

BirdLife Malta's representation on the PA 03071/22

To demolish existing two disused farms and construct tourism accommodation (Class 3A) including ancillary facilities plus other additions and alterations

01st June 2022

Hereby, BirdLife Malta would like to provide our feedback with regards to the above-mentioned development which raises wide environmental concerns.

First of all, the proposed development is located Outside Development Zone and exactly in the middle of a designated Bird Sanctuary, an Area of Ecological Importance, Site of Scientific Importance and a Special Area of Conservation (Natura 2000 site MT0000014) as seen on Figure 1.



Figure 1. SAC Il-Ballut ta' Marsaxlokk, Marsaxlokk and the boundaries of PA 03071/22. Source: PA Mapserver

According to the Marsaxlokk Bay Local Plan, the whole Delimara peninsula is designated as a Country Park, whose rural character should be retained. In line with the local plan (policy MD01) “the greater part of the Delimara Peninsula, as defined on the Policy Map, will be designated as a National park where priority will be given to conservation, protection and improvement of the natural heritage. In this location, positive provision will also be made for recreational uses consistent with this objective. Limited commercial development related to the needs of park users will be considered. Other uses likely to have a harmful or conflicting impact will be refused”. Furthermore, policy MS08 of the local plan states: “New residential development in the Rural Hinterland, Delimara Peninsula or other stretches of open countryside will not be allowed”.

The development in question is not aligned with SPED:

- Rural objective 1 urges to protect good quality agricultural land from development and control cumulative effect of development in rural area;



- Coastal objective 1 calls to designate a predominantly terrestrial rural coast to encourage the continuation of traditional agricultural use, to restrain mineral extraction from extending towards the coastline.

The proposed tourist accommodation is likely to become an additional source of light and noise pollution in the sensitive area of Delimara peninsula. Any light spill on the SCA is absolutely unacceptable.

The development is going to take up almost 4,000 m² of what predominantly is agricultural land. The loss of such a valuable resource is considered to be of major adverse impact and must not be encouraged. Apart from that, the development of this scale and nature can negatively impact the geomorphology of the coastal area which is the area of protected landscape; and also can potentially cause a damaging effect on the protected marshland (Level 1) due to impact on geology of the site. The site falls within the so called catchment area and therefore puts the wetland at risk of pollution both during the demolition/construction and operational phase. In addition to this, the site borders the buffer zone around the Tas-Silg Archaeological site.

The area of Delimara peninsula is an important habitat for a number of animal species (such as endemic Maltese wall lizard) also hosting important plant communities which can be affected by the increased human presence (particularly, trampling). Besides that, the peninsula is a vital stopover for migrating birds, such as herons, waders, marsh harriers etc. Therefore, the impact on ecology is expected to be of high concern, especially if taking into consideration the cumulative effect of developments (such as Power station operating in the vicinity of the site; approved redevelopment of Delimara Bay Hotel PA/02767/16; PA/08894/20, etc.).

BirdLife Malta objects to the proposed development, because it contradicts the SPED, local plan and ODZ policies, proposes to occupy valuable agricultural land and is likely to have a detrimental effect on the ecology and rural integrity of the site.