



Adi Associates
Environmental Consultants Ltd
Kappara Business Centre
113 Triq Birkirkara
San Gwann SGN 4197, Malta
Tel/Fax +356 21378172 / 21378177
info@adi-associates.com
www.adi-associates.com

Our Ref: STS006

30th September 2015

Malta Environment and Planning Authority
Attention: EIA Team (Ms Charlene Smith)

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 revised, and as currently being submitted to the Malta Environment and Planning Authority (MEPA), 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 as submitted to MEPA (refer to plans uploaded to MEPA on 6th July 2015) for the development of Sliema Townsquare. The master plan is found in **Appendix I** (a full set of plans is available at MEPA). The proposal is hereinafter referred to as 'the Scheme'.

Background

3. As a background to the Scheme, it is noted that 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 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 were made to the Scheme as follows:
 - Number of residences – 181 apartments (34,800 m², excluding terraces);



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- Offices – 4,719 m²;
- Retail – 9,105 m²; and
- Parking – 721 spaces.

7. The general massing of the proposed project, together with the location of the tower remained unchanged. The car park entrances and exit points remained unchanged, however, the internal circulation changed due to the new structural elements that were defined in the parking levels.
8. 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 PA1191/05 and its Updates and Addenda.

2015 proposed changes to the Scheme

9. Following further discussions with MEPA, the Scheme has again been revised as follows:
 - Number of residences – 163 apartments (33,277 m², excluding terraces);
 - Offices – 4,719 m²;
 - Retail – 8,241 m²; and
 - Parking – 773 (parking provision can potentially be increased to 800 parking spaces as the layout may accommodate 2 and 3 car garages which are currently not included in the design).
10. The figures show that the number of residences, offices, and retail areas have been reduced from the original EPS while the car parking spaces have remained the same. The general massing of the project and the location of the tower has remained unchanged as its location had already been defined in previous studies. The east side of the development has been re-designed to implement a less congested design in the lower floors of the development. In this way, the majority of the apartments that were originally located adjacent to the tower building and which formed part of the base of the tower have been removed. The tower now starts from Level 0. The heights of the buildings vary from two double height commercial levels in the Villa Drago area, to an overlying additional 5 office levels in the central commercial avenue area. In the residential area, the levels vary from 8 to 15 levels on the side building which are close to the tower area, reaching up to 38 and 36 in the central tower itself. The proposed design results in a sleeker tower, albeit still based around the radial concept originally submitted. The periphery pedestrianised road has been brought inwards to pass around the base of the tower and is still directly linked to the main commercial avenue, to ensure a more open feel when walking around the development. The redesigned pedestrian road has resulted in an increase in the overall open space of the project. The car park entrances and exit points have remained unchanged, however, the internal circulation has changed due to the new structural elements which have now been defined in the parking levels.



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Impact assessment of new proposal

Geo-environment

11. In terms of geology, the impacts remain the same since it is envisaged that the same volume of material will be excavated. As stated in Chapter 5 of the 2007 EPS, the waste to be excavated will either be reused or dumped in an approved quarry. This will be described in more detail in the eventual Construction Management Plan.

Cultural Heritage

12. In terms of cultural heritage, the main impacts previously identified were on Villa Drago. In the EPS, it was stated that:

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, current plans for the Villa are for it to remain freestanding and the facades to remain intact. The Scheme provides for the façade accretions added over the years to be removed and the Villa 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 is judged to be not significant. The restoration of the facades and the interior of the Villa, and the carrying out of structural repairs that are vital to the structural integrity of the building, are of major beneficial significance.

13. The architects have confirmed that the above still holds with the current Scheme, although the current proposal also includes the raising of the open area to the North and East of the building. A restoration method statement has been prepared by Perit Edward Said (and has already been submitted to MEPA). In terms of the intervention at the basement, Section 3 of the method statement states

As a Grade I listed site, strict conservation interventions must be adhered to however ensuring that it is given a suitable adaptive reuse. Generally speaking the fabric of the villa building is very well preserved, including substantial extents of the finishes. Every effort should be made to restore these as described in the following section.The proposed one-floor raised public space on the side and back would see the formation of an elevated walkway cover the basement level of the house with a gap allowing for ventilation. It is felt that this will not be detrimental to the villa building, but actually would improve the proportions of the side and back elevations once restored. The back terrace is of little architectural significance and the staircase leading down to the garden is a relatively recent construct. The terrace will be incorporated in the new raised public platforms whilst the staircase will be removed. As indicated in the proposed drawings parts of the said platforms will be planted with trees that will be able to grow to maturity.

