



PA/05888/25

EXTENSION TO PARADISE BAY RESORT, IL-MARFA, IL-MELLIEHA

PROJECT DESCRIPTION STATEMENT



Version 1: June 2026



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Quality Assurance

Extension to Paradise Bay Resort, Il-Marfa, Il-Mellieħa Project Description Statement June 2026

Report for: **Paradise Bay Resort Ltd**

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CONTENTS

Introduction	1
Background.....	1
Alternatives	3
Location of the Scheme	3
Characteristics of the Scheme Site	3
Description of the General Surroundings	4
Land use	4
Geology and Hydrology	4
Environmental and Cultural Heritage Designations	5
The Scheme	13
Lighting	14
Landscaping	15
Resources	38
Raw Materials	39
Scheme Construction	39
Waste Management	43
Construction Phase	43
Potential Environmental Impacts	45
Mitigation Proposals	46

FIGURES

Figure 1: Location of site	6
Figure 2: Land uses	7
Figure 3: Images of the Surrounding Land Uses	8
Figure 4: Geology Map	9
Figure 5: Hydrology map	10
Figure 6: Environmental designations	11
Figure 7: Cultural heritage designations	12
Figure 8: Proposed Block Plan	16
Figure 9: Superimposed Plan	17
Figure 10: Comparative areas and footprint	18
Figure 11: Proposed Plan Level -2	19
Figure 12: Proposed Plan Level -1	20
Figure 13: Proposed Plan Level 0	21
Figure 14: Proposed Plan Level 1	22
Figure 15: Proposed Plan Level 2	23

Figure 16: Proposed Plan Level 3	24
Figure 17: Proposed Plan Level 4	25
Figure 18: Proposed Plan Level 5	26
Figure 19: Proposed Roof Plan	27
Figure 20: Section A-A	28
Figure 21: Section B-B	29
Figure 22: Section C-C	30
Figure 23: Proposed Streetscape Elevation	31
Figure 24: Existing, Superimposed & Proposed North Elevations A	32
Figure 25: Existing, Superimposed & Proposed North Elevations B	33
Figure 26: Existing, Superimposed & Proposed South Elevations A	34
Figure 27: Existing, Superimposed & Proposed South Elevations B	35
Figure 28: Visual of the Proposed Scheme from Triq il-Marfa	36
Figure 29: Visual of the Proposed Scheme from Paradise Bay	37
Figure 30: Tower Crane Positioning	41
Figure 31: Phasing Plan	42

TABLES

Table 1: Gross Floor Area	13
Table 2: Breakdown of Proposed Units	14
Table 3: Estimated Raw Materials for Construction	39
Table 4: Envisaged Employment during Construction	40
Table 5: Estimates of Construction Waste	43
Table 6: Estimated Current and Proposed Waste Generation	44

APPENDIX

Appendix I: Species List and Planting Proposals

PROJECT DESCRIPTION STATEMENT

INTRODUCTION

1. This Project Description Statement (PDS) describes a proposal to further extend the current Paradise Bay Resort, located at Marfa, Il-Mellieħa. The proposal is being taken forward in a Full Development Permit application (PA/05888/25). The Project Description Statement (PDS) has been requested by the Environment and Resources Authority (ERA).
2. The applicant is Mr Stefan Fenech on behalf of Paradise Bay Hotel Ltd, hereafter referred to as the 'Applicant'; the site is hereinafter referred to as 'the Scheme site' and the proposal is hereinafter referred to as 'the Scheme'. **Figure 1** shows the location of the Scheme site.
3. The Applicant has also been asked to prepare a Visual Impact Assessment (VIA), a Traffic Scoping Study (TSS), and a Waste Management Plan (WMP). Adi Associates has been commissioned and is currently preparing these studies.

BACKGROUND

4. The Paradise Bay Resort was constructed in the 1960s and originally comprised approximately 40 rooms. In the 1970s, the hotel was expanded to 180 rooms.
5. The latest extension was approved in 2009 and consisted of the addition of 36 rooms and the creation of an additional fourth floor (PA/01166/08).
6. A planning application (PA/01179/12) was approved in 2012 for the erection of a kitchen within an approved terrace.
7. An outline development permit application (PA/06418/18) for the extension of two floors to the existing Class 3B hotel, providing 120 additional rooms and other minor alterations, was withdrawn in 2020 by the applicant.
8. A screening request (PA/02096/19) for an extension of two floors to the existing Class 3B hotel, with 120 additional rooms and other minor alterations, was withdrawn in 2019.
9. A planning application (PA/02054/19) was approved in 2020 for the redesign of the hotel entrance, including altered internal vehicular carriageways, landscaped areas, and canopies.
10. The site is also covered by numerous sanctioning applications, including PA/00350/20 to sanction the existing pool; PA/01690/20, which involved the sanctioning of minor variations from PA/2269/16 and the addition of screens; and PA/02830/16 to sanction terraces as per the updated survey, a bedroom as built, and the erection of lightweight structures on the same terraces.

11. Planning application PA/05888/25 was submitted in June 2025 for “*Structural modifications and partial demolition, swimming pool re-erection and addition of two floors to the existing West Wing of the Paradise Bay Hotel, including demolition of the existing East Wing, excavation, and the construction of a new underground parking area, reservoirs, indoor and outdoor swimming pools, back-of-house facilities, hotel ancillary amenities, extensive soft landscaping, a water park, restaurants, a multipurpose hall, an auditorium, and guest suites — all designed to complement and serve the existing Class 3B hotel use.*” .

12. In October 2025, during the planning application consultation process, ERA noted the following:

“Noting the sensitive area within which the site is situated, ERA has concerns about the proposal, mainly due to the considerable intensification in massing proposed and the excavations in close proximity to the cliff (also in an area known for important geological deposits). Other secondary concerns include the likely increase in light emissions and the expansion of dominant development closer toward the natural and protected area to the east.

In view of the above, the proposal cannot currently be supported from an environmental point of view and is to be downscaled to address the concerns raised.

From a procedural perspective, the current proposal qualifies for an Environmental Impact Assessment (Category I project, as per Schedule I of the EIA Regulations) and an Appropriate Assessment in view of its location within the area of influence of both terrestrial and marine protected areas. However, noting the issues already evident at this stage, such are to be addressed upfront, prior to the undertaking of any further assessment”.

13. During consultation with the Superintendence of Cultural Heritage (SCH) the following was noted:

“As previously noted, the original hotel building was designed by Richard England and features modernist architectural elements. While acknowledging that the original structure has undergone various modifications and extensions over time, the Superintendence requires a clear and substantiated justification for its proposed demolition, rather than its preservation and integration into the new development”.

“Notwithstanding the above, the Superintendence highlights the cultural heritage significance of the surrounding landscape, which reflects a longstanding interaction between land and sea. This coastal setting shapes historical views and perceptions from both Malta and Gozo, particularly along the Il-Fliegu crossing. In this context, the Superintendence expresses concern regarding the potential visual

impact of the proposed development on the integrity of the coastal landscape, including views from key vantage points on Comino”.

14. To assess the potential visual impacts, SCH requested the submission of existing views and photomontages illustrating the proposed development from key vantage points. As mentioned, Adi Associates is currently preparing the Visual Impact Assessment.
15. Following consultation, the Scheme was revised and downscaled and the plans were subsequently revised and re-submitted on e-Apps in March, May and June 2026, respectively.
16. The planning application was re-submitted in June 2026 for “*Proposed structural modifications and partial demolition, swimming pool re-erection and addition of two floors to the existing West Wing of the Paradise Bay Hotel, including demolition of the existing East Wing , excavation, and the construction of a new underground parking area, reservoirs, indoor and outdoor swimming pools, back-of-house facilities, LPG Tank, Solar and PV panels, relocation of the existing substation and an additional new substation, hotel ancillary amenities, extensive soft landscaping, restaurants, a multipurpose hall, an auditorium, and guest suites — all designed to complement and serve the existing Class 3B hotel use”.*

ALTERNATIVES

17. As the Scheme involves the redevelopment and extension of an existing hotel, the consideration of alternative locations was not considered by the Applicant. The assessment of alternatives therefore focused on design revisions within the site.
18. The architects advise that the Scheme was revised to reduce overall scale, and the design was adjusted to consolidate built volumes within a more compact form. The initial proposal had a Gross Floor Area (GFA) of 70,220 m² which was reduced to 67,598 m², resulting in a decrease in the number of guest rooms from 539 to 506.

LOCATION OF THE SCHEME

19. The Scheme is located in Marfa within the locality of Il-Mellieħa, see **Figure I**. The site overlooks Il-Fliegu ta’ Malta, the channel that separates Malta from Comino, and Ir-Ramla taċ-Ċirkewwa (Paradise Bay).

CHARACTERISTICS OF THE SCHEME SITE

20. The Paradise Bay Resort is a four-star hotel with 275 rooms. Each room has its own facilities (including en-suite bathroom) and benefits from partial or full sea views.
21. The hotel features three restaurants and one bar, a private Blue Flag beach, a PADI-certified diving school centre, four seawater swimming pools, indoor swimming pool, sports facilities, a sauna and whirlpool, shops, a games room, conference and wedding facilities.
22. The hotel is located at the end of Triq Il-Marfa, an arterial TEN-T road, and just

before the Ċirkewwa Ferry Terminal.

23. The hotel has its own formal car park that is located to the east of the site.

DESCRIPTION OF THE GENERAL SURROUNDINGS

Land use

24. The Paradise Bay Resort is located in a rural area along the northern coast of Malta. It is situated adjacent to Iċ-Ċirkewwa sandy beach, to the north, and Ir-Ramla ta' Ċirkewwa (Paradise Bay) to the south.
25. The area is dominated by a garrigue environment and a rocky shoreline.
26. To the northwest of the Scheme is the Ċirkewwa Ferry Terminal. This terminal connects Malta to Gozo. The terminal includes a police station. There are also a kiosk and a jetty for boat trips from Ċirkewwa to Comino. The Ċirkewwa area is also popular with divers.
27. To the east of the site there is the Ċirkewwa Reverse Osmosis Plant. This plant is located close to Wied Musa.
28. The surrounding land uses are illustrated in **Figure 2** and **Figure 3**.

Geology and Hydrology

29. **Figure 4** illustrates the geological features of the Scheme site and its surroundings. The Scheme site is predominantly underlain by Quaternary Raised Marine Beach Deposits. The surrounding area is dominated by Upper Coralline Limestone, represented by the Tal-Mas, Tal-Pitkal, and Ġebel Imbark members.
30. The quaternary raised beach deposits are of considerable scientific importance as markers of past sea-level highstands during interglacial periods. They also provide evidence for quaternary climatic and environmental change and allow reconstruction of the coastal landscape evolution. They are also important sources of palaeontological material and act as key stratigraphic indicators within Maltese geology¹.
31. The wider area is structurally influenced by several normal faults, predominantly trending NE–SW, which locally offset the limestone sequence. The Blue Clay Formation is present further inland and at lower elevations, particularly towards the southern part of the mapped area, where it underlies the limestone and contributes to slope development along the coastal margins.

¹ Hunt, C.O., 1997. Quaternary deposits in the Maltese Islands: a microcosm of environmental change in Mediterranean lands. *GeoJournal* Vol. 41, No. 2, Malta: At the Crossroads of the Mediterranean (February 1997), pp 101-109.

