

## MALTA

### Legislative and Administrative Parameters

The earliest form of legislation for Heritage conservation goes back to 1925 with the Antiquities (Protection) Act. A list of protected sites was formulated in 1932 and it was intended that the list be amended from time to time. This failed to materialise. The Museums Department is responsible for the Antiquities list. Currently the whole administrative body and the act are being revised. Listed sites (in terms of the act) are now also being protected and monitored systematically by the Planning Authority.

The problem of protecting significant local heritage was again

tackled in 1991 with the promulgation of the Environment Protection Act (Act V of 1991). Through this act the Minister responsible for the Environment has the power to declare any natural or cultural site as protected. The Environment Protection Department is responsible for parks protected under the EPA. A good proportion of the sites protected under this act have now also been scheduled by the Planning Authority.

The Development Planning Act, 1992 (amended in 1997) is the latest example in local legislation geared to protect the local heritage. Under the Development Planning Act the Authority is obliged to prepare and from time to time review a list of areas, build-



Casa Ippolito (1664), abandoned and severe structural damage in parts

ings, structures or remains of geological, palaeontological, archaeological, architectural, historical, antiquarian or artistic importance, as well as of natural beauty, ecological or scientific value that are to be scheduled for conservation. The scheduling exercise also provides for the designation of buffer areas, which enable the conservation of sites within a context. The act also provides for the designation of Urban Conservation Areas and, therefore, for the protection of the Maltese village cores.

The legislative framework and administration of conservation areas is, therefore, a fairly recent development in the Maltese Islands. This is partially a socio-political problem, because the State has been independent for only four decades. The Maltese have inherited extensive heritages assets but also the administration and management of them! Whereas maintenance works of extensive government property were possible with Imperial or European based financing, how is the national government expected to maintain this patrimony – which survived through 500 years of history? Does the Maltese Government have too much heritage to handle?

However, using the processes already in place, much has been achieved in the field of protection. It is calculated that during the last decade the percentage area that has been designated for conservation has doubled. It has increased from 10% to 20% of the whole land area of the Maltese Islands. Still, the establishment of scheduling and the safety network is not enough. Management and monitoring of sites is vital for the survival of heritage for future generations. Aspects of Maltese heritage are still at extreme risk and the terrorist act committed on the Mnajdra (one of the most important monuments of World Heritage status) shows the extreme conditions under which heritage is managed or mismanaged.

## Survey and Methodology

A survey that took into account heritage assets at risk was developed in two parts. The first part of the survey included ten candidate sites termed 'endangered sites'. In 1999 ICOMOS (Malta) had organised a competition for the nomination of endangered sites: the competition was open to local councils, non-government organisations and government agencies. The survey considered these endangered sites (six cultural and four archaeological) and their assessment, and extended it to twelve archaeological sites (mostly Class A) and another twelve included in the architectural category. The survey also included the monitoring of three urban conservation areas.

The aspects taken into account in the assessment of the various properties were the following:

1. Maintenance Deficiency,
2. Risks from Social and Collective Behaviour,
3. Insufficient Conservation Standards,
4. Development-Related Risks,
5. Compromised Values.

These were in turn subdivided and given values from LEVEL 1 to 5, with the latter being the worst factor. The results of the assessment under these sections provided a level of risk graded with the following system:

NOT AT RISK	no significant risk	LEVEL 1
VULNERABLE	early signs of risk without tangible effects	LEVEL 2
AT RISK	early signs of risk with tangible effects	LEVEL 3
GRAVE RISK	severe signs of risk- reversibility still possible	LEVEL 4
EXTREME RISK	intense signs of risk without possible reversibility	LEVEL 5

All the sites were therefore gauged in a holistic and standard format to provide an as objective as possible picture of the situation. The highest graded assets were chosen because these should provide an example for other assets of lesser importance. These are also the critical assets and therefore should be prioritised with rehabilitation, restoration, maintenance and monitoring programmes. Some of these sites are not only of national significance, but also have universal value, and therefore should be specially managed under the parameters of international conventions and charters.

## Archaeological Sites

The twelve candidate sites that were chosen include four of World Heritage status, five Class A sites and one Class B site.<sup>1</sup> Two of the sites are not scheduled but listed as part of the Archaeological National Protective Inventory.

