

Scheduling Heritage in Malta

The Perspective of Heritage Professionals

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Received: 12 December 2022, Accepted: 06 June 2023, Published online: 26 June 2023

Abstract

Scheduling is a cultural heritage tool to provide statutory protection to heritage assets. This article is an analysis of the process of securing protection of immovable cultural heritage buildings and sites in the Maltese Islands. Through qualitative interviews with key stakeholders – namely, heritage professionals – this study exposes shortcomings and limitations of the existing local scheduling process. It proposes the public as a main stakeholder and lists several recommendations put forward by the participants for a more inclusive methodology of selecting and scheduling cultural heritage buildings and sites. It concludes by proposing the adoption of modes of rendering the process and assessment of heritage assets less subjective, notably through the adoption of the prototype computation of heritage values based on a heritage value grid.

Keywords

scheduling, listing, heritage values, urban conservation, Malta

1 Introduction

Conservation is constantly reevaluating itself in relation to societal changes. It acknowledges its role in perpetuating cultural values, as well as the need for broader discussions outside the profession itself. Comprehensive studies which focused on key research values were undertaken by de la Torre (2013), Doğan (2020), Chen and Li (2021), Mason (2002), Olukoya (2021) and Yung and Chan (2013). Recent unveilings of fallacies and contradictions in some of the basic principles of conservation, together with conflicting value systems and the literary criticism of scholars representing minorities, bring to light the challenges that the field faces as notions of cultural values become less standardized and more intertwined with different cultural constructs which change from one context to another (Bracker and Richmond, 2009). An extensive, yet concise policy history of the built heritage in the United Kingdom, spanning from 1882 to 1996, was penned by John Delafons (1997).

Scheduling is a process whereby heritage buildings and sites of national importance are granted legal protection. Historically this process dates from the Ancient

Monuments Protection Act (UK Crown, UK Parliament, 1882), whereby the first schedule of 68 mainly archaeological monuments meriting state protection was compiled, although scheduling as a form of heritage protection commenced in 1913. Nowadays, there are several categories besides prehistoric monuments that are scheduled, including burial sites and historic buildings (Historic Environment Division, 2019). The criteria for scheduling a heritage asset include its documentation, potential, diversity, group value, present condition and state of fragility.

The listing of buildings is a similar process. However, in the UK, only structures above the ground can be listed; as such, scheduling remains the only form of legal protection granted to archaeological sites (Heyworth, 2013). Mike Heyworth, the Director of the Council for British Archaeology, notes that "Unlike Listing, Scheduling is not a statutory process, ie archaeological sites of national importance do not by law have to be Scheduled, and many are instead protected via the planning system and through management agreements" (Heyworth, 2013). While listed buildings are graded, no such system exists for scheduled monuments.

Malta, the smallest EU Member State, is an island state: the most densely populated country in the EU and one of the densest with respect to its cultural heritage. The Maltese Archipelago is a group of islands spread over an area of 316 km² and includes three habitable islands: Malta, Gozo and Comino. It is located 93 km south of Sicily and 288 km north of Libya. Once termed as an archaeological paradise (Bonanno, 1997), Malta has a history of vernacular and urban building traditions (Bianco, 1999; 2016; Bianco and Cardona, 2020; Borg, 2001; De Lucca, 1993; Hughes, 1956; Mahoney, 1988; 1996). The concept of scheduling of heritage buildings was introduced in the Development Planning Act (DPA) (Government of Malta, 1992). This legislation, best analytically studied to date by Aquilina (1999), entrusted the Planning Authority (PA), a nascent organization at the time, to create a schedule of statutory protection to be published in the Malta Government Gazette. Whilst the National Protective Inventory (NPI), overseen by the Superintendence of Cultural Heritage (SCH), is a cultural tool, scheduling is a planning tool. The NPI is a list of sites with heritage value; the process of scheduling provides cultural heritage assets with statutory protection under the law. Unlike the UK, scheduling and listing in the NPI can refer to both heritage buildings and archaeological sites (Attard and Vella, 2014). Furthermore, scheduling follows a grading system in Malta. In terms of the Structure Plan (Government of Malta, Ministry for Development of Infrastructure, Planning Services Division, Colin Buchanan and Partners, Generale Progetti SpA, 1990), which has the force of law through the DPA

(Government of Malta, 1992), buildings of architectural and/or historic importance in urban conservation areas (UCAs) are given a protection grading of 1 to 3 whilst archaeological sites are graded from Class A, B or C through policies UCO 7 and ARC 2, respectively (Table 1). In the three-tier grading system of scheduling, Grade 1 refers to prestigious buildings and has been interpreted to offer very limited allowance for intervention, making such a property "untouchable". Grade 3 sites can be demolished provided the replacement is a better alternative.

