

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

Public consultation on Addendum to the EIA Report (consultation period: 04 January 2026 – 03 February 2026) – Review comments table

Date: 18/02/2026

Section 1: ERA Comments

No.	Ref.:	ERA Comment	EIA Coordinator's Response
1	P37 – 39 (Table 2)	Kindly provide a clearer distinction between those impacts that are as assessed in the previous EIA (i.e. unchanged) and those that have been updated as part of this Addendum, in function of the current proposal. While it is noted that the impacts in terms of landscape and visual amenity are detailed in annex A, it is recommended that table 2 either includes a reference to such or provides a summary of the main effects on this topic, to serve as a comprehensive summary table.	Attached please find table 2, updated with an additional column in colour, summarising the changes indicated in the addendum, as a result of the updated proposal. Additionally, please find table 1, which highlights the changes in terms of landscape and visual amenity.
2	P54 - 59	Kindly discuss further why the changes to the panoramic views from viewpoints 7 (Top of the world, Gharghur) and 9 (Rinella Bay) are assessed as moderate to major significant, noting that the tower structure (i.e. its top floors) limitedly exceeds the horizon within these views.	Both landscapes are deemed to be of high sensitivity given their intrinsic value. In both viewpoints, the tower is visible at a point where previously it was not. Although the extent to which the tower is visible is limited, it is visible on the skyline. The ratings of moderate to major are a conservative assessment arising from the applied criteria, resulting more from a recognition of the sensitivity of the landscape rather

			than from the scale of the actual change. Indeed, had the sensitivity been deemed 'low' or 'medium', the impact significance matrix utilised in this assessment would have given 'minor' or 'moderate' results respectively.
3	P29, Section J and p215 (until end of document) – Annex B	- The updated wind study (Annex B) shows that uncomfortable wind conditions may arise at ground level at the northern and southern corners of the site, as well as along Triq Is-Swieqi (notably during winter), and that mitigation measures are required to improve the wind comfort. While paragraphs 70-72 of the Addendum emphasize the inclusion of various measures to improve the wind comfort on site, kindly clarify what specific measures are included to improve the wind comfort for pedestrians along the public roads, notably Triq Is-Swieqi, to offset adverse effects from the tower structure. - The table on p39 indicates (under 'proposed mitigation measures') that a wind study on the final structure is proposed. It should be clarified whether this refers to the study already undertaken as part of this Addendum or whether another update is required at a later stage, to define the exact parameters of the mitigation measures once all final design details of the tower are defined.	With respect to pedestrian wind comfort along the public roads, the report states that the windier ground-level conditions are concentrated mainly near the northern and southern corners of the site, where mitigation is considered necessary. In this regard, the report specifically refers to "additional trees to the west as well as within planter areas of the drop off space" and a "canopy to the west and north-west" as example ground-level mitigation measures, while also noting in its conclusions that landscaping and canopies have been recommended to the north (see Figures 5 and the Conclusion section, pp. 8 and 13). It further explains, in the appendix, that local mitigation may take the form of soft and hard landscaping, including pergolas, screens and canopies, as well as planting and screens used to reduce down-washing, channelling and corner-acceleration effects in exposed pedestrian areas (see pp. 16–18). An update would still be required at detailed design stage, but only as a final optimisation exercise to confirm and refine these measures, rather than to introduce any major design changes.
4	General remark	For upfront guidance; the Applicant is to be informed that any combustion plants such as generators or boilers present on site exceeding the rated thermal input of 1MWth require an Environmental Permit in line with S.L.549.122 (Application forms are available on https://eris.eraportal.org.mt/)	Noted; a permit application will be submitted in due course.

Section 2: Comments by consultees and the public

A. Civil Protection Department (submission received on 07 January 2026)

Comment	EIA Coordinator's Response
The architect and the fire safety competent engineer shall ensure adherence and compliance with the British fire safety standards. They shall prepare the necessary fire safety documentation including adherence declarations and compliance.	The proposed fire safety design for Project Landmark is in line with the requirements and recommendations of BS 9999:2017 (Incorporating Corrigendum No.1) – Fire safety in the design, management and use of buildings (and the relevant BS Codes and European Norms referenced therein) and, where necessary, the requirements and recommendations of the BS 7974:2019 series – Application of fire safety engineering principles to the design of buildings – Code of practice.

B. Swieqi Local Council (submission received on 15 January 2026)

Comment	EIA Coordinator's Response
Re: Public Consultation in relation to the review of an Addendum to EIA report for PA/04313/25 - Project Landmark ERA/00046/18 The Swieqi Local Council is very concerned about two aspects of the above EIA Addendum. The first concerns the absence of any attempt to evaluate the effect of vehicular traffic which will be generated by the project. Traffic generated by the proposed 7 floors of offices, 15 hotel floors and 10 residential floors will	Kindly note that the EIA documents pertaining to these development applications include a traffic study, that clearly indicates that this project will not result in the generation of traffic further to that which is already approved.

