

**PA/01398/23 (GF/00150/06): COMMENTS RECEIVED BY ERA DURING PUBLIC CONSULTATION ON THE ADDENDUM TO THE EIA REPORT (Consultation period: 03 September 2023 – 03 October 2023)**

**A. Environmental Health Directorate (submissions dated 12 September 2023 and 03 October 2023)**

Comment
<p>There is no objection from this end provided that:</p> <ul style="list-style-type: none"> <li>• Applicant adheres with the copy of proposed sketch plans.</li> <li>• The volume of food preparation on site should commensurate with the size of the kitchen and the operator is to ensure food safety at all times.</li> <li>• It is imperative that once said development is approved applicant is to provide this office with detailed information related to the exact operation of all the catering/retail and accommodation business outlets within the proposed complex.</li> <li>• Proposed food outlets should be provided with suitable toilet/s. Toilets leading to food rooms should be provided with adequate ventilation and with an adequately ventilated ante room. Where natural ventilation is not possible, adequate extract ventilation by mechanical means is to be provided.</li> <li>• Prior to use, premises are to be regularly connected to the government main sewerage system, be provided with a supply of electricity and be provided with a supply of wholesome water from an approved source.</li> <li>• Height of proposed food rooms should not be less than 8ft (2.4m).</li> <li>• Proposed hotel should be provided with a number of adequate staff changing facilities.</li> <li>• Proposed grease trap (unless self-cleansing)/gully traps are to be located in the open air.</li> <li>• Loading bays leading directly to the storage area should be provided with an adequate ventilated space.</li> <li>• All food rooms including food stores are to be adequately ventilated. Where natural ventilation is not possible, adequate intake and extract ventilation by mechanical means is to be provided.</li> <li>• To provide adequate measures for the hygienic disposal of refuse. Passage-way used for garbage should not be the same used for foodstuffs.</li> <li>• Proposed cesspit/sump is to be made according to law. This should be of adequate size, easily accessible to a bowser all the year round for the purpose of emptying, made leak-proof and built in such a way as not to contaminate the surrounding area.</li> <li>• Applicant has to provide this Directorate a certification from a competent engineer/architect confirming that the cesspit/sump once constructed have been tested and confirmed leak-proof and that same have been constructed according to law and of the required size.</li> <li>• The Superintendent of Public Health reserves the right to order the abolition of the said cesspit/sump when he deems this is necessary and to order the connection of the drains to the public sewer or to adopt any other sewage drainage system.</li> <li>• Cesspit/sump is to be emptied regularly and in no way should foul matter overflow onto nearby areas. The material emptied from the cesspits/sumps by the bowser, should be discharged in the main public sewer at authorized points only, as directed by the Wastewater Unit within the Water Services Corporation.</li> <li>• Applicant should make all the necessary arrangements with a private consultant so that samples are collected as per LN 129 of 2005 and tested for microbiology and chemistry as required.</li> <li>• A pool safety operating procedure manual is to be made available according to regulation.</li> <li>• All pools (including jacuzzi) are to be duly registered with the Superintendent of Public Health and are to conform to the Swimming Pools Regulations, L.N. 129 of 2005.</li> <li>• Water system distribution for hot and cold water is to be sampled and tested for legionella bacteria from designated sentinel points as per L.N. 05 of 2006 prior opening an establishment and once every 6 months as per regulation and as per ECDC Guidelines of 2017.</li> </ul>

**Comment**

- Applicant is to take all the necessary measures to prevent above mentioned premises from being a statutory nuisance to neighbouring properties.
- All the relevant building and sanitary laws and regulations are to be strictly adhered to.

[Additional feedback received on 03 October 2023]

The Environmental Health Directorate (EHD) would like to submit the following comments/recommendations regarding this proposal:

- All drains are to be constructed and connected as per requirements of Chapter 10, Code of Police Laws.
- Measures in relation to legionella control as per LN 5 of 2006 Control of Legionella, amended by LN 262 of 2006 must also be carried out for the showers and changing rooms mentioned in the Green Transport plan.

**B. Malta Sociological Association (submission dated 02 October 2023)**

**Comment**

With reference to the latest development proposals at the Townsquare site in Sliema, the Malta Sociological Association is requesting EIA Malta to commission an ongoing social impact assessment. Previous versions of this project, including the one that was approved by the Planning Authority in 2019, had corresponding social impact assessments, but the plans have changed yet again, as per application GF 00150/06 (ERA) and 01398/23 (PA), which refers to an

"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; removal of the Pavilion building; introduction of office levels within double height areas in lower buildings; internal reconfiguration of office and retail areas; change of use of some Class 4C outlets to Class 4D.

As per Malta's national census (2021), Sliema is now Malta's most densely populated locality. Various social characteristics of Sliema have changed since the approval of the previous version of the Townsquare project. These need to be analysed scientifically through social impact assessment in an ongoing process, and in conformity to guidelines such as those of the International Association for Impact Assessment.

**C. Members of the public (submissions dated 08 and 18 September 2023, respectively)**

No.	Comment
1	<p>I wish to write my objection to the new Townsquare development.</p> <p>The people had already protested in a demonstration at Qui-s-sana about the height of the apartment block. In 2018 the Environment and Planning Review Tribunal upheld the Appeals. Now, it seems, that there are to be more apartments added. Plus there is now a second high building which is to be a hotel. This will bring even much more pollution, lack of sunlight and</p>

No.	Comment
	<p>fresh air to the surrounding residences. This apart from the constant deliveries necessary for a hotel.</p> <p>The plan is in the midst of apartments already built on roads surrounding the plot. Therefore the new buildings with exaggerated heights will add to the lack of air, sunlight and pollution, as Tigne Street is narrow, and the once pleasant area is now already suffocated. (I lived in a one storey detached house and garden there, so I know what we have lost).</p> <p>Infrastructure, the most important survey before building these high-rise horrors, was/is non existent. How are the drainage, electric cables. Water distribution etc. going to cope with the demand? The quality of life is already compromised, let alone if this suffocation is added to the area.</p> <p>Traffic, already a huge problem, will increase. It takes twenty minutes to exit Sliema from this area by car. It will only get worse with more building. Hotels and shops will need constant trucks to deliver their goods, as they already do. Why try to ruin what was pleasant about our Island? Why not improve the so many places that need arranging and upkeeping?</p>
2	<p>The introduction of a hotel in an area previously reserved for an open space with no buildings close to Hughes Hallett street is an extreme revision from the original approved plan and an entire reassessment of the project must be held to ascertain the impact that this will have on environmental quality and logistical bottlenecks, and if so, the modification must be rejected.</p>