Statement on EIA carried out on PA 2470/16 & PA 6097/20, as updated by PA 4313/25

Project Landmark - PA/04313/25: Construction of a mixed use 40-storey tower (Triq Elija Zammit) making use of FAR policy for tall buildings. The proposal will include 4 basement levels comprising of car parking, storage, plant areas and water reservoirs. The tower will consist of the following mix of uses: Class 1 residential apartments, Class 3B hotel (hotel rooms and serviced apartments) including hotel amenities (pool areas, restaurants, event halls and rooftop bar), Class 4A offices, Class 4B Retail, Class 4C & 4D Food & Beverage and dedicated spaces for technical services at different levels of the tower. The proposal also includes an open piazza with hard and soft landscaping, a retail and F&B pavilion directly connected with basement levels, public seating, ventilation vents and tables and chairs associated with F&B units. This proposal further consolidates the site from the previously approved permits PA/02470/16 and PA/06097/20 and will increase further the site area to provide a comprehensive scheme.

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Introduction and Document Layout

1. The proposed Project Landmark development consists of a tower structure, replacing the tower approved by the Planning Authority through development permit application PA 2470/16, for the '*Demolition of existing dwellings and construction of phase one of comprehensive project including excavation and construction of underground parking'*, and PA 6097/20 – '*Construction of phase 2 of comprehensive development (making use of FAR policy for tall buildings), following approval of PC 81/18, including 4 basement levels of parking facilities, Class 4B and Class 4D activities at lower levels -2 and -1, entrance lobbies at level 0, overlying Class 4A offices spread over 11 floors, Class 4D outlets and MEP services at mid-height, class 3B hotel spread over 2 floors and overlying serviced apartments ancillary to the said 3B spread over 12 floors, ancillary uses and MEP services at the topmost levels'*.

2. An Environmental Impact Assessment process (EA/00046/18), as per the Environmental Impact Assessment Regulations (S.L. 549.46), was carried out to evaluate the project as defined within the development permit applications for PA 2470/16 and PA 6097/20. Given the recent development permits listed above, the Environment and Resources Authority (ERA) requested *'a statement in your capacity as EIA Coordinator on whether such proposed changes to the approved development are likely to affect any of the findings and conclusions of the EIA Report drafted in 2021-22, supported by a comparison between the approved and proposed development and the estimated changes in traffic generation in terms of Annual Average Daily Traffic (AADT)*'.

3. A further PA application has been submitted to replace the tower structure as approved by PA6097/20, which introduce changes to the tower structure and an increase in project footprint (described further below): PA/04313/25: *Construction of a mixed use 40-storey tower (Triq Elija Zammit) making use of FAR policy for tall buildings. The proposal will include 4 basement levels comprising of car parking, storage, plant areas and water reservoirs. The tower will consist of the following mix of uses: Class 1 residential apartments, Class 3B hotel (hotel rooms and serviced apartments) including hotel amenities (pool areas, restaurants, event halls and rooftop bar), Class 4A offices, Class 4B Retail, Class 4C & 4D Food & Beverage and dedicated spaces for technical services at different levels of the tower. The proposal also includes an open piazza with hard and soft landscaping, a retail and F&B pavilion directly connected with basement levels, public seating, ventilation vents and tables and chairs associated with F&B units. This proposal further consolidates the site from the previously approved permits PA/02470/16 and PA/06097/20 and will increase further the site area to provide a comprehensive scheme.*

4. The following applications are related to the above, as part of the comprehensive scheme for the area:

- **The adjacent 'ECabs site'[1]:** PA/05346/25: *Excavation of existing site as an extension to the approved phase 1 (PA/02470/16) of an ensuing comprehensive project which includes the construction of underground parking and facilities and an overlying tower in accordance with FAR policy for tall buildings.*
- **Adjacent garage[2]**: PA/05350/25: *Excavation of existing site as an extension to the approved phase 1 (PA/02470/16) of an ensuing comprehensive project which includes the construction of underground parking and facilities and an overlying tower in accordance with FAR policy for tall buildings. (Location: 1 Garage, Triq Santu Wistin, San Giljan.)*
- **Adjacent dwelling (approved development permit):** PA/04263/20*: Demolition of existing dwellings, excavation and construction of underground parking on 5 levels, as Phase 1 of project.*

[1] Demolition of this site has been approved through PA/04805/25: *Demolition of existing property and provision of temporary boundary wall as an extension to the approved phase 1 (PA/02470/16).* Excavation here had previously been approved through PA122/21: To sanction change of use Class 4D to Class 4A, including internal and external alterations.

[2] Demolition of this site has been approved through PA/04806/25: *Demolition of existing garage and provision of temporary boundary wall as an extension to the approved phase 1 (PA/02470/16)*. Excavation here had previously been approved through PA 3894/18: *Demolition of garage, and construction of 12 roomed Class 3A guesthouse.*

5. This document consists of a review of the changes proposed in the development permits listed above, the change in significance of the environmental impacts caused, and the degree to which the project proponents have taken measures to mitigate against such impacts. This document is intended to provide the required information to the competent authorities to determine whether the findings of the original EIA process are still valid, or whether updates are required. This document is to be read in the context of the Environmental Impact Assessment carried out for PA 2470/16 and PA 6097/20, and the resulting ERA conclusions as documented in their reports dated January 2022.

6. The preparation of this statement has been prepared in an iterative manner, where findings from the assessment process have been used to inform the project development process and optimise design parameters where possible.

Project Description & Changes from Project approved through PA 6097/20

7. The development approved through PA 6097/20 consisted of the development of a tower including residential, hotel, commercial and office use, located in St. Julian's, on the north-eastern coast of Malta. The site is in the immediate proximity to Triq Mikiel Anton Vassalli, a four-lane road extending from San Gwann to Swieqi. It is in the immediate proximity of the following three roads running from the northernmost to the southern ends of the site:

    - **Triq Santu Wistin** which extend from the westernmost end of the site, leading north-north-easterly direction down to the beach at Ix-Xatt ta' San Gorg;
    - **Triq is-Swieqi** along the southernmost end of the site, extending westwards to the tunnel under Triq Mikiel Anton Vassalli, and northeast towards Triq Elia Zammit; and
    - **Triq Elia Zammit** which extends in a north-easterly direction to the centre of Paceville.

8. **Site context**: this remains unchanged, and include the following:

    - **transportation services**, with offices and public service garage across Triq Santu Wistin;
    - **tourism and recreation,** particularly the InterContinental Hotel immediately to the east of the site, and dispersed through the Paceville area;
    - **commercial outlets** ranging from the retail complexes such as Bay Street in Triq Santu Wistin, to the various food and beverage outlets; and
    - **offices** which are dispersed throughout the area, either as office complexes, or individual units.

    Residential uses are located further away, with the nearest residential areas being in Swieqi to the west, and across Triq Sant Andrija to the south.

9. **Change in project footprint**: as illustrated in image 1a, the site proposed for this development originally consisted of an irregularly shaped plot of land of approximately 3,500 square metres, occupied by various dilapidated residential units. The new proposal increases the project footprint by circa 615m^2 to 4,115 square metres, through the addition of adjacent space previously occupied by the eCabs premises, and additional underground space along Triq Elia Zammit (see images 1a & b for details).

Image 1a: PA/06097/20 application site boundary; adjacent plots (blue) have been acquired to increase the developable site area and improve the development potential (source: Project Landmark Design Statement, LOM architecture and design, April 2025)

Image 1b: Consolidated site boundary; the area in red will remain within the ownership of a third party above ground while below ground, will be part of the new development's basement. (source: Project Landmark Design Statement, LOM architecture and design, April 2025)

10. The consolidation of the areas around the site and a different design approach have introduced a number of changes to the project design. A detailed set of the final project plans are provided within Annex A of this document.

11. **Change in height:** the tower structure as approved by PA6097/20 consisted of a tower of 33 levels, with a further 6 levels underground, having a total height of just over 151m above mean sea level. The new proposal increases the number of floors to 40, resulting in an increase in height by just under 33m (from a parapet height of 151.12m to a parapet height of 178.0m, topped with an aesthetic crown to a total of +184m. This change is of relevance to the assessment of visual impact arising from this structure.

12. **Change in tower design/exterior**: the tower design being proposed is set towards the western end of a public piazza, together with a commercial pavilion. The tower has a triangular cross section with rounded edges, a design feature intended optimise use of the available developable area. The architectural detail includes a grid like wrap terminating in a crown, to create visual interest. The concrete grey finishing has now been replaced with a palette of different earth colours (grey/dark bronze and white tints) to accentuate the architectural detail. Greenery is incorporated along the southern elevation to form a 'green spine' or 'vertical oasis'. This change is of relevance to the assessment of visual impact arising from this structure.

13. **Change in Gross Floor Area**: the increase in project area allows for an increase in gross floor area and also to tower height; Table 1a and b allow a comparison between approved and proposed designs.

14. **Change of Use** remains similar in terms of the nature of use, with hotel and residential uses being located above the office and commercial levels below. However, the scale and proportions of such uses have been updated (see Tables 1a and b) to illustrate how areas dedicated to different uses have been changed. Separate access to the different uses will be from an independent entrance lobby at different active frontages within the piazza. These will be on different podium levels, taking advantage of the change in site topography.

15. **Area around the tower**: the area around the tower has been designed to be permeable to public access, and fully distinct from the surrounding developed areas. Staircases are used to bridge the difference in street levels (between Triq Santu Wistin and Triq Elia Zammit). Lifts provide an alternative means of access. The piazza is fully permeable to pedestrian traffic.

Table 1a: internal and external areas of the various uses for PA6097/20 (as provided by Perit Christian Spiteri).

	LEVELS	hotel room	1 bed	2 bed	3 bed	serviced apartments	area internal (sqm)	area external (sqm)
MEP	33							
	32							
	31							
SUBTOTAL								
DUPLEX	30						401.2	31.0
	29	0	0	0	2	2	484.8	148.5
SUBTOTAL								
SERVICED APARTMENTS	28	0	4	1	0	5	510.3	134.2
	27	0	4	1	0	5	517.6	135.3
	26	0	4	1	0	5	524.1	142.3
	25	0	6	0	0	6	539.8	137.4
	24	0	4	0	1	5	539.6	151.0
	23	0	6	0	0	6	565.1	137.6
	22	0	5	1	0	6	575.8	138.5
	21	0	6	0	0	6	583.4	143.5
	20	0	4	2	0	6	590.2	149.2
	19	0	6	0	0	6	601.5	150.8
SUBTOTAL		0	49	6	1	56		
HOTEL	18	6	0	0	0	0	617.1	147.5
	17	5	0	0	0	0	628.6	148.3
SUBTOTAL		11	0	0	0	0		
MEP	16							
	15							
	14							
SUBTOTAL								
RESTAURANT	13						413.7	
	12						893.4	181.9
SUBTOTAL								
OFFICE	11						907.1	
	10						920.9	
	9						934.7	
	8						948.7	
	7						962.8	
	6						977.0	
	5						991.3	
	4						1005.7	
	3						1020.3	
	2						1034.9	
	1						1049.6	
SUBTOTAL	sqm/No							
AUDITORIUM	0						317.0	
	sqm/No							
PLAZA GROUND	0						553.2	
TOTAL							20609.3	1895.2
TOTAL							22 504.5	

Table 1b: internal and external areas of the various uses for new proposal (source: Project Landmark Design Statement, LOM architecture and design, April 2025).

Height (m)					Total Area (sqm)						External terrace	
Floor	Floor height	Datum floor level (m)	Total height	Use	GEA	GIA	Deduct.	GFA	NIA	Net/ gross	Area (sqm)	% of GFA
39	3,740	174.260	157,080	Plant	546	546	546	0	0	0.0%		
38	3,740	170.520	153,340	Hotel - Pool terrace	567	545	88	479	194	35.6%	911	190.2%
37	3,740	166.780	149,600	Plant	534	947	534	0	0	0.0%		
36	3,740	163.040	145,860	Hotel - Restaurant	978	947	88	890	608	64.2%	711	79.9%
35	3,740	159.300	142,120	Resi - service apts	1,319	1,277	98	1,221	889	69.6%	311	25.5%
34	3,740	155.560	138,380	Resi - service apts	1,319	1,277	98	1,221	889	69.6%	311	25.5%
33	3,740	151.820	134,640	Resi - apartments type C	1,340	1,293	104	1,236	929	71.8%	316	25.6%
32	3,740	148.080	130,900	Resi - apartments type A	1,357	1,312	102	1,255	955	72.8%	330	26.3%
31	3,740	144.340	127,160	Resi - apartments type C	1,340	1,293	104	1,236	929	71.8%	316	25.6%
30	3,740	140.600	123,420	Resi - apartments type A	1,357	1,312	102	1,255	955	72.8%	330	26.3%
29	3,740	136.860	119,680	Resi - apartments type B	1,334	1,288	103	1,231	924	71.7%	331	26.9%
28	3,740	133.120	115,940	Resi - apartments type A	1,357	1,312	102	1,255	955	72.8%	330	26.3%
27	3,740	129.380	112,200	Resi - apartments type B	1,334	1,288	103	1,231	924	71.7%	331	26.9%
26	3,740	125.640	108,460	Resi - apartments type A	1,357	1,312	102	1,255	955	72.8%	330	26.3%
25	3,740	121.900	104,720	Resi - apartments type B	1,334	1,288	103	1,231	924	71.7%	331	26.9%
24	3,740	118.160	100,980	Resi - apartments type A	1,357	1,312	102	1,255	955	72.8%	330	26.3%
23	3,740	114.420	97,240	Plant	863	839	863	0	0	0.0%		
22	7,480	106.940	93,500	Resi - amenity + Terrace	867	839	86	781	622	74.1%	810	103.7%
21	3,740	103.200	86,020	Hotel - accommodation	1,140	1,109	207	933	466	42.0%	150	16.1%
20	3,740	99.460	82,280	Hotel - accommodation	1,379	1,340	529	850	466	34.8%	150	17.6%
19	3,740	95.720	78,540	Hotel - accommodation	1,380	1,342	111	1,269	875	65.2%	238	18.8%
18	3,740	91.980	74,800	Hotel - accommodation	1,380	1,342	111	1,269	869	64.8%	295	23.2%
17	3,740	88.240	71,060	Hotel - accommodation	1,380	1,342	111	1,269	875	65.2%	222	17.5%
16	3,740	84.500	67,320	Hotel - accommodation	1,380	1,342	111	1,269	869	64.8%	238	18.8%
15	3,740	80.760	63,580	Hotel - accommodation	1,380	1,342	111	1,269	875	65.2%	222	17.5%
14	3,740	77.020	59,840	Hotel - accommodation	1,380	1,342	111	1,269	869	64.8%	238	18.8%
13	3,740	73.280	56,100	Hotel - accommodation	1,238	1,200	110	1,128	739	61.6%	113	10.0%
12	3,740	69.540	52,360	Plant	624	610	624	0	0	0.0%		
11	3,740	65.800	48,620	Hotel - meeting + Terrace	884	854	89	795	538	63.0%	784	98.6%
10	3,740	62.060	44,880	Hotel - restaurant / plant	1,289	1,244	101	1,188	578	46.5%	208	17.5%
9	3,740	58.320	41,140	Office	1,401	1,354	847	554	233	17.2%	106	19.1%
8	3,740	54.580	37,400	Office	1,401	1,354	175	1,226	859	63.4%	106	8.6%
7	3,740	50.840	33,660	Office	1,401	1,354	175	1,226	859	63.4%	106	8.6%
6	3,740	47.100	29,920	Office	1,401	1,354	175	1,226	859	63.4%	106	8.6%
5	3,740	43.360	26,180	Office	1,401	1,354	175	1,226	859	63.4%	106	8.6%
4	3,740	39.620	22,440	Office	1,401	1,354	175	1,226	859	63.4%	106	8.6%
3	3,740	35.880	18,700	Office	1,401	1,354	175	1,226	859	63.4%	106	8.6%
2	3,740	32.140	14,960	Plant	511	511	511	0	0	0.0%		
1	3,740	28.400	11,220	Plant	1,413	1,403	1,413	0	0	0.0%		
M	3,740	24.660	7,480	FM / plant	656	636	656	0	0	0.0%		
UG	3,740	20.920	3,740	Podium	961	930	200	761	521	56.0%		
OG	3,910			Podium	1,503	1,404	1,090	413	370	26.4%		
LG	3,910			Podium	2,302	2,127	1,792	510	455	21.4%		
B01				Car parking	4,403	4,288	4,403	0	195			
B02				Car parking	4,403	4,288	4,403	0	195			
B03				Car parking	4,403	4,288	4,403	0	202			
B04				Car parking	4,403	4,288	4,403	0	202			
Totals				Grand total	70,059	68,277	30,925	39,134	28,153		9,929	
				Total above podium	47,681	46,664	10,231	38,211	27,359			
				Total height				157,080				
				Datum height				178.00				

16. **A retail pavilion** (three floors) is proposed in the piazza, framing pedestrian routes through the site, and providing also roof and terrace external spaces.

17. **Landscaping:** hard surfacing is necessary in those areas where pedestrian traffic is expected to be of significant volume. The proposed tower structure increases the emphasis on soft landscaping, with increased tree planting at street level, and the adoption of the 'green spine' concept. Soft landscaping, including various planters and three water features, is provided along the pedestrian area in the piazza and along pedestrian footpaths along the street. Efforts are being made to incorporate native species in the planting design, and avoid invasive species.

18. **Podium Ground Level** is located on the ground floor and provides access to the lobby leading up to the residential areas. This area is interconnected with the commercial levels on the lower level via a wide staircase; the lower level is permeable to foot traffic from the entrance along Triq Santu Wistin. It also includes:

    - service facilities on the podium ground levels (storage, logistics)
    - dedicated waste areas, including compactors for packaging waste
    - 4 emergency generators with an associated tank room

19. **Podium (Lower Ground)** is accessible from Triq Santu Wistin and interconnected with the other levels as described above; access to the hotel lobby and the commercial levels is from this level either directly or via lifts and staircases. It also includes:

    - Hotel service facilities on the podium ground levels (back of house facilities)
    - transformer, Uninterruptible Power Supply (UPS)

20. **Podium (Upper Ground)** is interconnected with the other levels as described above; access to the piazza and the commercial pavilion is from this level either directly or via lifts and staircases.

21. **Above ground levels** are organised as follows:

    - segregated lobbies in the podium providing access to different uses on the upper levels;
    - offices on Levels 3-9 inclusive, each with a landscaped external terrace;
    - MEP facilities on Levels 1, 2, 12 and 23;
    - a restaurant on levels 36 and 37;
    - a maximum of 68 serviced residence apartments on levels 24 to 34 inclusive;
    - a 5 star hotel with 188 rooms on levels 10 to 22 inclusive; and
    - rooftop amenity including pool and terrace.

22. **Underground levels**: the main use of the basement levels is for parking and service areas. The four underground basement levels are accessed through lifts and emergency stairwells for pedestrian traffic, and a circular two-way access ramp for vehicles. The basement levels include:

- Fan rooms for ventilation and smoke extract system
- Attenuation / rainwater storage tanks
- Sprinkler tanks and pumps

23. **Fire management**: a Fire Report Strategy has been developed by G DeGiovanni (AP Services) to direct project development, to ensure that the safety aspects related to fire are given due consideration in terms of design and choice of materials. In summary, the fire strategy considers the building uses and the applicable standards[3], and considers the following points:

- access for fire fighting services should they be necessary;
- access routes for evacuation and firefighting personnel;
- fire resistance of the structures and structural integrity, fire compartments, and protection of the communications provision within the building;
- fire rating and insulating properties of materials to limit propagation of fires;
- protection and evacuation measures;
- smoke management;
- firefighting systems, including on-site reservoirs, hydrants, sprinklers and hoses; and
- management measures required for provision of emergency responses.

24. **Building design standards**: the choice of a tower construction technology encourages the uptake of more environmentally friendly technologies consistent with the intention to obtain LEED Gold standard certification for the building.

[3] BS 9999: *Fire safety in the design, management and use of buildings* – Code of practice applicable to all types of building except those for residential use for all people in and around buildings
BS 9991*: Fire safety in the design, management and use of residential buildings* – Code of practice applicable only to residential buildings.

25. **Services on site**: connections will be established for water, foul water sewers, data and energy. Space has been reserved in the building to house the necessary infrastructure. Engineering design is aiming towards certification in terms of Leadership in Energy and Environmental Design (LEED) – Gold certification level. These will be connected to public infrastructure as follows

    - a substation will be constructed as per Enemalta specifications; and
    - Wastewater will connect to the municipal sewage network through the existing sewer gallery to the south of the site on Triq Gort; where areas of the site lie below the required minimum levels to allow gravity drainage, these may need to be diverted to the smaller existing sewer to the northwest of the site on Triq Santi Wistin.

26. **Four generators** will be required for provision of power during emergency situations, including emergency lighting during power outages. A storage of fuel of is also being proposed, to be stored in appropriate bunding. Given that these generators exceed the $1MW_{thermal}$ rating, these will fall within scope of the Medium Combustion Plant Regulations[4].

27. **Storm and surface waters:** waters generated on site will be collected in a reservoir of circa 1,500m3 (PA6097/20 had a reservoir volume of $650m^3$). This water will be used as second-class water for flushing, washing, irrigation and cleaning, but such use will be limited by the use of level switches to ensure that the site will always have the minimum required water for fire suppression. Overflow from the reservoir will be into Triq Santu Wistin.

28. **Access, transportation and related infrastructure:** Access to underground parking facilities is being provided through an entrance/exit point along Triq Santu Wistin. This access point (Day 1) will be the access point utilised until the new junction designed by Infrastructure Malta is implemented. The new junction is intended to improve traffic flow on the Regional Road and will introduce a grade-separated junction to replace the existing traffic lights, as well as reorganise traffic lanes to improve vehicular accessibility to and from Swieqi and St Julian's. A second vehicular entry point (Day 2) will be provided from the south on completion of the new junction. Further detailed coordination will be undertaken on the design and coordination of this with Infrastructure Malta.

[4] The Limitation of Emissions of Certain Pollutants into the Air from Medium Combustion Plants Regulations (SL 549.122)

29. This project is more than self-sufficient with respect to parking requirements with 366 parking spaces (up from 268 parking spaces), and provides 197 cycle parking spaces.

30. Considerations related to traffic management have been evaluated extensively in a Traffic Impact Assessment and addendum prepared by Mr. Bjorn Bonello, and attached as Annex ease of reference

31. **Seismic performance**: the structural design of the building conforms to the relevant Eurocodes (EN 1990 to EN 1998), with relevant basic parameters defined to UK National Annex information, except for wind and seismic loading criteria that are defined based on local regulations and best practice.

Project justification, Demand for, and Objective of, the Project

32. The project proponents draw upon extensive in-house expertise in the development and letting of high-end office, commercial, hospitality, and residential properties. The proposal seeks to maximise the potential of a site located at the primary entrance to Paceville, currently under-utilised relative to its strategic position, and to establish a benchmark for integrated urban redevelopment. This will fulfil the project objective, which is to deliver a multi-use landmark development that reflects the economic aspirations of the St Julians/Paceville area.

33. The project will consolidate a 5-star, 188-room lifestyle hotel, premium-grade office facilities totalling approximately 5,300 m², and a maximum of 68 serviced residential units within a single vertically integrated tower. The design includes a publicly accessible plaza encircling the building, creating a new pedestrian link between Triq Elia Zammit and Triq Santu Wistin, significantly improving connectivity both with the proposed traffic junction upgrades, and also by dispersing foot traffic more evenly across the locality. This intervention is anticipated to revitalise an area presently characterised as a pass-through zone and stimulate broader commercial activity in its surroundings.

34. In alignment with Malta's Vision 2050 (April 2025), the project directly supports national objectives for sustainable economic growth and premium-oriented development of the tourism sector. The proposed hotel targets higher-spending visitors through lifestyle offerings such as rooftop pool, spa, and signature dining. These facilities are intended to attract discerning travellers and business guests seeking differentiated, centrally located accommodation, complementing rather than competing with resort-style coastal properties elsewhere on the island. The project also supports Vision 2050's emphasis on vertical expansion in strategic zones, reducing land take while improving liveability through public open space.

35. The premium residential units, serviced by the hotel, will cater to the growing segment of high-value expatriates and local professionals seeking quality accommodation integrated with hospitality services. Nearby high-end developments in St George's Bay, have demonstrated rapid absorption of comparable units, indicating strong market appetite. The office component is specifically designed for boutique tenants and executive suites, distinct from back-office operations facing oversupply elsewhere, thereby strengthening its viability and complementing the area's positioning as a hub for high-value service industries.

Review of Coordinated Assessment findings

36. The Environmental Impact Assessment for PA 2470/16 and PA 6097/20 considered the nature of the project, together with an outline of the available information on the activities that will be involved in site preparation and construction. This allowed identification of the likely significant risks posed by the project on the environment during excavation, construction and operation.

37. The potential environmental aspects that were identified as being relevant to these risks are summarised as follows (not in order of significance):

- land use;
- biodiversity;
- geology and hydrology;
- amenity, in terms of traffic and parking;
- air quality;
- noise and vibrations;
- waste generation and management;
- landscape and visual amenity;
- microclimate and shading;
- light levels;
- fire; and
- consumption of water and energy.

38. The new tower as proposed by development permit PA4313/25 (and associated development permits as listed previously) do not involve additional environmental aspects or risks. The extent to which individual environmental aspects are affected (or otherwise), is documented in the following sections.

39. The EIA process carried out for PA 2470/16 and PA 6097/20 evaluated the environmental impacts affecting the various environmental aspects. To recapitulate, the following criteria had been applied during this exercise:

i. **Impact Type and Source** have been derived through consideration of the project proposal, revised iteratively in response to added mitigation measures that were found to be appropriate;

ii. **Impact Receptors** have been derived from consideration of the extent of influence of the project proposal on the various environmental media (air, water and ground) caused by potential pollution (of chemical pollutants, noise and light); Receptors are designated as:

- sensitive (or conversely low sensitivity); or
- resilient or able to withstand environmental impacts (or conversely vulnerable).

iii. **Effect and scale** of the resultant impacts have been determined in terms of:

- whether impacts are direct or indirect, and/or cumulative;
- beneficial or adverse;
- severity after considering the effect of applied mitigation or scale of the impact;
- whether impacts result over the short, medium or long term;
- the duration of the impact; and
- extent of reversibility.

iv. **Probability of Impact** occurring (classified as Inevitable, Likely, Unlikely, Remote, Uncertain), including an assessment of whether such probability is dependent on an environmental management measure;

v. **Overall Impact Significance** (classified as High, Moderate, Low or Negligible)[5]

vi. **Residual Impact Significance** (classified as High, Moderate, Low or Negligible)

[5] Impacts with a 'high' significance are likely to be highly disruptive to the receptor; 'moderate significance' will result in a clear change to baseline conditions; 'low significance' will result in a change that is detectable but marginal. 'Negligible' is a change not likely to be detectable through monitoring.

40. The following sections review the various environmental aspects, and highlights the changes (where applicable) arising from the new project proposal PA4313/25. These include changes to:

- the baseline environmental conditions;
- The envisaged potential environmental risks, selected mitigation and resultant impacts;
- The magnitude, severity and significance of the impacts, including the likely significant impacts and the likely residual impacts, and indirect secondary impacts;
- The geographical extent/range and physical distribution of the impacts in relation to: site coverage and the features located in the site surroundings;
- The timing and duration of the environmental impacts (whether the impact is temporary or permanent; short-, medium- or long-term; and reasonable quantification of timeframes);
- Whether the impacts are reversible or irreversible (including the degree of reversibility in practice and a clear identification of any conditions, assumptions and pre-requisites for reversibility);
- Whether the impacts are adverse, neutral or beneficial;
- The sensitivity and resilience of resources, environmental features and receptors vis-à-vis the impacts;
- Implications and conflicts vis-à-vis environmentally-relevant plans, policies and regulations; and
- The probability of the impacts occurring; and
- the proposed mitigation measures.

41. Table 2 included with the section titled ‘Conclusions’ includes a summary of the impacts affecting the various environmental aspects, the considers the impact receptors affected, and the effect and scale of the final resultant impact. Findings arising from PA4313/25 which differ from those documented as part of the EIA process for PA6097/20 are indicated in red text.

A. Land Use & Public Access

42. **Baseline conditions:** development permit PA6097/20 approved on site allows the development of a tower structure.

