

Our Ref: STS020/Screening STS 2026

9th April 2026

Environment & Resources Authority
Attention: EIA Team

Re: Changes to the plans for the Sliema Townsquare Development

1. This statement is being undertaken by the EIA Coordinator who carried out the EIA for the development of Sliema Townsquare (PA 1191/05: *Construct mixed development which includes a) shopping avenue, b) commercial areas and residential units, c) underground parking and service facilities at Old Union Club, Hugh Hallet Street, Tigne' Street, Sliema*) in order to assess whether the proposal as amended in PA/01398/23, and as currently submitted to the Planning Authority (PA), would have a significant impact on the environment beyond what was already assessed in the original Environmental Planning Statement (EPS).
2. In order to assess the proposed changes, the architects provided the plans (a full set of plans is available on e-Apps). The master plan is shown in **Figure 1**. The proposal is hereinafter referred to as 'the Scheme'.

Background

3. As a background to the Scheme, an EPS was prepared on behalf of Townsquare Sliema Ltd (hereinafter referred to as 'the Applicant'), to support planning application PA/01191/05 for the redevelopment of the former Union Club site in Sliema into a high-rise residential and office complex with shopping / food and beverage / leisure facilities, as well as car parking. Planning application PA 01191/05 was validated by MEPA on 21st March 2005. The EPS was certified by MEPA in August 2007 and submitted for public consultation in September 2007. The EPS was based on a development comprising: 242 apartments, 8,847m² of retail / F&B and ancillary uses, 5,700m² of office space, and 800 car parking spaces.
4. Subsequently, following detailed discussions with the then Malta Environment & Planning Authority (MEPA), the Applicant changed the height of the development; in 2010, an EPS Update was submitted to assess these changes.
5. In June 2011, an Addendum to the EPS was prepared, in order to assess the impact on air quality from the Scheme. Comments on the Addendum were included in Appendix 5 of MEPA's Environment Report for the Scheme that was prepared in April 2012.

6. In August 2014, further changes the Scheme were made as follows:
 - Number of residences – 181 apartments (34,800 m², excluding terraces);
 - Offices – 4,719 m²;
 - Retail – 9,105 m²; and
 - Parking – 721 spaces.
7. As a result of the proposed changes, a letter was prepared by Adi Associates confirming that the proposed changes were unlikely to significantly affect the findings of the certified EPS prepared for PA/01191/05 and its Updates and Addenda.
8. In January 2016 the Environment & Resources Authority finalized its report on the Environment Impact Assessment process for PA/01191/05 and in August 2016 planning permission was granted. This decision was appealed by the Sliema Local Council and NGOs and the decision of the Planning Authority was overturned by the Appeals Board in May 2018.
9. In accordance with the decision of the Appeals Board, an Environment Impact Assessment Update Report was prepared in December 2018 to assess the latest version of the Scheme. This EIA Update Report assessed the impacts of the development which comprised 159 apartments, 4,420 m² of office space and 8,557 m² of food and beverage and retail outlets. The impacts included those on cultural heritage, noise, air quality, visual amenity and effects on human populations. A permit was granted in 2019.
10. In 2023 the Applicant submitted an amendment to PA/01191/05 under PA/01398/23. The following land uses were proposed and approved.

Table 1: Approved and proposed land uses for the Scheme

Land use	EIA	PA/01191/05 (as approved)	PA/01398/23
F&B	1,262 m ²	784 m ²	982 m ² + 989 m ² external
Retail	7,295 m ²	7,463 m ²	8,457 m ²
Offices	4,420 m ²	4,081 m ²	6,478 m ²
Health club (spa /gym)	690 m ²	590 m ²	939 m ²
Hotel	-	-	90 keys
Residences	159 apartments	159 apartments	234 apartments (within same volume)

11. The 2023 EIA Screening Assessment had indicated that the changes proposed under PA/01398/23 could give rise to air quality impacts as a result of the increase in the Annual Average Daily Traffic (AADT). A separate Air Quality Study was submitted and accepted by ERA. No major impacts were identified.

Description of Scheme

12. The land uses of the Scheme are shown in **Table 2** below. The table shows the land uses that were considered in the EIA for PA/01191/05, those under the approved PA/1398/23, and those proposed under the current minor amendment to PA/1398/23. The main change to the Scheme from the approved development is the

removal of the hotel (90 keys) and the reinstatement of the Pavilion resulting in a net increase in retail / F&B of 386 m².

Table 2: Approved and proposed land uses for the Scheme

Uses	EIA	Approved PA/1398/23	Proposed	Difference
F&B	1,262 m ²	982 m ² + 989 m ² external = 1,971 m ²	Removal of: 99.71 m ² (Internal) 77.42 m ² (kitchen) 138.86 m ² (store) 141.07 m ² (external) = 457.06 m ²	- 457.06 m ²
Retail	7,295 m ²	8,457 m ²	Addition of: 362.02 m ² (Pavilion 4B) 93.05 m ² (Pavilion External 4B) 72.1 m ² (Core 4B) 294.74 m ² (Internal), 21.25 m ² (store) = 843.16 m ²	+843.16 m ²
Offices	4,420 m ²	6,478 m ²	6,478 m ²	No change
Apartments	159 units	234 units	234 units	No change
Hotel	0	90 keys	0 keys	- 90 keys

