



International Council on
Monuments and Sites
Conseil International
des Monuments et des Sites

**REPORT ON THE UNESCO-ICOMOS REACTIVE MONITORING MISSION TO
OLD CITY OF DUBROVNIK, CROATIA
FROM 27 OCTOBER TO 1 NOVEMBER 2015**



Old City of Dubrovnik ©SSesum, UNESCO

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1. BACKGROUND TO THE MISSION

1.1. Inscription History

The World Heritage property Old City of Dubrovnik was inscribed on the World Heritage List in 1979 (3rd session of the Committee) on the basis of criteria (i) and (iii).

The 'Pearl of the Adriatic', situated on the Dalmatian coast, became an important Mediterranean sea power from the 13th century onwards. Although severely damaged by an earthquake in 1667, Dubrovnik managed to preserve its beautiful Gothic, Renaissance and Baroque churches, monasteries, palaces and fountains. Damaged again in the 1990s by armed conflict, it is now the focus of a major restoration programme coordinated by UNESCO.

The property was extended in 1994 (18th session of the Committee) to include areas outside the city walls. These included: the Pile medieval industrial suburb, a planned development of the 15th century; the Lovrijenac Fortress, located on a cliff, which was probably begun as early as the 11th century, but owing its present appearance to the 15th and 16th centuries; the Lazarets, built in the early 17th century to house potential plague-carriers from abroad; the late 15th-century Kase moles, built to protect the port against south-easterly gales; the Revelin Fortress, dating from 1449, which was built to command the town moat on its northern side; and the island of Lokrum to the south-east of Dubrovnik, some 500m from the coast. A Benedictine abbey was founded on Lokrum in 1023, the first of several in the Republic of Dubrovnik. In the late 15th century, a new

monastery was built in Gothic-Renaissance style to the south of the ruins of the Benedictine establishment. During their occupation Lokrum in the early 19th century, the French began to work on the construction of the Fort Royal Fortress, which was completed by the Austrians in the 1830s.¹

The property was inscribed on the List of World Heritage in Danger in 1991 and removed from the List of World Heritage in Danger in 1998.

1.2. Inscription criteria and World Heritage values

Justification provided by the State Party in 1979 [Extract from Nomination file] :

The historical urban (and architectural) complex of Dubrovnik has retained to date the essential elements of the medieval structure of a fortified town: the ramparts, the lay-out of the streets and squares, impressive public edifices (lay and religious) and a great many private dwellings. Regardless of any considerations on the particular artistic value of the edifices, here we find primarily a complex of outstanding value which owing to the host of messages - artistic, urbanistic, cultural and historical - make Dubrovnik one of the most important properties within the borders of Yugoslavia. Nearly all stages of the development of the town through the 6 centuries have been stamped and preserved in its structure and particularly the extensive town planning interventions of the XIIIth century by means of which this complex had been given its' unity. When the preserved documents which drew up the laws according to the "status-, of town, are compared with the town's present condition, one is made aware that the urbanistic ideas of its "planners" were only implemented. 'This planning of the town had its direct source in the aim of its builders to create the monumental centre of a large territory, which was a unique medieval State (Republic) in the making, and which has actually succeeded in retaining its freedom in spite of very critical conditions until the beginning of the XIXth century. These are the major events which account for the quality as well as the outstanding result and the deliberate tendency towards an imposing style which is ever noticeable in the construction of the private dwellings in town. Emphasis is laid on the importance of the fortified walls, surrounding this almost entirely preserved complex, with its big defensive towers representative of the military architecture from the XIIIth to the XVIIth century. In the construction of these "utilitarian" edifices, as elsewhere, there appears in the town a tendency towards the grandiose style and a "aesthetic" features even in the way the stones are hewn as well as in the formal features combining functional design with aesthetics. A characteristic example of the latter is to be found in the big tower in the north-west corner of the town ("Minceta"), built by M. Michelozzi and Georgius Dalmaticus, the most important masters of the XVth century.

When all those elements are taken into consideration, one becomes aware that the urban historical complex of Dubrovnik is a unique creation of medieval architecture and town planning, which has exerted considerable influence not only within a small area but on the greater area of the Adriatic Coast and the Balkans. Among all the medieval European cities, Dubrovnik stands out due to the mutual relationship which has been established between the existing edifices and the whole complex and by the enormous documentation allowing each stage of its growth to be studied in the light of history.

