



BirdLife Malta's objection to the PA 5500/22
Construction of a 4 star hotel including ancillary facilities and an
underground parking area. Hotel will be on 4 floors at basement level,
14 floors above lower street level
30th September 2022

BirdLife Malta has analysed the documents present on the PA's online portal regarding the proposed development of a 14-storey hotel in Xlendi including ancillary facilities and an underground parking area. Our feedback is as follows.

First of all, we would like to emphasise our position as regards to the common yet harmful practice of splitting a single development under several planning applications, as it is the case for the development of the hotel in question which was divided into 2 phases between the PA 04587/20 and the PA 5500/22. Such a practice does not allow one to see the full picture and scale of the project, nor to assess the whole range of environmental impacts associated with such development.

The project is located in the immediate vicinity to a number of massive developments which have been approved in recent years:

- PA 3818/20 which features 60 apartments and penthouses and is being appealed at the moment;
- PA 4620/22 associated with the PA 3818/20
- PA 6676/16 featuring a block of 39 apartments and three levels of basement garages.
- PA 04751/20 which is a 10-storey hotel regarding which ERA has expressed its concerns nevertheless the permission was granted by the PA.

The scheme is going to take as much as 867,27 m² and is about to encroach onto an important Natura 2000 site SAC *L-Inħawi tax-Xlendi u tal-Wied tal-Kantra*, Marine SPA *Żona fil-Baħar ta' madwar Għawdex MT0000112*, as well as an Area of Ecological Importance and a Site of Scientific Importance *Wied ix-Xlendi, Wied il-Lunzjata u l-inħawi tagħhom, fil-limiti ta' Kerċem, il-Munxar, Fontana u r-Rabat (Għawdex)*. Therefore, we can say with confidence that the construction of a 14-storey hotel also having underground levels is likely to have a great impact on the protected habitats. Furthermore, the cliffs in the area are known for hosting a colony of protected Scopoli's Shearwaters (Annex 1 species). From this perspective, we are particularly concerned about the impacts of light and noise pollution on the seabirds, especially taking into consideration the cumulative effect of other developments nearby and the urban area in general.



Especially alarming is the issue of height of the proposed development which is 14 floors above the street level. According to the Gozo and Comino Local Plan, the building height in the area in question should not exceed 4 floors. Additionally, the Local Plan also calls for the rehabilitation of despoiled areas of the coast, and puts emphasis on conservation through coastal management. From this point of view, the proposed hotel goes contrary to the local policies' priorities.

To sum up, the development is massive and located very close to Natura 2000 site which means it is likely to impinge on the protected area including the protected garrigue landscape. It also can become an additional source of light and noise pollution during both construction and operation phases which can create another pressure for protected shearwaters. The height of the hotel is absolutely unacceptable and contradicts the limitations set in the Local Plan. On the basis of all the above-mentioned BirdLife Malta objects to the PA 5500/22.