

**BirdLife Malta objection to proposed reinstatement and construction of rubble walls; proposed pump room and underground water reservoir on an agricultural land, Fontana (PA/00176/26)**

20th February 2026

BirdLife Malta hereby formally submits its objection to application PA/00176/26 on the grounds set out below.

The proposed reservoir is located within the boundaries of the Natura 2000 site **L-Inħawi tax-Xlendi u tal-Wied tal-Kantra (MT0000020)**. This protected area is designated for its internationally important habitats, including Thermo-Mediterranean and pre-desert scrub (Habitat 5330) and Olea and Ceratonia forests (Habitat 9320), both of which occur in the immediate vicinity of the proposed water reservoir (Figure 1). The Management Plan for MT0000020 identifies Habitat 5330 as being in an excellent state of conservation, with the best examples occurring at Wied Xlendi; accordingly, development in close proximity to such high-quality habitat would pose a significant threat to its integrity.

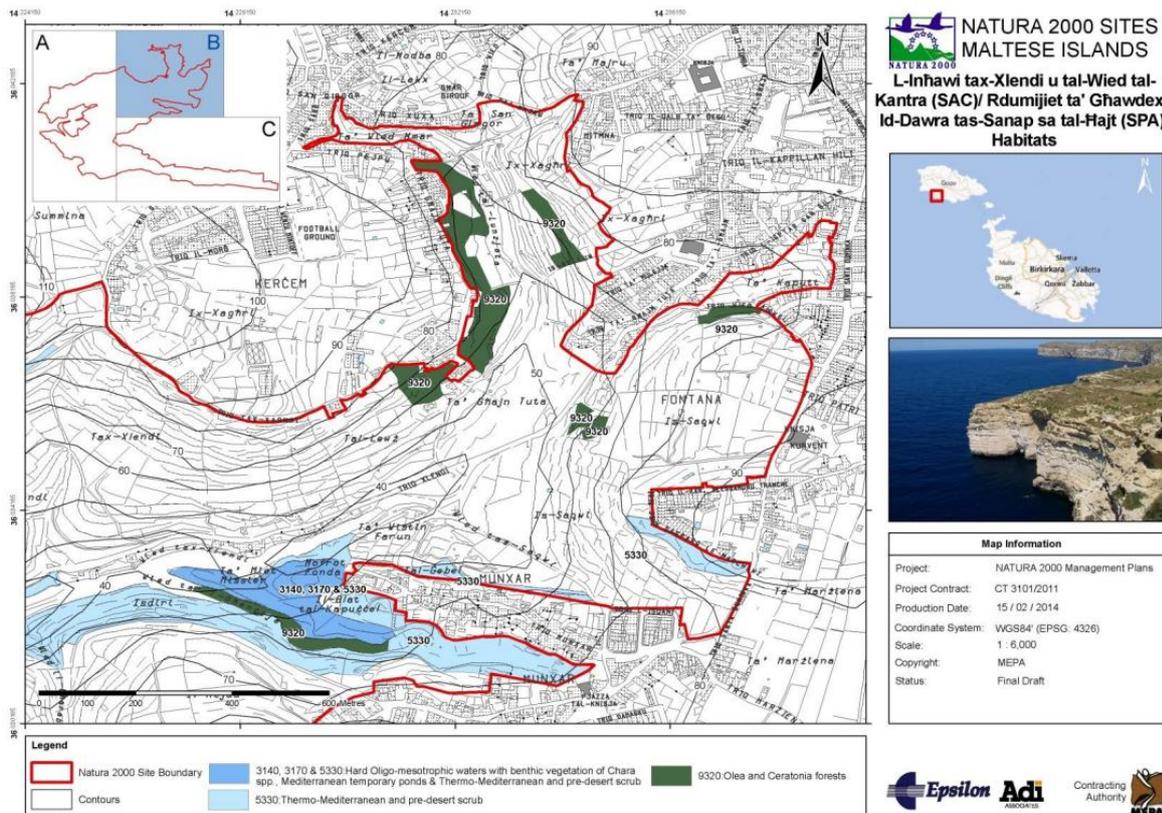
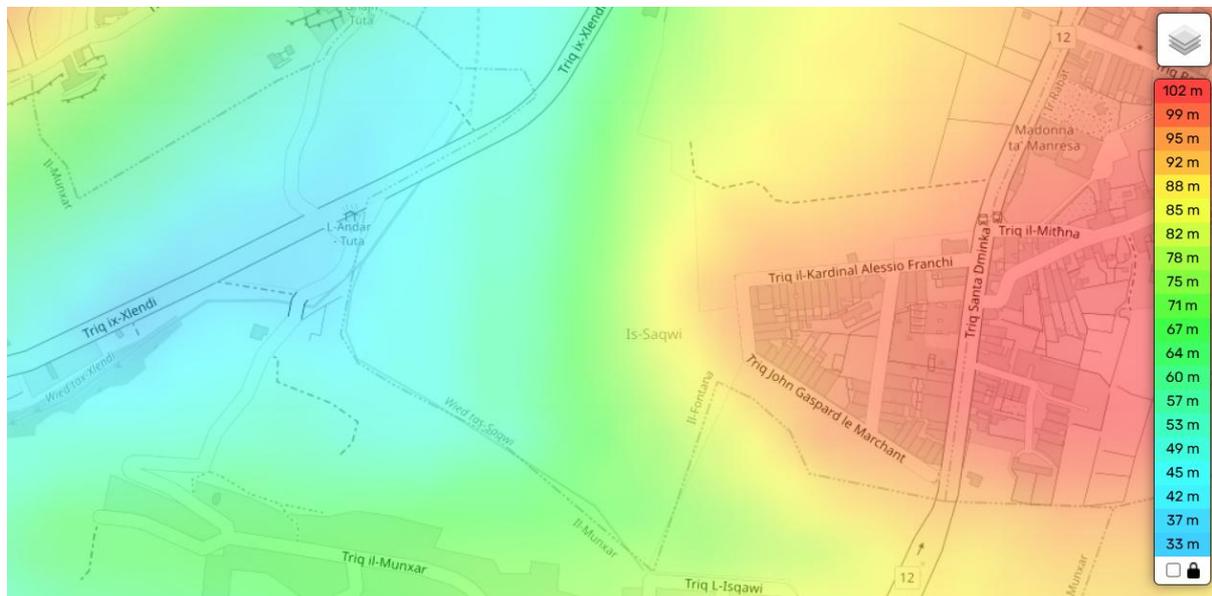