In 1976, the Institute for the Preservation of Historical Monuments in Dubrovnik was awarded the European Gold Medal bestowed on the most valuable historical monuments in Europe. F.V.S. Foundation in Hamburg, accountable for the

¹Source: Draft RSOUV reviewed by ICOMOS in 2014.

selection made by the board (Curatorium) of the Foundation, has based the attribution of the Medal : according to the following criteria : "The real and exemplary aim of preserving the original and historical appearance of the town, which has been applied for three decades in a well-documented fashion, under the competent direction of the Institute for the Preservation of the Historical Monuments and Natural Properties in Dubrovnik, and considering as well as the systematic archeological research, the restoration and the revitalization of the architectonic fixed monuments and the movable cultural property in town and in the territory of the former Ragusan Republic"

ICOMOS Evaluation (1993)

Justification by State Party

The immediate surroundings of the monumental centre of Dubrovnik consist of a narrow urban strip that follows the town ramparts from east to west, within which are situated certain properties which are integral components of the monumental unity of Dubrovnik.

The island of Lokrum protects the town on its southern side, and with its luxuriant vegetation provides a counterpart to the stone of the old city itself.

Evaluation:

Qualities

The areas proposed for the extension of the existing World Heritage Site are integral to the overall historic cultural monument of the old city of Dubrovnik. In the opinion of ICOMOS, their inclusion would greatly increase the cultural significance of the inscription.

Additional comments

At the 17th Meeting of the Bureau of the World Heritage Committee held in Paris in June 1993 (VIII.3) ICOMOS requested that construction of new buildings be avoided in the proximity of the Lovrijenac and Revelin Fortresses, and also proposed that legislation be enforced in order to prevent the construction of high buildings along and close to the coastline, which would spoil the best view of the skyline of the old city of Dubrovnik when approached from the sea. The Rapporteur, in supporting the ICOMOS proposals, requested that measures be taken to limit the use of billboards and neon signs in and around the old city. This is in effect a request for the definition of a buffer zone, with statutory control over development, building heights, etc, which was not requested when the original inscription of the old city on the World Heritage List was made in 1979.

At the time of preparation of this evaluation (27 October 1993) this information had not been supplied by the State Party.

Recommendation

That consideration of this proposal for extension be deferred to await provision by the State Party of satisfactory evidence of an effective buffer zone around the site. In the event of such information being received, ICOMOS recommends that the World Heritage Site be extended to include the areas indicated in the additional nomination.

1.3. Examination of the property's state of conservation by the World Heritage Committee at its 38th session (Doha, 2014)

Current conservation issues

After receiving information from the civil society, the World Heritage Centre requested the State Party to provide clarifications on a large resort project in the vicinity of the World Heritage property, as well as on the progress in the regulation of cruise ship tourism. On 28 January 2014, the State Party submitted a state of conservation report providing details regarding the potential impact on the property's Outstanding Universal Value (OUV) of the cruise ship tourism, as well as of the planned sport and recreation centre with golf course and tourist settlement. The State Party reported that the proposed recreational centre would cover an area of protected forest for some 359 ha on the plateau of Mount Srđ and Bosanka, situated directly above the City of Dubrovnik. The proposal included the construction of two golf courses, a sports centre, two hotels, 240 villas, 408 apartments, an amphitheatre, equestrian club, parks, promenades, and other facilities. Some of the villas would be constructed at the edge of the escarpment giving them views over the Old City.

The State Party informed that this project was going to be approved and that the construction of apartments and golf courses was going to start. It noted that the Dubrovnik Conservation Department had determined that, after some revisions to the zones and the volumes of the centre, the planned development aligned with previously issued conservation guidelines. The Urban Development plan for the City of Dubrovnik was also revised and adopted by the Dubrovnik City Council on 17 August 2013. As of January 2014, construction of the planned development had not yet started.

Regarding large cruise ships, the State Party informed that the Ministry of Tourism planned to develop a new "Croatian Tourism Development Strategy until 2020," which would address all relevant issues. It also informed that a tourism strategy would be a part of the property's management plan. The State Party launched the review of the national legal framework to strengthen the legislative protection and management of World Heritage properties in Croatia.