43. The **environmental risk** pertaining to this aspect is that of inefficient or improper use of land. The land use review carried out for the tower as currently approved concluded that:

- *'the surrounding land uses within the area are generally mixed, with hospitality, transport and offices located in the immediate proximity, and with entertainment and residential uses being located further away;*
- *various land use policies are specifically applicable to the site of the project, and the proposed uses are consistent with the uses considered in the policy;*
- *various policy objectives relative to improving site permeability to pedestrian traffic are facilitated by the project; and*
- *the nature of the project is consistent with the provisions of the FAR policy regulating tall buildings.'*

44. **Significant impacts:** given that the project aims to make efficient use of the site while increasing the extent of accessible public spaces that promote pedestrian traffic, an overall beneficial impact was envisaged in terms of efficient land use in the original studies. No likely residual impacts or indirect secondary impacts were envisaged. The consolidation of adjacent land parcels reinforces this finding.

45. **Public Access:** public access is enabled through this project, where significant areas are accessible to the public, rendering the site permeable to pedestrian traffic as a resultant impact, particularly between Triq Santu Wistin and Triq Elia Zammit. As with the original study, an overall beneficial impact is consequently envisaged, and no residual impacts are expected.

46. **Mitigation:** this is here construed as the project design, which aims to make efficient use of the site while increasing the extent of accessible public spaces that promote pedestrian traffic

B. Biodiversity

47. As detailed within the EIA study for PA 6097/20, the location of the project is not of significance with respect to presence of biodiversity, as the site is distant from the nearest protected area (Wied Harq Hammiem), which is not within the area of influence of the proposed project.

48. **Significant impacts arising from PA6097/20**: the consequence of the proposal will involve:

- **obliteration of alien species on site** - a beneficial impact, given that these consist of alien species having invasive properties which are capable of damaging local biodiversity if disseminated; and
- **no effect on natural areas in the vicinity**: direct impacts are outside the sphere of influence of the project, and any cumulative effects resulting from the project (i.e. impacts cumulating with those from surroundings existing developments) would contribute to impacts on biodiversity generally. No direct impact is consequently envisaged, and no residual impacts or indirect secondary impacts are expected.

49. **Significant impacts arising from the new proposal**: the consequence of the proposal will involve increased landscaping cover, with efforts being made to use native species where viable. This is considered a beneficial impact.

C. Geology and Hydrology

50. The EIA for PA6097/20 included a report titled '*Geo-environmental Baseline Survey and Report: Development at a Site Facing Triq Santu Wistin and Triq Elia Zammit in Paceville'* prepared by Dr. Saviour Scerri. The report observed that the site is located on the eastern slope of an unnamed valley, with a watercourse that is now occupied by Triq Santu Wistin. Field geological observations indicated that the site is extensively modified by development, and none of the original surface features are preserved. The site is dominated by the following rock strata: Lower Coralline Limestone Formation, and the Lower Globigerina Limestone Mb of the Globigerina Limestone Formation. The hydrogeological feature closest to the site was noted to be the mean sea level aquifer, which lies some 20m below ground level.

51. **Impact on geological features or underground water bodies**: excavation, as permitted by PA 2470/16 has already commenced. The changes introduced by PA4313/25 (and associated development permits) are limited to a site area of circa 600 square metres, where a degree of excavation is already permitted through existing commitments on site. In this regard, the conclusions of the original studies remain unchanged. Given that there are no particular geological features on site that require protection, and given that the site is not within any specific aquifers, no direct impact is consequently envisaged, and no residual or indirect secondary impacts are expected. Mitigation required here is adherence to recommendations arising from managing vibrations (see following sections).

52. **Surface water runoff**: the studies carried out for PA6097/20 highlighted that Triq Santu Wistin forms part of a valley system with a watercourse, that discharges into Il-Bajja ta' San Gorg, and included an evaluation of the path of terrestrial runoff in the locality. While PA4313/25 includes an increase of surface area catchment of circa 600 square metres, the size of the reservoir has been increased to circa 1,500m3 (PA6097/20 had a reservoir volume of 650m3). Consequently, the effect of PA4313/25 is not considered to be different from that of PA6097/20.

53. **Water Quality**: as with PA6097/20, the environmental risks posed to water quality by PA 4313/25 are expected to arise from the following sources:

- **transport of dust by stormwaters** during the excavation and construction phases**;** and
- **the discharge of stormwaters to the surrounding roads** principally Triq Santu Wistin, and eventually to the sea.

It is expected that this issue be addressed through the Construction Management Plan, which would include measures to contain such dusts on site, and prevent overspill of stormwaters into Triq Santu Wistin. Given proper application of this mitigation measure, no direct impact is consequently envisaged, and no indirect or residual impacts are expected.

54. **Land**: as with PA6097/20, the risk to this environmental aspect posed by PA4313/25 is present through all stages of the project through spillage of polluting liquids, i.e. either from vehicles leaking oil, or spillages of fuel. The resulting impact would cause land contamination, with the potential that such pollutants might affect water bodies. The required mitigation would involve:

- bunding of the fuel store of the generator to 110% of the fuel volume, so as to ensure containment in event of leakage or catastrophic rupture;
- proper maintenance of vehicles to minimise the probability of such a spill; and
- the presence of spill kits on site for clean-up operations.

Given proper application of the above mitigation measures, no direct impact is consequently envisaged, and no indirect or residual impacts are expected.

D.Amenity: Traffic and Parking

55. PA 2470/16 and PA 6097/20 were evaluated through a Traffic Impact Assessment (TIA) prepared by Mr. Bjorn Bonello, which evaluated the phased development of the project. PA4313/25 promote an update to the TIA findings, titled *Technical Memorandum: Traffic Impact Assessment – Methodology, Assumptions, and Responses to Review Concerns*[6] and dated September 2025. This is attached as Annex B.

56. The update to the TIA findings reviewed PA 4313/25 in terms of trip generation, and concluded that the project would contribute a '*new primary AADT: ~760–915 veh/day, central value ≈ 830 veh/day*'. The update compares this with the scenario calculated previously for PA6097/20, and states that '*this sits squarely within the previously indicated 750–890 range and is anchored in the TIA's trip-rate sources, conservative modal splits, and per-land-use linked/non-primary treatment*.' This is to be considered against a baseline AADT of 16,700 veh/day in Triq Santu Wistin.

57. The general context of the project as approved by PA 6097/20 was described as follows: '*The development is within an area that has experienced a considerable increase in traffic due to construction of high density commercial development. The site is bound by the two main routes into Paceville from Triq Mikiel Anton Vassalli through a junction earmarked for improvement, which is identified in the North Harbours Local Plan (1996) Map PV1*.' The situation has now improved, in that the junction proposed by Infrastructure Malta removed the need to use Triq Santu Wistin as an access point, allowing direct access from the junction (see section on project description for details). This is considered to be a beneficial impact, as it reduces traffic volume from Triq Santu Wistin.

58. This is consistent with the observation within the TIA that '*the main issue is the access and exit off Triq Mikiel Anton Vassalli outside of Paceville. Traffic flows are very high here, hence traffic is restricted from getting in or out of Paceville. Traffic flows inside Paceville are not very high (although exacerbated by vehicles cruising for on street parking spaces) but are unable to enter or exit Paceville due to the high flows on Triq Mikiel Anton Vassalli. The improvements through IM's currently suspended development application, PA 6089/19, seeks to address these issues'*.

[6] Project: PA4313/25 – Construction of a Mixed Use 40-Storey Tower (Triq Elija Zammit) Making Use of FAR Policy for Tall Buildings (Following the findings already approved in PA/02470/16 and PA/06097/20)

59. The final project design of PA6097/20 provided 268 parking spaces to satisfy a parking demand of 220 parking spaces. The development proposed by PA 4313/25 provides a total of 366 parking spaces, to satisfy the demand of 333 car parking spaces required for the commercial, office, hotel and residential uses combined.

60. **Mitigation measures**: the mitigation measures proposed for PA6097/20 still hold for PA4313/25, and would serve to counteract the impact caused through the increased traffic in the area:

- Adoption of a green transport plan;
- Encouraging pedestrianisation through improvement of the street environment and urban fabric and the public realm in the area;
- a safer pedestrian link connecting Triq Santu Wistin with Triq E. Zammit, facilitating access to public transport stops along Triq Gort/Triq Sant Andrija;
- Cycle racks, and end of journey facilities such as changing rooms and shower facilities for employees; and
- Promotion of pedestrian links and routes to the neighbouring areas.

E. Air Quality

61. **Emissions to Air**: review of the project parameters highlights that the potential risk to air quality is posed by the potential for emissions from the following sources:

- **traffic generated by the project;**
- **dust generation** during the excavation and construction phases; and
- **the use of an emergency generator.**

62. During the EIA process for PA6097/20, air quality was studied in a report prepared by Dr. George Peplow titled '*Air Emissions Impact Study: Report on the Air Quality Study and Projected Impacts of the proposed PX Tower, San Giljan*.' This report concludes that:

'*The projected PX Tower development at San Giljan shall invariably increase the annual average daily traffic (AADT) and consequently the NO_2 and PM_{10} combustion exhaust emission values. However, in view of the increasing stringent vehicular emission limits imposed on car manufacturers through the EURO standards, the particulate matter (PM_{10}) and nitrogen oxide (NO_2) levels due to fossil fuel combustion exhaust are expected to diminish drastically for 2023, the year of commission, and by a much substantial reduction by 2028, five years following commissioning.*
PM_{10} values are the summation of exhaust vehicular emissions as well as non-exhaust wear particulate matter from tyre and brakes abrasions as well as road dust redeposition. Therefore, the non-exhaust fractions contributing to PM10 values shall continue to increase commensurate with AADT increases.'

63. The above air quality study was developed in parallel with the Traffic Impact Assessment, and considered the annual average daily traffic (AADT) flowing along through Triq Santu Wistin, Sqaq Lourdes, Triq il-Mediterran, Triq Gort, Triq Elia Zammit, Triq M Mangion, and the Pender Roundabout. Given the conclusions of the traffic update presented in the previous section, i.e. that the AADT for both projects are comparable, the conclusions on air quality for PA6097/20 can be adopted for PA4313/25.

64. To recapitulate, impact significance for PA4313/25 remains identical to that for PA6097/20: negligible for NOx values; the PM10 significance is moderate on project commissioning, dropping to slight after 5 years of operation (see table 3 below).

	NO_2		PM_{10}		PM_{10} PCT	
	2023	**2028**	**2023**	**2028**	**2023**	**2028**
Residences west of project	negligible	negligible	negligible	negligible	negligible	negligible
Residences south of project	negligible	negligible	negligible	negligible	negligible	negligible
School to the north of project	negligible	negligible	negligible	negligible	negligible	negligible
School to the east of project	negligible	negligible	negligible	negligible	moderate	slight

Table 3: impact significance for NOx and PM10, at the location of the sensitive receptors

65. Mitigation of emissions from traffic are ultimately dependent on traffic management. Such measures are considered in the Traffic Impact Assessment included in Appendix 12, which considers the existing scenario, the predicted developments expected on site in terms of upgrades to traffic junctions, and the contribution of the proposed development to traffic on site. Mitigation proposed in the previous section on *Amenity: Traffic and Parking* also apply here.

F. Noise and Vibrations

66. The sources of noise emanating from this project that pose an environmental risk are mainly limited to the construction phase, given that the residential and office functions do not pose significant sources of noise in themselves, and would eventually themselves constitute sensitive receptors. Noise and vibrations were evaluated during the EIA process for PA6097/20 in a report titled '*Multi use development, PACEVILLE TOWER: Noise & Vibration Impact Assessment'* (2021) prepared by Dr. George Peplow and Perit Ruben Sciortino.

67. The proposal for PA4313/25 does not change the nature of the excavation or the construction process. Furthermore, the surrounding context of the process remains unchanged from that observed in the report: '*the proposed tower is located partly within the Residential Buffer Zones with Entertainment Uses and partly within the Secondary Town Centre in accordance with NHPV 12 and NHRE01 of the North Harbours Local Plan, approved in July 2006*.' A site review concluded that '*in this instance, the principal receptors will be:*

    - *Residential/hotel uses located on the opposite side of the road or adjacent to the proposed development on Triq Santu Wistin.*
    - *Residential properties adjacent to the proposed development and a language schools located on the opposite side of the road on Triq Elia Zammit* '.

68. Given that the sensitive receptors and sources remain unchanged, the conclusions of the study on PA6097/20 can be adopted for PA4313/25. This assessment had listed the impacts arising from the excavation and construction processes, in terms of both noise and vibration arising from the works involved. **T**he report considered the various construction plant and traffic levels associated with the works carried out on site, using the following guidance on prediction and assessment of noise from construction: *BS 5228: 2009 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*. The assessment considered the worst-case noise levels that might occur during a typical working day, in the situation where it was assumed (as a worst-case scenario) that the construction activities were occurring at the closest point on the site to the closest noise sensitive receptors.

69. The assessment indicates that '*at their closest proximity to noise sensitive receptors, elements of the on-site construction work have the potential to give rise to elevated noise levels that will be clearly audible off-site and in excess of the limit values suggested in Table E.1 of BS 5228-1. It is worth noting that this assessment does represent the very worst case and not the situation for the majority of the construction operations; as construction activities become more widely distributed across the construction site and as they move further away from the receptors, noise levels will reduce. However, it is evident that noise control measures will be required with respect to on-site construction activities*.'

70. The report also assessed off-site noise associated with the movements of additional construction-related vehicles on the surrounding road network, which is limited to agreed construction-traffic access routes as outlined in the Traffic Impact Study. The numbers of construction-related vehicles using the road networks during the working day; for the purposes of this assessment the 'worst case' situation of an additional 15 HGVs per day was applied to each of the three principal access roads to and from the various site areas, using baseline traffic count data provided by the Transport Consultant. These two sets of data were used to assess potential increases in noise associated with additional construction traffic, on the roads during the normal working day from 07:00 to 19:00 and using the correction factor for percentage of HGVs provided in Chart 4 of the Department of Transport memorandum *Calculation of Road Traffic Noise*. The assessment presented in the table below indicates that '*principally due to the existing high volumes of traffic on the two principal roads assessed, no adverse noise impact was predicted due to off-site movement of construction-related HGVs*.'

71. **Assessment of vibration**: the report considered the various construction plant and traffic levels associated with the works carried out on site, using the following guidance documents: BS 5228: 2009 *Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration*, BS ISO 4866: 2010 *Mechanical vibration and shock. Vibration of fixed structures. Guidelines for the measurement of vibrations and evaluation of their effects on structures (replaced BS 7385-1)*, BS 7385: 1993 *Evaluation and measurement for vibration in buildings — Part 2: Guide to damage levels from ground borne vibration* and BS 6472: 2008 *Guide to evaluation of human exposure to vibration in buildings – Part 1: Vibration sources other than blasting*. This assessment also considered the findings of the 2019 geotechnical report, describing how the underlying bedrock, a coralline limestone, would transmit vibration depending on the potential variability of the rock density, and the inclusion of water within the rock pores.

72. The assessment report concluded that '*the nature of the majority of the construction operations involve operations which would generate only relatively localised ground-borne vibration; significant off-site perceptible vibration would generally only be expected with high energy activities such as piling etc, and these are not proposed as part of the construction of this development. Thus it was considered very unlikely that perceptible off-site ground-borne vibration would occur. If it does occur, levels will be exceedingly low and only if occurring regularly in residential environments would there be a likelihood of complaint.*

However, there is a potential for perceptible vibration to be experienced only when the works approach the boundary of the site; the effects would be related to disturbance and annoyance with no adverse health effects. There will be no night time operations so disturbance of sleep for residents and hotel residents will not be an issue. It is not possible to quantify vibration levels at this time but it will be necessary to provide a very close operational 'watching brief' on this phase of works and specific monitoring and vibration controls measures might be required.

Overall, therefore, the assessment predicted that there was unlikely to be any adverse ground-borne vibration impact. However, in the interests of providing certainty to ERA and the local community, a number of standard best practice control measures will be recommended.'

73. **Assessment of traffic noise during operations:** the Highways Agency guidance document *Design Manual for Roads and Bridges*, Volume 11, Section 3, Part 7 (DMRB) indicates that increases in traffic of 25% are required in order to generate an increase in traffic noise of 1 dB; this level of change might be audible if the change in traffic is sudden. For longer-term or gradual changes, a 3 dB change in traffic would be deemed to be audibly significant and this would require a doubling of traffic (100% increase). The report concluded that '*in discussion with the transport consultant, it was confirmed that the maximum traffic increase will be of approx.12% (Triq il Mediterran) As this increase is less than 25%, it is envisaged that the increase in traffic will not have any effect on the current traffic noise'*.

G.Waste Generation and Management

74. The development as detailed within PA4313/25 and PA6097/20 are comparable from the waste management perspective, where the most relevant changes are:

- The increase in footprint, and consequently an increase in the volume of material to be excavated;
- The increased scale of the project, with the consequent increase in waste generation from the uses on site; and
- The more detailed provision of waste management facilities in the latest application, where segregated facilities are provided for the different waste streams, and compactors provided to compact packaging wastes.

75. It is pertinent to note that the LEED certification process for this project has reviewed the waste management considerations associated with this project, and has established targets to reduce waste generation during the construction phase wherever possible.

76. The significant impacts arising from PA6097/20 were detailed as follows:

- The generation of inert waste from the construction and demolition processes which are expected to be mitigated through recycling of materials generated wherever possible;
- Wastes generated through the construction and finishing processes; and
- Wastes generated through operations

Residual and indirect secondary impacts are limited to those impacts resulting on waste management infrastructure on a national scale.

77. The excavation required by the new proposal would result in an increase in excavation volume of circa 7,500-8,000 cubic metres[7]. This increase in volume would not be of a magnitude that would affect the evaluation of significance of the impact as indicated previously.

[7] It should be noted that circa 50,500cu.m have been approved in the original project (PA2470/16); over volumes that have been approved by the following development permit applications (see p5 for details):

- PA122/21: circa 1,400cu.m
- PA3894/18: circa 300cu.m
- PA4236/20: circa 5,100cu.m

H.Landscape and Visual Amenity

78. A method statement for the scientific visualisation of the tower as approved for PA6097/20 was prepared by Perit Joseph Pace of Visual Studios, and was approved by the Environment and Resources Authority. The assessment of impacts on landscape and visual amenity followed the *Guidelines for Landscape and Visual Impact Assessment* (2013) as prepared by the Institute of Environmental Management & Assessment (IEMA) and the Landscape Institute.

79. Given that PA 4313/25 involves an increase height of the tower and change in elevations, a change in impact magnitude and significance is a distinct possibility. In this regard, further study of this environmental aspect is recommended.

I. Shading

80. **Shading:** the presence of the proposed tower is expected to cast shade on the areas surrounding the projects. PA6097/20 had involved the scientific visualisation of the solar path, which was prepared by Perit Joseph Pace of Visual Studios, and was approved by the Environment and Resources Authority.

81. **Change from the previous proposal**: a change in shading is expected by the proposed amendment to the approved tower, mainly due to the increased height of the tower. In this regard, further study of this environmental aspect is recommended.

J. Microclimate

83. **Microclimate**: the environmental risk involving microclimate arise from the interaction between the built structure and the wind, potentially disturbing the local microclimate in the areas surrounding the proposed tower. The development of a wind study was a recommendation of the previous EIA process. In this regard, further study of this environmental aspect is recommended.

K. Light

84. The environmental risk posed by light pollution is expected to arise once the tower is completed and the lighting design is implemented. This has the potential contribution of this project to the sky glow noticeable in this area, as well as the potential for localised glare. In this regard, PA4313/25 will follow the draft *Guidelines for the Reduction of Light Pollution in the Maltese Islands* (June 2020), and the Planning Authority *Development Control Design Policy, Guidance and Standards 2015* (DC 2015) which includes the following recommendations as mitigation of such impacts:

'a) lighting should be strictly limited to within the developed part of the site and should direct light only where the light is required and only when the light is needed;
b) the development should not be considered as a justification for the lighting of the access roads, tracks and paths leading to the site or other lighting beyond the site boundary;
c) the lighting should be from any peripheral landscaping inward, so as to be screened as much as possible by the landscaping itself; and
d) with the exception of architectural lighting on historic structures, all exterior lighting installed on site should be of the downward-pointing, full cut-off type which when installed at the specified design attitude gives zero intensity at and above the horizontal. No luminaire globes or up-lighters would be accepted.'

85. The resultant impact is expected to be contribution to skyglow from the lights in the built structures, which is expected to result in a cumulative impact. This would be mitigated through adoption of the lighting standards described above. No further secondary impacts or residual impacts are expected.

L. Fire and safety

86. A new fire safety concept has been developed by A.P. Services to direct project development, to ensure that the safety aspects related to fire are given due consideration in terms of design and choice of materials. In summary, the fire strategy considers the building uses and the applicable standards[8], and considers the following points:

- Design and layout of the project, structural integrity, and fire compartments;
- A study of fire risks and hazards;
- access for fight fighting services should they be necessary;
- access routes for evacuation and firefighting personnel;
- fire rating and measures to limit propagation of fires;
- smoke management;
- firefighting systems, including on-site reservoirs, hydrants, sprinklers and hoses; and
- management measures required for provision of emergency responses.

[8] The fire concept strategy follows the following standards, and refers to various others:
BS 9999:2017 Incorporating Corrigendum No. 1 - Code of practice for fire safety in the design, management and use of buildings,
BS 9991:2024 Incorporating Corrigendum No. 1 - Fire safety in the design, management, and use of residential buildings - Code of practice
BS 7974:2019, Application of fire safety engineering principles to the design of buildings.
Approved Document K - Protection from falling, collision and impact

M. Consumption of Water and Electricity, Utilities

87. Consumption of water and energy, and the demand for use of utilities was elicited through discussion with project engineers. The performance of different factors is quoted below.

88. **Energy demand**: the assessment of demand for PA6097/20 indicated a maximum energy demand of 2,681kW; the updated design as proposed by PA4313/25 considers a maximum energy demand of 4,083kW, which is considered to be a result of the increased scale of the project.

89. **Water usage**: the assessment of demand for PA6097/20 indicated a maximum water demand of circa 10,400cu.m annually. The updated design as proposed by PA4313/25 considers a maximum water demand of circa 60,000cu.m per year. This increase is the result of the increased scale of the project.

90. **Drainage**: PA6097/20 envisaged a discharge of circa 20,000 cubic metres annually. The updated design as proposed by PA4313/25 considers a discharge of circa 54,000cu.m per year. This increase is the result of the increased scale of the project.

N.Sustainability Review

91. The development of PA 4313/25 has incorporated sustainability concerns by adopting the objective of obtaining LEED Gold certification[9] for the construction and development of the building. This process involves the systematic review of the process of construction and operation, the materials utilised in these processes, and the evaluation of the environmental footprint that results. The information within this section was collected through discussions with project LEED consultants *chapmanbdsp*, currently guiding the project through the LEED certification process.

92. **Sustainability performance**: the following key design and performance measures were incorporated into the development to enhance building efficiency, occupant comfort, and environmental performance, forming the foundation of the project's sustainability strategy:

A. **Passive Design and Building Performance**, including:

- Facade and architectural wraps designed for solar shading without obstructing views.
- Perimeter balconies reduce overheating by shading glazed areas.
- Glazing ratios limited to <50% per LEED best practice to minimize cooling loads.
- Thermal energy recovery systems (heat exchangers) enhance heating and cooling efficiency.
- Improved U-values and g-values for external elements to reduce heat gains and losses.
- Mechanical ventilation with heat recovery (MVHR) and lighting controls (occupancy sensors, daylight dimming).
- Solar thermal system preheats hotel domestic hot water.
- All-electric, energy-efficient supply with advanced metering and limited renewable PV generation.
- Integration of energy and water systems for optimal resource use.
- **20.4% end-use energy reduction** vs. ASHRAE 90.1-2010 Appendix G baseline.

[9] LEED (Leadership in Energy and Environmental Design) v4.1 BD+C: Core & Shell. This U.S. Green Building Council's LEED rating system applies to new construction or major renovations of buildings where the developer is responsible for the core building systems—like HVAC, electrical, plumbing, and fire protection—but not the tenant fit-out (interior finishes, furnishings, etc.).

B. Water Efficiency and Resource Management:

- Rainwater harvesting (≈1,500 m³) reused for WC flushing in hotel and office, irrigation, and washdown.
- Drip irrigation and native, drought-tolerant species reduce outdoor demand.
- Integrated energy-water management maximizes resource efficiency.

C. On site biodiversity:

- Detailed integration of landscaping into design elements; and
- Emphasis on use of native species in landscaping.

D. Indoor Environmental Quality:

- Enhanced indoor air quality with entryway systems, filtration, and cross-contamination prevention.
- Low-VOC materials and efficient mechanical design enhance occupant comfort.
- Daylight performance: 88% Spatial Daylight Autonomy (sDA) across the building, achieving maximum LEED points.
- Glare control (ASE mitigation) to be implemented with blinds or curtains during fit-out.

E. Materials and Construction

- Life-cycle impact reduction and sustainable procurement via Environmental Product Declarations (EPDs).
- Construction waste management plan
- Dedicated waste collection and storage zones integrated in design.

Conclusion

93. **Environmental aspects for further study**: Review of the coordinated assessment findings applicable to PA 6097/20 against the changes proposed in PA4313/25 indicate that the environmental aspects requiring further study are:

- Landscape and visual amenity
- Shading
- Microclimate

94. Evaluation of the project update indicates that the main changes in terms of environmental impacts and significance would be:

A. **Improved land use efficiency** given the additional areas added to the project, and the manner in which they allow development of further areas;
B. An **increased volume of material to be excavated** further to that originally contemplated; and
C. **Beneficial impact in terms of traffic** in Triq Santu Wistin, when access from the junction will be implemented; and
D. **Any other impacts as resulting from the studies referenced in para 93.**

95. When reviewing the above impacts, it is pertinent to note that the beneficial impacts arising from the project, in terms of connectivity between Triq Santu Wistin and Triq Elia Zammit remain unchanged. Furthermore, no further impacts in terms of traffic generation have resulted from the project update, which has overcapacity in terms of parking availability.

96. The extent of **interaction between environmental impacts** is limited given the nature or resultant impacts and the mitigation measures that are proposed. The only interaction of significance expected is that between the visual impact, where the adoption of the FAR policy facilitates the creation of public open space, and pedestrian transit between Triq Sant Wistin and Triq Elia Zammit.

97. **Cumulative impact**: The impacts from the PA4313/25 onto the surrounding areas are the same as those for PA6097/20, in that they are cumulative with the impacts arising from other developments that surround the site.

98. **Environmental risks and impacts during construction:** The risks generated via construction of the new proposal as per PA4313/25 would be identical to those encountered should the approved project (PA6097/20) be constructed. The risks posed through generation of mud and dust should be adequately managed through application of the measures required by the *Construction Site Management Regulations* (L.N. 340 of 2022). In this regard, extent of influence of the project should be limited within the site boundaries, with most risk being incurred by those areas immediately adjacent. The regulations quoted above also cater for requirements for dust control, control of storm waters and muds, and appropriate health and safety considerations.

99. A review of the environmental impacts highlights that all reasonable mitigation measures have been applied through the infrastructural design of the project. The management measures implemented through the construction management processes will be critical to successful management of environmental impacts during the construction phase.