Although the Structure Plan was superseded by the Strategic Plan for Environment and Development (SPED) (Malta Environment and Planning Authority, 2015a), article 1.13 of SPED states that the former document's Policy UCO 7 still stands. Based on research undertaken by one of the authors (Zammit, 2022), this study focuses on the scheduling of heritage buildings and attempts to describe the current practice, identify its shortcomings, and put forward recommendations for more inclusive, sensitive and implementable policies, from the perspective of leading heritage professionals in Malta.

2 Materials and methods

A brief review of urban conservation history in Malta is given by Mallia (2014), while a critical overview of the legislative and institutional context for conservation of the built environment in Malta is covered by Chapman (1999). This study is based on qualitative research, specifically, structured interviews with local key policy-makers and/or professionals involved in heritage conservation who are

Table 1 Structure Plan Policies UCO 7 and ARC 2 (Government of Malta, Ministry for Development of Infrastructure, Planning Services Division, Colin Buchanan and Partners, Generale Progetti SpA, 1990:pp.88,102,103)

	Grading	Policy
UCO 7	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 only of relatively minor architectural interest. Demolition may be permitted provided the replacement building is in harmony with its surroundings.
ARC 2	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 m 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.

well versed with the scheduling process in Malta. Their participation was intended to contribute to a better understanding of this process. The aim of the interviews was to provoke opinions, criticism and recommendations about the respective local procedures. Participants were encouraged to elaborate unreservedly on the following set of open-ended questions:

1. In the literature based on the UK, reference is made to "listing" and "scheduling" processes. With respect to Malta, do these terms have the same meaning?
2. What are the procedures and processes adopted in scheduling a heritage building/site in Malta?
3. Which planning policies are related to the scheduling process in Malta? Do you think they are being adhered to?
4. What are the current limitations of the scheduling procedure in Malta? Is subjectivity a major issue in this process?
5. What values are attributed to buildings/sites locally? Can you identify any gaps in the local heritage discourse with regards to the protection of cultural heritage? How can it be improved?
6. Do you think that the scheduling process should follow a more value-based approach?
7. What degree of influence does the general public have in the scheduling process?
8. Do you think that a people-centered or community-driven approach would be beneficial, or is the

general public still biased in its understanding of what constitutes cultural heritage?

9. Do you think there is an issue of familiarity and collective memory with respect to how the public reacts to a given heritage site?
10. What methodologies should be adopted to ensure a less subjective set of criteria? What criterion/criteria do you recommend?
11. Are there any professionals one should speak to regarding this research on scheduling in Malta?

Each interview lasted around 40 to 60 minutes. The snowballing method, referred to by Jones (2004), was adopted for identifying new participants, where each interviewee led to other eligible participants (Question 11). This ensured reliability and supported the strategic selection of participants, although this meant they all belonged to the same lobby, which is a limitation on the findings. The interviewed participants, in alphabetical order by surname, were Ruben Abela, Jonathan Borg, Joseph Magro Conti, David Mallia, Edward Said, Conrad Thake and Joe Zahra. Abela, Mallia, Said and Thake are architects and civil engineers by profession; Borg and Magro Conti are archaeologists; and Zahra is an urban planner (Table 2). Their respective comprehensive reviews and opinions do not necessarily represent the collective view of the entity where they are employed.

