



**Objection to PA/05846/24: Excavate and construct 21 garages in total at lower basement, upper basement and ground floor level and 18 apartments in total at first, second, third, fourth, fifth and receded floor levels**

4<sup>th</sup> October 2024

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BirdLife Malta opposes the proposed development at Triq il-Hagra l-Wieqfa, Xemxija, located within a bird sanctuary, Il-Madwar tas-Simar, in Ramla tal-Pwales, San Pawl il-Baħar and within the buffer zone of the Natura 2000 site, Is-Simar (MT0000006).

Is-Simar contains rare coastal lagoons and temporary ponds, surrounded by garrigue and farmland. This area is one of the few remaining wetlands in the Maltese Islands and is highly protected under the Birds and Habitats Directive. It provides critical feeding and resting grounds for various migratory bird species, some of which are vulnerable in Europe. Additionally, Is-Simar is the only location in Malta where species such as the Little Bittern, Common Coot, and Little Grebe breed or have bred. The reserve is also a key stopover for large flocks of herons and other migratory birds.

The buffer zone around Is-Simar is already heavily developed, with many buildings exceeding the height restrictions set by the North West Local Plan (NWLP). This has led to increased noise and air pollution during construction, along with cumulative urbanization impacts, including light pollution. Poor lighting schemes, in particular, have worsened across the Maltese Islands, leading to serious ecological consequences and disturbing the natural behaviour of nocturnal wildlife. The current application proposes a building with five floors and receded floor levels, exceeding the NWLP's height limit, which allows for only four floors on this site. If approved, this development would breach the NWLP, further contributing to the area's light pollution and threatening the integrity of Is-Simar. As a Natura 2000 site, Is-Simar's buffer zone should be prioritized for conservation and protected from degradation or destruction.

The proposed additional floors, amounting to 18 new residential apartments, will lead to increased traffic in Xemxija, an area already known for its seasonal traffic congestion. More residential development would worsen the situation, leading to further noise and reduced air quality. Coupled with other developments, such as the controversial Mistra Village project, this will negatively impact the well-being of Xemxija residents. The increased traffic will also place further strain on the local road infrastructure, affecting not only the immediate area but also residents and commuters traveling to Mellieħa or Gozo.

In light of the above, BirdLife Malta strongly objects to PA/05846/24 due to its size and location within the bird sanctuary and Is-Simar's buffer zone. This development contradicts local policies and contributes to the harmful trend of overdeveloping a low-rise residential area. The Planning Authority should not encourage further upscaling in such a sensitive area. We urge the Planning Authority to reconsider the building policies in this region, as they undermine efforts to protect the Natura 2000 site.

BirdLife Malta also calls on the Environment and Resources Authority to ensure the protection of the Is-Simar Natura 2000 site and to discourage any development that encroaches on or impacts the habitats of this site. Protecting these sensitive areas and maintaining appropriate buffer zones is essential for their preservation.