Analysis and Conclusions of the World Heritage Centre, ICOMOS and ICCROM

The World Heritage Centre, ICOMOS and ICCROM concluded that the State Party had not provided information, in conformity with Paragraph 172 of the *Operational Guidelines*, of its intention to undertake or to authorize new constructions which may affect the OUV of the property.

The documents provided upon the request by the World Heritage Centre demonstrated that the large size of the development could have an irreversible impact on the property's OUV. The development would eradicate the clear distinction that has historically existed between the urban complex of Dubrovnik, as a unique creation of medieval architecture and town planning, its landscape and rural environment setting.

The analytical documentation annexed to the state of conservation report provided by the State Party did not assess the proposed development in terms of its potential impacts on the attributes that sustain the Old City of Dubrovnik's OUV.

It was recommended therefore that the Committee request the State Party to halt any work on the project until a comprehensive study and Heritage Impact Assessment (HIA) in terms of its cumulative impact on the OUV of the property had been completed for the property and its larger setting.

In terms of the impact of large cruise ships, more concrete details on the foreseen solutions to the problem associated with high tourist numbers visiting the property in a very short time (including cruise ship tourism) were needed, in particular details of

precisely how the City Management Plan and the Tourism Development Strategy would address present and future tourism challenges.

Given the current situation, a reactive monitoring mission was needed to assess current conditions at the property, to consider the potential cumulative impacts (direct and indirect, including visual, physical, social, cultural and economic) of the project on the property's OUV, as well as to review potential threats which could have deleterious effects on its inherent characteristics and which would justify its inscription on the List of World Heritage in Danger in line with Paragraph 179 of the *Operational Guidelines*.

Decision: 38 COM 7B.25

The World Heritage Committee,

1. Having examined Document WHC-14/38.COM/7B.Add,
2. Recalling Decision **22 COM VII.17**, adopted at its 22nd session (Kyoto, 1998),
3. Takes note of the information submitted by the State Party regarding the large project planned for the plateau of Mount Srd and Bosanka in the vicinity of the World Heritage property;
4. Requests the State Party to provide the project documentation and the respective heritage impact assessment (HIA) before any development works have started and any final decision has been taken in line with Paragraph 172 of the *Operational Guidelines* ;
5. Requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to assess current conditions at the property, including the evaluation of potential development impacts and identify options for development proposals in accordance to the OUV of the property;
6. Also requests the State Party to submit to the World Heritage Centre for review by the Advisory Bodies the Management Plan of the property, including a tourism strategy and legal regulations of cruise ship tourism, as well as the project documentation and the respective heritage impact assessment (HIA);
7. Further requests the State Party to submit to the World Heritage Centre, by 1 February 2015, a progress report on the state of conservation of the property, and by 1 December 2015 a state of conservation report on the implementation of the above, both reports including a 1-page executive summary, for examination by the World Heritage Committee at its 40th session in 2016.

The list of previous World Heritage Committee Decisions (3rd to 22nd session) is provided in Annex III.

1.4. Justification of the mission

Following development plans submitted by the State Party to the World Heritage Centre and Decision **38 COM 7B.25** (Doha, 2014), a reactive monitoring mission took place to assess current conditions at the property, to consider the potential cumulative impacts (direct and indirect, including visual, physical, social, cultural and economic) of the project on the property's Outstanding Universal Value, as well as to review if the property was faced with threats which could have deleterious effects on its inherent characteristics.

The detailed Terms of Reference for the mission are provided in Annex I.

2. LEGAL FRAMEWORKS AND MANAGEMENT MECHANISM

- Law on the reconstruction of the endangered monumental complex of Dubrovnik (OG, no. 21/86)
- Law amending the Law on the endangered monumental complex of Dubrovnik (OG, no. 33/89)
- Law on amending the Law on the endangered monumental complex of Dubrovnik (OG, no. 128/99)
- Law on amending the Law on the endangered monumental complex of Dubrovnik (OG, dated February 2014).
- Law on the founding the Committee of the Municipal Council of the City of Dubrovnik for monitoring the condition of monumental heritage, pursuant to Article 31 of the Statute of the City of Dubrovnik («Official Gazette of the City of Dubrovnik», No.9/01).