Table 2 Participants in the study

Name	Bio notes
Abela, Ruben	Majored in land-use planning and urban design, environmental management and conservation technology Served in managerial posts at the PA and at Heritage Malta Founded the NGO Wirt iż-Żejtun
Borg, Jonathan	Specializes in conservation and cultural heritage management Engaged for several years as a professional officer at the PA responsible for scheduling cultural heritage monuments Currently leads the Heritage Planning Consultations Unit within the SCH
Mallia, David	Specializes in the restoration of monuments and cities Unit Manager at the Heritage Planning Unit, PA Occasional lecturer and examiner at the University of Malta
Magro Conti, Joseph	Specializes in heritage management and conservation. Experience spans from a volunteer with an NGO to a senior official at the Heritage Planning Unit (PA) to Superintendent of Cultural Heritage. Currently advisor to the Ministry for National Heritage Occasional lecturer and examiner at the University of Malta
Said, Edward	Majored in built heritage and landscape conservation Visiting lecture at the University of Malta Founding member of the Villa Frère preservation project
Thake, Conrad	Urban planner, architectural historian, prolific author Associate professor at the Department of Art and Art History, University of Malta Former member, versed in planning, of the Environmental and Planning Review Tribunal (EPRT)
Zahra, Joe	Majored in cultural management and geomatics Currently an executive officer at the Heritage Planning Unit, PA

3 Research findings

The responses of the participants fell broadly under the following themes:

1. Scheduling heritage in Malta (Questions 1 to 3);
2. Shortcomings and limitations of the existing system (Questions 4 to 6);
3. The public as a stakeholder (Questions 7 to 9); and
4. Recommendations for a less subjective methodology (Question 10).

3.1 Scheduling heritage in Malta

3.1.1 The legal framework

The terms "listing" and "scheduling" are used in Malta interchangeably. The concept of the scheduling system in Malta relies mostly on the UK model. The idea of "listing" in Malta dates to the Antiquities (Protection) Act (Government of Malta, 1925). This act, drawing on the UK's Ancient Monuments Protection Act (UK Crown, UK Parliament, 1882), is a comprehensive law providing statutory protection for heritage sites. The Antiquities (Protection) List, first published in the Malta Government Gazette in 1932, was subsequently amended in 1936 and 1939 (Government of Malta, 1939).

The Environment Protection Act (Government of Malta, 1991) reiterated the spirit of the Antiquities Act (Government of Malta, 1925) regarding the protection of monuments and refers to a list. Meanwhile, the Structure Plan (Government of Malta, Ministry for Development of Infrastructure, Planning Services Division, Colin Buchanan and Partners, Generale Progetti SpA, 1990), which was published in 1990, was implemented in 1992. In the Maltese context, listing refers to the NPI. Together with the Malta Scheduled Property Register, the NPI provides the basic reference for cultural heritage protection (Attard and Vella, 2014). The Structure Plan does not use the term "scheduling" but includes a grading system. Structure Plan Policy UCO 7 and ARC 2 were grounded in the UK policies at the time, namely, Planning Policy Guidance 15 (Department of Environment, Department of National Heritage, 1994) and Planning Policy Guidance 16 (Office of the Deputy Prime Minister, 1990).

The Local Plans indicate what should be done to the scheduling of properties, while the SPED aims to place cultural heritage as a central part of contemporary planning, rather than give weighting to the scheduling process. Moreover, the PA's design policy guidelines – set out in the DC 15 – includes policies regarding the scheduling of properties (Malta Environment and Planning

Authority, 2015b) whilst the PA Circular 3/20 (Planning Authority, 2020) offers guidance to applicants and interprets planning policy.

3.1.2 The scheduling procedure

The scheduling procedure commences with a proposition made by the PA, the SCH or the general public (Fig. 1). The PA and the SCH carry out research depending on the case, ensuring that the site is suitable for scheduling. The Executive Council of the Planning Authority may then approve the site for scheduling, calling in the Superintendent according to the DPA, as amended in 2016. Subsequently, the law prescribes an exact process which instructs the PA to inform the owner of that property through notification. This notion, introduced in Maltese legislation in 1992, which predates the later Aarhus Convention (United Nations Economic Commission for Europe, 1998). Similar to the Environment Protection Act (Government of Malta, 1991), the DPA (Government of Malta, 1992) also copied the statutory protection article from the Antiquities Act (Government of Malta, 1925) and added clauses to safeguard the interests of the property owners. Informing the owner about scheduling has nothing to do with observance of any universal human rights,