32. **Figure 5** illustrates the hydrological setting of the Scheme site and its surroundings. The site lies entirely within the Marfa Coastal groundwater body; a coastal aquifer system hydraulically connected to the sea.

Environmental and Cultural Heritage Designations

33. **Figure 6** shows the environmental heritage designations bordering or in the vicinity of the Scheme Site. The environmental designations include:
- Area of Ecological Importance (AEI) - Rđum Majjiesa to lċ-Ċirkewwa [Coastal / Cliffs] (GN 400 of 1996);
 - Area of Ecological Importance (AEI) - Il-Prajjet to lċ-Ċirkewwa [Buffer Zone] (GN 400 of 1996);
 - Area of High Landscape Value – Coastal / Cliffs (GN 400 of 1996);
 - Site of Scientific Importance (SSI) – Part of Watercourse at Wied Musa (GN 661 of 1994)
 - Special Area of Conservation (SAC) – International Importance / Natura 2000 - Rđumijiet ta' Malta: Ir-Ramla taċ-Ċirkewwa sa Il-Ponta ta' Bengħisa (S.L.549.44);
 - Special Area of Conservation (SAC) – International Importance / Natura 2000 - Żona fil-baħar fil-Grigal ta' Malta [Marine Area in the Northeast of Malta] (GN 851 of 2010);
 - Special Protection Area (SPA) – L-Baħar ta' Madwar Għawdex;
 - Protected Beaches – Ir-Ramla taċ-Ċirkewwa (S.L. 549.42); and
 - Ċirkewwa Marine Park – limits of lċ-Ċirkewwa and Il-Qammieħ (LN 51 of 2006; S.L. 549.181).
34. **Figure 7** shows the cultural heritage designations in the vicinity of the Scheme Site.
35. The cultural heritage designations in the vicinity of the Scheme Site include two shelters (Grade 2 Military Architecture – GN 895 of 2002) and their buffer zone.
36. On the shoreline west of the site at Il-Ponta tal-Marfa, other features recorded include discoveries of Quaternary deposits in 1935², and 1977³.

² Report on the work of the Museum Department for 1935-36 [Accessed online: <https://schmalta.mt/wp-content/uploads/2022/09/1935-1936.pdf>]

³ Report on the work of the Museum Department for 1935-36 [Accessed online: <https://schmalta.mt/wp-content/uploads/2022/09/1935-1936.pdf>]