100. **Monitoring:** a monitoring programme is to be coordinated with the construction process. The latter is to include regular and timely evaluation of all complaints and monitoring results, to ensure that all appropriate notifications and reporting to the competent authorities are submitted, and that appropriate response action is taken wherever necessary. As detailed in the original EIA, monitoring during the construction phase is expected to include:

    - noise and vibration;
    - monitoring of dust emissions during the construction phase; and
    - monitoring of demolition, excavation and construction works as may be required under the Construction Site Regulations SL552.09

Table 2: assessment of environmental impacts and risks

Impact Type and Source			Impact Receptor		Effect and Scale							Probability of Impact occurring (Inevitable, Likely, Unlikely, Remote, Uncertain	Overall impact significance (High, Moderate, Low or Negligible)	Proposed mitigation measures	Residual impact significance (High, Moderate, Low or Negligible)	Other requirements (monitoring, authorisations, etc.
Impact Type	Specific intervention leading to impact	Project phase (construction/ operation/ decommissioning)	Receptor type	Sensitivity & resilience toward impact	Direct/ Indirect/ Cumulative	Beneficial/ Adverse	Severity	Physical / geographic extent of impact	Short-/medium-/ long-term	Temporary (indicate duration)/ Permanent	Reversible (indicate ease of reversibility) / Irreversible					
Land use	Use of the land for proposed project	All	Land use	Sensitive	Direct	Beneficial	High	Project site	Long-term	Permanent	Reversible if redeveloped	Inevitable	High	Project design increasing efficient use of space.	Negligible	
Public access	creation of a public open space permeable to pedestrian traffic	Operation	Public access	Sensitive	Direct	Beneficial	High	Project site	Long-term	Permanent	Reversible only if redeveloped	Inevitable	High	Project design facilitating public access.	Negligible	
Biodiversity	dispersal of alien species currently used as landscaping	Construction	dispersal of invasive alien species on site	High sensitivty, low resilience	Direct	Beneficial	high	Project site	Long-term contribution to eradication of alien species	Permanent	Irrevesible	Inevitable	Low	Eradication of species on site	Low	
Biodiversity	use of native species in landscaping	Operation	biodiversity	High sensitivty, low resilience	Direct	Beneficial	moderate	Project site	use of native species in landscaping	Permanent	Irrevesible	high	Moderate	n/a	low	
Impact on geological features	excavation and construction processes	Construction	Geology on site	High sensitivty, low resilience	Direct	Adverse	Low	Project site	Long-term	Permanent	Irrevesible	Inevitable	Low	Vibration control measures in CMP	Negligible	Vibration monitoring
Contamination of storm waters with excavation dust	excavation and construction; release of stormwaters containing dust	Construction	Stormwaters in Triq Santu Wistin and the sea	High sensitivity, resilient once impact is removed	Direct	Adverse	High	Triq Santu Wistin and the sea if stormwaters are not properly managed	short-term	Duration of excavation and construction phase, if mitigation fails and a spill results	Reversible over the long-term	Unlikely given adequate mitigation, and containment of stormwaters on site	Low	Adherence to Construction Site Regulations SL552.09	Low	Consents emanating from the Development Planning Act Cap 552, Building Regulation Act Cap. 513
Contamination of land from HGV	excavation and construction vehicles leaking oil	Construction	Immediate proximity of site	Limited sensitivity, and resilient	Direct	Adverse	Low	Project site	short-term	Duration of excavation and construction phase	Reversible on use of spill kits	Unlikely given proper vehicle maintenance	Low	Maintenance of vehicles; spill kit on site	Low	
Ground contamination	Spillage of fuel from generator or leakage from vehicle	Operation	Project site	Limited sensitivity, resilient	Direct	Adverse	Low	Project site	Short-term given cleanup	Temporary	Reversible on use of spill kits	Unlikely given bunding of fuel storage and impermeable surfaces	Low	Bunding of fuel storage and spill kits kept on site	Low	
Discharges to water - stormwaters	Contribution to runoff to road	Operation	Storm waters in Triq Santu Wistin	High sensitivity, resilient once impact is removed	Cumulative	Adverse	Low to moderate	Triq Santu Wistin and the sea	long term	duration of rain episodes	Unlikely to be reversible	Inevitable	Low to moderate	Water storage reservoir	Low	
Waste generation - inert wastes	excavation and construction off-cuts/debris	Construction	quarry void space for backfill	High sensitivity, receptor not resilient	Direct	Adverse	high	Quarry void space	long-term	Permanent	Unlikely to be reversible	Remote given commitment to recycling	Low	Maximise reuse of material on site	Low	Use of permtted facilities for backfill as per Subsidiary Legislation 549.50 and Subsidiary Legislation 549.63

Impact Type and Source			Impact Receptor		Effect and Scale							Probability of Impact occurring (Inevitable, Likely, Unlikely, Remote, Uncertain	Overall impact significance (High, Moderate, Low or Negligible)	Proposed mitigation measures	Residual impact significance (High, Moderate, Low or Negligible)	Other requirements (monitoring, authorisations, etc.
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Waste generation - other wastes	Construction offcuts and debris	Construction	ability to divert from landfill	Limited sensitivity, not resilient	Direct	Adverse	medium	Disposal facilities	long-term	Permanent	Unlikely to be reversible	Inevitable generation of non-recyclables	Low mgiven predicted limited amounts	Provision of facilities to segregate recyclables	Low	Consider waste managmeent within construction management plan details
Waste generation	Generation of wastes from residences, offices and commercial	Operation	waste facilities for disposal and recycling	Limited sensitivity, resilient	Cumulative	Adverse	Low	Waste facilities	Long-term	Permanent	Irreversible	Inevitable	Contribution to cumulative impact	Provision of facilities to segregate recyclables and other waste streams	Low	Waste Regulations
Emissions to air - dust	excavation and construction processes involving dust generation through excavation; also cutting, drilling, and grinding	Construction	Surrounding land uses, (residences, offices, hospitality)	Sensitive, resilient once impact is removed	Direct	Adverse	High	Mainly the immediate surroundings, but depends on wind transport	short-term	Duration of excavation and construction phase	Reversible once mitigation measures are applied correctly	Unlikely given adequate mitigation	Low	Adherence to Construction Site Regulations SL552.09	Low	Consents emanating from the Development Planning Act Cap 552, Building Regulation Act Cap. 513
Emissions to air - traffic	Emissions from trtaffic	all	Surrounding land uses, (residences, offices, hospitality)	Sensitive, resilient once impact is removed	Direct	Adverse	High	Mainly the immediate surroundings, but depends on wind transport	short to medium term (until fleet is electrified)	Permanent until fleet is electrified	Reversible only once fleet is electrified	Inevitable	Low	Green transport plan; Encouraging pedestrianisation through improvement of the street environment and urban fabric; a safer pedestrian link facilitating access to public transport stops; Cycle racks, and end of journey facilities such as changing rooms; Promotion of pedestrian links and routes to the neighbouring areas	Slight to moderate	
Noise pollution	excavation and construction equipment	Construction	Surrounding land uses, (residences, offices, hospitality)	High sensitivity, resilient once impact is removed	High sensitivity, resilient once impact is removed	Adverse	Moderate	Mainly the immediate surroundings, but also affected by wind transport	short-term	Duration of excavation and construction phase, if mitigation fails	Reversible	Unlikely given adequate mitigation	Low	Adherence to Construction Site Regulations SL552.09	Low	Consents emanating from the Development Planning Act Cap 552, Building Regulation Act Cap. 513
Noise pollution	Site operations	Operation	Surrounding land uses, (residences, offices, hospitality)	High sensitivity, resilient once impact is removed	High sensitivity, resilient once impact is removed	Neutral	Negligible	Mainly the immediate surroundings	long-term	Permanent	Reversible	Remote	Negligible	Good neighbourliness	Low	

Impact Type and Source			Impact Receptor		Effect and Scale							Probability of Impact occurring (Inevitable, Likely, Unlikely, Remote, Uncertain	Overall impact significance (High, Moderate, Low or Negligible)	Proposed mitigation measures	Residual impact significance (High, Moderate, Low or Negligible)	Other requirements (monitoring, authorisations, etc.
Impact Type	Specific intervention leading to impact	Project phase (construction/ operation/ decommissioning)	Receptor type	Sensitivity & resilience toward impact	Direct/ Indirect/ Cumulative	Beneficial/ Adverse	Severity	Physical / geographic extent of impact	Short-/medium-/ long-term	Temporary (indicate duration)/ Permanent	Reversible (indicate ease of reversibility) / Irreversible					
Noise pollution	Site operations	Site operations	Surrounding land uses, (residences, offices, hospitality)	High sensitivity, resilient once impact is removed	High sensitivity, resilient once impact is removed	Adverse	Moderate	Mainly the immediate surroundings, but also affected by wind transport	short-term	Duration of excavation and construction phase, if mitigation fails	Reversible	Remote	Moderate	Onsite management as per CMP (see section F)	Negligible	
Vibration	excavation and construction	excavation and construction	Surrounding land uses, (residences, offices, hospitality)	High sensitivity, resilient once impact is removed	High sensitivity, resilient once impact is removed	Adverse	Moderate	Mainly the immediate surroundings, but also affected by wind transport	short-term	Duration of excavation and construction phase, if mitigation fails	Reversible	Remote	Moderate	Onsite management as per CMP (see section F)	Negligible	
Microclimate	Aspects of final design creating airflow that disturbs intended use of surrounding space	Operation	Surrounding open areas	Sensitive, resilient on mitigation	Direct	Adverse	Expected low	Surrounding open areas	Long-term	Permanent	Reversible on inclusion of mitigation	Remote following mitigation	Low	Wind study on final structure defines structural engineering requirements, and identifies mitigation of required e.g. baffles, canopy	Unlikely, given that this is required to ensure that detailed design and function of building	Completion fo study rcommended in EIA
Shading	Presence of built structure casting shade	Operation	Area identified in solar path study	Sensitive	Direct	Adverse	Low to moderate, depending on duration of shadow	Area reached by shadow	Long-term	Permanent	Irreversible	Inevitable	Contribution to cumulative impact	n/a	n/a	Update to previous study
Light pollution	Lighting design	Operation	Viewpoints as per Zone of Visual Impact	Sensitive	Cumulative	Adverse	Low	Zone of Visual Impact	Long-term	Permanent	Irreversible	Inevitable	Contribution to cumulative impact	Appropriate lighting to mitigate contribution to skyglow, glare	Low given that this will consist in an increment over the current scenario	

Annex A – Plans

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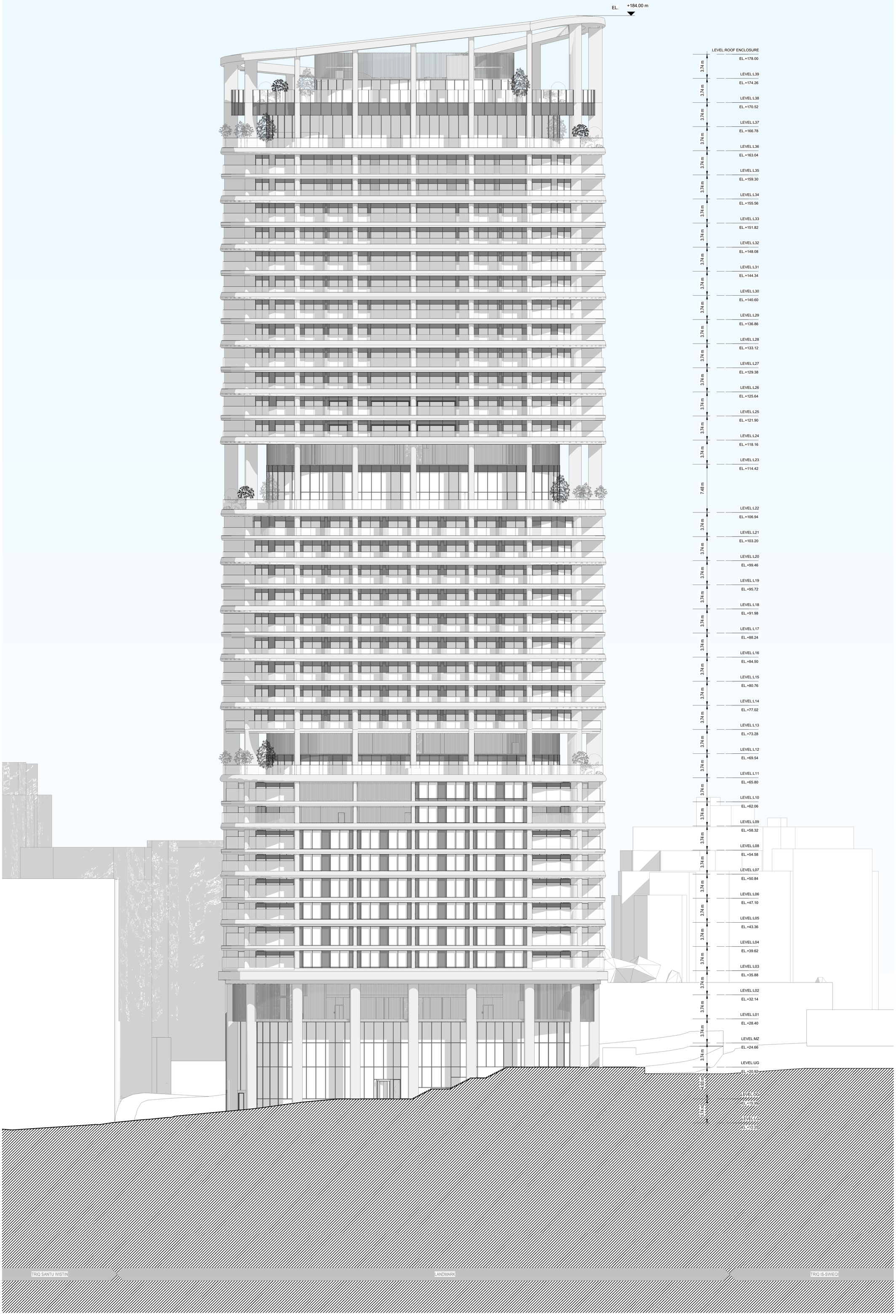

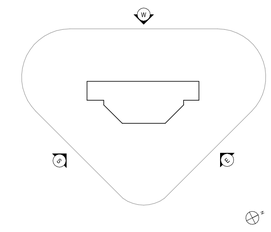

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PLM

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WEST ELEVATION

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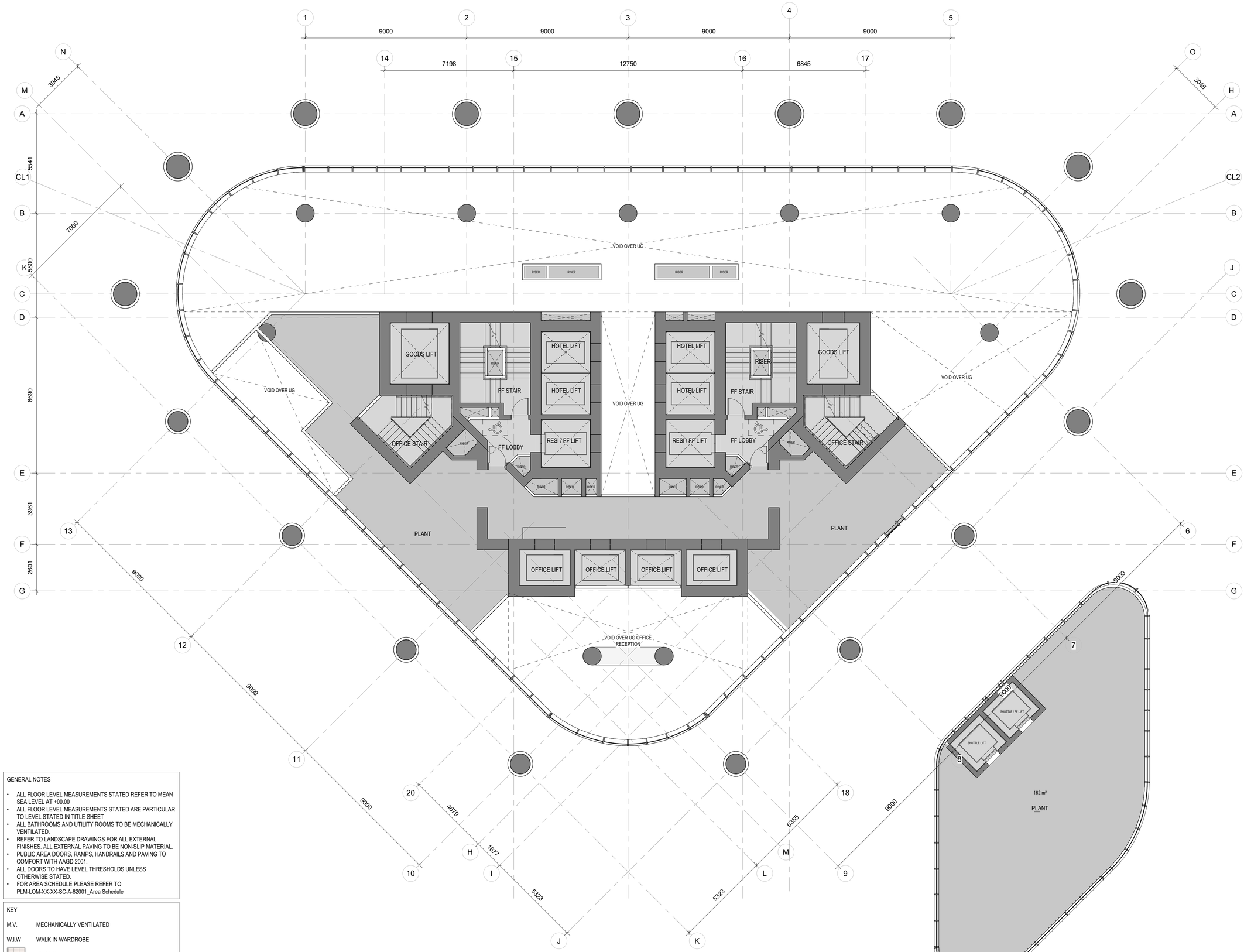

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
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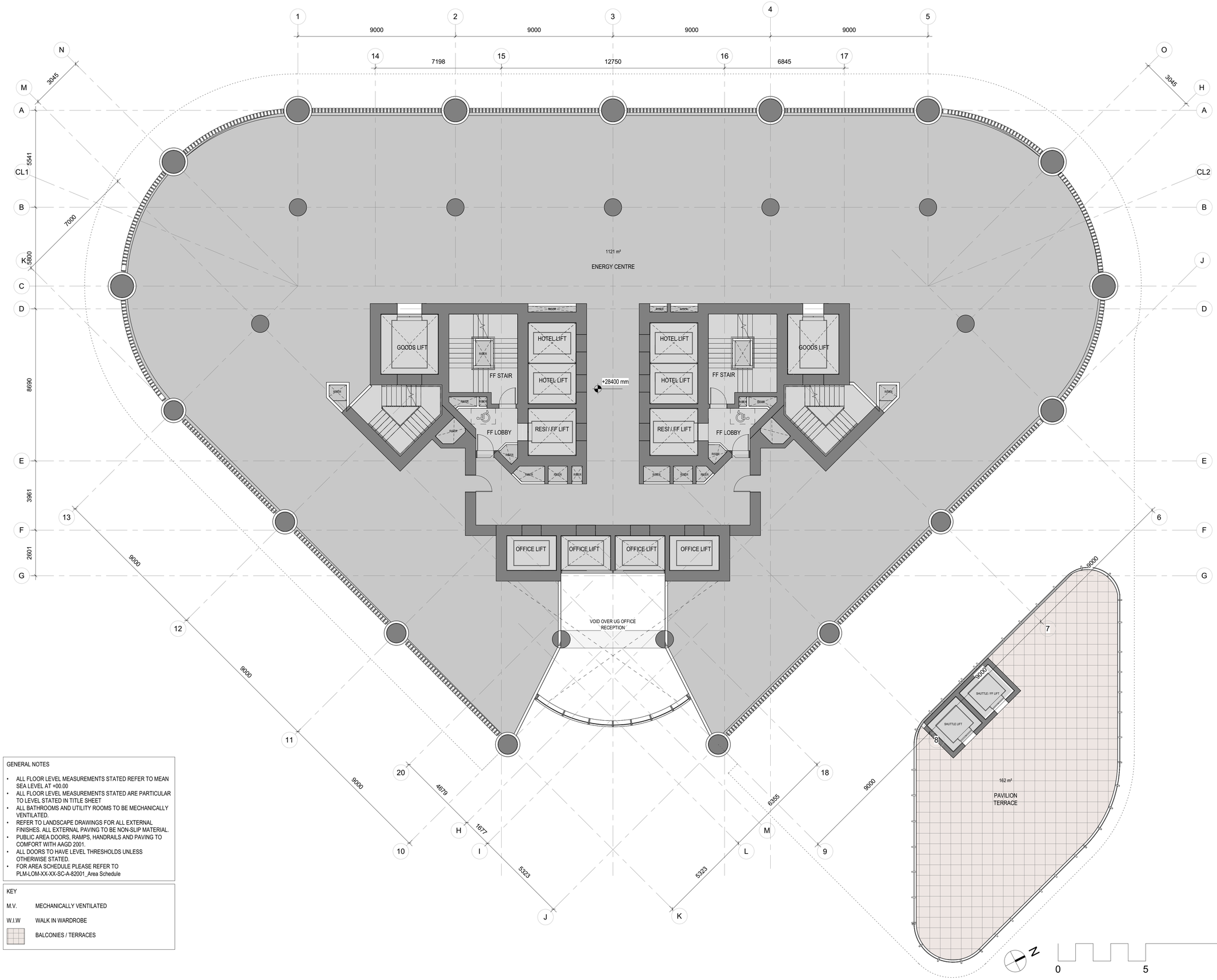

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LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
LV B1	BASEMENT 1	
LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

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PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L01 GA PLANT

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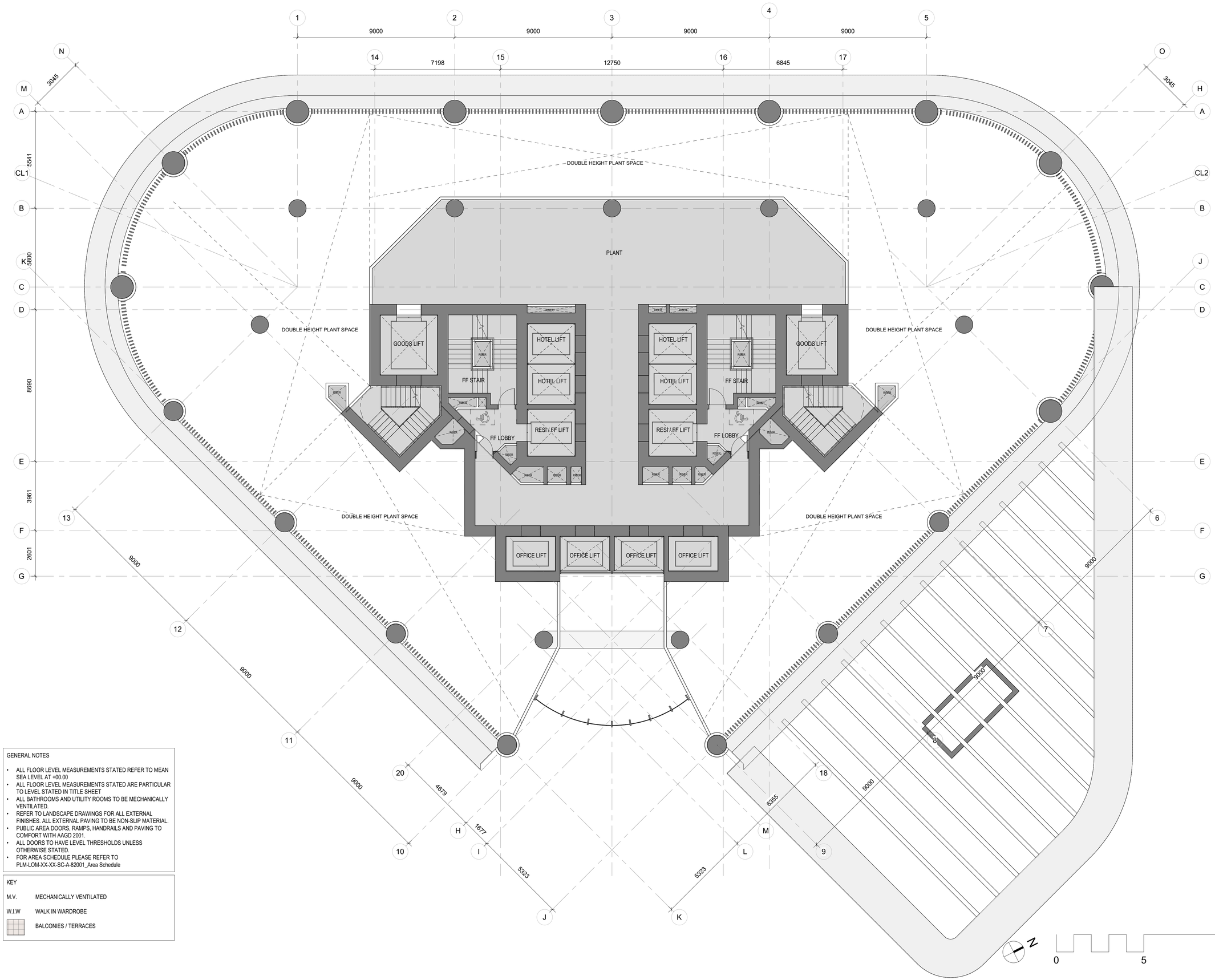

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LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
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PLM

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L02 GA PLANT

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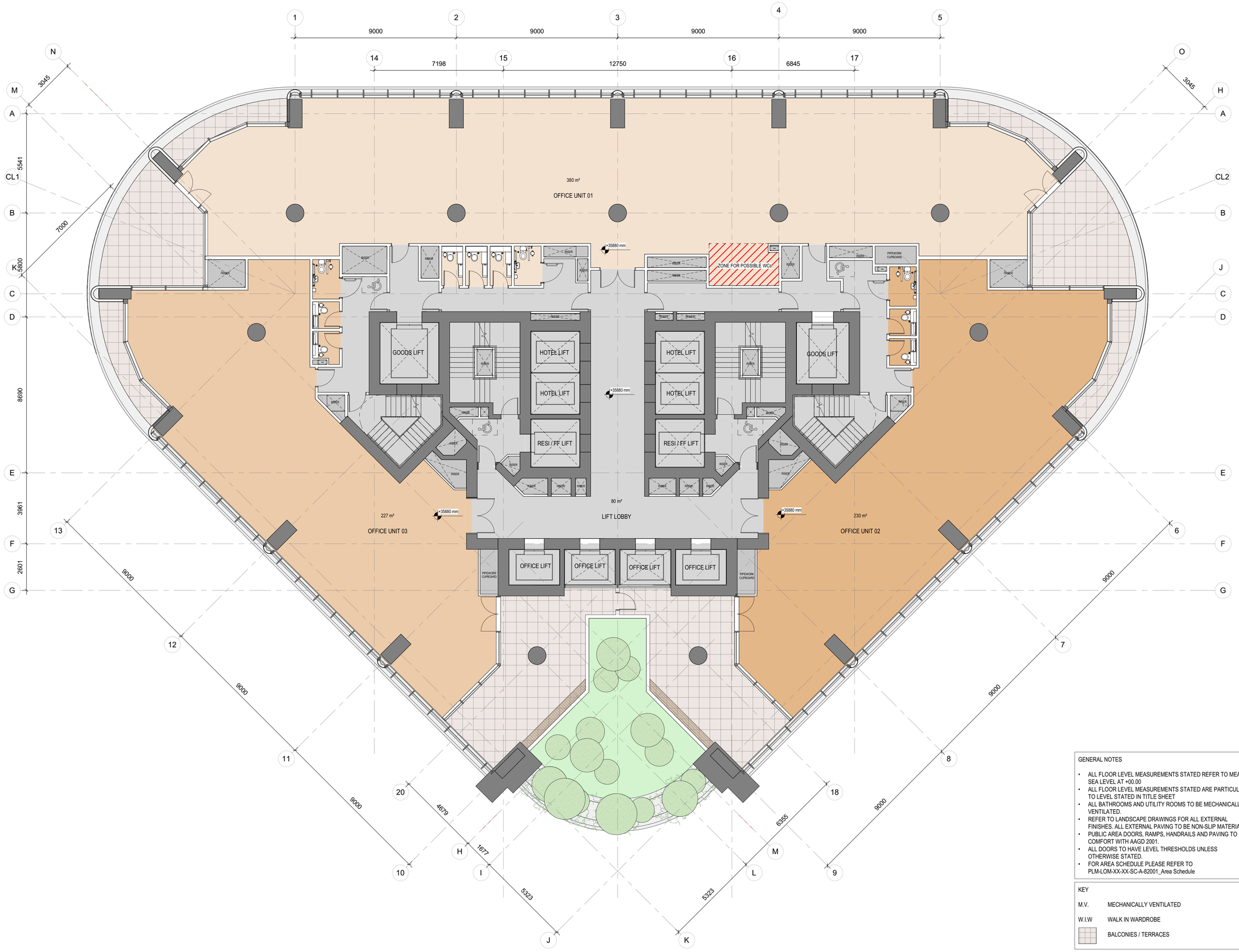

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LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG	O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
LV B1	BASEMENT 1	
LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L03 GA OFFICE TYPE A

