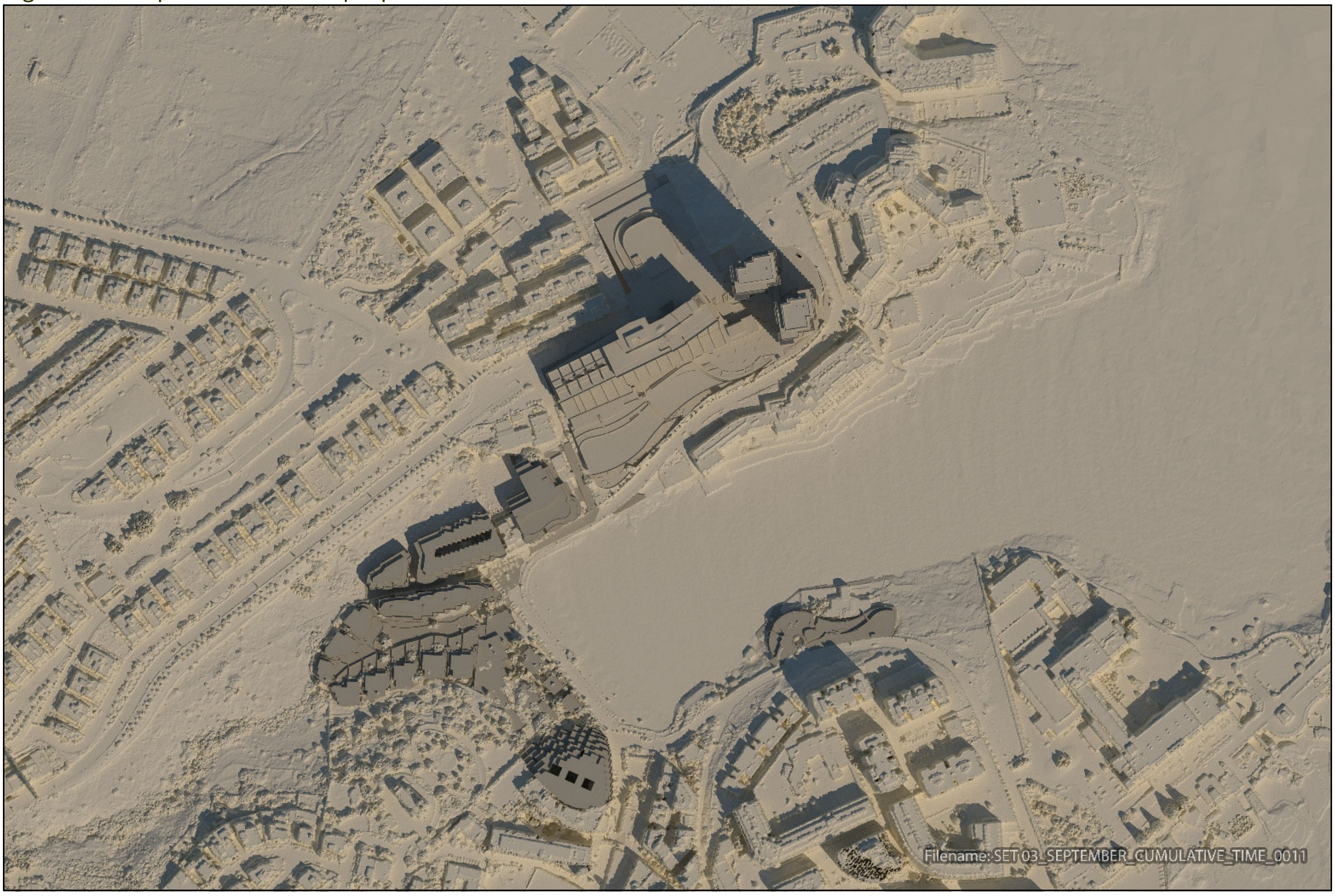

Figure 45: Sun path assessment | September 12:00

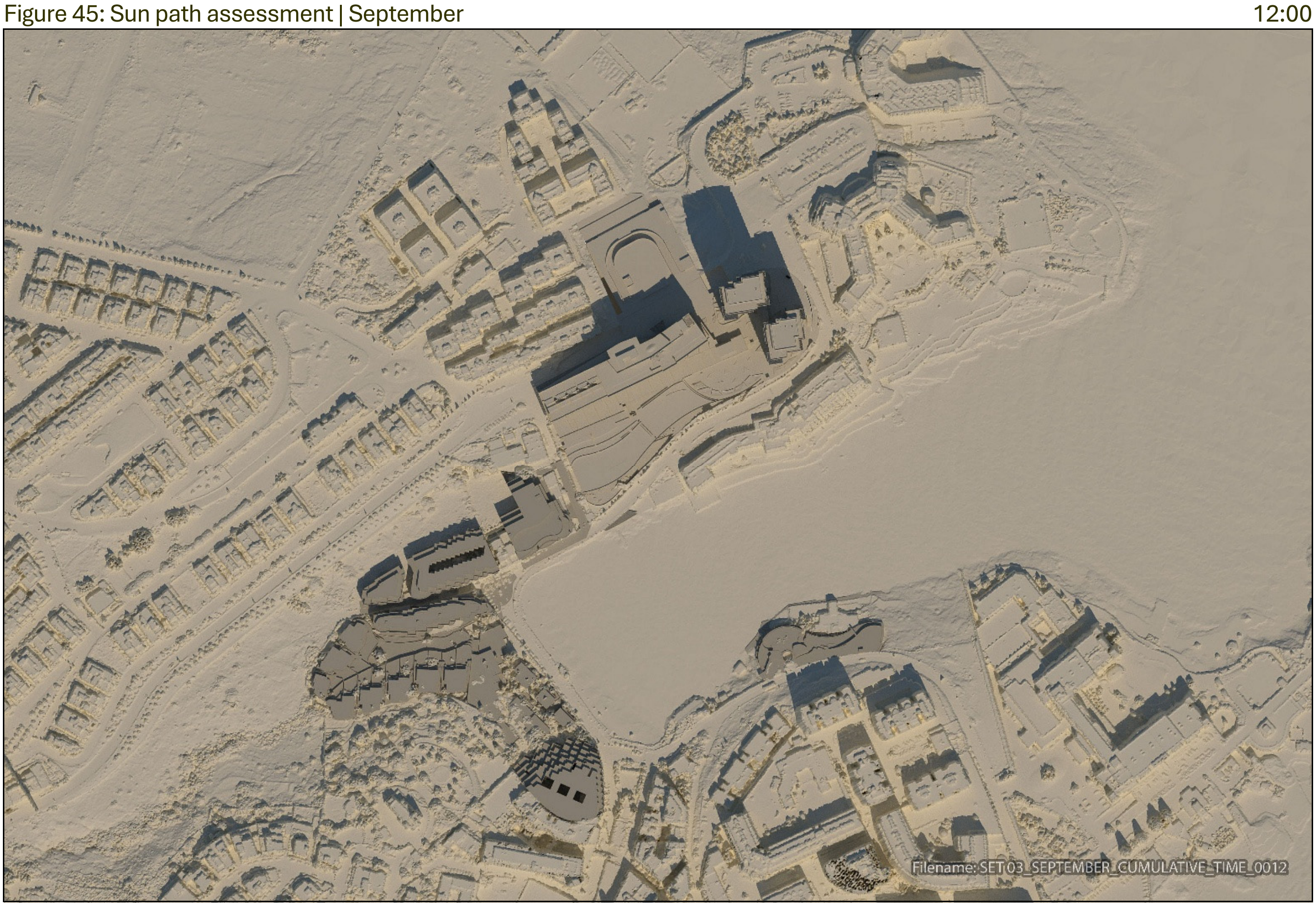

Figure 46: Sun path assessment | September 13:00

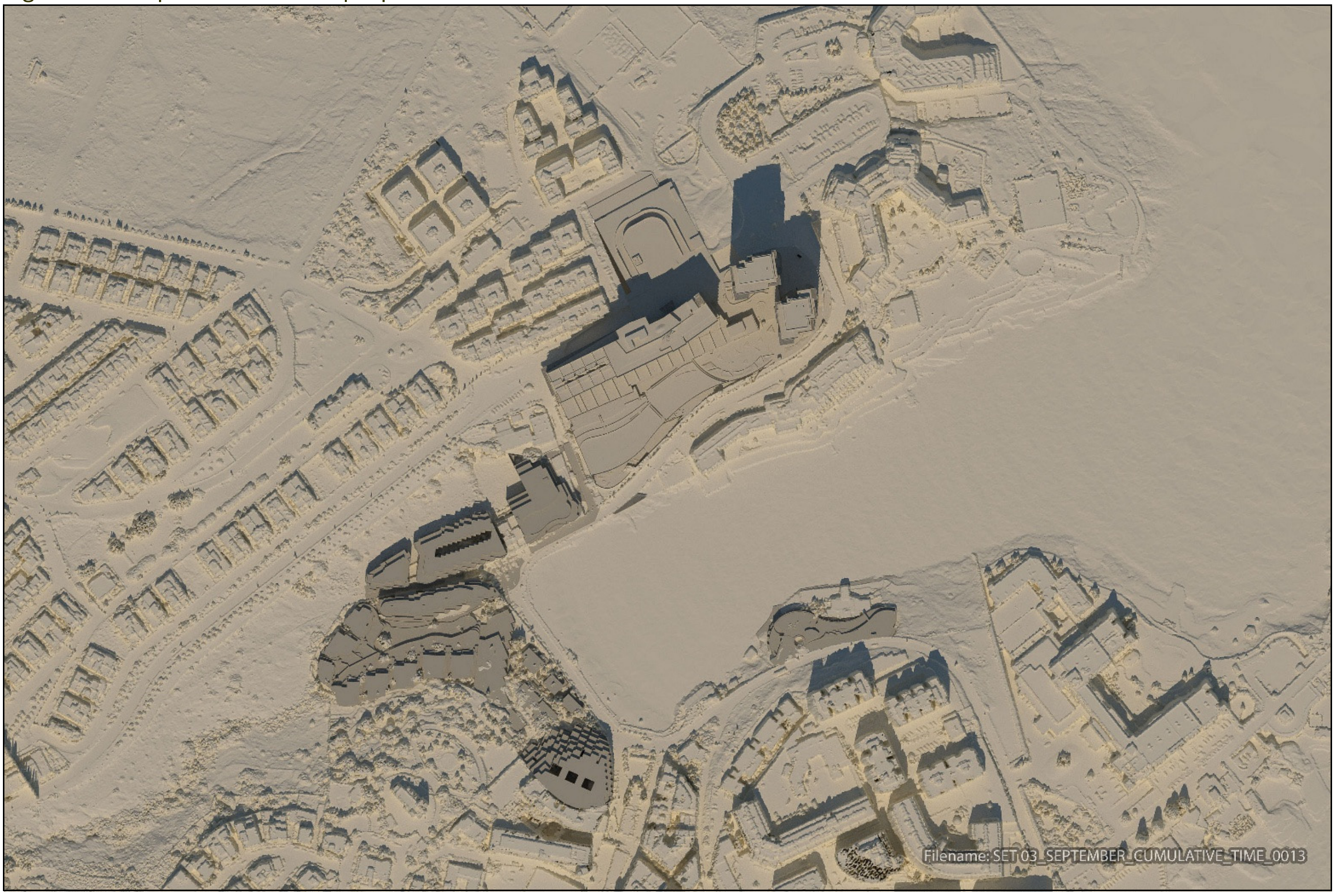

Figure 47: Sun path assessment | September 14:00

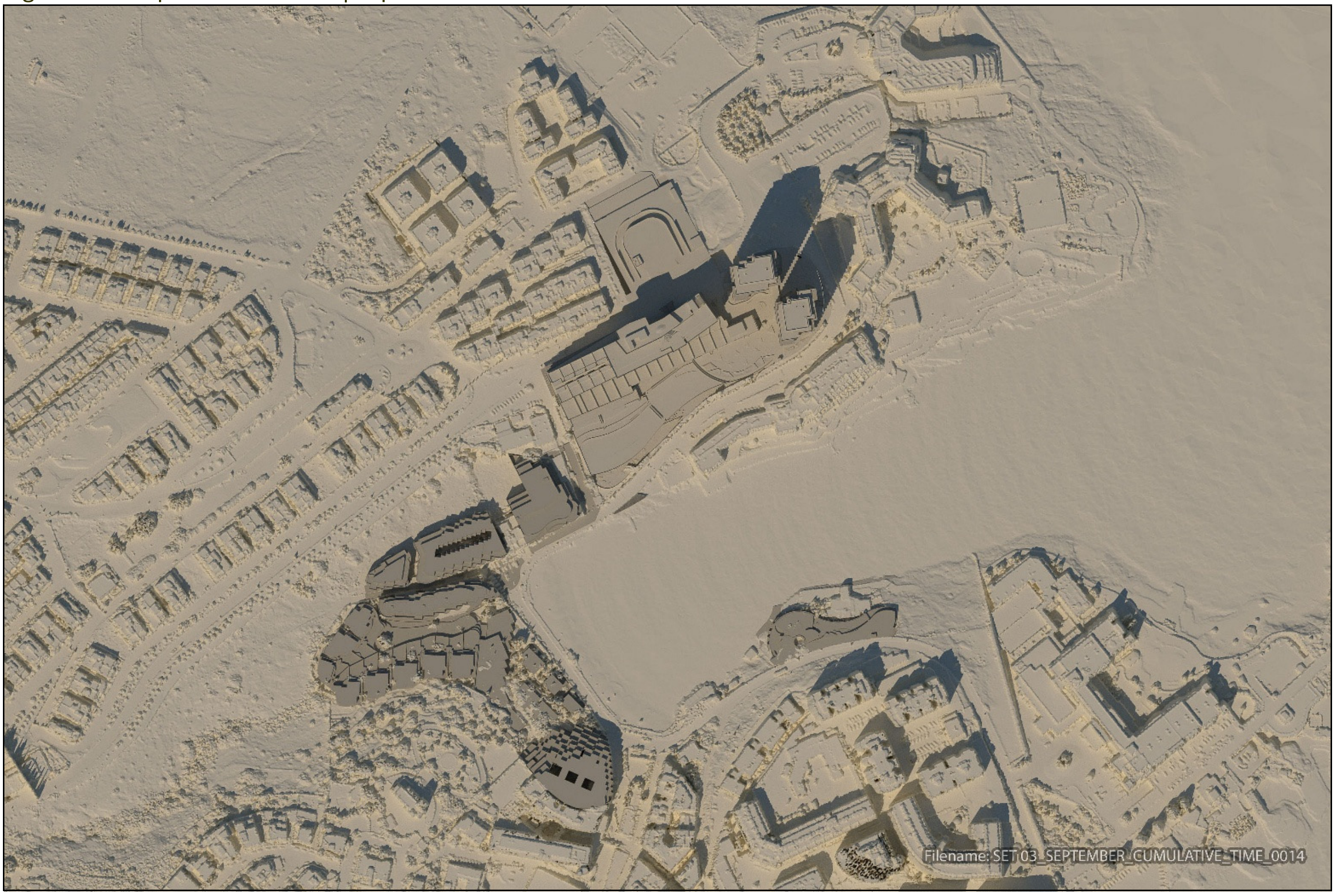

