

**ERA Ref.:** EA/00023/25  
**Description of Proposal** Proposed Multi-Purpose Sports Village  
**Location:** Flower Power site, Triq Durumblat, Ta' Xkora, Ta' L-Iskalun, Ta Qali, Attard  
**Subject:** Table with recommendations and ancillary reasoned justifications provided by the public, government entities, E-NGOs and relevant local councils, during 30-day public consultation on Terms of Reference, on any matters that they wish to see included in the EIA terms of reference.  
**Consultation Period:** 09/10/2025 – 08/11/2025

No.:	From	Comments
1	Energy and Water Agency  Dated 14/10/2025	<p>The following are comments for The Energy and Water Agency divided by considerations which relate to specifically and solely to energy and water management.</p> <p><b>Energy:</b>            EWA positively notes the integration of renewable technologies in this proposal and the efforts in ensuring an efficient use of energy through the inclusion of a building management system mentioned in section 3.3.4. With regards to section 3.2.5 Energy, Water &amp; Sewage, EWA however would like further clarification on the proposed use of fossil fuel (diesel) and suggests that green alternatives such as biofuels and electrification are considered instead.</p> <p><b>Water:</b>            Given that the proposed site exactly overlies the underlying groundwater gallery and lies within the Groundwater Protection Zone of the Malta Mean Sea Level Aquifer, particular attention should be given to safeguarding groundwater quality and ensuring the efficient use of water resources.</p> <p>Further consultation with the Water Services Corporation (WSC) is strongly recommended at the detailed design stage to confirm the appropriate arrangements for water supply and sewer connections, and to ensure that no risks are posed to the groundwater system due to the proposed installations and activities.</p> <p>Furthermore, EWA suggests the following considerations in regards to water conservation and good practices.</p> <ul style="list-style-type: none"> <li>• The installation of water-efficient fixtures (sports, hotel, retail, and sanitary areas) to minimise water demand on the public supply network.</li> <li>• The incorporation of an on-site greywater treatment system, allowing for the reuse of treated water for landscape irrigation and toilet flushing.</li> <li>• The provision of a dual plumbing system for toilet flushing, capable of utilising either treated greywater or harvested rainwater.</li> <li>• Landscaping to make use of low-water-demand species, preferably native or typical of Mediterranean climates, to reduce irrigation needs.</li> </ul>

