Our Ref: SCM010

12th April 2024

Mr Yves De Blick
Environment & Resources Authority
Hexagon House
Spencer Hill
Marsa, MRS 1441

Subject: PA/03109/23 – Smart City Malta Masterplan

1. Reference is made to your e-mail of 7th March 2024 addressed to Perit Magri on behalf of AP Valletta Ltd wherein you provided the following comments on the EIA Coordinator Statement dated 20th February 2024:

> *We take note of the information provided in the statement and kindly request the following additional information/clarifications from the coordinator, to conclude EIA screening for PA/03109/23:*
>
> - *With respect to waste management and the statement made in paragraph 5 (p3); kindly provide an overview of the measures proposed to manage such excavated material, taking into account the requirements outlined in the Construction and Demolition Waste Framework Regulations (S.L. 549.161). In line with the waste hierarchy and regulation 5(1) of the aforementioned regulations, the management of such excavated material should prioritise minimisation of material generated, re-use (where material is uncontaminated) and recycling to reduce quantities disposed of to the greatest extent possible.*
>
> - *With respect to visual amenity and the statement made in paragraph 9 (p3); kindly support this statement with representative photomontages, for comparison with the approved masterplan.*
>
> - *In terms of air quality (para 10, p3 and appendix I); kindly clarify whether the envisaged reduction in traffic generation by the revised masterplan (as compared to the approved development) is expected to affect the overall findings of the air quality study part of the 2008 EIA.*

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- *In terms of noise (para 11, p3); kindly clarify whether peak hourly traffic flows are envisaged to be affected by the proposed revisions to the masterplan.*

2. We address each of the above points separately below.

Waste Management

3. In terms of excavation waste, the increase in excavation as estimated in the EIA Screening Note of February 2024 was about 132% more than what was estimated in the EIA for the approved Master Plan. This figure has now been reduced as a result of a substantial reduction in the excavation of the AUM plot from an estimated excavation volume of 432,000m^3 to 275,000 m^3. The 132% increase has now been reduced to a 108% increase in the excavated volume compared to the 2008 figures. It is expected that this figure is further refined as more details for the different plots within Smart City emerge.

4. Given that the EIA Screening Note refers to an outline development application, no details are yet available as to the waste management arrangements that will be made once the separate plots are being developed. However, as a general guidance the following requirements of the Construction & Demolition Waste Framework Regulations (S.L. 549.161) will be adhered to:

- The Applicant will take the necessary measures to prevent the generation of waste across all stages of construction, as far as possible. Such stages include but are not limited to design, demolition, excavation, construction and finishing.

- The Applicant will prioritise the re-use of uncontaminated excavated material, both on-site and off-site and waste will be separated at source.

- The collection collection and transport of waste resulting from demolition, excavation and construction activities is carried out by means of an authorised waste carrier.

- The Applicant will obtain documentary proof that the waste is transferred to a facility that is authorised to accept such waste.

- The Applicant will make use of facilities or undertakings duly permitted by the Authority to carry out the treatment of construction and demolition waste in accordance with the Waste Regulations.

5. Additionally the following requirements will also be adhered to:

- The contractor will endeavour to separate demolition, excavation and construction materials or waste at source in order to facilitate the re-use of material and to prepare for re-use, recycling and recovery of waste, including but not limited to mineral fractions, metal, glass, wood and plastic waste. However,

where site specific characteristics do not allow, demolition, excavation and construction materials or waste may be separated at any establishment or undertaking duly authorised by the Authority. Demolition, excavation and construction waste can only be recycled or otherwise recovered at an establishment or undertaking duly permitted by the Authority.

- In order to facilitate preparation for re-use, recycling and other recovery operations, separated waste cannot be mixed with other waste or other materials with different properties, including during its collection stage.

- Any hazardous waste generated on site will be managed in accordance with the Waste Regulations.

6. As of 1st January 2026, any development application involving the construction of high-density residential developments serving sixteen or more units, will be required to include the submission of a pre-demolition audit prior to the issuance of the commencement notice of works. Additionally as of 1st January 2028 any developer submitting an application with the Planning Authority for a major development or high-density residential development serving sixteen or more units will be required to abide by recycling and reuse targets as set out in Regulation 9 of the Construction & Demolition Waste Framework Regulations (S.L. 549.161).

7. It is recommended that for each plot to be developed a Waste Management Plan is prepared in line with the above to ensure that the waste regulations are being followed.

Visual Amenity

8. It is noted that Perit Magri submitted photomontages as prepared by AP Valletta on 8th March 2024 and are therefore not being included in this note.

Air Quality

9. The estimated reduction in traffic generation as a result of updated traffic figures is likely to reduce the impact as assessed in the air quality study that was carried out in 2008, based on the methodology used at the time. The impact of the proposed changes to the development and the resulting impacts from these levels of traffic on air quality today cannot be quantified as the baseline will obviously differ.

Noise

10. A summary of the trip generation estimates are provided below. A total of three scenarios are presented:

- Scenario 1: 2008 TIS Addendum estimates;

- Scenario 2: 2008 TIS Addendum revision with local trip rates and internal trip assumptions; and

- Scenario 3: 2023 Master Plan estimates.

11. It is noted that the 2023 estimates include traffic generated by the existing office blocks at SmartCity.

12. The peak hour estimates are summarised below. These represent peak traffic generated by SmartCity and vary according to each scenario. Overall, none of the peak estimates for the 2023 Master Plan is higher than the estimates in Scenario 1. The results also suggest that the figures provided in the 2008 TIA Addendum (Scenario 1) were in fact an overestimation.

Table 1: Summary of Results: Peak hour estimates

	Weekday PM Peak			**Weekday AM Peak**			**Saturday Peak**		
	In	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Scenario 1	1,907	817	**2,724**	1,455	1,449	**2,904**	883	2,029	**2,912**
Scenario 2	1,727	228	**1,955**	770	1,705	**2,475**	381	614	**995**
Scenario 3	1,075	652	**1,727**	712	874	**1,586**	633	608	**1,241**

Note: Scenario 3 includes current flows.

13. We trust the above clarifies ERA's queries.

Yours faithfully

Rachel Xuereb
Director
Adi Associates Environmental Consultants Ltd