



## **BirdLife Malta's Comments on the Partial Local Plan Review of the Gozo and Comino Local Plan (2006)**

5<sup>th</sup> May 2025

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In response to Phase 2 of the public consultation on the Partial Local Plan Review of the Gozo and Comino Plan of 2006 for Ghajnsielem and Xewkija, BirdLife Malta would like to provide the following comments specifically for the Ta' Passi area in Ghajnsielem:

- While it is noted that site designation tGZ-Ghjn-18 includes measures to minimise light pollution, it lacks any reference to noise pollution. Based on previous environmental impact assessments, average noise levels from any source should not exceed 55 dB over a one-hour period in order to mitigate negative environmental and human impacts.
- The types of recreational activities permitted in the designated area remain undefined, including the expected number of public attendance. We strongly discourage the hosting of large-scale events such as music festivals, which would introduce significant light and noise pollution, thereby undermining the ecological and social value of the site.
- Details on parking arrangements for the proposed recreational area are not provided. We recommend that the development of new land for parking purposes be explicitly discouraged to prevent further land take-up and ecological degradation.

In addition, we propose that this partial local plan review include a complementary proposal to designate the Ta' Passi recreational area, along with the surrounding valley and agricultural land, as a Bird Sanctuary. Such a designation would enhance the ecological value of the site and provide community benefits, aligning with the area's existing designation as a Strategic Open Gap (SOG) under Policy CG25.

Policy CG25 encourages uses that support the protection and enhancement of natural landscapes, the rehabilitation of degraded or abandoned land through habitat restoration and afforestation, the conservation of ecologically sensitive sites, and the continuation of sustainable agricultural activities.

While we acknowledge the inclusion of a policy provision concerning the types of trees that may be planted, we recommend that this be expanded to include comprehensive green infrastructure planning. Specifically, the area should be landscaped with bird-friendly features, incorporating a layered structure of tall trees, understory vegetation,



shrubs, and ground cover. This diversity in vegetation height and structure offers essential habitat components such as nesting sites, perches, and shelter for bird species and other fauna.