



BirdLife Malta objection to the construction of an underground water reserve and rubble wall in Żebbuġ, Gozo (PA/02689/25)

30th May 2025

BirdLife Malta objects to Planning Application PA/02689/25, which seeks permission for the construction of an underground water reservoir and rubble wall. While we hold no objection to the development of such infrastructure when genuinely intended for agricultural purposes, in this case, the context surrounding the application raises serious concerns regarding its legitimacy and intended use.

In 2023, BirdLife Malta filed a report with the Planning Authority concerning apparent illegal excavation works on the site in question (CRM1703/23). Following this complaint, the Planning Authority informed us that works had ceased as of 13/09/2023 and that the site owner intended to sanction the works done by submitting an application. However, we note with concern that a formal Stop or Enforcement Notice was never issued, and our requests for clarification on this matter remain unanswered.

Subsequent investigations revealed that the site had been extensively excavated, creating what appears to be a large artificial pond - an activity that lacks planning consent. Such ponds have in the past been associated with illegal hunting practices, particularly targeting wading birds. A photograph of this pond, included in Document 13j of the application, clearly illustrates the scale of the excavation and the attempts to simulate a natural water body through planted grasses.

Last year, application PA/03185/24 was submitted to sanction this pond. In its assessment, the Environment and Resources Authority (ERA), in Document 68a, expressed significant environmental concerns, noting that “the scale and nature of the works carried out on site are considered to be excessive and have led to drastic interventions.” ERA concluded that the application was “objectionable from an environmental point of view”. This application was later withdrawn and subsequently replaced by the current application, PA/02689/25.

The current application appears to present the same structure under a different guise. Document 1h includes existing plans showing the pond in question, despite its lack of formal approval. However, in the updated plans (Document 13a), the pond is no longer visible and has instead been replaced by a reference to “Water Runoff.” The rationale behind this alteration is unclear and raises further questions: Is the pond being rebranded as a water runoff area feeding into an underground reservoir? What purpose will this “runoff” area serve, and why was it introduced only in the revised plans?



In view of the above, BirdLife Malta strongly objects this application. Instead, we urge the Planning Authority to reject this application. To approve this application in its current form and context, would undermine the Authority's enforcement responsibilities and suggesting tolerance of unauthorised development in sensitive environments. We recommend that the applicant be required to restore the site to its natural state. Only after ecological recovery has been demonstrated should consideration be given to constructing a water reservoir - strictly for agricultural use. Furthermore, any such development should be subject to close monitoring both during and after construction, to ensure compliance.