SITE NAME	CLASS	RISK FACTOR
1 Tarxien Temples	A (WHS)	LEVEL 3
2 Tal-Bistra Paleochristian Hypogea	A	LEVEL 2
3 Ta' Gawhar Roman Tower	A (un-scheduled)	LEVEL 5
4 Ggantija Temples	A (WHS)	LEVEL 5
5 Ghajn Dwieli Tombs	B	LEVEL 3
6 Kercem Punic Sanctuary	A	LEVEL 4
7 Kordin Ili Temples	A (WHS)	LEVEL 4
8 Mnajdra Temples	A (WHS)	LEVEL 5
9 Ta' Kaccatura Punico-Roman Villa	A	LEVEL 4
10 San Pawl Milqi Punico-Roman Villa	A	LEVEL 3
11 Ghajn Tuffieha Roman Baths	A	LEVEL 4
12 It-Torrijiet Roman Tower	A (un-scheduled)	LEVEL 4

Out of the twelve sites, the greatest percentage was at level 4 (five sites) followed by an equal number of (three) sites at a risk factor of 3 and 5. Two sites out of four that have World Heritage status – that is Mnajdra and Ggantija – were calculated to be at extreme risk. The other site at extreme risk is the Ta' Gawhar Roman tower, which has not as yet been scheduled, but has been incorporated in the Archaeological National Protective Inventory.

## Insufficient Conservation Standards

All the sites in the list indicated a lack in this section. Even though archaeologists and conservators/restorers are on the increase, there has not been sufficient interventionism or a policy framework for guidance. Although interventions have been less frequent or non-existent in the past 20–30 years, the archaeological fabric has also suffered from past practice and disuse or misuse of conservation ethics. The Roman Baths at Ghajn Tuffieha, Tarxien Temples and Ggantija are typical examples. At Ghajn Tuffieha the rooms built in the 1960s to protect the mosaic were constructed directly onto the original walls. Under this pressure, the frescoed plaster crumbled. The reinforced concrete slabs used to carry mosaic floors (dating to 1934) split, creating further damage. In Tarxien and Ggantija past practices included the use of metal dowels to repair broken stones and the use of portland cement for reconstruction.

Most of the sites were given the appropriate scheduling with significant buffers, but as in the case of most heritage assets, this came as a passive reaction rather than an active one. Even though buffer areas control development and encroachment, there are still problems with illegality in these archaeological sites because of various engineering works. The absence of networking between entities, and of management plans or strategies have affected the sites significantly. The new Heritage Bill, which is to be promulgated later this year, substituting the Antiquities (Protection) Act (1925), is tackling this problem – together with other government agencies involved in heritage protection. Most lacking is management guidance in the conservation field and sufficient human resources to staff the number of sites that are government owned. In fact, half of the sites selected for this list are government-owned sites and accessible to the public. The worst-off in management and policy terms are Mnajdra Temples and Ghajn Tuffieha Roman Baths. Following the recent terrorist attacks, a management plan for Mnajdra is being prepared, whereas a joint venture is being launched for Ghajn Tuffieha. None of the sites have interpretation panels, or interpretation that would meet recognised international standards. Security of the sites is non-existent and some are open to abuse, including vandalism and pillaging.

## Maintenance Deficiency

Natural conditions and processes of deterioration have had significant effects on the surveyed sites. Ggantija, Mnajdra and Ta' Gawhar tower are examples of how these assets have succumbed to serious decay. Ggantija is a text-book case on the various results

of decay of Globigerina and Coralline limestone. Whereas the Coralline blocks are breaking up into sizeable fragments, Globigerina is undergoing surface losses through flaking, powdering and honeycomb weathering. The damage is being caused by severe weathering, dampness, wind action, air-borne salts and drastic changes in temperature. Water seepage and removal of infill are also significant causes of structural damage. At Mnajdra the lithic structures have been undergoing a high rate of erosion, directly affecting the structural stability. The remains at Ta' Gawhar are in imminent danger of collapse. A mature carob that sank its roots in the structure is only part of the cause of disintegration. Cracks and fissures have also resulted from rising damp and salts and spray attack of sea and sand. Ta' Gawhar is also surrounded by establishments that emit airborne pollutants, including the airport, Hal Far and Luqa industrial estates and the dump at Tal-Mara where coal ash used to be deposited. Pollution does not only dirty and stain the stone but creates chemical reactions that will bring about deterioration.