Comment	EIA Coordinator's Response
clearly be considerable. This traffic will end up either at the Paceville junction leading to Triq Mikiel Anton Vassalli, a junction which is severely congested at certain times of day, or even worse into Paceville towards St George's Bay or into Swieqi via Triq is-Swieqi. The Council is concerned that no project by Infrastructure Malta is on the cards to deal with this massive increase in traffic, following their withdrawal of PA 6089/19 and 6079/24. Application PA 550/24, which might (although this is not guaranteed because the contents of this application are still shrouded in mystery) address the problem is still listed as "not complete" by the PA, and the Council wonders if this application will ever become a complete one. Triq Sant' Andrija and Triq MA Vassalli are routes which are used continuously by Swieqi residents, and the approval by the Planning authority of major projects which will affect these roads, including the dB mega-development in St George's Bay, the approved Villa Rosa Local Plan, various hotels being approved in Paceville, and now the Landmark development, will clearly negatively affect Swieqi's connectivity unless the infrastructure is modified to cater for these developments. The Swieqi Local Council therefore insists that a proper Traffic Impact Study be carried out, by experts who are independent of the developer, before any more large-scale permits are issued in this area. The second problem concerns the shadowing effect on residential areas off Swieqi which the proposed development will create. The Swieqi Local Council is only concerned with then effect on its residential areas, although it recognises that the shadowing effect on parts of St Julians / Paceville and on commercial areas even in Swieqi will also be significant. The well-being of Swieqi residents is constantly a top priority for the Council. The Council notes that the development being considered proposes an increase in height of just under 33 metres compared to the previous submission, and also an increase in footprint (which clearly affects the width of areas in shadow). Referring to the Solar Path and Shading Evaluation section of the EIA, the Council notes that 1. Early afternoon shadows cast will reach St George's Bay in December afternoon. St George's Bay and Beach is the seaside area most easily accessible to Swieqi residents. This Bay is very much frequented in December	As regards the development of the junction upgrade, the permit process on PA550/24 is being reactivated. Discussions between the applicant and Infrastructure Malta (IM) are ongoing at this point in time. Feedback from Transport Malta on the development permit process is aligned with these developments, and makes refernece to the studies commissioned by IM regarding traffic at the junction. Comments regarding the shadowing cast by the tower are noted. Shadowing is reflected as an impact within the Addendum, as it had been within the original EIA process for the deveelopment already approved. The objection to the shadow cast is noted; however, there is no approved or draft policy direction on the acceptability or otherwise of shadows cast by urban massing of any kind. As regards the request for compensatory measures, it is expected that the development permit process will include some form of planning gain as has been the case with equivalent projects.

Comment	EIA Coordinator's Response
by Swieqi residents for pleasant walks along the sea, and the conclusion that this area will be in cold shadow at this time will deprive residents of a privilege which they have so far enjoyed. This would represent a down grade of their quality of life, for the benefit of a commercial development, and is to be objected to. 2. The sunpath analysis shows that Triq I-Gharbiel in Swieqi will be seriously affected by shadowing throughout the year: June 8am to 11am, September 8am to 10am, and March 7am to 10am. In addition, residential areas in Triq il-Migbed and Triq is-Sirk will be in shadow in June between 8am and 10am, Triq in-Nemes in September 10am to 12 am and March 9am to 11am. Although this shadowing is described as "transient" in the report, it is a fact that once more the enjoyment of their properties by residents in these streets will be curtailed. The construction of the tower will represent a gain to the developer but a loss to the residents. This must also be objected to. If the project were to be eventually approved, the Swieqi Local Council requests that environmental compensatory measures be required to be effected by the developer in these areas. Swieqi and its residents cannot continue tolerating the degradation of their quality of life as a direct result of development projects. Planning is primarily for people, the PA and ERA must never forget this.	Kindly note that the developers will be maintaining contact with the Local Councils throughout the duration of the project to ensure that impacts on localities are maintained at a minimum, and that complaints are addressed as soon as possible.

