



BirdLife Malta's comments on PA 05313/20
Construction of greenhouses and solar farm, Mgarr
22 September 2021

BirdLife Malta has reviewed the documents presented publicly on the Planning Authority's website for public consultation with regards to PA 05313/20 Construction of greenhouses and solar farm in Mgarr, and would like to submit our comments as follows.

We find the Project Description Report in question as poor in detail and disregarding a number of crucial aspects which at the very least warrant this development to be screened for the potential impacts it would cause in terms of the need for an Environmental Impact Assessment. The area for the proposed development is significant, in addition the project proposes to transform land of agricultural and ecological value into an industrial development of greenhouses and solar farms. Even though the concept of renewable sources of energy, in this case solar, may be considered a positive prospect for energy generation and distribution, this should not deter from the very fact that this development is being proposed in an Outside Development Zone (ODZ) area and will consume a significant amount of land, without even looking at alternative (possibly already impacted and urbanised) sites for the development of such a venture.

The proposed development is non-conformant to a number of policies which it disregards:

- The area for the proposed development is located within the scope of the North West Local Plan, although the Project Description Report (PDR) states that "the area and its surroundings are outside" this plan. The total area of the site exceeds 43 000 m² and is considered of a significant footprint.
- The PDR characterizes the area as an "empty plot of land currently not used". In this context, it is crucial to mention that the local plan identifies the territory, within which the development falls, as an Area of Agricultural Value (NWAG 1), as well as an Area of Archaeological Importance. The Local Plan emphasizes the importance to protect areas of agricultural value from inappropriate development and discourage the fragmentation of land (provision 4.4.1). Overall, the Plan adopts "a restrictive approach to development in the countryside".
- Provision 4.1.3 of the Local Plan clearly outlines the priorities for the ODZ land: "the strategy for settlements located outside the development zone (ODZ) seeks to encourage the consolidation, conservation, and rehabilitation, of relatively large settlements located within the wider rural areas through rural sustainable development without permitting development within them which will lead to the loss of their rural character". Given the scale of the proposed development, we believe it



will inevitably lead to the loss of rural character of the area. Apart from being situated within ODZ, the site boundaries overlap with the Open Space Gap between Mgarr and Zebbiegh. Such areas are vital to keep open and undeveloped to restrain the urbanization process in the countryside and preserve the rural environment and biodiversity.

- The project also does not align with the Policy 2.11 on Small Scale Photovoltaic Panels that allows solar panels on rural buildings (including greenhouses) only if they are small-scale and do not create a visual impact, which is not the case for PA 05313/20. Another missing point in the PDR is that it does not clearly specify the management system for the run-off water, including water that would be used for cleaning the photovoltaic panels.

The PDR minimises the site's terrestrial ecology the potential impact on which is termed as non-applicable. The development would cause the felling of trees and shrubs as already plotted by ERA. According to the Eurostat, only 1% of Maltese territory is afforested, and sacrificing of trees should not contribute to this drastic statistics. In addition, the demolition of rubble walls is also proposed by the developer; yet the provision 8.1.10 of the Local Plan stresses on the need to preserve and give special attention to traditional rubble walls (in line with NWCO 14). Rubble walls are protected by legislation in view of their historical and architectural importance, their exceptional beauty, a habitat for flora and fauna, and their vital importance in the conservation of the soil and water (provision 14.9.5 of the Local Plan). In an area where we consider re-wilding as the sound solution to mitigate climate change, the concept of using relatively pristine land to construct a solar farm, while tagging the impact on terrestrial ecology as non-applicable, is unconceivable.

The project suggests placing of the photovoltaic modules on top of the greenhouses, which will make the whole concept of a greenhouse obsolete, since illumination of the same greenhouses will be reduced. This puts to question the feasibility and integrity of the project. While it is common knowledge that solar panels have a definite life-time the PDR acknowledges such stating that the area will be returned to previous form after this is decommissioned. The very fact that ODZ land will be compromised for a development which has a definite expiry makes the whole undertaking less justifiable and elicits the question whether such a development application is being filed for speculation purposes.

To sum up, BirdLife Malta would like to express its concern and reservations with regards to the proposed development, which we believe is inappropriate for the area in question. Both the nature and the scale of the project contradicts the rural character of the area and contributes to further loss and fragmentation of arable land. Moreover solar farm installations have a limited life-time which do not justify the uptake of more arable land and land of



ecological value for such a purpose, and which further risks the area being proposed for further development in a future scenario.

The development in question should therefore not be considered favourable, and if the developer shall contest such a matter and seek to get approval of such a planning application, the application must be at the very least subject to an Environment Impact Assessment which should ascertain (without the bias expressed in the PDR) the impacts concerning the following criteria:

- Impact on land use and potential use of agricultural land in the area;
- Impact on archaeology at the site and surrounding areas;
- Impact on the ecology of the site;
- Impact on the geology and hydrogeology of the area;
- Impact on expected traffic generation during construction and operational phases of the development;
- Assessment of alternative sites for the development;
- Waste generation impact including what will happen to solar panels once these would be decommissioned.

ENDS