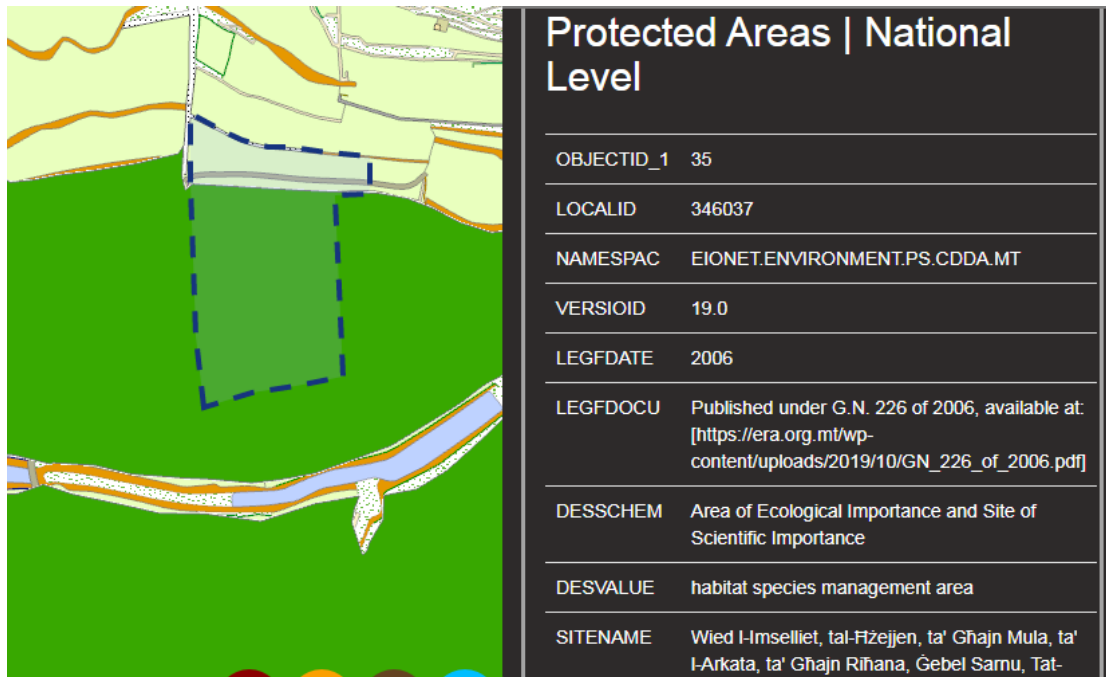


Objection to PA 5895/22 Bidnija sheep farm to turn into commercial  
 hospitality venture with Class 4B shop  
 28<sup>th</sup> October 2022

BirdLife Malta strongly objects to the mentioned development for the following reasons:

The development is located Outside Development Zone. It falls widely within the protected area: Area of Ecological Importance and Site of Scientific Importance designated under GN 226 of 2006 which granted this status due to the importance and rarity of valley and freshwater habitats in the area.



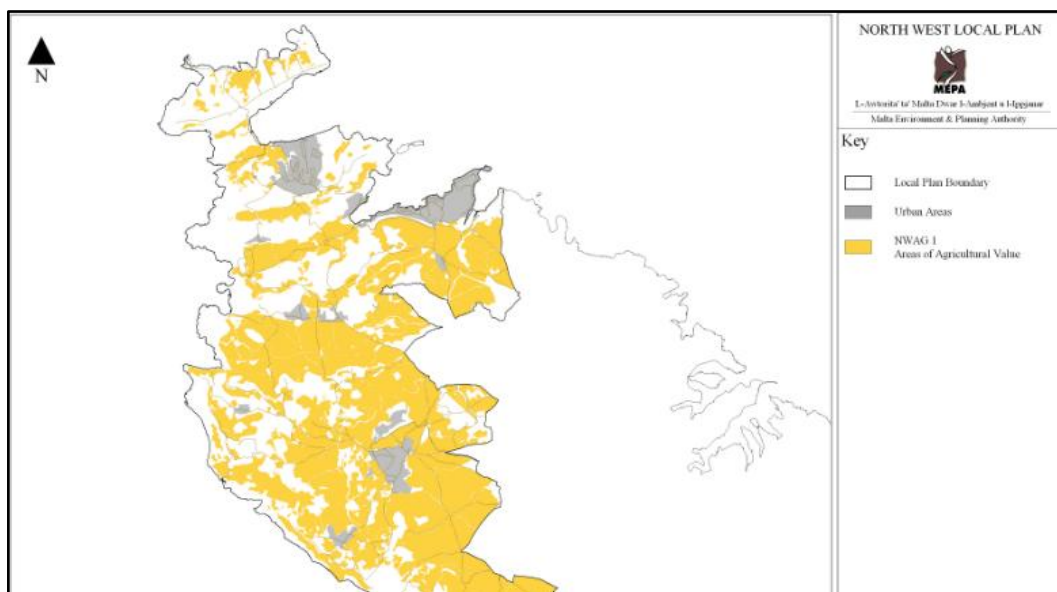
Picture 1. Area of Ecological Importance and Site of Scientific Importance and the boundaries of PA 5895/22. Source: PA MapServer