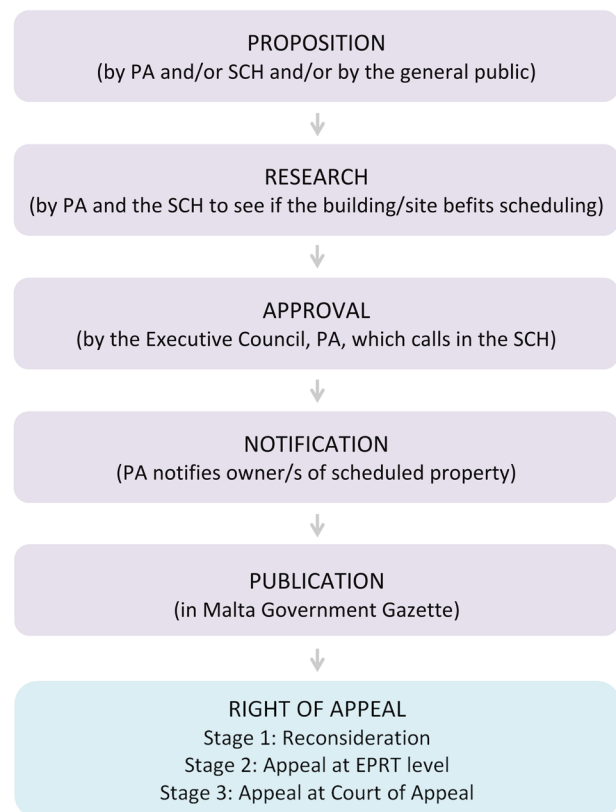


Fig. 1 The scheduling procedure in Malta

but was inserted by those drafting the legislation to protect the rights of property owners from the limitations imposed by statutory protection. In fact, there are further subparagraphs about ownership rights, more designed to enable owners to contest scheduling than to protect heritage itself, while placing a heavy onus on the regulating entities and lengthening procedures. In the DPA (Government of Malta, 1992), the priority was, and still is, to safeguard owners' interests more than to protect heritage. Whilst this is a fair measure, one must understand the real intent of these subclauses, and their impact on the process and the effectivity of scheduling. Such complexities are essential to understanding what is happening in the real world, in this case, Malta. Decisions about scheduling are published in the Malta Government Gazette so that the public is informed, usually finding out through notifications published in two local newspapers, one in Maltese and one in English. Scheduled property owners have at least three opportunities to formally contest scheduling. They may request reconsideration within 30 days of the decision. If the Executive Council does not agree with the reconsideration, the owner may appeal to the Environmental and Planning Review Tribunal (EPRT). The EPRT makes the final decision based on points of law and not on points of merit. Its decisions may be appealed on a point of law at the Court of Appeal.

Structure Plan policies are adhered to "moderately" or "not at all" by applicants for development planning permission. An element of flexibility exists in the interpretation of the 1992 legislation. The wording has not changed but the *forma mentis* has. Once divergence from the scheduling guidelines is allowed, a ripple effect is generated, with different interpretations of the legislation emerging as a result.

3.2 Shortcomings and limitations of the existing system

3.2.1 Grading criteria

Given the limited intervention allowed on a Grade 1 site, the notion of scheduling has negative connotations with property owners. Instead of facilitating sensitive development, it is perceived as a liability and an inhibitor which deprives owners from reaping the real estate potential of their assets, especially in a construction-driven economy. With respect to Grade 3 sites, the potential risk of a building being demolished is real. As one noted,

"the implications of a Grade 3 status are not well understood somehow, since it seems to be an anomaly; the whole purpose of grading is to protect, so

what's the purpose of giving it a Grade 3 so it can be demolished and redeveloped? And that's, I think, something that might merit discussion as well." (Thake, 2022 cited in Zammit, 2022:p.48).

The notion of UCAs was challenged, with participants questioning whether they safeguard the historic centers of Maltese towns and villages. A third of buildings within UCAs, mostly dating to the latter part of the twentieth century, merit Grade 3 classification but are not scheduled, as they are of insignificant or no cultural heritage value and may be demolished. The "protection" element in this policy makes a proviso that the replacement building must be erected in harmony with the surroundings. A Grade 2 designation is known to lead to "façadism", as it is often interpreted as allowing the interior of a building to be gutted as long as the external elevations are retained. Although a need for a new grading, Grade 2*, was expressed, this has not been introduced:

"Right now we are constrained to go either for a Grade 1 building, which basically is telling you that you can do next to nothing with this building, or for a Grade 2, which offers you almost the whole gutting of the building. You have properties which are in between, not gutting it, but perhaps it merits an extra level of protection With a Grade 2 label I can permit that development which is necessary and sensitive."* (Borg, 2022 cited in Zammit, 2022:p.48).

