

Objection to PA 4933/22
Proposed demolition and reconstruction of the ex-Festival hotel
within l-Inhawi tal-Ghadira Natura 2000 site
 30th September 2022

BirdLife Malta has reviewed the documents available online on the Planning Authority's website with respect to PA 4933/22 which is proposing the demolition of the ex-Festival hotel structure and its replacement with a 5-floor level hotel with ancillary facilities such as a pool, restaurants, parking spaces, etc. The development runs counter to various designations relating to the natural and amenity value of the area as well as counters a number of policies and plans set out for the area in past years, as is further explained as follows.

Environmental context

The development is proposed within a **Natura 2000 site** - the designated SAC-SPA *L-Inhawi tal-Ghadira* MT0000015; which is recognised for its important flora, fauna and habitats and also has varying levels of protection as an Area of Ecological Importance, a Site of Scientific Importance (*L-Inhawi ta' l-Ghadira mill-Bajja tal-Mellieha saċ-Ċumnija fil-Mellieha*), as well as a Bird Sanctuary.

Despite these designations which cover the wide area of 'L-Inhawi tal-Ghadira', the specific location of the proposed development at the ex-hotel site had been scheduled as a **Level 1 Site of Scientific and a Level 2 Area of Ecological Importance** by MEPA in 2006 via Government Notice 491 of 2006¹. Even though the hotel had already been built and abandoned, MEPA had recognised the scientific and ecological importance of the area with the existing abandoned structure there (See Figure 1).

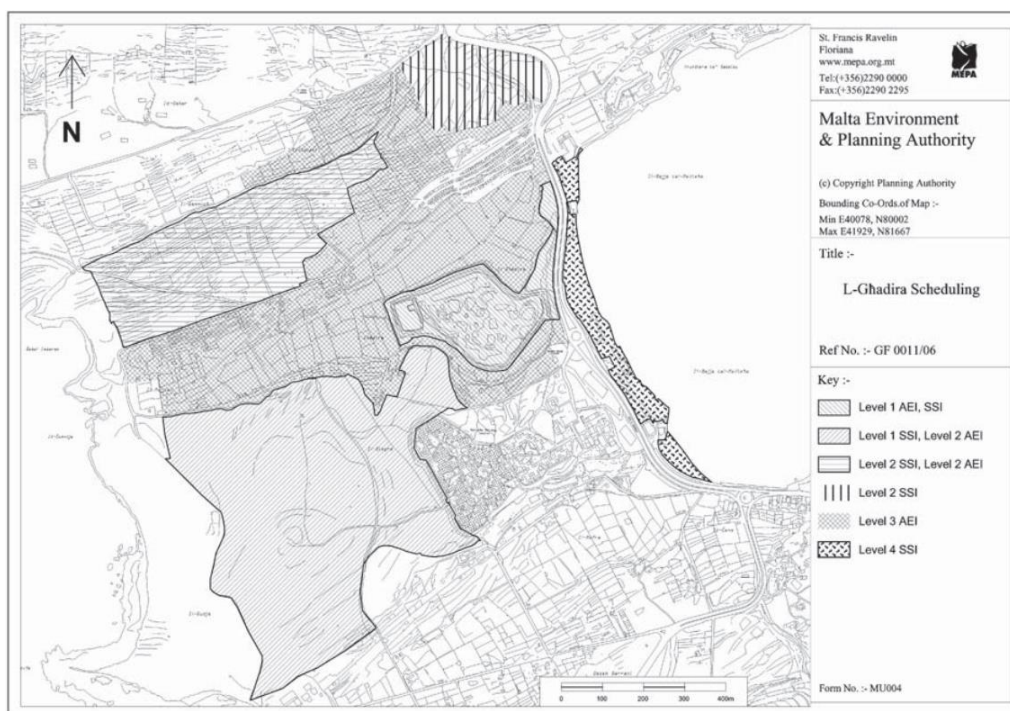


Figure 1: Scheduling of Festival Hotel area as per Government Notice 491 of 2006

¹ https://era.org.mt/wp-content/uploads/2019/10/GN_491_of_2006.pdf



The proposed area of development is also addressed by the **Management Plan for the Natura 2000 site**².