## Risks from Social and Collective Behaviour

The rurality of certain archaeological sites has been a distinct disadvantage compared with other heritage assets, because of inaccessibility. However, in the list of risk-prone sites there is a mix of two contrasting situations. Some sites have been completely engulfed by urban sprawl, as in the case of Kordin III and the Tarxien Temples, whereas others are left secluded because of farmers who determinedly defend their property or adjacent property. Human migration and occupancy are high on the list as main causes of damage. The socio-political dimension has also contributed considerably to the lack of protection of these sites in the last decades. The political decisions – supposedly geared towards public interest – were never directed into conservation for posterity. Education has generally failed to breed a 'culture conscious' citizen. The regular tipping of garbage at San Pawl Milqi complex confirms the lack of interest and of national pride. In the archaeological arena, the world lately witnessed the worst-case scenario where social conflict led to terrorism at Mnajdra. The temples suffered severe consequences that are irreversible. The damage at Mnajdra shows lack of conflict management in an area that throughout history has been mismanaged. The area was fragmented into zones for uses that are in direct conflict with the conservation of the asset, including: quarrying, bird-trapping, agriculture and a commercial outlet. This is a confirmation of the prevalence of short-term views and lack of political commitment to strategically protect the site.

Coastal tower (c. 1658/59), damaged by natural processes



Fort Ricasoli (1670-1900), severely damaged magazines





Ggantija Temples (Neolithic), structural instability and collapsing in parts

## Development-Related Risks

Land-use issues also score high in the list of negative effects and the depletion of sites. Most of the sites have either been encroached by extensive development projects or engineering works, engulfed by urban development or restricted or constricted by agricultural use. The latter, although the least intensive, is still damaging: Ta' Gawhar and It-Torrijiet towers are typical examples. The worst cases, however, are at:

1. Mnajdra – where the archaeological landscape has been marred by two extensive quarries.
2. Tarxien Temples and Ghajn Dwieli tombs have been encroached by housing development in the post-war period.
3. Kordin III is now secluded and limited by a school, a church on either side, and an ever-expanding industrial estate.
4. The paleo-Christian hypogea at Tal-Bistra have been surrounded in the past two decades by a villa complex. One of the villas cuts through the complex, partially compromising the site.

However, the economic pressure that the Island faced in the post-Independence epoch to sustain the building industry is only partial. The tourism industry also had an impact, especially on the most significant sites. Visitor activity at Tarxien, Mnajdra and Ggantija, which take the bulk of local tourism, is unmanaged. Visitor access is uncontrolled and the assets have been eroded with a resulting physical abuse and mass consumption. Moreover, the exploitation of these sites is so intense that the entrance fees are not significant or sufficient to make up for maintenance programmes, rehabilitation and restoration plans.

## Compromised Values

The huge impact on these sites has resulted in a depletion of the effective values of the site, in terms of both the use and non-use values. With regard to non-use values, all sites have been compromised at varying degrees in their aesthetic and cultural composition. All the sites have lost aesthetic significance because of natural and human-induced erosion; however, some cases are more serious than others. The compromised landscape or context could have been avoided if the appropriate political decisions had been taken. Heritage value could have been exploited for long-term projects in the tourist sector and tied into academic and educational activity. The universal importance of the megalithic sites should have been carefully tackled, but land-use mismanagement opted for intensive industry related to mineral extraction. Other sites succumbed to extensive social housing projects that were high on the political agenda, but did not channel the resources for social welfare in the right dimension. The population would have gained more from significant educational and cultural programmes tied to local culture, than with property or social house ownership. As a result, the extensive building programmes of the 1960s boom-period and the following decades have significantly depleted archaeological assets. This has also had a long term effect on the tourism industry, which is only now changing in culture from one based on sun, sea and sand to one with a heritage orientation. Unfortunately, this comes too late for certain sites that have lost both their heritage potential and their market value.