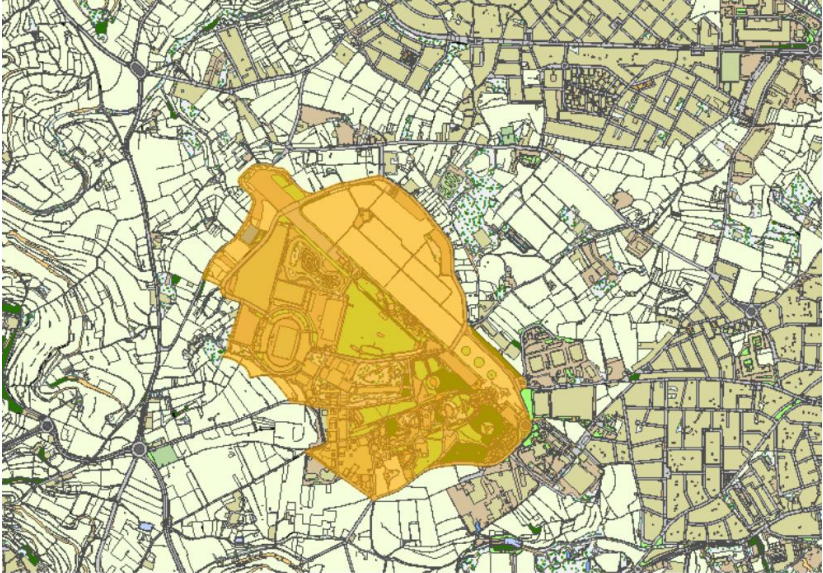
No.:	From	Comments
		<ul style="list-style-type: none"> <li>• The garden center area to be sealed, ensuring that no irrigation or surface water infiltrates into the ground, and that all runoff is directed to the proposed reservoirs.</li> <li>• The inclusion of stormwater management measures, such as oil/grit separators and filtration systems, especially for car parks and service areas, before any runoff enters the reservoirs.</li> </ul>
2	Occupational Health & Safety Authority  Dated 29/10/2025	<p>With reference to the public consultation in relation to the Terms of Reference for an Environmental Impact Assessment for EA/00023/25 pls. find OHSA's comments:</p> <p>The employer at this site shall ensure that:</p> <ol style="list-style-type: none"> <li>1. All work activities at this place of work comply with the requirements of Act XXXIII of 2024 and all relevant OHS regulations.</li> <li>2. One or more persons having the necessary aptitude, capabilities, competence and training shall be designated to assist the employer in undertaking the measures which are required to be taken in relation to the protection of occupational health and safety and the prevention and control of occupational risks, as per LN 36 / 2003.</li> <li>3. ALL work activities falling under one's responsibilities are covered by a suitable, sufficient and systematic risk assessment carried out as per LN 36 / 2003 and other relevant OHS regulations. Without prejudice to the legal obligations of an employer, this risk assessment shall, inter alia, refer to: <ol style="list-style-type: none"> <li>a) The measures to be taken against risks from manual handling of loads as per LN 35/2003.</li> <li>b) Protection against exposure to chemical agents including carcinogens at work as per LN 227/2003 and LN 122/2003 including but not limited to measures against inhalable dusts and metals.</li> <li>c) The measures to protect workers from risks from exposure to the sun.</li> <li>d) The required emergency prevention, preparedness and response arrangements including first aid and firefighting measures.</li> <li>e) Protection against physical agents at work including but not limited to risks from noise and vibration.</li> <li>f) Traffic management.</li> <li>g) Protection of workers from risks of electrocution as required by LN 44/2002.</li> <li>h) Personal protective clothing / equipment to be used by workers.</li> <li>i) Suitable welfare facilities to be made available for staff.</li> <li>j) The required health and, or safety signs and.</li> <li>k) Training and competence of workers to perform the assigned tasks.</li> </ol> </li> </ol> <p>This risk assessment shall also make reference to the necessary health surveillance that is required wherever there is revealed an identifiable occupational disease or adverse health condition related to the work involved OR the likelihood that a disease or condition may occur under the particular conditions of work, as per LN 36 / 2003 and other applicable OHS regulations.</p> <ol style="list-style-type: none"> <li>4. All work equipment complies with the relevant provisions of LN 293 / 2016, including where applicable, by ensuring that work equipment is duly examined by a competent person and a report of such examination is kept by the employer and (where applicable) also sent to OHSA and.</li> <li>5. Any intended construction related works comply with the relevant provisions of LN 52/2025 in particular:</li> </ol>

No.:	From	Comments
		<ul style="list-style-type: none"> <li>• Ensuring that a competent project supervisor is appointed for both the design and execution stages.</li> <li>• The preparation and implementation of a Construction Phase Health and Safety Plan prior to commencement of works.</li> <li>• The coordination of health and safety measures among all contractors and workers on site.</li> <li>• The provision of adequate welfare facilities, safe access and egress, and protection against falls and other site hazards.</li> <li>• The notification of the construction project to the OHSA as required by the regulations.</li> </ul>
3	Planning Authority  Dated 30/10/2025	With respect to email below, please note the following PA reply:  Any proposed development should follow the Ta' Qali Action Plan policy from a planning point of view
4	Environmental Health Directorate  Dated 31/10/2025	With reference to your email dated 9th October regarding the subject in caption, and following the review of the Project Description Statement, please be informed that the Environmental Health Directorate would like the following public health-related issues to be included in the Terms of Reference for this proposed development: <ol style="list-style-type: none"> <li>1. Air pollution impact assessment, including the necessary monitoring and mitigation measures on the surrounding area for:               <ul style="list-style-type: none"> <li>• Demolition, excavation, and construction activities</li> <li>• Emissions from heavy vehicles during the construction and operational phases</li> <li>• Emissions from the operational phase</li> <li>• Construction and operational traffic</li> </ul> </li> <li>2. Assessment of noise and vibration impacts, which shall include construction activities, operational traffic, and other operational activities. Monitoring and mitigation measures must also be clearly stated.</li> <li>3. Traffic Impact Assessment regarding the consequences of this project in the area of influence. Mitigation measures are to be clearly stated.</li> <li>4. Light pollution assessment, including mitigation measures.</li> <li>5. A Waste Management Plan shall be implemented. This should include impacts from waste generated during both the construction phase (e.g., excavated and construction materials) and the operational phase. It is important that a Construction and Waste Management Plan, enforced by the site project manager, is provided in detail. Details of monitoring and feedback mechanisms must be clearly stated and adhered to.</li> <li>6. Adverse impacts caused by heavy machinery used for this project shall be identified. Necessary monitoring and mitigation measures are to be clearly stated and adhered to. These should include the method used for refueling machinery.</li> <li>7. Adverse impacts caused by unsafe or inadequate storage, and improper handling of raw materials on site, including potential accidental spillage of hazardous fluids, fuel, and lubricants, shall be identified.</li> <li>8. A full evaluation report on the increased volume of sewage to be disposed of in the public sewerage system during the operational phase. The study shall clearly state whether the present sewerage system is adequate to cope with this increase in volume and confirm that it would not cause any overflows and/or blockages, which may pose a health hazard or nuisance to nearby residents, commercial premises, and the general public.</li> <li>9. A hydrology assessment should be made available. Such assessment must include:               <ul style="list-style-type: none"> <li>• Details of rainwater collection, storage, overflow, and usage</li> </ul> </li> </ol>

