



BirdLife Malta's comments on the Partial Local Plan Review of the SMLP for Ħal Far (Phase 2)

25 July 2024

In response to the public consultation call launched by the Planning Authority with regards to Phase 2 of the Partial review of the South Malta Local Plan, BirdLife Malta would like to submit the following feedback.

While we welcome Objective 1 of the review, which involves removing an area in Ħal Far from industrial development plans as specified in the South Malta Local Plan, we strongly oppose Objectives 2 and 4. These objectives reveal that the true aim of the policy review is to facilitate the development of an aero modelling facility. This stems from a secret agreement made in February 2022 between three government agencies and the Ħal Far Model Flying Association. The review of policy SMHF04 explicitly states: "For the purpose of this policy, Low Impact Sports may include an aero modelling facility." This directly contradicts the public consultation statement, which claims that "the primary purpose behind this policy review is to keep harmful industrial development as distant as possible from the area of high environmental value." This claim is misinformed and misleading, as the impact of model airplanes flying over a large area will inevitably affect other receptor areas outside the designated low-impact sports site, particularly the two bordering Natura 2000 sites:

- SPA Rđumijiet ta' Malta: Wied Moqbol sal-Ponta ta' Bengħisa; and
- SCI Rđumijiet ta' Malta: Ir-Ramla taċ- Ċirkewwa sal-Ponta ta' Bengħisa.

The cliffs of Ħal Far are colonised by Yelkouan shearwaters (*Puffinus yelkouan*) and Scopoli's shearwaters (*Calonectris diomedea*), which both are Annex I species protected under the Birds Directive. The most recent publication reports around 90-100 breeding pairs of *P. yelkouan* and around 80-160 breeding pairs of *C. diomedea* present in Ħal Far¹.

The area in question, specifically Wied Żnuber, is suffering drastically from light pollution originating from the Ħal Far industrial estate. Data on grounding cases of seabirds in the Maltese islands identifies Ħal Far area as one of the light-induced seabird groundings hot-spots, as shown in Figure 1 below. The further development of Ħal Far, including an aero modelling facility or any other 'low impact sports', will inevitably add on to the present light pollution problem in the area. Developments with poorly designed lightning schemes and an overuse of bright-white LEDs have severe consequences for the natural environment, especially for breeding shearwaters. Seabird fledglings are attracted by artificial lights when they leave their nest at night, causing high mortality². Moreover, adult shearwaters tend to reduce colony attendance when the cliff face is illuminated, a predatory avoidance strategy. In a study conducted locally, it has been reported that brighter conditions significantly reduced colony attendance by Yelkouan shearwaters. Disruption of natural attendance patterns is likely to have short- and long-term effects on breeding success, physiological

¹ Metzger, B. & Austad, M. (2021) SEABIRD FIELDWORK REPORT 2021. https://era.org.mt/wp-content/uploads/2022/07/GF-Admin-48-2020_Fieldwork_Report_final.pdf

² Rodríguez, A., Rodríguez, B., & Negro, J. J. (2015). GPS tracking for mapping seabird mortality induced by light pollution. *Scientific reports*, 5(1), 10670.

condition, and colony viability³. Ultimately, any light pollution at the site is likely to directly light up the colony site at Wied Żnuber.

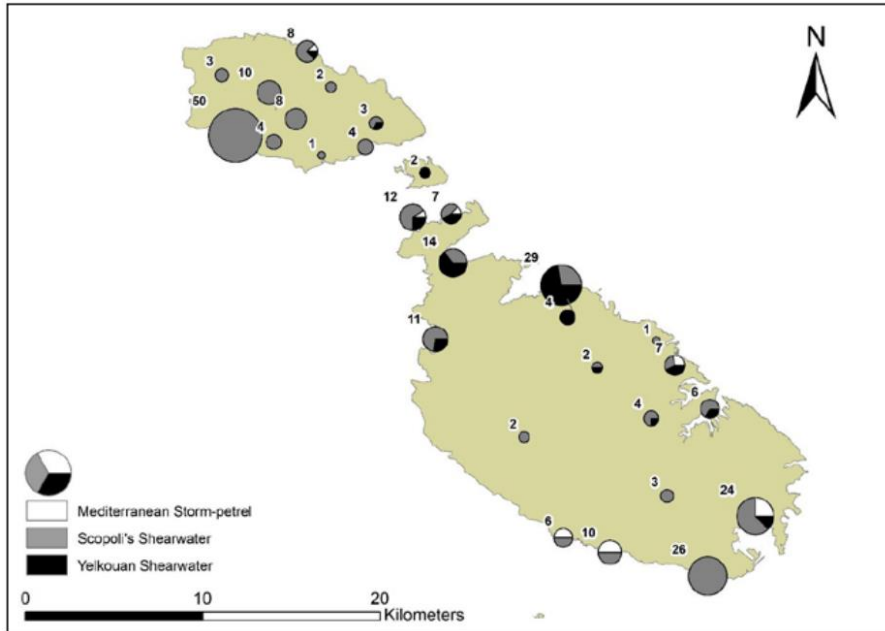


Figure 1: Locations of recorded light-induced grounding cases per species⁴

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). It has even been reported that chick provisioning visits by Scopoli's shearwaters decreased during noise-inducing human activities, indicating that sound disturbances can have a negative effect on parental care in *C. diomedea*⁵.

The conversion of this undeveloped area for 'low impact sports' use shall further increase encroachment towards the cliffs, increase traffic in the area and intensified trampling due to a higher number of users. The airstrip will also be built with a club house, parking site, access ways and possibly other ancillary facilities like administrative buildings. The footprint, scale and nature of such development is incompatible with the area's natural character and will compromise Malta's obligation of protecting Natura 2000 sites from threats of degradation and destructive developments, as required by the Birds and Habitats Directives.

In light of the above concerns and projected impacts, BirdLife Malta strongly objects the proposed Objectives 2 and 4 of the review. We demand that ALL of the area indicated in Figure 1 of the public consultation draft of the 'Partial Local Plan Review of the South Malta Local Plan 2006, as amended in 2017 for Hal Far', is safeguarded from ANY form of development. All of the areas in question should be designated as 'Area to be Conserved and Restored' as proposed by the new policy SMHF 05.

³ 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.

⁴ Crymble, J., Mula-Laguna, J., Austad, M., Borg, J. J., Sultana, J., Barbara, N., ... & Metzger, B. (2020). Identifying light-induced grounding hotspots for Maltese seabirds.

⁵ Cianchetti-Benedetti, M., Becciu, P., Massa, B. & Dell'Omo, G. Conflicts between touristic recreational activities and breeding shearwaters: short-term effect of artificial light and sound on chick weight. *Eur. J. Wildl. Res.* 64, 19 (2018).