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-03-DR-A-P11003

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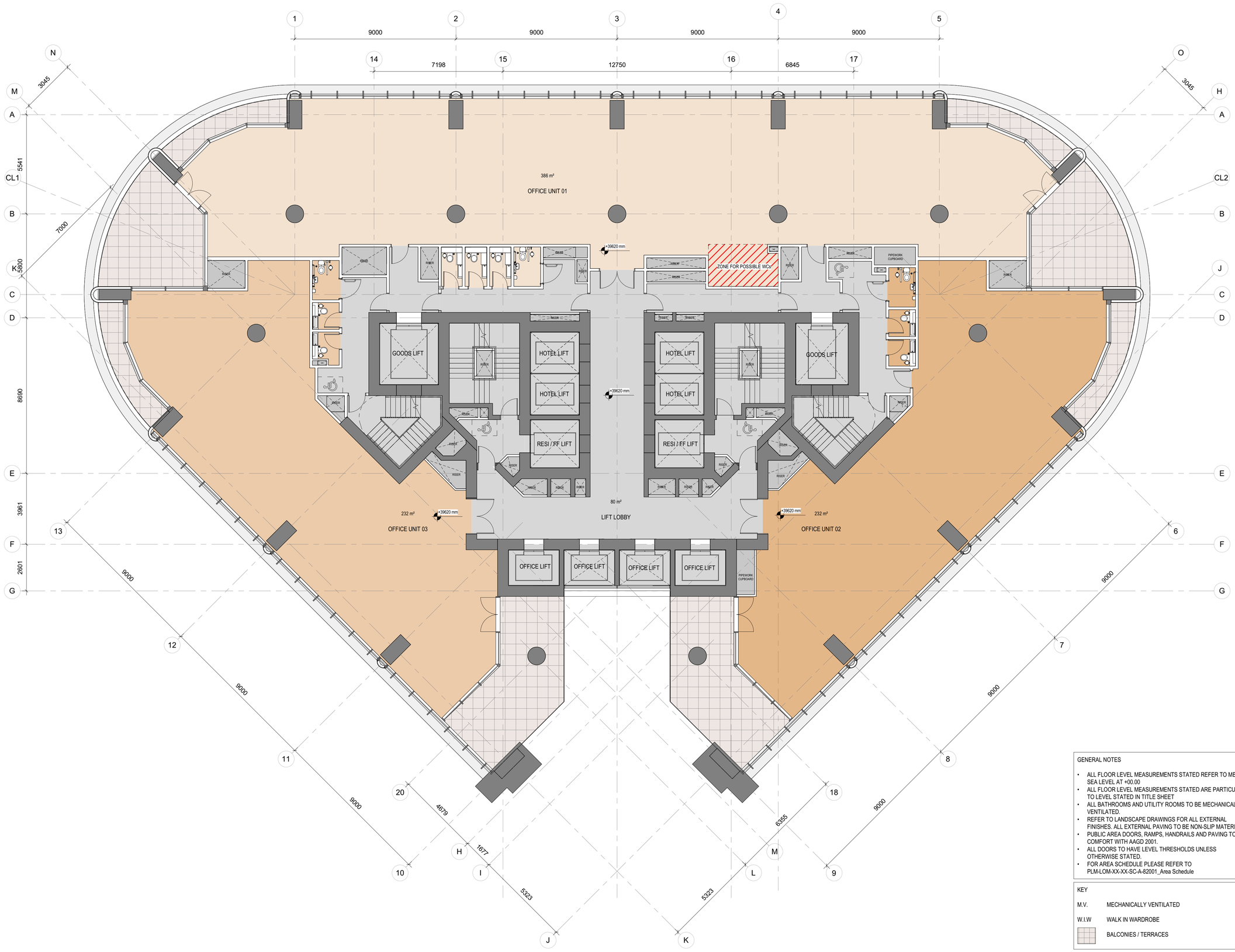

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MR	BT

LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG	O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
LV B1	BASEMENT 1	
LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L04 GA OFFICE TYPE B

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-04-DR-A-P11004

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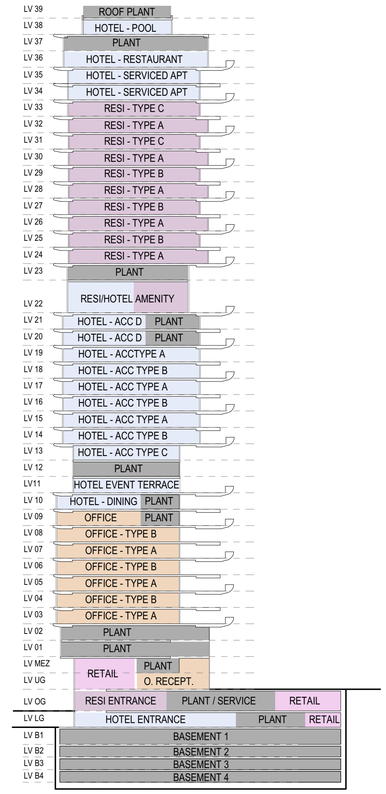
REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MR	BT



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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L09 GA OFFICE/PLANT

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-09-DR-A-P11009

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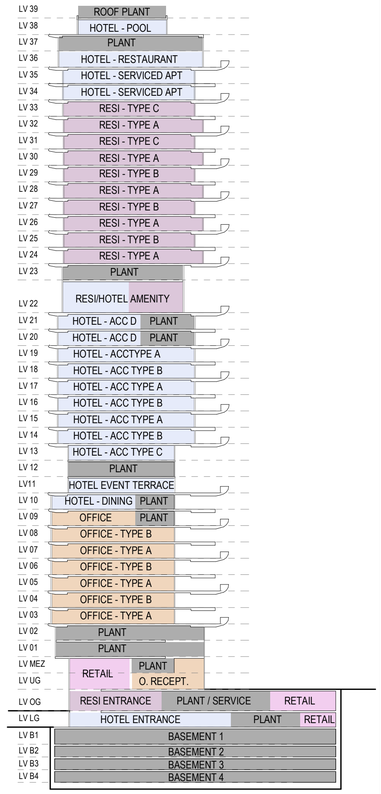
REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT



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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L10 GA PLAN HOTEL DINING

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-10-DR-A-P11010

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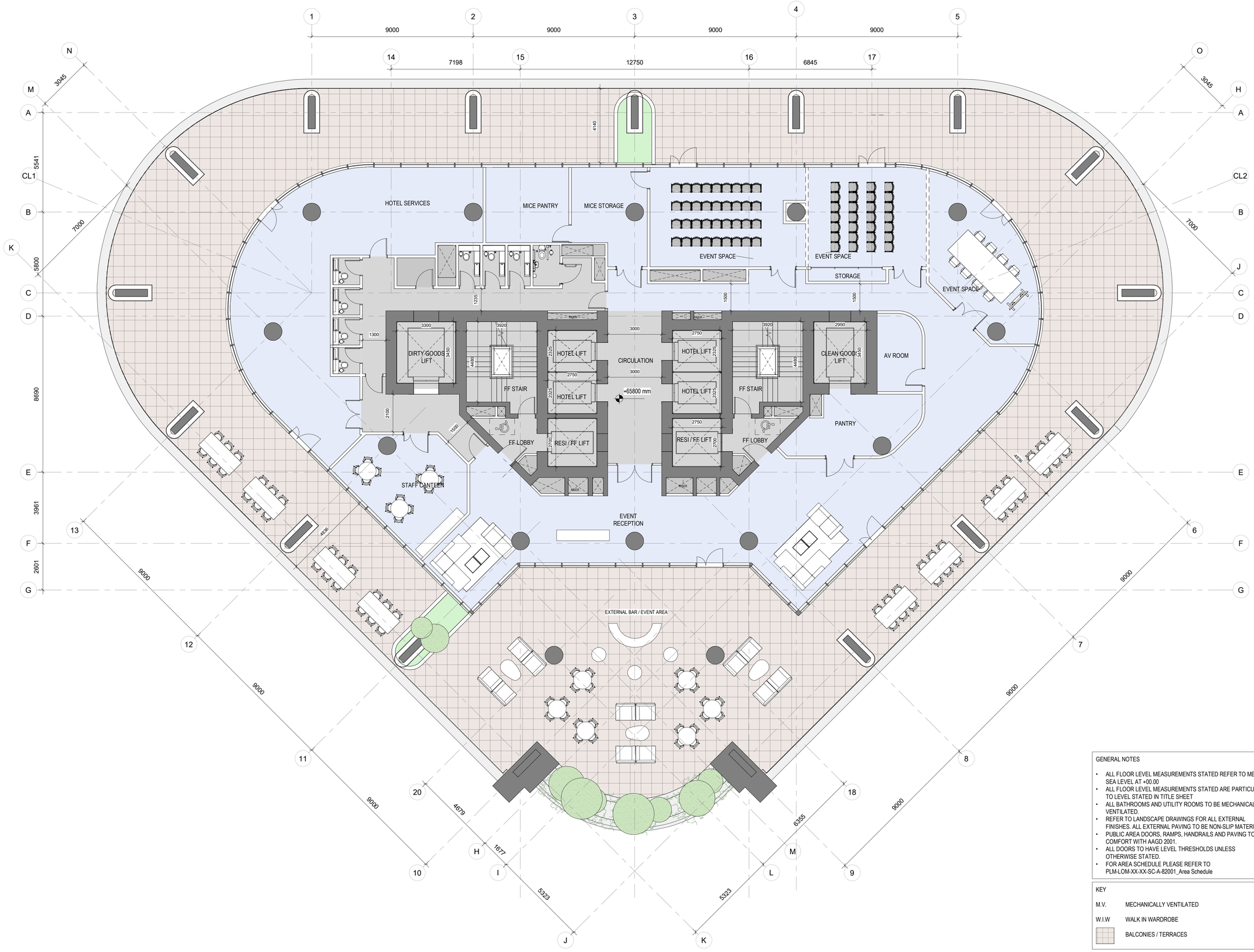

LV 39	ROOF PLANT
LV 38	HOTEL - POOL
LV 37	PLANT
LV 36	HOTEL - RESTAURANT
LV 35	HOTEL - SERVICED APT
LV 34	HOTEL - SERVICED APT
LV 33	RESI - TYPE C
LV 32	RESI - TYPE A
LV 31	RESI - TYPE C
LV 30	RESI - TYPE A
LV 29	RESI - TYPE B
LV 28	RESI - TYPE A
LV 27	RESI - TYPE B
LV 26	RESI - TYPE A
LV 25	RESI - TYPE B
LV 24	RESI - TYPE A
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LV 20	HOTEL - ACC D / PLANT
LV 19	HOTEL - ACCTYPE A
LV 18	HOTEL - ACC TYPE B
LV 17	HOTEL - ACC TYPE A
LV 16	HOTEL - ACC TYPE B
LV 15	HOTEL - ACC TYPE A
LV 14	HOTEL - ACC TYPE B
LV 13	HOTEL - ACC TYPE C
LV 12	PLANT
LV11	HOTEL EVENT TERRACE
LV 10	HOTEL - DINING / PLANT
LV 09	OFFICE / PLANT
LV 08	OFFICE - TYPE B
LV 07	OFFICE - TYPE A
LV 06	OFFICE - TYPE B
LV 05	OFFICE - TYPE A
LV 04	OFFICE - TYPE B
LV 03	OFFICE - TYPE A
LV 02	PLANT
LV 01	PLANT
LV MEZ	RETAIL / PLANT
LV UG	O. RECEPT.
LV OG	RESI ENTRANCE / PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE / PLANT / RETAIL
LV B1	BASEMENT 1
LV B2	BASEMENT 2
LV B3	BASEMENT 3
LV B4	BASEMENT 4

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L11 GA PLAN HOTEL EVENT SPACE

sheet size	scale	revision
A1	1:100@ A1	P1

status: STAGE 2
approved by: BT

drawing no.
PLM-LOM-ZZ-11-DR-A-P11011

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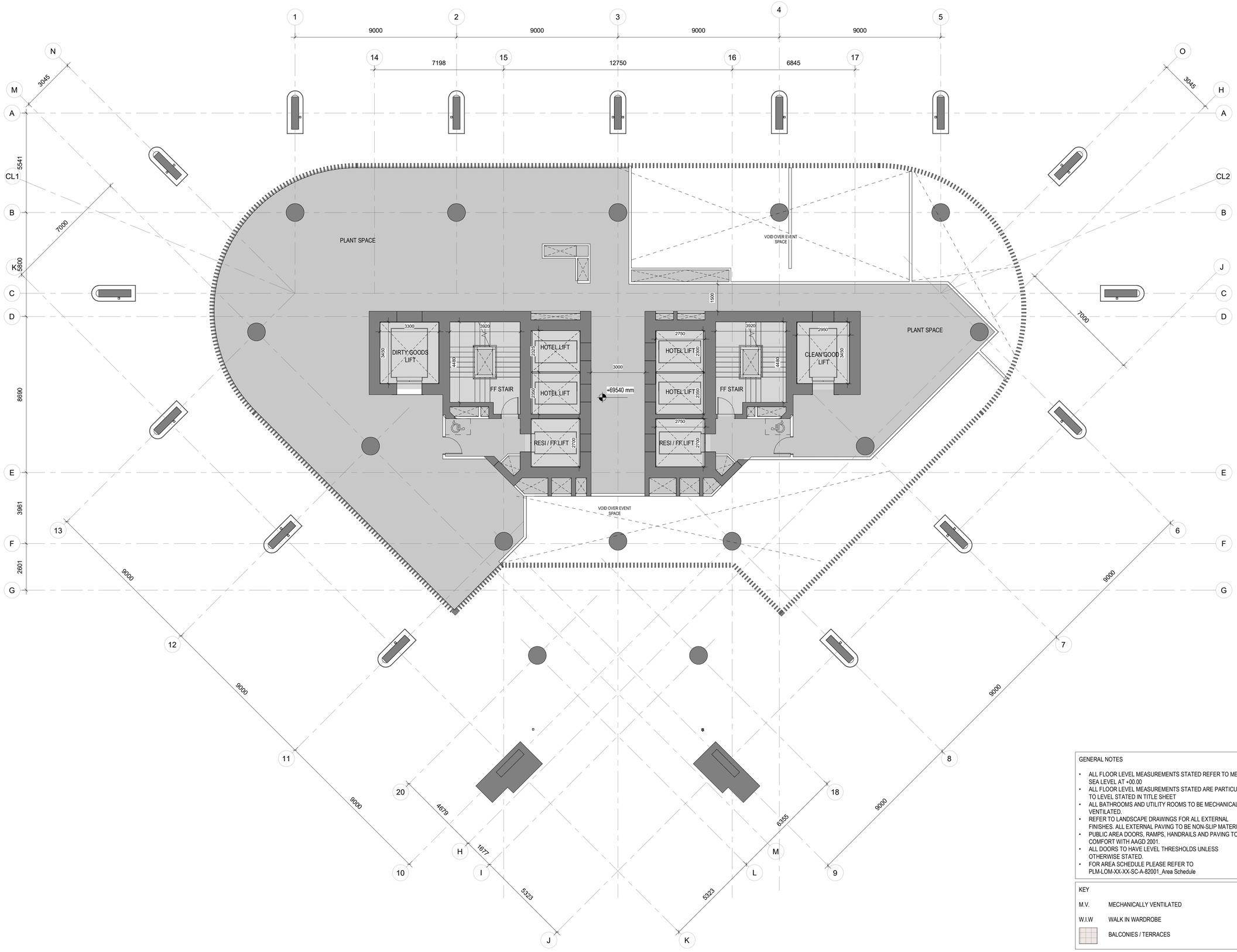

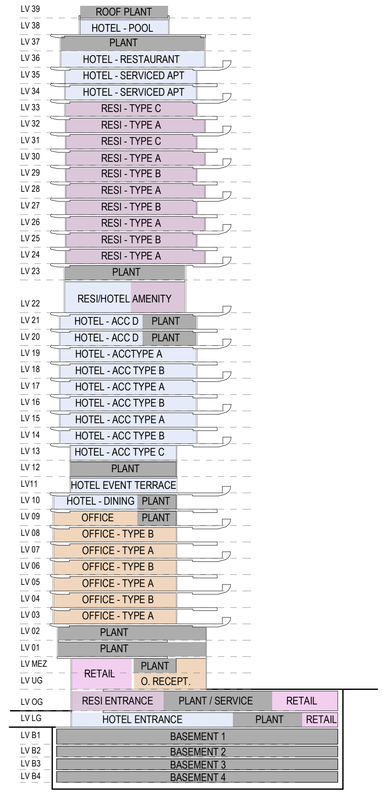

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L12 GA PLAN PLANT

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-12-DR-A-P11012

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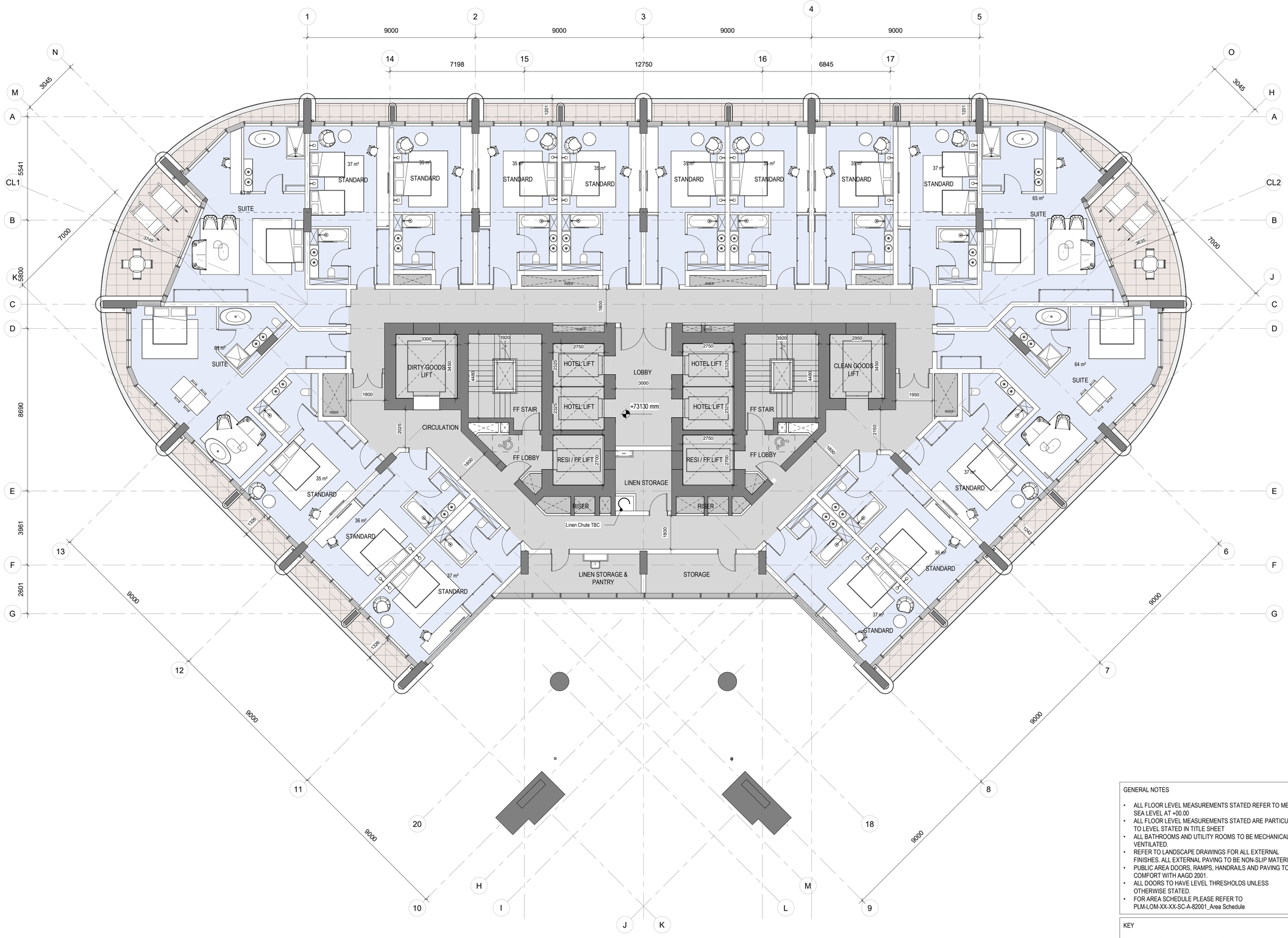

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

LV 39	ROOF PLANT
LV 38	HOTEL - POOL
LV 37	PLANT
LV 36	HOTEL - RESTAURANT
LV 35	HOTEL - SERVICED APT
LV 34	HOTEL - SERVICED APT
LV 33	RESI - TYPE C
LV 32	RESI - TYPE A
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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L13 GA PLAN HOTEL ACC TYPE C

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-13-DR-A-P11013

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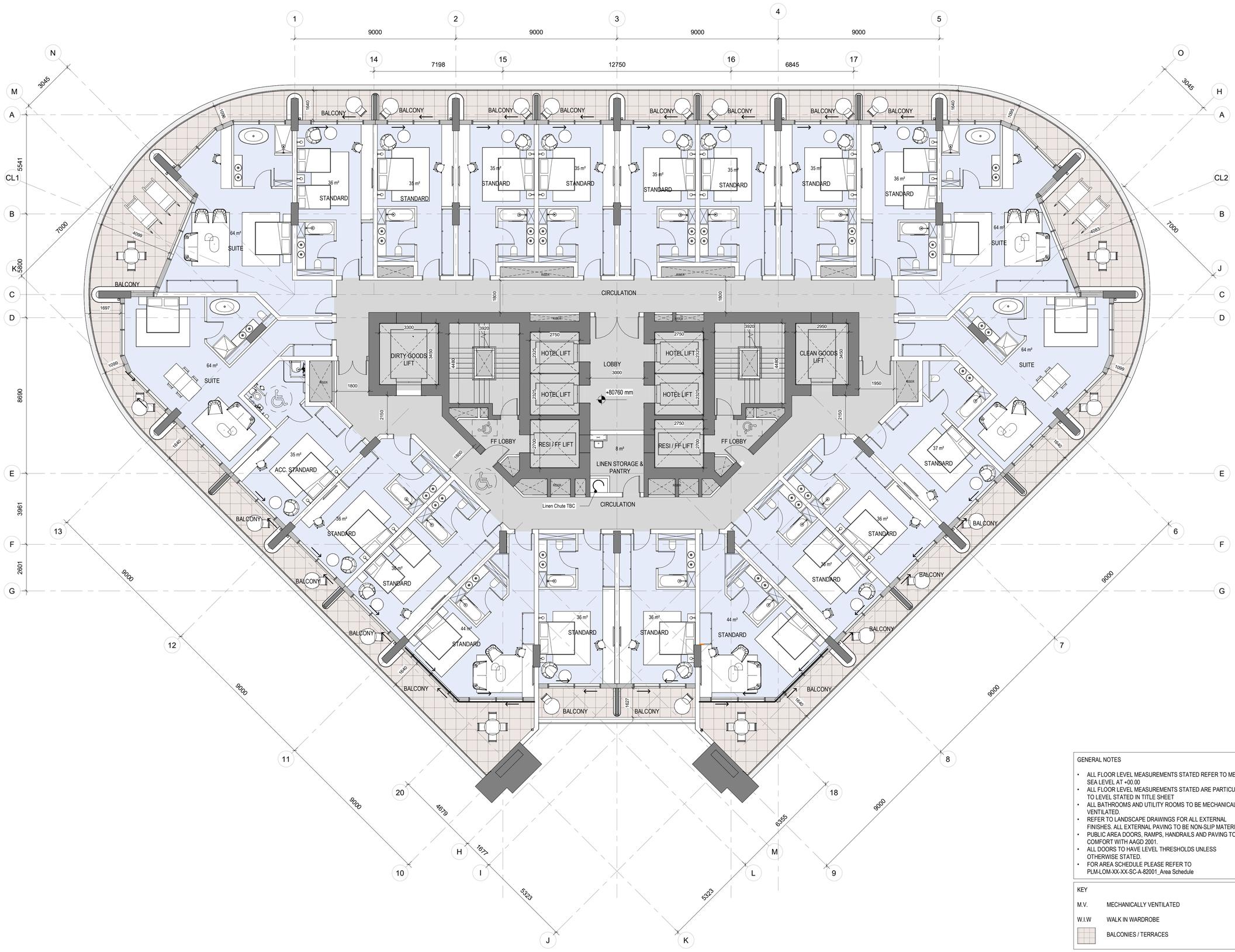

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	OC	BT
P2	28.02.25	PLANNING ISSUE	MB	BT

LV 39	ROOF PLANT		
LV 38	HOTEL - POOL		
LV 37	PLANT		
LV 36	HOTEL - RESTAURANT		
LV 35	HOTEL - SERVICED APT		
LV 34	HOTEL - SERVICED APT		
LV 33	RESI - TYPE C		
LV 32	RESI - TYPE A		
LV 31	RESI - TYPE C		
LV 30	RESI - TYPE A		
LV 29	RESI - TYPE B		
LV 28	RESI - TYPE A		
LV 27	RESI - TYPE B		
LV 26	RESI - TYPE A		
LV 25	RESI - TYPE B		
LV 24	RESI - TYPE A		
LV 23	PLANT		
LV 22	RESI/HOTEL AMENITY		
LV 21	HOTEL - ACC D	PLANT	
LV 20	HOTEL - ACC D	PLANT	
LV 19	HOTEL - ACCTYPE A		
LV 18	HOTEL - ACC TYPE B		
LV 17	HOTEL - ACC TYPE A		
LV 16	HOTEL - ACC TYPE B		
LV 15	HOTEL - ACC TYPE A		
LV 14	HOTEL - ACC TYPE B		
LV 13	HOTEL - ACC TYPE C		
LV 12	PLANT		
LV11	HOTEL EVENT TERRACE		
LV 10	HOTEL - DINING	PLANT	
LV 09	OFFICE	PLANT	
LV 08	OFFICE - TYPE B		
LV 07	OFFICE - TYPE A		
LV 06	OFFICE - TYPE B		
LV 05	OFFICE - TYPE A		
LV 04	OFFICE - TYPE B		
LV 03	OFFICE - TYPE A		
LV 02	PLANT		
LV 01	PLANT		
LV MEZ	RETAIL	PLANT	
LV UG		O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE	RETAIL
LV LG	HOTEL ENTRANCE	PLANT	RETAIL
LV B1	BASEMENT 1		
LV B2	BASEMENT 2		
LV B3	BASEMENT 3		
LV B4	BASEMENT 4		

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L15 GA PLAN HOTEL ACC TYPE A

sheet size	scale	revision
A1	1:100@ A1	P2

status	approved by
PLANNING	BT

drawing no.
PLM-LOM-ZZ-15-DR-A-P11015

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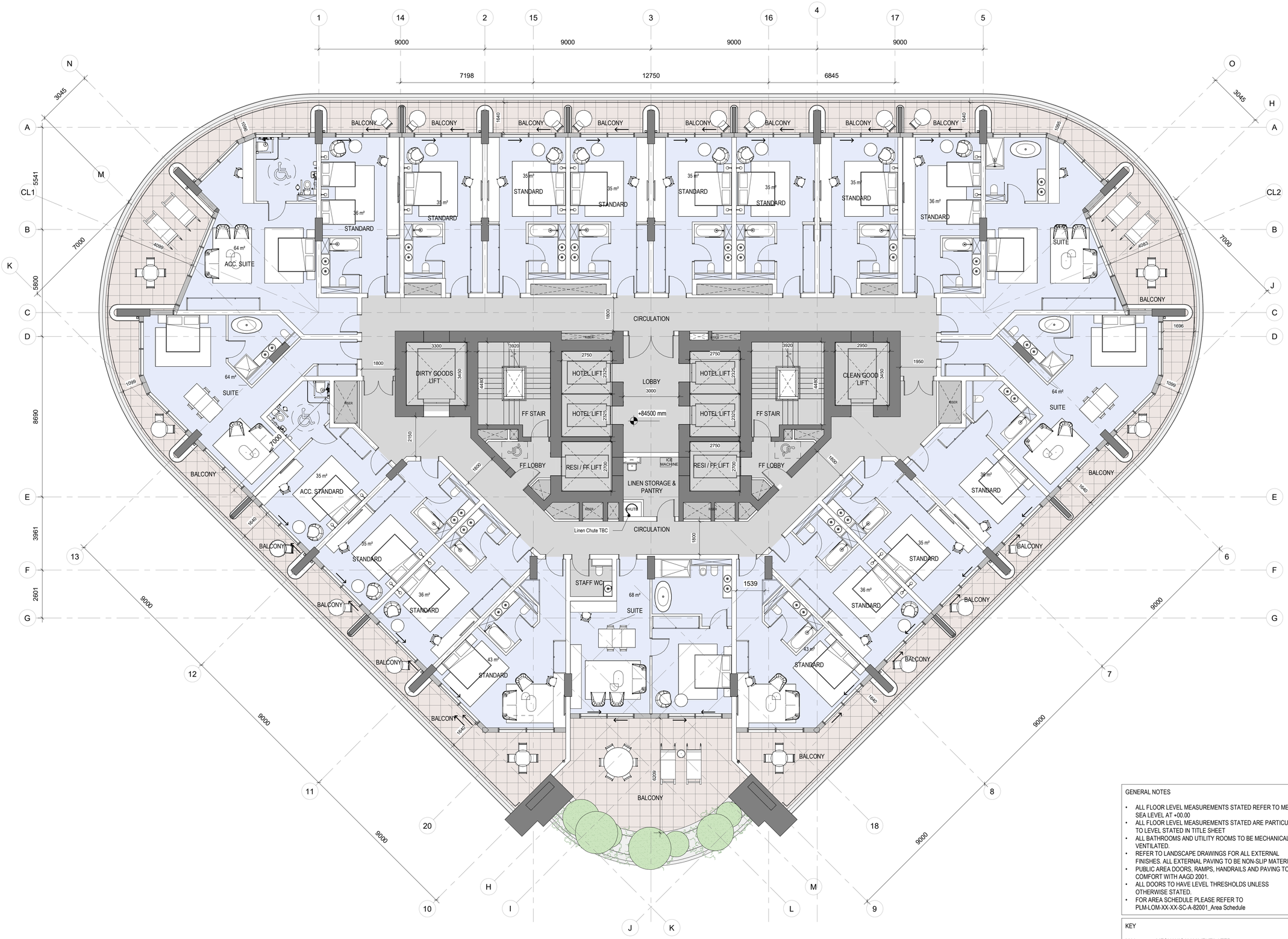