## Architectural Properties

The twelve candidate architectural sites chosen are a cross-section of the various types: military, industrial, maritime and rural. The selected sites also include an aqueduct from the period of the Order, which is a hydraulic engineering asset. The two most extensive assets are the Harbour Fortifications and the Victoria Lines, both military ensembles of great relevance. The former has been submitted for listing as a World Heritage Site.

SITE NAME	GRADE	RISK FACTOR
1 Australia Hall	2	LEVEL 5
2 Fort Ricasoli	1	LEVEL 4
3 Garrison Church	1 (not scheduled)	LEVEL 5
4 Casa Ippolito	1	LEVEL 4
5 Scamp's Palace	1 (not scheduled)	LEVEL 4
6 Umberto Colosso	2 (not scheduled)	LEVEL 4
7 Victoria Lines	1	LEVEL 4
8 Vilhena Palace	1	LEVEL 3
9 Torri Ta' Triq Il-Wieghsa	1	LEVEL 4
10 Wignacourt Aqueduct	1	LEVEL 4
11 St. Anthony's Battery	1	LEVEL 4
12 Harbour Fortifications	1 (tentative list WH)	LEVEL 5

With regard to grading and protection, ten sites are of Grade 1 importance and two are Grade 2 properties.<sup>2</sup> Out of the list, three sites are not yet scheduled but form part of the National Protective Inventory. With regard to risk factors, the sites under study predominantly show a high risk with 67% (8) of the sites at level 4, 25% (3) of the sites are at level 5 and only one is at level 3.

## Maintenance Deficiency

Generally this is the section where the assets were worse off. Most of the buildings were left to deteriorate for decades and were completely abandoned. Therefore, the effects from natural processes were drastic – most assets have structural or aesthetic problems that are irreversible. Some sites are suffering severe structural deficiencies through natural deterioration, including: Fort Ricasoli, parts of the Harbour Fortifications, Vilhena Palace and Wignacourt Aqueduct. Fort Ricasoli and Torri at Triq il-Wieghsa, being both coastal and in contact with the sea, have suffered great damage from sea and wave action. In Fort Ricasoli, No. 3 Curtain was destroyed. The ditch and the landward section of the fort are overgrown by a thick Mediterranean maquis. At the coastal tower known as Ta' Triq il-Wieghsa, the lower corners have collapsed because the rock platform on which it rests succumbed to wave action. Although the impact from pollution was not monitored at the site, there has generally been a drastic impact in the last decade because of the traffic congestion on the island.

## Insufficient Conservation Standards

This is the second section that was also found to be deficient. The safety net was not effective, mainly because of a defective policy and legislative and administrative problems. The survey recorded a mismanagement of assets, lack of monitoring, interventionism and the misuse or disuse of conservation ethics. Although the protection framework had been set-up and was working as scheduled,

problems emerged with applying and enforcing conservation parameters. It was noticed that although the context and landscape were protected with significant buffers, management plans or policies were lacking. This possibly arose as a result of flaws in networking and integrated heritage management. The other element that is even more alarming is that of conservation 'mercenaries' and a neglect of ethics. These are unfortunately difficult to control.

There have been recent debates on the type of rehabilitation and restoration standards involving the Garrison church, Scamp's Palace and St James Cavalier (an element in the Harbour Fortifications ensemble) where redevelopment projects severely jeopardised the fabric of the properties. Therefore, an assessment of conservation standards reveals that although professionals in the field of conservation are on the increase, there seems to be a lack of networking between entities, even though this has significantly improved in the recent years. Another problem is the lack of specialised labour in the field of conservation. It is hoped that the new structures set up at the Restoration Centre in Bighi and the Restoration Unit at the Works Department will train and accredit staff who will fill this gap. The protection framework has to a certain extent been passively imposed over the last decade through the assignation of protection areas. Active restoration of the scheduled properties is recent, with the Planning Authority issuing three Conservation Orders on scheduled buildings and sites in the last two years: the Citadel (Gozo), the Buskett Gardens and Villa Alhambra. Significant work has been commissioned by the Valletta, Cottonera and Mdina Rehabilitation Projects. The newly established Restoration Unit is tackling the fortifications and government owned properties.

