

BirdLife Malta's comments on the PA 1721/23 Upgrading of existing drag strip for international events

Hal Far, Birzebbuga
22nd September 2023

BirdLife Malta has analysed the documents present on EApps with regards to the development proposal in question. Based on the information provided we would like to submit our feedback for the Planning Authority's consideration.

The scheme has a footprint of more than 100, 000 m² (as said in the Public Application Form) and is located within almost immediate proximity (in the closest point the distance between the drag strip and the protected area is about 120m as can be seen on Figure 1) to the Natura 2000 sites :

- Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Bengħisa, SPA MT0000033;
- Rdumijiet ta' Malta: Ir-Ramla taç- Ċirkewwa sal-Ponta ta' Bengħisa, SCI MT0000024.

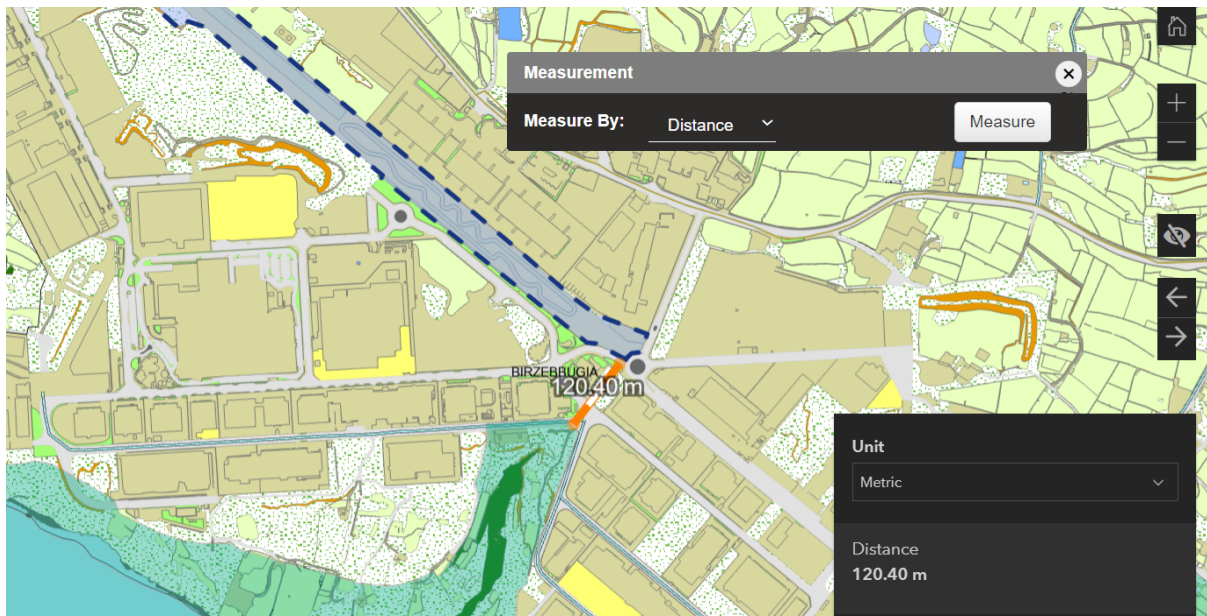


Figure 1. Closest distance between PA 1721/23 and the N2K site shaded in green. Source: PA MapServer

The area close to the scheme is also designated as an Area of Ecological Importance *Irdumijiet Ta' Madwar il-Kosta miç-Ċirkewwa sa Bengħisa*.

The project envisages an upgrade of an existing drag strip including demolition and construction works, and extension of the race track. The works themselves are expected to have a significant environmental impact in terms of dust emissions, light, noise and vibrations, not to mention impact on traffic due to involvement of heavy

machinery on site. **We call on ERA to establish limits for noise level throughout the construction works and to monitor such works in order to limit the impact on the surrounding areas of ecological value.**

At the same time, during the operation of the facility (which is meant to host international events), the impacts, such as light and noise pollution, are of especially concerning nature, particularly because of expected harmful effects for seabirds colonising the protected cliffs close to Hal Far. Scopoli's shearwaters and Yelkouan shearwaters are both Annex 1 species under the Birds Directive, and are nocturnal birds active in colonies at night and are therefore sensitive to increased light pollution. The area of Hal Far industrial estate is heavily polluted by light as demonstrated by Figure 2. Therefore, it is important to promote sustainable light solutions for both newly proposed projects and for existing lighting schemes in the area.

