



Birdlife Malta objection to “install an environmentally friendly, ground-mounted, photovoltaic solar farm on a vacant plot, and construction of structures to house any necessary services within the complex itself” at Ta’ Kuljat, Żebbuġ, Gozo (PA/03747/26)

10/07/26

BirdLife Malta hereby submits this representation in relation to PA/03747/26, which seeks approval for the development of a solar farm and associated service infrastructure on approximately 27,360 square metres of pristine natural land at Ta’ Kuljat, Żebbuġ, Gozo. BirdLife Malta strongly objects to this proposal on the grounds outlined below.

1. Conflict with the Solar Farms Policy (2021)

The Planning Authority’s Solar Farms Policy (2021) establishes the criteria governing the location of solar farm developments, with the primary objective of facilitating renewable energy generation while safeguarding undeveloped and environmentally sensitive land.

In accordance with this policy, photovoltaic installations exceeding a footprint of 1,000 square metres located in an Outside Development Zone (ODZ) are subject to its provisions. Therefore, the current proposal must be assessed against the requirements and restrictions established under the Solar Farms Policy.

Section 5.2 of the policy identifies the locations considered suitable for solar farm development, including large-scale rooftops, quarries, and areas already accommodating industrial activities. These locations are prioritised precisely because they minimise the take-up of undeveloped land and avoid unnecessary impacts on rural landscapes.

Section 5.3 explicitly states that “proposals for the development of solar farms shall not be approved on any sites, other than the appropriate sites described under 5.2”. The same section identifies locations where solar farm developments should not be permitted, including open countryside, Natura 2000 sites, agricultural land, garrigue (xagħri), maquis, protected or scenic areas, scheduled areas, and other environmentally sensitive locations.

The site subject to PA/03747/26 consists of pristine garrigue of significant ecological value. The area is scheduled as Level 2 or higher – Ecology under Policy GZ-RLCN-1 of



the Gozo and Comino Local Plan (GCLP), as identified in Map 13.1-A. These designations recognise the ecological importance and sensitivity of this landscape.

Given that the proposed solar farm would be located directly on pristine garrigue and a scheduled area, the site does not fall within the appropriate locations identified under Section 5.2 of the Solar Farms Policy. Consequently, in accordance with Section 5.3, the proposal should not be considered acceptable and should be rejected.

2. Conflict with the Gozo and Comino Local Plan (GCLP)

The proposed development site is located within an Outer Development Zone (ODZ), as identified in Map 14.14-C1/D1 of the Gozo and Comino Local Plan (GCLP). ODZ areas are afforded a heightened level of protection, with a general presumption against large-scale development. Furthermore, the site falls within the scope of Policy GZ-RLCN-1 of the GCLP, which specifically seeks to safeguard areas of ecological importance, including sensitive garrigue habitats. The proposed development would result in the transformation of a pristine natural area into a large-scale infrastructure installation, contrary to the objectives of this policy.

Additionally, Policy GZ-RLCN-3 establishes a general presumption against development on garrigue areas in Gozo and Comino. A development of the scale and nature proposed under PA/03747/26 is fundamentally incompatible with this policy objective and should therefore be refused.

The Planning Authority has previously refused a comparable proposal involving a large-scale solar farm on ODZ agricultural land at Mgarr (PA/05313/20). That application, covering approximately 44,500 square metres, was refused by the Planning Board on 3 March 2022. The reasons for refusal are highly relevant to the current proposal, particularly in relation to the inappropriate siting of large-scale solar infrastructure within rural landscapes and in ODZ.

Among the considerations leading to refusal was the proposal's conflict with the Solar Farms Policy, which directs such developments towards appropriate locations rather than open countryside. This decision establishes a clear planning approach whereby renewable energy infrastructure cannot be justified at the expense of sensitive rural landscapes when more suitable alternatives exist.

3. Conflict with the Strategic Plan for the Environment and Development (SPED)

The proposed development is also inconsistent with the Strategic Plan for the Environment and Development (SPED), which establishes the overarching principles for sustainable spatial planning in Malta. The SPED identifies the site as falling within an



Area of High Landscape Protection under the Rural Area Policies. Such areas are recognised for their landscape, ecological, and rural character, and the SPED establishes a clear presumption against unnecessary development in these locations.

The introduction of a large-scale solar farm on pristine ODZ land in Gozo would undermine the SPED's fundamental objectives of protecting rural character. This is particularly significant in the context of Gozo, which the SPED recognises as requiring a heightened level of protection due to its unique environmental and landscape characteristics, referring to it as an 'ecological island'.

The proposed development is contrary to Thematic Objective 1 of the SPED, which states that socio-economic development must ensure that rural areas are not exploited by uses that are neither legitimate nor necessary. It also conflicts with Rural Objective 4, which seeks the protection of the most sensitive landscapes of natural beauty. Furthermore, while the SPED recognises the importance of addressing climate change and increasing renewable energy generation under Thematic Objective 9, it does not support renewable energy development at any cost. Rather, it directs large-scale solar farm developments towards locations identified through the Solar Farms Policy, reinforcing the requirement that such infrastructure is appropriately sited and does not compromise environmentally sensitive areas.

Concluding remarks

In conclusion, PA/03747/26 represents an inappropriate and unjustified form of development that conflicts with the Solar Farms Policy, the Gozo and Comino Local Plan, and the Strategic Plan for the Environment and Development. While renewable energy generation is essential, it must be pursued through responsible spatial planning that prioritises suitable locations. The proposed solar farm would result in the unacceptable transformation of protected garrigue within an ODZ area, undermining established planning policies and setting an undesirable precedent for future development. BirdLife Malta therefore strongly urges the Planning Authority to refuse this application.