Figure 1: Location of site



Figure 2: Land uses



Figure 3: Images of the Surrounding Land Uses



Existing Paradise Bay Hotel



Ćirkewwa Police station



Ćirkewwa Ferry and bus terminals



Kiosk next to Comino Ferries



Reverse Osmosis Plant



Residential

Figure 4: Geology Map

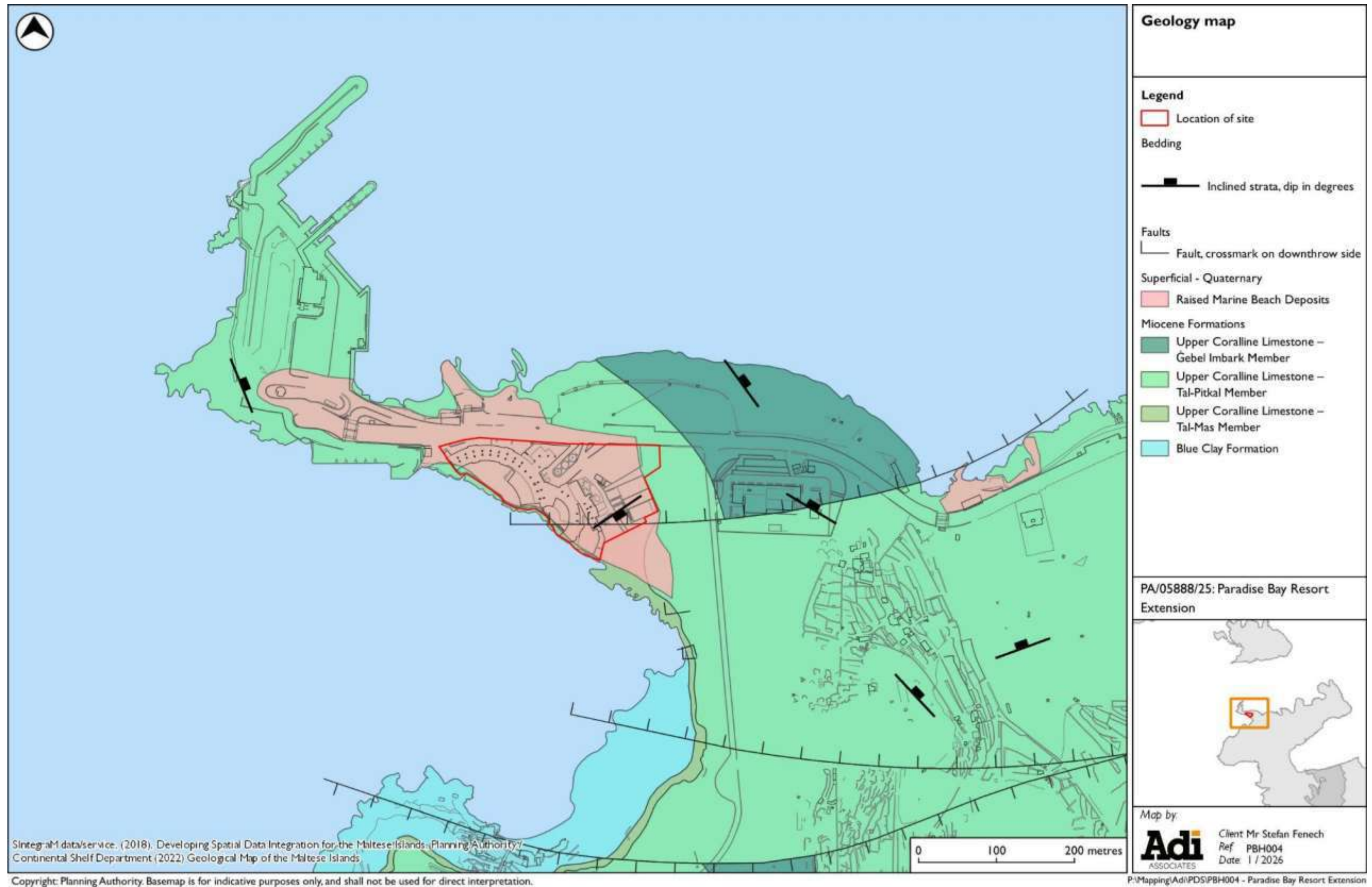


Figure 5: Hydrology map

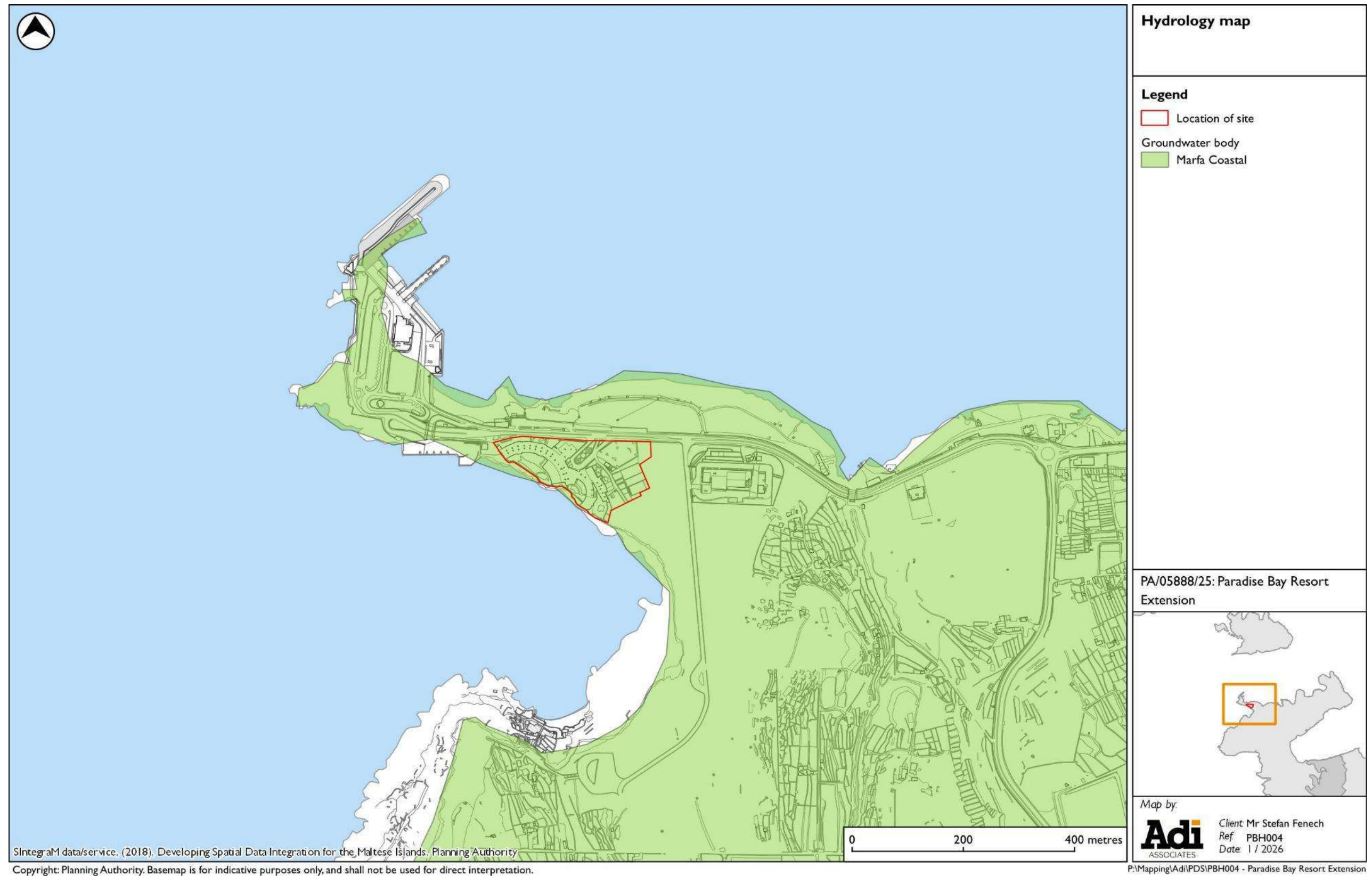


Figure 6: Environmental designations

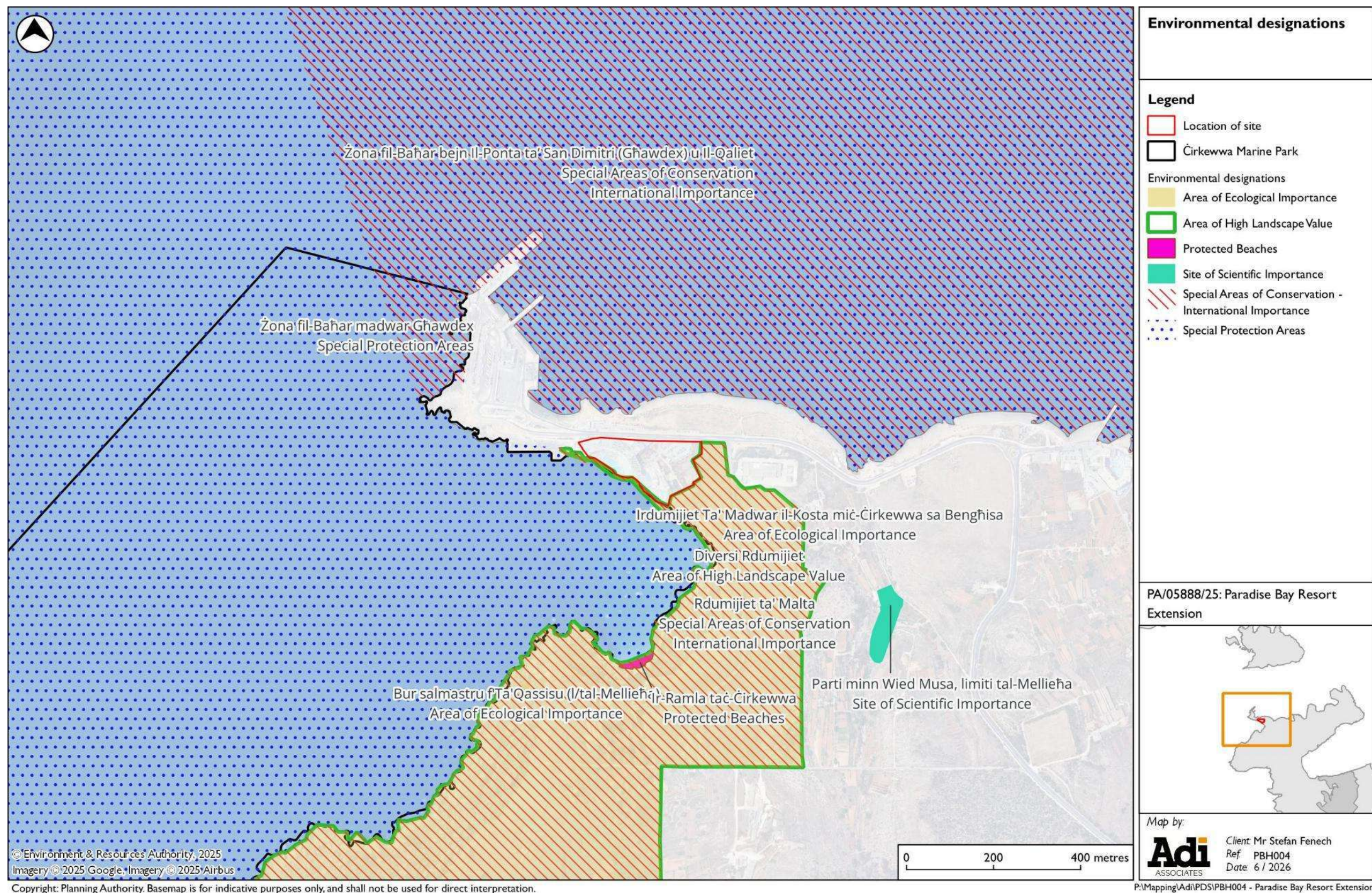


Figure 7: Cultural heritage designations



THE SCHEME

37. The Scheme involves the redevelopment of part of the Paradise Bay Resort, including the addition of two storeys to the hotel's retained block and a lateral extension of the existing hotel building (**Figure 8**).
38. The Scheme involves the partial demolition of the West Wing, comprising an area of 13,867 m². A total of 16,007 m² of the existing West Wing will be retained. Two additional floors (Levels 4 and 5) containing guest rooms will be constructed on the retained wing. The existing pool and associated external decking area will also be reconstructed.
39. The Scheme also includes a lateral extension to the east of the existing block, with a total area of 45,166 m². This section will comprise six above-ground levels. The ground floor will accommodate pools and associated facilities, and food and beverage outlets while the upper levels will include guest accommodation, office spaces, conference and meeting facilities, an auditorium, and gym and wellness facilities.
40. **Table I** shows the breakdown of the Gross Floor Area (GFA).

Table I: Gross Floor Area

Category	Area (m ²)
Existing GFA (Block A)	29,826
To be Demolished (Block A)	13,867
To be Retained (Block A)	15,959
To be Constructed (Block A)	6,473
Proposed New (Block B)	45,166
Total GFA	67,598

Note: for reference to Blocks see Figure 10

41. The total number of guest rooms envisaged following the redevelopment is 506. Out of the existing 275 rooms, 86 rooms will be demolished, whereas a total of 317 new rooms will be constructed. Of these, 231 rooms will be located in the proposed new blocks, distributed as follows: 82 rooms in the South Block, 114 rooms in the North Block, and 35 rooms in the East Wing, as summarised in **Table 2**.

Table 2: Breakdown of Proposed Units

Phase	Units
Existing Hotel	275
To demolish	86
To construct:	317
○ In existing hotel	86
○ In proposed South Block	82
○ In proposed North Block	114
○ In proposed East Wing	35
Total proposed number of units	506

42. Basement Levels 1 and 2 will accommodate underground parking, water storage reservoirs, back-of-house facilities, plant and support infrastructure, as well as storage and ancillary services.
43. A total of 264 parking spaces is proposed, compared to the 92 existing spaces; of these, 127 spaces will be located at Basement Level 1 and 137 spaces at Basement Level 2.
44. **Figure 8** shows the block plan and **Figure 9** shows the superimposed plan. **Figure 10** shows the comparative areas and footprint between the existing and the proposed uses. **Figures 11 to 19** show the floor plans of the proposed extension. **Figures 20 to 22** show the sections. **Figures 23 to 27** illustrate the height profile of the Scheme, and the changes relative to that of the existing hotel. At its maximum height above street level the proposed hotel will be 6 storeys high. Visual representations are shown in **Figures 28 and 29**.

Access and Parking

45. The resort is currently accessed off Triq il-Marfa, with vehicular access to the site provided via the main entrance road leading directly into the hotel grounds. On arrival, vehicles are directed to an existing surface-level car parking area located to the East of the Scheme site. With the Scheme, the car parking area will be relocated to basement levels 1 and 2. It is envisaged that access to the new underground parking area to be provided as part of the Scheme will also be from the main entrance road. As explained, the Scheme will include a total of 264 parking spaces, compared to the existing 92 parking spaces.

Lighting

46. An External Lighting Work Plan was prepared for the existing hotel in 2024 to outline mitigation measures aimed at reducing the impacts of external lighting on avifauna. The plan identified a total of 549 external luminaires installed throughout the hotel, comprising nine different types of light fittings. Various mitigation measures were proposed to address light pollution from the luminaires on site.

47. The architects advise that the proposed redevelopment focuses activity within the central portion of the site and increases the setback from the eastern boundary. This design approach is expected to contribute to a reduction in potential light spill toward sensitive areas. External lighting within this zone will be limited and carefully contained within the site, ensuring very low levels of light spill beyond the site perimeter (less than 2 lux).
47. Moreover, energy-efficient lighting solutions will be adopted, specifically LED fittings with a correlated colour temperature of less than 2800K. All lighting installations will incorporate appropriate cut-off fixtures to prevent upward light spill and minimise light dispersion into the night sky.

Landscaping

48. The landscape consultant advises that the landscape design will prioritise the identification and use of native plant species typical of the surrounding habitats and coastal environment. Where appropriate, climatically compatible non-native species may also be incorporated to meet specific functional, spatial, and aesthetic requirements within the hotel grounds.
49. All non-native species will be carefully assessed to ensure they are non-invasive, ecologically compatible, and unlikely to spread into adjacent natural habitats. Preference will be given to low-risk species, particularly medium to large shrubs and plants with limited wind-dispersal potential.
50. The landscaping approach will also focus on providing shade, shelter, screening, and privacy, while enhancing visual and sensory qualities such as texture, seasonal interest, foliage, flower colour, fragrance, and tactile value. In addition, planting will aim to support local biodiversity by including species beneficial to pollinators and other fauna.
51. The landscaping interventions will be implemented across the following levels: Level -1 will include planters at pavement level; Level 0 will comprise landscaped areas in various locations, including the pool area; Levels 1 and 2 will feature planters on various terraces; Level 3 will include landscaping of the green roof, terraces, and outdoor foyer; and Level 4 will consist of landscaped terraces. The species list and planting proposals are provided in **Appendix I**.

