



BirdLife Malta objects to the planning application for the demolition of the existing hotel covered by permit PB/03038/87 and the reconstruction of the same hotel in line with that permit (PA/00154/25)

18th February 2026

1. Introduction

BirdLife Malta has reviewed the documents available online on the Planning Authority's website with respect to PA/00154/26 which is proposing the demolition of the ex-Festival hotel structure and its replacement with a 7-floor level hotel, with 4 levels below ground. In the current Planning Application process, it is unclear how each floor is intended to be used and which ancillary facilities are being proposed. This lack of detail makes it difficult to submit a representation that accurately reflects the full extent of the impacts such a development may entail. Nonetheless, it is anticipated that the project would include ancillary facilities such as a swimming pool, restaurants, additional recreational amenities, and parking spaces.

The development runs counter to various designations relating to the natural and amenity value of the area, as well as to a number of policies and plans that have been established for the area over the years. Below, we outline the environmental and planning policy context of the area, which provides the basis for our objection to this proposed development.

2. Environmental context

The development is proposed within **Natura 2000 site - L-Inħawi tal-Għadira** MT0000015 – both a Special Area of Conservation and a Special Protection Area. This designation is due to its important flora, fauna and habitats. The site also has other levels of protection including as an Area of Ecological Importance, a Site of Scientific Importance (*L-Inħawi ta' l-Għadira mill-Bajja tal-Mellieħa saċ-Ċumnija fil-Mellieħa*), and a Bird Sanctuary.

Despite these designations which cover the wide area of 'L-Inħawi tal-Għadira', the specific location of the proposed development at the ex-hotel site had been scheduled as a **Level 1 Site of Scientific Importance** 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

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

ecological importance of the area, including the existing abandoned structure (See Figure 1).

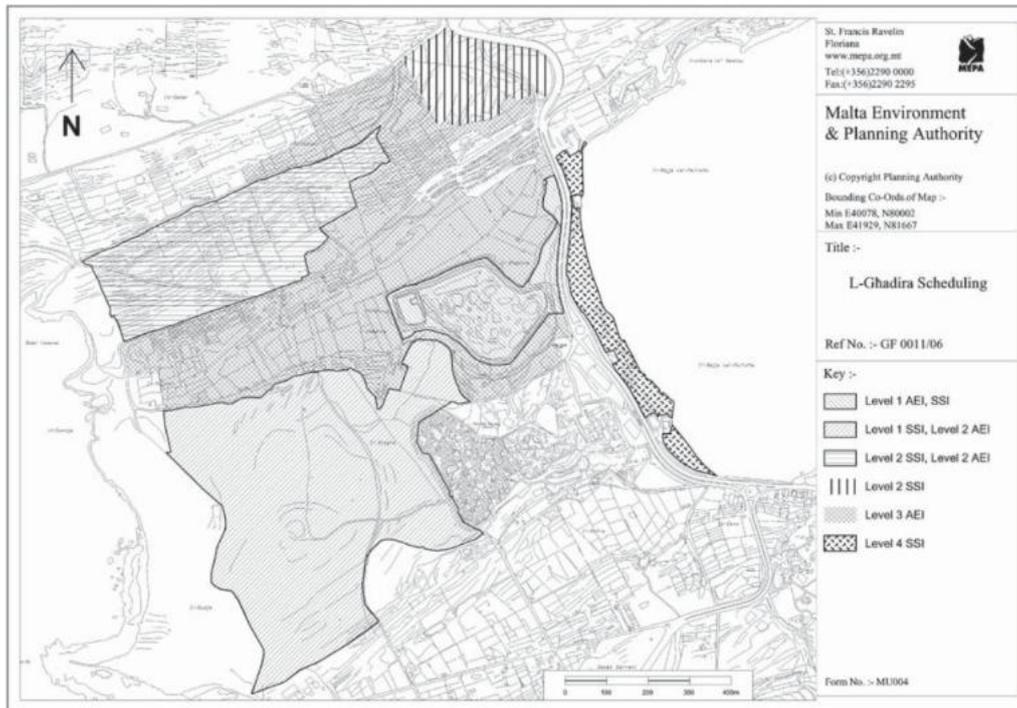


Figure 1: Scheduling of Festival Hotel area as per Government Notice 491 of 2006

The proposed area of development is also addressed by the **Natura 2000 Management Plan of L-Inħawi tal-Ghadira**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”.

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.

In view of these management objectives and also in line with Measure M2 stipulated in the management plan, the Planning Authority should be “prohibiting development,

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



which adversely affects statutory protected areas and the ecological integrity of protected areas”.

Notwithstanding the above, the recently enacted **EU Nature Restoration Law** introduces binding obligations on Member States to restore degraded ecosystems and enhance biodiversity across terrestrial and coastal areas, with a particular focus on Natura 2000 sites. This legal framework marks a shift from protecting designated sites to actively restoring habitats that have been damaged or degraded over time.

Despite its previous development, the area lies within the Natura 2000 site L-Inħawi tal-Ghadira and rather than reintroducing intensive built infrastructure and commercialisation of the area, the site presents a clear opportunity for ecological rehabilitation. Thereby, this area merits to be included within Malta’s upcoming National Nature Restoration Plan.

3. Planning policies context

The development of the Festival hotel contradicts several policy documents relevant to the area, namely Malta’s Strategic Plan for the Environment and Development (SPED) and the North West Local Plan including the Marfa Action Plan policies.

Malta’s 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 objective** including:

- 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).
- 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-Inħawi tal-Għadira 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 NWTO 2 regulating the rehabilitation of Redevelopment of Existing Tourist Accommodation in Rural Areas states that: “The total 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 the development of a hotel.

4. Objection to the proposed planning application

BirdLife Malta formally objects to and firmly opposes this planning application on the following grounds:

- 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.**
- Mellieħa has seen several hotels redeveloped and expanded in recent years, particularly within the Mellieħa Bay area, including the expansion of the Seabank Hotel, the enlargement of the Mellieħa Holiday Centre, and the redevelopment of the former Mellieħa Bay Hotel. At the same time, national tourism projections already indicate a potential surplus of hotel beds, raising concerns about the country's ability to maintain occupancy rates at economically sustainable levels³. In this context, the addition of further hotel accommodation in this area appears unnecessary and may ultimately prove economically unviable.
- The Foresta 2000 site offers a refuge to wildlife but also has a high recreational value to residents and visitors to Mellieħa. If the site is 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. For the same reasons explained above, we believe the educational

³ https://content.maltatoday.com.mt/ui/files/tourism_capacity_study_report.pdf



value shall be directly impacted as a result of the area being developed into a hotel.

- As presented in this document, **the 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.

5. Concluding remarks

In the context of the above-mentioned, **BirdLife Malta objects to the proposed 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-Festaval 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.

BirdLife Malta appeals to the developers and architects to take the opportunity of restoring such a site to enhance its ecological and amenity value for nature protection and in line with the Nature Restoration Law. The site's unique status as a Mediterranean forest - where hunting and trapping are prohibited, where students are educated about local wildlife, and where the public can enjoy one of Malta's limited open spaces - merits the highest levels of protection and appreciation rather than further development and speculation.