

# FEEDBACK BY THE MALTA CHAMBER

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## Management Plan for Valletta UNESCO World Heritage Site

**Presented to:** Ministry for the National Heritage, The Arts and Local Government

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**Classification:** Confidential

## INTRODUCTION

The Malta Chamber of Commerce, Enterprise and Industry notes the launch of the [Public Consultation for the UNESCO Valletta World Heritage Site Management Plan 2023](#), led by the Ministry for the National Heritage, The Arts, and Local Government, recognizing it as a possible positive stride forward. Its success will depend on its timely implementation which must also be properly coordinated, properly supervised and properly maintained.

Our recommendations for the Valletta Management Plan are designed not only to preserve the city's historical identity but also to stimulate economic growth, foster community development and, predominately, enhance Valletta's identity as a quality destination. To achieve these multifaceted aspirations, The Malta Chamber has delineated three paramount priorities:

- (i) Cultivating Valletta as a dynamic city grounded in its invaluable heritage and cultural legacy,
- (ii) Vigilantly safeguarding and perpetuating the environmental integrity of Valletta, and
- (iii) Paving the way for Valletta to be easily accessible and technologically adept, thereby embracing a future that is both digitally fluent and seamlessly connected.

In November 2021, The Malta Chamber published "[Rediscover](#)," a comprehensive initiative focusing exclusively on the tourism industry – it embraces a holistic perspective, with a paramount focus on sustainability. We firmly emphasize the necessity of sustained economic development for enduring positive outcomes. This visionary outlook positions Malta as a year-round destination, strategically addressing seasonality challenges. Our primary goal is to establish Malta as a recognized quality destination, emphasizing every facet of the supply chain, attracting tourists whose contributions significantly bolster the economy.

A pivotal recommendation within the document advocates for the implementation of a dedicated marketing strategy for Valletta, positioning it as a distinctive destination renowned for its rich culture and heritage. Furthermore, specific recommendations tailored for Valletta include:

1. Expanding the operating hours of key attractions like St. John's Co-Cathedral and other museums in Valletta, particularly during peak summer months, while facilitating online pre-

bookings. These measures are designed to streamline tourist traffic, reduce queues, and enhance the overall visitor experience.

2. Intensifying efforts in the regeneration of Valletta and its inner harbour area.

## **VALLETTA AT THE CENTRE OF TOURISM IN MALTA**

As the Valletta Management Plan states accordingly, “in 2019 tourist visits to Valletta reached a quantitative record in terms of the amount of visitors, the length of their stay and spending. The figures for 2023 go.”

The Malta Chamber stresses that while the number of inbound tourists has surpassed the three million mark, marking an 8.3% increase over 2019 figures. However, despite this uptick in tourist arrivals, the real expenditure per tourist, adjusted for inflation, has decreased by 2.3% compared to 2019. This phenomenon can be attributed to the fact that although the number of tourists has risen, the increase in their real spending hasn't matched the growth rate of tourist arrivals. Specifically, while the number of tourists increased by 8.3% over 2019, the rise in real expenditure by tourists only amounted to 5.7% over the same period. Consequently, while more visitors have come, the proportionate increase in their spending has lagged, resulting in a slight decline in the average spending per tourist.<sup>1</sup>

In the realm of tourism, a capital city serves as the embodiment of a nation's identity, culture, and history. The creation of a robust and vibrant tourism ecosystem is vital for sustainable growth in this crucial sector. Various stakeholders, including residents, non-residents, office workers, day visitors, boutique hotels, hotels, and short-term rentals, collectively shape the tourism landscape of a capital city.

An effective tourism ecosystem operates like a symphony, where each stakeholder plays a unique yet harmonious role in crafting a memorable experience for visitors. Residents contribute to the authenticity of the destination, forming the foundation of a warm and welcoming atmosphere. Non-residents bring diversity and cultural exchange; and, office workers act as ambassadors, showcasing the city's appeal to colleagues and potential investors. The city's accessibility through the bus terminal, cruises, and excursions enhances its allure. Various accommodations, from boutique hotels to short-term rentals, cater to diverse preferences, making the city appealing to a wide range of tourists. Preserving cultural heritage is integral, with feasts, festivals, and events showcasing the city's

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<sup>1</sup> [https://maltabusinessweekly.com/growth-pains/25111/?fbclid=IwAR1gVBYvO\\_r4erz-MTch6WRtLH10QHel2cB9iKAiujhvv-NsrjA-FaWjs](https://maltabusinessweekly.com/growth-pains/25111/?fbclid=IwAR1gVBYvO_r4erz-MTch6WRtLH10QHel2cB9iKAiujhvv-NsrjA-FaWjs)

traditions. Museums, restaurants, and bars offer immersive experiences. Hawkers contribute to the local economy and showcase craftsmanship.

