



**BirdLife Malta's Objection to Fort Chambray Phase 3 development comprising a Class 3B 5-star aparthotel with 64 ensuite rooms, 50 serviced apartments and ancillary amenities; 105 high quality Class 1 residential units with highly landscaped pedestrian environment and creation of a new public piazza (PA/03884/23)**

3 May 2024

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BirdLife Malta has analysed the documents present on the PA's online portal regarding the proposed Phase 3 development within Fort Chambray, a historical site dating back to the 18<sup>th</sup> Century. We hereby present our concerns and ultimately our objection to the development.

One of our major concerns is the scale of this development and the impact it shall have on the surrounding environment. This massive overdevelopment will comprise of an aparthotel featuring 219 accommodation units, two levels of underground parking with 319 garages, retail outlets, hotel restaurants, a clubhouse, hotel snack bar and outdoor catering areas. If this huge tourist complex development is completed, it shall stand at an elevated height of around 70m on top of Ras it-Tafal hill, unobstructed and overlooking Ix-Xatt l-Aħmar and Mġarr Harbour. More concerning is the 130-meter distance of this development to the Natura 2000 site, Żona fil-Baħar ta' madwar Għawdex (MT0000112). This means that any light and noise pollution emanating from the tourist complex is devoid of any obstructions and will directly spill over this protected area. This concern is heightened by the cumulative impacts of light and noise pollution emanating from the adjacent Mġarr Harbour and ship traffic within the Malta-Gozo channel.

MT0000112 is an important special protected area for two seabirds breeding in the Maltese islands, the Yelkouan shearwater, *Puffinus yelkouan*, and Scopoli's shearwater, *Calonectris diomedea*, both listed in Annex 1 of the EU Birds Directive. Developments with poorly designed lightning schemes and an overuse of bright-white LEDs have severe consequences for the natural environment, especially for breeding shearwaters<sup>1</sup>. The proposed development site lies less than 3Km away from around 95 breeding pairs of *P. yelkouan* in Kemmunett colony and around 75 breeding pairs of *C. diomedea* in Ras in-Newwiela colony, shown in Figure 1 and 2 respectively<sup>2</sup>. Seabird fledglings are attracted by artificial lights when they leave their nest at night, causing high mortality. Studies have shown that 50% of Scopoli's shearwater fledging groundings were located within a 3 km radius from the nest-site. Following such findings, it was suggested that an effort should be made to reduce light pollution to levels as low as possible in natural protected areas, but also in adjacent areas, i.e. within 3 km from colonies. This action could reduce the attraction of shearwaters to light by 50%. However, greater light pollution intensities have a larger attraction radius. Therefore, a

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<sup>1</sup> Crymble, J. (2020). Guidelines for Ecologically Responsible Lighting. <https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>.

<sup>2</sup> BirdLife Malta (2021). SEABIRD FIELDWORK REPORT 2021. <https://era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf>.

3 km buffer may not necessarily be enough to reduce attraction<sup>3</sup>. The Yelkouan shearwater is also a nocturnal species and it is known that brighter conditions significantly reduce colony attendance. Disruption of natural attendance patterns is likely to have short- and long-term effects on breeding success, physiological condition, and colony viability<sup>4</sup>.

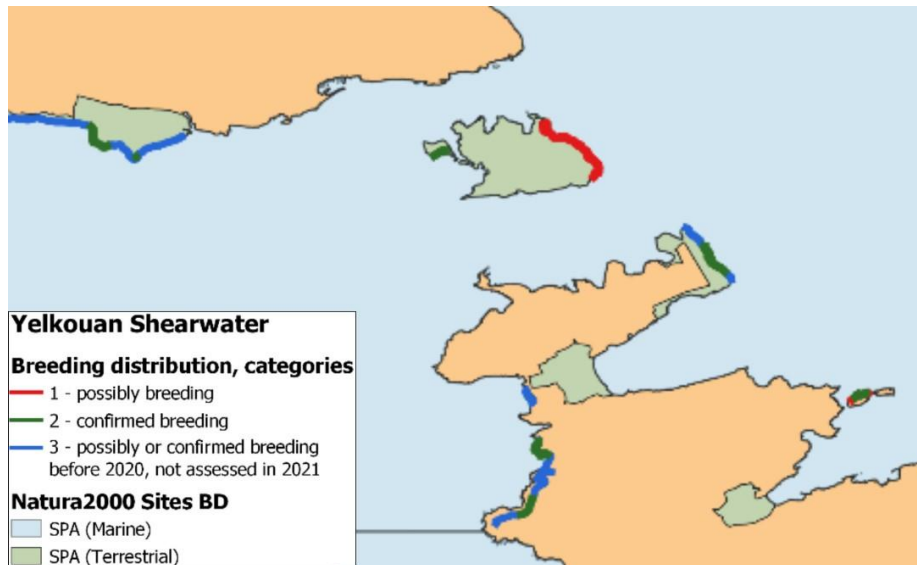


Figure 1: Mapped breeding distribution of *P. yelkouan* in the Maltese Islands (Source: BirdLife Malta, 2021)