This Committee monitors the work of the institutions that are responsible for the preservation, reconstruction, and maintenance of cultural heritage, and presents the developments before the Municipal Council.

In its work, the Committee cooperates with the Institute for the Reconstruction of Dubrovnik, the Ministry of Culture - Conservation Office in Dubrovnik, the Society of Friends of Dubrovnik Antiquities, and the administration of the City of Dubrovnik. The Committee has a chairperson, a vice chairperson and three members elected from the Municipal Council. Besides the members of the Committee, who are councillors, the Committee also includes (having an advisory role without the right to make decisions) the representatives of: the Institute for the Reconstruction of Dubrovnik, the Ministry of Culture Conservation Office in Dubrovnik, the Society of Friends of Dubrovnik Antiquities, the Administrative Department for Culture of the city of Dubrovnik, the Administrative Department for Physical Planning and Environmental Protection.

As per the information received during the Mission, coordination of development of the Management Plan was delegated to the Institute for Restoration of Dubrovnik. The Institute has established a Committee for monitoring the Management plan development and the necessary financial resources to fund the production of the plan are included in the city's budget. Work is in hand to tender for and to appoint a contractor to compile the Management Plan.

3. IDENTIFICATION AND ASSESSMENT OF ISSUES

A.1 Major restoration and new construction projects within the World Heritage property which could affect its Outstanding Universal Value

The Reactive Monitoring Mission ("Mission") included an extensive visit of the inscribed property, including the City Walls and other key sites and buildings. These visits allowed the Mission to view post-1979 earthquake and post-1991/92 siege restoration projects, together with planned and potential new projects. The Mission was impressed by the extensive documentation, excavation, restoration and conservation programmes and projects conducted by the Government of the Republic of Croatia, the Institute for the Restoration of Dubrovnik and the Association of Friends of Dubrovnik Antiquities.

The Mission identified five major restoration and one new construction projects: the City Walls; the so-called Pustijerna Site; the Orlando Column; air conditioning units; the Historic Sewage system; and a possible landing stage adjacent to the Lazaretto.

The City Walls: The medieval and later City Walls are one of the most notable attributes of the property which were visited by an estimated 1 million visitors in the 2015 tourist season. The maintenance and management of the City Walls is governed by a contract between the City of Dubrovnik and The Association of Friends of Dubrovnik Antiquities. The Association administers the walls and charges an entry fee. The revenue is spent by The Friends on the constant maintenance of the walls and other cultural heritage assets in the territory of the ancient Dubrovnik Republic, currently including the restoration of the Church of St Blaise and the planned restoration of the Rector's palace. Permits for restoration work are issued by the Conservation Department in Dubrovnik, Directorate for the Protection of Cultural Heritage, Ministry of Culture. Contractors, licensed by the Ministry of Culture, are employed, but their choice, as per information received, is not made according to the regular procurement rules of the Republic of Croatia. In spite of the apparently robust control mechanism, the Mission was concerned to note that the contractors restoring the walls have extensively used cement, rather than lime mortar, in new pointing and capping, contrary to best conservation practices.

In view of the potential damage to the Walls caused by the use of cement the Mission **recommends** that the State Party should immediately ensure that traditional materials are used, unless there are clear extenuating circumstances. Guidelines on best conservation practice should be compiled by the Conservation Department in Dubrovnik, Directorate for the Protection of Cultural Heritage in cooperation with the Ministry of Culture, and should be strictly followed by The Association of Friends of Dubrovnik Antiquities in all further activities and projects. To ensure that future restoration complies with this requirement all restoration works should also be subject to regular monitoring by the responsible authorities as well as the Association itself.

The terms of the maintenance and exploitation contract should be carefully revised by introducing, if such kind of contract is maintained in the future, transparent procedures of quality control by the State institution in charge of the implementation of the World Heritage Convention in Croatia, as well as by imposing strict rules for the conservation, restoration and maintenance works.

The repair works of all parts of the Wall damaged by previous inappropriate interventions should be conducted as soon as possible to prevent any threats to the structural stability of the Wall.

