



**BirdLife Malta's objection to the PA/01633/24  
Phase 2 following proposed demolition and excavation as per  
PA/04587/20. To construct 46 residential units and a shop (Class 4B)  
with underlying garages and car spaces organized into 13 levels**

26<sup>th</sup> April 2024

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BirdLife Malta has analysed the documents present on the PA's online portal regarding the proposed development of 46 residential units organized into 13 levels in Xlendi, including an underground parking area. We hereby present our concerns and ultimately our objection to the development.

This application exemplifies a common but harmful practice: splitting a single development into multiple planning applications. The development in question was divided into two phases, the first phase of which consisted in demolition and excavation of the site (PA/04587/20). This was subsequently followed by the application of PA/5500/22 which proposed a Phase 2 of the development, with the construction of 51 residential units and 2 shops with underlying garages and car spaces organised into 13 levels. Although the latter application was withdrawn by the applicant, a new application for Phase 2, PA/01633/24, has now surfaced. Such a practice of splitting development into two phases, does not allow one to see the full picture and scale of the project, nor to assess the whole range of environmental impacts associated with such development.

The scheme shall encroach onto an important Natura 2000 site SAC *L-Inħawi tax-Xlendi u tal-Wied tal-Kantra*, Marine SPA *Żona fil-Baħar ta' madwar Għawdex MT0000112*, as well as an *Area of Ecological Importance* and a *Site of Scientific Importance Wied ix-Xlendi, Wied il-Lunzjata u l-inħawi tagħhom, fil-limiti ta' Kerċem, il-Munxar, Fontana u r-Rabat (Għawdex)*. Therefore, we can say with confidence that the construction of 13-storey residential units, also comprising of underground levels, is likely to have a massive impact on these important sites.

Particularly, we are concerned that the construction and operation phase of this proposed development will be a source of noise and light pollution. Such pollution will be a threat to the colony of protected Scopoli's shearwaters (listed as Annex 1 of the Birds Directive) which breeds in the cliffs opposite of the proposed development. This concern is heightened by the cumulative impacts of adjacent developments and ongoing tourism activities in the urban environment of Xlendi. Scopoli's shearwaters are nocturnally active seabirds and it is well established that such species are often grounded in areas polluted



by artificial light. It has even been reported that chick provisioning visits by Scopoli's shearwaters decreased during disturbing human activities<sup>1</sup>.

Especially alarming is the height of the proposed development which is 13 floors above street level. This goes against the Gozo and Comino Local Plan, wherein the building height within the area in question should not exceed 4 floors. The Local Plan clearly stipulates that "whilst it may be desirable to slightly intensify development, the impact should be contained so that the scenic qualities and the tourist experience of the area are not compromised"<sup>2</sup>. In view of this stipulation, we are concerned that this development heavily compromises the scenic qualities and the tourist experience of the area. In addition, the proposed development is not exemplary for Malta's ambition to integrate Integrated Coastal Zone Management (ICZM) in the development of coastal areas. The ICZM Protocol, which Malta acceded in 2019, provides a framework to stimulate a more concerted and integrated approach to sustainable coastal zone management, involving public and private stakeholders<sup>3</sup>.

Moreover, it is quite concerning that the development is proposing underlying car spaces and garages organized into 13 levels. Whilst it is well known that Xlendi suffers from a lack of parking spaces, encouraging more cars in the area would increase traffic, air and noise pollution. Xlendi's narrow streets and road infrastructure are not designed to accommodate a significant influx of cars. This also contradicts Thematic Objective 1 of the Strategic Plan for the Environment and Development (SPED) which includes the safeguarding of prime tourism sites and reducing development densities of urban settlements to manage the available potential space. The site is also identified as a 'Small Urban Settlement to accommodate development serving local needs'<sup>4</sup>. Clearly, the proposed development is not intended for serving local needs, but only for the benefit of a few individuals. Lastly, Coastal Objective 1 of the SPED states that in designing terrestrial urban coasts, compatible urban coastal uses which safeguard legitimate coastal uses and visual access from promenades, should be employed. The proposed 13-storey development shall go over and beyond the present surrounding building heights, jeopardizing the authentic character of Xlendi.

In conclusion, the development is massive and located very close to a Natura 2000 site which means it will impinge and impact the protected area. It will also become an

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<sup>1</sup> Syposz, M., Padget, O., Willis, J., Van Doren, B. M., Gillies, N., Fayet, A. L., ... & Guilford, T. (2021). Avoidance of different durations, colours and intensities of artificial light by adult seabirds. *Scientific Reports*, 11(1), 18941.

<sup>2</sup> Malta Environment and Planning Authority (2006). Gozo and Comino Local Plan. <https://www.pa.org.mt/file.aspx?f=8F0DB0BB569DF5B7A6C19C78570B4FE6B1F55AC49A65498A>.

<sup>3</sup> <https://www.gov.mt/en/Government/DOI/Press%20Releases/Pages/2019/April/11/pr190758.aspx>

<sup>4</sup> Strategic Plan for the Environment and Development (2015). <https://sustainabledevelopment.gov.mt/wp-content/uploads/2021/10/Strategic-Plan-for-the-Environment-and-Development-SPED.pdf>



additional source of light and noise pollution during both construction and operation phases which shall create another pressure for the protected Scopoli's shearwaters for which the coastal Natura 2000 site is designated. The height of the proposed development is absolutely unacceptable and contradicts the limitations and objectives set in the Local Plan and SPED. On basis of all the above-mentioned, BirdLife Malta objects to the PA/01633/24.