Figure 8: Proposed Block Plan

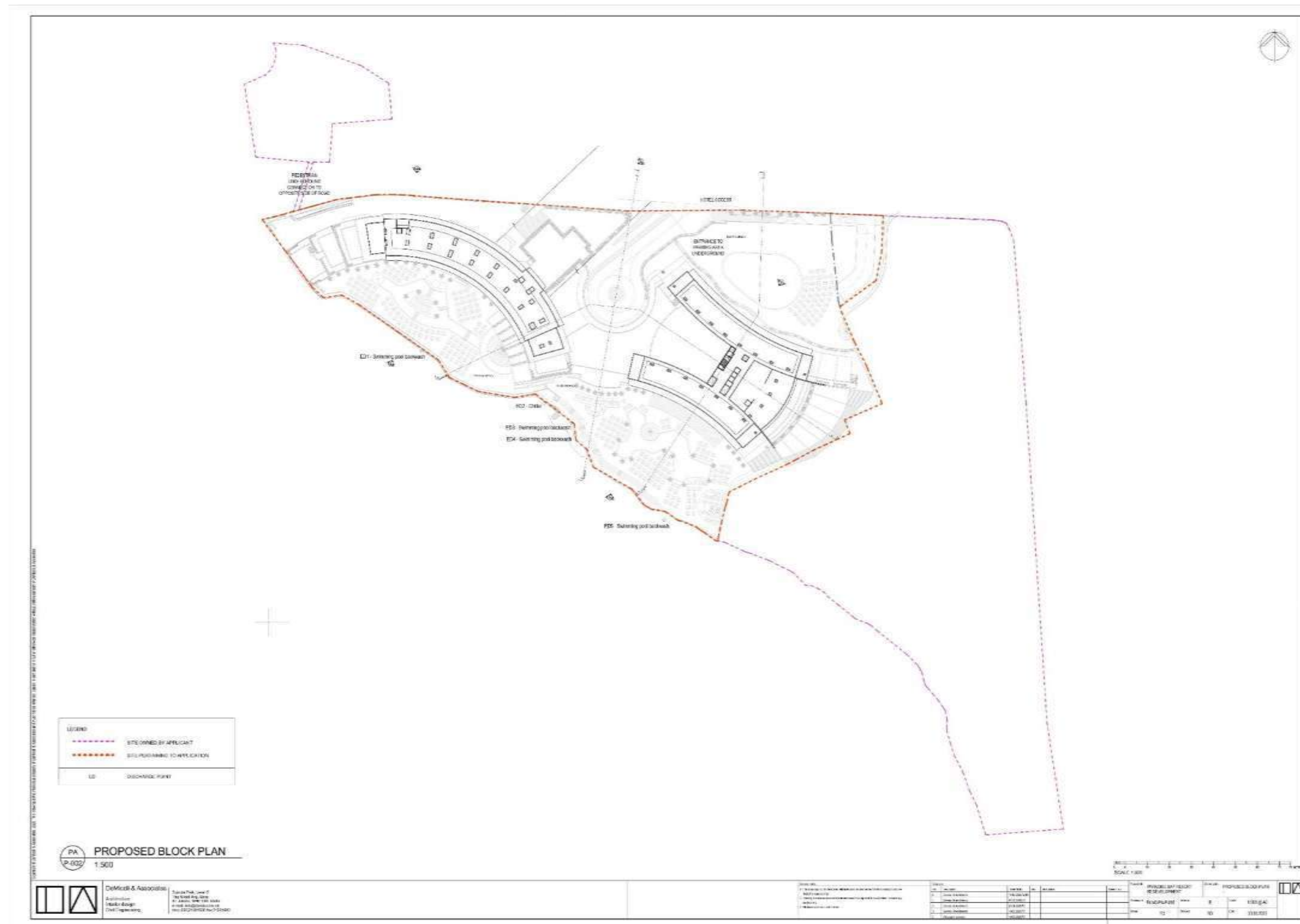


Figure 9: Superimposed Plan

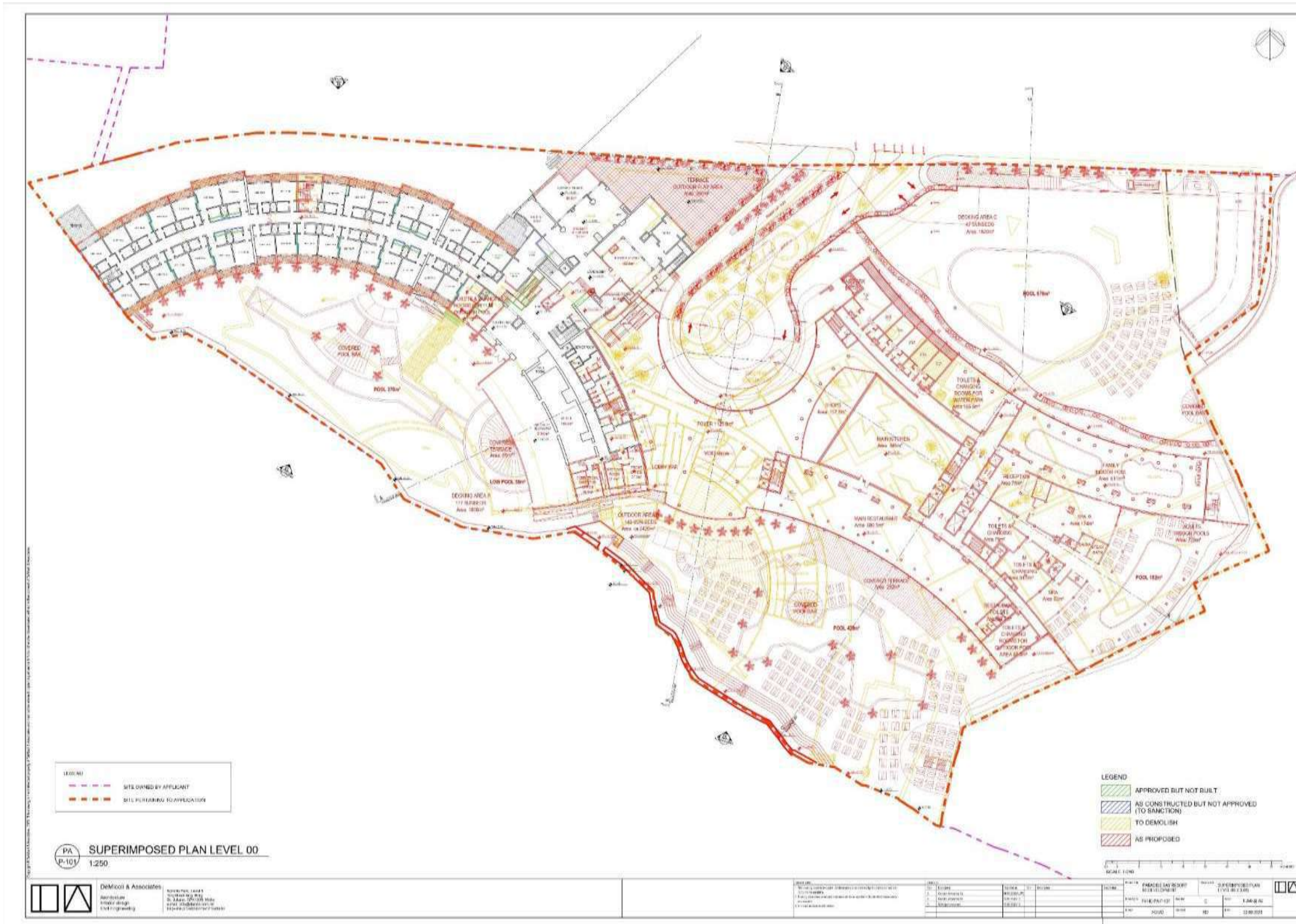


Figure 10: Comparative areas and footprint

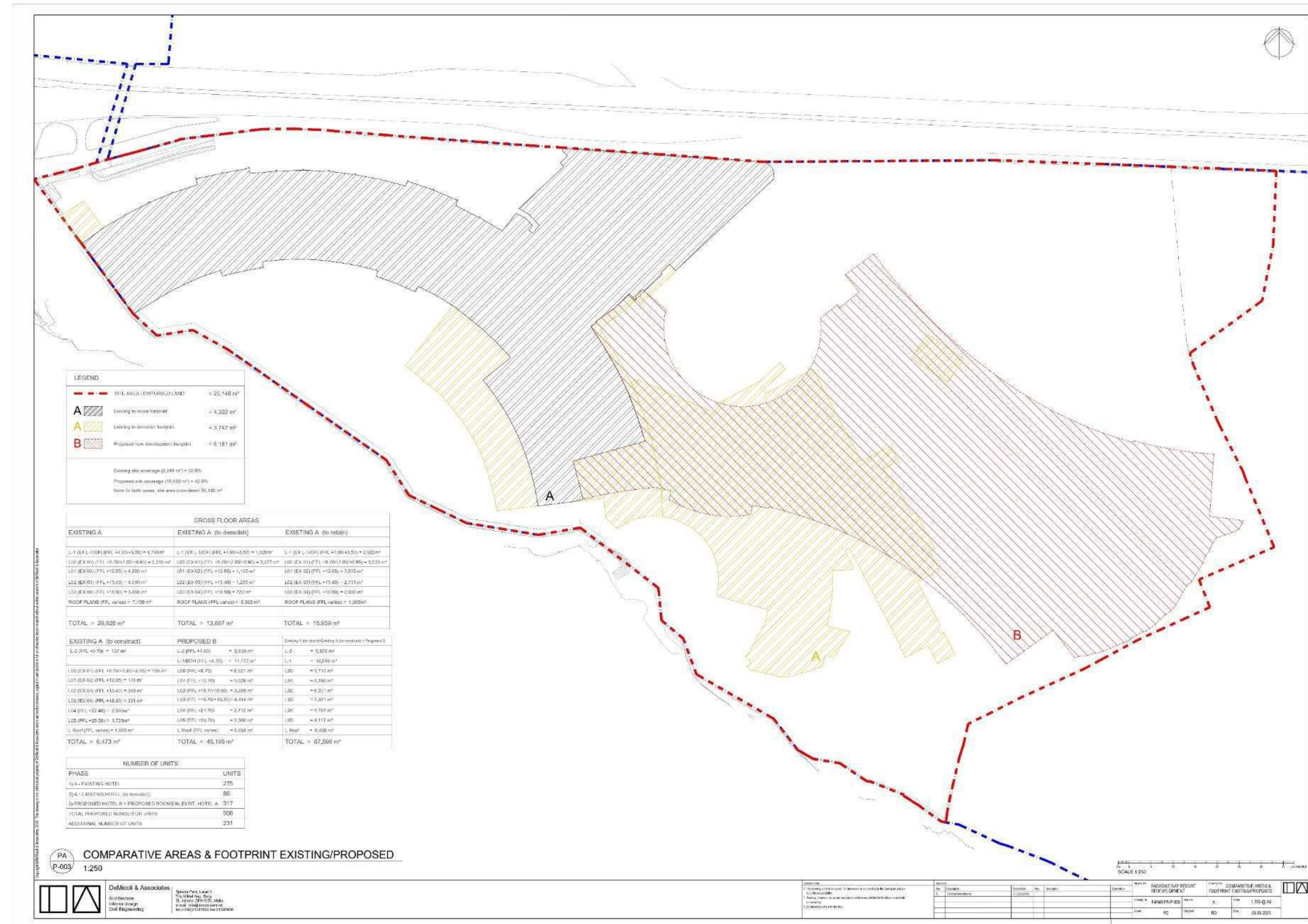


Figure 11: Proposed Plan Level -2

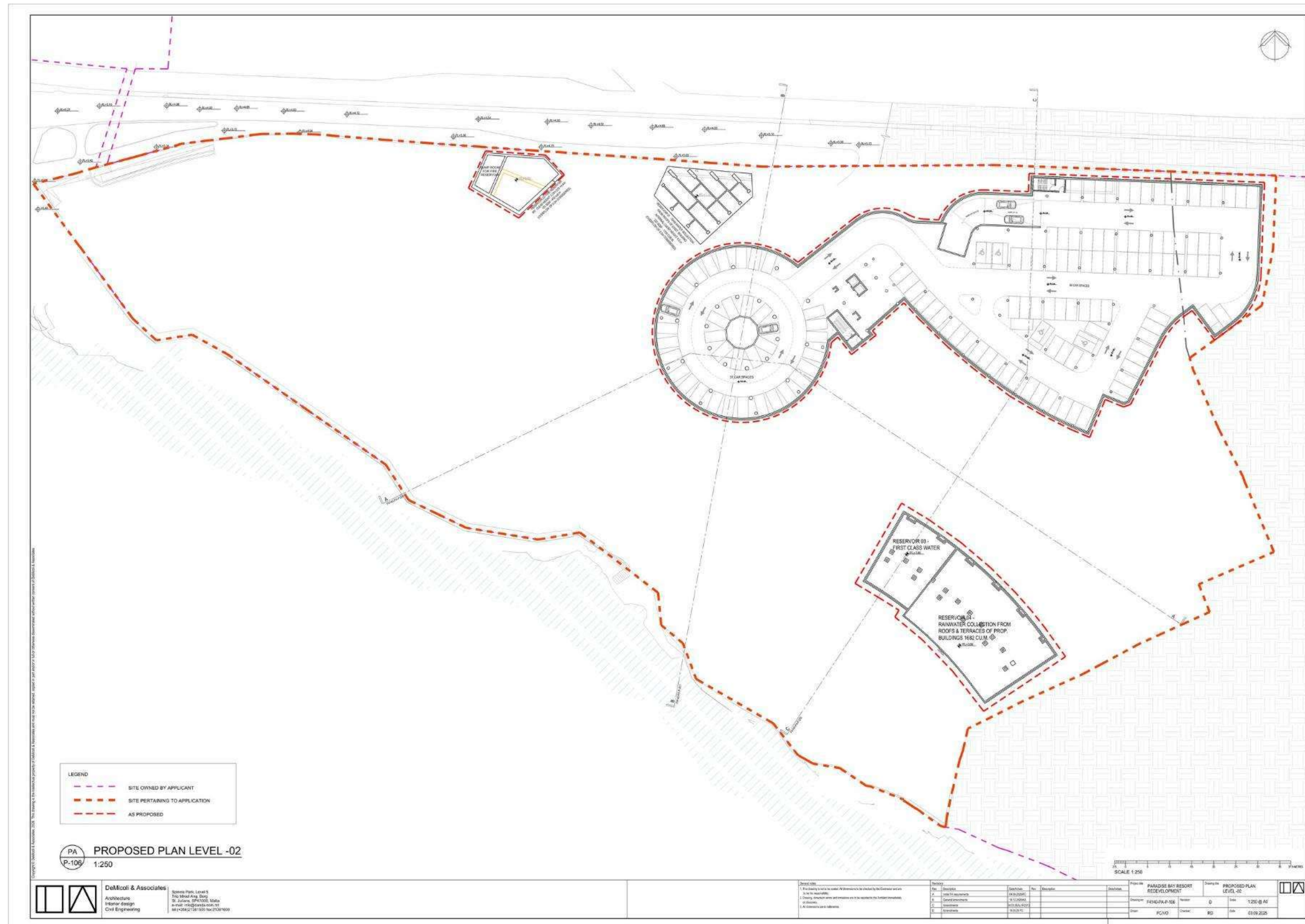


Figure 12: Proposed Plan Level -I



Figure 14: Proposed Plan Level 1



Figure 16: Proposed Plan Level 3



Figure 17: Proposed Plan Level 4



Figure 18: Proposed Plan Level 5





Figure 20: Section A-A

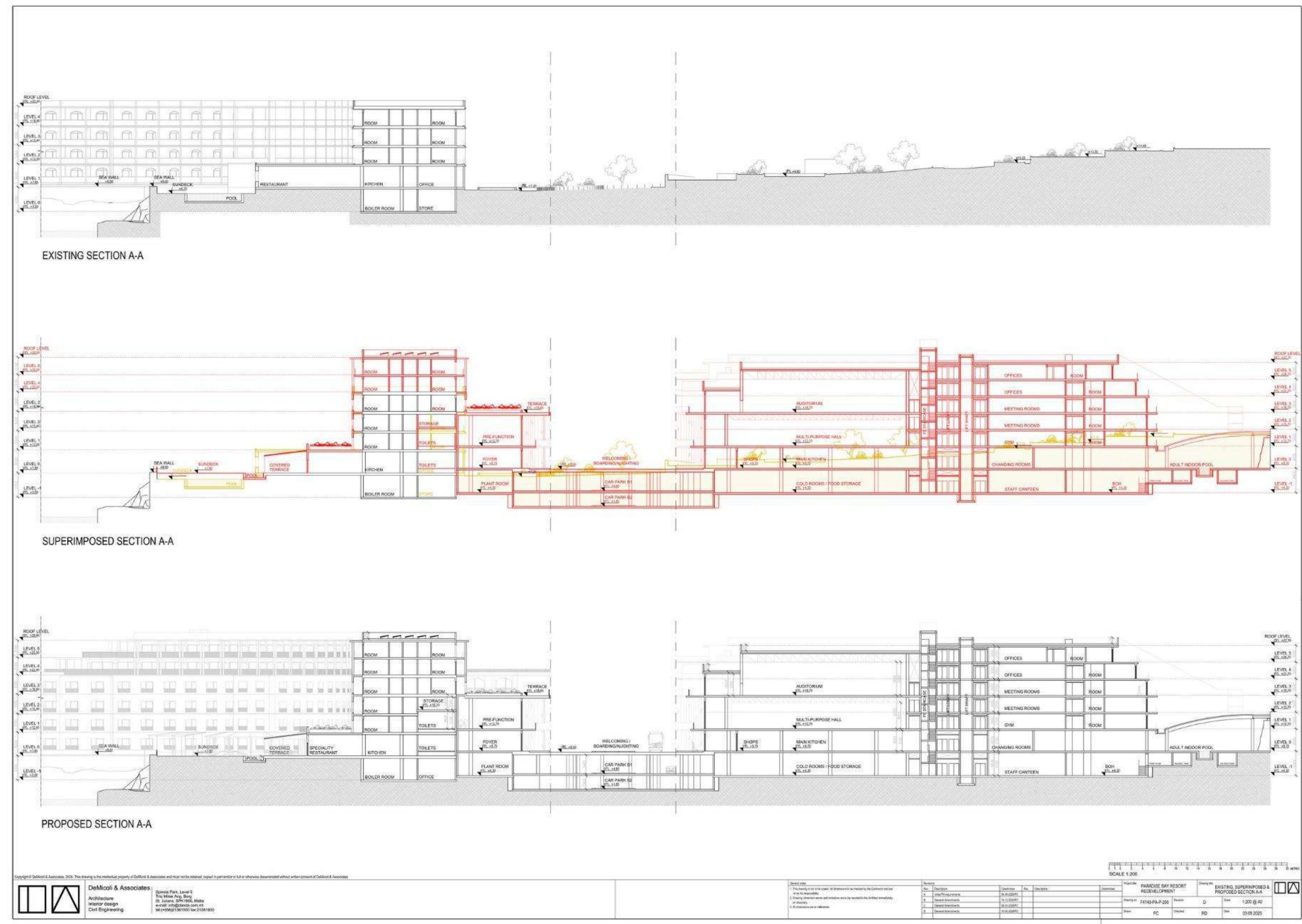


Figure 2I: Section B-B

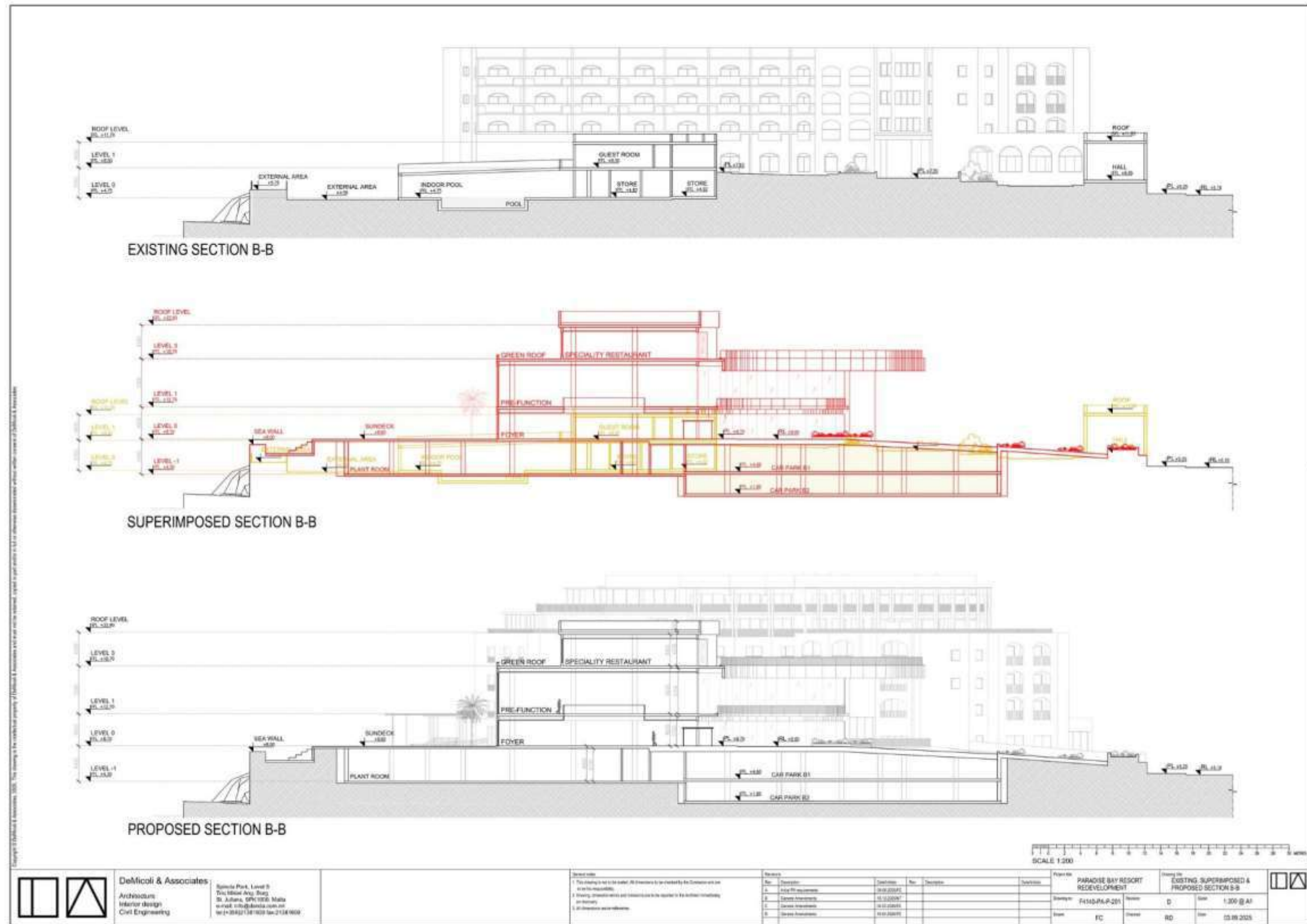


Figure 22: Section C-C



Figure 23: Proposed Streetscape Elevation



Figure 24: Existing, Superimposed & Proposed North Elevations A

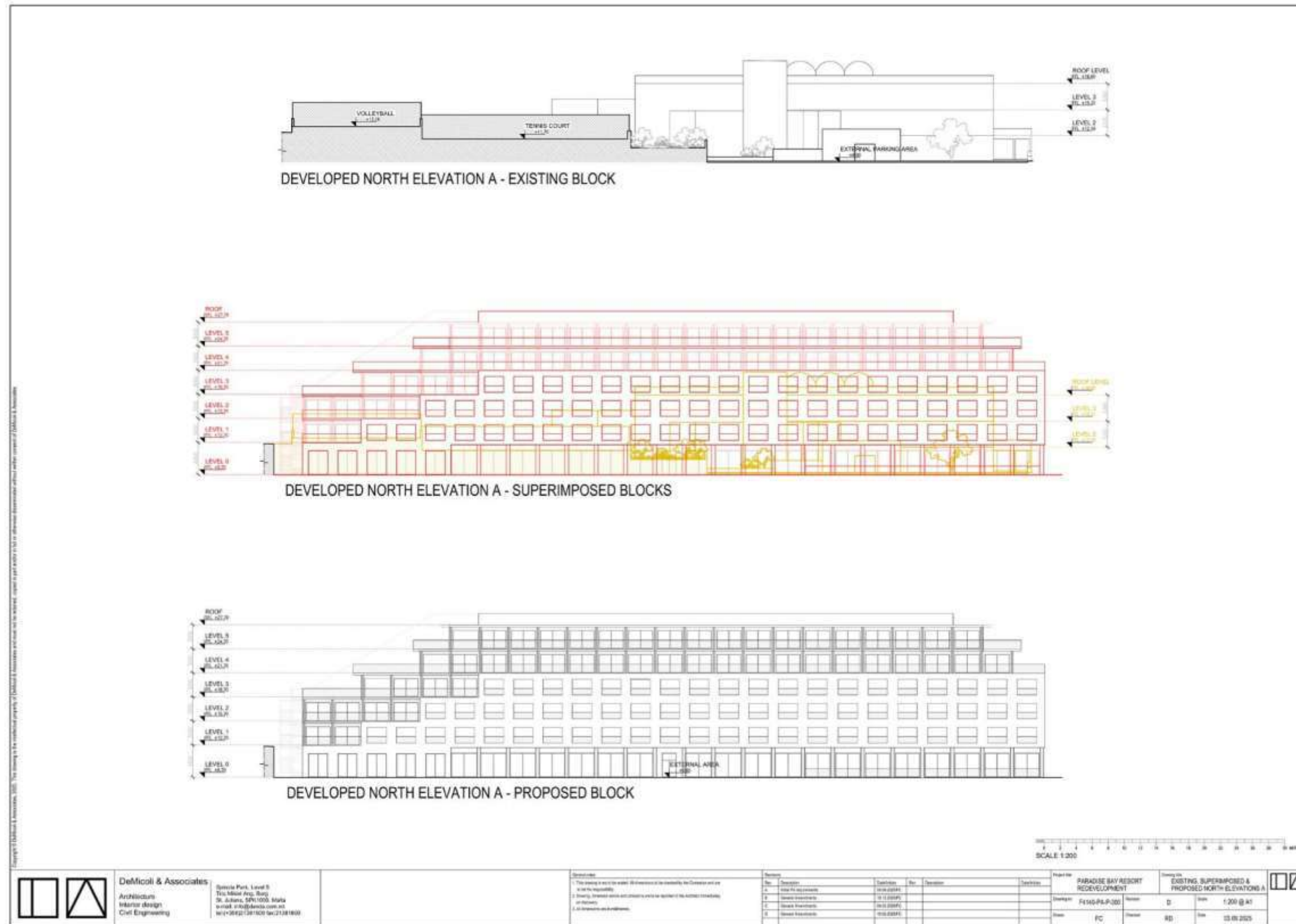


Figure 25: Existing, Superimposed & Proposed North Elevations B



Figure 26: Existing, Superimposed & Proposed South Elevations A

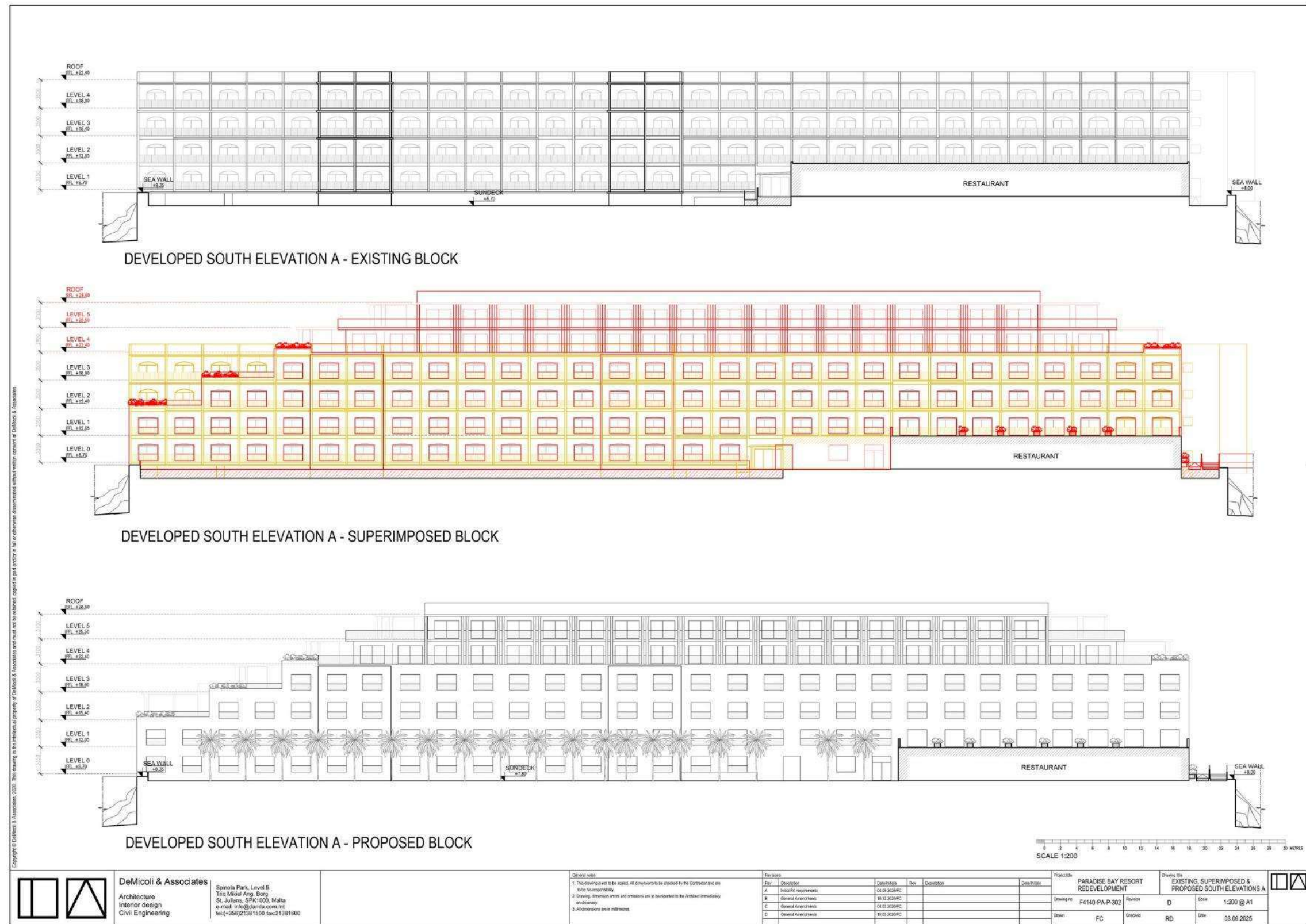


Figure 27: Existing, Superimposed & Proposed South Elevations B

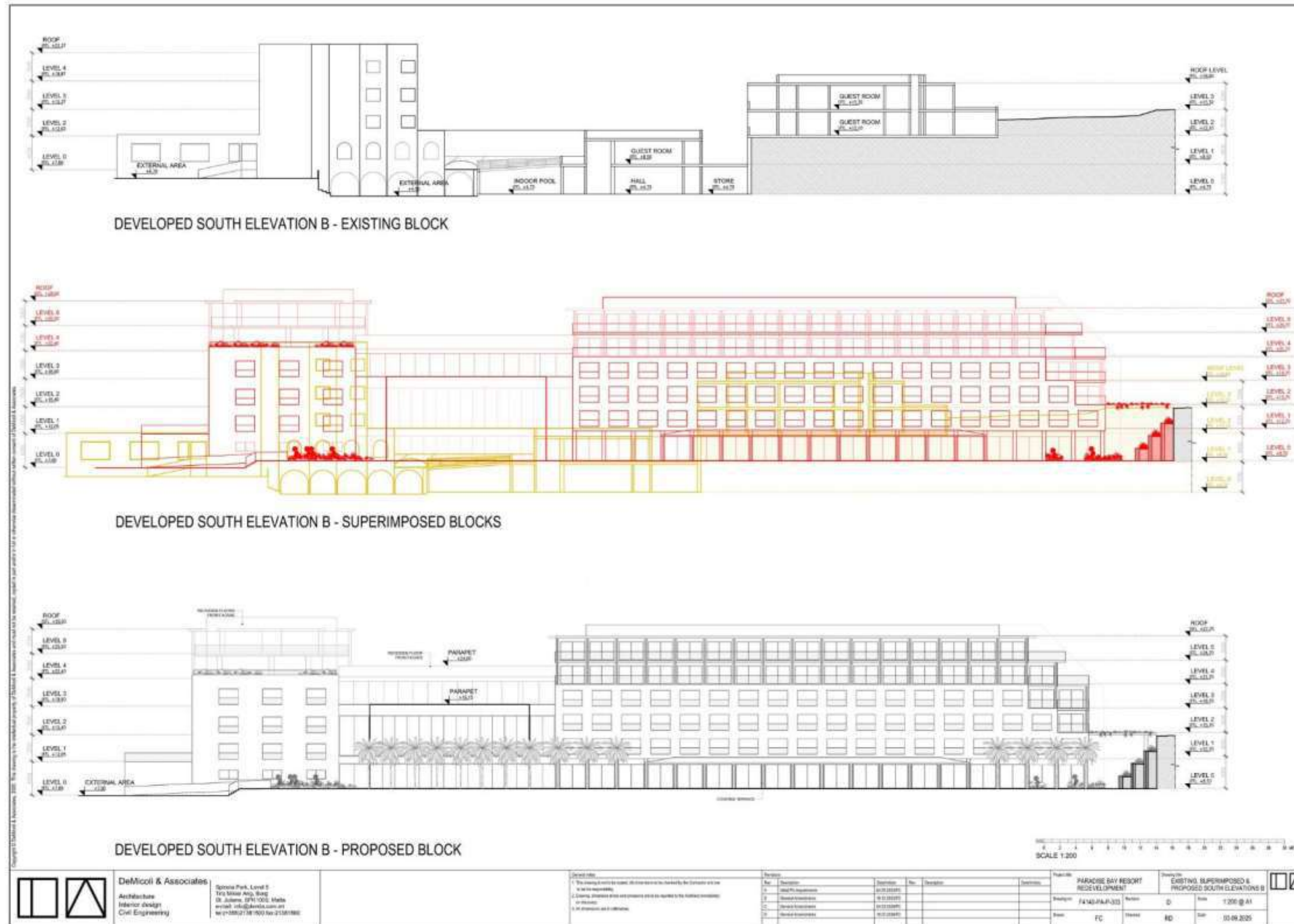


Figure 28: Visual of the Proposed Scheme from Triq il-Marfa



Figure 29: Visual of the Proposed Scheme from Paradise Bay



RESOURCES

