

**BirdLife Malta objection to alterations to existing building, including demolition works as well as an overlying extension creating four apartments in Xlendi (PA/00199/26)**

20th February 2026

BirdLife Malta hereby formally submits its objection to this planning application on the grounds outlined below.

The proposed development lies adjacent to the Natura 2000 site *L-Inħawi tax-Xlendi u tal-Wied tal-Kantra* (MT0000020), with a small portion of the site footprint falling directly within its boundary. This protected area is designated for its internationally important habitats, including Thermo-Mediterranean and pre-desert scrub (Habitat 5330) and Endemic phryganas of the Euphorbio-Verbascion (Habitat 5430), both of which occur in the immediate vicinity of the proposed development (Figure 1).

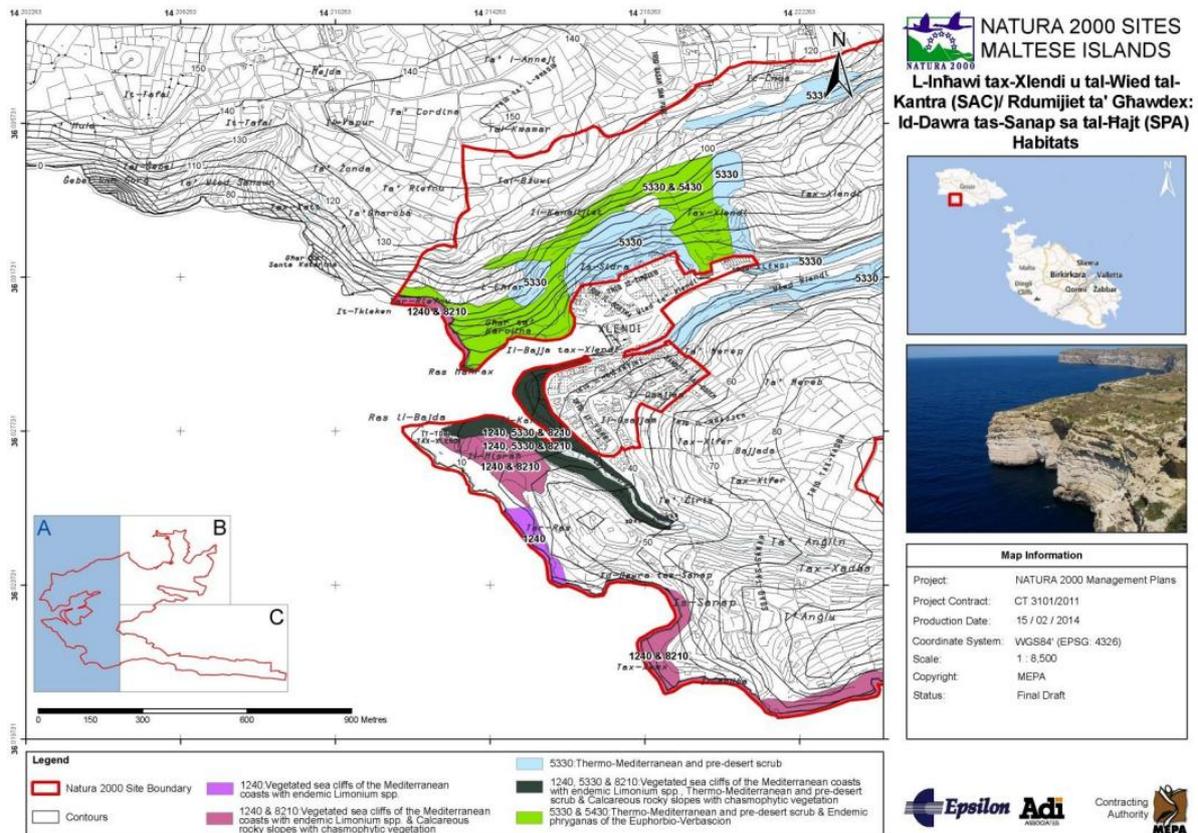


Figure 1: *L-Inħawi tax-Xlendi u tal-Wied tal-Kantra* habitats map (Source: [https://era.org.mt/wp-content/uploads/2019/05/L-Inħawi\\_tax-Xlendi\\_ManagementPlan.pdf](https://era.org.mt/wp-content/uploads/2019/05/L-Inħawi_tax-Xlendi_ManagementPlan.pdf))



The scale and location of this development are also of particular concern given the presence of a breeding colony of Scopoli's Shearwater (*Calonectris diomedea*) along the same stretch of cliffs. This colony is part of the Natura 2000 site *Rdumijiet ta' Ghawdex: Il-Ponta ta' Harrux sal-Bajja tax-Xlendi* (MT0000029), where it is estimated that approximately 100–150 breeding pairs of *C. diomedea* occupy the area annually between February and October<sup>1</sup>. The cliffs also constitute an adequate habitat for a number of other protected, breeding bird species, including the Blue Rock Thrush (*Monticola solitarius*)<sup>2</sup>

Scopoli's shearwaters, designated as Annex I species under the Birds Directive, are known to be highly sensitive to disturbance, particularly from noise and artificial lighting. The construction phase of a development of this magnitude will inevitably generate significant noise pollution, while the operational phase will introduce sustained increases in light and human activity. This is especially problematic in an area such as Xlendi, which is already characterised by high levels of urbanisation, tourism and limited spatial capacity.

