



BirdLife Malta Objection to 'Proposed demolition of existing structures. Proposed excavation and construction of 12 bungalow with basement garages, underground driveway and administration building', San Pawl Il-Baħar (PA/03389/09)

20/04/2026

BirdLife Malta hereby submits its objection to application PA/03389/09, which seeks approval for the construction of 12 bungalows, basement garages, an underground driveway, and an administration building.

The site in question lies within an Outer Development Zone (ODZ), outside the Limit to Development Boundary (NWUS 1) as defined in the North West Local Plan. Of particular concern is its direct proximity to the terrestrial Natura 2000 site Ix-Xagħra tal-Kortin (MT0000010), which is designated for the presence of internationally important habitats.

The garrigue habitat at Ix-Xagħra tal-Kortin supports several species of conservation importance. These include the shrubby *Convolvulus oleifolius*, which is protected through national legislation and listed in the National Red Data Book due to its phytogeographical significance and restricted Mediterranean distribution. *Phagnalon graecum* subsp. *ginzbergerii*, another species with a limited Mediterranean range, is also present. Furthermore, orchid species such as *Anacamptis urvilleana* and *Ophrys melitensis* have been recorded in the area. The maquis habitat is dominated by the Carob tree (*Ceratonia siliqua*), which is likewise protected under national legislation.

The construction and operational phases of the proposed development, given their close proximity to this protected site, are likely to adversely impact its integrity. The area is characterised by a coastal landscape with a well-preserved boulder scree community. These habitats remain in a largely pristine condition due to their relative inaccessibility. The proposed excavation works for underground garages and the driveway raise serious concerns regarding impacts on the geomorphology of the area, particularly the stability of the boulder scree systems that support rare and important species. Additional impacts, such as increased trampling, also pose a threat to the surrounding garrigue and boulder-scree community.

It is also important to note that the site has remained disused and abandoned for several decades, with only the boundary walls of the former British Petroleum plant separating it from the adjacent Natura 2000 site. Over time, the area has been naturally



recolonised by native flora and fauna, effectively allowing it to function as an extension of the Natura 2000 site. Rather than being considered disturbed land, the site should be recognised as an important ecological corridor and buffer zone between the development zone and the Natura 2000. The site in itself is also a good candidate for nature restoration and it should be determined if the area merits further protection under Regulation (EU) 2024/1991 on Nature Restoration, and which could potentially result in the expansion of the Natura 2000 site.

In addition, the proposed development risks becoming a new source of light pollution, contributing to the already elevated levels of skyglow emanating from the St Paul's Bay area, which is heavily illuminated. It would also introduce noise pollution from residential activity, potentially spilling over into the Ix-Xagħra tal-Kortin Natura 2000 site.

Moreover, the site lies approximately 1 km from a colony of Yelkouan shearwaters on Selmunett, which is designated as a Special Protection Area and forms part of the Natura 2000 network (Il-Gżejjer ta' San Pawl (Selmunett) – MT0000022). Any increase in artificial lighting poses a significant risk to this species, as fledglings are attracted to light sources when leaving their nests, often becoming disoriented and grounding, thereby reducing their chances of survival. Light pollution from nearby human activity may also disrupt breeding behaviour, potentially leading to colony abandonment and/or interference with chick provisioning¹.

Notwithstanding the above, the proposed development would also result in increased traffic generation. Xemxija is already well known for experiencing significant seasonal traffic congestion, and the addition of residential units would exacerbate existing pressures. This is further compounded by cumulative impacts from other proposed developments in the area, including the ex-Mistra Village project. Such increases in traffic would not only negatively affect the wellbeing of local residents but would also place additional strain on the existing road infrastructure, with wider implications for connectivity towards Mellieħa, Gozo, and other parts of the island.

In light of the above considerations, and foremost among them the fact that the site lies within an ODZ, the proposed development is considered to pose significant environmental and infrastructural impacts and should therefore be refused.

¹ <https://era.org.mt/wp-content/uploads/2021/03/Selmunett-SPA-Designation-Report-1.pdf>