3.2.2 Undervalued cultural assets

The absence of the notion of context has been highlighted by several participants. One of them stressed the importance of zooming in and out from the building level to a village-by-village analysis when conducting the scheduling process. The context of a windmill is as important as protecting the structure itself. Windmills, which are village landmarks, were situated in prominent geographic locations to take maximum advantage of the wind. Apartment blocks next to such structures destroy the context, as happened with the Ta' Fortun and Ta' Marziena windmills. The case of historical gardens is similar, as seen, for example, when the surrounding construction close to Villa Frère impinged on the context and the vistas of the garden. Furthermore, locally some skylines are being compromised and there is a case for extending the scheduling process to preserve them as part of the context of a given site. There is lack of appreciation of recent buildings or those

which do not have visual appeal, although this mindset is slowly changing. Among the cultural assets often forgotten are dark heritage sites, such as historic cemeteries.

Other participants expressed similar concerns about the lack of protection and imminent loss of industrial heritage and buildings dating from the Modernist era. There is a misconceived notion that buildings only merit protection if they are 50 years or over. The terraced house typology is giving way to the apartment blocks:

"Unfortunately, we are losing fine examples of this kind of architecture to be replaced with five-storey blocks, and 100 years down the line there will be nothing which documents the last half of the 20th century when it comes to architecture." (Abela, 2021 cited in Zammit, 2022:p.52).

Bias exists amongst professionals. British and Modernist buildings, as well as industrial and vernacular architecture, are undervalued. Some participants were criticized by experts for requesting to schedule buildings dating to the Arts and Crafts movement. Another shortcoming is that policies do not provide specifics about how such sites can be restored. With respect to Modernist architecture,

"where you have clean galvanized steel windows with very slim profiles, remove those and you've lost; when you remove the windows of a building and you put something sterile, you remove the soul of the building. And these accessories – as I call them – these installations, not the stone and the mortar, it's the color scheme, it's the apertures." (Said, 2022 cited in Zammit, 2022:p.52).

Modernist and industrial buildings and historic centers of towns and villages made up of humble domestic buildings are not receiving the appropriate protection.

3.2.3 Subjectivity, national agencies and legal loopholes

Some participants claimed that there is little subjectivity in the scheduling process as it is carried out by experts, while others argue that subjectivity is inevitable but occurs mostly in the public sector and when public pressure builds up. In any decision-making process the element of subjectivity cannot be eliminated, but the following steps can reduce it:

1. adopting a reflexive approach whereby one constantly questions oneself;

2. widening the internal consultation boards; and
3. carrying out the scheduling procedure thematically.

Shortcomings were noted among government agencies whose responsibility it is to conduct the scheduling process. The PA and the SCH do not pull in the same direction, undermining the whole process. On occasion, government-based institutions show reluctance to schedule privately owned properties, as they are more legally challenging. There seems to be a general apathy towards scheduling, especially at the PA level. Both at the PA and SCH suffer from a lack of human resources at their respective units which address scheduling. Given the amount of work this process entails, backlogs develop and sites facing imminent threats are not scheduled and thus not protected by law.

Legal loopholes are used extensively. Although the law states that one can only request a reconsideration within 30 days, an owner may request the PA debates the scheduling rather than reconsiders it. The argument is often that the basis for the scheduling has changed, either due to newly available information or subsequent development of the surrounding area, due to which the site has lost its original value. In such cases, the Executive Council restarts the whole process again. A significant limitation in the process is at the stage of the EPRT. The tribunal follows a planning-based process; a participant proposed that rather than delving into the legal remits whether a property should be scheduled, the tribunal should query the reliability of the research and the values attributed to a given property.

3.3 The public as a stakeholder

3.3.1 Public participation

Prejudice exists when it comes to preserving heritage in Malta (Mallia, 2006). A hierarchy of who is involved in the decision-making process has to be established; it is necessary to assess how much cultural capital is present and how rational decisions are taken. The public tends to be split into those who want to protect sites and those view such protection as an economic liability. Thus, it depends which side of public opinion is contributing to the process.

