



BirdLife Malta's comments on the PA 06754/22

Extension at levels 5,6,and 7 of an existing Class 3A hotel. The construction of 3 additional floors for a total of 72 additional hotel rooms, and a roof garden with pool and ancillary facilities
02 December 2022

BirdLife Malta became aware of the proposed extension to the Pergola hotel in Mellieha, which shall see the hotel increase in height by adding 3 more floors and increasing the total capacity of the hotel by 72 additional rooms. Apart from that, the roof is proposed to accommodate a garden and a pool with some ancillary facilities.

First and foremost, this proposal goes contrary to the North West Local plan, particularly Policy NWUS 5 Building Height Limitations which stipulates that the area should be limited to 1 floor buildings. The existing hotel is located on the very top of the ridge and adding additional height will significantly impact the amenity and negatively influence the landscape of the area. The local plan also stresses on the issue of “the visual impact of proposed development” which can be detrimental due to the specific topography of the locality. Apart from that, due to adding the weight of 3 more storeys, the structure and stability of the slope can potentially be compromised, while the local policies call for safeguarding of the inner cliffs and the protected valley lying just about 35m beneath the site. Therefore, we urge the developer to reconsider the height significantly.

Another concern arising from such redevelopment, is the increase in light pollution which already is a serious issue in the area of Mellieha. The location of the hotel is such that it overlooks the North-East coast of Malta and shall have a visual impact perceived from a number of surrounding Natura 2000 sites. These particularly include Rdum tal-Madonna, L-Ghadira area and the protected island of Comino in the more immediate vicinity and further away as far as the cliffs of Ta' Cenc. These Natura 2000 sites host large colonies of seabirds (Yelkouan Shearwater, Scopoli's Shearwater which both are Annex 1 species under the Birds Directive) which are extremely sensitive to light pollution, especially during the fledgling season. Seabirds are nocturnal creatures and darkness is the crucial quality of their habitat; shearwaters can be directly impacted by light pollution through disorientation leading to light-induced groundings, which may have effects as severe as lethality. Mellieha is considered as one of the hotspots of shearwaters' light-induced strandings. Therefore, the external lighting scheme should be designed with special attention to this fact and in line with the Guidelines for Ecologically Responsible Lighting¹ and ERA's Guidelines for the Reduction of Light Pollution in the Maltese Islands. The rooftop lighting scheme is to be given a special focus with the idea to completely avoid light spill.

We recommend that for such a project, the Project Description Statement is to be drafted, containing all the technical information as to the proposed extension and the site itself, as well as the proposed timing of works, landscaping plan, materials to be used during the

¹<https://birdlifemalta.org/wp-content/uploads/2020/07/Guidelines-for-Ecologically-Responsible-Lighting.pdf>

construction and the waste management plan as well as the external lighting scheme including on the rooftop.

Such an increase in capacity as proposed by the developer will inevitably lead to the increased demand in transportation and parking. The traffic situation in Mellicha remains alarming and adding to it additional pressure can lead to a transport collapse. A traffic impact statement should be provided before any decision is taken in relation to this development.

A development of such nature can also add to existing noise levels in the locality. The assessment of noise and vibrations, especially during the construction phase, should be conducted, with consideration given to the top ridge location of the hotel, and therefore the geomorphological specifics of the area. Judging by the information provided by the PA's MapServer, the area is accommodating several more construction sites at the moment (Fig.1), therefore the cumulative effect in terms of light, noise and air pollution, as well as traffic, vibrations and impact to amenity is to be taken into consideration.

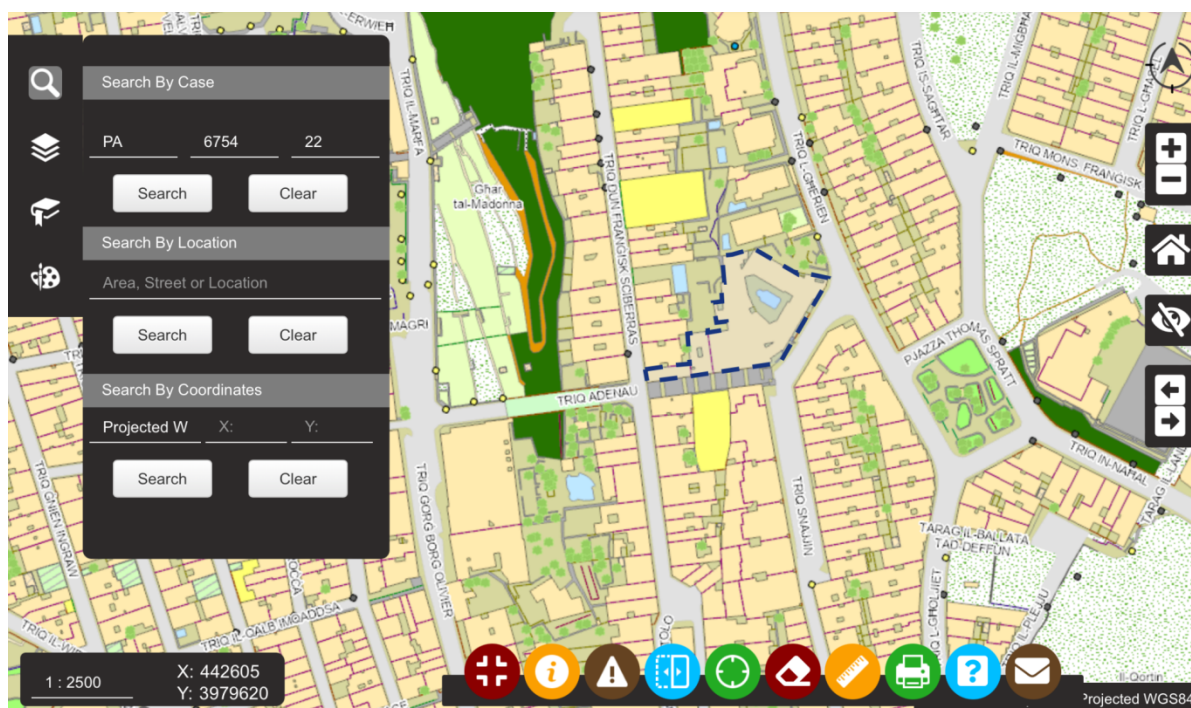


Figure 1. PA 06754/22 in blue dotted line and construction sites nearby in yellow. Source: PA MapServer

Given the pressures such a hotel extension may have on the neighbouring residential area and the environment, the development should be subject to screening procedure by ERA under the Environmental Impact Assessment Regulations.