Figure 48: Sun path assessment | September 15:00

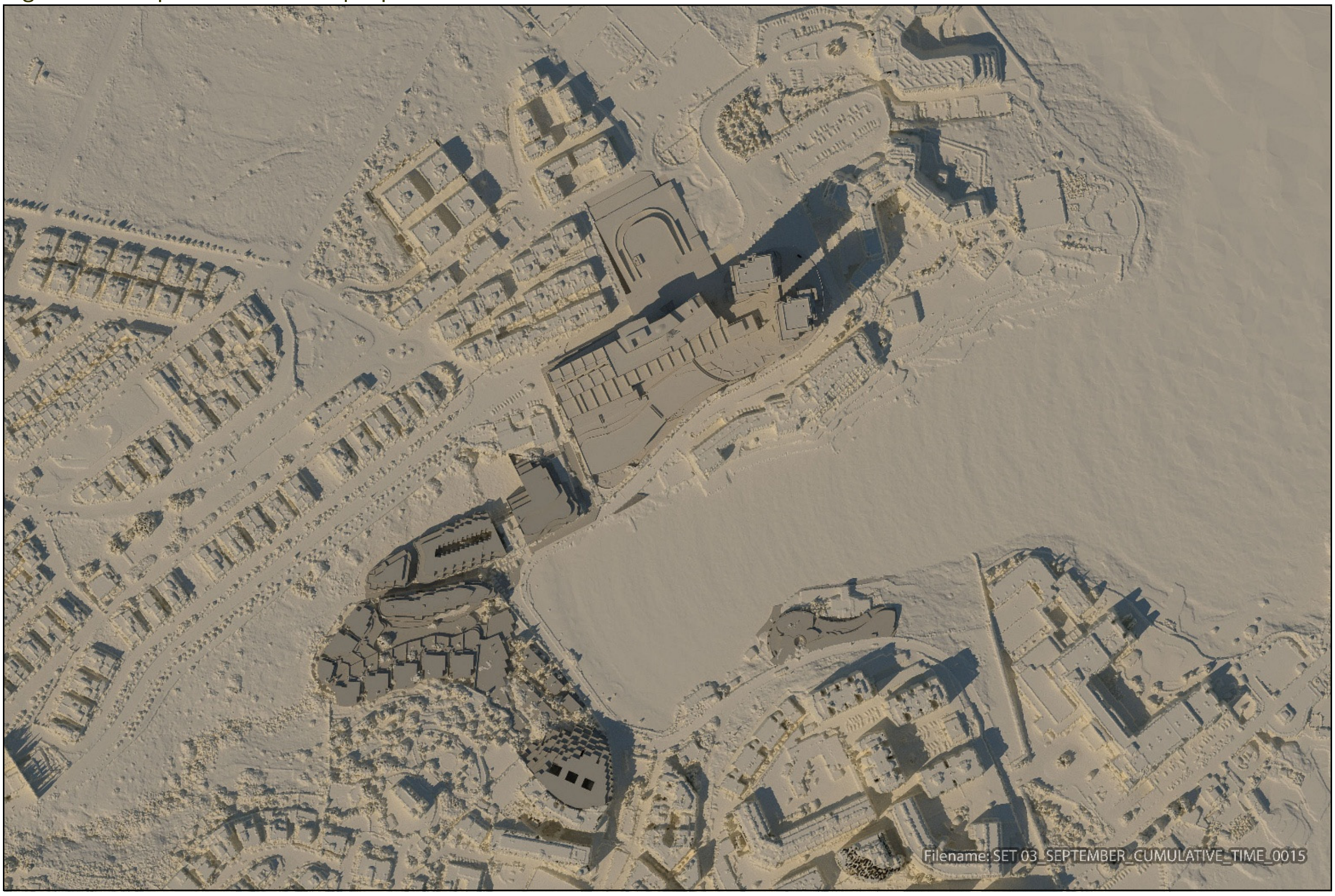

Figure 49: Sun path assessment | September 16:00

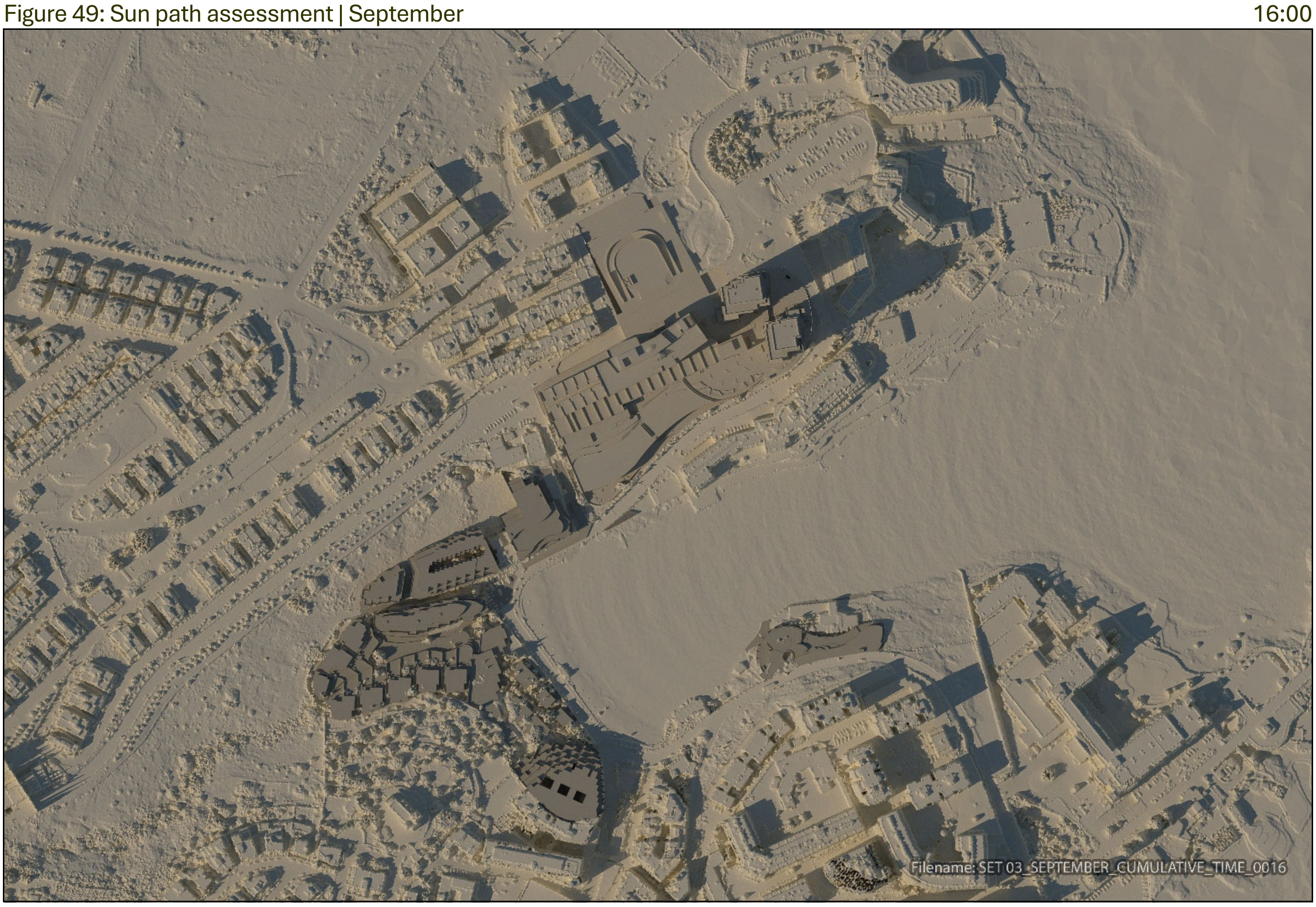

Figure 50: Sun path assessment | September 17:00

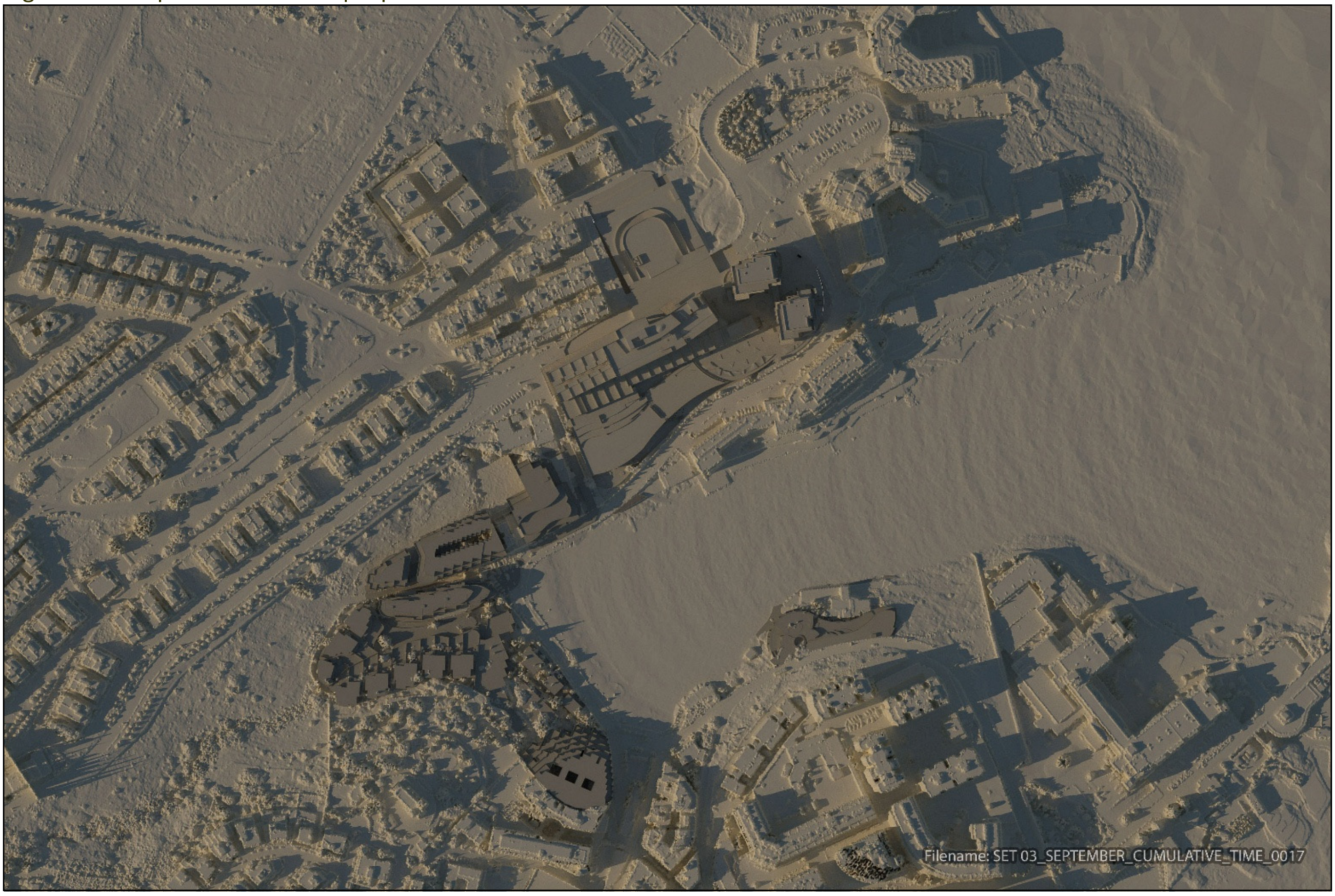

Figure 51: Sun path assessment | September 18:00

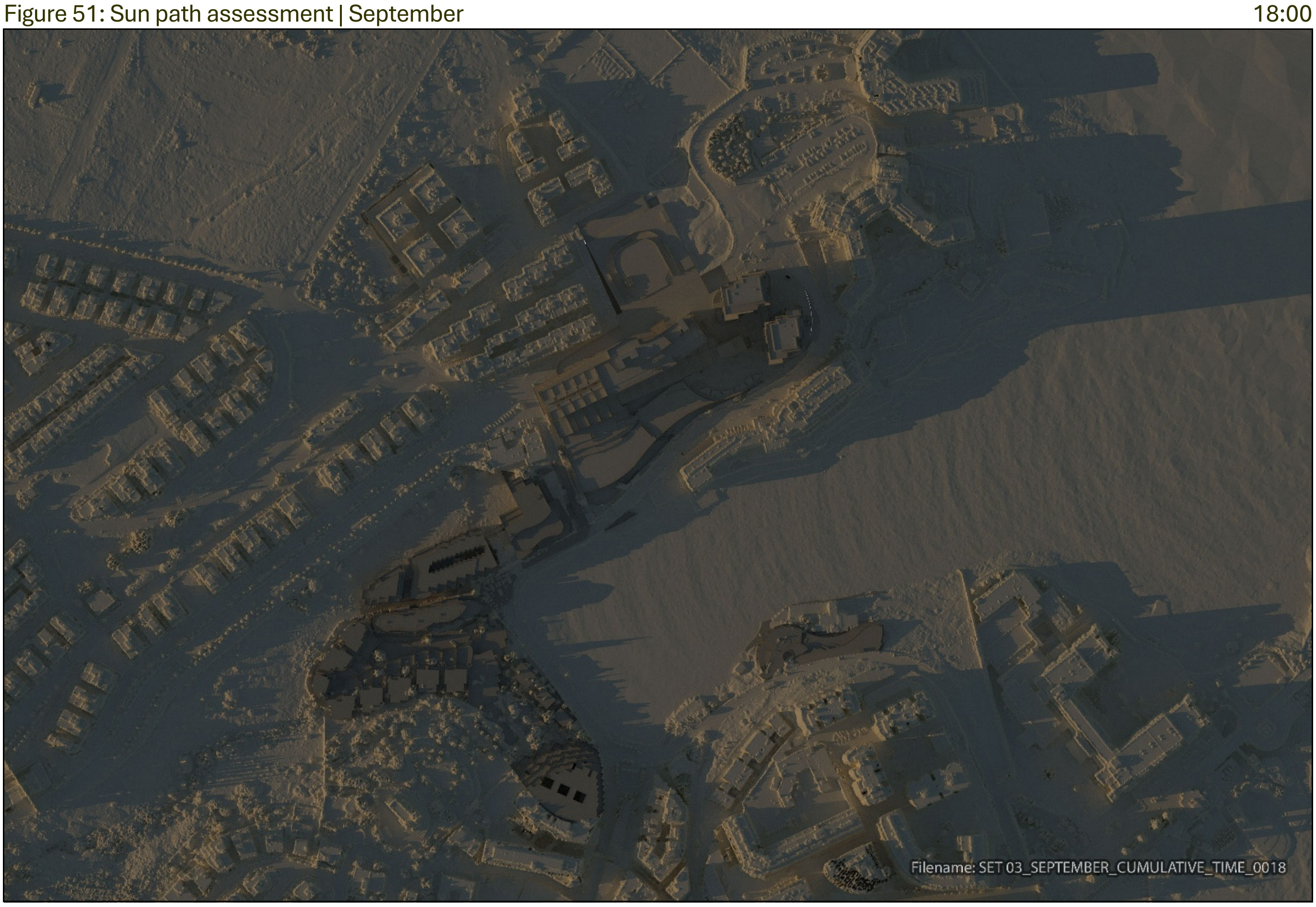

