

Comments on PA /09387/17 for the Removal of soil for Archaeological
Investigation in Naxxar
7th February 2018

BirdLife Malta is herewith **objecting to PA/09387/17** for the Removal of soil for Archaeological Investigation in Naxxar and would like to bring to the attention of the Planning Authority the following points to consider dismissing the application:

- The justifications concerning the proposed development are unclear, and it appears that the developer in this case is simply speculating the land in question for future development. The removal of soil from this area would degrade the site possibly rendering it eligible for future applications or interventions which are not conformant with the site existing character and value.
- The need to undertake Archaeological investigations is in fact not credible, given also the representation filed by the Superintendence of Cultural Heritage on the 7th February which disdains the need for further investigations and actually lists the development as posing a threat to the archaeological value of this site, besides impacting the cultural landscape value of the area.
- The proposed development/intervention is located in an area scheduled as ODZ. Approving this development contradicts with the Strategic Plan for Environment and Development, 2015, which states that spreading of built-up areas led to “damage to natural habitats, wildlife and hydrological processes [...], soil erosion and soil sealing”. Under this policy, it has to be assured that rural areas are protected from further environmental destructions through developments. MEPA has in fact scheduled this site in September 2011 “to act as a development control mechanism”¹.
- The proposed intervention/development shall result in the removal of a valuable ecological element – soil – which is part and parcel for the very reason why the area is considered also as a site of scientific importance and an area of ecological importance according to MEPA¹. As part of the development, it is proposed that soil will be removed on a large scale. Soil removal destroys the natural habitat and leads to loss of biodiversity, this is not justifiable especially since the proposed development is located in Tal-Wej which forms part of one of the last open spaces between Naxxar and Mosta. This area serves as an important wildlife corridor and fragmentation disturbs flora and fauna from natural spreading and migrating processes. Tal-Wej furthermore contains a priority habitat under the EU Habitats Directive (Annex I habitat type 3170 Mediterranean Temporary Pond). Proposed development located in close distance to this habitat need to undertake appropriate impact assessments to assure full protection

¹ <http://www.maltatoday.com.mt/news/national/12909/mepa-schedules-tal-wej-area#.WmtsizKinFPZ>



from environmental impacts. The valley serves as a habitat to the Maltese painted frog *Discoglossus pictus pictus*, which is the only indigenous amphibian present on the Maltese Islands (<https://www.um.edu.mt/library/oar/handle/123456789/22088>).

- The removal of soil also is not conformant with MEPA's Rural Policy and Design Guidance (2014)², in particular policy 1.2D (Sections 1.2.1 and 1.2.3)
- Rubble walls are proposed to be demolished as part of the development, which leads to destruction of valuable microhabitats for various reptiles and insects within these walls. Furthermore, destruction of rubble walls contradicts with also MEPA's Rural Policy and Design Guidance, particularly Policy 1.2 H, which protects important features of the landscape (including rubble walls).
- The proposed development will produce and introduce disturbances arising from noise, vibration and light pollution during construction and operational phase impacting the natural environment at and close to the proposed development site negatively and irreversibly. Construction machinery would need to access the site and remove materials from it, and therefore the whole activity shall have a further residual impact on a wider footprint.

Due to the above-mentioned reasons, **BirdLife Malta objects to this proposed development and urges the Planning Authority to dismiss the proposal.** Furthermore it should be noted that the ecological appraisal, allegedly conducted for this site, has not been made public, and is not available on the Planning Authority's page concerning this planning application. We urge the Planning Authority to make such an appraisal public.

² <https://www.pa.org.mt/en/supplementary-guidance-details/file.aspx?f=268>