PA/00060/20 (EA/00050/20) – Comments received by ERA during the public consultation on review of the *Update of the Environmental Impact Assessment (EIA) Report*.

Consultation period: 31 October 2021 – 30 November 2021.

Government entities:

A. Malta Tourism Authority (MTA) (Email dated 16 November 2021)

Comment
The MTA does not have any comments to make on the updated EIA. It is noted that a class 4d is proposed in Zone C. MTA will comment on this specific aspect of the development during the PA application process.

B. Environmental Health Directorate (EHD) (Email dated 25 November 2021)

Comment
Should this proposal be accepted, the applicant is to adopt methods of best practice together with good site practices and ensure compliance with Environmental Management Construction Site Regulations during the construction phase. Moreover, the applicant is to implement all proposed mitigation measures so as to reduce any nuisance and mitigate adverse air (from dust dispersal and emissions from vehicles and machinery) and noise pollution and vibration impacts on sensitive receptors in the Area of Influence and to the general public. Hence it is important to draw up and implement a Construction Management Plan to ensure adherence to proper site management practices so as to address groundwater and surface water pollution, to mitigate other adverse construction impacts, including construction traffic impacts and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project. The use of water sprays to maintain dampness of the mineral can cause surface runoff on low laying streets thus this has to be mitigated. The creation of water aerosols from such activity should also be minimized as this may be of risk to employees and public in area and hence it is recommended that said water is treated with chlorine prior use. Safe and proper handling of raw materials on site should also be ensured to reduce the risk of spillage that might lead to contamination of ground and surface water. Good practice and adequate preventive measures are to be taken for any accidental spillage of construction material and/or excavation waste, hazardous fluids, fuel and lubricants which are also to be well managed and adequately stored.

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Water collected from rain MUST NOT be used for human consumption. The overflow of reservoir used for the collection of rainwater MUST NOT be connected to the drainage system but onto the street. Water that will be used for flushing apparatus must be treated with a biocide prior use. If any rainwater collected from carpark spaces is to pass through an oil/water separator prior being collected in the reservoir. It is suggested that landscaping irrigation is carried out by a dripping system to prevent the speared of aerosols that might be a source for Legionnaires Diseases. 1st Class water reservoir is to be made with food grade material and properly sealed to not allow any external contamination. 1st class water cannot be mixed with 2nd class water if it will be used for human consumption. The responsible person is obliged under LN 5 of 2006, Control of Legionella, as amended by LN 262 of 2006, to maintain and take microbiological samples from water from water features situated in the scheme. Samples are to be tested for Legionella once every six months and Heterotrophic count once a month. Legionella tests are to be carried out in an accredited lab. Moreover, since the proposed project includes showers, the requirements as LN 5 of 2006 for the Control of Legionella are to be adopted as necessary. Waste management strategy should be adopted and implemented during the construction and operational phases so that all generated waste streams will be contained, separated and disposed of safely through the appropriate facilities and according to the necessary permits/licences. With regards to removal and disposal of any hazardous waste, adherence to regulatory codes and procedures and due diligence is important in view of health and safety and any adverse impacts on nearby sensitive receptors. Generated waste, cleaning chemicals, etc. from any temporary sanitary facilities for on-site workers should be properly disposed of. Every restroom present on the premises should be supplied with a wash hand basin and adequate source of ventilation and light. The wash hand basin should be supplied with potable water and connected to a wastewater pipe that discharges on a gully trap situated in an open area and connected with regular drains. It is recommended that during the construction phase, traffic follows established specific routes and adequate site management. When transporting of creed sand and other loose building materials, containers should be well covered. Washing of wheels and other dust control measures are to be taken to mitigate adverse dust impacts and nuisances from heavy vehicles during transportation. All other mitigation measures which may be necessary to minimise nuisances and adverse health impacts from construction traffic are to be implemented. It is recommended that a Green Travel Plan, as mentioned in the EIA, is to be adopted since the area is already affected by heavy traffic especially during the peak hours. It is also recommended that this Travel Plan is consulted with the competent authorities and other stakeholders to prevent and where possible reduce traffic congestion in the area since it may also have an impact on the leading to Mater Dei Hospital. All proposed mitigation measures regarding adverse impacts arising from this development during the construction and operation phase are to be implemented by the applicant to mitigate any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and

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to the general public. The possible health effects of any residual impacts that cannot be mitigated and the overall cumulative impacts should also be taken into consideration. Land use requirements during construction phase, such as the use of major roads which lead to traffic build up and road safety issues should be addressed in the Environment Planning Statement. Any fuel storage must be placed in a sealed and leak-proof container to minimise the risk of contamination through leakages into the underlying surface. The site should be sealed with geotextile material and covered with an impermeable layer of concrete to cover all the scheme. Moreover, any other unpredicted impacts and nuisances which may arise from this development and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken. Complaints lodged by the public regarding any adverse impacts/nuisances should immediately be addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested. A pollution incident control plan should also be in place. Records of all such incidents, especially regarding potential pollution of the surrounding environment, are also to be kept and reported to the respective authorities accordingly. Regarding any future decommissioning plans, these should be prepared for approval by the relevant competent authorities. With regards to the canteen, it is recommended that consultation is sought with the Health Certification and Consultation Unit with the Environmental Health Directorate. Any risk to workers from repeated exposure to dust particulates, noise and vibration in buildings should be referred to OHSA.