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

LV 39	ROOF PLANT		
LV 38	HOTEL - POOL		
LV 37	PLANT		
LV 36	HOTEL - RESTAURANT		
LV 35	HOTEL - SERVICED APT		
LV 34	HOTEL - SERVICED APT		
LV 33	RESI - TYPE C		
LV 32	RESI - TYPE A		
LV 31	RESI - TYPE C		
LV 30	RESI - TYPE A		
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LV 28	RESI - TYPE A		
LV 27	RESI - TYPE B		
LV 26	RESI - TYPE A		
LV 25	RESI - TYPE B		
LV 24	RESI - TYPE A		
LV 23	PLANT		
LV 22	RESI/HOTEL AMENITY		
LV 21	HOTEL - ACC D	PLANT	
LV 20	HOTEL - ACC D	PLANT	
LV 19	HOTEL - ACCTYPE A		
LV 18	HOTEL - ACC TYPE B		
LV 17	HOTEL - ACC TYPE A		
LV 16	HOTEL - ACC TYPE B		
LV 15	HOTEL - ACC TYPE A		
LV 14	HOTEL - ACC TYPE B		
LV 13	HOTEL - ACC TYPE C		
LV 12	PLANT		
LV11	HOTEL EVENT TERRACE		
LV 10	HOTEL - DINING	PLANT	
LV 09	OFFICE	PLANT	
LV 08	OFFICE - TYPE B		
LV 07	OFFICE - TYPE A		
LV 06	OFFICE - TYPE B		
LV 05	OFFICE - TYPE A		
LV 04	OFFICE - TYPE B		
LV 03	OFFICE - TYPE A		
LV 02	PLANT		
LV 01	PLANT		
LV MEZ	RETAIL	PLANT	
LV UG		O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE	RETAIL
LV LG	HOTEL ENTRANCE	PLANT	RETAIL
LV B1	BASEMENT 1		
LV B2	BASEMENT 2		
LV B3	BASEMENT 3		
LV B4	BASEMENT 4		

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L16 GA PLAN HOTEL ACC TYPE B

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-16-DR-A-P11016

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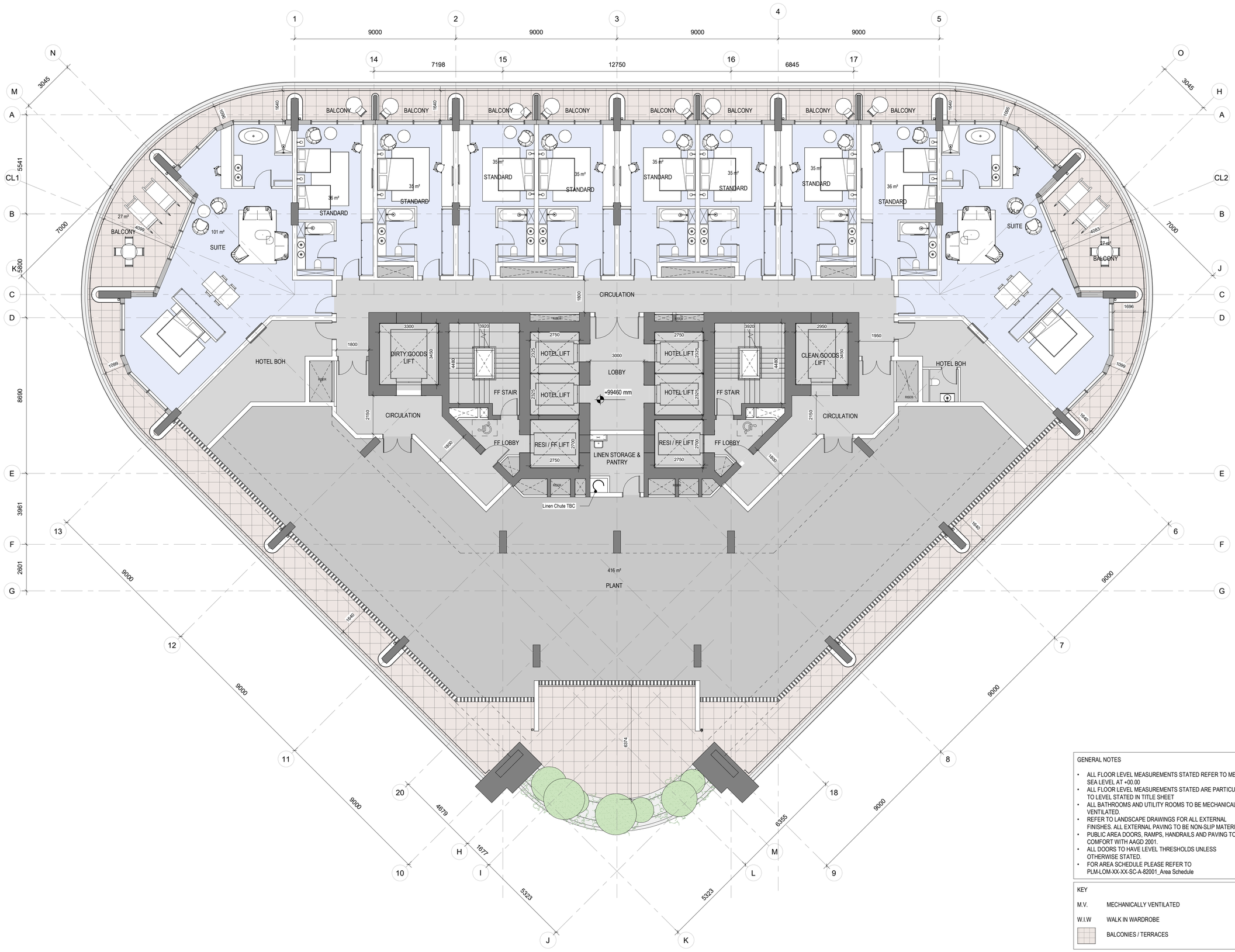

USE OF DRAWINGS

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
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LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L20 GA PLAN HOTEL ACC TYPE D

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-20-DR-A-P11020

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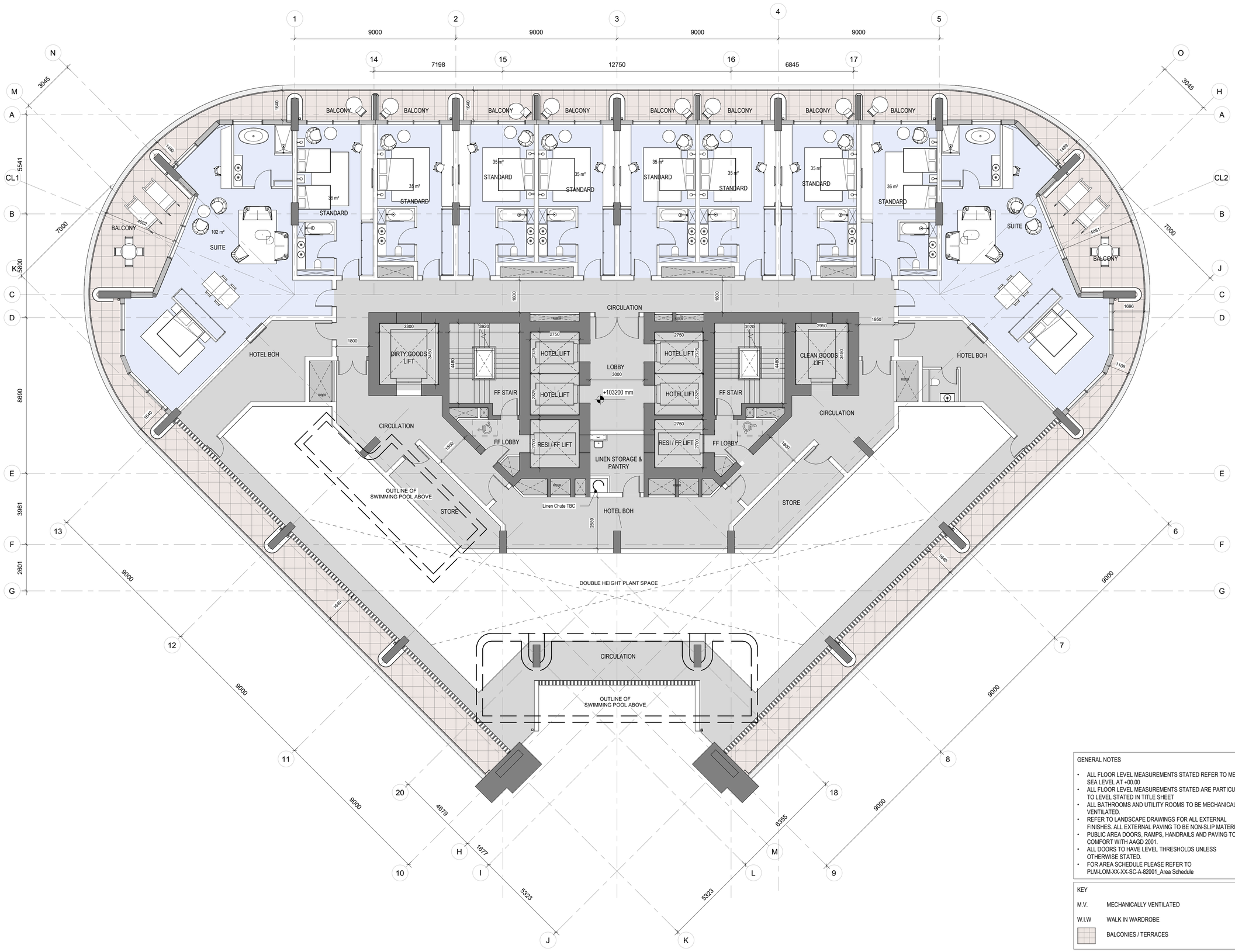

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REVISIONS

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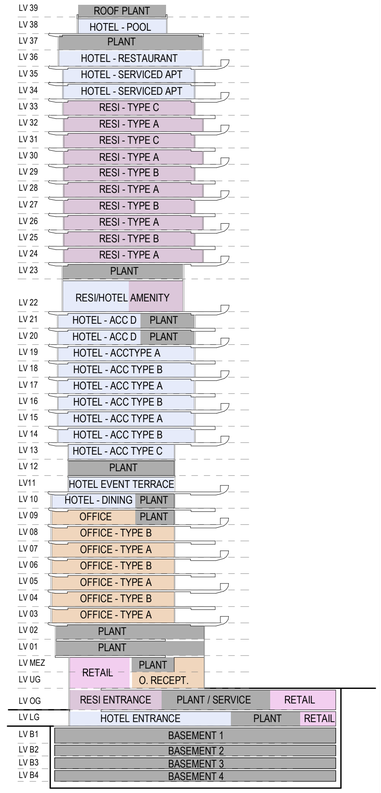
P1	28.02.25	PLANNING ISSUE	MB	BT



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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L21 GA PLAN HOTEL ACC TYPE D

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-21- DR-A- P11021

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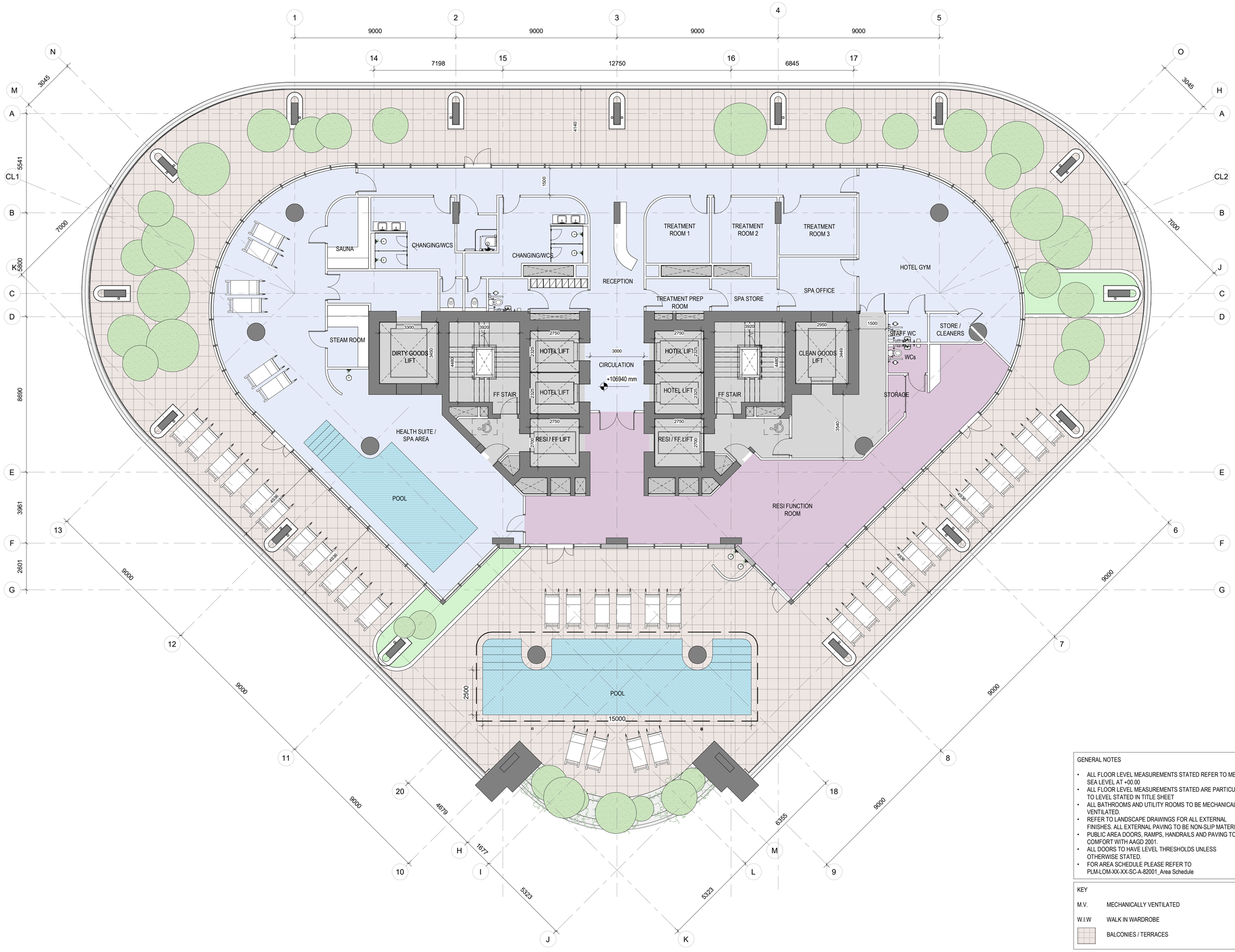
Web www.lom-architecture.com



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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
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LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L22 GA PLAN HOTEL/RESI AMENITY

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-22-DR-A-P11022

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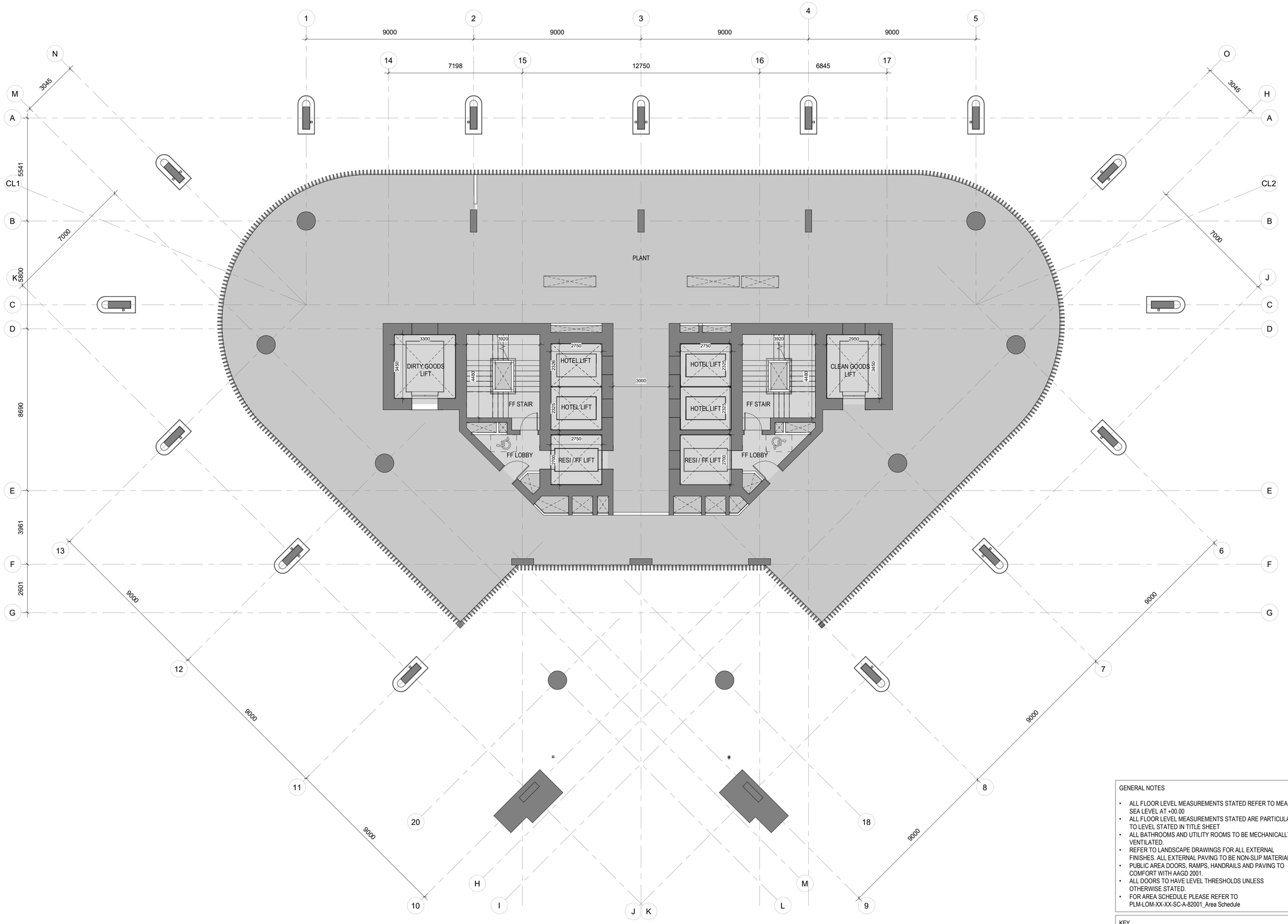

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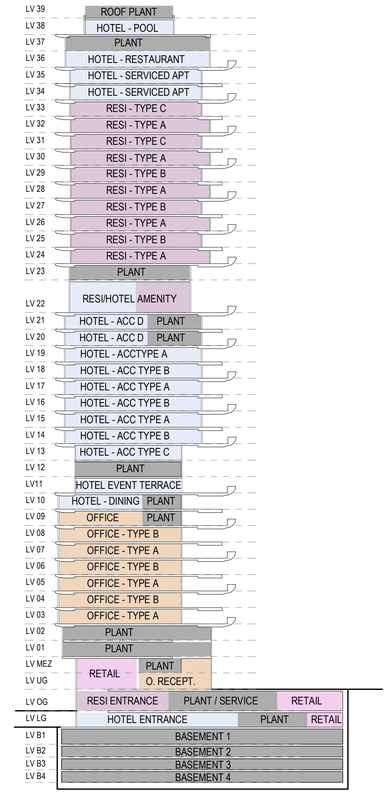
REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT



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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

LOM

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L23 GA PLAN PLANT

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-23-DR-A-P11023

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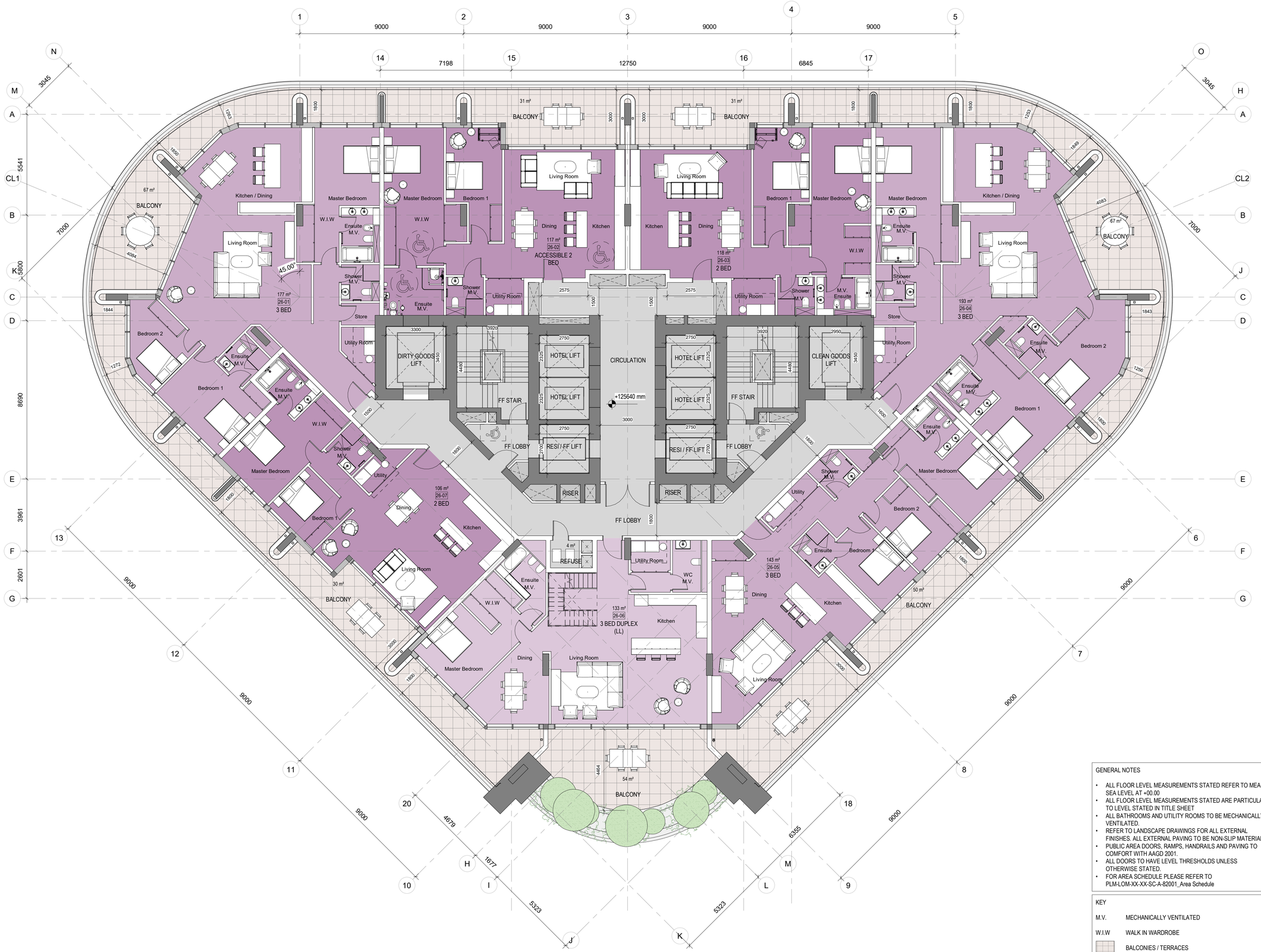

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	JY	BT

LV 39	ROOF PLANT		
LV 38	HOTEL - POOL		
LV 37	PLANT		
LV 36	HOTEL - RESTAURANT		
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LV 22	RESI/HOTEL AMENITY		
LV 21	HOTEL - ACC D	PLANT	
LV 20	HOTEL - ACC D	PLANT	
LV 19	HOTEL - ACCTYPE A		
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LV 02	PLANT		
LV 01	PLANT		
LV MEZ	RETAIL	PLANT	
LV UG		O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE	RETAIL
LV LG	HOTEL ENTRANCE	PLANT	RETAIL
LV B1	BASEMENT 1		
LV B2	BASEMENT 2		
LV B3	BASEMENT 3		
LV B4	BASEMENT 4		

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L26 GA RESI A

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-26-DR-A-P11026

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	JY	BT

LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG	O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
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LV B3	BASEMENT 3	
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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L27 GA RESI B

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-27-DR-A-P11027

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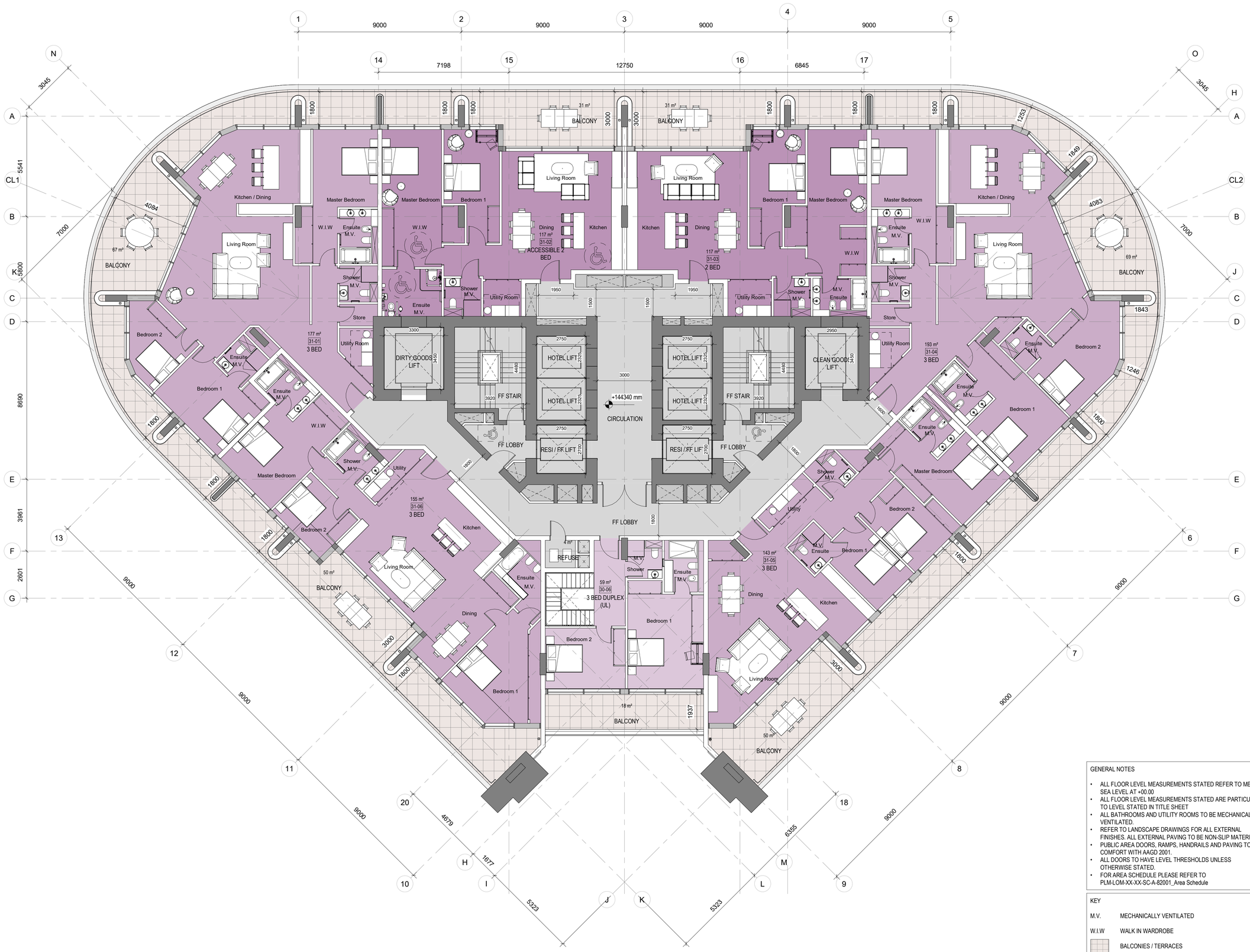

