



**BirdLife Malta's comments in relation to the screening exercise for PA 4962/22 –  
To demolish existing buildings and car park; excavation and construction of a Regional Health  
Centre including public parking and public open space**

21 December 2023

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BirdLife Malta would like to file officially our comments and concerns as part of the screening exercise in relation to the proposed development featured in PA 4962/22. The proposed project includes the development of a Regional Health Centre and an underlying 4-level carpark including extensive demolition and excavation works. We realise that such a development is currently at a screening stage, which makes the time perfect to address any red-flags at an early stage of planning. We have reviewed the Project Description Statement available online, and all relevant documentation to the planning application, including ERA's responses to the Planning Authority.

Having said that, we are deeply concerned that the proposed development lies in the location of a number of mature *Ficus macrocarpa* trees which protected status seems to have been completely ignored in the commissioned PDS and even ERA's communications (doc 40a on E-Apps) – with the latter failing to even acknowledge their existence. The only two protected trees which are covered by the above-mentioned ERA's reply are Aleppo pine and Cypress for which uprooting requires an Environmental permit by ERA. However, according to The Trees and Woodlands Protection Regulations (First Schedule, Part B), *Ficus macrocarpa* is protected in urban public open spaces. Therefore, such trees are to be considered as protected under the law and such a protection status needs to be revised and acknowledged in the PDS.

According to the proposed plans, the site where these trees are located shall be excavated to create a multi-storey car park, and it is logical to assume that the development shall cause the complete destruction/uprooting of these trees, if it is approved as proposed.

From a preliminary survey conducted by BirdLife Malta, at least two of these mature *Ficus macrocarpa* trees, present within the scheme, provide a significant roost for White Wagtails (*Motacilla alba*) which is a species protected under the Conservation of Wild Birds Regulations and the Birds Directive. A preliminary count conducted recently (14.12.2023) estimates close to 800 White Wagtails using these trees every night as a roost. These trees are marked on the map below (Figure 1), and are also illustrated in Figures 2 and 3. A number of other *Ficus* trees bordering the parking area, also host various numbers of Spanish Sparrows which have not been yet quantified at the time of writing of this document.

The White Wagtail is a common wintering bird in Malta, using urban as well as rural green areas for foraging and preferring roosting in large numbers within sheltered tree areas. There are not many confirmed urban roosts of this species around the Maltese Islands, however it is a fact that large *Ficus macrocarpa* trees within urban areas are the preferred roosting site of these birds which congregate there communally to rest and spend the night. Some of largest roosting sites for the species include Valletta's *Ficus macrocarpa* trees at the Great Siege Square and near St John's Co-cathedral which congregate over 10,000 birds every night, earning the designation of the site as a national Important Bird Area. Other sites included Mosta square which has recently been butchered, destroying a roosting site which at its prime counted around 1,000 White Wagtails.

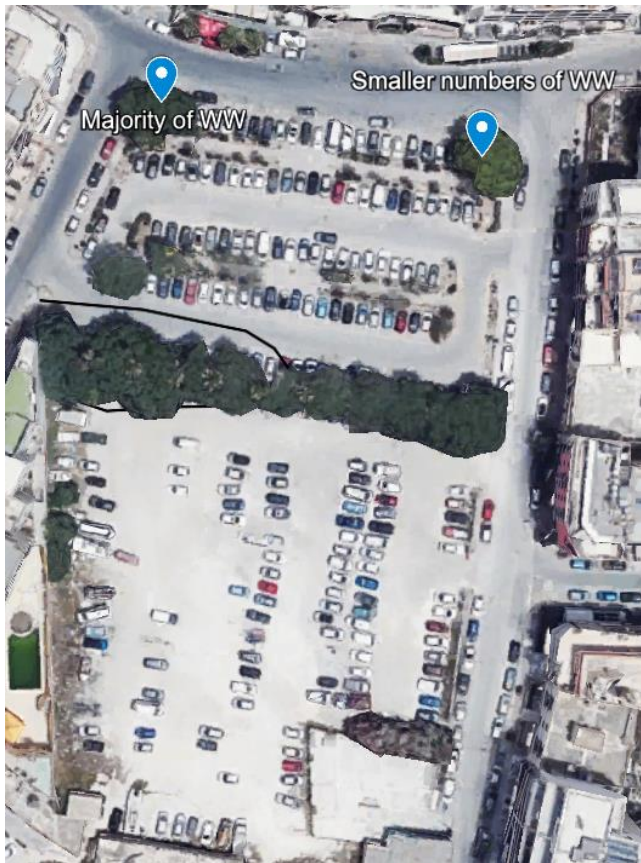


Figure 1. White wagtail roosts marked with blue pins and Spanish sparrow roost marked with black line as observed on the 14th December 2023. Image source: Google Earth