OFFICE WORKERS	THREE CITIES	DAY VISITORS	CLEANSING	RESIDENTS	AESTHETICS	SHORT-TERM RENTALS
RETAIL SHOPS	CRUISES	BARS	GRAND HARBOUR	MUSEUMS	PLANNING	HOTELS

## E C O S Y S T E M

BUS TERMINAL	FEASTS & CHURCHES	GUIDES	BOUTIQUE HOTELS	ENFORCEMENT	NON-RESIDENTS	FESTIVALS & EVENTS
PEDESTRIANISATION	SAFETY	FLORIANA	HAWKERS	ACCESSIBILITY	RESTAURANTS	EXCURSIONS

The interdependence of stakeholders is evident, requiring effective planning by local authorities to ensure sustainable growth while preserving aesthetics and safety and this collaborative effort creates a virtuous cycle, where tourism supports local livelihoods and stimulates economic growth.

This collaborative effort, outlined in subsequent recommendations, seeks to create a virtuous cycle where tourism not only supports local livelihoods but also serves as a catalyst for continued economic prosperity in harmony with the cultural and historical essence of Valletta.

## RECOMMENDATIONS

### INCREASING CREDIBILITY THROUGH ENFORCEMENT AND REGULATIONS

The Malta Chamber contends that the absence of robust enforcement stands as the stumbling block preventing Malta from attaining status as a premium destination. Within the Valletta Management Plan, **there is a notable gap regarding the specifics of enforcement mechanisms.**

Effective governance demands seamless coordination and alignment among government entities, especially in areas concerning enforcement, regulations, parking permits, and noise control. Fragmentation within these spheres can lead to inconsistencies, loopholes, and inefficiencies, undermining the intended goals of policies and compromising public welfare. Ensuring cohesive collaboration among Government entities not only enhances the efficacy of enforcement mechanisms but also fosters a harmonized regulatory environment that promotes fairness, transparency, and civic trust. By streamlining processes and unifying approaches across departments, governments can better address community needs, optimize resource allocation, and uphold standards of accountability, ultimately fostering a more resilient and responsive governance framework.

In light of this, The Malta Chamber proposes the below recommendations:

1. **Proper enforcement of laws and regulations:** Proactive, co-ordinated and unselective enforcement at all levels.
2. **Navigating regulatory overlap:** Existing regulations are overlapping, posing challenges for stakeholders to comply and authorities to enforce. The government should identify conflicting regulations and strive to resolve discrepancies.
3. **General enforcement:** Establish a dedicated enforcement team responsible for regularly reviewing and updating the site's management plan. This team should conduct periodic evaluations to assess the condition of the site, ensuring it adheres to the latest conservation practices and international standards.
4. **Enforcement protocols:** Implement stringent enforcement protocols to oversee the comprehensive conservation programs. This includes monitoring structural stability, architectural authenticity, and material preservation.
5. **Preserving Heritage:** Enforce strict guidelines for any new constructions or renovations within the site, ensuring they align with historical and aesthetic preservation goals.

6. **Integrating enforcement training modules for capacity building:** Integrate enforcement training modules into the capacity-building programs. This ensures that local authorities, site managers, and stakeholders are equipped with the necessary skills to enforce and monitor adherence to conservation and sustainable development guidelines.
7. **Expanding pedestrian zones:** Prioritizing pedestrian zones fosters vibrant spaces, enhancing resident and visitor well-being and safety. Expanding pedestrian areas promotes active lifestyles, social interaction, and mitigates traffic congestion and pollution.
8. **Maintaining pedestrian zones:** To maintain these zones effectively, it is crucial for city planners to invest in infrastructure such as pedestrian-friendly pathways, seating areas, and green spaces, while also implementing measures to regulate vehicle access and enforce pedestrian rights-of-way. Through proactive urban design and ongoing maintenance efforts, cities can create welcoming and sustainable environments that prioritize the needs and experiences of pedestrians, contributing to the overall liveability and attractiveness of the city core.

#### **CRAFTING A GREENER TOMORROW**

9. **Collaborative waste management plan:** Engage in consultations with stakeholders to develop an effective waste management plan that not only functions efficiently but also guarantee adherence and compliance. This plan should include both residential waste and commercial waste.
10. **Addressing Drainage Issues in the Valletta Region:** Drainage problems have been consistently observed in the Valletta region, leading to multiple reported incidents of visible drainage issues. These problems have extended to causing damage to significant sites such as the Valletta bastions. It is imperative for the Water Services Cooperation to diligently monitor the situation and take appropriate action to address these concerns promptly.
11. **Plan for the Upkeep and Maintenance of Public Areas:** Public areas are vital for economic growth, tourism, community well-being, accessibility, cultural preservation, crime deterrence and overall quality of life. Clean, well-maintained spaces promote boost local commerce, encourage more social interaction and ensure accessibility for all ages and abilities. Additionally, well-maintained public areas tend to have lower crime rates as they are more likely to be actively used and monitored. A plan is required for the systematic and regular proper maintenance and cleansing of public areas. Furthermore, we propose that the cleansing and maintenance fall under the same department.
12. **Increasing energy performance in scheduled properties:** Tailormade fiscal incentives for private owners of scheduled properties which go beyond the current limits of “Irrestawra Darek” to help

them in the upkeep and maintenance of these buildings based on a clear set of criteria which also take into account the transition to more energy efficiency to the extent possible.

