

BirdLife Malta's objection to proposed change in plot parcelling and alignment at Tal-Wej, Naxxar (PC/00011/24)

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BirdLife Malta objects to PC/00011/24, a proposed development which encroaches on a recently designated Natura 2000 site, L-inħawi tal-Wej (MT0000036). The application is seeking for a change in the plot alignment which is intended for residential use, thus allowing urban sprawl on an Outside Development Zone and a Natura 2000 site.

The site owes such conservation status due to the temporary freshwater rock pools present on site which are locally rare and host extremely rare and often endemic or sub-endemic biota and generally dominated by microcrustaceans, filamentous algae and aquatic macrophytes¹. Consequently, due to the rarity of the habitat type and the residing rare aquatic community, the site is of great ecological significance for conservation in a local context.

Species which are found in the area include the Tadpole Shrimp (*Triops cancriformis*), the Painted Frog (*Discoglossus pictus pictus*) and the Pelago-Maltese endemic Maltese Waterwort (*Elatine gussonei*). The latter is also listed as an Annex II species within the Habitats Directive and listed in the Red Data Book for the Maltese Islands and in the IUCN Red List of Threatened species. The proposed site also lies within a few metres of a habitat characterised by the rare West Mediterranean clifftop phrygas (*Astragalo-Plantaginetum subulatae*)². In addition, the site provides a good feeding ground for breeding birds present in the area, including Zitting Cisticola, Sardinian Warbler and the Blue Rock Thrush.

Given its designation as a Natura 2000 site under the Habitats Directive, the area should be given priority for its maintenance or restoration and should be protected from threats of degradation or destruction. Moreover, in accordance with the Habitats Directive, "an appropriate assessment must be made of any plan...likely to have a significant effect on the conservation objectives of a site which has been designated"³.

The 'L-inħawi tal-Wej' site also enjoys other national protective measures including as an Area of Ecological Importance (AEI), Site of Scientific Importance (SSI) (ecology) and Class A Area of Archaeological Importance, as per G.N. 791 of 2011. The site is also protected as a Special Area of Conservation of National Importance, as per G.N. 683 of 2018, due to the presence of various important natural habitat types and species².

In light of the above, BirdLife Malta strongly objects to PC/00011/24. The site should receive the highest level of protection, and any development proposals encroaching upon it must be dismissed. Significant habitat areas in Naxxar and Mosta have already been lost to past poor planning decisions. Consequently, every remaining untouched portion of this site is crucial and must be preserved, such that the integrity of this Natura 2000 site is safeguarded. In addition, approving such developments would contradict Malta's commitment to conserving and protecting L-inħawi tal-Wej.

¹ Lanfranco, S. (2004, May). Temporary freshwater rockpools in the Maltese Islands (Central Mediterranean): formation, ecological processes and implications for management and conservation. In LIFE conference on Mediterranean Temporary Ponds. Roquebrune-sur-Argens, France

² ERA (2020). MT0000036 - L-Inħawi tal-Wej, Mosta/Naxxar: Designation Report. https://era.org.mt/wp-content/uploads/2020/11/Tal-Wej-Designation-Report_ERA.pdf.

³ European Council. (1992). Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Official Journal L 206, 22/07/1992 P. 0007 - 0050.