14. As stated by Perit Said this intervention is not expected to be detrimental to Villa Drago.
15. With regards to the alteration of the context of Villa Drago, the architects note that the nearest buildings in the Scheme will be 8.8 - 11 m from the nearest façade of the Villa, which is still in line with the planning permission granted under PA 00470/00. They also note that the height of these proposed buildings within the curtilage of the Villa is less than the height



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of the existing and proposed third party buildings in the surrounding area. The alteration of context is therefore judged to be not significant, as it was assessed in the original EPS.

Air quality

16. In terms of air quality, the 2012 EPS Addendum considered the following Annual Average Daily Traffic (AADT) generated by the Scheme: 4,240. The total amount of traffic generated by the Scheme + network traffic was 27,627. Based on the same assumptions and methodology and taking account of the proposed land uses, the predicted AADT from the Scheme is now 3,503; the traffic generated by the Scheme + network traffic is now estimated at 26,889. Given that the AADT is less than was assessed in the 2012 Addendum, the impact on air quality is expected to remain similar (or slightly improve) to that assessed in the EPS Addendum. The current proposal, therefore, will not affect the findings of the 2012 EPS Addendum and impacts remain unchanged.

Visual Assessment

17. In terms of the visual amenity, a visual impact assessment has been undertaken (see **Appendix 2**). While most of the impacts have remained similar to those in the original EPS, the view from the Gzira promenade (VP2) has now been assigned as major (in the 2007 EPS it was minor), the viewpoint from Valletta (VP3) is moderate (in the 2007 EPS it was minor), and the viewpoint from is-Sur ta l-linglizi (VPI1) is moderate (in the 2007 EPS it was minor). Two additional viewpoints were also included in the assessment from Kalkara.
18. Landscape impacts remain unchanged.

Land uses

19. The social assessment also remains similar, because of the similar land uses proposed to those assessed in the 2007 EPS, as well as the similarity in the height of the buildings.

Conclusion

20. On the basis of the above, it is concluded that, with the exception of the visual assessment, impacts from the proposed Scheme remain the same as those assessed in the 2007 EPS and its subsequent Addenda.
21. In terms of cumulative impacts, these would mainly arise from the development itself and from the interaction with other proposed developments in the area being built at the same time as the Scheme. The former impacts have been assessed in the 2007 EPS and these remain unchanged. In terms of the interaction of impacts from proposed developments in the area, these are difficult to predict. Although a major development on the peninsula is the proposed 40-storey hotel development at the site of the former Holiday Inn near Fort Cambridge, this is still at planning stage and has no valid development permit.
22. Impacts would arise during construction from dust, noise and construction traffic although given that the two developments are at different planning stages and considering that the Fort Cambridge development is unlikely to require substantial excavation, the impacts may not overlap. Operationally there would be additional traffic, although the AADT of the proposed development at Fort Cambridge that would be passing along Triq Qui Si Sana is



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unlikely to affect the assessment carried out in the 2012 EPS Addendum on air quality. This is because the Air Quality Assessment described in the 2012 EPS Addendum was based on an AADT from the Scheme of 4,240 whereas the current AADT is 3,503. Any increase in traffic along Triq Qui-Si-Sana by new developments in the area that generate an AADT of up to 737 will not affect the findings of the 2012 EPS Addendum.

23. In terms of the cumulative visual impact it is anticipated that only viewpoints 1, 2, 3, 11, 12 and 13 would be affected – mainly through an increase in the magnitude of change of the view (receptors would be the same). While viewpoints 1, 2 and 12 have been assigned a major or moderate to major impact, and are therefore unlikely to change, it is possible that viewpoints 3, 11 and 13 could become major as a result of both developments.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "R. Xuereb", written over a faint, light blue circular stamp.

