



**St George's Park Co Ltd**



**FOLLOW-UP SUBMISSIONS**

to the  
Interim submissions  
dated 28 November 2016  
regarding the Masterplan  
in the  
**Paceville Development Framework**  
September 2016

**6<sup>th</sup> December 2016**

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## Introduction

The Company has already made representations to the Environment and Development Planning Committee (the Standing Committee) as carried on the Malta Government's website <http://www.parlament.mt/relateddocuments-env>, namely:

- Dok. 50 – *Summary of concerns St. George's Park Co. Ltd.* (Laqgħa Nru. 29)
- Dok. 52 – *St. George's Park Co. Ltd – Interim submissions regarding the Masterplan in the Paceville Development Framework* datat Settembru 2016 ipprezentat mill Baruni Peter Paul Testaferrata Moroni Viani (Laqgħa Nru. 30)
- Dok. 53 – *Pender Place/Mercury House Approved Development Brief Malta Environment and Planning Authority March 2005 Comments Relating to the Approved Development Brief 2005 to the Paceville Development Framework 2016* ipprezentat mill Baruni Peter Paul Testaferrata Moroni Viani (Laqgħa Nru. 30)

The said three documents form an integral part of these further, follow-up, submissions.

The present document is intended to serve as a follow-up also in regard to a meeting at the Planning Authority as had been opportunely facilitated during the Standing Committee's meeting of the 28<sup>th</sup> November 2016 by the Parliamentary Secretary for Planning and Simplification of Administrative Processes in the Office of the Prime Minister, The Hon. Dr Deborah Schembri (hereinafter referred to as the Parliamentary Secretary) pursuant to:

{a} a declaration being made by the PA during the Standing Committee's proceedings that all requests by residents for a meeting with PA had been accommodated;

{b} our insistence that our own requests qua owners of certain apartments, in concert with other resident owners, had not in fact been so accommodated.

{c} the PA's explanation that this was not accommodated because the PA did not feel it was appropriate to meet residents who were potential developers together with individual residential apartment owners

{d} our protestation that the PA had therefore lied to us when, on attending at their premises for a meeting that we were not allowed to attend, they had told us they would give us another appointment, which never materialised

{e} our continued insistence that we did not wish to meet behind the residents' backs.

The said meeting has since been duly held on the 1<sup>st</sup> December 2016 at the offices of the PA.

The Director of Planning Perit Christopher Borg and Mr Joseph Gauci, Forward Planning Unit Manager were present on behalf of the PA while the Company was represented by Mr Peter Paul Testaferrata Moroni Viani and by Ms Caroline Zammit Testaferrata Moroni Viani who were also accompanied by Mr Giancarlo R. Tolu a resident at St George's Park who had also complained at the said meeting of the Standing Committee of not having managed to procure the direct meetings that had been publicly announced by the PA.

## Preliminary comment

It is only proper to record the courtesy and attention accorded by the PA officials during the aforesaid meeting as also our appreciation, in particular, for their efforts to address the serious misgivings that our earlier representations have highlighted.

Even though it cannot be said that matters have been resolved, and indeed it would have been overly ambitious to expect that that could so readily occur, the meeting did very positively seem to offer the mutually beneficial collaborative prospect augured in the concluding comments of our Interim Submissions <sup>Dok 52</sup> where we had commented that:

*To progress further the positive note, we are confident that with goodwill a solution should be possible as from our experience it is possible to liaise effectively with Government Ministries who are amenable to listen and provide guidance driven by what a responsible administration cannot but prioritise, namely the common good, which it is always helpful to have outlined in an 'Approved Document' such as the Strategic Plan for Environment and Development - July 2015 (SPED 15).*

This document seeks to build on that prospect albeit without prejudice to the serious misgivings that have been of such concern to us over the past weeks.

The following comments therefore concentrate on the welcome clarifications which we understood to have been established in principle, but without abandoning the concerns that we cannot but continue to retain at this stage and which we also try to explain better so as to facilitate their resolution and rekindle our enthusiasm for the benefits that a revised Masterplan can so very well produce in line with the Government's ambitions.