Figure 1: L-Inħawi tax-Xlendi u tal-Wied tal-Kantra habitats map (Source: [https://era.org.mt/wp-content/uploads/2019/05/L-Inħawi\\_tax-Xlendi\\_ManagementPlan.pdf](https://era.org.mt/wp-content/uploads/2019/05/L-Inħawi_tax-Xlendi_ManagementPlan.pdf))

Constructing a water reservoir of this scale would disrupt the natural hydrological processes of Wied tax-Xlendi. A review of the topographic map of Wied ix-Xlendi shows that the proposed development site falls within the catchment area of Wied tax-Xlendi, indicating that it plays a direct role in the valley's water dynamics (Figure 2).



*Figure 2: Topographic map of the Wied tax-Xlendi area and the proposed water reservoir  
(Source: <https://en-sg.topographic-map.com/>)*

Furthermore, under the recently enacted **Nature Restoration Law (Regulation (EU) 2024/1991)**, this Natura 2000 site should not merely be protected but actively restored from its degraded condition. Effective restoration of a valley necessarily involves reinstating its natural hydrological processes. The proposed reservoir would undermine these objectives by interfering with the valley's ecological and hydrological functioning.

Due to the protection status of the site in question, the proposal is therefore contrary to **Policy 2.7A** of the **Rural Policy and Design Guidance 2014 (RPDG)**, which states that water reservoirs and/or pump rooms are not acceptable on sites that support important natural habitats. This policy also considers scheduled locations as inappropriate for such development. Given that the site lies within a protected landscape designation, the proposal directly conflicts this policy.

The proposal is also contrary to Policies 1.2F, 1.2G and 1.2H of the RPDG, which require that rural development does not adversely impact landscape features, ecological value, rural character or site integrity. The scale and configuration of the proposed reservoir and associated works fail to meet these requirements.



The size of the proposed reservoir is excessive when considered in relation to the limited size of the field. The scale of the structure is disproportionate and results in overdevelopment of the rural parcel, contrary to the principle of minimal intervention in the countryside as required by the RPDG.

The site also lies within an **Area of High Landscape Value (AHLV)** as designated in the Gozo and Comino Local Plan. In terms of Policy GZ-RLCN 1 (Rural Landscape Conservation Areas) and Policy GZ-RLCN 2 (Areas of High Landscape Value), development within such areas must not adversely affect landscape character, traditional rural morphology or visual integrity. The proposal introduces a structure and associated interventions that alter the established terraced configuration of the site and fragment the existing field pattern.

The argument that the land has limited agricultural value would not justify the intervention. Within an AHLV, landscape protection is the primary consideration. The policy framework does not support development that compromises protected landscape character on the basis of agricultural productivity.

The proposal also contradicts **the Strategic Plan for Environment and Development (SPED)**, in particular **Rural Objective RO1** and the Landscape policies, which require the safeguarding of rural landscapes, the protection of characteristic landforms and terraced field systems, and the avoidance of interventions that undermine the integrity of protected countryside.

In addition to the above, the site photographs indicate that access is taken through a road constructed after 1998 which appears to be illegal (Figure 2). This access is being used to serve a subdivided site. The Authority should verify the legality of this access and should not approve development that relies on unauthorised infrastructure.



Figure 3: Proposed water reservoir and access road (Top Left), 1968 Survey Sheets (Top Right), Orthos 1998 (Bottom) (Source: pamapserver.pa.org.mt)

### Concluding Remarks

In light of the above, the proposed development is clearly incompatible with the ecological, hydrological and landscape sensitivities of the site, as well as with the applicable policy framework at local, national and European levels. The proposal would result in disproportionate and unjustified intervention within a protected Natura 2000 site and Area of High Landscape Value. BirdLife Malta therefore requests that application PA/00176/26 be refused.