Rachel Xuereb
Director, Adi Associates



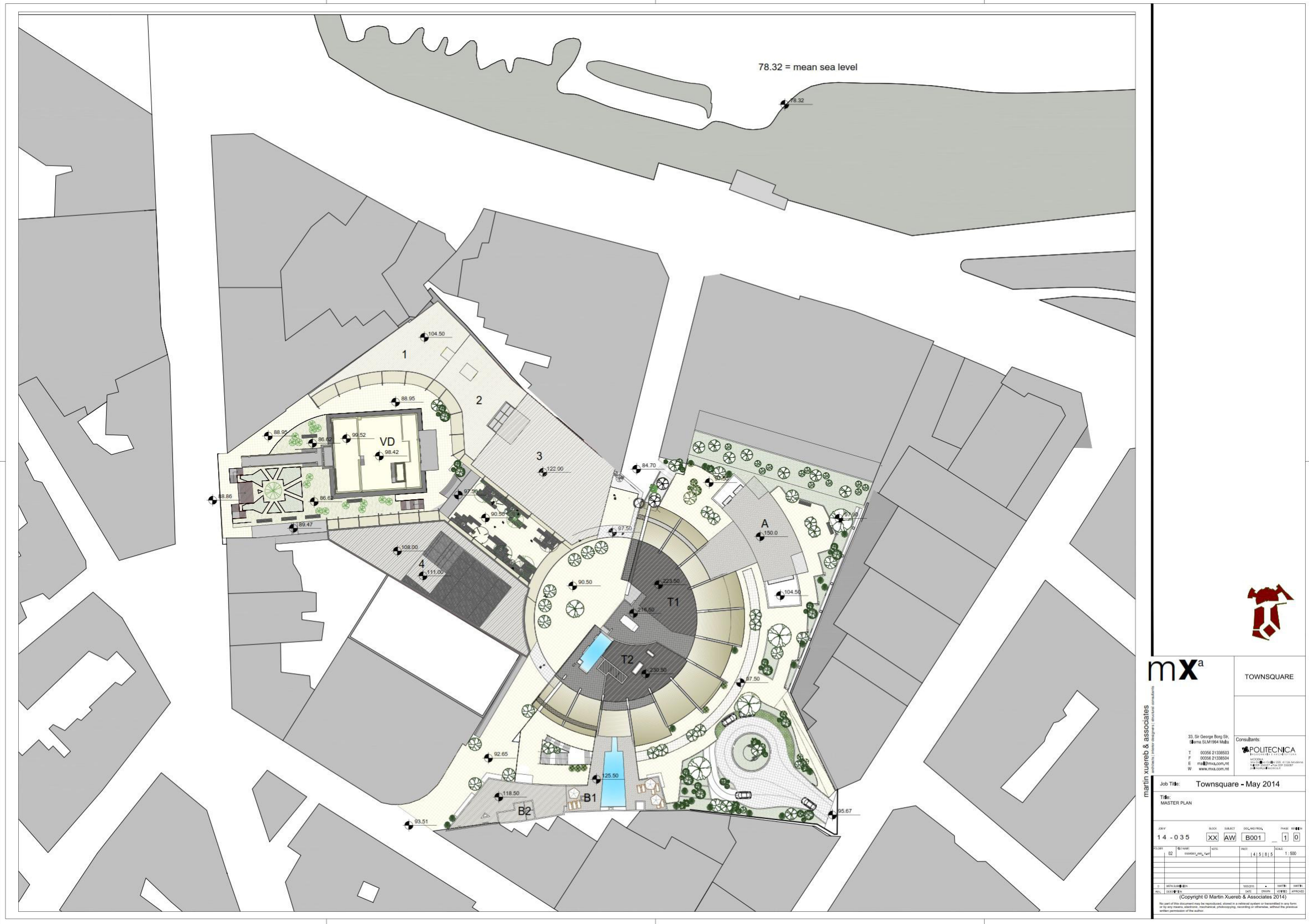
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Appendix I: Proposed plans



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Figure I: Proposed Master Plan





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Appendix 2: Visual Impact Assessment