Scientific evidence consistently demonstrates the adverse effects of disturbance on shearwaters. For instance, chick-provisioning visits by Scopoli's Shearwaters have been shown to decrease during periods of noise-inducing human activity, indicating that acoustic disturbance can negatively impact parental care and, consequently, breeding success in *C. diomedea*<sup>3</sup>.

Artificial lighting presents an equally serious threat. Poorly designed lighting schemes, particularly those involving excessive use of bright white LEDs, can have severe ecological consequences. Fledgling seabirds are attracted to artificial lights when departing their nests at night, often resulting in grounding and high mortality rates<sup>4</sup>. Additionally, adult shearwaters have been observed to reduce colony attendance when cliff faces are illuminated, likely as a predator-avoidance response. Local research has demonstrated that increased light intensity significantly reduces colony attendance by a shearwater colony, with potential short- and long-term implications for

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<sup>1</sup> Metzger, B. & Austad, M. (2021) SEABIRD FIELDWORK REPORT 2021. [https://era.org.mt/wp-content/uploads/2022/07/GF-Admin-48-2020\\_Fieldwork\\_Report\\_final.pdf](https://era.org.mt/wp-content/uploads/2022/07/GF-Admin-48-2020_Fieldwork_Report_final.pdf).

<sup>2</sup> STANDARD DATA FORM. [https://era.org.mt/wp-content/uploads/2019/05/20180601\\_MT0000029-Harrux-Xlendi-SPA.pdf](https://era.org.mt/wp-content/uploads/2019/05/20180601_MT0000029-Harrux-Xlendi-SPA.pdf).

<sup>3</sup> Cianchetti-Benedetti, M., Becciu, P., Massa, B. & Dell'Omo, G. Conflicts between touristic recreational activities and breeding shearwaters: short-term effect of artificial light and sound on chick weight. *Eur. J. Wildl. Res.* 64, 19 (2018).

<sup>4</sup> Rodríguez, A., Rodríguez, B., & Negro, J. J. (2015). GPS tracking for mapping seabird mortality induced by light pollution. *Scientific reports*, 5(1), 10670.

breeding success, physiological condition, and overall colony viability<sup>5</sup>. Any additional light pollution arising from the proposed development would further contribute to the existing skyglow emanating from Xlendi Valley. Indeed, data on seabird groundings in the Maltese Islands identify the Xlendi area as one of the principal hotspots for light-induced seabird grounding incidents, as illustrated in Figure 1 below.

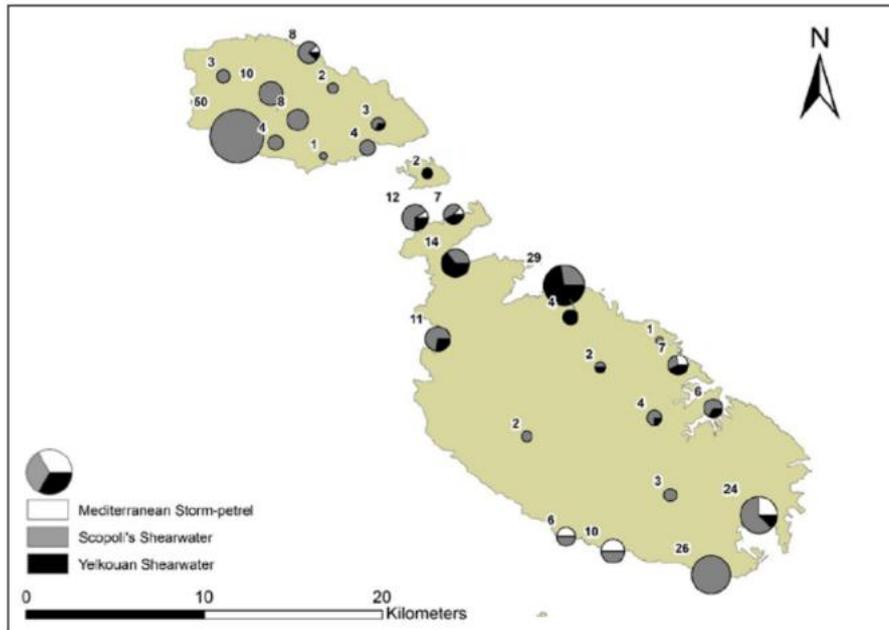


Figure 2: Locations of recorded light-induced grounding cases per species<sup>6</sup>

In light of the above, BirdLife Malta considers that the proposed demolition works and overlying extension at Xlendi (PA/00199/26) would result in unacceptable impacts on the adjacent Natura 2000 sites MT0000020 and MT0000029, as well as on the breeding colony of Scopoli's Shearwater and other protected species reliant on the surrounding cliffs. The anticipated increase in noise, light pollution, and human activity is incompatible with the conservation objectives of these protected areas.

BirdLife Malta therefore urges the Planning Authority to refuse this application in order to safeguard the ecological integrity of the site and its protected species.

<sup>5</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.

<sup>6</sup> Crymble, J., Mula-Laguna, J., Austad, M., Borg, J. J., Sultana, J., Barbara, N., ... & Metzger, B. (2020). Identifying light-induced grounding hotspots for Maltese seabirds.