

BirdLife Malta's representation regarding PA 00676/22  
proposing multi-purpose sports village in Ta'Qali  
7<sup>th</sup> April 2022

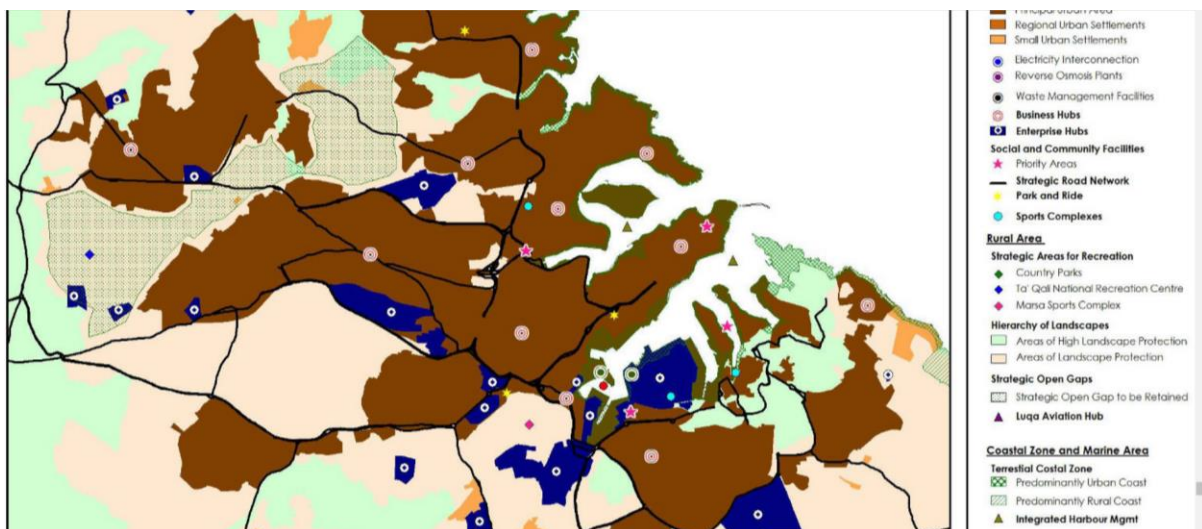
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BirdLife Malta is deeply concerned about the developments in question. It proposes to occupy 207,000 m<sup>2</sup> of agricultural land in ODZ and change the rural nature of the area as well as the land use and landscape dramatically.

The project foresees developing a number of facilities the need of which in the area is doubtful, such as the hotel and sport retails, which together with the car parking zone are not at all sports facilities and are to occupy a considerable area proposed for development. While the project envisages a large underground car parking, it must be mentioned that the site lies exactly within the groundwater safeguard buffer zone.

The site also borders a protected area and a bird sanctuary *Il-kumplex Ta' Qali*. Development of such a scale and nature will inevitably have permanent adverse impact on the protected area due to noise and light pollution, increase of human presence, car traffic and air pollution. The football pitch already existing in the area is being an immense source of light pollution and the proposed sports village is likely to contribute to this drastically.

According to SPED, the site falls under the Strategic Open Gap to be Retained (see the map below), therefore the proposed development contradicts SPED.



Source: SPED, 2015



Furthermore, SPED (Rural Objective 1) promotes sustainable rural development and diversification of activities within rural area to sustain agriculture and safeguard its distinctiveness by:

- protecting good quality agricultural land from development,
- controlling the cumulative effect of rural development.

In accord with the North West Local Plan/Policy NWAG 1, the site partly falls within the Area of Agricultural Value.

The Local Plan designates the area as a Major Recreation Area, however it is important to note that the SPED calls to ensure compatibility between recreational activities and between these activities and other land uses (Rural Objective 2), and in case of the development in question the compatibility is questionable especially given the size of the site proposed for the hotel, car park and retails.

**To conclude, the proposed multi-sports complex in a rural area of Ta'Qali requires thorough assessment of all possible impacts it can have on the surrounding environment during construction and most importantly operation, therefore the PDS should be filed followed by the EIA process.**