## The clarifications

### Redefining the St George's Park (SGP) site

#### Redefining at macro level

At a macro level the SGP site is to be distinguished as comprising two unrelated portions, namely:

- The residential portion currently housing 400 residents (as per the SGP Residents Association's independent submissions) in 121 apartments. All the residential apartments overly car ports that, together with the underlying land, belong to St George's Park Co Ltd (SGP).
- The portion exclusively owned by SGP currently containing various commercial properties owned by the Company and incorporating sundry thriving leisure oriented businesses owned and operated by third parties qua lessees as well as stores / garages block to the north east of the residential blocks / certain tracts of undeveloped land adjacent to Spinola / Verdala / Manoel blocks and the land providing internal access roads and open spaces around and facing the residential blocks.

#### Redefining at micro level

At a micro level:

- a) the residential portion has to be broken down into the 5 portions on which the various apartment blocks are constructed, namely:
  - Rohan
  - Manoel,
  - Verdala,
  - Vendome,
  - Spinola

*(site plan on the next page identifies these blocks by way of colour coding)*

b) the SGP-owned portion has to be broken down into five portions, comprising the Aragon House Business Centre site which was recently developed and four other site portions which are still amenable to redevelopment, namely:

- Site 1 Aragon House Business Centre site (redeveloped in 2012)
- Site 2 housing the La Vallette Resort Complex,
- Site 3 housing part of the St George's Park Resort Complex,
- Site 4 containing the aforementioned undeveloped land, and
- Site 5 housing part of the St George's Park Resort Complex

*(site plan below page identifies these blocks by way of colour coding in the case of Aragon House and by name in the case of the four sites amenable to redevelopment)*

### Restating the redevelopment criteria

#### Re the residential portions

Each of the aforementioned residential blocks will be capable of individual redevelopment independently (as to footprint and timing) of any of the other residential blocks or indeed the rest of the SGP site provided that the existing conditions regarding footprint, permeability, height, aesthetics and use remain the same

■ Aragon House    ■ Rohan Block    ■ Manoel Block  
■ Verdala Block    ■ Vendome Bldg    ■ Spinola Block



The time when each individual block may be redeveloped will of course depend on all the residents of the same block being in agreement but practical considerations could also intervene should it not remain a viable option to maintain, but become desirable to redevelop, these reinforced concrete frame structure type buildings.

### Re the SGP site

The four sites are to be developed in phases independently of each other and in such order as SGP may determine depending on its ongoing market assessments over time.

SGP will not be committed to undertake any or all of the phased redevelopments by any given date but will be obliged to do so, as and when deciding to proceed, on the basis of an overall redevelopment brief as is to be agreed and which will endure till completion of the last phase.

The planning driven parameters regarding 'view corridors' will be deemed to be satisfied if the FAR requirements for tall buildings are respected as these will of themselves provide for enhanced view permeability. This will be better evident when the location of the tall buildings is precisely established.

In this regard, while it has to be guided by the advice of its architects as to the best strategic location for the tall buildings from the aesthetic and technical viewpoints, SGP has every intention, and indeed commits, to seek to ensure that the open space prospects currently enjoyed by existing residents will not be materially prejudiced and, if possible, enhanced.

The sustainability driven parameters which SGP feel to be paramount considerations for a prudent investor had previously been communicated to the PA and are further referred to separately later on in this document.

However SGP take this opportunity to reiterate their commitment given to the Prime Minister in August 2015 that each redevelopment phase will include the use of floor areas as a hotel as an integral part of the project and thus not subjecting that use as a hotel to the delays that the PM expressed concern about.

It also bears stressing at this point that despite that SGP feels that it prudently has to reserve to its discretion the timing of implementing the various phases, SGP will have a strong commercial incentive to complete all phases due to its proposal to undertake the construction of the tunnel to its on-site car park(s), subject to the Government providing a route that does not impinge on private property.

It is also relevant to mention in this regard that while each phase will seek to provide an independent destination venue as described in the FAR Policy they will all share common services below road level and indeed contributing to the connectivity recommended in the FAR Policy.

In discussion the point was made by the PA that it was important to proceed on the basis of a comprehensive redevelopment brief so that the PA could be aware of, and be satisfied with, SGP's vision for the aforesaid Sites, 2, 3, 4 and 5 as indicated on the preceding page.

This concern resonates with SGP's own need to be sure that what is eventually agreed will, as already stated, endure till the completion of the last phase and accordingly all the procedures required at law (such as the SEA and subsidiary or other requirements) would also be suitably addressed and satisfied up front. The investors, and indeed the Paceville area itself, cannot afford to have a project of this size and central importance fail by reason of being subject to eventual bureaucratic interventions that can delay implementation if not prejudice the overarching vision that, on agreement, would be shared by all.