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LV 37	PLANT		
LV 36	HOTEL - RESTAURANT		
LV 35	HOTEL - SERVICED APT		
LV 34	HOTEL - SERVICED APT		
LV 33	RESI - TYPE C		
LV 32	RESI - TYPE A		
LV 31	RESI - TYPE C		
LV 30	RESI - TYPE A		
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LV 28	RESI - TYPE A		
LV 27	RESI - TYPE B		
LV 26	RESI - TYPE A		
LV 25	RESI - TYPE B		
LV 24	RESI - TYPE A		
LV 23	PLANT		
LV 22	RESI/HOTEL AMENITY		
LV 21	HOTEL - ACC D	PLANT	
LV 20	HOTEL - ACC D	PLANT	
LV 19	HOTEL - ACCTYPE A		
LV 18	HOTEL - ACC TYPE B		
LV 17	HOTEL - ACC TYPE A		
LV 16	HOTEL - ACC TYPE B		
LV 15	HOTEL - ACC TYPE A		
LV 14	HOTEL - ACC TYPE B		
LV 13	HOTEL - ACC TYPE C		
LV 12	PLANT		
LV11	HOTEL EVENT TERRACE		
LV 10	HOTEL - DINING	PLANT	
LV 09	OFFICE	PLANT	
LV 08	OFFICE - TYPE B		
LV 07	OFFICE - TYPE A		
LV 06	OFFICE - TYPE B		
LV 05	OFFICE - TYPE A		
LV 04	OFFICE - TYPE B		
LV 03	OFFICE - TYPE A		
LV 02	PLANT		
LV 01	PLANT		
LV MEZ	RETAIL	PLANT	
LV UG		O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE	RETAIL
LV LG	HOTEL ENTRANCE	PLANT	RETAIL
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LV B3	BASEMENT 3		
LV B4	BASEMENT 4		

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L31 GA RESI C

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-31-DR-A-P11031

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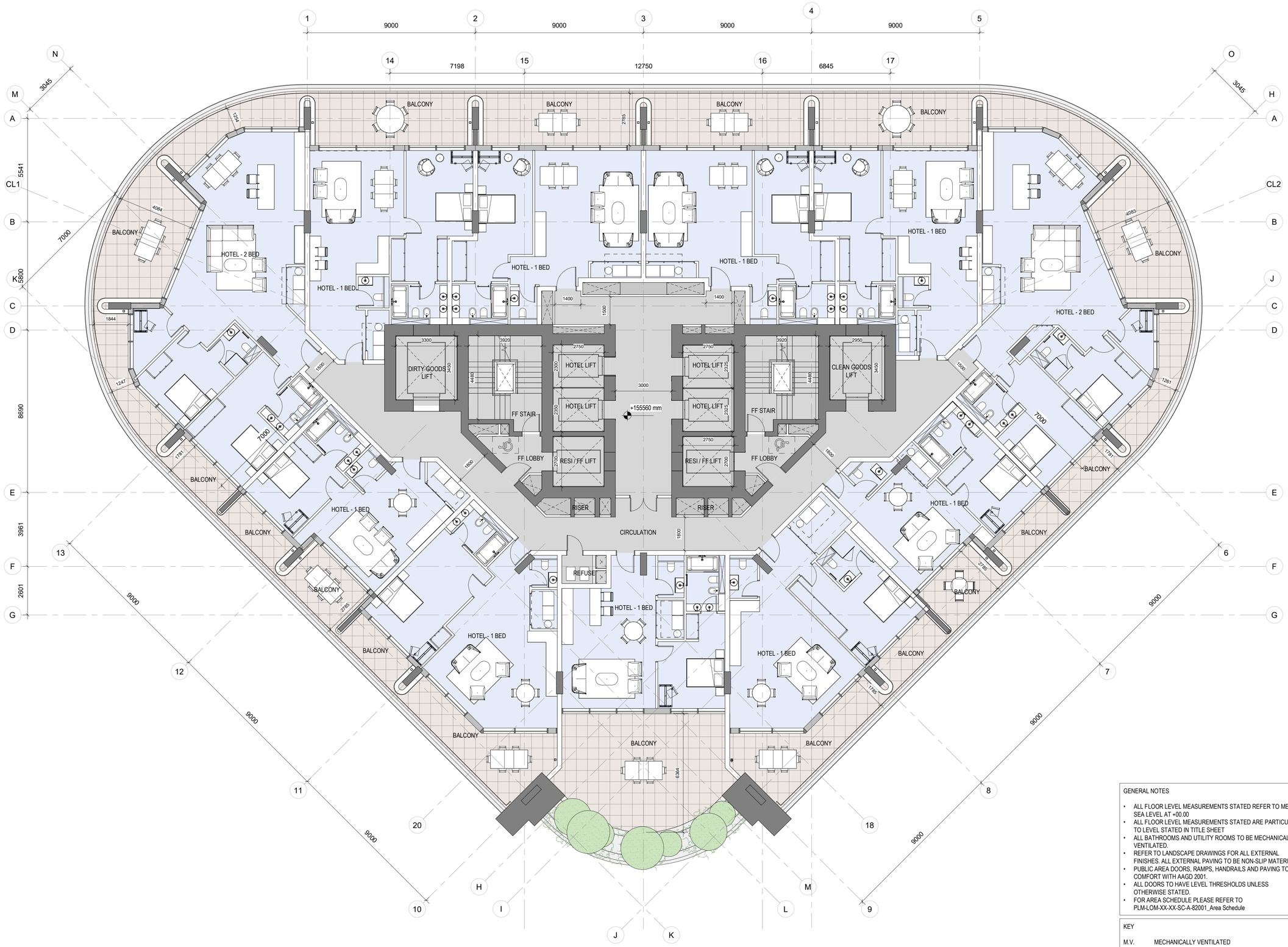

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P1	28.02.25	PLANNING ISSUE	JY	BT

LV 39	ROOF PLANT
LV 38	HOTEL - POOL
LV 37	PLANT
LV 36	HOTEL - RESTAURANT
LV 35	HOTEL - SERVICED APT
LV 34	HOTEL - SERVICED APT
LV 33	RESI - TYPE C
LV 32	RESI - TYPE A
LV 31	RESI - TYPE C
LV 30	RESI - TYPE A
LV 29	RESI - TYPE B
LV 28	RESI - TYPE A
LV 27	RESI - TYPE B
LV 26	RESI - TYPE A
LV 25	RESI - TYPE B
LV 24	RESI - TYPE A
LV 23	PLANT
LV 22	RESI/HOTEL AMENITY
LV 21	HOTEL - ACC D / PLANT
LV 20	HOTEL - ACC D / PLANT
LV 19	HOTEL - ACCTYPE A
LV 18	HOTEL - ACC TYPE B
LV 17	HOTEL - ACC TYPE A
LV 16	HOTEL - ACC TYPE B
LV 15	HOTEL - ACC TYPE A
LV 14	HOTEL - ACC TYPE B
LV 13	HOTEL - ACC TYPE C
LV 12	PLANT
LV11	HOTEL EVENT TERRACE
LV 10	HOTEL - DINING / PLANT
LV 09	OFFICE / PLANT
LV 08	OFFICE - TYPE B
LV 07	OFFICE - TYPE A
LV 06	OFFICE - TYPE B
LV 05	OFFICE - TYPE A
LV 04	OFFICE - TYPE B
LV 03	OFFICE - TYPE A
LV 02	PLANT
LV 01	PLANT
LV MEZ	RETAIL / PLANT
LV UG	O. RECEPT.
LV OG	RESI ENTRANCE / PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE / PLANT / RETAIL
LV B1	BASEMENT 1
LV B2	BASEMENT 2
LV B3	BASEMENT 3
LV B4	BASEMENT 4

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L34 GA SERV APTS

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-34-DR-A-P11034

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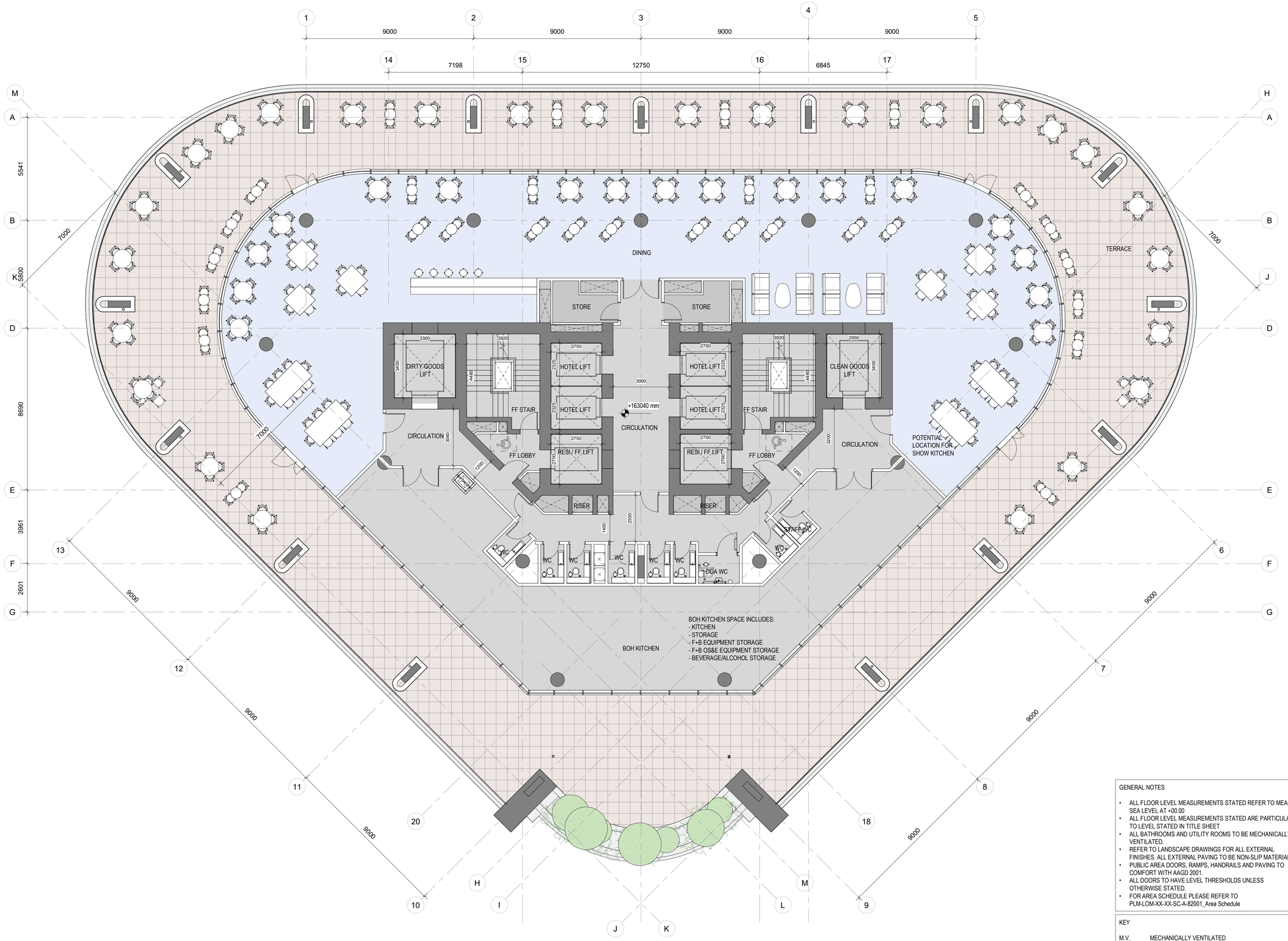

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT

LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
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LV 27	RESI - TYPE B	
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LV 20	HOTEL - ACC D	PLANT
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LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L36 GA PLAN HOTEL DESTINATION RESTAURANT

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-36-DR-A-P11036

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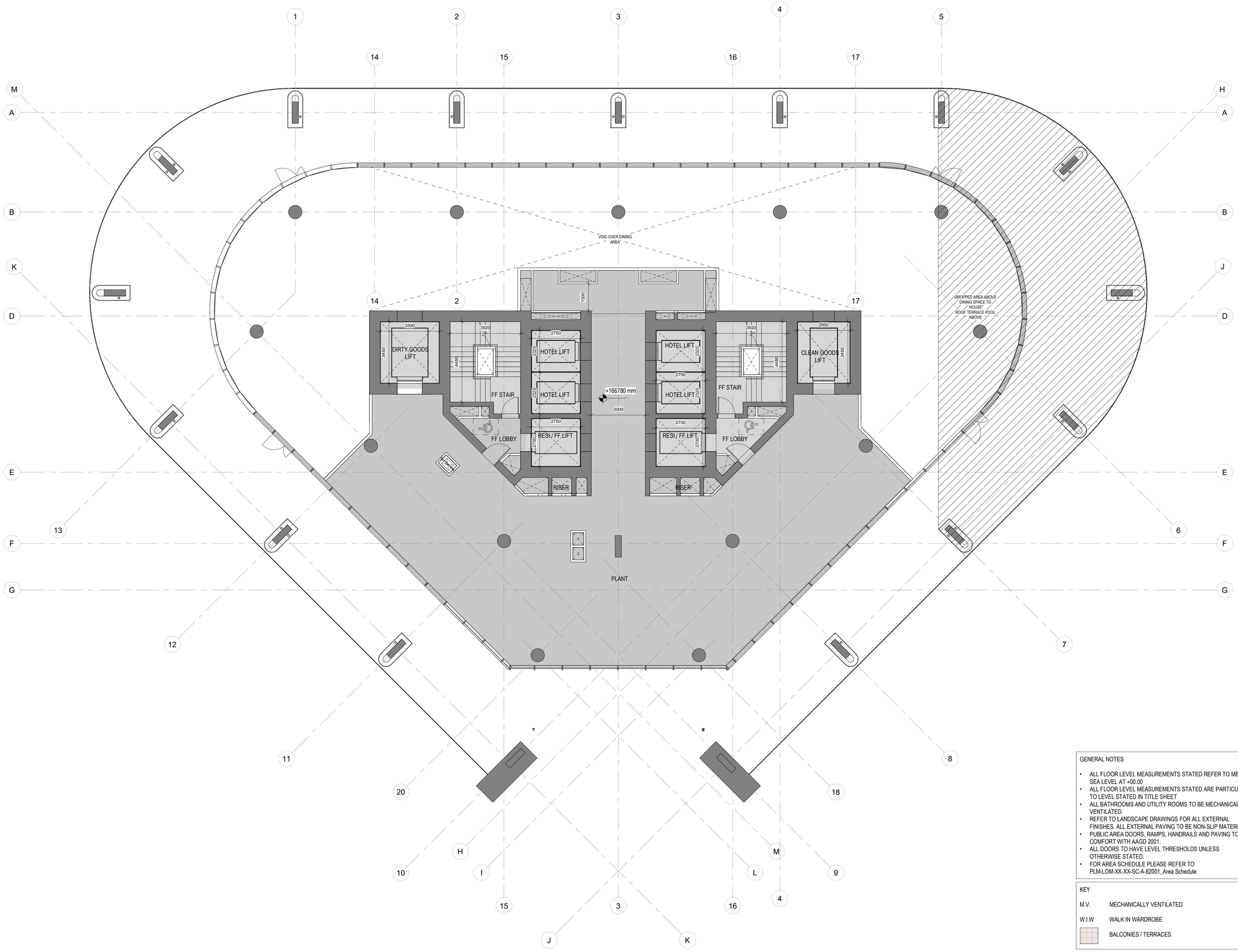

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P1	28.02.25	PLANNING ISSUE	MB	BT

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LV 20	HOTEL - ACC D	PLANT
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LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
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KEY

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W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L37 GA PLAN PLANT

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.: PLM-LOM-ZZ-37-DR-A-P11037

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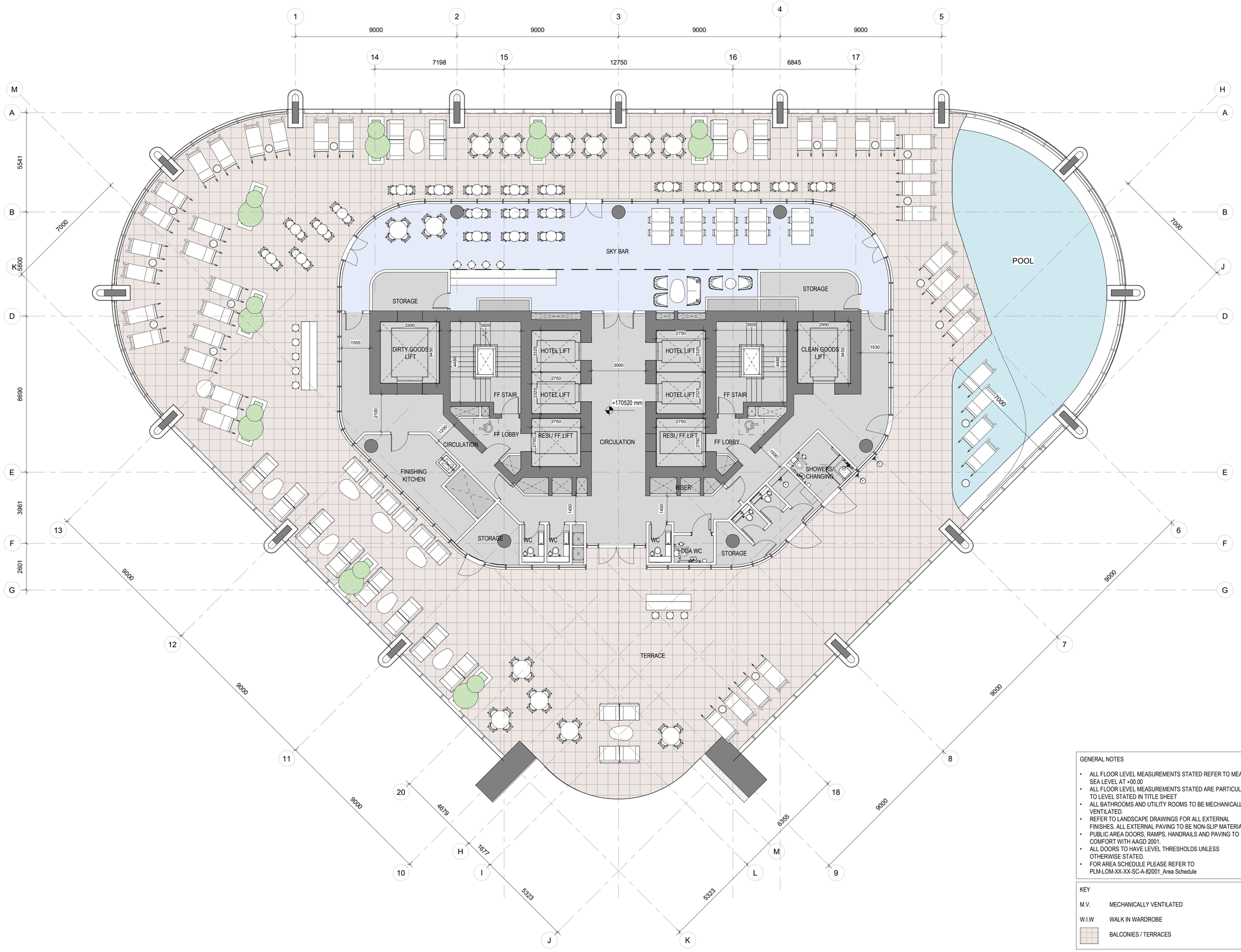

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LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
LV 08	OFFICE - TYPE B	
LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
LV B1	BASEMENT 1	
LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

GENERAL NOTES

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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

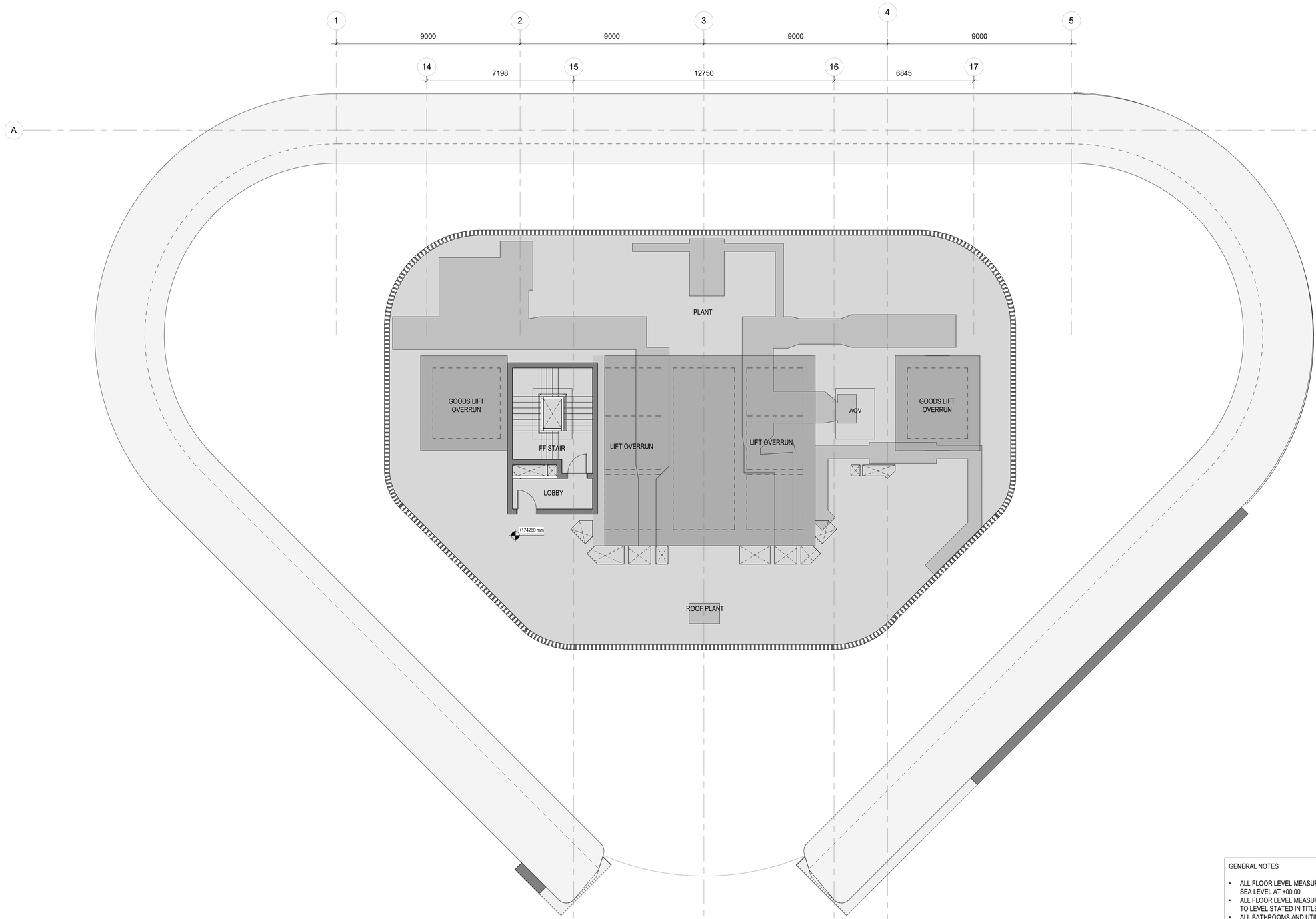
drawing title
L38 GA PLAN HOTEL POOL TERRACE

sheet size	scale	revision
A1	1:100@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM- LOM- ZZ- 38- DR- A- P11038

LOM architecture and design
The Glass House 5 Sclater Street London E1 6JY UK
Phone +44(0)20 8444 2999 **Email** mail@lom-fdp.com
Web www.lom-architecture.com



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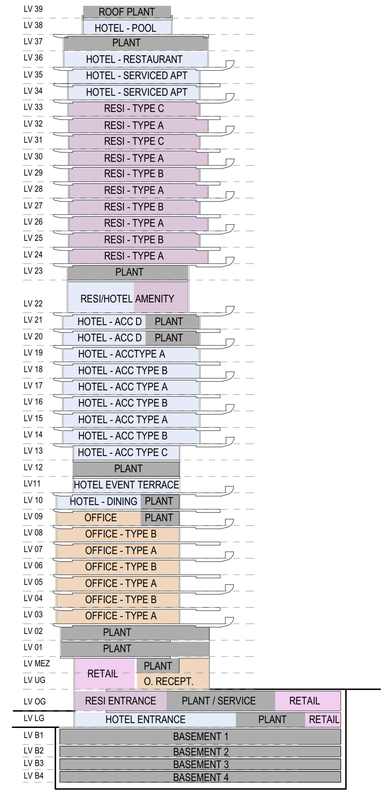
REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MB	BT



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KEY

M.V.	MECHANICALLY VENTILATED
W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

