



Joint Feedback on the Terms of Reference for the Environmental Impact Assessment of the Proposed Multi-Purpose Sports Village at Ta' Qali (PA/00372/19)

07/11/2025

BirdLife Malta and Nature Trust would like to jointly submit the following recommendations for consideration in the Terms of Reference of the Environmental Impact Assessment for the proposed Multi-Purpose Sports Village at Ta' Qali, bearing ERA reference number EA/00023/25.

The Ta' Qali National Recreation Centre lies within the Rural Area Policies as defined by the Strategic Plan for the Environment and Development (SPED), which establishes guidelines for developments situated in rural areas. In line with Rural Objective 3 of this policy framework, we believe that a clear policy mechanism should be established to regulate the siting and design of such developments, ensure the implementation of appropriate environmental safeguards, address potential cumulative impacts, and include compensation measures aimed at enhancing the rural environment.

Footprint Assessment

The EIA should assess alternative options to the current site footprint and identify opportunities to reduce its overall extent. These alternatives should include design scenarios that exclude facilities not essential to the core function of the sports complex. The proposed project includes several components whose necessity within this area is questionable - such as the hotel, sports retail outlets, and garden centre - which are not sports-related facilities yet would occupy a substantial portion of the proposed development site. It is also worth questioning the need for a new garden centre, given that one already exists only a few metres away.

The Ta' Qali National Recreation Centre is governed by the Rural Area Policies of the SPED. These policies emphasise the need for compatibility between recreational activities and surrounding land uses (Rural Objective 2). In this case, the compatibility of the proposed development - particularly the hotel, car park, and retail components - with the rural context is highly debatable, especially given the extensive area they are projected to cover.

Traffic Impact Assessment

The proposed development is anticipated to exacerbate existing traffic pressures within the Area of Influence (Aol). A comprehensive assessment of the current traffic conditions in the Aol is therefore required, together with the identification of effective mitigation measures to minimise the additional impacts resulting from increased traffic volumes. The rise in vehicular movement is also expected to contribute to higher levels of air pollution within the area.

At present, Triq Durumblat serves as the only bypass route enabling commuters from Mosta and northern localities to avoid passing through central Mosta, and vice versa. This route already experiences significant congestion during peak hours, particularly in the mornings, as well as during weekends when sports or other large-scale events take place at the Malta Fairs and Conventions Centre (MFCC). The cumulative impact of the proposed development would likely worsen these existing conditions unless adequate traffic management and mitigation strategies are implemented.

Assessment of Flora and Fauna

The site lies adjacent to the Il-Kumpless Ta' Qali Bird Sanctuary, designated under the Environment Protection Act (Act I of 2016). Furthermore, the area currently comprises disused farmland, which may serve as an important habitat for avifauna. Accordingly, a comprehensive avifaunal assessment covering at least one full calendar year is recommended to capture seasonal variations in bird presence and habitat use.

In addition, a detailed ecological survey of the site's flora and fauna should be undertaken. We are aware of the presence of hedgehogs, western whip snake, leopard snake and the cat snake, within the site. In addition, bats are also known to frequent the

area. The assessment should therefore evaluate the site’s ecological value and identify potential impacts on these species.

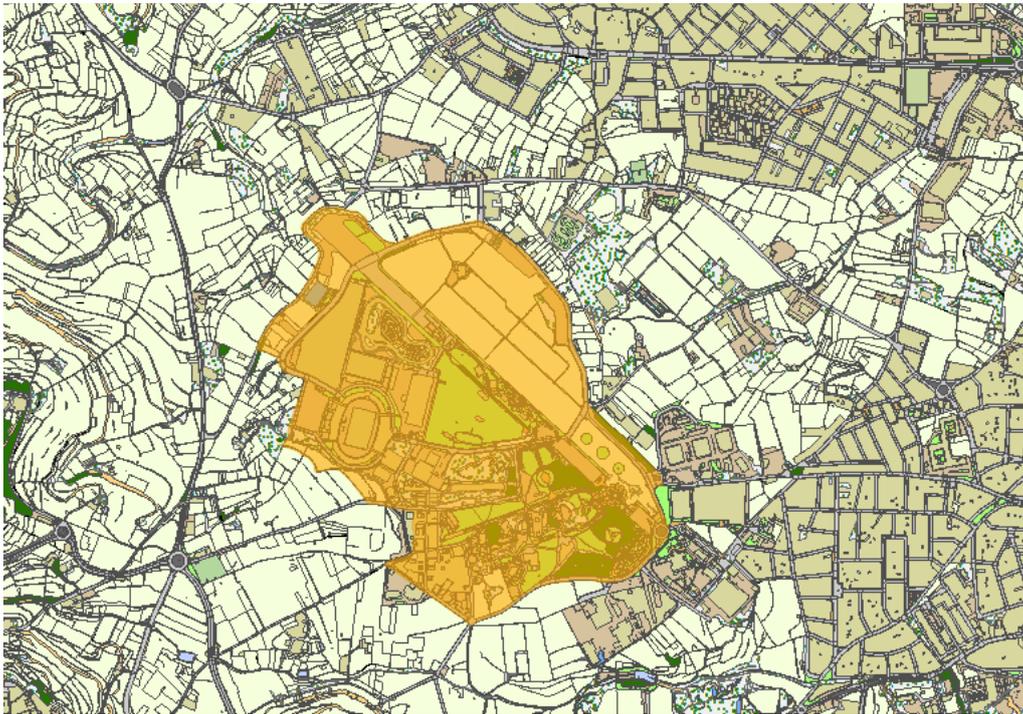


Figure 1: Il-Kumless Ta' Qali Bird Sanctuary (ERA Map)

Nature Restoration Law

The proposed development would permanently transform the site’s current use — from abandoned agricultural land and open space to an area dedicated exclusively to recreational purposes. Such a conversion of agricultural land to non-agricultural uses should be recognised as a major adverse impact, contrary to the assessment presented on page 57 of the Project Description Statement (PDS), where it is classified only as a “minor adverse” effect.

