



## BirdLife Malta's comments on the proposed Gozo Rural Airfield, Xewkija

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BirdLife Malta has analysed the documents presented online for public consultation with regards to the proposed Rural Airfield in Gozo, Xewkija. We would like to raise some concerns and contribute with our feedback which can be found below.

Firstly, it should be noted that an almost double extension of a runway (445m) is of concern since it will be done at the expense of undeveloped land. The total area of the site stands for 76,000 m<sup>2</sup>, out of which more than 10,000 m<sup>2</sup> shall be subject of a hard surfacing and more than 60,000 m<sup>2</sup> is said to be relevelled. Some landscaping and surfacing works (namely Aprons 2, 3 and 4) fall widely outside the area designated for the airfield under the Gozo and Comino Local Plan. Therefore, despite what is said in the PDS, the project is not fully aligned with the local plan policies.

The potential impacts arising from the increased traffic are not highlighted enough, and the issue of car parking seems to be tackled just nominally. The PDS does not mention any figures regarding the expected increase in the traffic flow and its potential impacts on the surrounding environment during the operational phase, only briefly referring to "a limited increase in vehicle parking requirements" and proposing the utilisation of the nearby roads for this purpose, which is not a sufficient solution. The issue of traffic should be given special attention, since we are talking about Gozo whose rural nature and low traffic levels and hence better air quality are vital to preserve. A transport impact assessment should be conducted accordingly.

Another issue not covered in the PDS and so remaining a concern is the waste management. If the removed top soil level from the releveling works is expected to be reused to some extent on agricultural land, the further management of an excavated rock material (which is said to be 54,000 m<sup>3</sup>) is not mentioned. Additionally, the PDS states that "during the operational phase, there will be no increase of waste resulting from the proposed operations". Given the nature of the project, as well as the passengers influx, a waste management plan shall include the operational phase of the development.

Another highly concerning issue is the impact of the airfield operations on avifauna, specifically from the increased light and noise levels. Although we noted the intent to keep the light pollution levels low, given that the site is located in ODZ and in proximity to seabird colonies in Ta'Cenc cliffs we would like to emphasise the need to rely on best available practices when designing the lighting scheme, such as Guidelines for Ecologically Responsible Lighting. One of the largest colonies of Scopoli's shearwaters in the Maltese Islands is located less than 2km distance from the airstrip, while the routes of the aircrafts are expected to lay in immediate vicinity of the cliffs where seabirds nest (as seen on Figure 7 of the presented study of the possible impacts on avifauna). The study argues that the increased light pollution levels will not impact seabirds since the airfield cannot be seen from the cliffs side and the lights will be directed downwards or northwards. However such a statement is very inaccurate. Sky glow does have



an impact on birds arriving back to colonies from the sea, as well as causes juvenile seabirds to be stranded during the fledging period. BirdLife Malta collected stranded juvenile Scopoli's shearwaters from the main road next to the Heliport in past years, and as far inland as the Gozo Football Stadium, as a result of the sky glow by such infrastructure. We suggest that the environmental impact on avifauna arising from increased light pollution should be analysed in more detail and relevant mitigation measures proposed.

Furthermore, the study mentioned earlier states that the noise levels are also not expected to be of concern in terms of impact on bird species, namely seabirds. However, as said before, the routes of taking off/landing aircrafts are such that they can cause major disturbance for the shearwater colony at Ta'Cenc cliffs, especially given the low anthropogenic presence and noise levels at present. The number of trips are said to be less than 15 per day, however even 14 trips can cause a significant increase of human disturbance, specifically noise and vibrations. We suggest further assessment of the potential impacts on shearwater colonies in terms of noise followed by sufficient mitigation measures proposed. Given that the closest residential units are located within 300m distance from the site, the impact of increased noise on human receptors should be evaluated separately, as well as social impact arising from it.

Although the Bird Sanctuary, in the boundaries of which falls the proposed extension of the airfield, is called in the PDS a nominal environmental constraint, we believe that mitigation measures in relation to the development of this area should be considered. This is especially relevant in the context of loss of habitat for a number of breeding birds (such as Greater Short-toed Lark – an Annex I species). Further assessment of the impact of the airfield operations on migrating and breeding birds (including potential strikes) should be prepared as a part of the Environmental Impact Assessment process.