C. Superintendence of Cultural Heritage (SCH) (Email dated 29 November 2021)

Comment
Ref. Cultural Heritage Act 2019 (CAP 445) **EA/00050/20 i.c.w. PA/01179/10 & PA/00060/20 – Life Sciences Park, Triq San Giljan c/w, Triq Sir Anthony Mamo, San Gwann**

Comment

Review of results identified in the Environment Impact Assessment

The Superintendence has assessed the data gathered and compiled in the technical reports entitled *Environmental Impact Statement Non-Technical Summary, Update to the EIA Report and Technical Appendices (Volume 2).*

Proposal

As specified by the architect, the proposal includes revisions to masterplan PA/01179/10, including change to building footprint and building height and landscaped area, proposed footbridge connecting Life Sciences Park to Mater Dei Hospital.

Drawings and descriptions within the EIA indicate that the proposed 2020 Masterplan will retain the existing zones, however, proposes changes to the layout and height of the unbuilt blocks. It also introduces a pedestrian / cycle bridge that links the centre of the Life Sciences Park with Mater Dei Hospital. The major change within this proposal in comparison to the approved Masterplan is with regards to the height of the proposed buildings, where the height of most buildings is set to increase substantially, with the exception of building LS5, which will be decreased by one floor.

Cultural Heritage Context

The Superintendence notes that the area proposed for development is situated within an Industrial Area. There are no scheduled cultural heritage features within the immediate vicinity of the development site. Nevertheless, Wied Ghollieqa, a Level 4 Area of Ecological Importance is located immediately east of the site.

The area is known to be archaeologically sensitive, and several archaeological discoveries have been made within the vicinity of the development site. An ancient quarry was uncovered within the site footprint in 2013 (site code SNG2013) during works for the Life Sciences Complex. The Superintendence draws attention to this discovery, which is evidence of the archaeological sensitivity of the area. Any further works as may eventually be approved are to be archaeologically monitored.

Report on Cultural Heritage

The study rightly notes that no scheduled cultural heritage features are within the immediate vicinity of the development site. It specifies that the nearest feature is a Grade 2 scheduled windmill (Il-Mithna fi Triq San Giljan: GN 486/12), located approximately 185 metres west of the development site on Triq San Giljan. A total of 16 cultural heritage features are listed in the vicinity of the site footprint (although none of them are within the immediate vicinity), these include:

Name	Grade / Proposed Grade	GN Number

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Dwelling No. 39	Grade 2	GN 722/95
Dwelling No. 39	Grade 2	GN 22/12
Medieval Tower	Grade 1	GN 1082/09
Collegiate Parish Church of St. Helen	Grade 1	GN 782/11
Muxrabija No. 84	Grade 2	GN 1262/16
Windmill	Grade 1	GN 482/12
Military pillbox	Grade 1 (proposed Grade 2)	GN 722/95
University Chapel	Grade 2	GN 522/12
Recreational Student House	Grade 2	GN 522/12
Covered Passageway	Grade 2	GN 522/12
Ex-Architecture Educational Block	Grade 2	GN 522/12
Farmhouse	Grade 1 (proposed Grade 2)	GN 618/94
Tal-Gharghar Chapel	Grade 1	GN 731/94
Ta' Cieda Roman Tower	Class A	GN 588/94
Flour Mill	Grade 1	GN 1260/10
Santa Margerita Chapel	Grade 1	GN 731/94

Archaeological features are mentioned in the study, namely of the Class A Site of Archaeological Importance, including a cistern and a Roman wall at Triq Bazura, which are located approximately 404 metres to the east of the site. Nevertheless, the Superintendence notes that several archaeological features within the vicinity of the development site have not been mentioned (including the discovery located within the development site itself, as previously mentioned). These include a Roman cistern (site code BKR1918), approximately 300 metres away, cart ruts (site code MSD1934), approximately 145 metres away, and further cart ruts (site code NHLP17), approximately 157 metres away.