This area clearly falls within the scope of Article 11: Restoration of Agricultural Ecosystems under the newly enacted Nature Restoration Law. The law explicitly requires that “Member States shall put in place the restoration measures necessary to enhance biodiversity in agricultural ecosystems, taking into account climate change, the social and economic needs of rural areas, and the need to ensure sustainable agricultural production in the Union.”

Given this legal context, the site would be far more appropriately managed through restoration of agricultural ecosystems rather than through conversion to intensive recreational use. Measures such as reinstating low-intensity agricultural practices would not only align with the objectives of the Nature Restoration Law but would also enhance biodiversity by providing valuable foraging and breeding habitats for species

such as Turtle Dove (a migratory stopover species) and Greater Short-toed Lark and Corn Bunting (local breeding species).

Bird Friendly Infrastructure

- Layered green infrastructure that offers various heights and structures, such as tall trees, understory trees, shrubs, and ground cover. This type of landscape provides a range of nesting sites, perches, and hiding spots for birds.
- Throughout the operational phase of the project, care should be taken to minimise the risk of a cat colony being established on site.
- Surrounding vegetation near buildings can be reflected through the glass, resulting in bird strikes. A moderate approach to placement lies in planting vegetation further away from buildings.
- Glass should have protection for birds. The two main ways how glass protection against bird strikes can be incorporated are by installing glass panels with a frit pattern (with a 2" x 4" Rule) and placing glass behind some type of screening.
- Green roofs and walls which add value for birds may also be installed. Well-designed green roofs and roof gardens can become functional ecosystems, providing food and nest sites for birds.
- Installing nest boxes on site will provide an artificial but safe nesting place for breeding birds present on-site prior construction. When installing a nest box, it's essential to choose a design tailored to specific bird species you wish to attract. Different species have different requirements for entrance hole size, box dimensions, and mounting height.
- Water features which can be installed and with an added value of being bird-friendly are bird baths.
- To support local bat populations, we also recommend the installation of bat boxes on site.
- An efficient and ecologically friendly pest control system should be implemented on site. The use of pest control devices such as sticky insect tape and glue traps for rodents can have harmful impacts on wildlife. These devices inadvertently capture various insects that are essential food sources for birds and other fauna on-site. Additionally, birds and other animals, such as lizards and hedgehogs, may become trapped, leading to injury or death.

Light and Noise Pollution

A development of this scale and nature will inevitably have permanent adverse effects on the Bird Sanctuary and the avifauna currently utilising the Aol. The most significant

impacts are expected to arise from noise and light pollution, as well as from increased human presence, vehicular traffic, and air pollution. The existing football pitch in the area already constitutes a substantial source of light pollution, and the proposed sports village is likely to intensify this impact considerably.

A detailed lighting scheme should therefore be included in the assessment. All pathways should be illuminated only when necessary, using motion-sensor lighting that is fully cut-off and downward-facing to minimise light spill. We suggest avoiding white LEDs and use downlighters with full cut off and with CCT $\leq 3000\text{K}$. Lighting should be focused only on essential areas to minimise spillover. BirdLife Malta's 'Guidelines for ecologically responsible lighting' and ERA's 'Guidelines for the Reduction of Light Pollution in the Maltese Islands' should be consulted¹.

Invasive Alien Species

The proposed garden centre poses a potential source of Invasive Alien Species (IAS) introduction and spread. Preventive measures should therefore be established to minimise this risk, including strict control of plant imports and regular inspection protocols. A comprehensive monitoring and contingency plan should also be in place to enable rapid response in the event of an incursion.

Water and Energy Use

It is acknowledged that the project includes the installation of various technologies aimed at reducing the complex's overall energy demand. We fully support the implementation of such measures, including PV panels, solar water heaters, and heat pumps, which contribute to improving the project's sustainability profile.

It is important to highlight, however, that the site lies within the groundwater safeguard buffer zone. Given the expected high water demand for maintaining landscaped areas and turf, careful consideration must be given to sustainable water management. In this regard, we strongly support the installation of underground water reservoirs, which could help reduce dependence on groundwater abstraction and support efficient water reuse and rainwater harvesting practices.

Compensation Measures

The EIA should also incorporate a set of compensation and enhancement measures to offset residual environmental impacts. These should include:

¹ Crymble, J. (2020). Guidelines for ecologically responsible lighting. BirdLife Malta. <https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>.

Environmental Resources Authority. (2020). Guidelines for the Reduction of Light Pollution in the Maltese Islands' should be consulted. <https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf>.

- Habitat restoration initiatives, particularly those that support agricultural use in Ta' Qali, as identified in Policy NWTQ39 of the Ta' Qali Action Plan;
- Measures to reduce light pollution within the Ta' Qali area, especially in proximity to sensitive ecological zones; and
- The establishment of a collection and rehabilitation facility (or support to an existing one) for injured or stranded wildlife, including snakes, hedgehogs, and birds, to compensate and support adequate rescue and care capacity on the island.