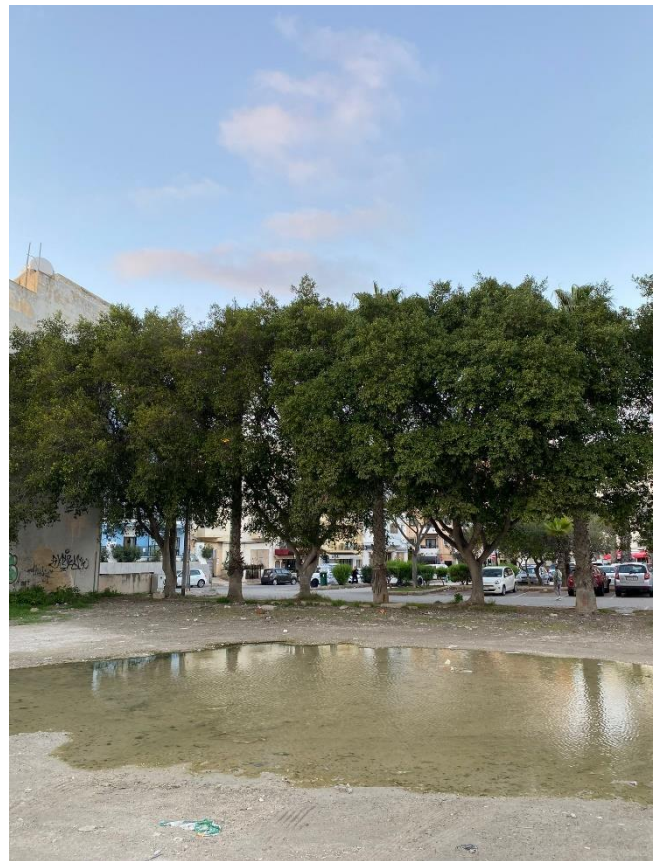


Figure 2: Mature *Ficus microcarpa* trees on the border of the existing car park



Figure 3: White Wagtails congregating to roost in one of the *Ficus* trees located within the proposed development scheme

The Spanish Sparrow, on the other hand, is a local breeding and resident bird, which frequents both rural and urban areas throughout the islands, also nesting in such localities. Similar to White Wagtails, Spanish Sparrows also show a tendency to roost in dense canopy trees like mature *Ficus macrocarpa*, in which such birds congregate for the night throughout the year in varying numbers. Such trees offer shelter and protection and can be crucial in extreme weather events in protecting avifauna from exposure to the elements.

According to Regulation 20 of the Trees and Woodlands Protection Regulations (S.L. 549.123), ERA is mandated to consider the 'species, habitats, ecosystems associated with trees', and therefore there is a legal obligation to consider such trees' functionalities as a roosting site for these protected species.

In view of the above and submitted information, BirdLife Malta brings to the attention of ERA, that in relation to the proposed development:

- The Project Description Statement is revised to acknowledge and consider the protected status of the *Ficus macrocarpa* trees within the scheme;
- ERA's responses to the Planning Application process take due consideration of such Ficus trees status as mandated by the Trees and Woodland Protection Regulations vis a vis their protected status, and their ecological function as a roosting site for avifauna;
- That such is also considered in the screening exercise such that any environmental assessment takes into account the ecological impacts of such a development as proposed, such that the impacts of the proposed development are fully looked into and avoided appropriately. An ecological survey should feature as part of the EIA in order to quantify and assess the development's impact on these trees and their function as a roosting site for White Wagtails and other avifauna.

Furthermore, BirdLife Malta appeals to the Foundation for Medical Services within the Ministry for Health to seriously and duly consider a revision of the proposed plans, to incorporate, rather than obliterate such trees within their scheme, acknowledging their importance for not just avifauna, but human health. The current situation with trees being massacred, translocated or obliterated from urban areas is unforgivable in such times when the country keeps seeing development at the expense of our well-being and that of our environment.

BirdLife Malta shall follow this case and will reserve its right to make further comments and assessments in due course.

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