

The Executive Chairperson  
Planning Authority  
St. Francis Ravelin,  
Floriana

Date: 26 May 2025  
ERA Ref: EA/00004/20

Dear Sir, Madam,

PA Ref.: PA/09876/19 & PA/01948/20  
Description: Proposal of demolition of existing hotel; & Proposed development of hotel (Class 3B)  
Proposal: with ancillary facilities including storage of LPG tanks and excavation works, following the demolition of the existing hotel (PA/9876/19). Proposal also includes soft/hard landscaping, pools, restoration/construction of rubble walls, and restoration of part of the coast. Total proposed number of guest rooms is 421 rooms.  
Location: Site at, Mellieħa Bay Hotel, Triq il-Marfa, Ġhadira, Mellieħa.

### **1. Introduction**

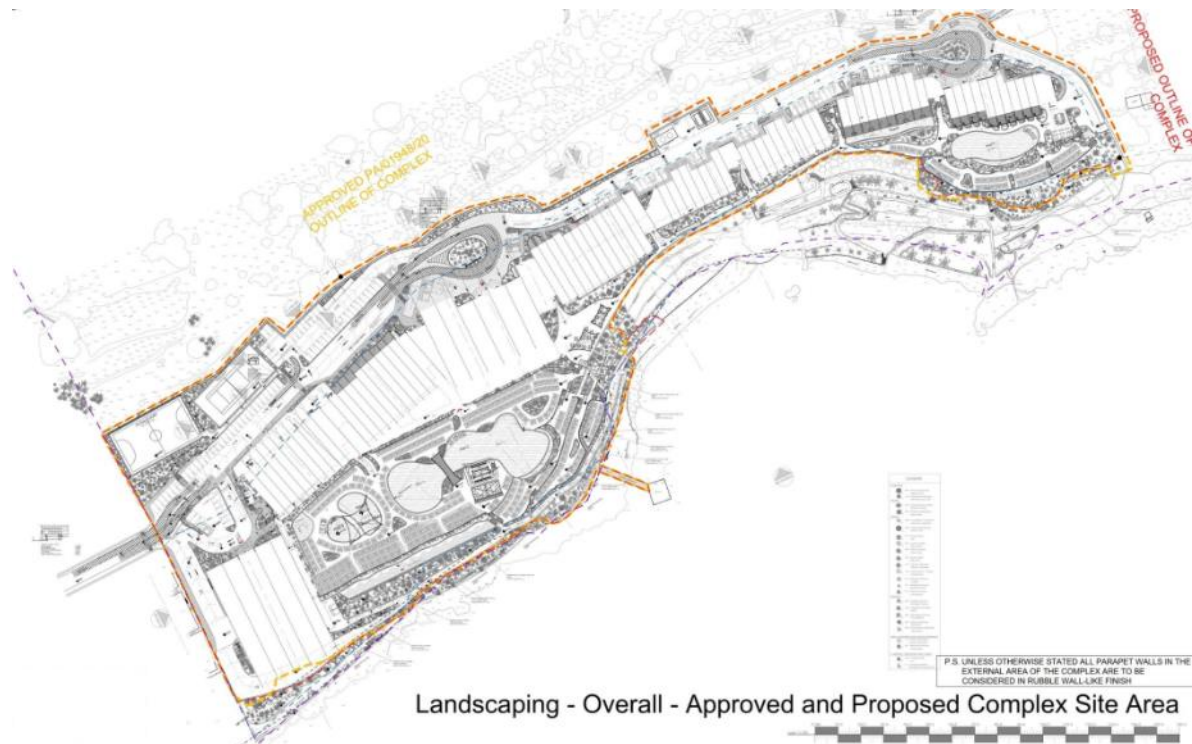
Reference is made to the project in caption, involving the redevelopment of the Mellieħa Bay Hotel complex, which had been subject to an environmental assessment (refer to <https://era.org.mt/era-project/pa9876-19/>) during 2020-2022, and for which development permission was granted in June 2023 (PA/09876/19) and October 2023 (PA/01948/20).

Following proposed revisions to plans, ERA requested a statement from the EIA/AA Coordinator to discuss such changes in more detail and their potential implications on the findings of the 2022 EIA and AA Reports. This statement was referred directly to ERA on 07 April 2025 (available from the afore-mentioned link) and discusses the below-listed changes, as also shown in figures 1-2 and in the comparative photomontages in figure 3:

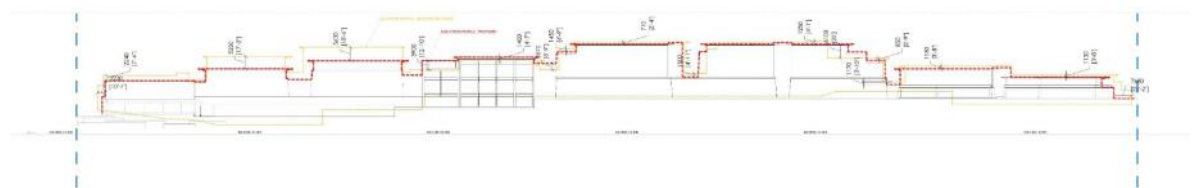
- Changes to the massing and architectural design of the buildings;
- Reduction in built-up area (-85 m<sup>2</sup>, resulting in 36,460 m<sup>2</sup>), building footprint (-3,106 m<sup>2</sup>, resulting in 12,100 m<sup>2</sup>), and gross floor area (-7,503 m<sup>2</sup>, resulting in 43,477 m<sup>2</sup>). Note: no changes proposed to the northern boundary, facing the rural area);
- Reduction in heights of all building blocks (ranging from 1.13 m to 5.63 m in height reduction), except for one building block for which an increase of 1.4 m is proposed. The maximum height is reduced by 0.7m to 38.05m.