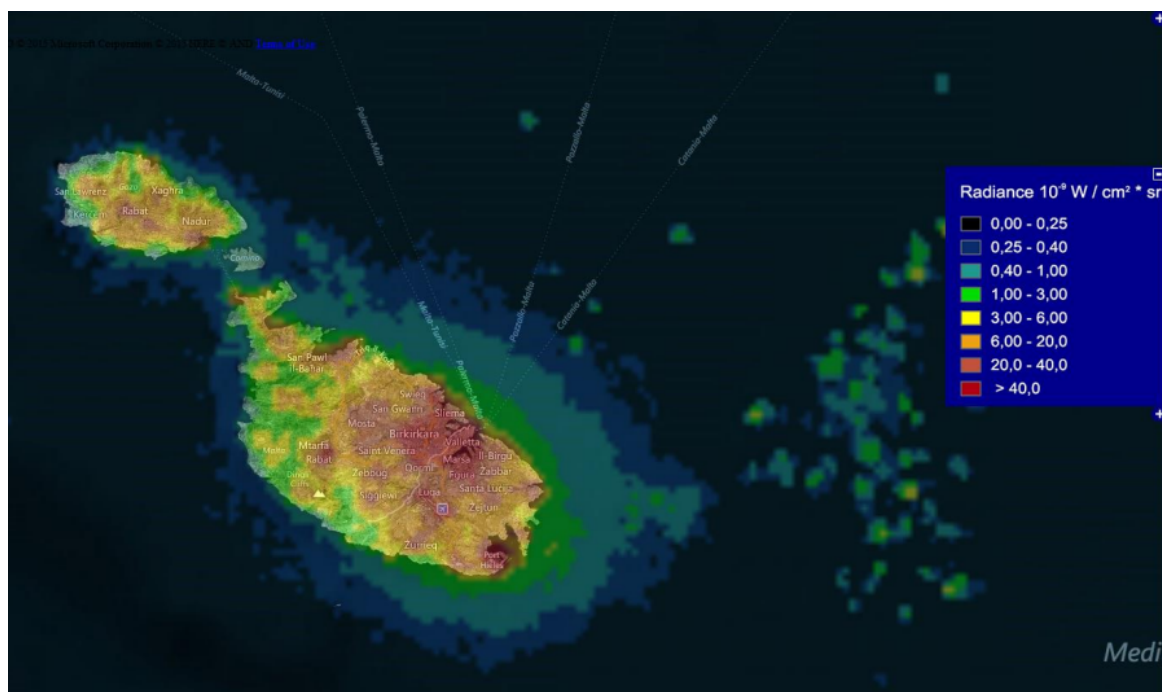


Figure 2. light pollution map created from VIIRS DNB Cloud Free Composites data of 20156 . Dark blue are areas with low luminous intensity, red are bright areas with high luminous intensity. Source: ERA's Guidelines for the reduction of light pollution in the Maltese Islands¹

Depending on the duration of the construction period the works can affect shearwaters during the most sensitive period when they breed. It is highly advised to arrange the timing in a way for the demolition/construction works to happen outside night hours. During operation, we also strongly recommend avoiding night events during the most sensitive fledgling period for Yelkouan Shearwaters during June to July and Scopoli's

¹ [Guidelines\(era.org.mt\)](http://Guidelines(era.org.mt))

Shearwaters during September to October due to attraction risk of fledglings to light and to take all necessary measures to avoid disturbance of seabirds. At the moment the existing drag strip is equipped with bright luminaries facing seawards (refer to Figure 3) which may contribute to an increased glare and light spill in the area, therefore we suggest that the proposed upgrade can be used as an opportunity to design an ecologically responsible lighting, including the use of full cut-off luminaries, adjusting the correlated colour temperature to ERA's recommendations¹ as much as possible, and switch off the lights when not needed. Importantly, such measures will also help to save costs and energy.