Figure 52: Sun path assessment | December 07:00

Figure 53: Sun path assessment | December 08:00

Figure 54: Sun path assessment | December 09:00

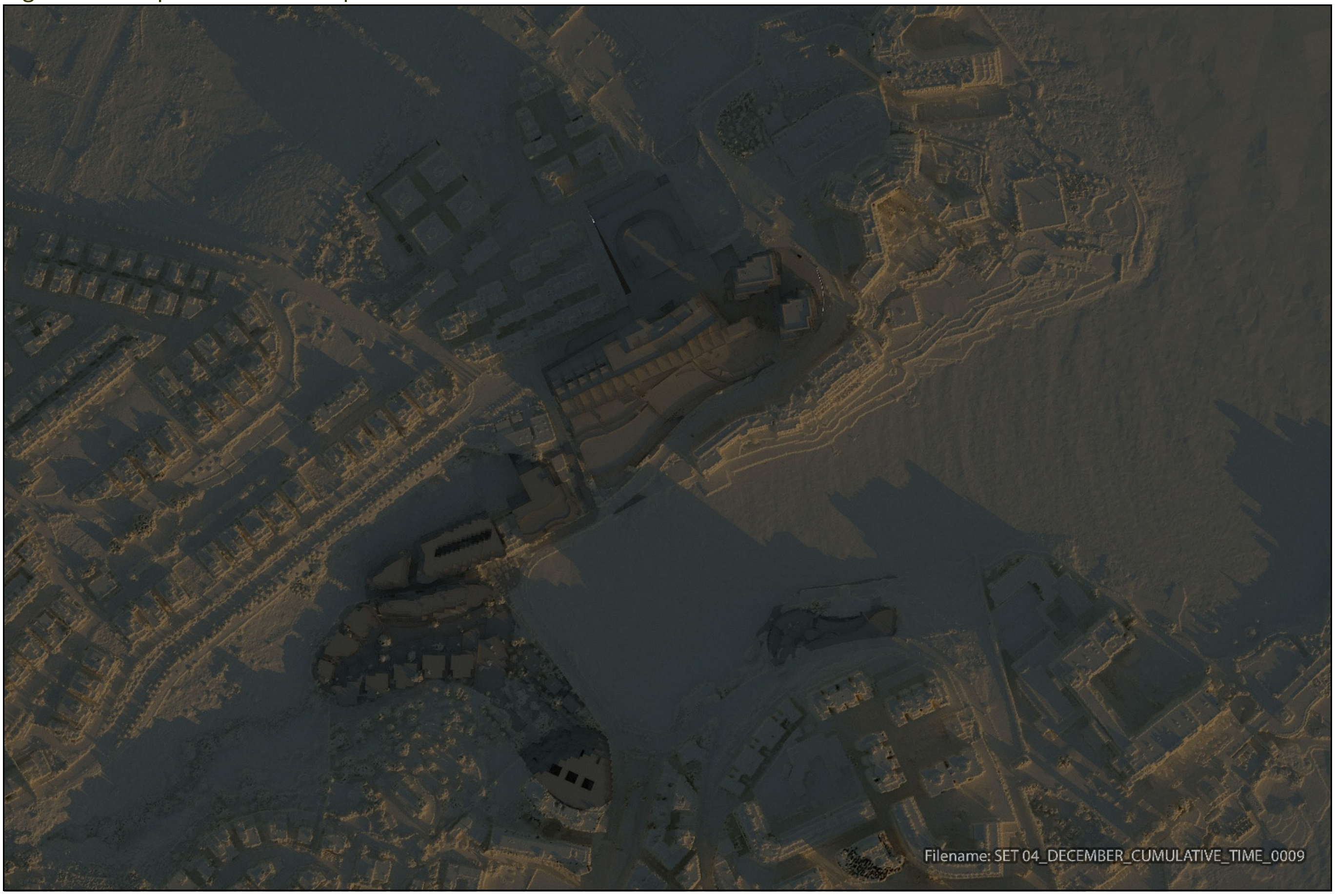

Figure 55: Sun path assessment | December 10:00

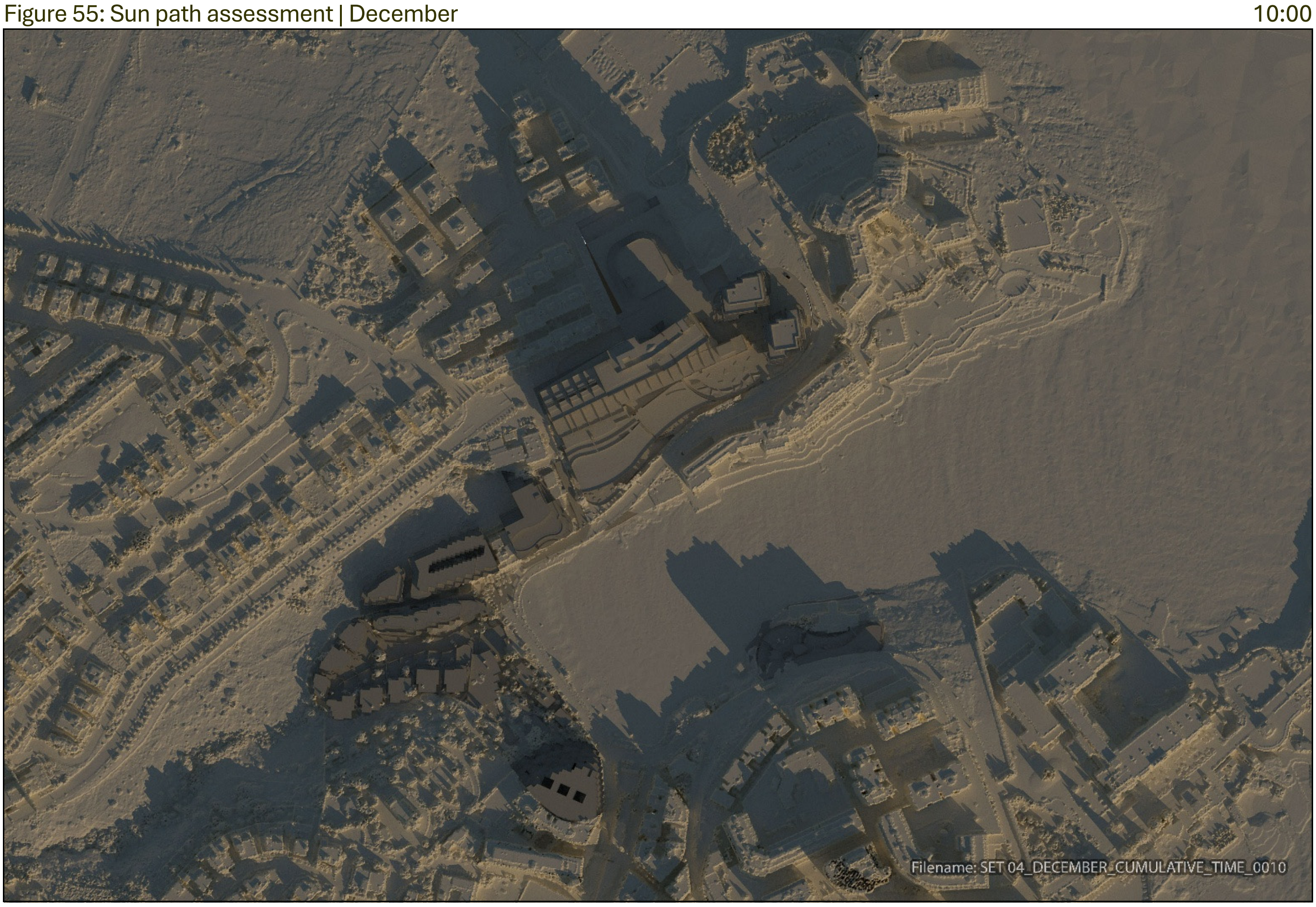

Figure 56: Sun path assessment | December 11:00