Assessment of proposed changes

13. In terms of geology, since the site has largely already been excavated and there are no proposed changes to the excavation levels, the impacts remain the same.
14. In terms of cultural heritage, the main impacts previously identified were on Villa Drago. In the EPS, it was stated that:

4.47 The Scheme's effect on Villa Drago is limited to the construction of the buildings within the curtilage, and the vibrations arising there from. Although planning permission was granted (vide PA 00470/00) for a covered walkway to be constructed from the southern façade of the villa to the proposed pedestrian walkway along the southern boundary, the Scheme plans for the villa are for it to remain freestanding, and for the façades to remain intact. The Scheme further provides for the façade accretions added over the years to be removed and for the villa to be restored to as close to its original as possible. The internal staircase and original layout will be retained. Since no features will be lost or damaged, the impact of the Scheme on Villa Drago is judged to be not significant. The restoration of the façades and the interior of the villa, and the carrying out of structural repairs that are vital to the structural integrity of the building, are considered to be of major beneficial significance.

Alteration of Context

4.48. The three new buildings proposed within the curtilage of the villa (Buildings B1, B2 and B3) will be sited approximately 10 m from the nearest façade of the villa. The closest point of the façade with the common wall leading to the third party on the west is approximately 8 m away. Since the height of the proposed buildings immediately adjacent to Villa Drago is less than the surrounding existing and proposed third party buildings, the effect on the setting of Villa Drago (the alteration of context) is considered to be not significant. The refurbishment of the gardens for the enjoyment of the public is considered to be of minor beneficial significance

15. The architects have confirmed that actual removal of the facade accretions already started under the current Permit PA/1191/05. The current permit proposes no changes to the restoration envisaged in PA/1191/05.
16. The Scheme proposes a lightweight walkway/bridge on the southern façade of the Villa to the proposed pedestrian walkway along the southern boundary to enable the Villa to be included more holistically and functionally in the project. However, the villa is still to remain free-standing, and the facades will remain intact.
17. The buildings proposed around the Villa (Buildings A & B) will be sited approximately 10 m from the nearest façade of the Villa. The closest point of the façade with the common wall leading to the third party on the west is approximately 8 m away. Since the height of the proposed buildings immediately adjacent to Villa Drago is less than the surrounding existing and proposed third party buildings, the effect on the setting of Villa Drago (the alteration of context) is considered to be not significant.
18. In terms of noise, given that the majority of the project has remained relatively similar and that the bulk of the excavation has been completed, the impacts from construction noise are likely to remain at similar levels to those assessed in the 2018 EIA Update Report. In terms of noise generation from the operation of the Scheme, it is noted that the access from Hughes Hallet Street will no longer remain, which means that any noise impacts from this access point on the sensitive receptors in Hughes Hallet Street will not be accrued. As mentioned above, all traffic will be via Triq Qui-Si-Sana. **Table 3** and **Table 4** assess the peak traffic generation estimates from the approved development under PA/011398/23 and the Scheme. The figures suggest a slight decrease in the peak hour flows from the Scheme, therefore the impact of noise from traffic remains the same as that in 2023 where there was no doubling of traffic, so the noise impact was not significant.

Table 3: Estimated peak hour traffic for the approved development

Land use	Weekday AM		Weekday PM		Saturday	
	08:00		17:00		12:00	
	IN	OUT	IN	OUT	IN	OUT
Hotel	8	7	5	6	4	3
Offices	107	6	5	84	-	-
Residential	14	28	37	28	35	26
Retail and F&B	61	31	61	74	95	77
Total	190	72	108	192	134	106
Total flow	262		300		240	

Table 4: Estimated peak hour traffic for the Scheme

Land use	Weekday AM		Weekday PM		Saturday	
	08:00		17:00		12:00	
	IN	OUT	IN	OUT	IN	OUT
Hotel	-	-	-	-	-	-
Offices	107	6	5	84	-	-
Residential	14	28	37	28	35	26
Retail and F&B	64	32	64	77	99	80
Total	185	66	106	189	134	106
Total flow	251		295		240	

19. In terms of air quality, in 2023, an Air Quality Assessment¹ was prepared for the proposed land uses under PA/1398/23, as the AADT was estimated at 3,188 trips. The impacts on air quality at 10 sensitive receptors ranged from negligible to moderate and a Green Transport Plan was prepared. The AADT estimate for the current Scheme is 3,057 trips, which is a slight reduction from the AADT as assessed in the 2023 Air Quality Study. The impacts on air quality from the Scheme remain the same as those in the approved permit PA/1398/23. An updated Green Travel Plan has also been prepared for the Scheme.
20. In terms of visual amenity, the proposed buildings have a similar configuration to those assessed in the 2018 EIA Update Report, where there was no hotel and there was the pavilion. Given the scale of the current changes the assessment of the visual impact is unlikely to be different to what has already been assessed.
21. We trust the above meets ERA requirements.

Yours sincerely,



Rachel Xuereb
Director, Adi Associates

¹ Adi Associates Environmental Consultants Ltd, 2023. Amendments to Approved Townsquare Development, Sliema. Air Quality Study Update. Version 2. San Gwann, October 2023; iv + 26 pp. + 1 Appendix