



BirdLife Malta's comments on PA 03351/22

Rehabilitation of historic building, including internal and external alterations

Siggiewi

01st July 2022

BirdLife Malta would like to provide our feedback with regards to the PA 03351/22 proposing the rehabilitation of a historic building, including internal and external alterations in Siggiewi.

The development is located in the middle of a very sensitive area, specifically the area benefits from a number of designations:

- Natura 2000 site SAC-SPA L-Inħawi tal-Buskett u tal-Girgenti;
- Area of ecological importance and Site of scientific importance;
- Area of High Landscape Value;
- Bird Sanctuary;
- Special Protection Area of a national level;
- Tree Protection Area.

The site proposed for the development lies in the ODZ and occupies the Area of Agricultural Value as in line with the North West Local Plan (Policy NWAG 1), therefore it is absolutely crucial not to favour any further encroachment onto the valuable agricultural land.

Buskett Gardens, within the boundaries of which the development is located, hosts a number of animal and plant species and one of few green afforested enclaves in the Maltese Islands. Buskett is also an important stopover for migratory birds and a habitat for resident avifauna species. The place can remain acting as such as long as the habitats therein remain protected and as long as disturbances from various human activities remain sustainable and controlled.

To this regard, any residential development within or in close proximity to Buskett may pose a risk during both construction and operational phases. While it is understood the area may be privately owned and with a number of existing structures, nonetheless caution needs to be practiced over what activities shall be permitted as part of the proposed planning application.

Being located within a N2K site, the Environment and Resources Authority should be in a position to vet the requirement of any nature permits for activities within the N2K site, safeguarding such to not be detrimental to the site's designations mentioned above.

With respect to such it is important that:



- Any lighting of the site during the construction phase is minimised and kept to a minimum.
- Lighting scheme should be designed and vetted in accordance with sustainable standards¹, such that this does not introduce any additional light pollution to the area.
- Noise pollution, is likely to have a negative impact on the ecology of the site, and should therefore be quantified and minimised for both constructional and operational phases of the development. Exceptional noise during peak migratory periods of birds of prey (September/October) and breeding periods (March to June) should at all costs be avoided to maintain the site's significance as a Bird Sanctuary.
- If necessary noise mitigation measures should be considered as part of the final design of the development.
- Strict controls should be imposed on the operational aspects of the development such that no future speculation or use of the site would turn the venue into an entertainment area or a tourism accommodation area with the likelihood of either higher occupancy or even with events organised on site generating light and noise pollution to the detriment of Buskett's ecological functions.

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