C. Environmental Health Directorate - Department for Health Regulation (submission received on 27 January 2026)

Comment	EIA Coordinator's Response
With reference to the Environmental Impact Assessment (EIA) dated January 2026 regarding the subject indicated in the caption, kindly be informed that this Directorate would like to submit the following comments and recommendations in relation to the proposed development.	As per previous feedback provided to the EHD, Note is taken on the comments made on construction management; as stated in the section on Mitigation and Monitoring in the

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The previous comments on the subject in caption, dated 26 April 2021 and 16 November 2021, are still considered applicable, as the changes to the project are expected to result in impacts that are broadly similar to those associated with the original proposal. However, it is noted that the projected sewage volume will increase substantially from 20,000 m³ to 54,000 m³. Given that the site is located in close proximity to the official bathing site at St George's Bay, which is monitored through two designated monitoring points, concerns are raised as to whether the existing sewage infrastructure is sufficient to accommodate such a significant increase in volume. In the event that the infrastructure is not capable of handling this increase, there is a risk of sewage overflow, which could negatively affect the bathing water quality in the area. Furthermore, this project will considerably increase the operational traffic pollution including noise in the area of influence. It is important that the necessary mitigation measures are to be adopted. Furthermore, with reference to previous comments made pursuant to the Food Safety Act, including those related to drinking water, it is noted that the Environmental Health Directorate (EHD) no longer retains competence over the regulation of drinking water. Consequently, all responsibilities and matters pertaining to this regulation now fall under the remit of the Food Safety and Security Authority within the Ministry for Fisheries and Agriculture.	coordinated assessment, these will be given due consideration in the construction management process. The latter will consider necessary control of emissions to air, water and noise, and include provision on pest control. Regarding the comment on sewage, discussions with Water Services Corporation have confirmed that they can cater for the required discharge to the sewage network, and have identified the galleries to which connections can be made. Kindly note that the EIA documents pertaining to these development applications include a traffic study, that clearly indicates that this project will not result in the generation of traffic further to that which is already approved.

D. Occupational Health & Safety Authority (OHSA) (submission received on 02 February 2026)

Comment	EIA Coordinator's Response
The employer at this site shall ensure that: 1. All work activities at this place of work comply with the requirements of Act XXXIII of 2024 and all relevant OHS regulations. 2. One or more persons having the necessary aptitude, capabilities, competence and training shall be designated to assist the employer in undertaking the measures which are required to be taken in relation to the protection of occupational health and safety and the prevention and control of occupational risks, as per LN 36 / 2003. 3. ALL work activities falling under one's responsibilities are covered by a suitable, sufficient and systematic risk assessment carried out as per LN 36 / 2003 and other relevant OHS regulations. Without prejudice to the legal obligations of an employer, this risk assessment shall, inter alia, refer to: (a) The measures to be taken against risks from manual handling of loads as per LN 35/2003. (b) Protection against exposure to chemical agents including carcinogens at work as per LN 227/2003 and LN 122/2003 including but not limited to measures against inhalable dusts and metals. (c) The measures to protect workers from risks from exposure to the sun. (d) The required emergency prevention, preparedness and response arrangements including first aid and firefighting measures. (e) Protection against physical agents at work including but not limited to risks from noise and vibration. (f) Traffic management. (g) Protection of workers from risks of electrocution as required by LN 44/2002. (h) Personal protective clothing / equipment to be used by workers. (i) Suitable welfare facilities to be made available for staff. (j) The required health and, or safety signs and. (k) Training and competence of workers to perform the assigned tasks. This risk assessment shall also make reference to the necessary health surveillance that is required wherever there is revealed an identifiable occupational disease or adverse health condition related to the work involved	it is confirmed that all work activities shall comply with the requirements of Act XXVII of 2000 and all relevant OHS regulations.

Comment	EIA Coordinator's Response
OR the likelihood that a disease or condition may occur under the particular conditions of work, as per LN 36 / 2003 and other applicable OHS regulations. 4. All work equipment complies with the relevant provisions of LN 293 / 2016, including where applicable, by ensuring that work equipment is duly examined by a competent person and a report of such examination is kept by the employer and (where applicable) also sent to OHSA and. 5. Any intended construction related works comply with the relevant provisions of LN 52/2025 in particular: - Ensuring that a competent project supervisor is appointed for both the design and execution stages. - The preparation and implementation of a Construction Phase Health and Safety Plan prior to commencement of works. - The coordination of health and safety measures among all contractors and workers on site. - The provision of adequate welfare facilities, safe access and egress, and protection against falls and other site hazards. - The notification of the construction project to the OHSA as required by the regulations.	

