



## **BirdLife Malta's comments on 'AMENDMENT FOR PUBLIC CONSULTATION TO CLARIFY INTERPRETATION OF BUILDING HEIGHT LIMITATIONS'**

17 June 2024

---

Local Plans approved between 1995 and 2006 included restrictions on building heights, expressed as the maximum number of floors allowed for each urban block. Under the new interpretations, it is anticipated that, as has already been occurring in recent years, buildings will have more floors than those specified in the Local Plans. Additional floors within a specified height imply:

- More residents will be living in urban blocks, increasing population densities;
- Increased traffic and vehicular noise pollution;
- Greater strain on electrical and sewage infrastructure; and
- Increased noise and light pollution emanating from the urban blocks.

It is important to consider that these impacts accumulate, leading to cumulative effects that are often overlooked in the approval of planning applications. This oversight can result in unforeseen circumstances that diminish the quality of life for residents, including increased traffic congestion, noise and air pollution, and sewage overflows. These impacts also have environmental implications when urban blocks are situated opposite of protected areas and Outside Development Zones, a case in point is Triq il-Pwales facing Simar, a Ramsar site, and a Special Area of Conservation within the EU Natura 2000 network. In recent years, Simar is being threatened by the construction of apartment blocks in Triq il-Pwales which are reaching up to seven floors, as opposed to the four floors specified in the North West Local Plan policy. This poses a significant threat to the nature reserve, an important wetland which serves as a sanctuary for both resident and migratory birds. Of particular concern are light and noise pollution spilling directly over the wetland, jeopardizing the ecosystem services provided by this protected site. Hence, in the development of this new policy, for regions situated within the buffer zone of protected areas and Outer Development Zones, we stress the importance of not exceeding the number of floor plans stipulated in the Local Plans.

We believe that overall, changing the interpretations largely contradicts Malta's Strategic Objective 2 of Malta's Sustainable Development Strategy for 2050, on the preservation of sustainable urban development. Through this objective, "appropriate spatial planning policies and developing standards for smart and sustainable urban design and planning" is envisaged. Changing the interpretation of building height limitations, combined with the current urban infrastructure situation, does not align with appropriate spatial planning policies. Instead, we advocate for stringent plans for sustainable development and a greater effort to eliminate any impacts on protected sites resulting from urban developments.