N

0 5 10 m

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
L39 GA PLAN ROOF PLANT

sheet size	scale	revision
A1	1:100@ A1	P1

status
PLANNING

approved by
BT

drawing no.
PLM-LOM-ZZ-39-DR-A-P11039

LOM architecture and design
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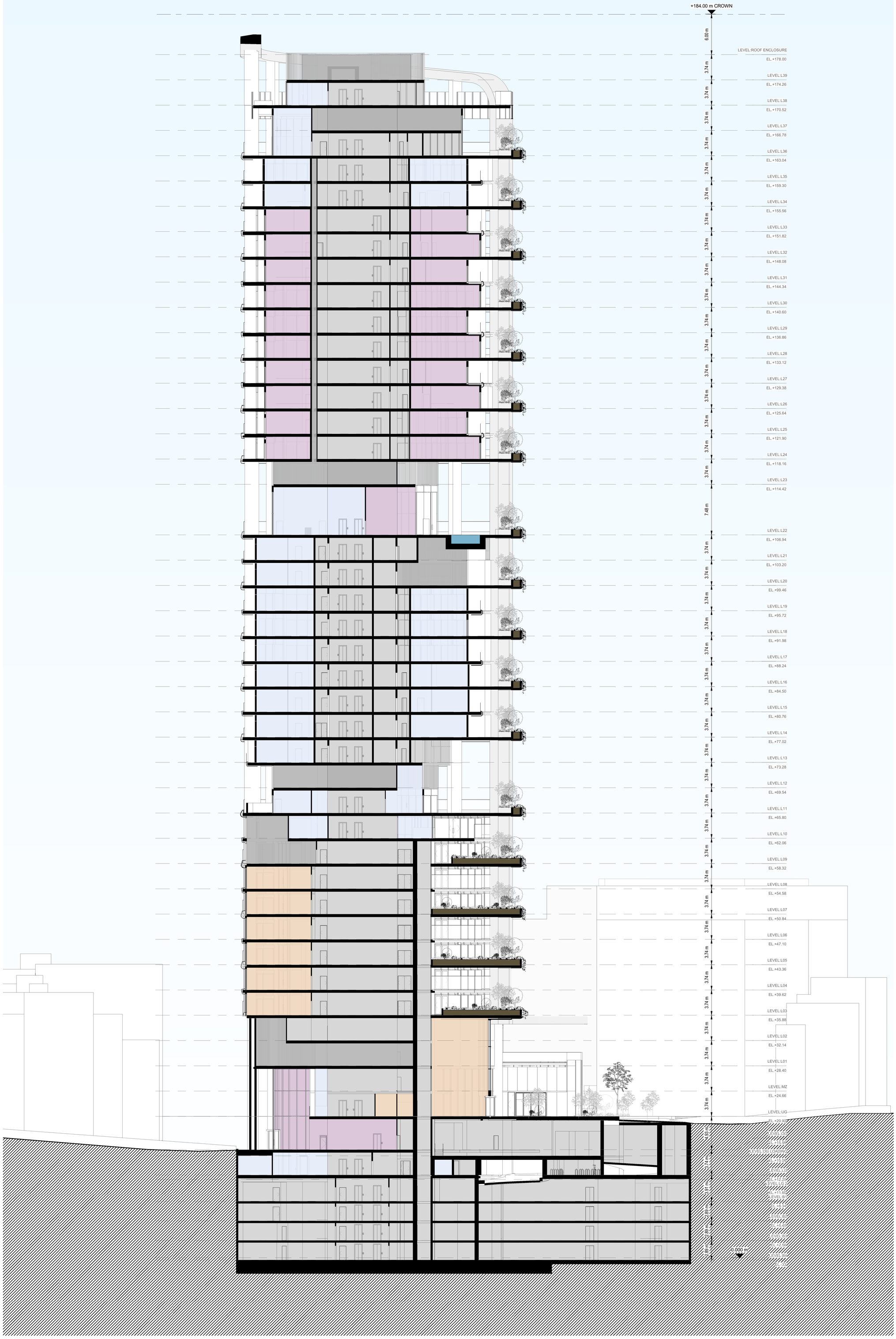
REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	07.03.25	PLANNING ISSUE	OC	BT



client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA
PLM

drawing title
SECTION AA

sheet size	scale	revision
A0	1:200 @ A0	P1

status	approved by
PLANNING	BT

drawing no.
PLM- LOM- ZZ- AA- DR- A- P22000

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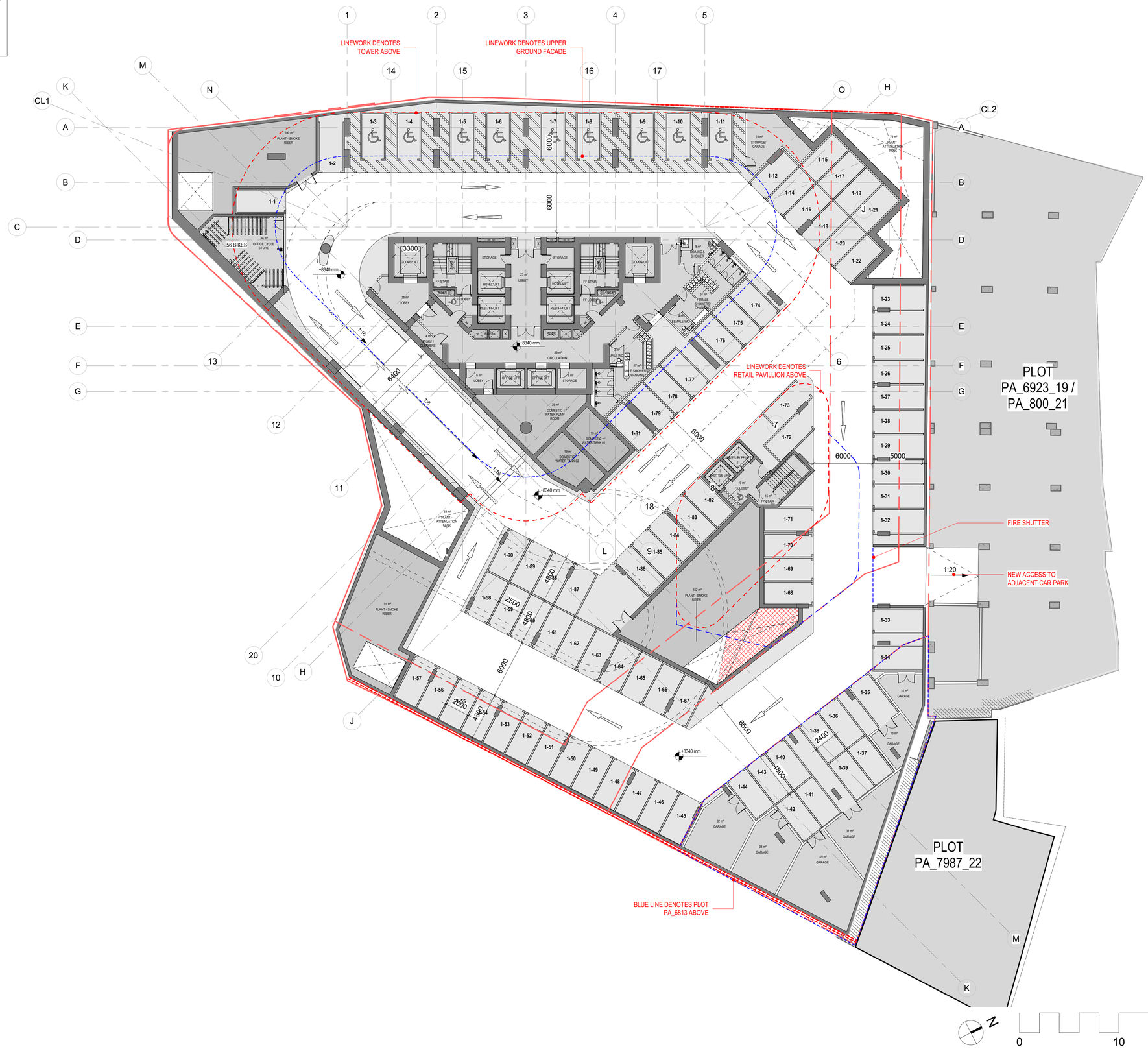
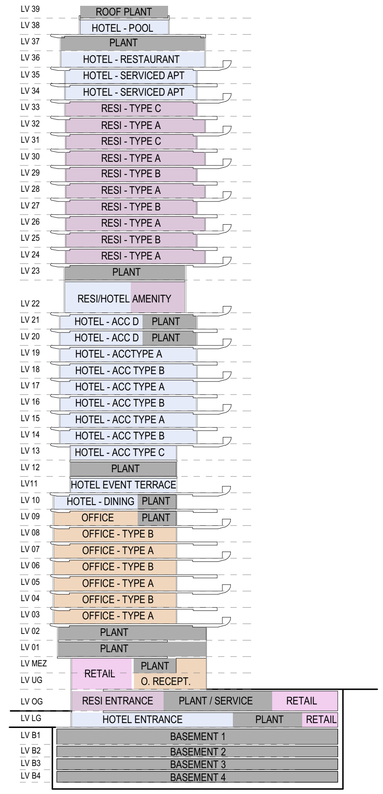


BASEMENT PARKING SCHEDULE	
SPACE TYPE	TOTAL
ACCESSIBLE SPACE	9
DOUBLE SPACE	16
STANDARD SPACE	63
Grand total: 88	88



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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	OC	BT

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
BASEMENT 01 GA PLAN (LB1)

sheet size A1 | scale 1:200@ A1 | revision P1

status PLANNING | approved by BT

drawing no.
PLM-LOM-ZZ-B1-DR-A-P10103

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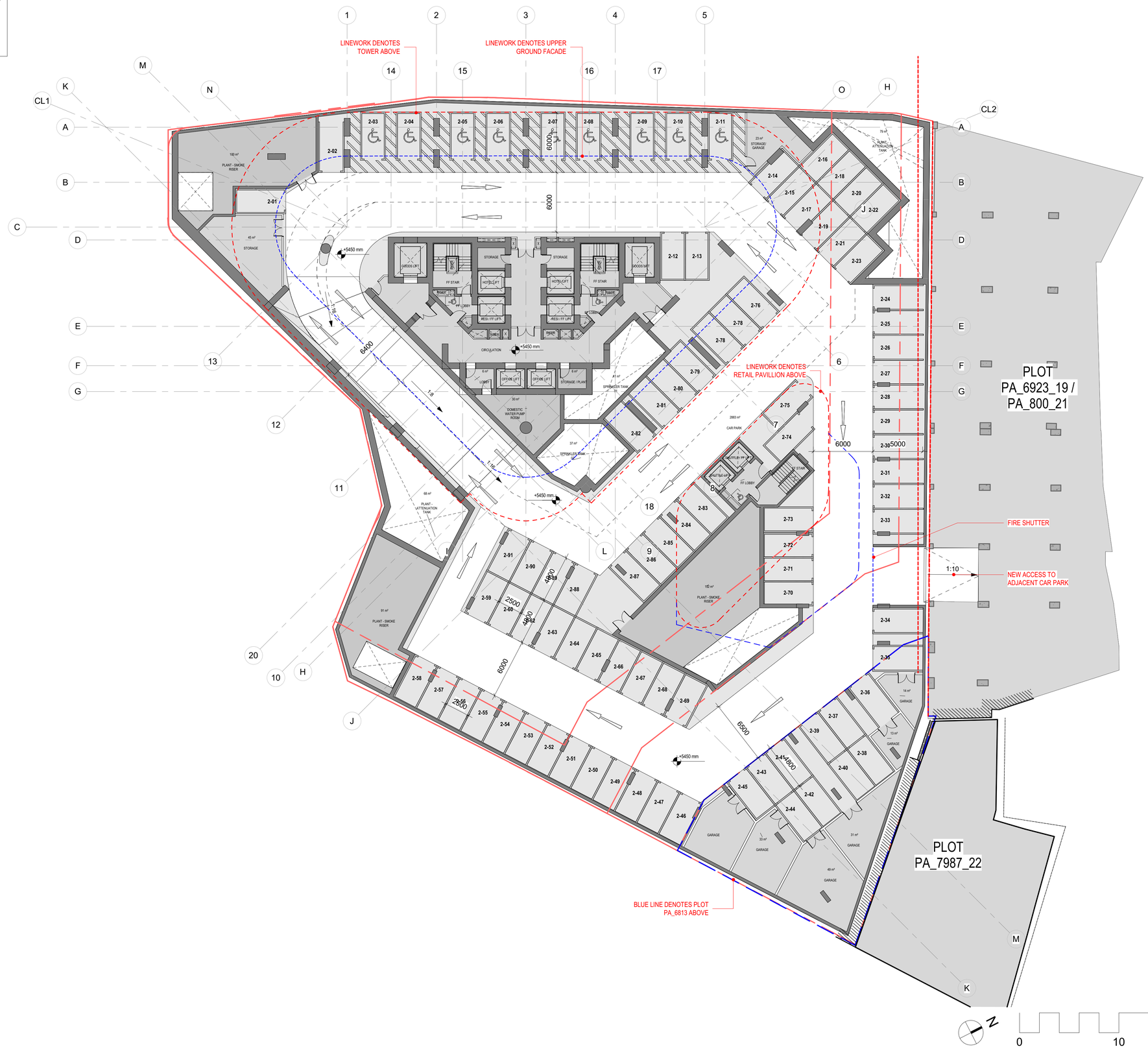
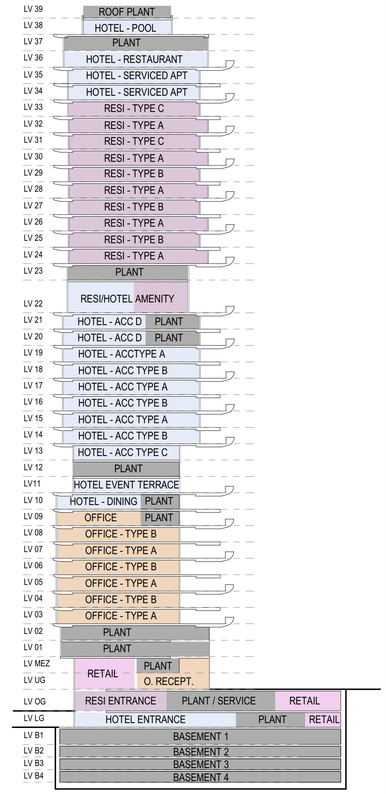


BASEMENT PARKING SCHEDULE	
SPACE TYPE	TOTAL
ACCESSIBLE SPACE	9
DOUBLE SPACE	16
STANDARD SPACE	65
Grand total: 90	90



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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	OC	BT

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
BASEMENT 02 GA PLAN (LB2)

sheet size	scale	revision
A1	1:200@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-B2-DR-A-P10104

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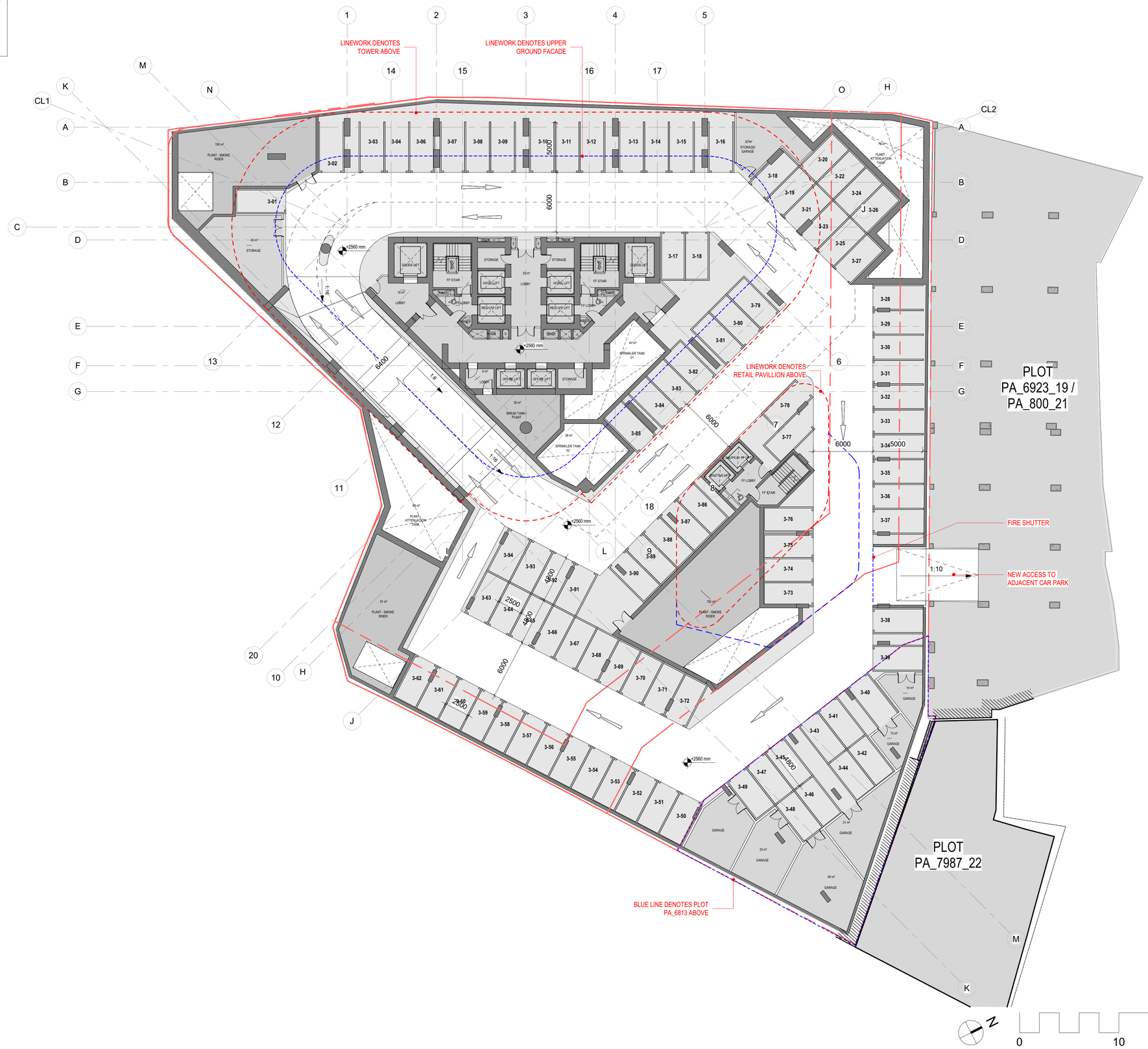
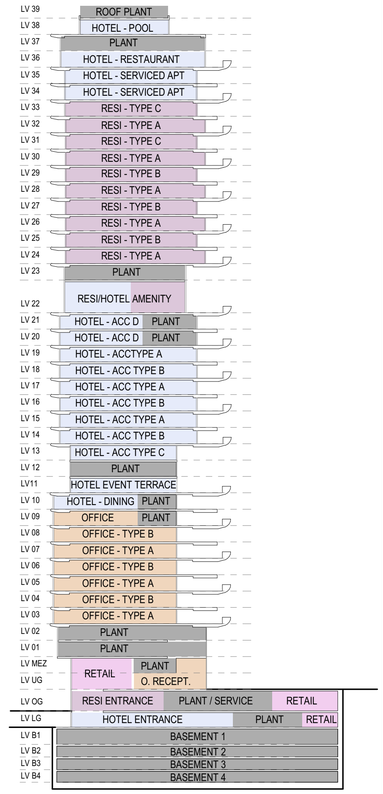


BASEMENT PARKING SCHEDULE	
SPACE TYPE	TOTAL
DOUBLE SPACE	16
STANDARD SPACE	78
Grand total: 94	94



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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	OC	BT

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
BASEMENT 03 GA PLAN (LB3)

sheet size: A1 | scale: 1:200@ A1 | revision: P1
status: PLANNING | approved by: BT
drawing no.: PLM-LOM-ZZ-B3-DR-A-P10105

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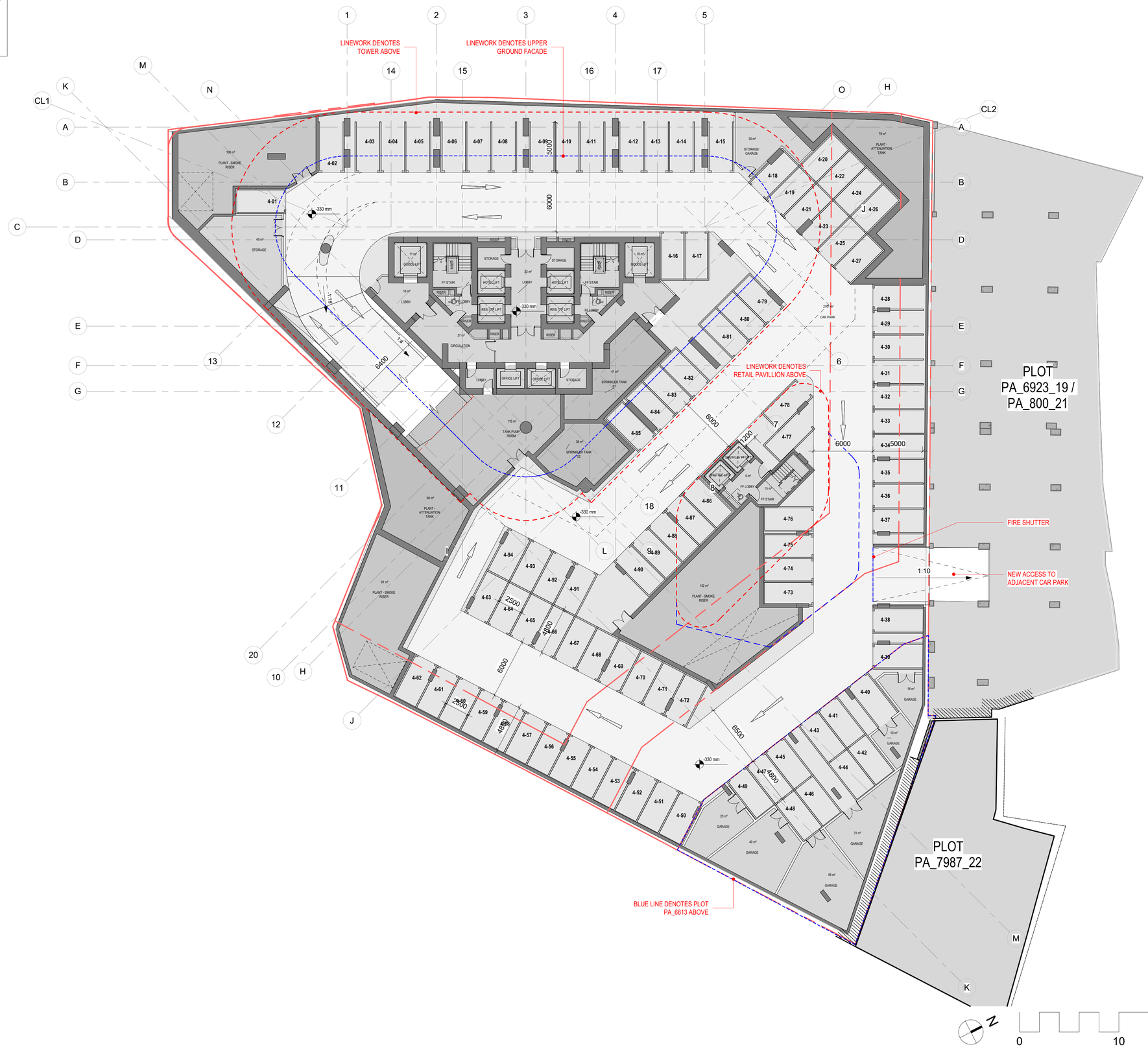

BASEMENT PARKING SCHEDULE	
SPACE TYPE	TOTAL
DOUBLE SPACE	16
STANDARD SPACE	78
Grand total: 94	94

USE OF DRAWINGS

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	OC	BT

LV 39	ROOF PLANT		
LV 38	HOTEL - POOL		
LV 37	PLANT		
LV 36	HOTEL - RESTAURANT		
LV 35	HOTEL - SERVICED APT		
LV 34	HOTEL - SERVICED APT		
LV 33	RESI - TYPE C		
LV 32	RESI - TYPE A		
LV 31	RESI - TYPE C		
LV 30	RESI - TYPE A		
LV 29	RESI - TYPE B		
LV 28	RESI - TYPE A		
LV 27	RESI - TYPE B		
LV 26	RESI - TYPE A		
LV 25	RESI - TYPE B		
LV 24	RESI - TYPE A		
LV 23	PLANT		
LV 22	RESI/HOTEL AMENITY		
LV 21	HOTEL - ACC D	PLANT	
LV 20	HOTEL - ACC D	PLANT	
LV 19	HOTEL - ACCTYPE A		
LV 18	HOTEL - ACC TYPE B		
LV 17	HOTEL - ACC TYPE A		
LV 16	HOTEL - ACC TYPE B		
LV 15	HOTEL - ACC TYPE A		
LV 14	HOTEL - ACC TYPE B		
LV 13	HOTEL - ACC TYPE C		
LV 12	PLANT		
LV11	HOTEL EVENT TERRACE		
LV 10	HOTEL - DINING	PLANT	
LV 09	OFFICE	PLANT	
LV 08	OFFICE - TYPE B		
LV 07	OFFICE - TYPE A		
LV 06	OFFICE - TYPE B		
LV 05	OFFICE - TYPE A		
LV 04	OFFICE - TYPE B		
LV 03	OFFICE - TYPE A		
LV 02	PLANT		
LV 01	PLANT		
LV MEZ	RETAIL	PLANT	
LV UG		O. RECEPT.	
LV OG	RESI ENTRANCE	PLANT / SERVICE	RETAIL
LV LG	HOTEL ENTRANCE	PLANT	RETAIL
LV B1	BASEMENT 1		
LV B2	BASEMENT 2		
LV B3	BASEMENT 3		
LV B4	BASEMENT 4		

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
BASEMENT 04 GA PLAN (LB4)

sheet size	scale	revision
A1	1:200@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-B4-DR-A-P10106

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Phone +44(0)20 8444 2999 **Email** mail@lom-fdp.com
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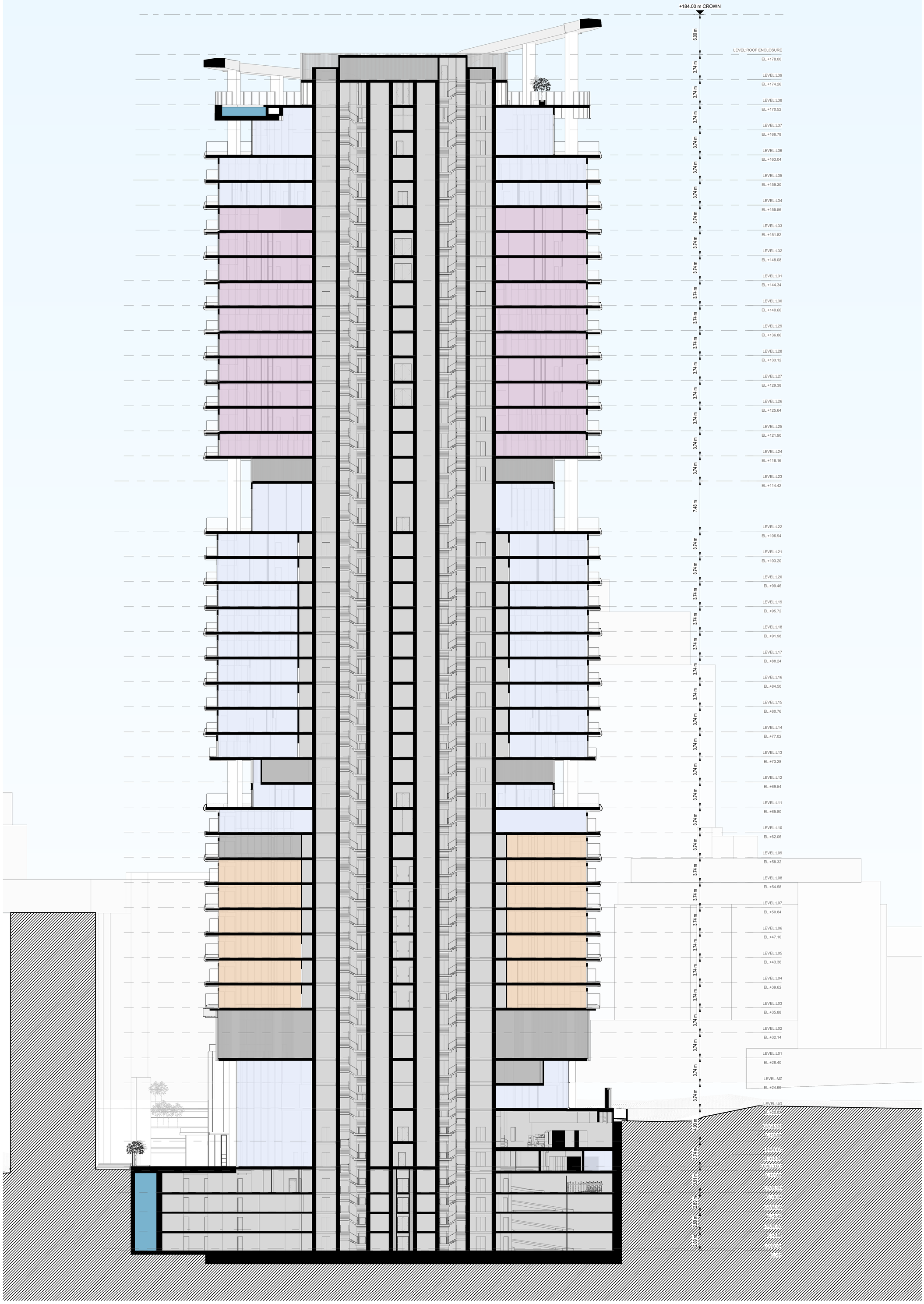

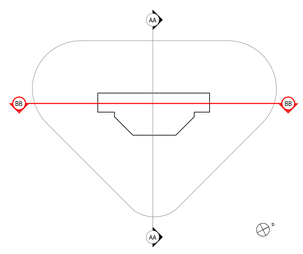

ROOM USE KEY:

- HOTEL
- RESIDENTIAL
- OFFICE
- RETAIL / F&B / CLASS 4D USE
- CIRCULATION / BOH / CAR PARK
- PLANT

USE OF DRAWINGS

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	07.03.25	PLANNING ISSUE	OC	BT

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA
PLM

drawing title
SECTION BB

sheet size	scale	revision
A0	1:200 @ A0	P1

status: PLANNING
approved by: BT

drawing no.
PLM- LOM- ZZ- BB- DR- A- P22001

LOM architecture and design
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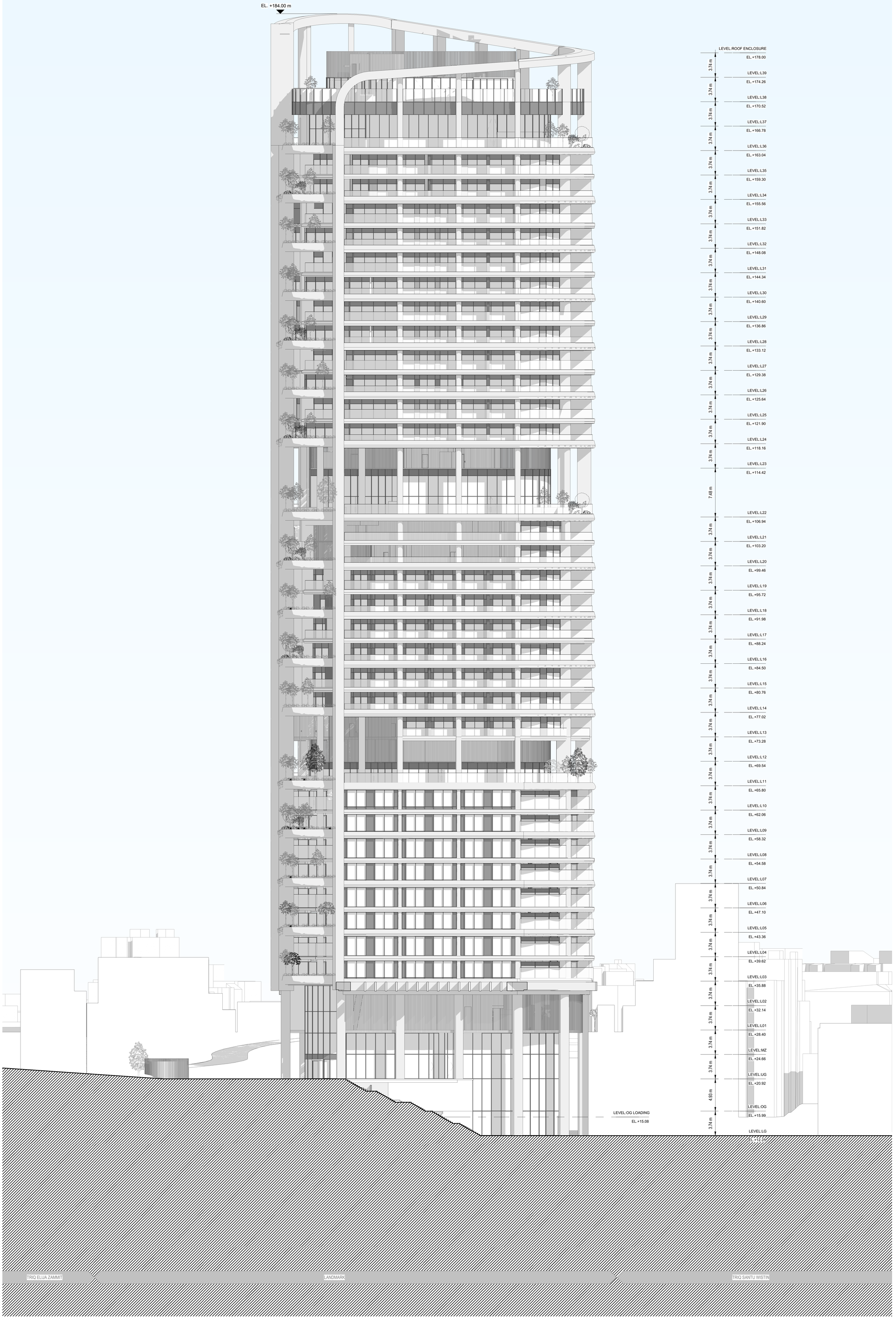
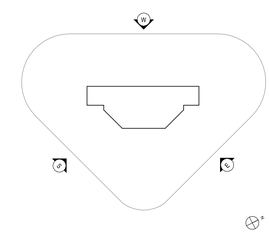
REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	07.03.2025	PLANNING ISSUE	JY	BT





