

Prof. Victor Axiak  
Chairman  
Environment & Resources Authority



Arch. Vincent Cassar  
Chairman  
Planning Authority

29 January 2018

**Open letter to Environment & Resources Authority Chairman  
and Planning Authority Chairman regarding development near Simar  
Nature Reserve**

With regard to development PA/09759/17 “Proposed demolition of dwellings. Construction of 5 apartments, a recessed floor and semi-basement garage”, we would like to highlight our concerns that the submitted plans are not in line with the Policy Xemxija Building Heights of the North West Local Plan (NWUS 5). The height limitations under this policy are four floors, however, proposed plans, which have been uploaded on e-Applications indicate that the proposed development exceeds these limitations by planning six floors for the apartments including one recessed floor.

This development is of particular concern to us since it is located in close distance to the Simar Nature Reserve, which is a designated protected bird sanctuary and a unique Natura 2000 site. The site was converted into a wetland reserve in 1992 by BirdLife Malta. The area now consists of managed wetland habitat of saline marshland and coastal lagoons, an overall rare habitat for the Maltese Islands thanks to which several birds are now breeding exclusively at Simar. Given its designation in 1992 at Xemxija Bay, the reserve has had at the time a row of buildings of two-storey height, on the side of the reserve, which have sustained little or no more development that impinged any further on the reserve. This however is now at risk.

In November 2016, we have already expressed our concern about the possibility that the area surrounding the Simar Nature Reserve in Xemxija could be subject to building development, which would have a negative impact on the viability of the reserve.

Apart from the fact that developments have to be in line with local policies, the immediate impact of construction and use of heavy machinery on the potential of

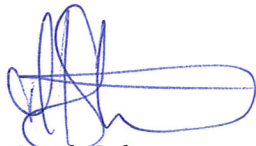
the reserve are of serious concern to us. Other long term concerns from more intensive development of the surrounding area next to the reserve include noise and light pollution generated from buildings impinging on the nature reserve, and heavier traffic flow due to more residents in the area.

In this regard, we urge the Environment and Resources Authority (ERA) and the Planning Authority (PA) to take an immediate position due to the sensitive nature of the Natura 2000 site of Simar, and if need be revisit the policies in question to ensure a buffer area to the Natura 2000 site is maintained.

BirdLife Malta insists that all Natura 2000 sites should be protected at all costs especially since Malta has the highest building density in the European Union. This would guarantee minimal impact on the priority habitats of the area, as well as maintain the necessary conditions that make the site a bird sanctuary.

We trust this will be taken into consideration when taking a decision over this Planning Application, even though this communication is being received beyond the stipulated representation period. We have not been notified of this proposed development and came onto realizing this is proposed thanks to concerns raised by residents in the area.

Kind regards,



Mark Sultana  
CEO  
BirdLife Malta



We belong to BirdLife International,  
the global Partnership of nature  
conservation organisations.