

The City of Valletta:

Why the Proposed UNESCO Buffer Zone Must Be Revised

Introduction

Valletta's status as a UNESCO World Heritage Site is based on its Outstanding Universal Value (OUV), which includes not only its architecture, fortifications, and urban fabric, but also the unique visual relationship between the city and its surrounding harbours.

The Government's proposed buffer zone for Valletta is intended to protect this heritage. However, FAA's analysis concludes that the proposed buffer zone is inadequate and does not provide sufficient protection for Valletta's skyline, viewsheds, historic setting, or visual integrity.

A buffer zone should protect not only the physical heritage site itself but also the wider landscape and views that contribute to its significance. The current proposal falls short of international best practice and risks allowing further degradation of one of Malta's most important heritage assets.

Key Concerns

1. The Buffer Zone Excludes Critical Views of Valletta

The most significant weakness of the proposed buffer zone is that it largely stops at the water's edge and does not include many of the key viewpoints from which Valletta is experienced.

The iconic views of Valletta from Sliema, Gżira, Ta' Xbiex, Msida, and Pietà are among the most recognised images of the city. Yet these viewpoints fall outside the proposed buffer zone.

As a result, developments that interfere with these views can still be approved despite having a direct impact on the appreciation of Valletta as a World Heritage Site.

2. Valletta's Skyline Is Under Increasing Pressure

The report highlights the cumulative impact of high rise developments around Marsamxett Harbour and beyond.

Developments such as the ST Tower, 14 East Tower, Metropolis, Mercury Tower, and other approved projects are progressively altering the visual setting of Valletta.

The current analysis fails to adequately assess the impact of these developments on Valletta's skyline when viewed from the Grand Harbour and Marsamxett Harbour. Once damaged, these views cannot be restored.

3. Existing Developments Already Demonstrate Weakness of Buffer Zone

Several projects illustrate how vulnerable Valletta's views have become:

- The Manta Lido at Tigné obstructs important views towards Valletta.
- The AquaLuna Lido in Gżira interrupts harbour views despite assurances that it would remain visually permeable.

- The Capitanerie development threatened important views from the Gżira and Ta' Xbiex waterfront.
- Proposed Manoel Island developments would significantly alter views of Valletta from the Marsamxett coastline.

These cases show that the proposed buffer zone does not adequately protect Valletta's setting from inappropriate development.

4. Historic Fortifications and Coastal Areas Are Insufficiently Protected

Valletta was designed as a fortified city and its surrounding defensive structures form an integral part of its heritage significance.

The proposed buffer zone does not adequately protect:

- The Marsamxett coastline
 - Fort Manoel
 - Fort Tigné
 - Il-Fortizza
 - Fort St Elmo
 - Other strategic viewpoints linked to Valletta's military history
- These sites are part of the wider historic landscape that contributes to Valletta's identity and should be included within a strengthened buffer zone.

5. Increasing Commercialisation Is Degrading Valletta's Setting

The report also highlights the gradual loss of visual quality along the waterfronts facing Valletta.

Permanent catering structures, kiosks, ticket booths, enclosed terraces, and commercial installations increasingly obstruct public views and contribute to visual clutter.

While individually these structures may appear minor, collectively they are transforming the waterfront into a heavily commercialised environment that detracts from Valletta's historic character.

6. Lack of Transparency and Public Consultation

FAA is highly concerned by the process used to define the proposed buffer zone.

Key studies, including the underlying viewshed analysis, were not made publicly available despite repeated requests. This limited meaningful public participation and made independent assessment difficult.

We maintain that a World Heritage Site of Valletta's importance requires a transparent, evidence-based approach involving public consultation and independent scrutiny.

International Comparisons

Comparable UNESCO sites demonstrate a more comprehensive approach to buffer zones; the example of Ortygia in Syracuse, Sicily stands out. Like Valletta, Ortygia is a fortified historic city surrounded by water. Its buffer zone extends beyond the historic core and includes the surrounding waterfronts and viewpoints from which the city is experienced.

International examples consistently show that successful buffer zones protect not only the heritage site itself but also the wider landscape, skyline, and viewshed.

Recommendations

FAA recommends that the proposed Valletta buffer zone be revised to provide meaningful protection for the city's Outstanding Universal Value.

Key recommendations include:

1. Extend the buffer zone to include the Marsamxett coastline from Tigné to Pietà.
2. Protect significant viewpoints towards Valletta and from Valletta.
3. Strengthen safeguards against intrusive high rise development.
4. Include key fortifications and coastal defence structures within the protected area.
5. Control visual clutter and inappropriate commercial structures along waterfronts.
6. Publish all supporting studies and undertake meaningful public consultation.
7. Develop stronger planning policies specifically designed to protect Valletta's skyline and viewsheds.

Conclusion

Valletta's World Heritage status depends not only on its buildings and fortifications but also on the way the city is seen and experienced within its wider harbour landscape.

The proposed buffer zone does not adequately protect these essential qualities. Without stronger safeguards, further development risks causing irreversible harm to Valletta's visual integrity and Outstanding Universal Value.

FAA therefore calls for a revised buffer zone that reflects international best practice, protects the city's historic setting, and ensures that future generations can continue to experience Valletta as one of the Mediterranean's most remarkable fortified cities.