

The Executive Chairperson  
Planning Authority  
St Francis Ravelin  
Floriana

Date: 31 October 2023  
ERA Ref: GF/00150/06

Dear Sir, Madam,

**Planning Ref.:** PA/01398/23

**Proposal Description:** Amendments to PA 1191/05 including: increase in number of apartments from 159 to 234; reconfiguration of parking levels to increase number of parking spaces from 600+ to 850+; introduction of a green parking area for alternative mode of transport including cycling, scooters, and taxis; removal of vehicular access to the car park from Hughes Hallet street level; introduction of hotel (Class 3B) to also serve apartments (Class 1); addition of amenities level within double height level in tower; conversion of recessed level of tower into full floor and conversion of second recessed level of tower housing core into recessed level; removal of the Pavilion building; introduction of office levels within double height areas in lower buildings; internal reconfiguration of office spaces; internal reconfiguration and subdivision of retail and food and beverage outlets, increasing the total number of Class 4B units, changing the use of Class 4C outlets to Class 4D and increasing the number of Class 4D units; inclusion of external areas to cater for the use of tables and chairs.

**Location:** Townsquare, Tower Road, Hughes Hallet Street, Tigne Street, Qui-Si-Sana Lane, ix-Xatt ta' Qui-Si-Sana, Sliema.

### **Environmental Impact Assessment Regulations (S.L. 549.46)**

Reference is made to the above-captioned development application.

#### ***Background and introduction***

This proposal involves amendments to the approved Townsquare development (PA/01191/05) at the former Union Club Site in Sliema. The approved permit comprises a mixed development with retail, offices, food and beverage outlets, a 28-storey residential tower, underground parking and service facilities, and had been subject to an Environmental Impact Assessment (EIA) in 2007 and EIA Updates in 2010, 2012, 2015 and 2019. ERA had communicated its latest positions in April 2019 as per Eapps documents PA/01191/05 – 1333a-c.

In function of PA/01398/23, ERA requested a statement from the EIA Coordinator to determine whether the proposed revisions to the approved plans are likely to affect the findings of the previous EIA. The statement concluded that the proposed changes are unlikely to affect the findings and

conclusions of the previous EIA, except in terms of air quality where the envisaged increase in traffic generation required further assessment. To this effect, ERA requested the updating of the air quality study and its submission as an Addendum to the previous EIA Report, for further assessment in accordance with Regulation 24(3) of S.L. 549.46.

A concise summary of the EIA process is being attached to this correspondence as **Annex I**.

### ***Overview of the outcome of the EIA Coordinator Statement and Addendum to the EIA Report***

Impacts in relation to cultural heritage, noise, visual amenity and effects on human populations were not expected to differ from those assessed in the previous EIA, notably noise generation (*moderate to major adverse* during works, and *minor adverse* during operations), visual amenity (*major adverse* from various viewpoints), and effects on human populations resulting from the afore-mentioned impacts.

The updated air quality study indicated impacts from the release of particulate matter (PM<sub>10</sub>) by vehicular traffic, whereby the revised project would adversely affect the number of exceedances of the daily limit value for PM<sub>10</sub> (impact up to *moderate* significant), as well as the annual average limit values (up to *minor/moderate* significant). On the other hand, the consultants also noted that PM<sub>10</sub> daily limit values would be exceeded at all locations considered, as well as the annual limit value at multiple locations, even without the development in place, i.e. in the baseline scenario. Impacts in terms of nitrogen dioxide (NO<sub>2</sub>) emissions were assessed as *not* significant.

Compared to the previous air quality study, *moderate* adverse impacts in terms of exceedances of daily PM<sub>10</sub> limit values remain along ix-Xatt ta' Tigne (though extending along Sliema Ferries up to Triq Bouverie) and have shifted from Triq it-Torri to lx-Xatt ta' Qui-Si-Sana. These impacts are no longer limited to the years of commencement of operations but will continue to prevail after five years. In addition, *minor to moderate* adverse impacts in relation to changes to PM<sub>10</sub> annual average values have arisen for locations along lx-Xatt ta' Qui-Si-Sana and lx-Xatt ta' Tigne (Sliema Ferries up to Triq Censu Xerri).

### ***ERA's assessment and recommended way-forward***

The proposal was considered in the light of the already approved development, notably the development commitment established through PA/01191/05. The most significant impacts related to this project had already been taken into consideration during ERA's assessment of the 2018 EIA Update, namely dust and noise emissions during the excavation and construction phases and the changes to the visual amenity in the surrounding area.

According to the Addendum to the EIA Report, the traffic-related impacts remain moderately significant, though lx-Xatt ta' Qui-Si-Sana would also be affected by increased traffic emissions and

the affected area along Sliema Ferries would be extended. During assessment and interpretation of the air quality study and its modelling exercise, a degree of uncertainty was indicated with regard to the contribution of non-exhaust fractions of particulate matter. Considering this, a precautionary approach is to be adopted when designing further mitigation measures aimed at further attenuating the moderate impact predicted by this development.

The previous no-objection from an environmental point of view, as communicated for PA/01191/05 in April 2019, remains valid vis-à-vis the current application, subject to the conditions listed in Annex II to this correspondence. ERA recommends that additional measures be explored to further reduce traffic generation and the resulting emissions.

ERA also notes that, in the absence of a comprehensive plan-level picture of the overall development capacity of the surrounding area, case-by-case assessment through the EIA process has limitations vis-à-vis proper evaluation of cumulative impact, such as on air quality.

Yours faithfully,

Yves De Blick  
Senior Officer Environmental Assessment  
f/Director Regulatory Affairs

***Disclaimer***

*The above assessment is based on the information provided to ERA. Should it result that such information is incorrect, incomplete, missing or misleading, or in the event of any omissions or subsequent modifications, to the proposal 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. In such circumstances, ERA retains the right to take additional action as may be appropriate.*