Table 1: Overview of proposed changes, as compared to development parameters previously approved (Source: ERA's 2022 Assessment and Recommendations report and 2025 Coordinator's Statement, <https://era.org.mt/era-project/pa9876-19/>)

<b><u>Hotel complex</u></b>	<b><u>As approved</u></b>	<b><u>Proposed changes (2025)</u></b>
<b>Guestroom complement</b>	359	359
<b>Parking complement</b>	152 car spaces, 2 van spaces, 7 coach spaces	154 car spaces, 1 van space, 4 coach spaces
<b>Complex Site Area</b>	42,145 m <sup>2</sup>	42,240 m <sup>2</sup>
<b>Area outside of 'Area for Restrained Redevelopment'</b>	12,389 m <sup>2</sup>	12,389 m <sup>2</sup>
<b>Building footprint</b>	15,206 m <sup>2</sup>	12,100 m <sup>2</sup>
<b>Gross Floor Area (GFA)</b>	50,980 m <sup>2</sup>	43,477 m <sup>2</sup>



**Figure 1** – Complex site area - approved (yellow) and proposed (red) (Source: EIA Coordinator's Statement, 2025)





**Figure 3** – Photomontages – previous hotel (upper), approved (middle) and proposed (upper)  
(Source: 2022 EIA Report and 2025 Coordinator’s Statement).



## **2. EIA Coordinator Statement's findings**

The EIA Coordinator statement confirmed that the changes to the approved development are unlikely to affect the significance of the impacts assessed in the previous EIA in terms of geo-environment, agriculture, terrestrial ecology, avifauna, marine environment, cultural heritage, noise emissions, and landscape character. With respect to *visual amenity*, as it was unclear how the proposed changes to the massing and height of the development would affect the visual amenity from surrounding viewpoints, photomontages (as initially prepared for the 2022 EIA Report) and the evaluation of visual impacts were updated.

Apart from one viewpoint (Triq il-Marfa), the significance of the project's visual impact (as seen from the various long- medium- and short-distance viewpoints assessed) would remain similar as for the approved development. With respect to the view from the Northern approach road (Triq il-Marfa), the proposed lowering of the development reduces the developments' intrusion into the bay's landscape and therefore also its significance in terms of visual impact.

In this regard, the EIA Coordinator Statement concluded that none of the environmental impacts assessed in the previous EIA are expected to increase in significance with the revised plans in place. ERA agrees with the Coordinator's assessment above and considers that no further updating of EIA studies is required.

## **3. AA Coordinator Statement's findings**

The AA Coordinator statement confirmed that the afore-mentioned changes to the approved development are unlikely to affect the significance of the impacts assessed in the previous AA in relation to avifauna and marine ecology, and that with the revised plans in place the project is still not expected to affect the integrity of the nearby protected sites, namely:

- L-Inħawi tal-Għadira (MT0000015) - Special Area of Conservation (SAC) and Special Protected Area (SPA);
- L-Inħawi tar-Ramla tat-Torri u tal-Irdum tal-Madonna (MT0000009) – SPA;
- Żona fil-Baħar bejn il-Ponta ta' San Dimitri (Għawdex) u Il-Qaliet (MT0000105) - SAC; and
- Żona fil-Baħar ta' Madwar Għawdex (MT0000112) – SPA.

ERA agrees with the Coordinator's assessment and considers that no updating of the AA is required. The previous AA conclusions remain applicable.

## **4. Conclusion and way-forward**

ERA notes the commitment for the redevelopment of the Mellieha Bay Hotel established through the approved permits PA/09876/19 and PA/01948/20, and that no new/additional environmental concerns have been identified through the current evaluation. The proposed changes to the approved plans are considered positive from an environmental point of view, notably in terms of visual impact.

To this effect, ERA does not object to the revised proposal. The following requirements (as per previous 2022 assessment) are still relevant and are to be addressed:

- The foreground (rocky shore) of the hotel should be returned to its original state, in line with a restoration method statement;
- Landscaping should respect the site context and the surrounding landscape, and be implemented in line with an approved landscaping plan; and

- Lighting on site should not contribute to light pollution in the area and be installed in line with an approved lighting plan.

The updated environmental conditions included as Annex I to this correspondence are to be duly reflected in the development permit.

Yours faithfully,

Yves De Blick  
Senior Officer Environmental Assessment  
f/Director Regulatory Affairs

***Disclaimer***

*The above assessment results, the ensuing conclusions and recommendations are without prejudice to any required changes or updates should the development proposal be eventually modified again or should the information/assumptions provided turn out to be incorrect. Any deviations of the proposal from this submission would need to be re-assessed and the merits of this assessment would need to be reopened.*