No.:	From	Comments
		<ul style="list-style-type: none"> <li>• Details regarding the use of second-class water.</li> </ul> <ol style="list-style-type: none"> <li>10. Details of the proposed sanitary facilities for workers must be provided.</li> <li>11. The provisions of L.N. 5 of 2006 regarding Legionella Control are to be taken into consideration in view of potable water systems within the entire project.</li> <li>12. Pools are to be registered with the Environmental Health Directorate as per the Swimming Pools Regulations, 2005 (L.N. 129 of 2005), as amended by L.N. 135 of 2008.</li> <li>13. Proposed discharge points from swimming pools that will be present on site shall be clearly indicated.</li> <li>14. A pest control management plan shall be in place for the site and its surroundings during the operational phase.</li> <li>15. The overall cumulative impacts of the development on the public shall be assessed.</li> <li>16. Details of proposed measures to prevent nuisances at all stages of the project within the area of influence must be provided.</li> </ol> <p>The EIA should also include a detailed description of the measures envisaged to prevent, minimise, and where possible, offset any significant temporary or permanent adverse health effects and nuisances on the area of influence and the general public. This should include details of proposed monitoring programmes and identification and detailed discussion of possible health effects of any residual impacts that cannot be mitigated.</p>
5.	<p>Superintendence of Cultural Heritage</p> <p>Dated 06/11/2025</p>	<p>In response to your email of the 9 th of October 2025, please find recommended Terms of Reference for a Cultural Heritage Assessment i.c.w. the Environmental Impact Assessment (EIA).</p> <p>1.0 Preamble</p> <p>As a consequence of the withdrawal of applications PA/00372/19 and PA/00676/22, the current EIA encompasses a pre-submitted application. The application pertains to a substantial development on ODZ land that is situated within the boundaries of Ta' Qali. The archaeological and cultural significance of the vast expanse of ODZ land that is being considered for development is also a concern. The proposed project will have a direct impact on the visual landscape, historical structures, and long-distance view of the historical mediaeval town of Mdina.</p> <p>The Superintendence has observed that the current pre-submission effectively proposes the same concept as that proposed in PA/00372/19 and PA/00676/22, with the addition of additional sports facilities in close proximity to the scheduled Torri ta' Cumbo. The archaeological sensitivity of the area and the long-distance view to and from the Mediaeval town of Mdina and the British town of Mtarfa were already the subject of cultural heritage concerns during the proposals of PA/00676/22. The Superintendence also recounts the photomontages submitted in PA/00676/22, and it was explicitly stated that the iconic and unobstructed view of Mdina and Mtarfa from Triq id-Durumblat will be entirely eliminated. An iconic perspective that is of significant historical significance.</p> <p>The above is stated in consideration of the concern that was already brought up in the last PA application, as well as in consideration of the masterplan drawing that are included in the current EIA.</p> <p>2.0 Scope and Definitions of the EIA</p>