## Risks from Social and Collective Behaviour

The socio-political dimension was also a factor that put certain sites at risk. Poor political decisions in the past have put at risk the management of government-owned estates because of incorrect use and brutal adaptations. Public interests were to a great extent neglected and the decisions on land-use were based on short-term considerations. This is an unfortunate scenario, where forts were leased as farms for 99 years. Both the Victoria Lines and the Harbour Fortifications system suffered because of this regime. Other abuse and crime is connected with vandalism. Australia Hall is a case in point where suspected arson has completely destroyed the timber roofing of the building, which was a unique example of building technology imported during British colonial times. Apart from the mismanagement of estates, the social dimension is also problematic with no significant development of national pride or a connection to local heritage. This could be the result of two elements: a relatively recent Independence; or a very high number of heritage assets were built during the various periods of colonisation and therefore have not engendered a sense of belonging.

## Development-Related Risks

This risk factor was connected to economic and land-use issues. The effect on context through new construction or of environmental impact through urban transformation and encroachments is most evident. The Victoria Lines, the Harbour Fortifications and the Wignacourt aqueduct suffered from segmentation as a result of extensive building or infrastructural development (building of hotels or roads in close proximity or over the site). In the former example, the Area of High Landscape Value, although still significant is marred by quarrying activity. It must be said that quarrying

had occurred prior to the scheduling of the sites and bond funds tied to developmental infringements are now being used for restoration projects. Another negative effect arises from unmanaged tourism or visitor impact on sites. Because tourism and access is usual uncontrolled, there is an accelerated physical erosion of assets without the necessary generation of funds for restoration, upkeep and maintenance.

## Compromised Values

The survey also assessed how non-use and use values have been affected by negative and adverse impacts. At all the sites the cultural and aesthetic values of assets are either vulnerable or partially compromised by intrusive works. The values at Scamp's Palace were completely compromised in terms of the complex in general, detail and context. A wing of the palace was rebuilt in concrete brick without any connection to the ensemble, grit-blasting was used internally, significant parts and elements were removed from the building and an extensive attic compromising the Vittoriosa townscape was added to the building. Although not all sites were monitored vis-a-vis the intangible heritage aspects, some new uses have indeed compromised the legibility of the properties and their character: this was perceived in the conversion of Scamp's Palace into a casino and of the garrison church, first, to a main post office and then to a stock-exchange. The Umberto Colosso complex also lost its industrial dimension, as for a time it was used as a technical school and is now partially abandoned. Use values such as resource and property/market value in general have suffered because of erosion of the asset and the possibility to re-present for tourism purposes can be difficult. The properties have also been negatively affected because of their dilapidated state. The lack of knowledge and experience in marketing heritage assets is evident in the uninspiring possibilities presented in the exploitation and use of such sites. One cause may be that local market forces concentrate on hotel-building and new development, rather than a thorough assessment of extant resources. In addition, a tourist industry based on the sun, sea and sand culture of the post-colonial days has had a negative impact. For years the tourist potential of heritage has been neglected, misunderstood and underestimated.

## Urban Conservation Areas

The Planning Authority recently commissioned a pilot survey for the Structure Plan Review of policies related to urban conservation. The survey studied three urban conservation areas, and revealed that the urban fabric is at risk from various threats.

The survey of the three urban conservation areas included an assessment of:

- population
- vacant dwellings
- type of assets
- commercial distribution
- visitor impact
- quality of fabric.

## Social and Collective Behaviour

The impacts from human migration and occupancy are considerable on urban conservation areas. During the past three decades there has been marked urban sprawl, with local populations mov-

ing from the cores to new housing estates or to new extensions outside the villages (filling-in schemed areas). The population in the urban or village cores of the Maltese Islands has been undergoing significant and consecutive drops in levels. Vacant dwellings constitute a major threat to Urban Conservation Areas in all Local Plan Areas. Although population densities are relatively high, Mdina the old capital has 8% vacant dwellings (equal to the national average), whereas Pieta' and Safi are below the average with 1%. The worst scenario is found at Valletta and statistics show that the tendency is worsening.

