



**BirdLife Malta feedback on the Partial Local Plan Review of the North Harbours
Local Plan - Villa Rosa Site - Phase 2**

10th June 2025

BirdLife Malta submits the following objection to the proposed Partial Local Plan Review of the North Harbours Local Plan (Villa Rosa Site – Phase 2). We are deeply concerned that the revised plan departs significantly from established planning policies, introduces unjustified development intensification, and threatens ecologically sensitive areas, protected sites, and the well-being of nearby communities.

Under the current Local Plan Policy NHPV13, development on the site is restricted to six or seven storeys. However, the revised policy clearly states that buildings of up to 39 storeys will rise above St George’s Bay, alongside two additional towers of 22 storeys. The development footprint would expand to approximately 146,500 square metres - a significant intensification that risks permanently altering the character of the area and placing strain on nearby communities, public infrastructure, natural heritage sites and the only remaining open green space in the area.

The review does not offer a credible justification for the increased height limits introduced under the revised Hotels Heights Policy. There is no indication of a tourism shortfall in Malta, nor any supporting data to suggest that high-rise hotels would attract “high-quality tourism.” It also remains unclear who proposed these changes, what public benefit they are intended to serve, or who will be responsible for the significant infrastructure costs they entail.

Furthermore, there are no publicly accessible studies assessing the potential impacts - environmental, social, economic, or visual - that this Local Plan Review will have on either the immediate site or the surrounding areas. This raises serious concerns about how Objectives 4 and 5 of the master plan can be met - objectives which claim that the comprehensive master plan will ensure environmentally sensitive areas are protected and that impacts on the valley and St George’s Bay will be kept within acceptable limits. It is illogical to permit developments of this scale while claiming they will not significantly impact the environment—especially without first assessing those impacts. Moreover, the master plan’s objectives fail to account for the cumulative effects of multiple large-scale projects in the area, including the ongoing construction of a massive hotel on the former Institute of Tourism Studies (ITS) site by DB Hotels.



While we acknowledge that the Revised North Harbours Local Plan and the Villa Rosa Urban Design Concept (Map PV4) propose expanded public open spaces and the protection of ecologically sensitive land currently allocated for development, the proposed increase in building heights - up to 39 storeys – will inevitably have negative ecological consequences for the valley. It is almost impossible that developments of such scale will not have serious environmental consequences. This contradicts one of the key objectives of the master plan to protect the environmentally sensitive areas.

The Planning Authority's claim that the project will enhance public space is highly questionable, also when considering that the boundary of the development area A in the original map has been subtly extended, contrary to initial claims of no change. With regards to the new open areas, these would be overshadowed by the massive structures proposed. Moreover, the area is already struggling with traffic, overdevelopment, and overflowing drainage into the bay. Further intensification will only worsen conditions in Pembroke, St Julian's, and Swieqi.

Additionally, BirdLife Malta notes that any new developments within the areas marked on Map PV4 would conflict with the EU Nature Restoration Law (NRL), enacted in August 2024. According to Article 8, Malta is legally required to prevent any net loss in the total national area of urban green space and urban tree canopy cover in urban ecosystems compared to 2024 levels. Map PV4 includes one of the few remaining green spaces in an otherwise heavily urbanised area. This area holds the potential to be restored to its natural state, with increased canopy cover, therefore providing an open green space filled with shrubs and trees native to Malta's valleys for both residents and tourists to enjoy. The Planning Authority should bear the responsibility to refuse developments in such areas on the grounds that they violate the NRL.

The revised plan would also endanger several protected sites, including the Grade 1 scheduled Villa Rosa, the Ħarq Ħammiem Cave (which holds Level 1 protection), and nearby Areas of Ecological Importance.

In light of the above, BirdLife Malta strongly objects to this Local Plan Review. If approved, this proposal will permanently alter one of Malta's coastal landscapes, with serious consequences for the country's environmental and cultural heritage, and for residents' quality of life.