52. The Applicant explains that the Scheme incorporates a number of measures intended to improve environmental performance, particularly in relation to energy and water consumption.

Energy

53. The Applicant has provided figures for the existing hotel (2025), indicating an annual electricity consumption of approximately 2,384,630 kWh.
54. An existing main substation serving the hotel is located at basement level I within the back-of-house area. In addition, a third-party substation is proposed at the far end of the site.
55. The Applicant indicates that the Scheme will incorporate photovoltaic (PV) panels, energy-saving light fittings, and motion sensors in areas requiring intermittent lighting. Additional measures include the installation of door sensors to prevent the operation of air conditioning when apertures are open, as well as improved thermal performance through double glazing with thermal break apertures and insulation of roofs and external walls.

Water

56. In terms of existing consumption (2025), the existing hotel utilises approximately 30,206 m³ of fresh water, 5,879 m³ of second-class water, and 796 m³ of grey water.
57. The Scheme proposes the construction and use of multiple reservoirs. These include a first-class water reservoir supplied via reverse osmosis, and rainwater reservoirs divided into two phases. An existing reservoir, with an approximate capacity of 1,220 m³, is located below ground between the road and the hotel. Two additional reservoirs are proposed at Level B2, providing a combined capacity of approximately 1,680 m³.
58. Foul water from Level 0 upwards will be connected to the existing government mains located in front of the site. Drainage will be conveyed by gravity, with pipework routed from high-level basement I (B1). Levels, flow rates, and the separate collection of grey water are currently being assessed.
59. Drainage generated at basement levels (B1 and B2) will be directed to a dedicated sump, which is yet to be designed, and subsequently pumped to the government mains, either directly or via connection to the gravity system. The final configuration of this system is still under study.
60. The Applicant explains that the Scheme will incorporate a number of water-saving measures, in addition to rainwater harvesting such as reverse osmosis systems, dual flushing systems, sensor-operated water mixers, drip irrigation, and reduced water pressure in showers.

Raw Materials

61. **Table 3** provides estimates of the raw materials required for the construction of the Scheme.

