

## Comments on PA 03853/20 - Proposed reconstruction and extension of existing concrete quay, repair to existing arm, reconstruction of existing 2 slipways and replacement of existing concrete pavement

BirdLife Malta has looked at the planning application details. The scope and justification for this development are dubious, considering the fact that the current setup was probably developed illegally and without any permits, on scheduled habitats within a Natura 2000 site. The interventions planned on site are aimed to accommodate more boat traffic and human presence in an area which is sensitive for its flora, fauna and habitats, and which has suffered over the years from illegal development and inaction from enforcement authorities.

On the merit of the planning application itself, we would like to comment as follows:

Planned development is located within ODZ and adjacent to Marine Natura 2000 site MT150 *Zona fil-Bahar fil-Grigal ta' Malta*. It is also located within Natura 2000 site MT09 Ramla tat-Torri/Rdum tal-Madonna, and therefore should be subject to an Appropriate Assessment. *Zona fil-Bahar fil-Grigal ta' Malta* is a SAC of international importance hosting a diversity of *Posidonia* subtypes which have grown into vast meadows on the seabed. Equally important, the area provides vital habitat for seabirds colonies, namely Yelkouan Shearwaters which nest on the cliffs (the nearest colonies are found in L-Irdum tal-Madonna, Comino and Cominotto). MT 09 Ramla tat-Torri/Rdum tal-Madonna is a SPA for its seabird colonies and a SAC for its priority habitats which include sand dunes at White Tower Bay and isolated populations of the Burrowing Sand Cricket (*Brachytrupes megacephalus*)

Therefore the appropriate assessment needs to consider the following:

- a) Impact of development on sand dunes at White Tower Bay – including any modelling of beach wave dynamics and how these can impact the sandy beach
- b) Impact of development on any priority habitats and species which could be inhabiting the area of the jetty and the nearby beach
- c) Impact of development on sensitive marine habitats in the bay and nearby
- d) Impact of the development on neighbouring seabird colonies of especially *Puffinus yelkouan* which could result from particularly added noise and light pollution in the area.

The current lighting schemes in the area do not correspond to best sustainable practices and are a source of significant light pollution. For instance the Marfa jetty located in close proximity, has a number of installed high intensity LED floodlights angled poorly causing light spill; light is unnecessarily on during night hours instead of reducing it to required period of time when vessels load/unload



*Figure 1: Aerial view at night of Marfa jetty showing incompatible and insensitive lighting at night of the area*

Light pollution has adverse impact on seabirds, and the largest colony of Yelkouan Shearwaters nesting on cliffs of L-Irdum tal Madonna is most likely to be affected if the jetty will include any additional lighting or will be a source of further boat traffic/habitation of the area.

Apart from that, construction can also create significant noise in the area disturbing colonies of Yelkouan Shearwaters and having negative impact on their breeding behaviour. In this regard, we are of the opinion that the timing of the project should be considered thoroughly to avoid coincidence with the nesting period (which lasts until September).

Besides that, it is important to assess the risk of possible water pollution with construction waste and dust, especially taken into account Posidonia meadows and other marine flora and fauna which can be considerably affected by such contamination.

In view of all above mentioned, we believe the proposed development should be vetoed for the need of carrying out Appropriate Assessment. Specifically, the impact of light and noise pollution (both, during the construction and operational phase) on nearby seabirds colonies should be assessed, as well as the risk of water pollution during the construction.