The Superintendence notes with some concern, that the report makes no reference to the archaeological discovery recorded within the

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development site itself. This is recorded as being an ancient quarry situated within the site and given the site code SNG2013 by the Superintendence of Cultural Heritage. With regards to landscape, the study states that the landscape of Wied Għollieqa has been subject to significant development since the 1960s, and as the areas of San Gwann, Msida and Birkirkara have continued to grow, the valley has become characterised by urban development. The consequence of this has brought about a coalescence of Msida, San Gwann and Birkirkara as localities. Whilst Wied Għollieqa still retains a certain degree of visual separation between these areas, its original geomorphology can no longer be recognised. The Superintendence finds this characterisation to be excessive. While the valley has undoubtedly been subject to encroachment and urbanisation, even a casual look at Planning Authority's Geo-Server shows a clear band of greenery surviving between Msida and San Gwann, with much of this tract being Outside Development Zone and subject to various levels of protection. Even the assertion that its geomorphology cannot be recognized is an overstatement, since urban development generally stops at the edge of the valley. The Superintendence would caution against such sweeping statements, which risk devaluing the surviving values of the valley. **Report on Visual Impact** According to available photomontages in the study, views from the Msida Area (Viewpoint 1: L-Universita ta Malta and Viewpoint 2: Mater Dei Hospital main entrance), Birkirkara (Viewpoint 3: Triq Sir Anthony Mamo) and San Gwann (Viewpoint 4: Triq Sir Anthony Mamo and Viewpoint 6: Triq Bellavista) will be the most impacted. Whilst these views are already impacted to some degree with existing development, the proposed Life Sciences buildings are larger than any other structure within the immediate vicinity. Furthermore, the increased volume and scale of these proposed structures make them the dominant visual feature in all the above-mentioned viewpoints. The Superintendence notes that from the University Car Park (Viewpoint 1), the proposed structures will be very visible and very conspicuous. The visual impact will even more dramatic since at present the view from the car park is dominated by the relatively lush and pristine valley, dominated by trees and vegetation, extending almost to the apparent horizon. The volumes of the proposed structures will stand in stark contrast to the current landscape, dramatically and negatively altering it. The Superintendence would consider this impact on the landscape to be major, rather than moderate-major as stated in the assessment. Views from Valletta (Viewpoint 5: Il-Gnien ta' Hastings, Il-Belt Valletta) indicate that the height and volume of the proposed Life Sciences buildings will be visible even from this distance. However, as the proposed development does not break the skyline, the eye is not drawn specifically to it. In comparison, views from Sliema (Viewpoint 8: Ix-Xatt ta' Tigne viewing platform, Tas-Sliema) indicate that the large structures will be more visible from this location than in Valletta. The large volumes can be seen rising from the general urban skyline; however, they are not the highest buildings in the viewpoint, and as such, are not the predominant focal point. Views from Mdina (Viewpoint 7: Is-Sur tal-Mdina, L-Imdina) showcase that the

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proposed structures will rise significantly higher than the existing Life Sciences buildings at the site in question. Nevertheless, the built-up nature of the surrounding area does not specifically draw the eye to the proposed development. **Conclusion and Recommendations** The Superintendence notes that the study rightly points out the scheduled cultural heritage features that are located within the vicinity of the proposed development site. Furthermore, it correctly details the geomorphological changes that have occurred in the nearby landscape due to urbanisation and growth since the mid-20th century. Nevertheless, whilst noting the inclusion of archaeological features, this office must note the omission of significant archaeological features which are identified in the records held by the Superintendence. These are located in the vicinity of the site, with an ancient quarry being located within the site itself. The Superintendence recommends the following additions be added to the report: • It is important that these features be included in the data capture. • Beyond the identification of these features, the report is to include an assessment on the survival or otherwise of the quarry within the site and make appropriate recommendations for its treatment. • The authors are advised to consult even with the Superintendence with regards to data that may not be available to them. Available viewpoints have indicated that the predominant visual impact of the proposed development will be within already built-up areas. This is particularly evident in Msida, Birkirkara and San Gwann, where in nearly all cases the impact will be moderate to major due to the increased height and volume. With regards to historic views such as Valletta, Sliema and Mdina, the proposed development is noted to be still visible at considerable distance, however, it is also evident that the higher volumes will not be the predominant focal point in these views, and as such, are more moderate in nature. Considering this, the Superintendence is in agreement with the conclusions reached with regards to the visual impact, which will be significant within the immediate vicinity, where the higher volumes dominate the landscape. However, the Superintendence once again draws attention to its opinion that the negative visual impact of the proposed structures as seen from Viewpoint 1 (Msida – University Car Park) will be of major significance rather than moderate-major. Whilst less drastic, this development and its larger buildings will still be evident at considerable distances. Furthermore, no mitigation measures are proposed for impact on visual amenity or landscape.

NGOs:

No feedback received.

General public:

No feedback received.