Management Objective 20 calls to ensure that the range and population size of breeding, wintering and staging wetland and woodland birds are increased. At the same time, the plan highlights that the main factors negatively impacting the woodland species (including raptors) are “limited size of roosting habitat, poaching and disturbance on roosting grounds”. The development is located within a Bird Sanctuary, a limited designation considering the vast areas of land in the country that do not gain from such protection, and such a management objective would be only satisfied if the hotel is demolished and not replaced with another one.

With respect to touristic developments, Management Objective 26 commands that tourism and outdoor recreation activities should complement the site’s conservation needs by ensuring that tourist development and infrastructure is compatible with and does not negatively impact the site’s ecological integrity. Such a development would therefore impinge on such a management objective.

Planning policies context

The re-development of the Festival hotel runs counter to various positions in relevant policy documents for the area, namely Malta’s SPED and the North West Local Plan including the Marfa Action Plan policies.

Malta’s Strategic Plan for the Environment and Development (SPED) of 2015 recognises the area of the proposed development as an **Area of High Landscape Protection** under the Rural Area Policies, and as a **Predominantly Rural Coast** under the Coastal Zone and Rural Area Policies.

If given the green light, the development **would counter various SPED objectives** such as:

- Thematic Objective 5 which calls to ensure the protection, enhancement and accessibility of existing recreational resources, improving their social cohesion, human health, air quality and biodiversity by: “safeguarding... Mellieha Foresta 2000... from deleterious and incompatible land uses”;
- Thematic Objective 7 promoting the efficient use of resources including soil and minimisation of impacts on landscape by:
 - ◆ “Controlling the location of development to prevent soil sealing and erosion” (as has happened in case of Festival Hotel in the past);
 - ◆ “Controlling demolition of buildings and structures and excavation of sites”
- Thematic Objective 8 calling to safeguard and enhance biodiversity, geology and geomorphology by:
 - ◆ identifying, designating and managing areas, sites, spaces for protection and appreciation;
 - ◆ Safeguarding protected areas including SACs and SPAs whilst enabling activities aimed at enhancing their management objectives (in regard to this, please refer to the section below);
 - ◆ Controlling sources of light pollution.
- Rural Objective 1 which highlights the need to control the cumulative effect of rural development. This is especially relevant taking into consideration the proposal for redevelopment of the Mellieha Bay Hotel in close distance to the site (PA/09876/19 and PA/01948/20).

² https://era.org.mt/wp-content/uploads/2019/05/L-Inhawi_tal-Ghadira_ManagementPlan.pdf



- Rural Objective 2 calling to ensure that existing rural recreational resources are protected, enhanced and accessible, and facilitate the provision of new recreational facilities which however would not have an adverse impact on protected areas, species and areas of high landscape sensitivity by:
 - ◆ Identifying and managing key rural areas popular for informal recreation, improving synergies between biodiversity and tourism, and protecting them from deleterious and incompatible uses;
 - ◆ Ensuring compatibility between these activities and other land uses.

- Rural Objective 3 which calls to “guide development which is either justified to be located in the Rural Area in approved Government policies, plans or programmes, or is incompatible with urban uses or where alternatives are not possible, to the Rural Area away from protected Areas and Areas of High Landscape Sensitivity...”

- Rural Objective 4 stating the importance to protect and enhance the positive qualities of the landscape and the traditional components of the rural landscape by:
 - ◆ Promoting integrated countryside management;
 - ◆ Carrying out a reappraisal of designated areas.

- Coastal Objective 1 calling to prioritise uses that necessitate a location on the coastal zone in a manner which minimises user conflicts, protects biodiversity, landscapes, public access and use by:
 - ◆ Designating a predominantly terrestrial rural coast to encourage the continuation of traditional agricultural use where predominant, and public access for informal recreation. The rural coast may also accommodate legitimate coastal uses of strategic importance which may be incompatible with urban coastal uses and where no alternative locations on the designated urban coast exist.

The proposed development within l-Inhawi tal-Ghadira also falls under the North West Local Plan which promotes a strategy for conservation for the area which seeks to:

- ❖ identify, protect and maintain areas of afforestation;
- ❖ encourage “environmental management” in order to resolve conflicts of interest in the countryside.