UCA name	Population	Vacant Dwellings	% Vacant
Mdina	235	9	8
Safi	410	14	7
Pieta'	981	37	7
Valletta	6,787	309	9

## Insufficient Conservation Standards and Development Pressure

It is only recently that the UCA/village cores of Mdina, Safi and Pieta' have been surveyed and monitored completely. The project (1998-2000) included the compilation of a heritage system for all the cores. There is, therefore, a mechanism in place for the protection of properties. However, only in Mdina is there an active and on-going restoration-rehabilitation project. The Mdina Rehabilitation Committee has been at work on the development of a Master Plan and the Restoration Unit is concentrating on the Vilhena Palace area, which is in a most critical state. The Planning Authority has published the Local Plan for Mdina, which is based on a Character Appraisal and Conservation Area Strategy and Guidelines. Even though the conservation and protection parameters for Mdina have been set-up, until recently infringements and illegal interventions have been recorded. Enforcement and monitoring still remain problematic. Comparatively, out of the three, Mdina has been subjected to the worst abuse and damage to fabric. The damage has been both disastrous and extensive.

The hacking of façades is one of the most pressing problems. Apart from weathering and dampness, which are natural causes of deterioration and which are significantly present in most buildings, the worst and most adverse deterioration has been caused by insensitive scraping, hacking, re-pointing and cladding. Some hacking has been so damaging that more than 5 centimetres of extant stonework have been destroyed. In some parts, details and architectural elements have disappeared altogether. Other interventions include removal of existing plastering over mediaeval rubble walling, plastering and cladding or re-pointing with cement. The following is a list of graded deterioration following insensitive intervention:

- X1 Scraping off patina and mild hacking.
- X2 Scraping off patina, mild hacking and removal of extant pointing.
- X3 Scraping off patina, heavy hacking, removal of extant pointing and masonry.
- X4 Scraping off patina, heavy hacking, removal of extant pointing and masonry and re-pointing with cement grey or coloured (plastered or cladded facade).
- X5 Scraping off patina and heavy hacking, removal of extant pointing and masonry and re-pointing with cement grey or coloured. Complete disfigurement of architectural elements and decoration.

The results show patterns of intense intervention in the residential quarter. A continuous stretch of Triq Inguanez has been severely damaged. Of all the listed and scheduled assets, the highest percentage is at X2 (9%) and the lowest at X1 and X5 (4%). Two palazzi have been severely mutilated, affecting significant areas of the town. The highest percentage of substantially damaged assets is within the X2–X4 band. Therefore, when taking these results into consideration, the damage is both extensive and intensive. Unfortunately this sort of intervention is fashionable. Hacking of town houses and palazzi to obtain a so-called ‘rustic look’ is widespread. This is, however, an imported idea and not historically accurate. Traditionally, in fact, rural buildings usually had smooth and well-dressed ashlar walls.

The survey also showed that the more economically affluent areas – such as Mdina – seem to have suffered more damage due to unguided and overzealous renovations, followed by Pietà and Safi. Safi, characterised by a less vibrant economy, seems to have retained the original fabric, complemented by the ‘intangible heritage’ of social fabric.

### Architectural elements

Vacant dwellings and deficiencies in the protection network also affected architectural elements in conservation areas and scheduled buildings. In the last two decades, the introduction of aluminium as a timber substitute put much pressure on the timber balcony – a typical and characteristic architectural element in the local vernacular. The change of timber balconies to aluminium ones in Urban Conservation Areas has been widespread. The effects have been tremendous on the aesthetic values of the buildings and also the values connected to context and townscape. The negative visual impact of this phenomenon has raised much criticism. Although aluminium balconies are illegal, the activity persists. The initiatives taken by the Planning Authority in this regard have, to a certain extent, revived a trade that had been nearly lost. During the past 5–6 years, a timber balcony scheme was launched covering the Cottonera area. Now it is also being applied to Valletta as a joint venture with the Valletta Rehabilitation Project. The grant scheme covers the carpenters and small and medium enterprises involved in the fabrication of timber balconies, the numbers of which have mushroomed in the recent years.

