

The Executive Chairperson  
Planning Authority  
St Francis Ravelin  
Floriana

Date: 20/10/2022  
ERA Ref: EA/00027/22

Dear Sir,

**Planning Ref.:** PA/02979/20  
**Description Proposal:** Excavate existing vacant site, construct multi-level basement car park with overlying supermarket at ground floor level including ancillary un/loading bay and bakery, offices Class 4A at first and second floors. The proposal also includes 26 residential apartments and a substation.  
**Location:** Site at Triq Dun Karm, Triq Jannara c/w, Triq Ħal Għargħur, Birkirkara

### **Environmental Impact Assessment Regulations (S.L. 549.46)**

Reference is made to the Project Description Statement (PDS) for the above application which was referred to ERA on the 13<sup>th</sup> September 2022. The PDS was reviewed and the proposed development was screened in terms of the Environmental Impact Assessment Regulations (S.L. 549.46).

#### ***ERA Assessment and Recommendations***

The proposal is for the construction of a multi-purpose development over 8 levels including underground levels. The proposal includes a 4-level basement car park; an overlying supermarket at ground floor level including ancillary un/loading bay and bakery; offices Class 4A at first and second floors; 26 residential apartments; a reservoir; and a substation.

The EIA screening in *Annex I* concludes that impacts of the development are unlikely to be significant to the point of warranting an EIA, in accordance with Regulation 15 of the EIA Regulations (S.L. 549.46), however, further assessment in terms of Air Quality is required.

ERA has reviewed the Air Quality Study at E-Apps Doc 230a and has included its feedback in *Appendix 1* hereunder. In this regard, ERA awaits the submission of a revised Air Quality Study. The outcome of the study is to also provide various mitigation measures which are to be duly incorporated into the mainstream development consent mechanism and mitigated by means of conditions and specifications (e.g. approved documents) in the development permit.

#### ***ERA Conditions***

ERA will be in a position to issue its conditions once the Air Quality Study is deemed satisfactory by ERA.

Yours faithfully,

Ryan Busuttil  
Environment Protection Officer  
f/Director of Environment and Resources

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*Disclaimer*

*The above comments are being issued without prejudice to any additional issues which are regulated by ERA through any relevant environmental permitting and, or compliance mechanisms, as well as to any environmental considerations that may be beyond the scope of the application under consideration.*

*The above assessment is based on the information provided to ERA in the application. Should it result that such information is incorrect, incomplete or misleading, or in the event of any omissions, or subsequent modifications, amendments or changes to the proposal, application and/or related submissions, the above assessment (including any favourable consideration, lack of objection, any proposed conditions or lack thereof, or any other equivalent stance, etc.) may need to be reopened to ERA's satisfaction. ERA shall not take responsibility for comments, assessments or judgments based on information that is incorrect, incomplete, missing or misleading, and which is only discovered after its assessment, nor for any environmental impacts resulting from developments which it was not specifically consulted on. Furthermore, ERA also retains the right to take additional action should the information provided, or any incorrect, incomplete, missing or misleading details, be tantamount to fraud.*

## Appendix 1 – ERA comments on the AQ Study for PA 02979/20 (EA 00027/22)

Ref	Page	Section/Table	ERA Comments
1	14	Table 1	The weighing room conditions should be between 45 and 50% as per EN12341:2014 and not between 45 and 55%. Reweighing of filters under correct conditions may be required. In either case kindly provide justification.
2	17	Section 2.1.5	Provide the AADT for the relevant streets/junctions for all scenarios. For example, the report does not mention the AADT to be generated by the project.
3	17	Section 2.1.5	The study refers to 2023 as the year when the project will be operational. Is this considered realistic?
4	21	Table 5	<p>The emission factor for PM<sub>10</sub> was assumed to be constant over the years, depending on the scenario. The contribution from combustion is due to a decrease due to an improved vehicle fleet. It is being noted that this is the lesser contributor to PM<sub>10</sub>. The mechanical contribution of road, tyre and break wear and resuspension will increase with the increasing number of vehicles. Kindly explain your workings and assumptions. It is being understood that the Handbook Emission Factors for Road Transport (HBEFA) does not have an emission factor for resuspension.</p> <p>Kindly confirm or change the emissions factors accordingly with respect to the adjusted vehicle fleet age.</p>
5	22	Section 2.2.5	Kindly explain how the background level was determined. For example, what is the source of the NO <sub>2</sub> background value?
6	22	Section 2.2.5	<p>If the Msida PM<sub>10</sub> concentration was used as a background concentration, this should be amended as it is not acceptable.</p> <p>The average background concentration for PM<sub>10</sub> should be determined using the Zejtun data for a five-year period, which is 26.3 ug/m<sup>3</sup>.</p> <p>The NO<sub>2</sub> background at the location of the project should be 17.3 ug/m<sup>3</sup>.</p> <p>For both PM<sub>10</sub> and NO<sub>2</sub> concentrations, 2020 and 2021 COVID years were excluded.</p>
7	25	Section 3.1	Provide the daily average PM <sub>10</sub> concentration as an appendix. The days affected from Saharan dust intrusion, if any are to be indicated. Including the information on which days were removed due to Saharan dust intrusion, if any. In this case we also request documentation, e.g. satellite images or model calculations as proof that these days were likely influenced by Sahara dust.
8	25	Section 3.1	Please specify the monitoring period dates.
9	25	Section 3.2	The annualisation factor has to be project specific. Kindly confirm if this is the case.
10	34	Table 11	What was the change in traffic, assumed to be, without the project between 2022 and 2023 and 2028? Normally, an increase in traffic of 1% per year is projected. Kindly explain.
11	46	Table 15	2023 should read 2035.

12	51 & 52	Tables 18 & 19	Please provide the baseline values in the table.
13	53	Table 20	Kindly clarify reasoning behind the “Temporary” and “Reversible” Effect and Scale.
14	53	Table 20	Resuspension is to be considered in the dust concentration calculations. Even if there will be an increase in EVs within the Maltese fleet, non-exhaust PM concentrations are expected to increase. The exhaust portion will still increase.
15	55	Section 5.4	Monitoring is not a mitigation measure. Further details on who shall implement such measures are required.
16	55	Section 5.4	Kindly explain how the formation of vehicle queues will be avoided.
17	57	Section 5.5	This is incorrect. Indicative measurements mentioned in Directive 2008/50/EC are not meant for temporary activity.