

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) – Comments received by ERA from consultees and the public

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

Comment
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.

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

Comment
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.

Comment

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 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 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.

Comment
<p>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.</p> <p>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.</p> <p>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.</p>

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

Comment	ERA note
<p>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.</p> <p>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.</p> <p>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</p>	<p>The previous responses from this consultee, as referenced to, can be accessed from https://era.org.mt/era-project/pa02470_16_and_pa06097_20/ - docs 'Public comments on the 1st EIA</p>

Comment	ERA note
<p>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.</p> <p>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.</p> <p>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.</p>	<p>report' and 'Public comments on revised EIA report').</p>

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

Comment
<p>The employer at this site shall ensure that:</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> (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.

Comment	
(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.
<p>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 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.</p>	
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: <ul style="list-style-type: none"> • 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
1	<p>I strongly OBJECT to this project due to the environmental and infrastructural impact on the area and vicinity.</p> <ol style="list-style-type: none"> 1. The shadow it will cast on Swieqi. 2. The light pollution added to the already disastrous situation we are living in. 3. 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) 4. These projects and the repercussions that they cause effect people' s mental and physical health and wellbeing. <p>We speak so much about this final topic but don't truly consider preventing them.</p>
2	<p>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</p> <p>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 storbju aktar dell u dlam lejn Id-djar taghna!!</p>
3	<p>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!</p>
4	<p>I am objecting to the this proposal because:</p> <ol style="list-style-type: none"> 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

No.	Comment
	<p>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.</p> <p>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.</p> <p>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.</p>
5	Le! Le! U le! Kif tridu tordmu lil kullhadd
6	<p>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!</p> <p>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.</p> <p>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.</p> <p>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.</p>