



BirdLife Malta's feedback on the Case Officer Report regarding the
PA 1721/23 Upgrading of existing drag strip for international events
Hal Far, Birzebbuga
09 February 2024

BirdLife Malta has analysed the information presented in the Case Officer Report (COR) regarding the PA 1721/23 featuring the proposal on upgrading of existing drag strip for international events to achieve international safety standards including the following: demolition and reconstruction of spectator stands with underlying ancillary facilities including changing rooms, stores, sanitary facilities and Class 4B shop, demolition and relocation/reconstruction of existing control tower/ancillary facilities on four levels which include stores, administration offices (Class 4A), Class 4C shop, Class 4D shop, club rooms/multipurpose hall, VIP hospitality and control/commentary box, maintenance and extension of existing safety barriers, maintenance and extension of existing racing track, the construction of four garages and store. Our feedback is as follows.

According to the COR, the case officer has recommended the planning application for approval despite some obvious environmental concerns which have not been even devoted attention. ERA's current position regarding the estimation of the potential impacts is unacceptable. Namely, the communication from ERA constitutes just a short message informing the applicant "there are no environmental concerns" in relation to this development without even delving into the details, nor providing any appropriate estimation of potential impacts (document 42a on EApps).

We would like to stress once again that the drag strip is located within a short distance from a highly sensitive area where seabirds protected under national and EU legislation breed (Yelkouan and Scopoli's shearwaters); which area is also designated as a **Special Protection Area** Rđumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Bengħisa (MT0000033). Apart from that, the area is protected as a **Site of Community Importance** Rđumijiet ta' Malta: Ir-Ramla taċ- Ċirkewwa sal-Ponta ta' Bengħisa (MT0000024) for valuable and diverse habitats it supports. The area close to the scheme is also designated as an **Area of Ecological Importance** Rđumijiet Ta' Madwar il-Kosta miċ-Ċirkewwa sa Bengħisa. The protection of such important natural features is crucial and is an obligation of the government.

The nature of the project is such that the associated environmental impacts are expected to be high, especially due to the increased noise, light and dust (PM) pollution during the construction and the operational phase. These impacts cannot be ignored,



particularly because the area of Hal Far industrial estate already is a subject of intense development, and is heavily polluted by light and noise. As mentioned in our previous submission in relation to this development proposal, the existing drag strip is equipped with bright luminaries facing seawards, contributing to light pollution and affecting the SPA. BirdLife Malta has repeatedly collected stranded shearwaters from this area during their fledgling period, as a result of existing light pollution.

We urge the Planning Authority to not approve such a massive development without properly assessing the environmental impacts. We also call onto the PA to take a decision based on the results of the assessment of the cumulative impacts, taking into account the existing developments close to the site, as well as the proposed multi-purpose motorsports hub which is planned in the site bordering the scheme in question with a clear intention to create one large motorsports complex including the drag strip proposed for upgrade.

Should the development be favoured after assessing the environmental impacts and working out a set of mitigation measures, the imposed conditions should include limits on the levels of noise; mandatory installations of noise attenuation during the construction and the operation of the facility; ecological lighting scheme to be in place. We call on ERA to pull up its sleeves on the matter and not shy away from declaring the need of thorough impact assessments as the law mandates. ERA should at the very minimum establish limits for noise levels throughout the construction works and to monitor such works in order to limit the impact on the surrounding areas of ecological value. The noise levels during the operational phase should be constantly measured to make sure the adverse influence on the sensitive receptors is avoided as much as possible.