



## **BirdLife Malta's objection to the PA 4350/23**

28th July 2023

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BirdLife Malta has analysed the documents present on EApps in relation to the PA 4350/23 (including the documentation relating to the initial PA 4744/15) which proposes an installation of a jetty in Armier Bay and is associated with the Palm Beach Resort. We would like to file our objection with regards to this development based on the reasons explained below.

The applicant is proposing an installation of a floating jetty during the tourist season. The jetty is to be placed right in the middle of Armier Bay which already is becoming a subject of some questionable development proposals, including the submitted PA 6588/22 (internal and external alterations to Baia Beach Club) which is awaiting recommendation at the moment.

The area of Armier Bay is gaining protection from several designations:

- + Protected beach;
- + Area of Ecological Importance and Site of Scientific Importance (*Għaram tar-Ramel fl-Armier, limiti tal-Mellieħa*);
- + Marine N2K site (MT0000112; MT0000105)

Considering the developments already present in the area, as well as the presence of seabird colonies, major concerns are associated with the increased light pollution which can be caused by this jetty. This area is frequented by the protected Yelkouan shearwaters who colonise the nearby cliffs of Rdum tal-Madonna and Comino. These birds are nocturnal and are very sensitive to light pollution. Armier is already known to be one of the light-induced grounding hotspots for seabirds, therefore all the measures should be taken to reduce existing lighting levels and prevent any additional light pollution as per Strategic Plan for Environment and Development (2015) and Development Control Design Policy, Guidance and Standards (2015).

Generally, such a jetty is considered to be not justified at the bay where there is already an opportunity for the boats to safely enter. Importantly, the operation of a jetty is expected to compromise a designated swimming zone, reducing it and causing additional disturbance/inconvenience to the public due to increased marine traffic. The jetty is not compatible with the surrounding environment and will block the view of the sea. The protected beach should remain free from any additional harmful interventions even if those are of temporary nature.