

## BirdLife Malta objection to the construction of bungalows with pools for tourist accommodation, Żurrieq (PA/04861/25)

9th September 2025

BirdLife Malta objects to this planning application for the reasons listed below.

This development is proposed in a highly sensitive environment, surrounded by protected cliffs and garrigue habitats which are relatively undisturbed. The site borders/lies within the following protected areas:

- Area of High Landscape Value and Ecological Importance under G.N. 400 of 1996: Diversi irdumijiet (link)
- Special Protected Area under the Birds Directive: Rdumijiet ta' Malta: Ix-Xaqqa sa Wied Moqbol (MT0000031)
- Site of Community Importance under the Habitats Directive: Rdumijiet ta' Malta: Ir-Ramla taċ-Ċirkewwa sal-Ponta ta' Bengħisa (MT0000024)

The proposed tourist accommodation would permanently alter the use of this undisturbed area, introducing multiple anthropogenic pressures. These include increased illumination, noise, and vehicular access, and increased visitor pressure in the area - all of which would disturb the natural character of the site. Further disturbance is expected through outdoor events, while the intensification of commercial activity at basement level (gym, indoor pool, sauna, garbage rooms, maintenance/housekeeping, and other services) will add to the impact.

The cliffs immediately below the proposed development, forming part of Wied Babu, host a colony of 20–30 breeding pairs of Yelkouan shearwater (*Puffinus yelkouan*), a seabird protected under Annex I of the EU Birds Directive<sup>1</sup>. This nocturnal species is highly sensitive to light pollution. A locally conducted study on the effects of ship lighting near coastal cliffs found that increased illumination increased cliff-face brightness and reduced the number of birds entering colonies per hour. Such disruption of natural attendance patterns can have both short- and long-term consequences for breeding success, physiological condition, and overall colony viability<sup>2</sup>.

<sup>&</sup>lt;sup>1</sup> Metzger, B & Austad, M. (2021). SEABIRD FIELDWORK REPORT 2021. BirdLife Malta. https://era.org.mt/wp-content/uploads/2022/11/Seabird-Fieldwork-Report-2021-public.pdf.

<sup>&</sup>lt;sup>2</sup> 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.



Given the site's ecological sensitivity, its designation under multiple levels of national and EU protection, and the presence of a breeding colony of the Yelkouan shearwater, the proposed development is wholly incompatible with the area. The introduction of permanent infrastructure and associated human activity would irreversibly damage the natural environment, intensify pressures on protected habitats, and undermine Malta's obligations under the EU Birds and Habitats Directives. BirdLife Malta therefore strongly objects to this application and urges that it be refused in order to safeguard the ecological integrity and legal protection of the site.