

The Executive Chairperson  
Planning Authority  
St. Francis Ravelin,  
Floriana

Date: 12 August 2025  
ERA Ref: EA/00007/17

Dear Sir, Madam,

PA Ref.: PA/03218/25  
Description: Proposed addition of 7 floors and 6 floors to Towers A and B respectively (including Proposal: 1 duplex floor on each tower) to approved development in PA 3807/17. Proposal includes the addition of 76 apartments and 6 duplex apartments for a total additional 82 apartments.  
Location: Former ITS Site, Wesghet George Portanier, Triq il-Profes Walter Ganado, Triq Pietru D' Armenia, Pembroke and ix-Xatt ta' San Gorg, Triq Joseph Zammit, San Giljan

### **1. Introduction**

Reference is made to the project in caption, in relation to the City Centre development at the former ITS site near il-Bajja ta' San Ġorg, San Ġiljan. This development had been subject to an Environmental Impact Assessment (EIA) and an Appropriate Assessment (AA) in 2017-2018 (refer to <https://era.org.mt/era-project/pa03807-17/>, with updates in 2021 (consultant statements and updated photomontages) following downscaling of the project (reduction in height of the main hotel to 12 floors and the splitting of the 31-storeys residential tower into two towers of 17 and 18 floors each). At the time, ERA had communicated that the main significant effects of the project relate to the:

- Generation of considerable volumes of excavation waste and construction-phase disturbances (air, noise, vibrations) to surrounding land uses, as well as the nearby protected area (Pembroke Special Area of Conservation) due to proposed construction of the Triq Sant' Andrija tunnel;
- Risks of structural damage to Għar Ħarq Ħammiem;
- Degradation of the ambient air quality due to operational traffic emissions; and
- Permanent changes to the visual amenity of the surrounding area (both from short and long-distance views) and the cultural landscape of il-Bajja ta' San Ġorg area.

In view of the above, ERA had issued conditions addressing mainly the construction-phase, the associated envisaged disturbances, and the risks of damage Għar Ħarq Ħammiem.

### **2. Revisions to plans**

For the proposal under assessment which involves the increase in height of the two residential towers (from 17 to 23 storeys and from 18 to 25 floors, respectively), a statement by the EIA Coordinator on the effect of such changes on the previous assessment findings (including updated photomontages) was provided. The assessment concludes that the effects of the revised project in terms of land use/cover, landscape, geology, geomorphology, hydrology, ecology, cultural heritage and marine environment remain similar in significance to those previously assessed. With respect to visual amenity, air quality, noise and vibrations, greenhouse gas emissions and the wind microclimate, the significance of such effects is expected to be in between those assessed for the initial proposal and those of the 2021 revision. In general, the current assessment concludes that the overall findings and conclusions of the previous assessment remain valid.

### ***3. Conclusions and way-forward***

ERA acknowledges the development commitment on site, through PA/03807/17, with works currently ongoing on site.

Nonetheless, the project is still expected to lead to significant visual changes to the area. While the magnitude of such change has varied with the proposed height of the towers being revised throughout the years, the significance of the visual changes due to the introduction of high-rise development in this location was and remains major significant.

It should be noted that the above is to be read in conjunction with ERA's previous assessment and conditions for the wider project (refer to <https://era.org.mt/era-project/pa03807-17/>, also available from Eapps docs PA/03807/17 – 13596a-c), and does not supersede or revoke any of the requirements/conditions (including permitting requirements and construction-phase limitations/mitigation and monitoring) outlined for such application, which remain applicable.

Yours faithfully,

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

#### ***Disclaimer***

*The above assessment results, the ensuing conclusions and recommendations 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.*