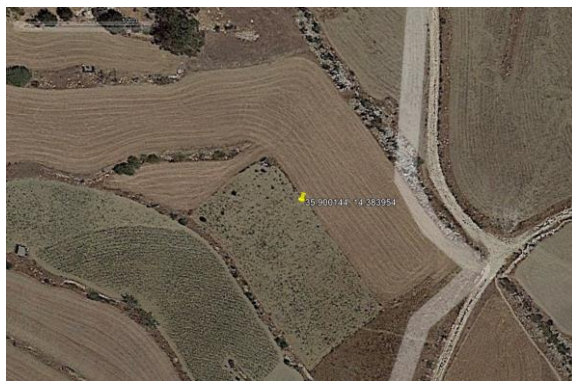


BirdLife Malta objection to underground reservoir and to sanction existing pump room (PA/02643/26)

29/05/26

BirdLife Malta objects to Planning Application PA/02643/26, which seeks permission for the construction of an underground reservoir and to sanction an existing pump room. While BirdLife Malta holds 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.

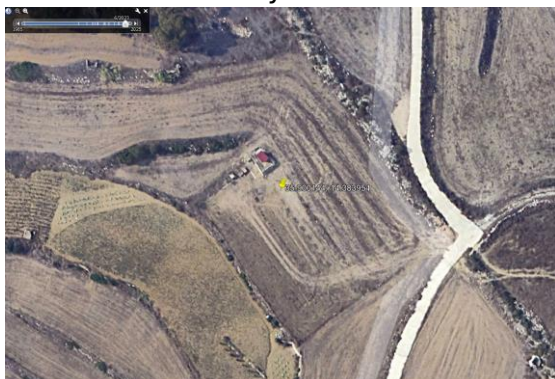
In April 2025, BirdLife Malta filed an illegality report with the Planning Authority concerning a water pond and structure built without permits on site (CM/387/25). Satellite imagery on Google Earth shows that the pond was not present prior to May 2024. In May 2021 there was no structure or pond on site, however, from April 2023 to June 2023, a structure appears which subsequently increases in size. The May 2024 satellite imagery shows the structure completed with a water pond.



May 2021



April 2023



June 2023



May 2024

In 2025, BirdLife Malta took photographs of the artificial water pond. Such ponds have in the past been associated with hunting practices. The photograph below clearly illustrates that the site has been excavated to create and simulate a natural water body. Current satellite imagery seemingly shows that the water pond is no longer present or has since dried up. Nonetheless, the structure still stands, and the applicant is seeking the sanctioning of this structure as a 'pump room'. The legitimacy of its use as a pump room raises serious doubts, especially considering its association with the artificial pond and its apparent function as a bird hide.



Providing permission to this application would contradict and breach the Protection of Agricultural Land Regulations (2025) under the Agriculture Act (Cap. 639), where Article 5 states that:

“Farmers or valid title holders shall ensure...that no activity which makes soil unsuitable for agricultural use is undertaken, including but not limited to the following: covering soil with any layer of concrete, stones, stone slabs or any other similar material...construction of structures not essential to the needs of agriculture except if such structures are permitted according to applicable planning policies”

Given that the 'pump room' has been built without permission and appears to have been constructed for the purpose of serving as a bird hide rather than for agricultural use, sanctioning this structure would constitute a direct breach of the above regulations.

In view of the above, BirdLife Malta strongly objects to this application and urges the Planning Authority to reject it. Approval in its current form and context would undermine the Authority's enforcement responsibilities and suggest tolerance of unauthorised development in rural areas. BirdLife Malta recommends that the applicant be required



to restore the site to its natural state and any development permission should not be issued until all illegalities are removed. Furthermore, any development on site should be subject to close monitoring both during and after construction to ensure full compliance.