



BirdLife Malta's representation on PA 02977/22

Ramla Masterplan

02nd June 2022

BirdLife Malta would like to express our highest concerns with regards to the embellishment project for Ramla Bay initiated by the Ministry for Gozo.

The site for the proposed development is located within ODZ land and suggests to occupy more than 1700 m² including through surfacing; it also lies in the Area of High Landscape Value, Area of Ecological Importance and borders the Special Area of Conservation *MT0000005 L-Inħawi tar-Ramla* which is a part of Natura 2000 network.

Furthermore, the development is going to take place on the protected beach *Ir-Ramla l-Ħamra*. This bay is known for hosting various habitats and species of plants and animals, as well as being one of few nesting places for Loggerhead turtles in Malta. Turtles generally are extremely sensitive to light pollution, while the proposed project can imply the increase both in light and noise levels. Any light spill on the Special Area of Conservation is not acceptable, since it can have detrimental effects on the ecology of the site, with particular risks for the sea turtles as well as migratory birds. Therefore, we strongly recommend relying on best available practices, such as the Guidelines for Ecologically Responsible Lighting¹. When it comes to the ways of water run-off collection and disposal, the application form states "land/sea" which is ambiguous and requires clarification given the adjacent SAC and the proximity to the marine SPA (*MT0000112*).

Additionally, the scheme is located within the scheduled Buffer Zone for the Remains of a Roman Villa (Class A level of protection), therefore, we would like to mention that without thorough consideration the proposed works can compromise the context of the area while the aim should be preserving it. It should be noted that in accord with the Management plan for the adjacent SAC *L-Inħawi tar-Ramla* "The area's cultural heritage will be protected from human interference, and exposed historic structures will be protected from the elements". Furthermore, the management plan declares that "tourism and outdoor recreational activities practised in the area will be managed in harmony with the conservation needs of the site".

Given the sensitive location of the proposed project, careful evaluation and rigorous assessment of the potential risks and impacts on the environment should be done before any decision is taken.

BirdLife Malta reserves its right to make further comments, recommendations, and observations with regards to such development.

¹ <https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>