

BirdLife Malta's feedback on PA 4688/23

Extension and alterations to existing factory consisting of the removal of waste storage area, changes to landscaping, and the construction of a technical area and generator room
18th September 2023

BirdLife Malta has analysed the documents uploaded onto the EApps with regards to the development in question and we would like to submit our feedback below.

This planning application is featuring an extension to an existing Sterling Chemicals building located in a highly sensitive area on the very edge of a protected valley, an SPA **Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Benghisa** and an SCI **Rdumijiet ta' Malta: Ir-Ramla taç- Ćirkewwa sal-Ponta ta' Benghisa** (please refer to Figure 1).

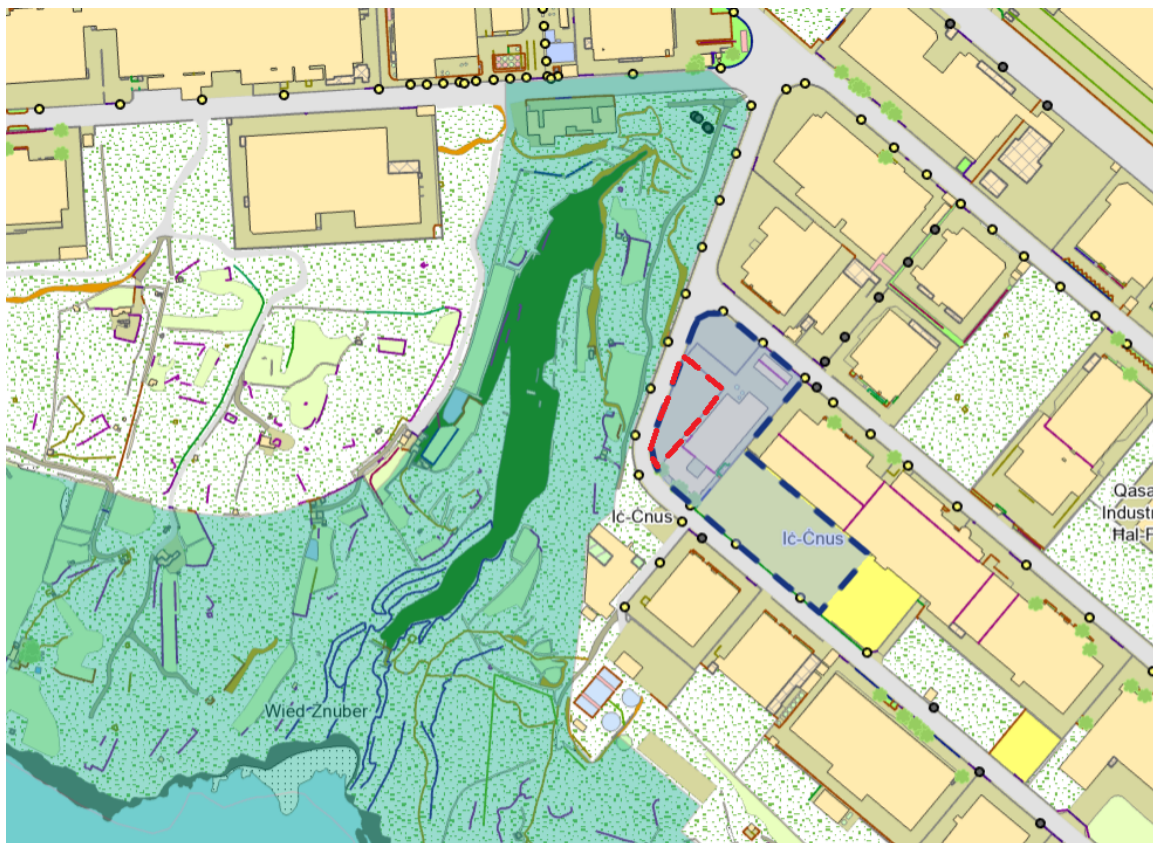


Figure 1. PA 4688/23 is in red dotted line, approved PA 8089/19 is in blue dotted line. Natura 200 site shaded in green. Source: PA Mapserver

The cliffs of Hal Far are widely colonised by Yelkouan shearwaters (*Puffinus yelkouan*) and Scopoli's shearwaters (*Calonectris diomedea*), which both are Annex I species protected under the Birds Directive. These shearwaters are active nocturnally at the



colonies, they carefully choose their breeding site with darkness being one of the most important conditions. Negative effects of light pollution for shearwaters can range from various sub-lethal effects, such as changes in biochemistry and behaviour including reduced nest attendance¹, to the direct causes of mortality by attraction of young birds by light on their first flight.

Importantly, the area in question, specifically Wied Żnuber, is suffering drastically from light pollution originating from the Hal Far industrial estate. Hal Far area has been identified as a light-induced seabird grounding hot-spot². The site is particularly important in terms of mitigating negative impacts arising from light pollution, because the given scheme is situated in a direct line of sight from Wied Żnuber seabird colony and any light pollution affects nest sites directly as demonstrated by Figure 3. Therefore, it is crucially important to promote the installation of a non-polluting lighting scheme in line with ERA's Guidelines for the Reduction of Light Pollution on the Maltese Islands³. In fact, ERA has already communicated its conditions (doc 47b) which would apply in case the planning application is approved, including:

- i. lighting shall be strictly limited to within the developed part of the site, and its height and orientation shall be designed in a manner that does not cause illumination beyond the developed site;*
- ii. lighting fittings and their supports shall be installed on the inner side of any peripheral landscaping, so as to be screened from the surrounding environment by means of the landscaping itself;*
- iii. all exterior lighting installed on site shall be horizontally aligned, downward-pointing, fully shielded and full cut-off. No luminaire globes, uplighters and/or high-level floodlighting are allowed; and*
- iv. lighting shall be of low-intensity "warm light" colour with a temperature not exceeding 3000K.*

These are the same conditions imposed by ERA in relation to previously approved PA 8089/19 which featured sanctioning of changes, alterations and increase in height of the Sterling chemicals building (later proposed for extension in a given PA 4688/23 as seen on Figure 1). At the same time, during a field visit to the colonies in August 2023 our team witnessed that ERA's conditions mentioned above with regards to PA 8089/19 are not fully met, particularly the building is evidently fitted with uplighters as seen on Figure 2. Hence, we would like to emphasise the importance of adherence to such conditions not to compromise the protected status of an adjacent Natura 2000 site and

¹ <https://link.springer.com/article/10.1007/s10336-023-02045-z>

² James Crymble et al. Identifying light-induced grounding hotspots for Maltese seabirds, *Il-Merill*, No 34, 2020

³ [Guidelines \(era.org.mt\)](https://era.org.mt/Guidelines)

the conservation status of Annex 1 species. Any obtrusive light affecting Natura 2000 site is unacceptable.

We also noticed that ERA's current conditions do not cover noise, vibrations and light pollution during the construction phase. We suggest that the illumination levels on site should be controlled by ERA throughout the construction phase. Night time construction works should be avoided and illumination of a construction site should be kept to a safe minimum and switched off when not required. Due to the high sensitivity of an area, we suggest that during the construction phase ERA should monitor vibrations and noise levels and potentially set limits for those. Impacts from noise during the operational phase should also be adequately mitigated.



Figure 2. Sterling Chemicals building fitted with uplighters. BirdLife Malta. August 2023.



Figure 3. View from Wied Żnuber seabird colony up to Sterling Chemicals site. BirdLife Malta. August 2023.

ENDS.