



BirdLife Malta objection to proposed excavation of 74 underlying garages on 3 levels and construction of 65 apartments and 9 maisonettes (PA/02900/25)

3rd June 2025

BirdLife Malta objects to PA/02900/25, which proposes the construction of 65 apartments and 9 maisonettes, along with 74 garages spread over 3 basement levels. Our main rationale for objecting is the concurrent submission of two other planning applications in the same area: PA/01396/25 and PA/01397/25. These raise serious concerns about the cumulative social and environmental impacts that the three large developments could have.

The western boundary of PA/02900/25 is less than 5 metres from the eastern boundary of PA/01396/25. More concerning is that the eastern boundary of PA/02900/25 actually overlaps with the western boundary of PA/01397/25. This brings into question whether these applications are truly separate. Furthermore, although each application has been submitted under a different applicant name, all three were prepared by the same architect. This strongly suggests that these developments are being proposed by the same developer but under different applicant names.

Additionally, the site is located very close to protected areas:

- 70 metres from Is-Salini, a Site of Community Importance, MT0000007 (Figure 1)
- 50 metres from Bur Salmastru, Xagħri, Masġar u Steppa fis-Salini, an Area of Ecological Importance and Site of Scientific Importance, as declared in G.N. 402 of 1996 (Figure 2)
- 70 metres from Il-madwar ta' Kennedy Grove u s-Salini, a Bird Sanctuary under S.L. 549.42 (Figure 2)



Figure 1: Proximity of PA/01396/25 to Is-Salini



Figure 2: Proximity of PA/01396/25 to protected areas

BirdLife Malta strongly objects to PA/02900/25 due to its likely significant impact on the adjacent Is-Salini Nature Reserve and its protected wildlife. The proposed development, which exceeds the five-floor building height limit set by the North West Local Plan (Map



42), raises major concerns, especially when considered alongside the two adjacent applications. The cumulative scale and proximity of these developments pose a serious threat to the integrity of the nearby protected areas.

The cumulative construction noise risks exceeding thresholds known to disturb birds nesting and resting in the reserve. In addition, the developments are likely to contribute to light pollution that would conflict with ERA's 'Guidelines for the Reduction of Light Pollution in the Maltese Islands' and BirdLife Malta's 'Guidelines for Ecologically Responsible Lighting'. Not to mention that that visual amenity of the nature reserve would also be compromised.

In light of the above, BirdLife Malta strongly opposes PA/02900/25 due to the apparent link between this application and the two adjacent ones. We are particularly concerned that these three applications may represent project fragmentation intended to bypass proper environmental scrutiny. We urge the Planning Authority to investigate these cases and assess them collectively as a single development to fully evaluate their environmental impact. The scale of the proposed development, its cumulative impact with the neighbouring applications, and its close proximity to ecologically sensitive and protected areas pose a significant threat to local biodiversity and habitat integrity.