



**TAS-SLIEMA**

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## **REACTIONS OF SLIEMA LOCAL COUNCIL TO THE CASE OFFICER REPORT FOR THE TOWNSQUARE TOWER.**

- 1) The Council appreciates that a representative of the Council shall sit on the board to decide the application PA01191/05;
- 2) The Council points out a lack of transparency on documents related to the Traffic Impact Statement. The case officer report refers to three documents on traffic 390, 409, and 487. All three documents were unavailable on the online file system and had to be requested by Council. This concealing of documents is highly suspicious and in breach of the Aarhus Convention. One of the documents is the MEPA Assessment of Simplified Traffic Statement dated 26th October 2015 – this was only uploaded for public access two days ago and only after Council requested it. It is unacceptable that such an important document dating back to October 2015 was concealed from registered objectors;
- 3) A fourth document which dates to May 2016, the Traffic Impact Assessment Addendum prepared by the developer has to date not been uploaded, notwithstanding countless requests by Council. It is unacceptable that this document is still not available to the Council;
- 4) In a previous objection, Council had pointed out that the Floor Area Ratio Policy states that 'Where there are concurrent proposals for other tall buildings, or where others are likely to follow, the implications of these should be addressed as well' (6.6). Neither the Townsquare Environmental Planning Statement nor the related updates/addenda in any way consider the development of the Fort Cambridge 40-storey hotel proposal. While the Fort Cambridge proposal is still in screening stage, it needs to be emphasized that the Project is at an advanced stage, in fact an EIS has already been presented. It is also pertinent to point out that the Fort Cambridge Hotel EIS included considerations of the impact of the Townsquare project in line with the FAR Policy. The PA

cannot impose Article 6.6 on the Fort Cambridge developers while exempt the Townsquare developers from Article 6.6 as this would be tantamount to favoritism and unacceptable arbitrariness;

- 5) When assessing the Council's Objection in reaction to Point 4 above the case officer report simply stated that the FAR Policy document considers the Tigne peninsula as an appropriate strategic area for the location of tall buildings. This is a partial reading of the FAR Policy. Articles 2.3 and 2.4 state that a detailed urban design study/ character appraisal was not undertaken by MEPA of the identified locations. The FAR Policy further states that, *'it is not appropriate or practicable to develop a policy, which delineates detailed boundaries for the appropriate strategic locations or is prescriptive about which specific sites within the identified strategic locations are, or are not suitable for tall buildings, nor to indicate a maximum number of such buildings which will be permitted in any specific strategic location, nor a maximum height. (...)*  
*The policy therefore places the onus on the developers to make the case for a tall building in the context of an urban design study/character appraisal prepared by them '.* The studies need to include other proposed developments. The Council deems it to be unacceptable that the Townsquare studies are ignoring Article 6.6;
- 6) The Case Officer's report failed to assess any of the traffic related issues. The Studies presented by the developer provide conclusions which are totally unrealistic. The Assessment of Simplified Traffic Statement states that *'when comparing 2014/2015 to 2005 overall there has been a decrease in traffic during peak hours to/from the Tigne Peninsula'*. This assertion was based on a traffic count of Tower Road and the Strand. The Council maintains that this assertion that traffic has decreased in the last decade to be a claim which is totally unrealistic and is highly irresponsible.
- 7) The TIS only takes into consideration the traffic in Tower Road and the Strand when the roads which will be most affected by this development is Qui-si-Sana Sea Front as well as the inner roads of Tigne.
- 8) The Council reminds the Board that the planned 40-storey hotel earmarked for Fort Cambridge estimated an additional 1,527 vehicles per day. When taking into consideration the Townsquare additional car trips, in all there will be an increase of 5,768 in daily car trips on the one-

lane road of Qui-Si-Sana Sea Front. The case officer report points out cosmetic changes in this road which include the shifting of a bus stop and the removal of ten parking spaces available for the public. The present road infrastructure in Sliema, and in particular in Tigne will not be able to handle this influx with traffic expected to come to a halt, having a spillover on the rest of Malta. Far from having a negligible impact this will result in serious health and economic repercussions;

- 9) The impact of vehicle emissions on residents was initially considered major, but lo and behold, this was subsequently revised to 'negligible' in the EPS Update Addendum. This is not credible in view of the faulty biased conclusion that traffic has decreased in the last decade;
- 10) Art. 5.9 of the FAR Policy states that *'Tall buildings should not have an adverse impact on the transport infrastructure, particularly public transport provision, especially at peak travel flows'*. The issue of public transport is never mentioned in the reports made accessible to the Council and neither was it raised by the case officer.
- 11) Art. 5.9 also states that *'the developer shall fund measures to encourage sustainable travel behaviour in the form of a 'Green Travel Plan'*. Such a Plan was not submitted and therefore there has been no calculation of the fund required for such a Plan. The Council will not accept any cherry-picking of the FAR Policy and stresses the importance of the Green Travel Plan in assessing the sustainability of this Project.
- 12) The Case Officer report points out that 982 parking spaces are required, however 748 parking options are planned. This means there is a shortfall of 234, not to mention the 10 parking spaces which will be removed from QSS Sea Front. The Case Officer report fails to comment on this considerable lack of parking provision. The Council reminds the Board that Art. 5.9 of FAR states that *'the shortfall in car parking spaces may be provided on an alternative site which shall not be located more than 250m away from the site of the development'*. Clearly the FAR expects a full provision of car parking spaces.
- 13) When assessing the social impact, the Planning Directorate requested clearance from the Dept of Social Welfare Standards and the reply given was that *'the project is of an infrastructural nature and thus does not fall within the social impact assessment remit of this Ministry'*.

It is unacceptable that to date no central government entity has made an assessment of the social impact of this project.

- 14) Last, but absolutely not least on the crucial issue of the impact of this Project on the drainage system, the Case Officer report does not delve into the issue which reflects the superficiality of case officer reports on Tall Buildings. The Report states that the WSC were consulted on the 20<sup>th</sup> July 2015 and yet in the case officer report (point 4.5.12) published almost one year later, in June 2016, it is stated that no reply was received to date and that therefore the Planning Directorate is considering that the WSC has no objection. It is unacceptable that on the crucial issue of the impact of this project on the drainage infrastructure, the WSC, the authority on drainage, has not given any assessment. The Council maintains that the Project cannot be assessed without the consultation reply from the WSC. Should the drainage infrastructure not cope, this will spell environmental and economic disaster for Malta.