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		<p>For the purposes of this document, cultural heritage is defined by Article 2 of the Cultural Heritage Act (2002) (as amended). This includes movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, palaeontological, and geological importance.</p> <p>The Cultural Heritage Act (Art. 2) specifically includes the landscape within the definition of cultural heritage.</p> <p>2.1 The study area will include:</p> <ol style="list-style-type: none"> <li>a) The immediate environs of the development site, with the site as viewed from along Triq Durumblat and It-Torri ta Cumbo.</li> <li>b) Viewshed of the development site as viewed from the long-distance views from and to Mdina and Mtarfa.</li> </ol> <p>2.2 In the context of this application, cultural heritage considerations may include:</p> <ul style="list-style-type: none"> <li>• Mdina and Mtarfa (Visual views).</li> <li>• Archaeological Evaluation</li> </ul> <p>The above cultural heritage definitions and considerations are not to be considered as exhaustive. The EIA must consider all other forms of cultural heritage, both known and unknown.</p> <p>2.2 The Environmental Impact assessment will:</p> <ol style="list-style-type: none"> <li>a) Identify impact of development on the visual value of the surrounding area.</li> <li>b) Assess the impact on the visual values of surrounding area and long-distance views.</li> <li>c) Propose appropriate mitigation to lessen impact on the visual impact especially on the long-distance views.</li> </ol> <p>3.0 Methodology</p> <p>In quantifying the cultural heritage assets within the study area, and assessing the impacts of the proposed development, the EIA will undertake:</p> <ul style="list-style-type: none"> <li>• A study of the possible negative effects the proposed interventions will have on the archaeological sensitivity of the area.</li> <li>• A study of the visuals of the area and the long-distance views, including photomontages from significant viewpoints, along Triq Durumblat, from Mdina and Mtarfa.</li> </ul> <p>4.0 Authorisation by the Superintendence of Cultural Heritage</p> <p>As per Cultural Heritage Act 2002 (as amended), any form of investigation or prospection required for the identification of cultural heritage (including excavation, field walking, topographic survey and remote sensing) may only be undertaken by the Superintendence of Cultural Heritage or with its written approval.</p>

No.:	From	Comments
6.	BirdLife Malta and Nature Trust Malta (Joint feedback)  Dated 07/11/2025	<p>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.</p> <p>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.</p> <p>Footprint Assessment</p> <p>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.</p> <p>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.</p> <p>Traffic Impact Assessment</p> <p>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.</p> <p>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.</p> <p>Assessment of Flora and Fauna</p>

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		<p>The site lies adjacent to the Il-Kumplex 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.</p> <p>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.</p>  <p data-bbox="618 1058 1066 1078"><b>Figure 1:</b> Il-Kumplex Ta' Qali Bird Sactuary (ERA Map)</p> <p data-bbox="432 1121 719 1145"><b>Nature Restoration Law</b></p> <p data-bbox="432 1193 2101 1329">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.</p> <p data-bbox="432 1374 2101 1437">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</p>

No.:	From	Comments
		<p>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.”</p> <p>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).</p> <p>Bird Friendly Infrastructure</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Throughout the operational phase of the project, care should be taken to minimise the risk of a cat colony being established on site.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Water features which can be installed and with an added value of being bird-friendly are bird baths.</li> <li>• To support local bat populations, we also recommend the installation of bat boxes on site.</li> <li>• 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.</li> </ul> <p>Light and Noise Pollution</p> <p>A development of this scale and nature will inevitably have permanent adverse effects on the Bird Sanctuary and the avifauna currently utilising the AoI. 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.</p>

No.:	From	Comments
		<p>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 <math>\leq 3000\text{K}</math>. 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 consulted.</p> <p><b>Invasive Alien Species</b></p> <p>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.</p> <p><b>Water and Energy Use</b></p> <p>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.</p> <p>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.</p> <p><b>Compensation Measures</b></p> <p>The EIA should also incorporate a set of compensation and enhancement measures to offset residual environmental impacts. These should include:</p> <ul style="list-style-type: none"> <li>• Habitat restoration initiatives, particularly those that support agricultural use in Ta' Qali, as identified in Policy NWTQ39 of the Ta' Qali Action Plan;</li> <li>• Measures to reduce light pollution within the Ta' Qali area, especially in proximity to sensitive ecological zones; and</li> <li>• 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.</li> </ul>

No comments received from the Public.