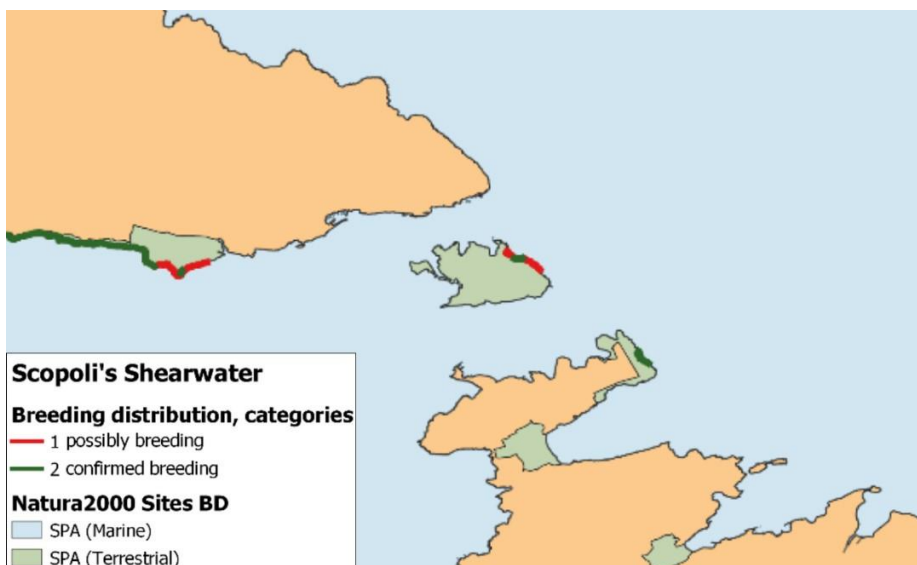


Figure 2: Mapped breeding distribution of *C. diomedea* in the Maltese Islands (Source: BirdLife Malta, 2021)

<sup>3</sup> Rodríguez, A., Rodríguez, B., & Negro, J. J. (2015). GPS tracking for mapping seabird mortality induced by light pollution. *Scientific reports*, 5(1), 10670.

<sup>4</sup> Austad, M., Oppel, S., Crymble, J., Greetham, H. R., Sahin, D., Lago, P., ... & Quillfeldt, P. (2023). The effects of temporally distinct light pollution from ships on nocturnal colony attendance in a threatened seabird. *Journal of Ornithology*, 164(3), 527-536.



Even though, according to the Gozo and Comino Local Plan, the site of Fort Chambray is destined for a tourist related project, we strongly believe that the massive scale of the proposed development is not sustainable for Għajnsielem. This development plan will permanently change the character of Għajnsielem, which is presently largely undeveloped and surrounded by agricultural land, which separates it from nearby settlements. The development will without doubt increase traffic congestion and thus reduce air quality in Għajnsielem, not to mention the increase in traffic noise. It shall increase other pressures in the area including a strain on the current sewer infrastructure, increasing the risk of overflow affecting and affecting water quality of nearby coastal areas. Furthermore, the excavation and demolishing works during the development's construction phase along with the massing and weight of the proposed buildings are of great concern in terms of geology, geomorphology and integrity of the historical site. The development contradicts Thematic Objective 8 of the Strategic Plan for the Environment and Development (2015), where it encourages "re-appraising the value of the character, amenity and distinctiveness of designated areas and sites for their built heritage value".

Although we recognize ERA's request for a Lighting Plan and a Geo-technical study, we have significant concerns that these plans and studies may not adequately consider environmental impacts. We fear that any requirements set forth may be disregarded during the operational phase, exacerbating environmental impacts. ERA's Lighting Plan Terms of Reference fail to account for impacts on avifauna and lack specific requirements for ecologically responsible lighting. ERA's 'Guidelines for Reduction of Light Pollution in the Maltese Islands' and BirdLife Malta's 'Guidelines for Ecologically Responsible Lighting' are not duly taken into consideration within the Lighting Plan<sup>5,6</sup>. Given these concerns, BirdLife Malta opposes the current proposed development and urges additional assessments of its environmental impacts.

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<sup>5</sup> <https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf>

<sup>6</sup> <https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>