Other elements, especially parts of vernacular rural buildings, are also at risk. The pillaging of timber rafters, typical roofing cor-

bels (kileb), and roofing (slabs) is a recent phenomenon. These are usually re-utilised in other so-called ‘rustic’ renovations or as features in modern buildings. Stone artefacts in public places are also at risk and it seems that there is a local black market concentrated on religious stone statues, niches, stone markers, stone balconies and interesting architectural elements. The worst recorded cases include the complete dismantling of a stone balcony in Gozo and a unique 17th-century cross in Tarxien. Investigations to date have not led to the retrieval of the stolen artefacts. The new Heritage Bill has a section dedicated to stolen heritage property, including penalties. Hopefully this will act as a deterrent and will also control the exportation of local artefacts, which have unique values arising from their limited quantities and their expression of the local vernacular in style and fabrication.

An architectural element that is at the level of extreme risk is the ‘*muxrabija*’, which is nearing extinction. This Islamic-type window, usually found in mediaeval and rural buildings, requires immediate recording and listing. The window style is highly valued because of its aesthetic, cultural and historic elements and it has become a rare feature. The conservation of the remaining few is sought for two reasons:

1. the lack of data available on Mediaeval structures because of their rarity – therefore, the feature is important for academic and educational purposes;
2. strengthening of the historical connection with the roots of Islamic culture and early architecture in the Maltese Islands.

### Networking the Cultural Heritage Sector

Integrated conservation is about sharing resources. Although the current legislative framework may have anachronisms and incongruence, it is not the major problem facing heritage conservation and protection. The problem lies in the lack of funds, communication skills and empire-building notions. This situation has been delineated clearly in the Council of Europe survey, which states that ‘joint action by the monuments department and the planning authorities is neither sufficient nor satisfactory’. A more coercive atmosphere is solicited whereby tools, mechanisms, policies and human resources are shared. Therefore, it is best to delineate the resources available and propose solutions. This exercise has already been undertaken through the Council of Europe survey



Mnajdra Temples (Neolithic), recently damaged by acts of vandalism

quoted above. It is not the best guideline because it lacks certain detail; however, it is still a very good document and suggests and lists priorities:

1. renewal of existing heritage protection legislation
2. increased penalties for infringements of the law
3. increased funding of heritage
4. more effective action to develop public awareness
5. closer co-operation between ministries and departments responsible for the architectural heritage.

Throughout this year matters have been developing quickly and the proposed new structures and new legislative and administrative mechanisms will hopefully give positive results.

#### ICOMOS Malta

<sup>1</sup> POLICY ARC 2: In making the designations referred to in Policy ARC 1, the Planning Authority will give protection ratings as appropriate to local circumstances as follows:

- Class A: Top priority conservation. No development to be allowed which would adversely affect the natural setting of these monuments or sites. A minimum buffer zone of at least 100 metres around the periphery of the site will be established in which no development will be allowed.

- Class B: Very important to be preserved at all costs. Adequate measures to be taken to preclude any damage from immediate development.
- Class C: Every effort must be made for preservation, but may be covered up after proper investigation, documentation and cataloguing. Provision for subsequent access shall be provided.
- Class D: Belonging to a type known from numerous other examples. To be properly recorded and catalogued before covering or destroying.

<sup>2</sup> POLICY UCO 7: Listed buildings in Urban Conservation Areas will be graded as Grades 1, 2, or 3 as follows:

- Grade 1: Buildings of outstanding architectural or historical interest that shall be preserved in their entirety. Demolition or alterations which impair the setting or change the external or internal appearance, including anything contained within the curtilage of the building, will not be allowed. Any interventions allowed must be directed to their scientific restoration and rehabilitation. Internal structural alterations will only be allowed in exceptional circumstances where this is paramount for reasons of keeping the building in active use.
- Grade 2: Buildings of some architectural or historical interest or which contribute to the visual image of an Urban Conservation Area. Permission to demolish such buildings will not normally be given. Alterations to the interior will be allowed if proposed to be carried out sensitively and causing the least detriment to the character and architectural homogeneity of the building.
- Grade 3: Buildings which have no historical importance and are of relatively minor architectural interest. Demolition may be permitted provided the replacement building is in harmony with its surroundings.