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Our ref: MIP007

17th November 2020

Anna Lucia Cantafaro
Environmental Assessment Unit
Environment & Resources Authority
Hexagon House,
Spencer Hill, Marsa,
MRS 1441

Dear Ms Cantafaro,

Subject: PA 02509/20: Proposal for the Construction of Multi-storey Car Park to Serve Adjacent Aircraft MRO Facilities, at Malta International Airport, Luqa

We refer to your email of 3rd July 2020, requesting the expected increase in traffic flows in Annual Average Daily Traffic (AADT) in relation to the proposed multi-storey car park within the Malta International Airport (MIA) complex, subject of PA/02509/20. This followed the submission of the Project Description Statement (PDS) for the proposal, in June 2020.

We also refer to our recent discussion with the Director of the Environment, where it was suggested that we elaborate on the explanation given in the PDS in respect of traffic generation from the new car park.

For the reasons more fully explained below, we consider that the proposed car park will not result in significant traffic generation, and that it will not have a significant impact on the air quality on Triq Hal Farrug and the surrounding area.

At the outset, we highlight that the construction of a car park in this general location within the MIA complex is a requirement of the Full Development Permit issued for the LTM hangar (on 21st April 2020), under PA/09701/19. *Please note the clarification in the name, where in the PDS this was erroneously referred to as the SR Technics hangar.*

PA/09701/19 is specifically conditional to provision of a car park in the proximity of the LTM hangar, to serve the needs of its employees (Condition No. 3), as follows:

“The development hereby being approved shall not be brought into use until such time that a development application for the required parking provision is submitted and approved by the Planning Authority. The site for the proposed parking shall be within a reasonable distance from the site subject to this development permission and shall cater for the full requirement in parking provision relative to the increase in number employees”.

The proposed car park has been specifically designed to accommodate the full employee compliment of the LTM hangar when it comes into operation, in fulfilment of Condition No. 3 of PA/09701/19.

Additionally, as explained in the PDS, the car park is also intended to serve the needs of the aircraft Maintenance and Repair Organisation (MRO) facilities generally, including the new SRT hangar approved under PA/09710/19, which is also under construction on land adjacent to the site of the proposed car park. *Again, note the clarification in the name, where in the PDS this was erroneously referred to as the Lufthansa hangar.*

It was also explained in the PDS that the car park is intended to serve an existing parking need, where a significant number of the employees of both the new LTM and SRT Hangar are already working within the MIA complex. In addition, and as a clarification to the explanation given in the PDS, the car park will also serve as parking space for the employees of the existing MCM hangar, located approximately 500 m from the site, within the MIA complex. Importantly, the journeys made by these existing employees to / from the area are already accounted for in the current network flows.

It is also notable that the parking needs of these existing employees are currently served by off-site, roadside parking. Hence, the car park will serve to reduce the parking pressure on Triq Ħal Farruġ in particular.

It is also important to note the land use context, given the location of the site and the surrounding activities and uses. As mentioned, the car park will serve the parking needs of existing employees, as well as that of the additional employees envisaged by the development permitted under PA/09701/19 (LTM hangar) and the new SRT hangar. Where it transpires that there is additional capacity, this may serve the parking needs of existing uses and activities along Triq Ħal Farruġ, primarily of the Ħal Farruġ Area of Containment opposite the site for the car park. Again, the journeys made to / from the area in connection these uses and activities are already accounted for in the current network flows. Critically, the car park itself will not generate traffic, unlike a commercial car park located in a town centre, for example.

In conclusion, it is considered that the proposed car park will not result in significant traffic generation, and that it will not have a significant impact on the air quality on Triq Ħal Farruġ and the surrounding area. This is by reason of the fact that that it will primarily serve the parking needs of the employees of the MRO operators. Any additional capacity will likely serve the parking needs of existing uses and activities along Triq Ħal Farruġ.

We trust that the above is to the satisfaction of the ERA. Should you require further details, or wish to discuss further, please do not hesitate to contact the undersigned.

Yours sincerely,



Yury Zammit
Adi Associates Environmental Consultants Ltd