The area is an ecologically important site, being part of Wied l-Imselliet/Ghajn Rihana valley system which is one of a few places that holds a freshwater stream for a great part of the year including the summer months. Accordingly, this area is a refuge for various wildlife from aquatic insects to aquatic flora as well as serves as a nesting place for a number of bird species such as the Common Moorhen and the Reed Warbler. During migration, the area acts as a stopover for a number of migratory species, holding various water-logged pens and extensive reeds which are a refuge for birds. This site, in fact, merits stronger protection rather than speculation and the current structure on site which is being proposed for a change in use and further expansion is a travesty in the application planning policies for commercial aims.

PA 5895/22 contradicts a number of policies, such as the Rural Policy Design Guidance (RPDG) (2014) in sections 2.2; 2.3, 2.9; 4.2; 4.3; 4.4; 8.1.F. The application does not contain specifications as regards to the exact areas for retail outlet, dedicated floor space etc., therefore it is impossible to assess whether this goes in conflict with relevant provisions under the RPDG. Policy 4.4 does not allow any external ramps to be built for the basement level, however the drawings do not provide any information on that, as well as no details of the design of the animal enclosures. Policy 2.9 which allows the height of the rubble walls and gates of no more than 1.2m above existing soil level, the development in question will breach this. Neither vehicular access, nor parking spaces are allowed on a protected area and in line with RPDG Policies 4.2 and 4.3, however the applicant proposal implies both which is unacceptable.

The development also contradicts SPED (2015), particularly the Thematic Objectives 1 and 6, and Rural Objectives 1, 3 and 4 which stress on the need to protect the limited rural areas by ensuring that they are not exploited by not legitimate or necessary uses.

In line with the NW Local Plan, the site falls within an Area of Agricultural Value, therefore, the proposed uses of the area pose risks to further degradation of agricultural land both during construction and operation.



Picture 2. Areas of Agricultural Value. Source: NWLP

According to the Policy 8.1.F (RPDG, 2014), the Authority will uphold a general presumption against development which is likely to have an adverse impact on protected areas which is evident in the case of this Planning Application. Such a policy seems to have been over-ridden in the decision-making process of the original sheep farm proposal.



The doubtful approval of a sheep farm in this area as per PA 7946/18 has evidently been filed with the intent to transform this into an agrotourism facility, complete with a commercial outlet and parking spaces as per the current application. The impacts relating to the approval of the current application can already be anticipated, which shall lead to further degradation of the valley.

The commercial activity at the site shall bring about an increased number of vehicles to the area which is expected to impact the access path which runs along the watercourse. In time we have been accustomed to see such paths asphalted and concreted over to accommodate increasing traffic. Such is expected to have an impact on the water-course for which the area is designated as a site of ecological importance. Other associated impacts with increased traffic, include increase noise and increase spill-over and trampling in the area surrounding the development.

The current development on site already boasts a roof-top area which is likely to be opened up for entertainment with the current application. This shall introduce light and noise pollution in an area which should be pristine, and shall also open up further possibilities for nocturnal entertainment in this area bringing in an element of disturbance, which is incompatible with the site's ecological importance irrespective if during the day or night.

Given the history of the site and its proposed use, BirdLife Malta not only is objecting to this development, but is also demanding the Planning Authority to take all necessary action to remove the current structures on site and return the area to its former state. The latest application shows the intent from the developer to step-by-step transform what was once an agricultural field into the intended use through a two-step application process, just a few years apart.