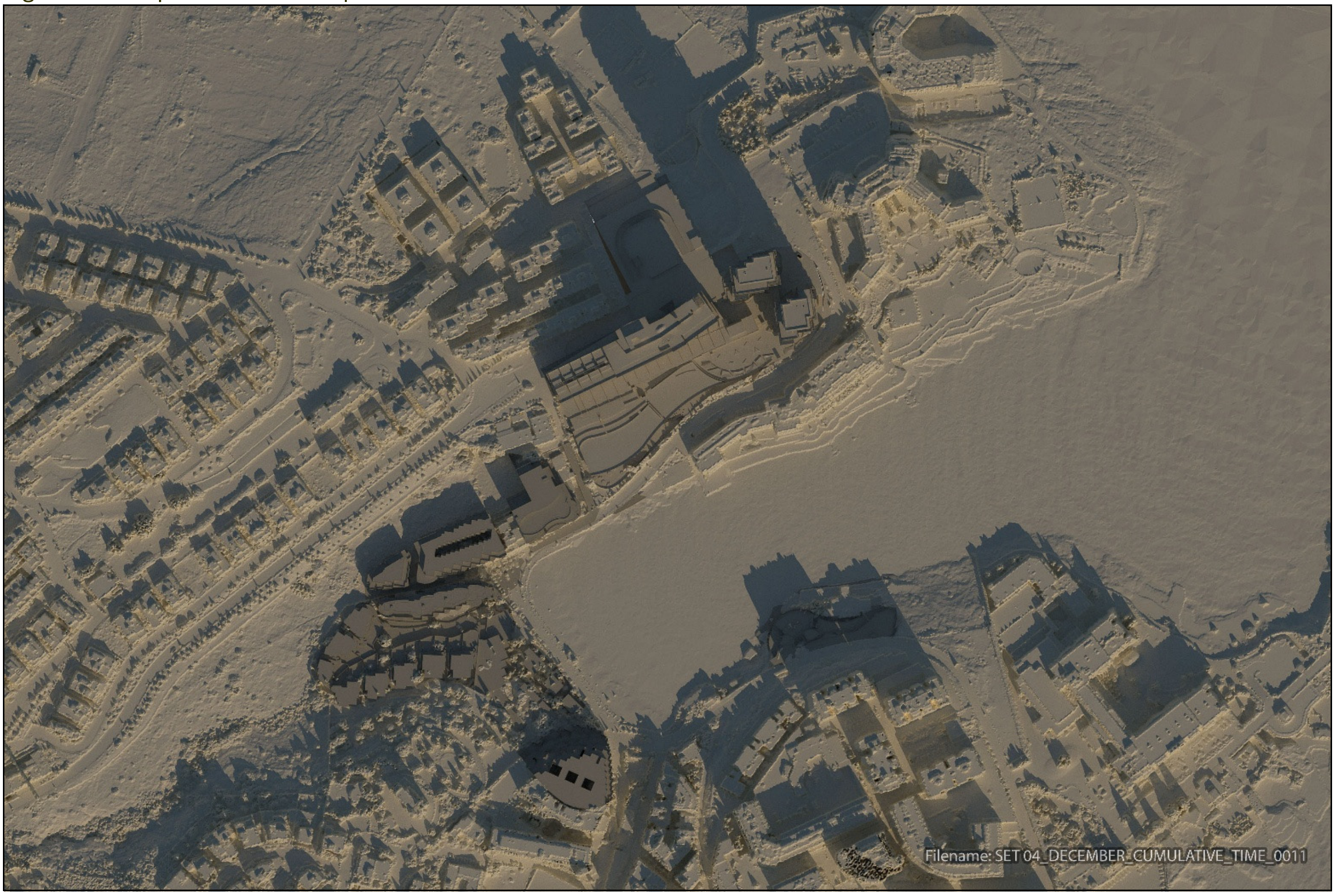

Figure 57: Sun path assessment | December 12:00

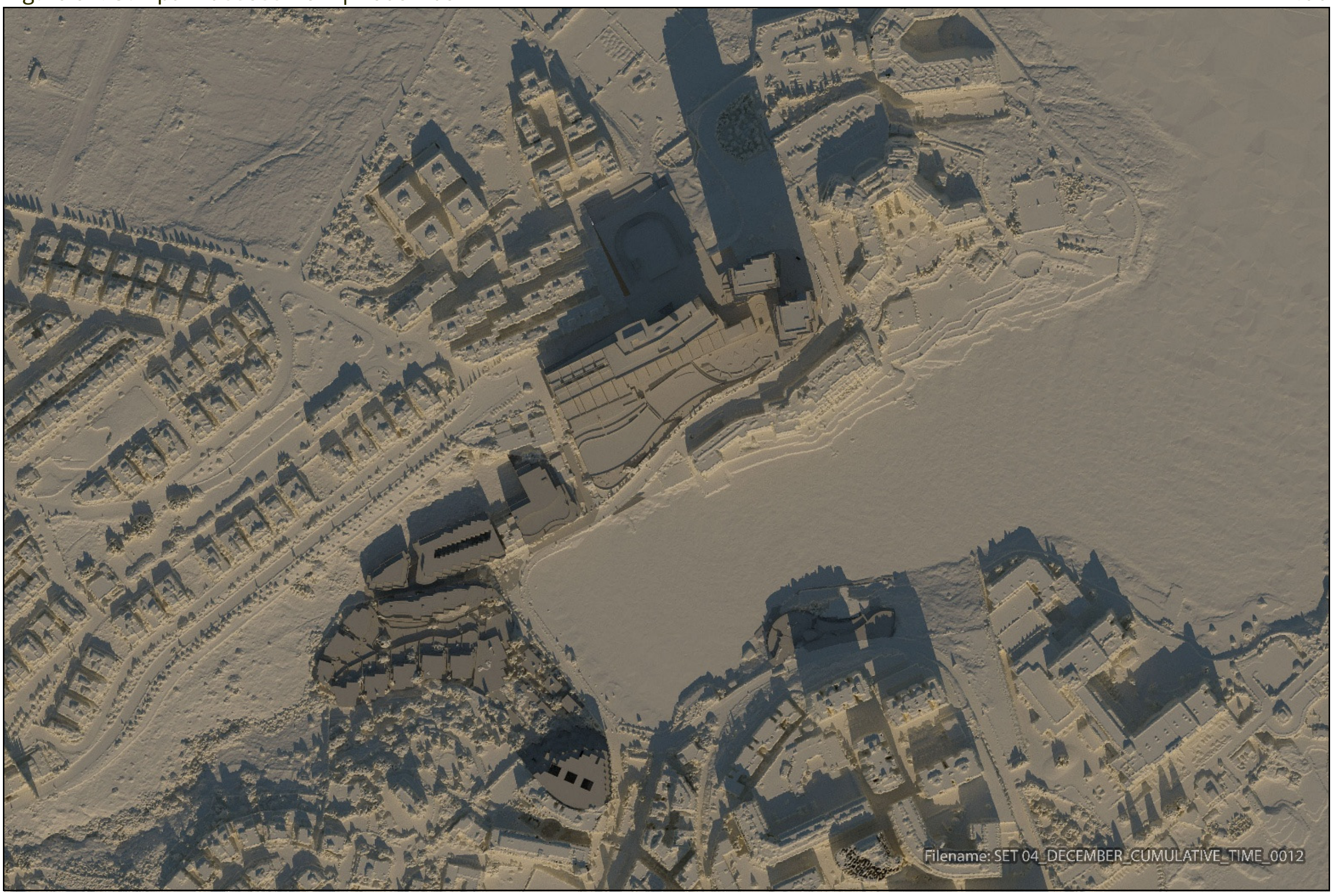

Figure 58: Sun path assessment | December 13:00

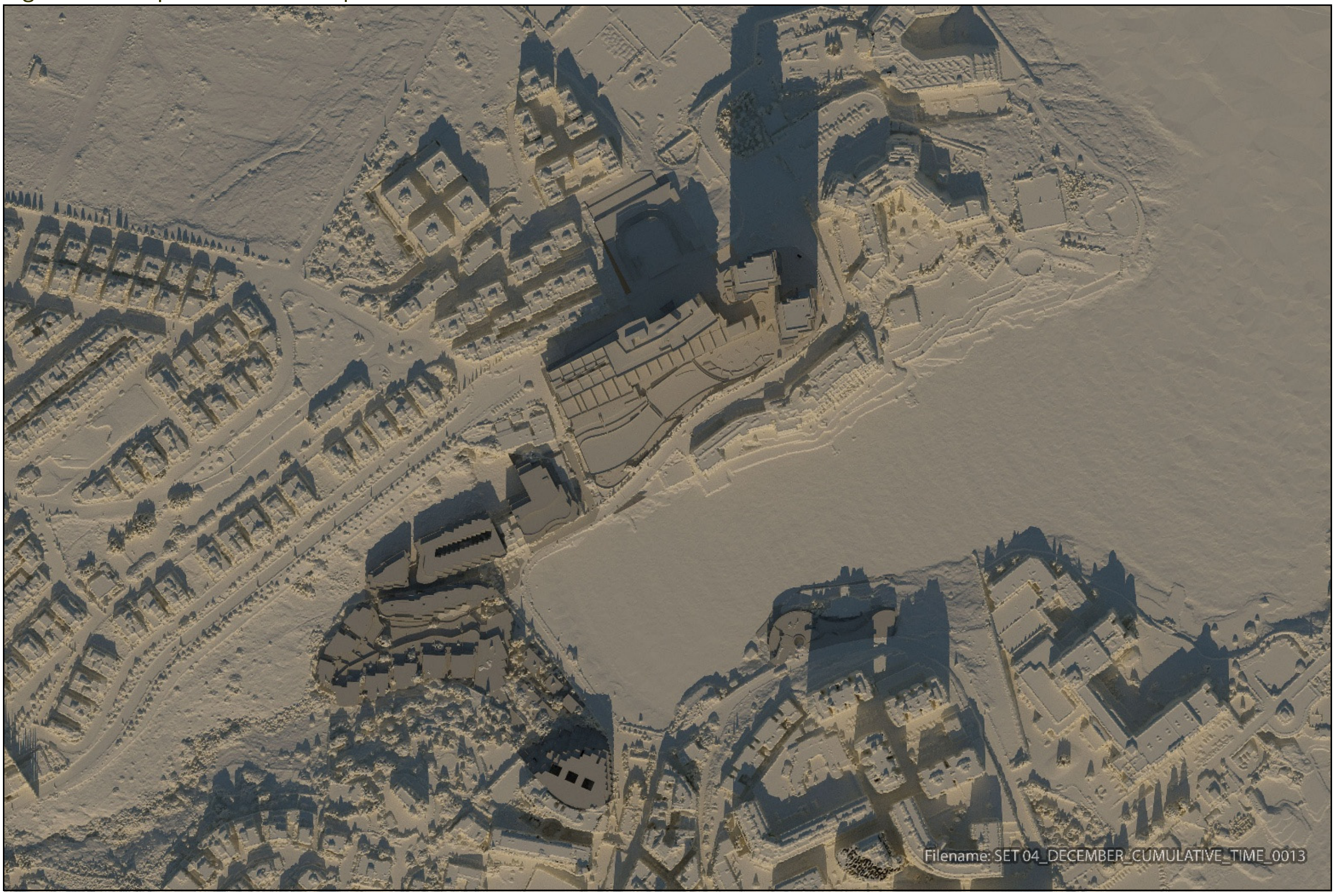

Figure 59: Sun path assessment | December 14:00

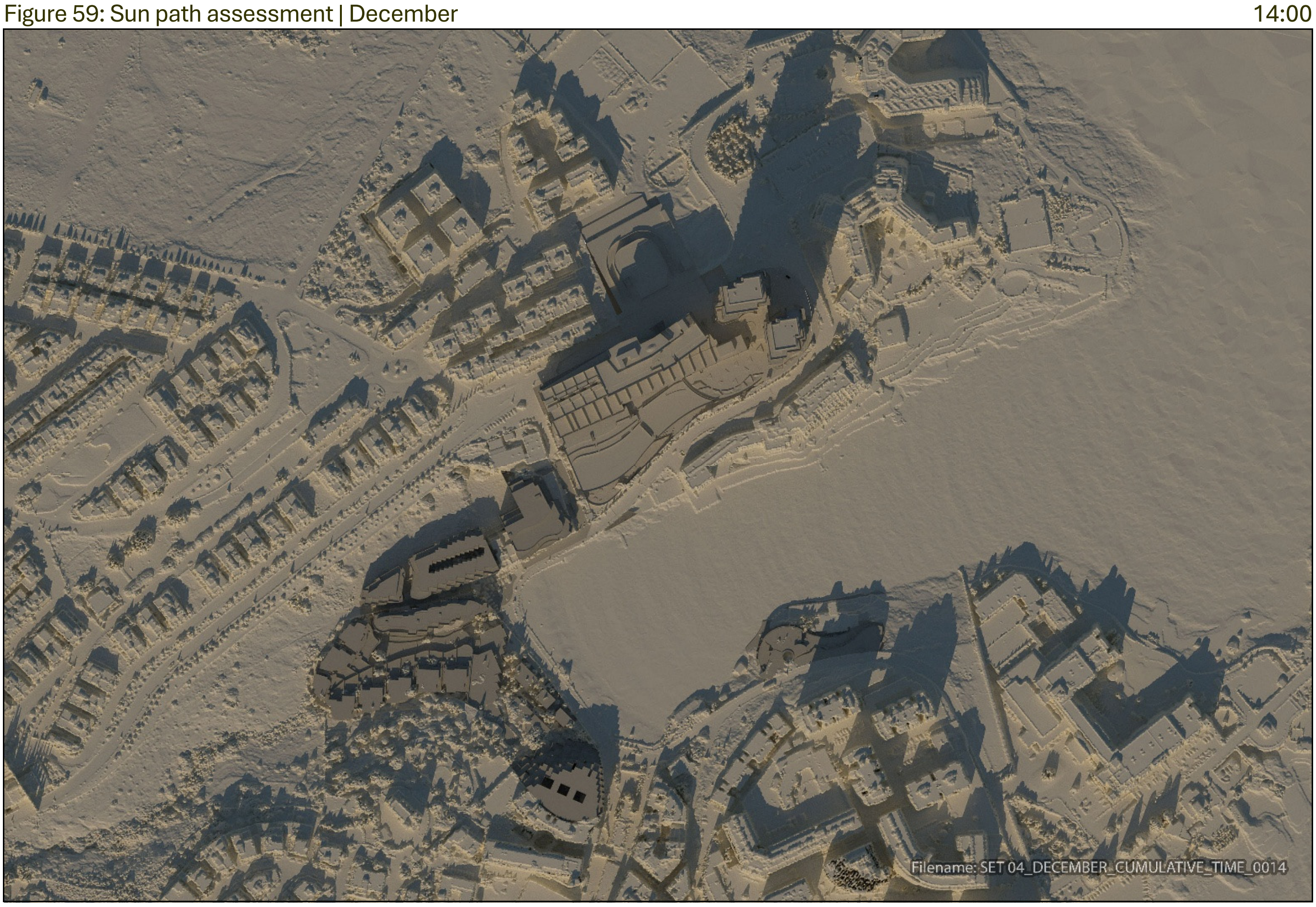

