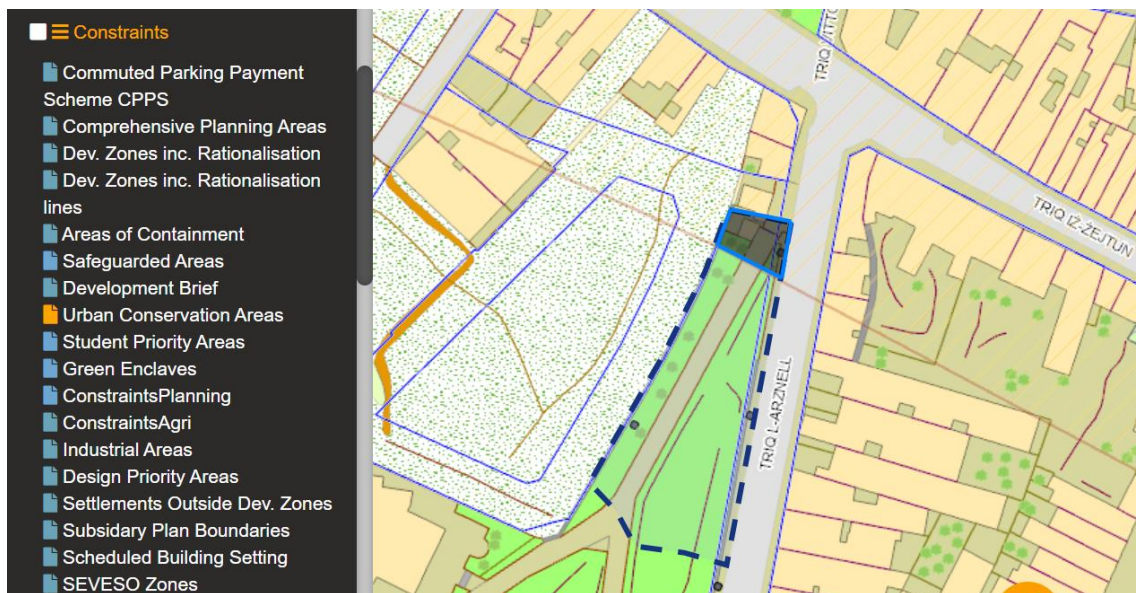


BirdLife Malta is objecting to the PA 08194/21 which is submitted by the Mayor of Marsaxlokk Stephen Grech. The development includes the removal of trees, demolition and excavation works, as well as construction of buildings and is to take up to 921m<sup>2</sup> of Marsaxlokk Primary School garden area.

At least 100m<sup>2</sup> of the site lies within the boundaries of the Urban Conservation Area, as can be seen on the Picture 1 below. Under the Policy MS02 of the Marsaxlokk Bay Local Plan, the “development proposals within the UCA will be required to preserve and enhance the character of the area” - this is not the case of PA 08194/21 which proposes to shrink the existing school garden, change the use of the site, as well as to increase the built-up area rather than contribute to the protection of the green enclave.



Pic.1 The area of the site falling within the UCA (<https://pamapservers.pa.org.mt/>)

The applicant is offering to construct a community centre which would host local council offices, health centre, post offices, library and a public hall. We highly doubt the need to further expand a built-up area, especially at the expense of a school garden, in a locality where there are numerous opportunities to find for such purposes a suitable existing building/s. Also it remains unclear whether the altered vehicular access is proposed as a part of the development, since the Planning Application Form denies it, while the headline of the PA contains the phrase “Works include the re-routing of the secondary access of adjacent St Thomas More College Marsaxlokk primary school”. The increase of traffic in the area adjacent



to the school is likely to have an adverse impact on air quality, traffic flow as well as to contribute to noise pollution.

City gardens and parks are key elements of the green infrastructure in urban areas. Although the planning application refers to the proposed area for the development as the “vacant site”, it is important to say that the area around the Marsaxlokk Primary School hosts one of few green spaces in the neighbourhood which has important functions in terms of mitigating pollution, improving air quality, and providing spaces for leisure, while creating a noise barrier and contributing to children’s wellbeing. The territory of Marsaxlokk Primary School is adjacent to one of the vibrant roads of the town (triq l-Arznell), and the garden abutting this road serves to reduce the negative impact of air pollution generated by traffic by the filtering effect of plant surfaces and foliage. The application suggests the felling of a significant number of protected trees, amongst which are *Cupressus sempervirens*, *Cercis siliquastrum*, *Punica granatum* and *Olea europaea*<sup>1</sup>. Primarily and importantly, all the trees present on site must be assessed for their conservation, ecological, aesthetic and educational value.

The paragraph 2.43 of the SPED (2015) states that “low provision of urban green space ... does not help to encourage healthy lifestyles”, while listing the following mitigation objectives:

- Urban Objective 3.7 calls to protect and green the open spaces “which contribute towards the character and amenity of urban areas, reduce soil sealing and support biodiversity with a view of developing ecological corridors”;
- Urban Objective 3.8 focuses on “retaining and seeking to upgrade existing sports facilities, public gardens, playgrounds and other public open spaces in urban areas”.

The proposed development fully contradicts the above clauses.

School grounds are increasingly recognized as an integral part of the educational process. Green school grounds have the potential to promote academic achievement through hands-on, experiential learning and by enhancing the cognitive and emotional processes important for learning. A growing body of research recognises that such spaces help students focus attention and regulate behaviour, enhance attitude and engagement with school, and support creativity. For instance, a recent Australian paper<sup>2</sup> argues that the access to green space, such as parks, trees, shrubs, and grass is linked to children’s healthy development, particularly contributing to their study performance, while exposure to traffic pollution, on the other hand, has detrimental effects on children’s learning outcomes. Another international study<sup>3</sup> also found an improvement in cognitive development in primary school-

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<sup>1</sup> Trees and Woodland Protection Regulations, 2018

<sup>2</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0013935121006198?dgcid=author>

<sup>3</sup> <https://www.pnas.org/content/112/26/7937>



aged children associated with surrounding greenness, particularly with green spaces at schools. The results of the research<sup>4</sup> undertaken recently in Barcelona demonstrate the need to protect and expand green areas around schools as such contributing to children's mental and physical health.

As part of our latest Erasmus + project Teach, Inspire and Protect (<https://birdlifemalta.org/environmental-education/teach-inspire-and-protect/>), BirdLife Malta is looking at school grounds and teacher attitudes to outdoor teaching (<https://www.youtube.com/watch?v=4bMMENlqDFg>). It is clear that educators believe in the benefits of green spaces and outdoor learning and that there is an increasing interest in nature-based learning in their practice. However, the physical aspect of school design is not moving in the same direction as the educational philosophy that values connecting children with nature. As children's lifestyles move indoors, schools can play a crucial role in re-connecting the young generation with nature through outdoor learning.

For the above reasons, ***BirdLife Malta is fully objecting to the proposed development.*** We believe that there is no justification for occupying the area under the school garden by such a massive development; such green spaces should be safeguarded and enhanced as the core elements of green infrastructure.

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<sup>4</sup> <https://www.sciencedirect.com/science/article/pii/S0169204620315036>