Once general public opinion gains momentum, it influences decision-making. The public should have a say in the decision-making process in relation to scheduling, although the approach should be academic and conveyed through professionals. One participant highlighted the importance of public pressure and NGOs.

Insights revealed through public participation may prove beneficial to scheduling, for example, through a website on which experiences of individuals regarding a certain space or building can be shared.

3.3.2 Public perception, familiarity and collective memory

With regards to elements such as familiarity and collective memory,

"cultural heritage is not an inherent value. It is a social value. It does not exist on its own. Something becomes cultural heritage because someone, that is society, attributes it the value of cultural heritage Something does not become cultural heritage on its own. People ascribe it as cultural heritage. There's an element of subjectivity there, but that subjectivity is rooted in the common experience of the place or building or site. And experience is in turn rooted in collective memory." (Borg, 2022 cited in Zammit, 2022:p.54).

The collective memory of a place is what makes it cultural heritage. According to one of the participants, for many people, especially those from Valletta, the Royal Opera House is not a ruin; what comes to mind when they think of it is the building as a whole. The collective memory of the place is still as it was built in 1867. This is the power of the collective memory; it is the sense of collective memory that should be preserved. Whether collective memory is tied to a building or a single tree, within it lies a social, cultural and community link that should be safeguarded.

Most participants mentioned the downsides of public perception and how it creates bias in terms of heritage value attributed to building typologies. Post-war, industrial and vernacular buildings are architectural typologies often underappreciated by the public. The roots of this lie in society's cultural capital and the *forma mentis* of the dominant public consciousness:

"There will always be an element of subjectivity in it – it depends whether the person is biased towards the Baroque and does not understand other things or whether s/he appreciates other architectural styles. This is why the notion [of] cultural capital needs to [be] all encompassing." (Magro Conti, 2022 cited in Zammit, 2022:p.56).

The way to expand society's cultural capital is through education and by increasing awareness through walkabouts and public lectures. Public perception needs to be processed by the authorities, as public pressure – to schedule or otherwise – too often stems from a "not in my backyard" (NIMBY) attitude. This phenomenon was mentioned by several participants as a major issue in public perception, and in how society approaches the local scheduling system. Moreover,

"in Malta we have a very clear understanding of heritage: 'Your building is heritage, mine is not' – NIMBY. ... For society, heritage is restricted to museums for the foreigners. For many, it's fine as long as burial sites and cart ruts are not located in their plot, 'not in my backyard'." (Mallia, 2022 cited in Zammit, 2022:p.56).

3.3.3 Public involvement in scheduling

Cultural heritage is an expression of identity and community; as such, it physically grounds a community or binds a nation together. For this reason, an approach which combines elements from both a value-based system and a community-driven system, which could be linked together, was suggested. Participants reiterated the duality of various segments of the public and their respective vested interests. Several participants expressed their dismay at the prospect of more hands-on public involvement in the local scheduling process, stating that responsibility should be left in the hands of trained professionals. Public participation was welcomed provided it is processed by trained professionals at the competent authorities.

3.4 Recommendations for a less subjective methodology

The recommendations put forward by the participants with respect to a less subjective system to schedule cultural heritage are given in Table 3. To ensure anonymity, the reference number of the participants does not follow the order listed in the methodology.

4 Conclusion

Based on the perspectives of leading heritage professionals, this study outlined the process of statutory protection of immovable cultural heritage in the Maltese Islands. It identified several shortcomings and limitations and presented a number of implementable recommendations for a less subjective, more inclusive scheduling process. A more

