

TO: Perit Vincent Cassar, Chairman

FROM: Christine Tanti, Unit Manager

THROUGH: Kevin Mercieca, CEO
Aimee Brincat, Director

DATE: 3rd July 2026

SUBJECT: PA/04313/25, PA/05346/25 & PA/05350/25 (EA/00046/18);
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. &
Construction of a mixed use 40-storey tower (Triq Elija Zammit) making use of FAR policy for tall buildings [...] 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

LOCATION Project Landmark, 1 Garage, 2A & 3A, Triq Santu Wistin across, Triq Elija Zammit, Paceville, San Giljan

1. Introduction and Case Background

The proposal entails a change to the approved high-rise development on Triq Santu Wistin and Triq Elija Zammit in Paceville, San Giljan, formerly known as 'PX Tower'. The revised project, now 'Project Landmark', involves a redesign of the tower structure with an increase in height (from 151 to 184m above sea level), as well as the consolidation of the site through the inclusion of additional surrounding plots (increasing the site area from 3,500 to 4,115 m²).

The original project had been subject to an Environmental Impact Assessment (EIA) during 2021-2022. ERA had communicated its assessment findings and position on the project in February 2022 (Planning Authority's E-Apps documents PA/02470/16 – 192b-d and PA/06097/20 – 62a-c). In its conclusions, ERA had determined that the project was not objectionable from an environmental perspective, subject to various conditions, including some reserved matters regarding air emissions (green travel plan to reduce traffic generation and associated emissions), wind microclimate (additional study on final design to identify required protective measures) and waste management (plan to maximise reuse of excavated material, to avoid disposal and waste of potential resource). ERA had also noted that ideally a comprehensive plan - level picture of the development of the surrounding area is available, to evaluate more accurately any likely cumulative impacts in their fuller context.

With respect to the changes currently proposed through PA/04313/25, PA/05346/25 and PA/05350/25, and their potential environmental implications, the Directorate requested the updating of the studies on landscape and visual amenity, shadowing and the wind microclimate, and their coordinated submission as an Addendum to the EIA Report. The latter was submitted on 15 December 2025 and uploaded on the ERA website (https://era.org.mt/era-project/pa04313-25_pa05346-25_pa5350-25/). The Addendum was subject to review, including a 30-day consultation with the public (covering the period 04 January – 03 February 2026). Following conclusion of the review, the final consolidated version of the Addendum (including feedback received during the consultation and the responses by the EIA Coordinator thereon) was submitted to ERA on 16 April 2026. A summary of the project background, the assessment findings and the process is being annexed to this document as Annex I.

2. Outcome of the updated EIA studies

Visual amenity

The increase in height and redesign of the tower (resulting in a bulkier massing) is introducing additional visual exposure. Such visual changes are most visible from short- and medium distance views, although their significance in terms of visual effect remains unchanged. Likewise, impacts from long-distance panoramic views remain the same, as the proposal clusters together with other tall buildings, and the proposed changes do not affect the significance of such cumulative visual effects. Of note is the introduction of new visual exposure from two viewpoints (Kalkara Bay and Gharghur's Top of the World), from where the tower, with the proposed increased height would now be visible, breaching the existing horizon (with moderate to major significance). On the other hand, the tower would remain invisible from the Vittoriosa and Senglea areas.

The overall impact from the proposed development on the visual amenity of the surrounding environment remains similar to that of the approved development and is intrinsically linked to the high-rise aspect. In terms of cumulation, the assessment re-confirmed that the proposed development tends to cluster with other existing (or permitted) tall buildings, notably in the panoramic views. The cumulative effect decreases with proximity, whereby in streetscapes, the line of sight is limited by the surrounding developments.

Shadowing

The tower structure will cast shadows on surrounding areas, which will be of limited temporal duration for the various locations, following the sun path, and often overlap with shadows cast by other existing building of this densely developed urban area. Similar to the approved development, the significance of the projected shadows remains minor significant for the Swieqi and Paceville residential areas, and moderate significant for commercial and hospitality uses east of the site.

Wind microclimate

The presence of the proposed tower structure will, similar to the approved development, interact with wind and create airflows that may adversely affect surrounding spaces and pedestrian comfort. Windier conditions will arise at ground level near the northern and southern corners of the site, where the adoption of mitigation is required. Ground-level mitigation could be achieved through the inclusion of soft and hard landscaping, including additional planting of trees, installation of pergolas, screens and canopies, to reduce the effects of wind down-washing, channelling and corner-acceleration in exposed pedestrian areas. Subject to such mitigation, the significance of wind disturbance would remain minor, as for the approved development.

3. Directorate's Assessment and Recommendations

The current proposal is considered in the light of the already approved high-rise development commitment established through PA/02470/16 and PA/06097/20.

The Directorate notes that the overall impacts of the development remain in line with those previously considered during ERA's assessment of the 2021-2022 EIA, as these are mostly related to the high-rise aspect. While the additional floors and the redesign of the tower structure will introduce some additional visual exposure, the conclusion remains that such effects were a known concern from the outset and no meaningful mitigation, other than downscaling, can be identified at project-level assessment to address the visual effects of such high-rise development, especially in the context of the already established cluster of similar tall buildings in the area. The same reasoning applies to shadowing effects, as such are inherently linked to the nature of the high-rise proposal.

Impacts in terms of the other environmental aspects previously assessed in the EIA remain unchanged and mainly revolved around construction-phase disturbances (dust, noise, vibrations) and traffic-related emissions during operations, for which a green travel plan had already been requested.

In this regard, noting the above, the Directorate has no objection to the revised proposal, subject to the environmental conditions in Annex II to this memo.