## Revisiting SGP's already expressed concerns

The misgivings expressed in our earlier submissions cannot but endure until the cause for those concerns is irrevocably removed.

The meeting at the PA on the 1<sup>st</sup> December 2016 has nevertheless, as already stated, opened up the prospect of this becoming possible in the next stages of the consultation process and we look forward to being proved correct in thinking that that meeting has started us on the right track.

It would be trespassing on the reader's time (and patience?) to repeat what was said in our earlier submissions but we do feel that it could be useful, moving forward, to mention certain key aspects that may not emerge clearly enough from those submissions, and could be dealt with only lightly on the 1<sup>st</sup> December.

## Re public open spaces

It is clearly observable that even though no such distinctions are drawn in legislation or indeed the FAR policy itself there are different types of 'public open spaces'.

For example the Spinola Palace Garden is a public open space that is managed and therefore subject to certain conditions, mostly to guard against the anti-social behaviour that the Masterplan itself complains of. It is the right type of public open space for that particular location and situation. It could perhaps, even then, however, not yet provide a sufficiently rigorous oversight as would appear to be appropriate where one is seeking to establish a high end destination as per the FAR policy's aspirations.

While therefore amenable to a Spinola Palace Gardens arrangement (particularly if a covered space such as in the Piano building at City Gate qualifies as a public open space) SGP will wish to discuss this aspect further with a view to better assure an ongoing well-kept and attractive environment that is also secure, security being a paramount consideration.

## Re the tunnel

The FAR Policy, resonating with SPED 15, stipulates that car parking must be provided on site in tall buildings.

This was always SGP's intention and indeed this is why SGP had proposed the tunnel that is contemplated in Option 2 but dropped in Option 3.

SGP are convinced that they are not the only long standing investors in this area who believe that the tunnel is the best solution to mitigate the various serious concerns that have been voiced by neighbouring localities and facilitate the high end pedestrianised environment aspired to in the Masterplan as also satisfying the expectations of the targeted high end 'users' (be they residential or commercial).

With a view to containing costs and in true PPI cost-containing spirit SGP have always maintained and still stress that they will wish to have direct control of all infrastructural works as are agreed to be necessary for the due and proper establishment of their project. This applies also to the tunnel which of course will have to be undertaken on the basis of well agreed parameters and possibly also provide the relevant authorities to re-route certain services without causing much disruption to existing services and facilitate a seamless switch.

## Re Building heights, floor areas and land use

### Building heights

The earlier representations submitted in Standing Committee, in the documents tabled there and which form an integral part of these Follow-up submissions, stressed the point, also made by the Hon C Buhagiar in Standing Committee (at the 28/11/2016 sitting), that the redevelopment of a site was optimised when it was possible to consolidate various adjoining properties and it therefore did not make any sense to fragment the site owned by SGP in the casual way envisaged in the Masterplan, with the draconian results that we have highlighted.

Obviously, the larger the site the greater the flexibility in allowing for tall buildings as the larger sites can better accommodate the taller heights.

Apart from aesthetic and environmental considerations, how tall the buildings should be on any particular site (or a combination thereof as envisaged by SGP for their own cohesive site) will be driven by financial determinants which derive from the gross developable floorspace required to assure a project's viability. There should not be an arbitrary cap on the height that can be developed as this will artificially restrict the economic potential that can be leveraged by the taller buildings and which certain investors who take a long term view could well be encouraged to consider undertaking.

This aspect is addressed in the next section from which it will be seen that in August 2015 it had been left that the height should derive from the agreed total GDF per tall building and the relevant footprints with no height limitation per se being conditioned by the (ME)PA at that time.

However it remains that the best formulae for developing the overall SGP site depends on the planning flexibility denied by the Masterplan being duly reinstated on the lines of the aforesaid Clarifications.

Thus, subject to the aforesaid clarifications on this aspect being formalised, SGP will be able to liaise further with the PA as to the parameters in which they can usefully engage with their architects to provide the 'vision for the area' as mentioned by the PA, and as indeed are also needed to be able to address the feasibility factors.

SGP will look forward to this trusting that they will be accorded the same amenability as seems to be readily available to other developers who do not appear to be shackled by the same constraints which bedevilled the redevelopment of the Aragon House Business Centre (where 7 floors had originally been insisted on by the PA before finally allowing 9 floors with a setback on the 9<sup>th</sup>).