Table 3: Estimated Raw Materials for Construction

Material	Estimated Quantities
Concrete	31,153 m ³
Steel	5,999 tonnes
Bricks and panels	111,120 m ²

62. It is envisaged that the proposed extension will be primarily constructed using load-bearing masonry, supported on a reinforced concrete transfer structure located at the existing roof level. This transfer structure will distribute vertical loads to the reconstructed perimeter balcony fin walls and to the existing central service shaft walls within the floor plate. Subject to the outcome of ongoing structural investigations and material testing, localised strengthening of the internal shaft walls and service corridor structures may be required.

SCHEME CONSTRUCTION

Construction Phasing

63. The works are intended to be divided into two phases, Phase 1 will be the alterations to the existing hotel, the construction of the two extra floors and the excavation of the basement needed for the new section of the hotel. Phase 2 will be the construction and finishing of the new section of the hotel. Access for construction vehicles for Phase 1 will be from the existing entrance. During this period, the hotel will be closed completely for visitors. It is intended that Phase 1 of the hotel will start operating for the summer of 2028 and construction of Phase 2 will start in this period. The completion of the whole project is projected to take up to June 2030.

Construction Equipment and Machinery

64. With regards to machinery, it is envisaged that at least two tower cranes will be installed for Phase 1. As mentioned, access to Phase 1 will be from the existing road system of the hotel. The contractor will use concrete bowser trucks, trailers for bringing in steel reinforcement and concrete blocks, concrete pumps and general trucks for the disposal of material.
65. Excavation will be carried out using a combination of pneumatic diggers, saw cutters, rotating blade machinery. Large trucks and mechanical shovels will be needed to take away the material from site. It is envisaged that at least two mechanical shovels and at least ten trucks will be needed on a daily basis.

66. For Phase 2, access will be shifted to the east of the site. It is envisaged that between three to four tower cranes will be needed for this phase (**Figure 30**). The same machinery as per Phase 1 will be utilized.

Construction Traffic Arrangements

67. Access during Phase 1 will be through the existing main entrance to the hotel, as illustrated in **Figure 31**. The south-eastern section of the hotel will be demolished to facilitate construction vehicle access into the pool area. All works will be contained within the site boundary, and no disruption to the main road leading to the Ćirkewwa Ferry Terminal is anticipated.
68. Construction vehicles will exit the site via the same access point. Vehicles will proceed to the nearby roundabout adjacent to the terminal and return towards the centre of the island in accordance with standard traffic circulation.
69. Upon completion of Phase 1, this access road will be reinstated and upgraded to serve as the primary access point for visitors.
70. Access for excavation works and Phase 2 activities will be provided through a new opening along the same road, located further east of the existing. This access will provide direct entry to the proposed basement excavation area, where most of the works will take place.

Employment

71. **Table 4** below lists the number of workers that may be required for each phase.

Table 4: Envisaged employment during construction

Phase 1	Construction	40 workers
	Mechanical and Electrical	35 workers
	Finishing	50 workers
Phase 2	Excavation	20 workers
	Construction	100 workers
	Mechanical and Electrical	80 workers
	Finishing	100 workers

Figure 30: Tower Crane Positioning

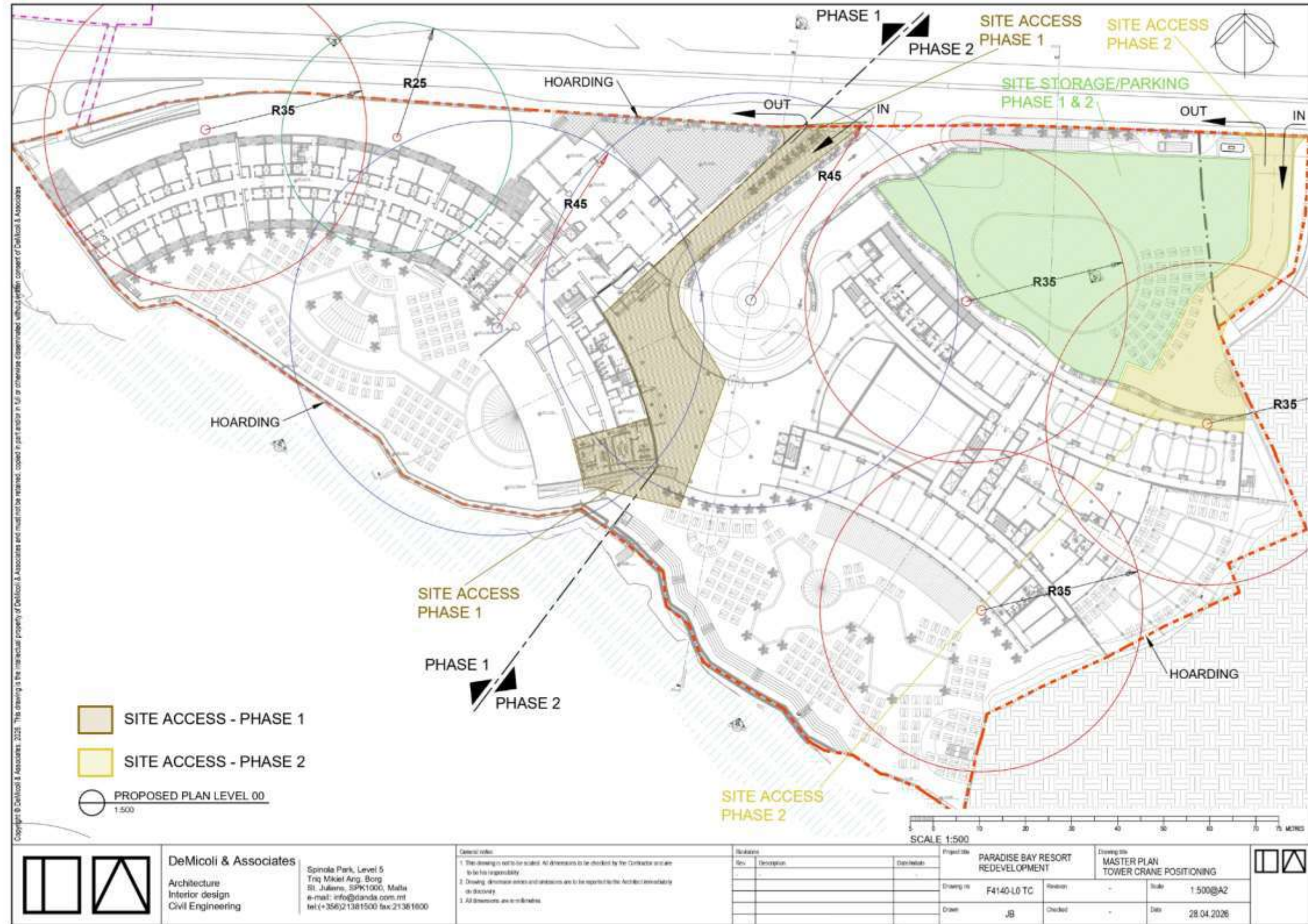
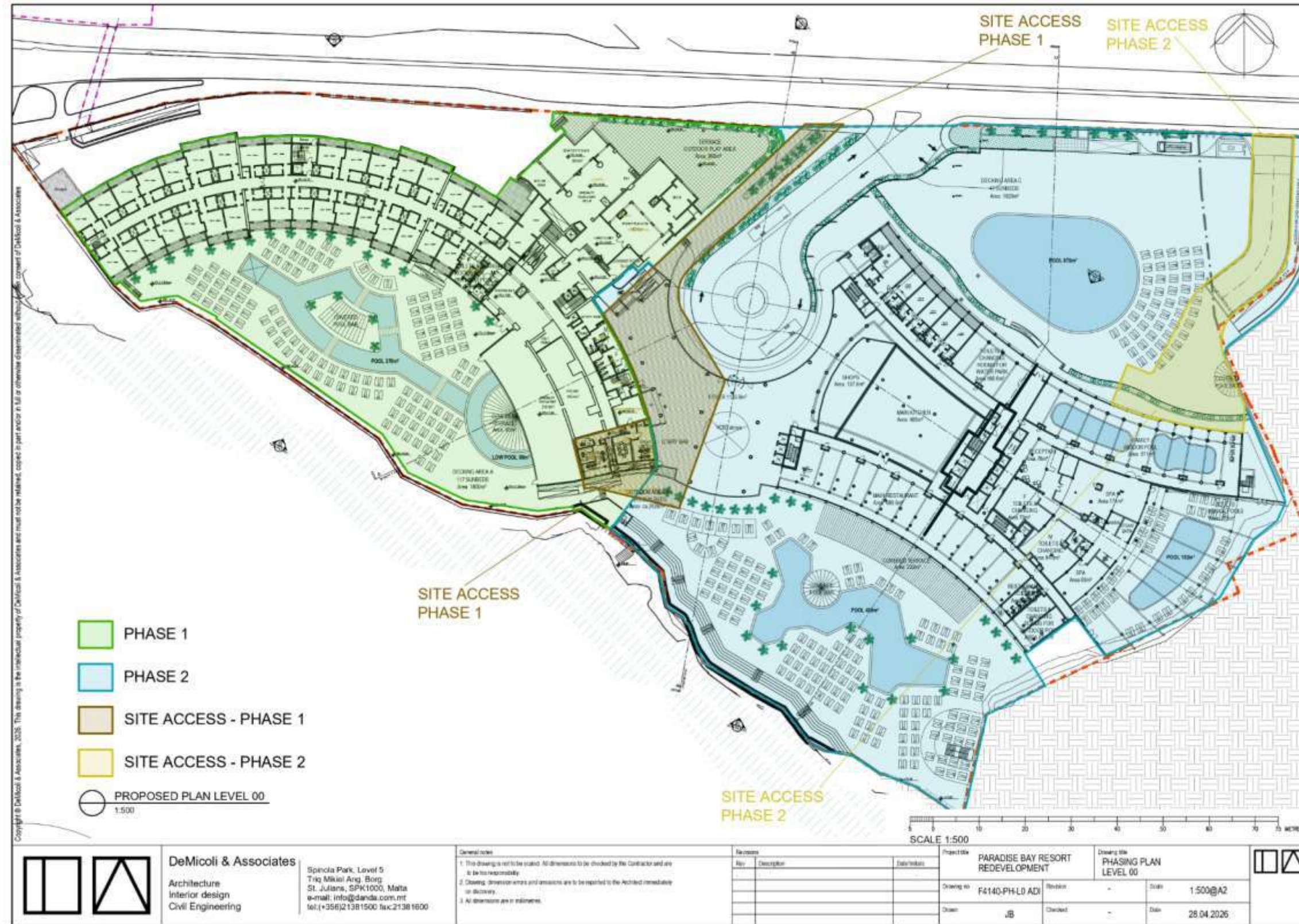


Figure 31: Phasing Plan



WASTE MANAGEMENT

Construction Phase

72. **Table 5** outlines the types of waste envisaged to be generated during the construction of the Scheme. Waste generated during construction will primarily consist of excavation waste. The topsoil removed from the site will be reused for the new landscaping. It is also intended to reuse some of the excavated stone on site, as fill. The remaining excavation waste will be deposited or recycled at a licensed facility, as appropriate. It is also intended to reuse some of the inert demolition waste on site; the remaining inert waste from demolition will be deposited or recycled at a licensed facility, as appropriate.