Furthermore, the local plan establishes the requirements for the development of new tourist accommodations (including extensions to existing tourist accommodation, change of use into tourist accommodation and new tourist accommodation), stating that “the thrust of the strategy for new tourism accommodation in the North West Local Plan is to allow the controlled expansion of the number of beds but in specific parts of specific urban areas only. The area of the Festival hotel does not form part of the selected urban areas.

The local plan policy NWT0 2 regulating the rehabilitation of Redevelopment of Existing Tourist Accommodation in Rural Areas states that: “The total re-development of existing tourist accommodation facilities in rural areas, including coastal areas outside the development zone, will only be considered in very exceptional cases where the new proposal is for a hotel and has a very high design quality and considerably improves the rural or coastal landscape. Even in such rare cases, the increase in the number of beds and/or the intensification of the existing uses will not normally be favourably considered”.

In line with Marfa Action Plan policies, “The Malta Environment and Planning Authority will not permit the development of any structure or activity which, in the view of the Authority, would adversely affect Areas of High



Landscape Value.” Given the location of the development site, one may hardly imagine any scenario where the landscape value would be improved with a redeveloped hotel.

BirdLife Malta’s objection

- The proposed development occurs within and in close proximity of the Foresta 2000 site, a long-term project commenced in 2003, between BirdLife Malta along with Din l-Art Helwa and PARKS, with the aim of establishing a Mediterranean forest that would become a wildlife refuge. **At face value the redevelopment of the area into a hotel contrasts with the site’s vision and purpose.**
- The site is an ecologically important one and given its designations and protected status within a designated Natura 2000 site, **the redevelopment of the site shall have a permanent lasting impact on the area’s ecological value.**
- Mellieha has a number of hotels that have been redeveloped and expanded in recent years, in particular within the Mellieha Bay area (e.g. expansion of Seabank Hotel; expansion of Mellieha Holiday Centre; redevelopment of Mellieha Bay Hotel). Malta’s projections for tourism are already foreseeing a surplus of hotel beds which the country may not be able to fill to keep hotels running at economically sustainable levels³. **Really and truly, adding hotel beds in this area is unnecessary and possibly even economically not viable.**
- The Foresta 2000 site offers a refuge to wildlife but also has a high recreational value to residents and visitors to Mellieha, also as a direct consequence of the site in question having been left abandoned and unoccupied for so many years. We firmly believe that should the site be re-developed into a hotel, **the area shall lose its remoteness, peace and tranquillity and therefore its recreational value.**
- Additionally, the site is an educational outdoor classroom for hundreds of students who visit the area on a yearly basis on guided field visits, carefully managed to mitigate human disturbance to the forest. The ecology and biodiversity of Foresta 2000 and the relatively low human impact on the site are key features that make the area a valuable context for nature-based student learning. Furthermore, Foresta 2000 provides an increasingly rare opportunity for students in our islands to carry out MATSEC biology projects in a high-value ecological context. For the same reasons explained above, **we believe the educational value shall be directly impacted as a result of the area being redeveloped into a hotel.**
- As presented in this document, **the re-development of the hotel would run counter to various planning policies for the area**, which since 2006 have pointed to the area as being ear-marked for nature protection rather than its previous context of a failed hotel construction. In consideration of the above, we simply see no reason why such policies should be over-ridden or ignored.

In the context of the above-mentioned, **BirdLife Malta objects to the proposed re-development of the area into a hotel which is incompatible with the Natura 2000 site and the ecological, educational and amenity value this offers.**