As already mentioned above, in August 2015 it had appeared that these erstwhile difficulties could be overcome but the Masterplan has materially deviated from what had been discussed in August 2015, and this cannot therefore but be of severe concern as it only serves to reinforce somewhat exponentially past disappointments.

It is perhaps relevant in this regard to highlight that this disappointment is quite evidently shared by our architects who have written directly to the Executive Chairperson to express their disillusionment with the discriminatory fashion in which the Masterplan formulation process has been conducted. A scanned copy is attached as an Appendix.

It is for the authorities to determine whether they consider the concerns expressed by Studio Libeskind (whose international achievements include being "selected as the master planner for the World Trade Center redevelopment" <sup>New York</sup>) to be given their due weight.

### Floor areas

Our earlier submissions have shown that the 233,000 sq.mt of GDF should be considerably increased even just by applying the same criteria that have produced the GDF allocated to other sites.

The point was already also made in those submissions that the higher cost of building tall buildings so as to generate the environmentally desirable and liveability-friendly open spaces within a self-contained environment as recommended in SPED 15 also make a strong argument for a sufficient GDF to be made available.

A further point derives from the cost of tunnel arrangements as contemplated at Option 2 of the Masterplan, keeping in view what SGP's outline project had proposed in this regard and is also referred to above.

The outline project as discussed and agreed in August 2015 had inter alia envisaged that the total developed footprint will not be less than 20,000 sq.mt (including the buildings to be retained namely Aragon House and Rohan, Verdala, Manoel, Vendome, Spinola blocks) while the Total Developable Floorspace area will not be less than 330,000 sq.mt, excluding the said retained buildings, the floor areas which are under the road levels, the floors areas above road level designated as car parks, the floor areas which are to be utilised as touristic accommodation (such as hotels, resort hotels, suite/apartment hotels, etc. and ancillary amenities) with SGP committing to dedicate not less than 33,000 sq.mt of GDF as touristic accommodation but with no capping as to the further amount of GDF which can be added for application to this particular use.

It also had been left that (ME)PA were to confirm that even the GDF area of all the floors designated as service floors would not be included for the purposes of accounting for the aforesaid 330,000 sq.mt of GDF which figure, it bears reiterating, is well within the proper GDF to be allocated to the SGP site if, as shown in SGP's Interim Submissions <sup>Dok 52</sup>, the parameters applied to other sites were also equitably applied to the SGP site.

### Land use

Our earlier submissions have already stressed the point that ongoing sustainability will depend on flexibility of land use over time and highlighted that, accordingly, the building structures will cater for that, the higher cost of doing so being viewed as paying insurance to assure the future.

The Appendices to our Interim Submissions (Dok 52) give the relevant details in this regard and SGP can but trust that it will be possible to liaise constructively with the PA and any other relevant authorities so as to be able to assure the ongoing sustainability of all that is being projected for the Paceville area, not just the SGP site.

### The expropriation issue

While, as already indicated, we have been encouraged by the positive meeting at the PA of the 1<sup>st</sup> December 2016 we feel that it is nevertheless important to make the point, also indicated in our earlier submissions, that certain development initiatives have been taken and further ones are still being prospected which are objectionable in principle and also damaging to us.

This was brought home to us by the Masterplan's proposed switch of the Paceville Plaza (in whole or in part) from the erstwhile public space at the Mercury House site to the SGP site which would involve the demolition of a hotel belonging to SGP and several thriving third party businesses.

Such a switch involves the abrogation of the public space condition imposed by the Government when it sold the Mercury House site as evidenced by the Pender Place / Mercury House Approved Development Brief 2005 which is still legally in force.

SGP cannot but deploy all legal measures at its disposal to protect itself from the deriving threat to its own property as evidenced by the Masterplan should such breaches continue to be entertained abusively by the PA.

