

The Executive Chairperson
Planning Authority
St. Francis Ravelin,
Floriana

Date: 08/05/2026
ERA Ref: GF/00150/06

Dear Sir, Madam,

PA Ref.: PA/01398/23

Proposal: 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 800+; 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

1. Introduction

Reference is made to the application in caption, involving the Townsquare development at the site of the Old Union Club in Sliema, which is being assessed in relation to the approved development permit PA/01191/05. The latter was subject to EIA proceedings (as part of environmental assessment GF/00150/06) between 2007 and 2019. In 2023, ERA reviewed PA/01398/23, which initially involved:

- Introduction of an 11-storey hotel instead of the approved 3-storey pavilion and open landscaped area;
- Changes to internal layout, reorganisation of floors (mainly replacement of various double-height floors with single-height floors, to maximise floor space within same building envelope);
- Increase in total number of apartments (234 instead of 159) due to change in floor plans;
- Replacement of recessed top level of the tower with a full floor, and above-laying core with recessed floor level; and
- Changes to the site access (entrance from Hughes Hallet Street removed, all traffic to enter the site through Triq Qui Si Sana).

In view of the envisaged increase in traffic generation, an update of the Air Quality Study was undertaken (as an Addendum to the afore-mentioned EIA Report). Following review and a board decision in public, ERA's assessment and recommendations (including conditions) were issued in October 2023 as per Eapps docs PA/01398/23 – 168a-c. In November 2023, (non-executable) development permission for PA/01398/23 was granted by the Planning Authority.

2. Revisions to plans

The latest revisions to the plans of PA/01398/23 indicate some changes to the uses proposed on site, notably the omission of the previously proposed 11-storey hotel, and the re-introduction of the pavilion and an open landscaped area. The re-introduction of the pavilion is resulting in an additional 843 m² of proposed retail floor area (from 8,457 to 9,300 m²), while the food & beverage areas are reduced by 457 m² (from 1,971 to 1513 m²). The offices and apartments previously approved would remain unchanged, as well as the layout and massing of the other approved buildings on site.

A statement by the EIA Coordinator, (Eapps doc PA/01398/23 – 398a), assessed the proposed changes and concluded that these are unlikely to affect the findings of the previous EIA and its updated studies, based on the following main considerations:

- *Geology*: the site is already largely excavated and no changes to the excavation levels are proposed;
- *Cultural heritage*: no changes are proposed to the restoration of Villa Drago, in line with PA/01191/05. Villa Drago will remain free-standing, with its facades intact and no significant changes to the context of the Villa are envisaged;
- *Construction noise*: since the bulk of excavations have been completed and the majority of the project remains unchanged, the construction works will generate similar levels as previously assessed;
- *Traffic emissions (air and noise)*: given that access from Triq Hughes Hallet is removed, previously assessed noise effects on such receptor will not materialise. All traffic will be from Triq Qui-Si-Sana, and the latest plans (omission of the hotel) would result in a slight decrease in peak traffic flows and overall traffic generation, as compared to those estimates considered in the 2023 assessment. The previous findings of the noise and air quality studies remain unchanged; and
- *Visual amenity*: the removal of the hotel building is reverting the visual impacts of the development, as seen from various locations around the site, back to those assessed through the 2018 EIA Update for PA/01191/05. No new significant visual effects are foreseen.

3. Conclusion and recommended way-forward

ERA agrees with the EIA Coordinator's assessment, that the proposed changes to the approved development are unlikely to affect the findings and conclusions of the previous EIA. In this regard and noting the established development commitment through PA/01191/05 and PA/01398/23, the previous assessment conclusions, position and conditions as outlined in Eapps docs PA/01398/23 - 168a-c remain valid and are reiterated.

Yours faithfully,

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

Disclaimer

The above assessment results, the ensuing conclusions and requirements, are without prejudice to any required changes or updates should the development proposal be eventually modified again or should the information/assumptions provided turn out to be incorrect. Any deviations of the proposal from this submission would need to be re-assessed and the merits of this assessment would need to be reopened.