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Our Ref.: MED004  
PA Ref.: PA/00060/20

14<sup>th</sup> May 2020

Ms Charlene Smith  
Team Manager  
Environmental Assessment Unit  
Environment & Resources Authority (ERA)  
Hexagon House  
Marsa

Dear Ms Smith,

**PA/00060/20: Revisions to masterplan PA 1179/10**

Reference is made to ERA's letter dated 21<sup>st</sup> January 2020 requesting the following:

*In order to screen the proposal for in terms of EIA requirements arising from the EIA Regulations, 2017 (S.L. 549.46), applicant/architect is to provide a statement from the EIA Coordinator that carried out the EIA (EPS) for the development within the same site (PA 01179/10). This statement is to confirm or otherwise whether the changes as proposed by this application are such that they may have a significant impact on the environment and thus change the nature of the EIA undertaken for the same application. This statement should also incorporate the changes being proposed in PA 08153/19 and PA 08176/19, as similar requests made by ERA through these two applications are still pending submission.*

In order to assess the proposed changes, the Applicant provided plans for the proposed changes to the Master Plan that was approved under PA/01179/10.

Malta Enterprise and Malta Industrial Parks have been seeking to develop the remaining vacant area of the Malta Life Sciences Park (MLSP). Up till now LS1, LS2 and LS3 (better known as the Digital Hub) buildings have been built and are operational. LS4 block basement level has also been built and there is a sub-station building LS5. The remaining area which is earmarked for the new development is approximately 18,700 m<sup>2</sup>; this part of the Master Plan will be referred to as Phase 2. **Figure 1** shows the approved Phase 2 of the Master Plan as well as the proposed development.

**Attachment 1** shows the difference in height and Gross Floor Area (GFA) of the approved Master Plan buildings that have not been built and the proposed Phase 2 of the Master Plan.

It is noted that an Environmental Planning Statement (EPS) was submitted for the development of the entire Life Sciences Park in San Gwann, as part of the outline planning application PA 01179/10.



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At the time of writing the EPS, the end tenants for the Life Sciences Park had not yet been secured. With regards to Phase 2 the EPS states, *The Master Plan does not provide a breakdown on the land uses within the 20,560m<sup>2</sup> of Phase 2.*

The proposed Master Plan Phase 2 has an internal floor area of 30,106 m<sup>2</sup>, an increase of approximately 7,940 m<sup>2</sup> to that already approved (22,165m<sup>2</sup>). It is pointed out that in the EPS Zone C (1,605m<sup>2</sup>) was considered part of Phase 1. The major change in GFA is in Zone D where an additional 8,608 m<sup>2</sup> of Class 4 (a) (financial, professional and other offices) and 5 (a) (light industry) are proposed. It is noted that there is a reduction in GFA in Zone C from 1,605 m<sup>2</sup> to 938 m<sup>2</sup>, hence the net increase in Zone D of 8,608 m<sup>2</sup>. In the approved development Zone D was approved as Class 11 – business and light leisure. The new Master Plan proposes a change of use in both Zones C and D. Whereas the approved classes were Class 6 (a), Class 8 (a), Class 8 (b)<sup>1</sup> for Zone C and Class 11<sup>2</sup> for Zone D, the proposed Master Plan is for Class 2 (c)<sup>3</sup>, Class 3 (c)<sup>4</sup>, and Class 4 (d)<sup>5</sup> for Zone C, and Classes 4 (a)<sup>6</sup> and 5 (a)<sup>7</sup> for Zone D.

In terms of building footprint this is proposed to be reduced with an increase in landscaping. There will also be an increase in car parking spaces. **Attachment I** also shows that the largest change is with regard to the height of the buildings where the height of most buildings is set to increase substantially, with the exception of building LS5 where there will be a decrease of one floor.

The increase in height of the buildings is likely to affect the findings of the EPS in terms of the landscape and visual assessment. Given that most of the proposed buildings are higher it is likely that the visual impact will change and the buildings may be visible from more places than was originally assessed.

In terms of impacts on air quality from traffic during the operation of the proposed Master Plan this would depend on the Annual Average Daily Traffic (AADT) changes. Although the Gross Floor Area is increasing by 7,940 m<sup>2</sup>, the AADT estimate is based on the net increase in Zone D (8,608 m<sup>2</sup>) since the support facilities in Zone C are unlikely to significantly affect trips to / from the site.

The GFA approved by PA/04523/10 (the full development permit) for LSI, LS2 and LS3 is 13,904m<sup>2</sup>. Currently, 8,679m<sup>2</sup> are rented out and a total of 356 employees work there. An additional 1,020m<sup>2</sup> are rented but not yet occupied. This translates into a current rentable GFA ratio of 70 per cent. The AADT on the increase in floor area is, therefore, based on 6,026m<sup>2</sup> (8,608m<sup>2</sup> x 70 per cent) since non-rentable areas (shafts, circulation space, ablution facilities etc.) are not considered as traffic generating.

<sup>1</sup> Food & drink and education

<sup>2</sup> Business and light leisure

<sup>3</sup> Education

<sup>4</sup> Assembly & leisure

<sup>5</sup> Food and Drink Establishments where cooking is allowed

<sup>6</sup> Financial, Professional and Other Offices

<sup>7</sup> Light industry



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As mentioned, Zone D is planned for offices and light industry. If one looks at the current mix of users in LS1, LS2 and LS3, 57 per cent are offices, 18 per cent are labs, and 25 per cent are offices combined with technical areas / workspaces, see **Table I**. Essentially, this means a 57 / 43 split between offices and light industry.