Figure 60: Sun path assessment | December 15:00

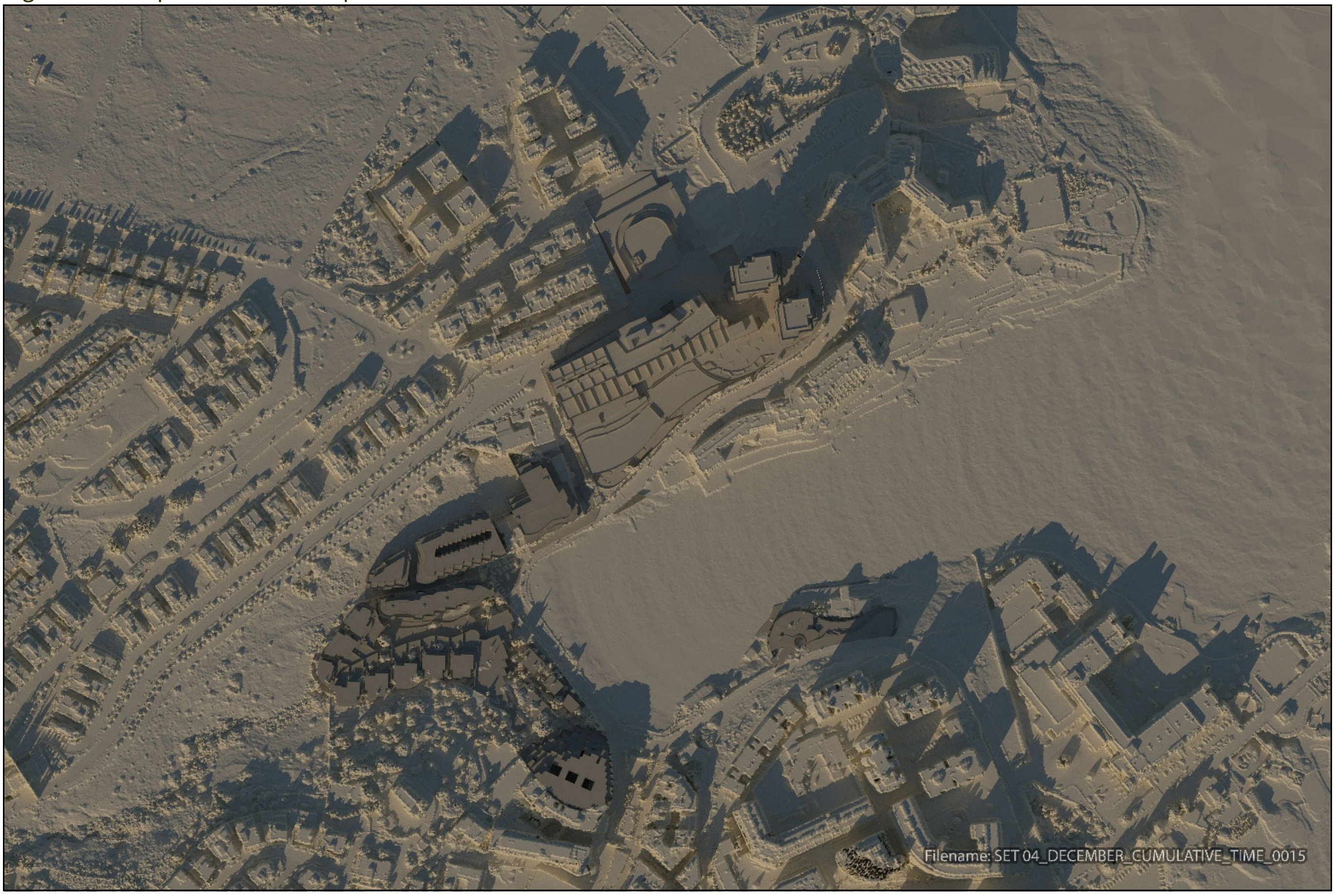

Figure 61: Sun path assessment | December 16:00

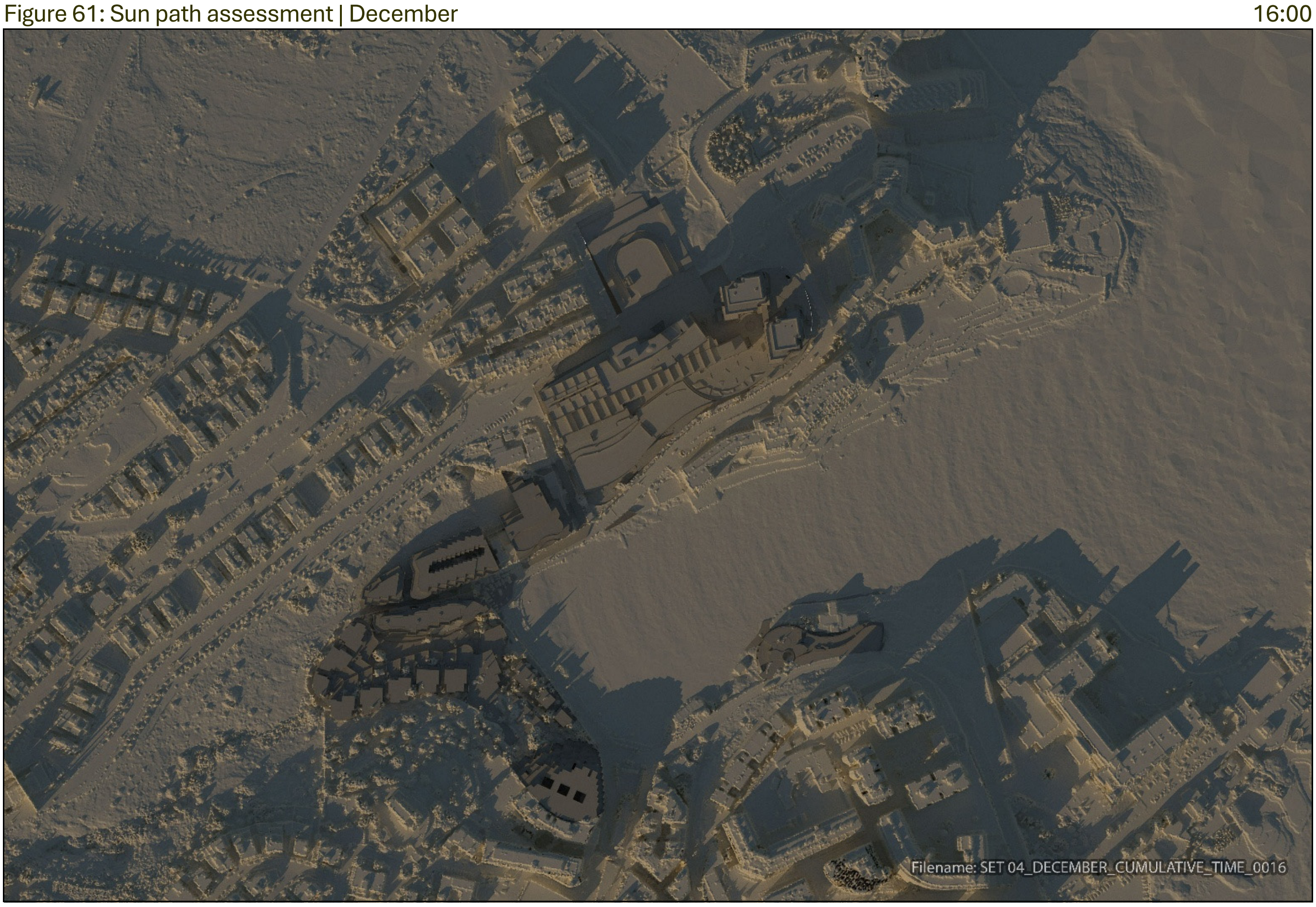

Figure 62: Sun path assessment | December 17:00

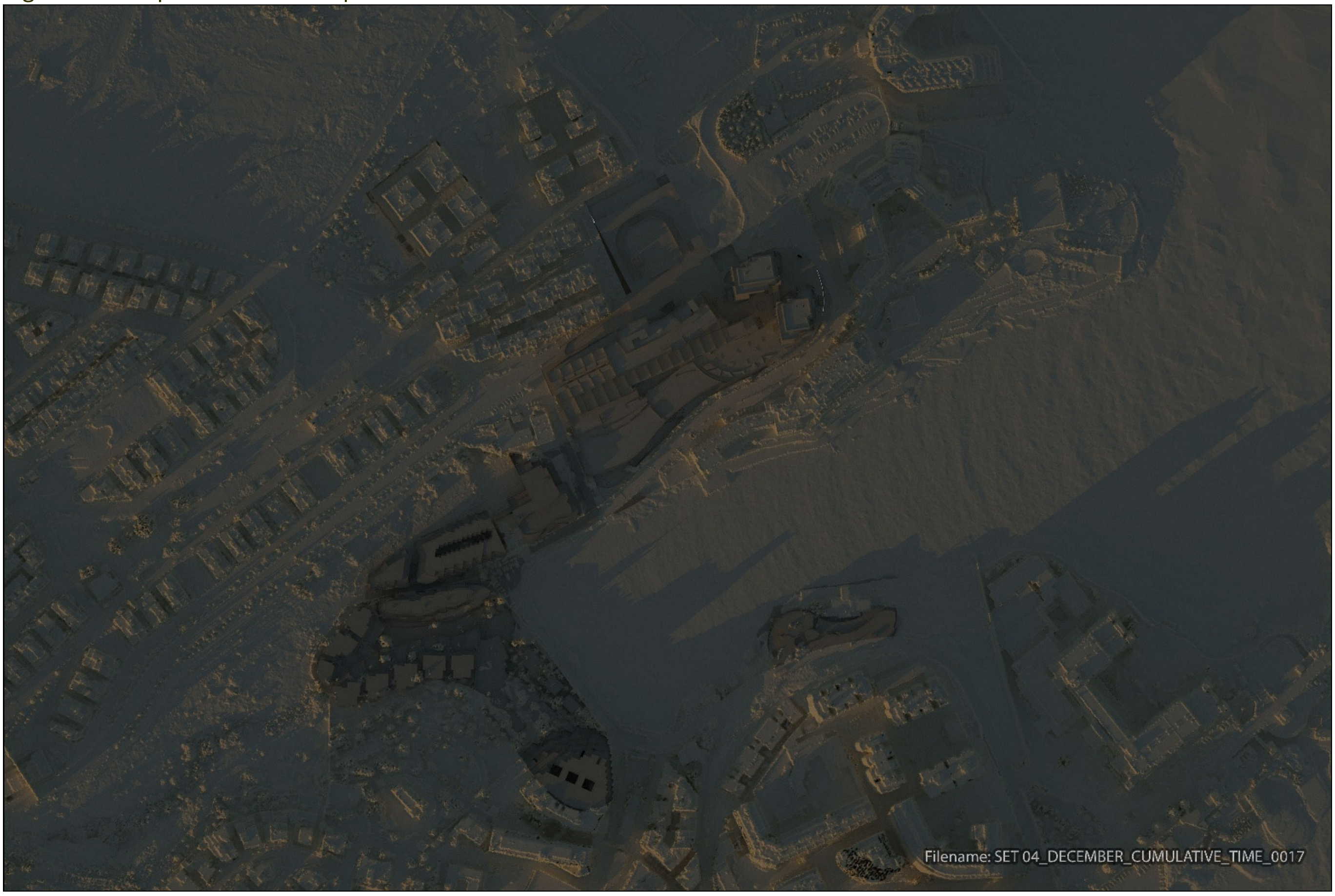

Figure 63: Sun path assessment | December 18:00

Table 2: Land uses: Units and Gross Floor Areas

Month	Residential	St George’s Bay Hotel
Marc h	07:00 to 10:00	15:00 to 18:00
June	07:00 to 09:00	16:00 to 18:00
September	07:00 to 10:00	15:00 to 18:00
December	07:00 to 12:00	14:00 to 18:00

Appendix B03 to this Statement contains the images discussed about, which can be viewed as a slide show.

Conclusion

It is thus submitted that the original EPS and the AA together with this Statement as sources of environmental information for informed decision-making purposes remain valid.

Paul Gauci

Enclosed:

Appendix B01

Appendix B02

Appendix B03

References

ERA. (2017, July). *EA/00007/17: Proposed City Centre multi-use development, including excavation of former ITS site & Wesghet Lewis V. Farrugia/Wesghet George Portanier, demolition of modern structures, sanctioning of partly demolished non-scheduled building, retention* ... Retrieved July 10, 2025, from Environment & Resources Authority (ERA): https://era.org.mt/era-project/pa03807-17/

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