In this regard we can but quote (albeit only very briefly) from GO plc's own objections to the proposed breaches of the said 2005 Development Brief

#### *OBJECTIONS TO PROPOSED DEVELOPMENT*

4. *GO objects to the development in question on the basis of the following:*

*(a) The proposed development infringes several provisions of the Pender Place / Mercury House Approved Development Brief of March 2005 ("the Brief") and fails to satisfy several other requirements of the Brief;*

*(b) Development has been undertaken on the site in question without the requisite development permission and/or in breach of the conditions of development applicable to the site at the time of said development;*

*(c) Prima facie the application in caption contains an error in the face of the record.*

5. *In its present form the proposed development would also adversely affect the civil rights of GO but, as this matter does not fall within the competence of MEPA, it will not be addressed here.*

*This note merely brings the matter of civil rights of GO to the attention of MEPA to make it aware of the possible consequences of, and to solicit due care and diligence in, its decision in connection with this application.*

It is of course irrelevant that GO are believed to have since withdrawn their objection after having got into bed with the proposers of the breach as they themselves have proclaimed in virtue of their Company Announcement that we drew attention to in our Interim Submissions <sup>Dok 52</sup>

Even on this aspect, nevertheless, it is trusted that appropriate watertight comfort can be derived from further liaisons with, and actions by, the PA.

### **Preface to Conclusion**

#### **Re PA Executive Chairperson's Interview Sunday Times 4 Dec 2016**

##### **The town planner – the overarching background**

One would have wished to end this Further Submission on the positive note that had concluded our Interim Submissions <sup>Dok 52</sup> and which had been picked up above under Preliminary Comment pursuant to the meeting with the senior planning officials at the PA on 1<sup>st</sup> December 2016.

One cannot, however, but hesitate to do so pending clarification of the overarching statements that the Executive Chairperson of the PA had made to us when we had been summoned to a meeting on 28 September 2016 and which he has repeated in TV interviews and most notably in an interview with the Sunday Times carried in that newspaper's 4 December 2016 edition.

One can understand of course that Malta's planner-in-chief will feel that it is incumbent on him to explain the issues and difficulties that accompany even the most well-meaning initiatives to promote the public good, sometimes even necessitating expropriation when this serves a public purpose.

In explaining what he put as the most common public purpose he mentions that of needing to construct roads and no doubt he did this because it is one that the general public can most readily relate to and understand.

However it would have been relevant and appropriate to add that each road has to be justified on the basis of the extent of the need for that road and whether that public purpose need creates a disproportionate burden on an individual. That is a more complex context and although we have already sketchily alluded to this in our earlier submissions <sup>Dok 52</sup> it can hardly be satisfactorily expanded on in a document such as this.

Nevertheless, it bears pointing out that town planners are subject to Ministerial and Parliamentary scrutiny and even Parliament (ie the State) is itself subject to scrutiny within the terms of the Constitution and, significantly, those of the European Convention Act <sup>Cap 319</sup>. Indeed what may seem justifiable at the PA in Floriana and in Parliament at City Gate in Valletta may well not seem so in the Courts further down the road or, indeed, in Strasbourg where the European Court sits.

### The negative overtones

The negative overtones stem from the possibility, clearly made manifest by the Masterplan, that one may indeed be left with no option but to seek to defend one's right by all available legal means.

Obviously when this raises the prospect of possibly needing to having recourse to high institutions, time can become the ally of those who seek to bulldoze their intentions through existing regulatory frameworks howsoever abusively these may then be adjudged to have been perpetrated.

This aspect cannot but be of serious concern when the planner-in-chief (who has been accorded extraordinarily intrusive powers in the Development Planning Act) declares that particular planning permissions can still be issued independently of the Masterplan which brings into play the caveat we have already indicated above with regard to Planning Permissions granted or contemplated for the Mercury House site, namely that *SGP cannot but deploy all legal measures at its disposal to protect itself from the deriving threat to its own property as evidenced by the Masterplan should such breaches continue to be entertained abusively by the PA.*

This is especially so in the light of the said planner-in-chief's reported comment that "*If anything one can argue that Mercury House was the one that obtained the least advantages*" from the Masterplan" which contrasts quite dramatically with the facts. Indeed, if the Mercury site owners are allowed to proceed with their project (already being sold on plan) they will have been advantaged at the expense of the public purse, which it is not within our competence to protect, but, very damagingly to us, also, as intended at our own manifest and significant expense which we are determined to defend from the knock-on effect of the Development Brief conditions being set aside as the Masterplan so casually proposes, notably the condition to leave all of the public space transferred for no value as a public piazza as outlined in more detail in our Interim Submissions <sup>Dok 52</sup>. It is disingenuous, to say the least, for the planner-in-chief to make this argument.