Table 5: Estimates of Construction Waste

Phase	Type of Waste	EWC Code	HP Code ⁴	Estimated Quantity	Final Disposal
Demolition	Stone (from walls / rooms)	01 04 07 01 04 08 01 04 10 01 04 13	-	7,802 m ²	Licensed inert landfill
Excavation	Rock (including gravel / torba)	01 01 02 17 05 04	-	95,495 m ³	Reused off-site or disposal for recycling at licensed inert facility
	Garden waste	20 02 02	-	20 tonnes	Malta North Waste Treatment Plant / Għallis non-hazardous landfill
	Soil	20 02 02	-	2,500 m ³	Licensed inert landfill
	Municipal wastes - paper and cardboard; glass; biodegradable kitchen and canteen waste	20 01 01 20 01 02 20 01 08	-	15 tonnes	Licensed inert landfill
Construction / Finishing	Concrete (brick cut-offs)	17 01 01	-	4,057 m ³	Licensed inert landfill
	Bricks	17 01 02	-	23,405 m ²	Sold as scrap metal
	Tiles and ceramics	17 01 03	-	15,603 m ²	Malta North Waste Treatment Plant
	Metal (rebar cut-offs)	17 04 05	-	811 tonnes	Malta North Waste Treatment Plant
	Plastic (packaging waste)	15 01 02	-	30 tonnes	Licensed inert landfill
	Municipal wastes - paper and cardboard; glass; biodegradable kitchen and canteen waste	20 01 01 20 01 02 20 01 08	-	25 tonnes	Reused off-site or disposal for recycling at licensed inert facility

⁴ In accordance with EU Regulation 1357/2014, HP codes only apply when the waste is hazardous.

Operational Phase

73. The existing Paradise Bay Hotel has a nominal complement of 275 guestrooms. However, according to the Applicant, only 235 guestrooms are currently operational, as the existing East Wing is not in use for accommodation and therefore does not generate operational waste. The proposed Scheme will increase the operational capacity to 506 guestrooms, representing an overall growth factor of approximately 2.15 times the current operational capacity. **Table 6** presents the estimated annual waste generation associated with the existing operational baseline and the proposed Scheme.

Table 6: Estimated Current and Proposed waste generation

Waste Stream	Existing Operation (235 rooms)	Proposed Scheme (506 rooms)
Mixed municipal waste	13.20 tonnes/year	28.38 tonnes/year
Glass	13.20 tonnes/year	28.38 tonnes/year
Cardboard	16.73 tonnes/year	35.97 tonnes/year
Metal	0.84 tonnes/year	1.81 tonnes/year
Electronic equipment	0.52 tonnes/year	1.12 tonnes/year
Edible oil	0.90 tonnes/year	1.96 tonnes/year

74. The operational waste will be disposed of by licensed waste contractors, in accordance with the relevant regulations and as described in the Waste Management Plan that Adi Associates are preparing.
75. Moreover, the proposed architectural design incorporates a dedicated waste collection area at Level B1, located adjacent to the unloading zone. This area is designated for waste management purposes and is equipped with docking facilities capable of accommodating the simultaneous loading of two waste collection vehicles.
76. In addition, separate, purpose-designed rooms are proposed to ensure the appropriate handling and storage of different waste streams, as follows:
- Organic waste generated from vegetable preparation and other biodegradable sources shall be stored within a refrigerated area to prevent odour generation and maintain sanitary conditions.
 - Recyclable waste shall be managed within a dedicated room fitted with adequate compacting facilities to optimise storage efficiency and facilitate collection.

POTENTIAL ENVIRONMENTAL IMPACTS

77. Environmental impacts can be negative as well as positive and their assessment is important so as to better define the effects that a proposal may have on its receiving environment. At this stage in the process, a preliminary list of the potential environmental impacts from the construction and operation of the Scheme can be identified. The list identifies only those potential impacts that could be significant.

78. The potential significant impacts from the construction and operation of the Scheme are considered to be:

- ***Impacts on geology and geomorphology, from site excavation***

The proposed extension at Paradise Bay is located within an area dominated by scientifically important Quaternary raised beach deposits. Depending on the extent of the deposits beneath the Scheme site, excavation works may disturb or destroy these important deposits, resulting in the irreversible loss of geomorphological features and paleontologically important strata, leading also to the potential increased susceptibility to erosion of unexcavated areas. Site investigations may be required to determine the extent of the deposit on site. The geology of the area is further influenced by faulting and inclined strata, indicating structurally complex and potentially unstable conditions. Construction near faults requires detailed geotechnical investigation, avoidance, or reinforcement design.

- ***Traffic impacts, both during construction (including heavy-vehicle traffic) and during the operation of the Scheme***

Traffic impacts are expected to arise from construction and the operation of the Scheme, primarily due to the increase in accommodation capacity from 275 to 506 guest rooms.

Impacts on landscape character and visual amenity

The Scheme involves both a lateral extension of the existing development and the addition of two extra storeys. The changes proposed in the Scheme, both in terms of the buildings and the landscaping, are likely to have significant implications for the landscape character and visual amenity of the area, which lies within the Marfa Area of High Landscape Value.

- ***Impacts on marine ecology and water quality, arising from the construction and operation of the Scheme***

Given its proximity to the sea, there could be some negative impacts on the marine environment during the construction of the Scheme, from water run-off, dust and other debris deposition, and general disturbance. With proper adherence to the *Construction Management Site Regulations* (S.L. 623.08), and with the appropriate mitigation measures in place, these impacts could be contained. During the

operational phase, the hotel is expected to opt for discharge of effluent into the sea. The hotel already discharges effluent from the pools and chillers to the marine environment under an environmental permit issued by ERA. The discharge points from the new Scheme are likely to increase and the current environmental permit will require updating. The discharges would need to continue to be monitored. As long as the operations at the hotel continue to be carefully controlled, impacts from discharges to the marine environment are expected to remain of minor significance.

- ***Impacts on avifauna and terrestrial ecology***

The Scheme is adjacent to both a Special Area of Conservation (SAC) and a Special Protection Area (SPA). The site is therefore in close proximity to ecologically sensitive areas. Since these sites are designated to protect habitats and species of European importance, particularly coastal, marine, and avifaunal communities, impacts from construction activities (e.g. excavation, vibration, dust generation) and operational pressures could disturb species that rely on these habitats, including breeding and/or migratory birds.

During any nighttime construction and especially during operations, of particular concern is the potential impacts from external lighting on the colonies of seabirds in the north of Malta. Evidence of strandings of fledglings in the Ċirkewwa area have already been documented and the Conservation Objectives for the Specially Protected Areas call for a control of lighting and retrofitting of existing luminaires to minimise the impact on seabirds.

- ***Impacts on energy and water resources, arising from the operation of the Scheme***

Although the Scheme will incorporate some passive design measures to reduce energy consumption and the reuse of rainwater, some impacts on energy and water resources are likely given the scale of the increase in the number of guestrooms and the intensity of use on the site.

- ***Impacts arising from construction activities, in relation to noise, vibration, dust, and surface water management***

The potential impacts arising from dust emissions during construction are identified above. Any noise and vibration emissions arising during the construction of the Scheme are also likely to be short term and temporary. There is the potential for surface water run-off to impact the marine environment, as mentioned. Again, with proper adherence to the current construction site regulations, and with the appropriate mitigation measures in place, these impacts could be limited. Measures for mitigating the impact from construction activities, including water run-off, will be addressed in the Construction Management Plan (CMP).

MITIGATION PROPOSALS

79. Preliminary potential mitigation measures associated with the identified impacts during the construction and operation of the Scheme include:

- The proposed excavation will likely obliterate the scientifically important quaternary raised beach deposits underlying the Scheme site. This will be a loss of major scientific importance and cannot be mitigated unless the excavation is eliminated from the Scheme. The current surface car park has to an extent protected these deposits, but the proposed excavation will destroy these forever. Depending on discussions with ERA and SCH, there may be scope to undertake limited trial investigations to determine the extent of the deposit beneath the Scheme site. A re-design of the Scheme to eliminate deep excavations may be required to save these deposits.
- Should excavations be allowed, these should be monitored for any palaeontological material and the excavation site should be treated as an investigation pit and excavations undertaken in a scientific manner to record the deposit in line with terms of reference to be issued by the SCH.
- Attention to the stability of the coastal geology and the development of an excavation and construction methodology which takes account of this, including geotechnical investigations, appropriate retaining structures, and monitoring of ground movement during excavation works. This is to include the erosion potential of the underlying cliff face, which has already suffered from collapses not far from the Scheme site.
- Recycling and reuse of the inert demolition / site clearance waste and excavated material on and/or off-site.
- Implementation of good construction practice in accordance with the *Construction Management Site Regulations* (S.L. 623.08), to minimise dust deposition outside of the Scheme site, to minimise construction noise impacts, and to avoid issues of ground water and surface water pollution.
- A Construction Management Plan (CMP) having:
 - measures to control dust spread, including regular spraying with water to limit dust emissions, covering of stockpiles and trucks, and cleaning of the site and the access roads at the end of each working day;
 - measures to address the control of noise arising from all stages of the construction. In addition to adhering to the provisions of the Regulations, which will afford a measure of mitigation regarding noise at certain times of the day to safeguard neighbours, the CMP should detail working hours and the types of plant / machinery to be used, as well as outline measures for the control of noise at source;
 - measures to address issues of ground water and surface water pollution arising from the construction of the Scheme, including the use of silt traps, sediment control measures, bunded storage areas for fuels and chemicals, and appropriate drainage management; and

- measures regulating construction traffic, including designated access routes, scheduling of deliveries to avoid peak traffic periods, and on-site parking arrangements for workers
- Monitoring of noise and dust during all phases of the construction. If noise and dust levels become significant, or if evidence of significant noise and / or dust impact is observed and / or reported, works should be reassessed and alternative methodologies and / or more appropriate noise and dust control measures should be investigated and put in place. This investigation should be discussed and agreed with the relevant competent authority.
- Adoption of operational management practices optimising the collection and reuse on site of rainwater, having regard to the requirements of the Building Regulations Technical Guidance Part F (Conservation of Fuel, Energy and Natural Resources).
- Ensuring compliance with waste management regulations and the adoption of best practice in relation to operational waste management.
- Implementation of measures to minimise impacts on marine water quality during construction, including the prevention of sediment-laden runoff, the use of appropriate containment systems, and the prohibition of direct discharge of untreated water into the marine environment.
- Implementation of ecological protection measures, including the avoidance of works during sensitive periods for avifauna where feasible, minimisation of disturbance to nearby Natura 2000 sites, and the restoration of disturbed areas through appropriate landscaping using native species. In general, works are to be restricted to between sunrise and sunset. Should nighttime work be required on specific occasions (such as concrete pours of whole floors), the contractor will request special one-off permission from ERA. Such works will be planned in advance and appropriate lighting provided that will be kept to the minimum required for the specific works (no site wide floodlighting), and oriented to minimise light spill and adhere to ERA's draft guidance with regards to luminaries and the type of light emitted.
- Implementation of a landscaping scheme that is sensitive to the surrounding environment including the use of appropriate species in line with the MEPA Guidelines on landscaping in areas outside the development zone.
- Adoption of appropriate landscape and visual mitigation measures, including the use of materials and colours that integrate with the surrounding environment, soft landscaping, and the provision of screening to reduce visual intrusion from key viewpoints.
- Implementation of a sensitive lighting strategy to minimise light spill, including the use of directional, low-intensity lighting, motion sensors, and the avoidance of

unnecessary illumination in areas facing environmentally sensitive zones. The lighting scheme is to follow the draft guidelines for external lighting issued by ERA.

Appendix I: Species List and Planting Proposals