E. Members of the public

No.	Comment	EIA Coordinator's Response
1	I strongly OBJECT to this project due to the environmental and infrastructural impact on the area and vicinity. - The shadow it will cast on Swieqi. - The light pollution added to the already disastrous situation we are living in. - The lack of proper infrastructure (water and electricity supply is already poor without all this, the sewage overflow at every rain already as it is, the added traffic, garbage and population , etc)	- Refer to feedback to Swieqi Local Council on shadowing - Cumulative effect on light pollution is noted in the EIA process; light fixtures will abide by the draft policy: <i>Guidelines for the Reduction of Light Pollution in the Maltese Islands.</i>

No.	Comment	EIA Coordinator's Response
	4. These projects and the repercussions that they cause effect people' s mental and physical health and wellbeing. We speak so much about this final topic but don't truly consider preventing them.	3. Refer to feedback provided to EHD 4. The issue of construction fatigue is consdiered in the Social Impact Assessment conducted as part of the development permitting process.
2	Jien ma nagbilx li jizdiedu il- sulari bizzejjed li ahna ir-residenti tas -Swieqi indfinna go togba u ix-Xemx u d-Dawl ma jarawx Id-djar taghna. Tal- misthija kif ir-residenti gew injorati minnkom! Ximpatt ambjentali gedin tistaQsu? Lanqas Biss ghandna ambjent hlif konkos madwarna!!!! Fein hom il-green areas?!! Fejnu naqra pajsag ahjar?!! Hlief konkrit ma narawx quddiem ghajnejna! Hlief dhahen ma nibilawx! Bankini imkissrin, toroq mimlija pot holes habba it-trukkijiet kbar dejjem ghaddejjin hlief Hsejjes 'noise pollution' m'ghandnix! U xi nghidu ghat- trab u l-aria li qed nibilaw?! Bizzejjed jekk jogghobkomm ghax Issa ghajnejna ta bil- kbir nigu Injorati! Aktar sulari aktar nies aktar storbu aktar dell u dlam lejn Id-djar taghna!!	The issue of construction fatigue is consdiered in the Social Impact Assessment conducted as part of the development permitting process. Refer to feedback to Swieqi Local Council on shadowing. As regards the impacts resulting from construction; as stated in the section on Mitigation and Monitoring in the coordinated assessment, these will be given due consideration in the construction management process, as per applciable legislation.
3	This will suffocate the already suffocated residents of Swieqi, St. Julians and Pembroke. You greedy and selfish developers have butchered Malta to a point of no return. Leave us in peace! Move on to another country! We don't need you here! Enough is enough!	The issue of construction fatigue is consdiered in the Social Impact Assessment conducted as part of the development permitting process.
4	I am objecting to the this proposal because:	The issue of construction fatigue is consdiered in the Social Impact

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	1. Saying the building of a skyscraper is positive because it kills non endemic plant species is an insult to people's intelligence. Do you need to build 40 storeys to kill alien species? 2. Casting the residents' homes in the shade, not seeing the sun from dawn till around 10 a.m., for 6 months a year, from March to September, is inhuman. It will not only make these house colder, and therefore more expensive to heat, because solar panels will be useless at that time and more electricity will have to be used for heating, and thus more environmentally damaging, but it could also lead to mental health problems, since darkness and greyness contribute to depression. 3. Saying that traffic flows in the area as well as Swieqi will not be impacted is absolutely untrue.. The area is already fully congested today. with difficult, chaotic and unsafe traffic flow that impacts residential rights to clean air. 4. Saying that the building will be surrounded by open spaces is treating residents like dirt. There is currently barely any room for open space in the already overbuilt area of Bay Street, St George's Bay.	Assessment conducted as part of the development permitting process. Refer to feedback to Swieqi Local Council on shadowing and traffic. The extent of open space that will be available is clearly visible on plan.
5	Le! Le! U le! Kif tridu tordmu lil kullhadd	The issue of construction fatigue is considered in the Social Impact Assessment conducted as part of the development permitting process.
6	1. Saying the building of a skyscraper is positive because it kills non endemic plant species is an insult to people's intelligence. Do you need to build 40 storeys to kill alien species? Just ask Jason Micallef for some Greek gravel.....and it will do the job! 2. Casting the residents' homes in the shade, not seeing the sun from dawn till around 10 a.m., for 6 months a year, from March to September, is inhuman. It will not only make these house colder, and	The issue of construction fatigue is considered in the Social Impact Assessment conducted as part of the development permitting process.

No.	Comment	EIA Coordinator's Response
	therefore more expensive to heat, because solar panels will be useless at that time and more electricity will have to be used for heating, and thus more environmentally damaging, but it could also lead to mental health problems, since darkness and greyness contribute to depression. 3. Saying that traffic flows in the area as well as Swieqi will not be impacted is taking people for aride. The area is already fully congested today. 4. Saying that building will be surrounded by open spaces us treating residents like dirt. Go on the spot today and see for yourselves how much room there is for open space in the already overbuilt area of Nay Street, St George's Bay.	Refer to feedback to Swieqi Local Council on shadowing and traffic. The extent of open space that will be available is clearly visible on plan.