



## BirdLife Malta's comments on the Partial Local Plan Review of the SMLP for Hal Far (Phase 1) 21st December 2023

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In response to a public consultation call launched by the Planning Authority with regards to the Partial review of the South Malta Local Plan, BirdLife Malta would like to submit the following feedback.

The map shared with the public demonstrates the area proposed as a buffer zone to the SAC while simultaneously removing it from within the Industrial Estate boundaries. At the same time, the Authority is proposing to allocate “a small portion” of the site for low-impact sports, however neither such portion is indicated on the map, nor is the exact size of it specified. It is clear that under the “low-impact sports”, the Authority means the development of an airstrip for model aircrafts for which the agreement exists between the government and the Hal Far Model Flying Association signed in 2022. Therefore, the current SMLP review process is meant to serve the interests of few and cannot be justified.

The area is bordering the Natura 2000 sites:

- an SPA ***Rdumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Bengħisa;***
- an SCI ***Rdumijiet ta' Malta: Ir-Ramla ta' Ċirkewwa sal-Ponta ta' Bengħisa.***

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 sites 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 attendance, to the direct causes of mortality by attraction of young birds by light on their first flight. Seabirds are also sensitive to extensive noise, presence of which can prevent them from returning to the colonies.

The area proposed for low-impact sports serves as an important buffer zone for the protected fauna and flora of an increasingly endangered habitat – garigue and rock habitats where rainwater ponds form. Wied Żnuber itself is one of the few remaining natural sites in Birżebbuġa and its surroundings. Importantly, the area in question, specifically Wied Żnuber, is suffering drastically from light pollution originating from the Hal Far industrial estate. The Hal Far area has been identified as one of the light-induced seabird groundings hot-spots (refer to Figure 1). There is no excuse for favouring projects which would add to the existing levels of light pollution in this coastal area.

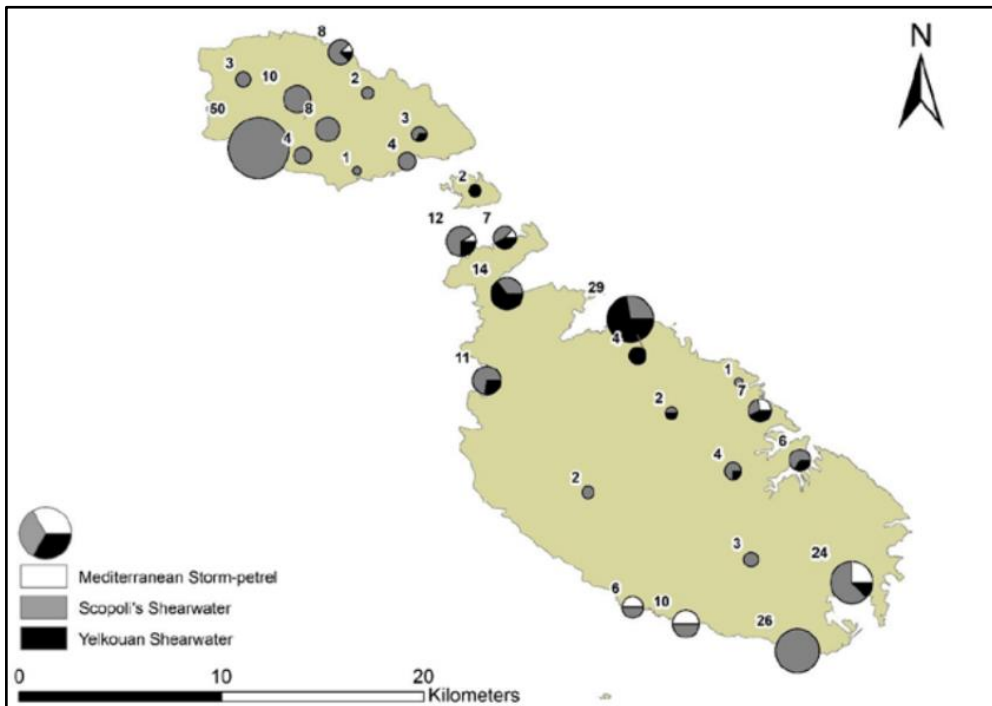


Figure 1. Locations of recorded light-induced grounding cases per species

Regardless of the size of the land taken by the airstrip, the increased noise levels of the operating facility are going to have an adverse impact on all of the valley system, the cliffs with nesting shearwaters, and the surrounding sea (irrespective of the airstrip's operation during night or day). While the construction of an airstrip will create a great amount of noise, vibrations and dust itself, at the same time destroying the protected garrigue and disturbing the valley ecosystem, the operation of the facility is expected to have a range of permanent negative impacts including noise and light pollution in the sensitive area, increased traffic and trampling due to increased number of users. Clearly, the airstrip will not be constructed without a parking site, access ways and other ancillary facilities such as administrative buildings. The footprint, scale and nature of such development is absolutely incompatible with the area's natural character and will compromise the status of a Natura 2000 site.

The development of the Hal Far Industrial Estate has caused already an irrevocable impact with immense anthropogenic pressure on the coastal cliffs and the Natura 2000 sites in vicinity, while the area in question being undeveloped is an essential shield for the vulnerable ecosystems that sustain the cliffs' designation as a Natura 2000 site. Hence, BirdLife Malta is absolutely against the proposed designation of any portion of the given area for "low-impact sports". We would rather support the initiative to create an official buffer zone to ensure the protected status of a Natura 2000 site and call for securing the buffer zone as an area where no intrusive activities, such as model aircraft flying, are allowed. We also advocate for the site in question to not only not be considered for any type of development, but to be reprinted in order to ensure the Natura 2000, its habitats, flora and fauna, reach a Favourable Conservation Status, as is mandated by Malta to honour its Nature Directives obligations.