This defence will be mounted irrespective of who the 'influential persons' happen to be that are the co-investors with Mr Portelli. In this regard we cannot but:

A] reiterate the following comments made in our Interim Submissions <sup>Dok 52</sup>

*However the Consultants state somewhat differently that they relied on the facts and figures which had been provided to them by the PA.*

*In such circumstances the question arises as to whether conflicts of interest arise beyond just the Consultants which is the only instance that has thus far been openly debated and may yet be subject to censure.*

B] draw attention to the following companies both having as their registered address "J Portelli Projects, 1400, Block 14, Portomaso, St Julians:

*Company Registration Number C 76010 formed on 10 June 2016 named Mercury Contracting Limited and which changed its name to AJ Contracting Limited on 7 October 2016.*

*Company Registration Number C 77531 formed on 7 October 2016 named Mercury Contracting Projects Limited*

C] comment that what is to be inferred from the foregoing can be either naïve or insightful but we are deferring any such inference at least at this stage

Meanwhile it remains disturbing that Mr Johann Buttigieg has been reported to have said that "As a planner I am suggesting where the square and roads should be placed and as compensation you will get more developable space on the remaining area."

On this we cannot but again reiterate comments from our said Interim Submissions, namely:

*This was in stark contrast to how the PA approached the matter as evidenced by their assertion at the session of the Standing Committee held on 5 October 2016 that expropriated land could be compensated by the allocation of what they seem to deem ex gratia Gross Developable Floorspace (GDF). This is legal heresy.*

### The positive overtones

In the interview the PA's Executive Chairperson does nevertheless offer the following reassuring comments that resonate with the Clarifications reported earlier in this document and on which we await eventual formal confirmation.

- *We have assured people that expropriation will not happen if it is not in the public interest*
- *The mistake people are making is that they are assuming this plan is cast in stone. This is a first draft and we made this clear from day one. People are commenting and one association even roped in its own consultants to analyse the plan and its impact on a particular industry. This is how it should be. They may end up criticising us but I have no problem with criticism as long as it is constructive.*
- *We always insisted the master plan was a preliminary document. It is the first draft and was published as given to us by Mott MacDonald. Neither the authority nor the government touched a thing from it.*

## Conclusion

On balance, trusting that it is not naïve of us to do so, we conclude these Follow-up Submissions by auguring, as our Interim Submissions concluded, and as was reiterated above under Clarifications that *with goodwill a solution should be possible as from our experience it is possible to liaise effectively with Government Ministries who are amenable to listen and provide guidance driven by what a responsible administration cannot but prioritise, namely the common good, which it is always helpful to have outlined in an 'Approved Document' such as the Strategic Plan for Environment and Development - July 2015 (SPED 15).*



## Appendix

Studio Libeskind to Executive Chairman Planning Authority 6 Dec 2016

**STUDIO LIBESKIND**  
NEW YORK

December 6, 2016

Johann Buttigieg  
Executive Chairman  
Planning Authority  
St Francis Ravelin  
Floriana  
FRN 1230  
Malta

Via email: [johann.buttigieg@pa.org.mt](mailto:johann.buttigieg@pa.org.mt)

Dear Chairman Buttigieg,

I am taking the liberty to write to you as I have had the opportunity to read quite thoroughly the master plan which was issued. It is certainly a detailed document.

As you might remember, I wrote to you on June 14<sup>th</sup>, 2016 about articles appearing in the newspapers relating to hi-rise development in Malta and specifically, the Mercury House project. In those articles it was announced that the Mercury House had created realistic renderings, both internal and external with the aim of marketing their property. I asked you specifically if it would be helpful to do the same for the property that, as well you know, we were looking at for St. George's Park. The answer we received was to wait.

Indeed, that is what I have done. So you can imagine my surprise and consternation when what I read seemed so firmly to be giving the Mercury House project preferential treatment. The gerrymandering of the land, under the guise of giving public space to the Paceville area, in fact, manages to quite deliberately take the public space that had been loudly touted to be placed within the Mercury site and suddenly plants it in the development site of St. George's Park (SGP). Suddenly public space, which all of us knows is essential to a business district, is removed from one project, allowing it to have more development area to our SGP project, this restricting it to have less. This slicing and dicing, cutting and pasting with seemingly not rationale at all is extremely troublesome.

I am, therefore, lending my voice to what I see as a particularly harmful response to our client's interest in developing in this area. A client who has already proven to the isle of Malta that it is a substantial and reliable partner of significant consequence.

Sincerely,



Daniel Libeskind