



BirdLife Malta's representation regarding PA 07577/21

18th January 2022

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The application in question aims to restore rubble walls and install timber gates in a Special Area of Conservation and a Specially Protected Area. The rubble walls, as they are, constitute important habitat and also host a number of flora and fauna species that might be impacted should works be permitted. The rubble walls are protected under the North West Local Plan which states that they are an important habitat as well as are of vital importance in the conservation of the soil and water. Therefore, any alterations to traditional rubble walls should be approved only after thorough assessment of potential impact on established community of species. The Public Application Form states there will be no alterations/demolition of rubble walls during this development which appears to be not correct information taken the development aims specifically at reconstruction of existing rubble walls, this should be revised accordingly.

The area is in general a pristine area which we are of the opinion that it requires no interventions. Such works instil doubt over speculation of this area for future development and change of use. Should this give room to further development, this might be in conflict with the site's value as a SPA site. Additionally we would like to mention that under the Policy NWLA 2 of North West Local Plan, Coastal Cliffs are considered as an Area of High Landscape Value meaning that the integrity of this landscape is a significant issue worthy of special protection and any adverse impact imposed by unnecessary development should be avoided.

In any case, ERA should scrutinise this application in its planning and operational stage for due nature permits.