Figure 3. Existing lighting installed along the drag strip. BirdLife Malta

ERA's reply (doc 42a on Eapps) states there are no environmental concerns associated with such development. However, according to Environmental Impact Assessment Regulations, the scheme should go through mandatory screening process under:

- 1.0.2.1 Category II Development with a site area of 2ha or more;
- 7.2.2.2 Category II Permanent racing and test tracks for motorised vehicles;
- 7.1.2.1 Category II Projects which have a site area of 3ha and more.

Given the nature of the development, as well as the increase in scale of the facility to be upgraded, the screening under the Flora, Fauna and Natural Habitats Protection

Regulations should also take place, giving special attention to cumulative effect of developments nearby.

Separately but consequently, we would like to raise concern in relation to a development which currently is at the stage of pre-submission and is featuring a Motor racing track including a national multi-purpose motorsports hub. Together, these 2 developments are to form one large motor-racing facility as can be seen on Figure 4 below. The area of a newly proposed racing facility is stated to be at least 82,900 m². Together with an area occupied by the drag strip proposed for upgrade the project will have a massive footprint of more than 182, 000 m². Total mass and cumulative impact of these 2 proposals are of great concern in terms of consequences for human receptors in the vicinity and impacts on the environment. Such combined development should be studied altogether to define the environmental impacts and work out a set of feasible mitigation measures which would take into account cumulative pressures.

We invite ERA to also look at this development cumulatively and ascertain that any impacts from the whole complex are adequately studied, with necessary mitigation measures placed at concept stage rather than later, such that the development may have the least possible impact on both human and natural environments in the surrounding areas.

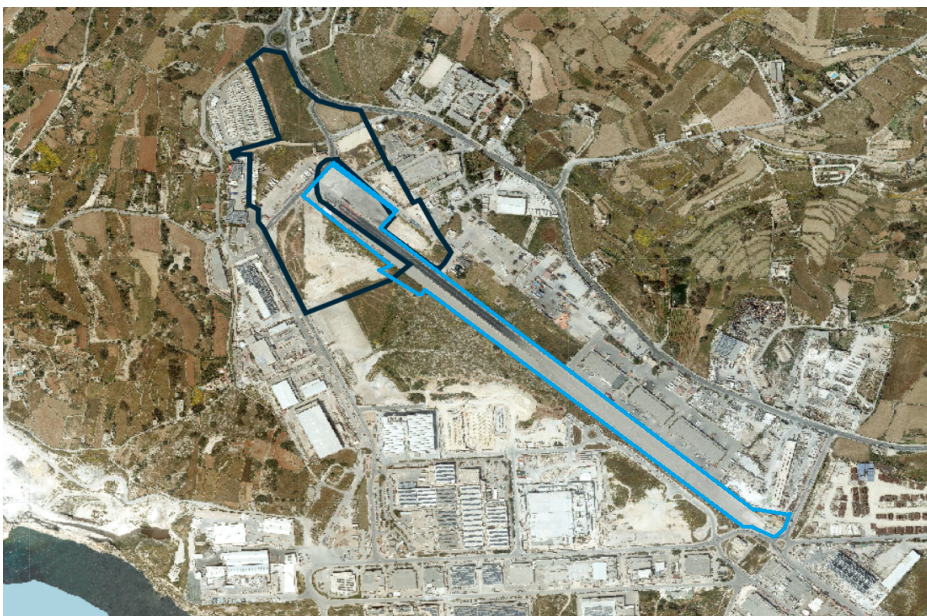


Figure 4. The boundaries of the PA 1721/23 in blue and the scheme of a pre-submitted application for a new multi-purpose motorsports hub in black. Source: PA MapServer and ERA's Geportal