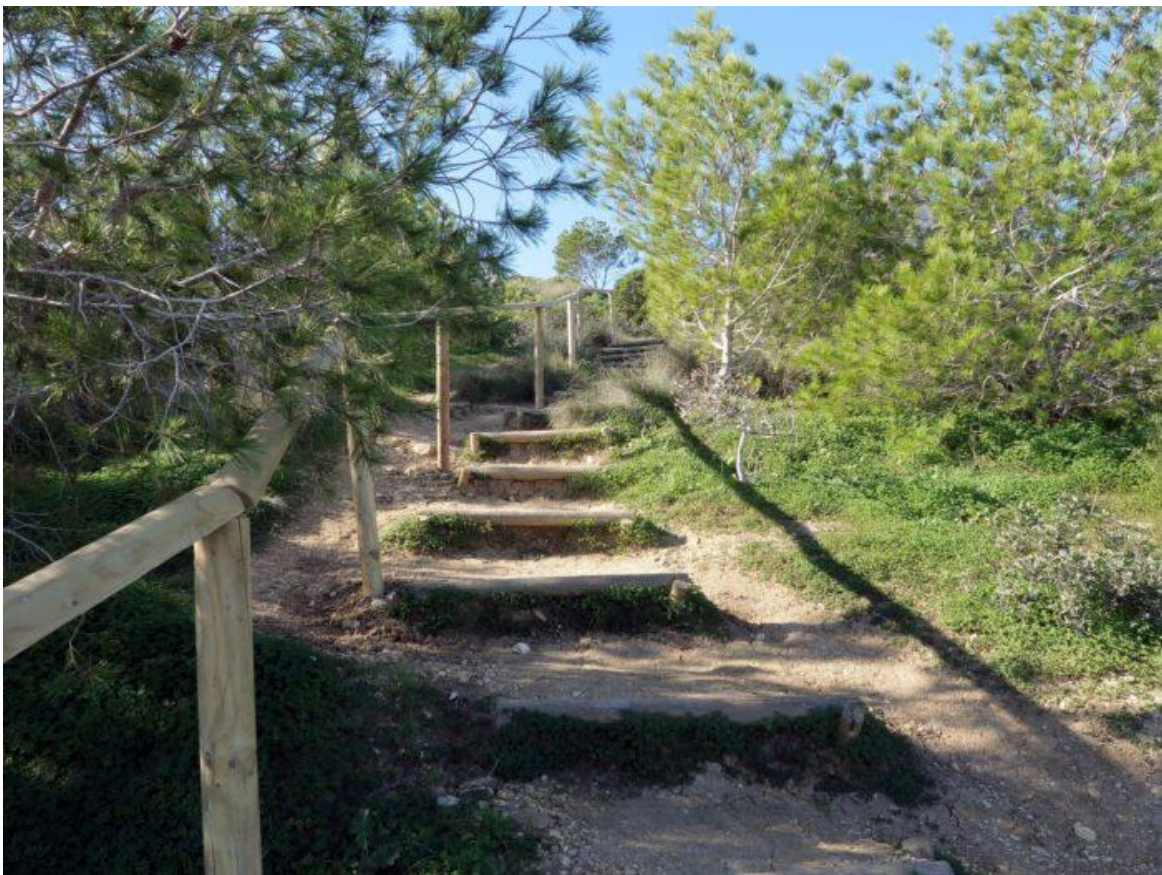
Moreover, BirdLife Malta invites the owners of the area or of the proposed development to consider removing the dilapidated structures of the ex-Festival hotel, by submitting the respective method statements to ERA and to ensure that such structures are removed carefully and sensibly to not cause any loss of ecologically important assets that may have colonised the area, and in such a manner so that it does not cause disturbances by way of noise, vibrations, light or any physical disturbance to adjacent areas within the Natura 2000 site.

³ <https://www.independent.com.mt/articles/2022-09-29/local-news/WATCH-Malta-definitely-cannot-take-five-million-tourists-Tourism-Minister-says-6736246251>



BirdLife Malta appeals to the developers and architects to take the opportunity of re-utilising such a site to enhance its ecological and amenity value for nature protection, which contrasts heavily with the already developed areas of Mellieha Bay, and the large swathes of land donated for bird hunting purposes in Mellieha over the past years⁴. The site's unique status of a Mediterranean forest protected as a bird sanctuary where hunting and trapping cannot be practised, wherein students are educated about our wildlife, and where the public can enjoy a stroll in one of Malta's unperturbed yet limited open spaces, is something needy of protection and appreciation rather than development and speculation.

ENDS



⁴ <https://lovinmalta.com/news/maltas-government-signs-ahrax-and-mizieb-handover-to-hunters/>