**Table I: Current uses**

Use	Area (m <sup>2</sup> )	Employee density
Office	4,950	17.1
Lab	1,537	53.9
Office / technical area / workshop	2,141	61.8

The AADT estimate is based on a 60 / 40 office / light industry split. Trip generation is based on surveys undertaken at several offices across the Maltese Islands; that for light industry is also based on offices (given the similar working pattern) but take into account the lower employee density as shown in **Table I**.

The estimated weekday hourly trips are shown below. Weekend trips are unlikely to be significant.

**Table 2: Estimated hourly trips**

Time	IN			OUT		
	Office	Light industry	Total	Office	Light industry	Total
05:00	0	0	0	0	0	0
06:00	5	1	6	0	0	0
07:00	33	7	40	4	1	5
08:00	60	12	72	4	1	5
09:00	23	5	28	20	4	24
10:00	9	2	11	12	2	14
11:00	6	1	7	8	1	9
12:00	9	2	11	13	3	16
13:00	17	3	20	13	2	15
14:00	7	1	8	9	2	11
15:00	8	2	10	7	1	8
16:00	2	0	2	27	5	32
17:00	3	0	3	47	9	56
18:00	0	0	0	15	3	18
19:00	0	0	0	3	1	4
20:00	0	0	0	1	0	1
<b>TOTAL</b>	<b>182</b>	<b>36</b>	<b>218</b>	<b>183</b>	<b>35</b>	<b>218</b>

The above translates into AADT as follows

$$((\text{Weekday ADT} \times 5 \text{ days}) + \text{Saturday ADT} + \text{Sunday ADT}) / 7$$

$$= ((436 \times 5 \text{ days}) + 0 + 0) / 7$$



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= 311 vehicles

The AADT for the net increase in floorspace is estimated at **311 vehicles**.

In terms of the impacts of the proposal on noise the EPS states that *until more detail is available of the activities and associated noise sources that will be generated during the operation of the Scheme, it is not possible to quantify noise impacts* therefore a comparison with the EPS cannot be made. However it is generally considered that construction impacts would be similar but because of the increase in GFA then noise from operational traffic would also increase.

I trust the above meets ERA's requirements.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. Xuereb".

Rachel Xuereb  
Director, Adi Associates



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Figure 1: Plans show approved and proposed Master Plan



Approved Block Plan  
Site Area (Life Sciences Park Phase II): 17.910 sq.m.



Proposed Block Plan  
Site Area (Life Sciences Park Phase II): 18.760 sq.m.



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### Attachment I: Comparison of approved and proposed Master Plan in GFA and height

Approved Data as per Outline Development Application - Masterplan [PA01179/10] for the area named Malta Life Sciences Park Phase II							Proposed Data for Outline Development Application - Revised Masterplan for the area named Malta Life Sciences Park Phase II							
Scheme Component	Location	Building No.	Floor Area Masterplan provision (sq.m.)	Use Class			Scheme Component	Location	Building No.	Floor Area Masterplan provision (sq.m.)	Use Class			
training facilities, child care, business centre and food services	Zone C	4 & 5	1605.0	Class 6 (a), Class 8 (a), Class 8 (b)			support facilities: child care, gym and catering service	Zone C	10	938.0	Class 2 (c), Class 3 (c), Class 4 (d)			
Enterprise Area	Zone D	6, 7, 8, 9	20560.0	Class I I			Enterprise Area	Zone D	4	3900.0	Class 4 (a), Class 5 (a)			
Total (Phase II) Internal Floor Space Excluding Car Parking Area (Gross): 22165.0							Total (Phase II) Internal Floor Space Excluding Car Parking Area (Gross): 30106.1							
	LS4	LS5 (Multi-purpose facility)	Substation	LS6	LS7	LS8	LS9	LS4	LS5 (Substation)	LS6	LS7	LS8	LS9	LS10 (Multi-purpose facility)
Building Footprint (m <sup>2</sup> )	1000.0	633.22	115.1	1379.7	2375.3	1886.0	1561.9	1000.0	219.3	1072.3	1072.3	1072.3	1072.3	295.0
Grand Total Building Footprint (m <sup>2</sup> )	8,951.22							5,803.54						
Grand Total Volume of buildings (m <sup>3</sup> )	130,255.40							143,996.18						
Area of Landscaping (m <sup>2</sup> )	10,224.33							15,167.77						
Total Car park spaces (no.)	434							604						
Building Heights	No. of floors			Maximum building height (m)			No. of floors			Maximum building height (m)				
	LS4	2			9.00			LS4	4			18.74		
	LS5 (Multi-purpose facility)	3			13.00			LS5 (Substation)	2			10.00		
	LS6	3			13.25			LS6	6			28.80		
	LS7	3			13.25			LS7	7			33.30		
	LS8	4			18.25			LS8	6			28.80		
	LS9	4			18.25			LS9	8			37.80		
	Substation	1			no specified			LS10 (Multi-purpose facility)	2			8.80		