Table 3 Recommendations for a less subjective scheduling system

Participant	Recommendations
1	Establish heritage criteria – architectural, historic, research, contextual, etc. – and allocate value to each to arrive to a particular grade. Reduce subjectivity by making information accessible, thus reducing likelihood of lack of awareness.
2	Employ a thematic methodology where prioritized criteria are identified for sets of buildings or sites requiring scheduling. Given that heritage values are not static, a reflexive process is recommended; one needs to know what and why a given heritage asset was scheduled. Refer to the UK's Principles of Selection for Listed Buildings (Department for Digital, Culture, Media & Sport, 2018) and follow the same <i>forma mentis</i> when carrying out the scheduling process.
3	Adopt a heritage value computation, as recommended by Zammit (2022); it is important to include values such as rarity, group value and authenticity in the equation.
4	Undertake a more systematic, perhaps thematic, approach in which the same types of heritage assets are scheduled together. There should be an expert's report which states why a building or structure has significance, so that any decision taken can be based on scientific evidence and qualified documentation. Decisions should be based on issues such as rarity, danger of extinction, the monument's contribution to our cultural landscape, etc. Decisions should be taken by people with a good understanding of heritage, not just any government-appointed individuals. Establish a distinct board focused on scheduling which is independent from the PA.
5	Similar to participant 1
6	Establish a network of practitioners, academics and students to assist with the scheduling process while working together to standardize procedures on a national level. Create a checklist and a standard process and engage a taskforce with a team focused on identifying heritage assets such as gardens on a village-by-village/town-by-town basis. Introduce a standard manual for restoration criteria such as materials, installations, apertures and styles.
7	Issue a call for NGOs to compile a list of properties. Community involvement should be clearly stated, together with the collective memory aspect of a given listed property. Forward the compiled list to SCH for its evaluation. Once completed, together with other properties identified by the SCH, the list should be published for public consultation within a reasonable fixed term, say a year, from submission. Once the consultation process is over, the properties should be scheduled without the right to appeal the decision.

inclusive assessment of the scheduling process in Malta would be secured if a more pluralistic view – those against heritage conservation as perceived by heritage managers and conservationists, such as other members of the public and developers – was ensured. If the interviewees included those from outside the cultural heritage sector – such as owners of scheduled properties and/or development applicants, especially those who had filed requests for reconsideration or appeal, or challenged an EPRT decision at the Court of Appeals – the findings would be more significant.

The way in which economic (market) value impacts on the heritage significance and conservation value of a given building and/or site is at the crux of the matter. Property costs and the returns/revenue generation from its re-adaptive reuse – after taking into account the costs of purchase, restoration, rehabilitation and so on – is one way to determine this. Alternatively, a property may be considered by developers or speculators as a potential building plot for redevelopment, perhaps with the fewest restrictions with respect to heritage conservation. In this case, the heritage value of the property is considered a liability, and if the redevelopment option is favored then the heritage value is rescinded.

A potential, less subjective, scheduling process with respect to a given heritage site is through the use of a holistic system of heritage valorization undertaken by and published

in Zammit and Bianco (2022a). This prototype system was tested on a number of scheduled Grade 1 buildings of historic, architectural and contextual value in Malta's capital, Valletta, a UNESCO World Heritage Site since 1980 (Zammit and Bianco, 2022b).

Ethical Clearance

In accordance with the University of Malta's Research Ethics Review Procedures, the questions asked during the structured interview were cleared by the Faculty Research Ethics Committee (FREC). FREC manages the process of reviewing applications submitted for ethical clearance to ensure that the University of Malta's Research Code of Practice is adhered to. Prior to the interview, each participant was briefed about the nature and objectives of the study through a personalized information letter and signed a consent form. Participation was entirely voluntary and each had the option to decline or withdraw from the interview at any time without providing a reason. Although they had the option to remain anonymous, none opted for it; they all consented for their names to be acknowledged. Furthermore, in terms of the General Data Protection Regulation (GDPR) (EU) 2016/679 (European Parliament, Council of the European Union, 2016) and the XX of 2018 Data Protection Act (c. 586) (Government of Malta, 2018),

each participant had the right to access, rectify and, where applicable, ask for the data concerning him/her to be erased at any given time. As per clearance granted for this study, all data compiled during this study will be permanently deleted within four years from when it has been collected.

Acknowledgement

Nadine Zammit is grateful for the professional support and insight provided by, in alphabetical order by surname,

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- Ruben Abela, Jonathan Borg, Joseph Magro Conti, David Mallia, Edward Said, Conrad Thake and Joe Zahra. Their valuable contributions, especially those from Magro Conti, are appreciated.
- Lino Bianco would like to thank Professor Kevin Aquilina, former Dean of the Faculty of Laws (University of Malta) and former Chairperson of the Planning Appeals Board (Malta), for his valuable comments on an earlier draft of this paper.
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