LOM

client
PROJECT LANDMARK CONTRACTING LIMITED

project
PROJECT LANDMARK, PACEVILLE, MALTA
PLM

drawing title
EAST ELEVATION

sheet size	scale	revision
A0	1:200	P1

status	approved by
PLANNING	BT

drawing no.
PLM- LOM- ZZ- EA- DR- A- P21002

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- FOR AREA SCHEDULE PLEASE REFER TO PLM-LOM-XX-XX-SC-A-82001_Area Schedule

KEY

M.V. MECHANICALLY VENTILATED

W.I.W WALK IN WARDROBE

BALCONIES / TERRACES

ROOM USE KEY:

- HOTEL
- RESIDENTIAL
- OFFICE
- RETAIL / F&B / CLASS 4D USE
- CIRCULATION / BOH
- PLANT

USE OF DRAWINGS

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REVISIONS

REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MR	BT

LV 39	ROOF PLANT	
LV 38	HOTEL - POOL	
LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
LV 23	PLANT	
LV 22	RESI/HOTEL AMENITY	
LV 21	HOTEL - ACC D	PLANT
LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
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LV 04	OFFICE - TYPE B	
LV 03	OFFICE - TYPE A	
LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
LV B1	BASEMENT 1	
LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

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PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
LOWER GROUND GA (LG)

sheet size	scale	revision
A1	1:200@ A1	P1

status: PLANNING
approved by: BT

drawing no.
PLM-LOM-ZZ-LG-DR-A-P10102

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W.I.W	WALK IN WARDROBE
	BALCONIES / TERRACES

ROOM USE KEY:

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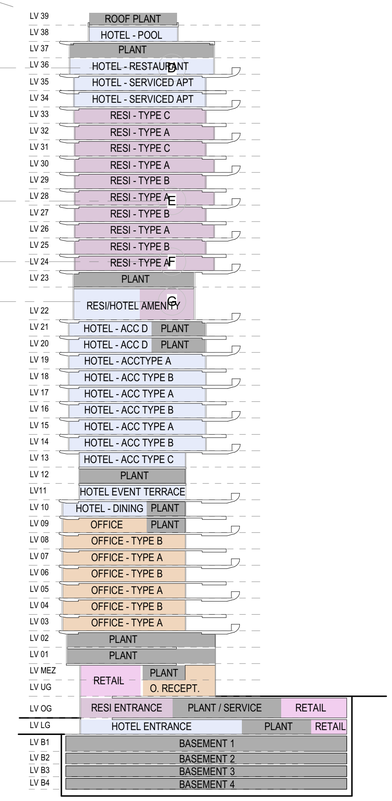
- RETAIL / F&B / CLASS 4D USE
- CIRCULATION / BOH
- PLANT



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REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	28.02.25	PLANNING ISSUE	MR	BT

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project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
GROUND FLOOR GA (OG)

sheet size	scale	revision
A1	1:200@ A1	P1

status
PLANNING

approved by
BT

drawing no.
PLM-LOM-ZZ-OG-DR-A-P10101

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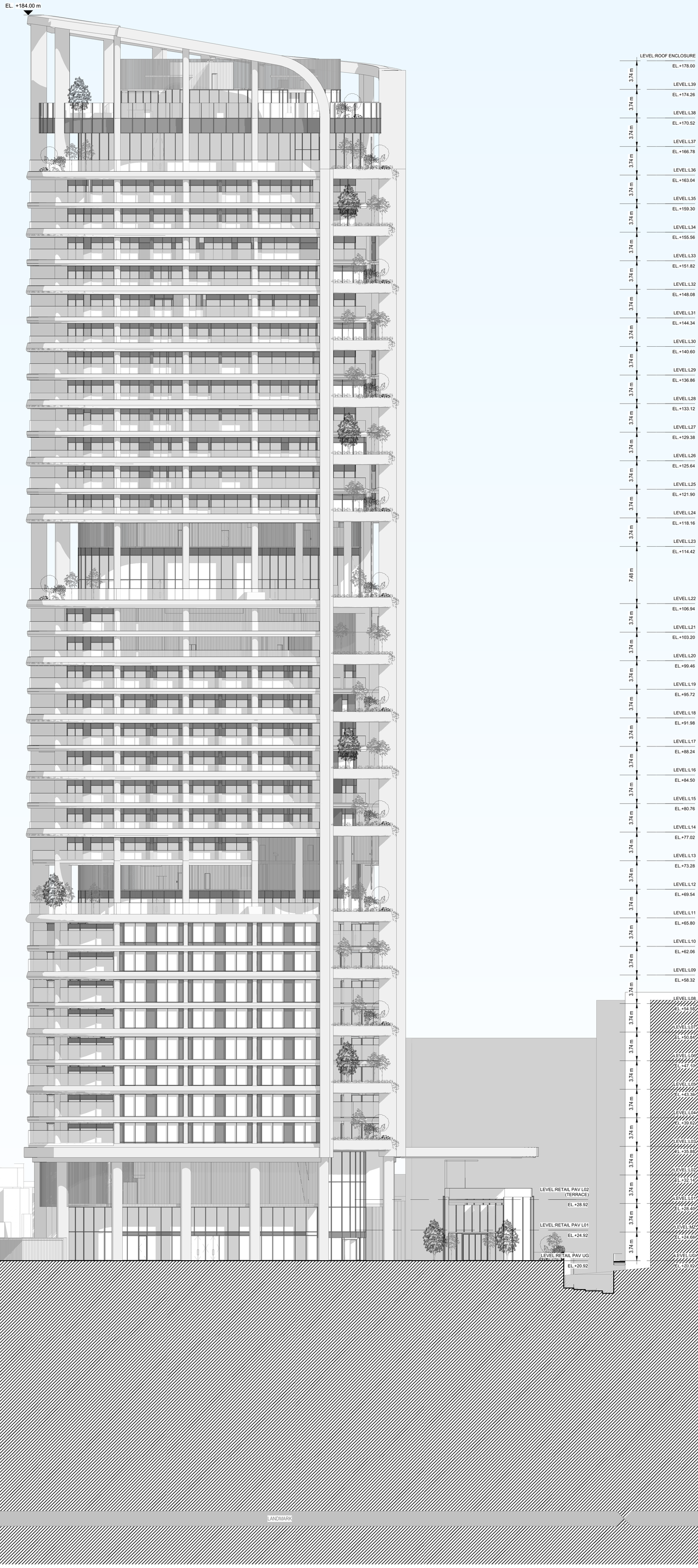
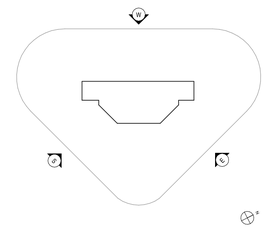
REV	DATE	DESCRIPTION	DRAWN	CHECKED
P1	07.03.2025	PLANNING ISSUE	MB	BT





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PLM

drawing title
SOUTH ELEVATION

sheet size	scale	revision
A0	1:200	P1

status	approved by
PLANNING	Approver

drawing no.
PLM- LOM- ZZ- SO-DR- A- P21003

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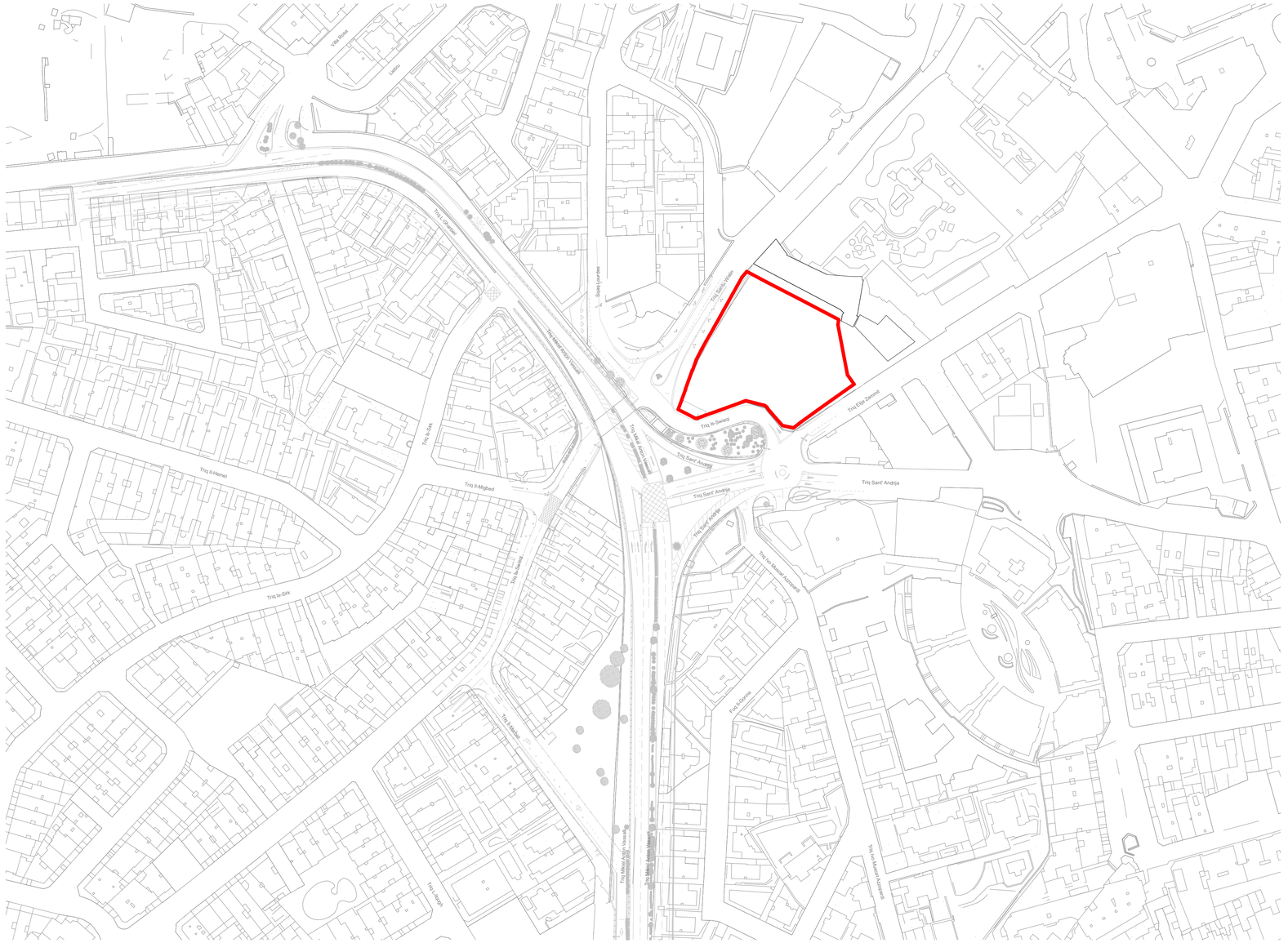
Triq Sant' Andrija
Triq Sant' Andrija
Triq Sant' Andrija

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Triq Mikel Anton Vassa

Triq Sant'Andrija

Triq Is-Swieqi

Triq Santu Wistin

Triq Elija Zammit

TO BE DEMOLISHED

Sushi Bar

UIC

3 m

7 m

7m

8m

15m

PLOT
PA_6923_19 /
PA_800_21

PLOT
PA_6813_20

PLOT
PA_7987_22

Buildable Area
2984 m²

Developable Area
3669 m²

Site Boundary
4116 m²

EXISTING SITE KEY
- SITE OWNERSHIP BOUNDARY
- SITE DEVELOPABLE AREA SET BACK
- SITE BUILDABLE AREA SET BACK
- PROPOSED DEMOLITION
- +00.00 EXISTING SPOT LEVELS

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project
PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
EXISTING SITE PLAN

sheet size	scale	revision
A1	1:200@ A1	P1

status: PLANNING
approved by: BT

drawing no.: PLM-LOM-ZZ-UG-DR-A-P00100

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W.I.W WALK IN WARDROBE

BALCONIES / TERRACES

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- PLANT

Triq Santu Wistin

Triq Is-Sweiqi

Triq Gort

Triq Elija Zammit

INTAKE LOUVRES WITHIN PLANTER

CAR PARK VENT TOWER

VOID OVER UG RESI RECEPTION

VOID OVER LG HOTEL RECEPTION

VOID OVER OG RETAIL

ZONE FOR BOH KITCHEN

RECEPTION OFFICE

OFFICE RECEPTION

LOBBY

LIFT LOBBY

RISER CUPBOARD

STORE

NOTE: LANDSCAPE SHOWN INDICATIVLEY. REFER TO LANDSCAPE PLANS FOR DETAILS

FUELING

PROPOSED DROP OFF

BUILDABLE AREA
2984 m²

DEVELOPABLE AREA
3668 m²

SITE AREA
4115 m²

PLOT
PA_6923_19 /
PA_800_21

PLOT
PA_6813_20

PLOT
PA_7987_22

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LV 37	PLANT	
LV 36	HOTEL - RESTAURANT	
LV 35	HOTEL - SERVICED APT	
LV 34	HOTEL - SERVICED APT	
LV 33	RESI - TYPE C	
LV 32	RESI - TYPE A	
LV 31	RESI - TYPE C	
LV 30	RESI - TYPE A	
LV 29	RESI - TYPE B	
LV 28	RESI - TYPE A	
LV 27	RESI - TYPE B	
LV 26	RESI - TYPE A	
LV 25	RESI - TYPE B	
LV 24	RESI - TYPE A	
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LV 20	HOTEL - ACC D	PLANT
LV 19	HOTEL - ACCTYPE A	
LV 18	HOTEL - ACC TYPE B	
LV 17	HOTEL - ACC TYPE A	
LV 16	HOTEL - ACC TYPE B	
LV 15	HOTEL - ACC TYPE A	
LV 14	HOTEL - ACC TYPE B	
LV 13	HOTEL - ACC TYPE C	
LV 12	PLANT	
LV11	HOTEL EVENT TERRACE	
LV 10	HOTEL - DINING	PLANT
LV 09	OFFICE	PLANT
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LV 07	OFFICE - TYPE A	
LV 06	OFFICE - TYPE B	
LV 05	OFFICE - TYPE A	
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LV 02	PLANT	
LV 01	PLANT	
LV MEZ	RETAIL	PLANT
LV UG		O. RECEPT.
LV OG	RESI ENTRANCE	PLANT / SERVICE / RETAIL
LV LG	HOTEL ENTRANCE	PLANT / RETAIL
LV B1	BASEMENT 1	
LV B2	BASEMENT 2	
LV B3	BASEMENT 3	
LV B4	BASEMENT 4	

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PROJECT LANDMARK, PACEVILLE, MALTA

project number
PLM

drawing title
UPPER GROUND GA (UG)

sheet size	scale	revision
A1	1:200@ A1	P1

status
PLANNING

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BT

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PLM-LOM-ZZ-UG-DR-A-P10100

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Annex B – Traffic AADT

Technical Memorandum: Traffic Impact Assessment – Methodology, Assumptions, and Responses to Review Concerns

Project: *PA4313/25 – Construction of a Mixed Use 40-Storey Tower (Triq Elija Zammit) Making Use of FAR Policy for Tall Buildings*

(Following the findings already approved in PA/02470/16 and PA/06097/20)

Author: Bjorn Bonello
(Spatial Planner / Traffic Analyst), B.Sc. (Hons) Environmental Planning (Birmingham, UK)

Date: August/September 2025

This Technical Memorandum was originally prepared in relation to the previously approved development applications PA/02470/16 and PA/06097/20, which concerned a mixed-use high-rise project at Triq Santu Wistin / Triq Elija Zammit, Paceville.

In light of the new proposal PA4313/25, titled *"Construction of a mixed use 40-storey tower (Triq Elija Zammit) making use of FAR policy for tall buildings"*, this document is hereby reissued to provide technical continuity and context.

The new proposal will include four basement levels comprising car parking, storage, plant areas, and water reservoirs. The tower will consist of the following mix of uses: Class 1 residential apartments, Class 3B hotel (hotel rooms and serviced apartments) including hotel amenities (pool areas, restaurants, event halls and rooftop bar), Class 4A offices, Class 4B retail, Class 4C & 4D food and beverage outlets, and dedicated technical service spaces distributed across the tower.

At ground level, the scheme features an open piazza with hard and soft landscaping, a retail and F&B pavilion directly connected with the basement levels, public seating, ventilation vents, and tables and chairs associated

with the F&B units. This proposal consolidates and extends the site area covered by the earlier permits, thereby creating a comprehensive and integrated development scheme.

The analytical framework, datasets, and findings presented in this memorandum remain directly relevant and continue to inform the understanding of traffic conditions and methodological robustness in the context of the latest proposal.

Introduction

This memorandum provides a comprehensive review of the traffic analysis undertaken for the proposed mixed-use development in Paceville (*PA4313/25 - Following the findings already approved in PA/02470/16 and PA/06097/20*). It addresses specific concerns raised regarding the derivation of Annual Average Daily Traffic (AADT) figures and defends the methodology and assumptions used. The report was presented—at various levels—to technical experts and Planning Commissions/ERA/Transport Malta, and it ultimately supported the project's approval. Traffic impact was recognised as the principal risk given the site's proximity to an already congested network, beyond-capacity junctions, and recent approvals of similar schemes that attracted public attention. Accordingly, the TIA became the pivotal submission whose conclusions would effectively make or break the proposal. Following extensive discussions with Transport Malta (TM) ERA and the Planning Authority (PA), and thanks to robust analysis and targeted design revisions, consensus was reached and the project proceeded to approval.

The goal is twofold: (1) to explain how AADT and trip generation were determined, and (2) to demonstrate the robustness and integrity of the analysis, including data collection, modal split assumptions, linked-trip rationale, and consideration of third-party developments. All conclusions are supported by empirical data collected on-site and by established best practices and guidelines. The approach aligns with local planning policy objectives to concentrate development in areas well-served by transport and to promote sustainable travel modes.

Project context

The site lies in the heart of Paceville—Malta's prime entertainment and tourism district—and will comprise a high-rise mix of offices, a hotel (with serviced apartments), residential units, and ancillary commercial areas,

supported by on-site parking. Paceville's streets are characterised by dense nightlife, hospitality venues, and day-time commercial activity. Crucially, the area has unique travel characteristics: heavy pedestrian traffic, high public transport use, and a prevalence of multi-purpose visits (the same visitor engaging in several activities within a single outing). These factors informed the traffic impact methodology, ensuring that standard trip generation figures were adjusted to reflect local reality. For consistency and parity of treatment, we also reviewed comparable schemes previously accepted by the authorities and retained methodologies/inputs accepted for similar land uses and contexts, unless materially different circumstances were demonstrated.

Executive summary (headline findings) - PA4313/25

Net new primary peak-hour trips (revised mix: 189 hotel rooms; 68 residential units; 8,130 m² offices):

- AM ≈ 100 veh/h
- PM ≈ 83 veh/h

AADT conversion using your dataset-based K assumption (combined AM+PM share of daily = 20–24%, with PM = 16.8% of AADT):

- 20% → ≈ 915 veh/day;
- 22% ≈ 830 veh/day;
- 24% → ≈ 763 veh/day.

Reported range and point estimate for **new primary AADT**: **~760–915 veh/day**, central value **≈ 830 veh/day** (at 22%).

Baseline AADT on Triq Santu Wistin (context): ≈ 16,700 veh/day (factored from observed peaks and historic counts).

Conclusion: The development's (PA4313/25) **new primary** daily traffic represents a **modest increment** of a busy urban corridor and is assessed conservatively (e.g., taxis/e-hailing counted as primary; per-land-use linked-trip treatment; cautious modal shares).

1) Data collection and AADT derivation

Extensive traffic surveys. Over several months, we undertook counts at key junctions and links in and around Paceville (e.g., Triq Santu Wistin, Triq il-Mediterran, Triq Elija Zammit, Triq Gort), covering weekday peaks, inter-peaks and weekends. Additional evidence included on-street parking/occupancy surveys, journey time runs, pedestrian counts, and staff/tenant questionnaires for nearby office buildings. Surveys were repeated or extended to avoid one-off snapshots and to capture day-to-day variability; anomalous events were screened out.

Baseline AADT estimation. Peak-period counts were expanded to daily estimates using observed local profiles and factor sets appropriate for mixed commercial/tourism areas, checking against historic counts (e.g., 2018/2019) for plausibility and stability. This produced an order-of-magnitude **baseline AADT ≈ 16,700 veh/day** for Triq Santu Wistin—the principal access route. Importantly, inflows/outflows are often gated by the Regional Road junction (Triq Mikiel Anton Vassalli), creating queues at the periphery and moderating internal link volumes during peak times.

2) Trip rates and sources (consistency with the approved TIA)
To maintain methodological consistency and parity of treatment, we retained the land-use trip rates previously adopted and accepted in the TIA:

- **Residential:** 0.13 AM; 0.15 PM trips per unit.

- **Hotel/serviced:** 0.28 AM; 0.16 PM trips per room.
- **Offices:** 2.27 AM; 2.00 PM trips per 100 m^2.

These rates were previously reviewed by the Authorities and described as conservative and satisfactory for the local context. While alternative datasets could yield higher generation, the principle applied throughout has been consistent like-for-like comparison across approvals namely PA 1892/19, PA3807/17 and PA2478/16.

3) Modal split (local evidence and conservative treatment)

Paceville is exceptionally well served by non-car modes, owning also to the high presence of non-Maltese residents/employees/commuters and tourists. Public transport usage is among the highest nationally, and walking is common due to short trip lengths and dense clustering of attractions. Building on local surveys and observations, the TIA adopted **conservative** mode shares that we retain here:

- **Offices:** ≥30% non-car (c.20% bus + 10% walk).
- **Hotel/serviced:** 60% bus + 15% walk + 25% car (including taxi/e-hailing).

Treatment of taxis/e-hailing as primary. For the revised assessment, and to avoid any suggestion of underestimation, taxis and app-based e-hailing are explicitly counted as primary car trips across land uses. This reflects post-COVID mobility patterns and matches the TIA convention that "car" includes taxi services. It is a **deliberately robust** stance.

4) Linked / non-primary trips and internal capture (method and rationale)

Paceville exhibits high rates of **linked trips** ("park once, visit many"), especially evenings/weekends, and a proportion of trips is **already present on the network** for other purposes. The approved TIA reduced gross peaks to net **new primary** peaks by accounting for:

- pass-by/linked activity;
- trips already on the network serving multiple destinations; and
- internal capture across the mixed uses.

For the revision, as directed, we apply per-land-use linked/non-primary adjustments, rather than a single aggregate factor. These respects differing profiles between residential, hotel and office components and avoids double counting reductions.

5) Seasonality (acknowledged; already reflected in assumptions)

Summer uplift is material in Paceville, with a high share of young tourists and language students. Crucially, much of this demand is met by organised transport, bus services and taxis, already reflected in our conservative modal split and in the explicit inclusion of taxi/e-hailing as primary. Because **AADT is an annual average**, summer peaks are smoothed against quieter periods; nevertheless, our treatment remains conservative for peak design considerations.

6) Numbers and AADT conversion (K/D factor)

Definition (for clarity). In highway practice, the **K** factor represents the proportion of daily two-way flow occurring in a defined peak hour (or, as used here, the combined AM+PM peak hours). **D** is the directional distribution of the peak flow; D informs link/junction design but is not

needed to convert two-way peak totals into AADT. In this submission, **K is the combined AM+PM share of daily AADT** derived from local datasets.

Our datasets indicate **PM ≈ 16.8% of AADT**, and **combined AM+PM ≈ 20–24%** of AADT—reasonable for a dense urban/tourism cluster.

Net new primary peak-hour totals (revised quantum; rounded):

- **AM: ≈ 100 veh/h** • **PM: ≈ 83 veh/h**

AADT conversion using combined AM+PM share:

$$\mathrm{AADT}_{\mathrm{new}} = \frac{\mathrm{AM}_{\mathrm{net}} + \mathrm{PM}_{\mathrm{net}}}{p} = \frac{100 + 83}{p}$$

- If p = 0.24 → **≈ 763 veh/day**
- If p = 0.22 (central) → **≈ 830 veh/day**
- If p = 0.20 → **≈ 915 veh/day**

Reported AADT (new primary): ~760–915 veh/day, with a median estimate **≈ 830 veh/day** at 22%.

This sits squarely within the previously indicated **750–890** range and is anchored in the TIA's trip-rate sources, conservative modal splits, and per-land-use linked/non-primary treatment.

7) Cumulative development, future scenarios, and mitigation

The assessment incorporated **future horizon years** (opening year and +5 years), "with" and "without" development, and **cumulative third-party developments** in St Julian's/Paceville already in the pipeline. We also considered Infrastructure Malta road improvements (e.g., key junction upgrades and new links). With upgrades operational, entry-point congestion is eased for all users; without upgrades, the proposal's increment remains marginal relative to baseline volumes, with the main bottleneck (Regional Road) being a pre-existing systemic constraint identified long before this proposal. The project's design mitigations—adequate on-site parking to minimise cruising, improved pedestrian permeability (link between Triq Santu Wistin and Triq Elija Zammit), high-quality cycle facilities, real-time PT information, and a Green Travel Plan—further support mode shift and dispersion of peak demand. Mixed-use temporal complementarity (office daytime vs hospitality evening) improves parking turnover and reduces cumulative peaks.

8) Policy compliance and best-practice alignment
Local policy.

The North Harbours Local Plan and FAR policy direct major growth to accessible, transit-served hubs like Paceville, where sustainable modes can absorb a larger share of trips. Requirements for Green Travel Plans, parking management, and pedestrian improvements are met and embedded within the proposal.

International practice

Our methodology follows recognised standards: site-specific travel surveys (UK DfT practice), treatment of internal capture/linked and pass-by trips (ITE Trip Generation Handbook/TRB), and conservative mode shares suited to a town-centre location. Benchmarks from European city-centre office schemes (often sub-50% car mode share) reinforce the appropriateness of our assumptions. Contemporary trends (teleworking, shared mobility) provide further downward pressure on long-term car demand; we did not rely on them for reductions, maintaining a conservative stance.

Conclusion

The traffic assessment for PA 6097/20 is sound, data-driven, and conservative. The methodology is transparent, replicable, and consistent with prior approvals and best practice. For the new proposal in PA4313/25 there will be ≈ 760–915 new primary veh/day (median ≈ 830), the development's daily impact is a modest increment on a corridor carrying ≈ 16,700 veh/day, and peak-hour increments (≈ 100 AM, 83 PM) are manageable within the area's operational context—particularly with planned upgrades and with the project's own travel demand measures. Every figure is traceable to empirically-grounded inputs or widely-accepted guidance. We remain available to verify any component of the analysis with the reviewing authorities.

Yours sincerely,

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