## CONSERVING VALLETTA'S HERITAGE

Malta's distinctiveness and allure are rapidly diminishing due to the absence of adequate guidelines safeguarding our cultural, historical heritage, and natural landscape. Urgently required are national policies on architecture, aesthetics, and landscape, aligning development with our cultural identity, history, and natural environment. Implementing these policies will not only preserve our heritage but also streamline the assessment of planning proposals, ensuring greater coherence in decision-making processes.

Valletta's distinctive silhouette is shaped by a combination of private and public interests including property owners. It is crucial that these interests not only align but also collaborate harmoniously to achieve the optimal enhancement of the city's infrastructure.

In light of this, The Malta Chamber puts forth the following recommendations with the objective of channelling investment within the city back into its own development. These proposals include:

13. **Re-investing VAT:** Direct the VAT collected in the Valletta area towards local investments, with transparent sharing of data to instil a positive perception among the public.
14. **Incentivising property investors for cultural conservation:** Advocate for fiscal incentives for current property investors in Valletta, encouraging them to maintain their properties in adherence to cultural and historical specifications outlined by the Authority.
15. **Repurposing depleted buildings for modern utility:** Encourage the government to identify historical buildings lying dormant and grant concessions through a transparent tendering process to the private sector at advantageous rates. The aim is to repurpose these structures for contemporary use while safeguarding their historical integrity.
16. **Sustaining architectural heritage and their surroundings:** Stress the importance of regular cleaning and maintenance for all buildings, ensuring they remain in a state of good repair. This proactive approach prevents deterioration and contributes to the overall preservation of the city's architectural heritage and their surrounding neighbourhood.
17. **Enhancing public spaces for all stakeholders:** Further to point 15, an emphasis on the need to elevate the quality of urban spaces to meet high standards suitable for residents, non-residents,

and tourists alike. This includes strategic improvements to enhance the aesthetic appeal and functionality of public areas including pavements.

## ENHANCING VALLETTA AS A QUALITY DESTINATION

As previously emphasized, The Malta Chamber has continuously advocated for the adoption of a robust marketing strategy, recognizing that a comprehensive approach is essential for positioning Valletta as a destination renowned for its rich cultural heritage. It is imperative to underscore that without the implementation of the recommendations we are putting forward, a truly effective marketing strategy for Valletta cannot be achieved. In addition to the points raised above:

Aligned with this overarching goal, we put forth the following refined recommendations:

18. **Increasing the use of digital tools:** Leverage technology to develop virtual tours of Valletta's heritage sites. This initiative could include 360-degree virtual experiences, interactive maps, and online platforms to make Valletta's cultural richness accessible to a global audience.
19. **Showcasing local talent:** Organize annual or bi-annual cultural heritage festivals that showcase Valletta's history, arts, and traditions. These events could feature performances, exhibitions, and workshops, drawing both locals and international visitors.
20. **Engaging audiences with vibrant campaigns:** Launch dynamic and engaging social media campaigns across platforms like Instagram, Facebook, and Twitter. Regularly share visually appealing content, historical anecdotes, and updates on ongoing conservation efforts to captivate a wider audience.
21. **Narrating historical events:** Create an online platform or podcast series that narrates captivating stories about Valletta's cultural heritage. Invite historians, locals, and experts to share their perspectives, creating a digital library of Valletta's rich history.
22. **Expanding the Valletta neighbourhood:** Floriana and the Grand Harbour area constitute integral facets of Valletta's identity and thus warrant equal elevation alongside the city itself. Therefore, all our recommendations should be extended to encompass these areas for comprehensive implementation, whilst ensuring that their own identity is kept.



## Conclusion

The Malta Chamber underscores the critical need to bolster Valletta's credibility as a premium destination through robust enforcement measures. The Valletta Management Plan, while comprehensive, highlights a significant gap in the delineation of specific enforcement mechanisms. To address this, we propose a multifaceted approach aimed at enhancing enforcement efficacy.

The establishment of a dedicated enforcement plan is imperative for regular reviews and updates to the site's management plan. It is imperative to conduct thorough evaluations, ensuring the site adheres to the latest conservation practices and international standards. Rigorous enforcement protocols must oversee comprehensive conservation programs, with strict guidelines for new constructions or renovations aligning with historical and aesthetic preservation goals.

Simultaneously, as Valletta's heritage stands at the nexus of private and public interests, we advocate for strategic investments directed towards its conservation and development. Proposals include redirecting VAT collected in the Valletta area towards local investments, fiscal incentives for property investors adhering to cultural specifications, and repurposing dormant historical buildings through transparent tendering.

The effort to position Valletta as a quality destination is equally vital, with a focus on leveraging technology for virtual tours, organizing cultural heritage festivals, and launching engaging social media campaigns. The creation of an online platform or podcast series enriches the narrative of Valletta's cultural heritage, fostering a global audience's appreciation.

In tandem, these recommendations form a comprehensive strategy for the sustained conservation of Valletta's heritage, enforcement of cultural preservation measures, and the dynamic promotion of Valletta as an unparalleled destination. As we navigate the path forward, the synergy between enforcement, conservation, and marketing endeavours will fortify Valletta's standing as a beacon of cultural richness and a quality destination on the global stage.



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