The Pustijerna Archaeological Site: This vacant site is located in the south-eastern part of the City. Excavations conducted between 1984 and 1987 uncovered impressive remains dating from the 12th century up to the time of the earthquake in 1667, after that date the site was abandoned and used as a rubbish tip. This tip sealed streets and the complete ground floor of buildings. Plans have been drawn up for the redevelopment of the site. The Mission **recommends** that when these plans have been developed the details are submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies. In this connection the Mission visited a late-medieval and post-medieval foundry site in the north-west corner of the walled city adjacent to the Gorniji ugao - tower. This site had also been abandoned after the 1667 earthquake and then also used as a rubbish tip until its archaeological excavation between 2005 and 2008. The foundry remains were subsequently displayed in an exemplary manner, fully respecting best conservation practice, beneath a concrete raft on which a playground has been constructed.

The Orlando column: The Mission visited the Orlando Column at the eastern end of the Stradun, in front of the Church of St Blaise. This column is a stone pillar decorated with a relief of Orlando (Roland) which served as the base for the City's flagpole. The column was restored 5 years ago, but its stone base is now displaying serious cracks. As a

precautionary measure, the flagpole has been removed at the request of The Conservation Department in Dubrovnik, Directorate for the Protection of Cultural Heritage, Ministry of Culture, to avoid any further decay of the monument.

The Mission **recommends** that a conservation report on the column should be prepared which both explains the restoration measures already undertaken during the last intervention and provides potential options for its future conservation and stabilization. The options could include conservation *in situ*. This option would presumably mean that the flagpole could never be re-erected. A second option could include the removal of the original column to an indoor museum. This option would allow the original to be replaced with a replica re-enforced in such a way as to allow the flagpole to be re-erected. The Mission noted that this second option is the solution that has already been employed for the replica *Zelenci*, the bronze figures which strike the hour in the city clock tower; the originals are displayed in the Rector's Palace museum. The options should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies.

Air conditioning Units: The visual impact on the property of air conditioning units has been a cause of comment and concern for some time. A report on the current consent and control mechanisms managed by the Conservation Department in Dubrovnik was presented to the World Heritage Centre in 2012. The Mission noted the continuing 'visual clutter' of external air conditioning units and it was informed that in the long term a centralised and communal air conditioning and heating system might provide a solution. The Mission noted that such a system might have a major impact on the buried archaeology of the City. In the event of this option being pursued the Mission **recommends** that a Heritage Impact Assessment, based on a thorough evaluation of the likely extent and significance of affected archaeological resources should be conducted in accordance with the *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* issued by ICOMOS in 2011, and the project details, including the HIA, should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies.

The Historic Sewer System: The city sewer system was begun in the late 13th century and sections of this late-medieval system are still in use, in spite of earthquake damage. The present system combines both rain and grey water, including increasing quantities of fat from restaurants. It is recognised that repairs are urgently needed and that the rain and grey water needs to be separated. The Mission was informed that a plan to survey, restore and reconfigure the sewage system was in the forward restoration programme of the Institute for the Restoration of Dubrovnik. In the long term innovative solutions to sewage and rubbish disposal would be explored. The Mission **recommends** that the Management Plan identifies the programme for the restoration and upgrading of the existing system. Since this will be a major civil engineering intervention archaeological investigation and recording also need to be factored into this work. The details of the restoration and upgrading programme should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies.

The Lazeretto; possible Quay/Landing Stage with connection to the Old Port: The Mission was informed of a proposal by the City of Dubrovnik authorities, to construct a new quay or landing stage adjacent to the recently restored Lazaretto (Quarantine Hospital) complex and linked to the Old Port by a walkway. The purpose of this construction would be to cater both for the estimated 100,000 people who visit the island of Lokrum by boat and also for the transfer of passengers from cruise ships anchored off the same island. This proposal is opposed by the Ministry of Culture, Conservation Department in Dubrovnik on the grounds of: the negative impact on the recently restored

historic structure; the possible false interpretation of the historic use of the Lazeretto; the practical difficulty caused by currents of creating a quay outside the Old Port's Kaše breakwater (soon to be repaired); and the impact on the natural shore line. The Mission recommends that this project should not proceed, and endorses the position of the Conservation Department of the Ministry of Culture.

A.2 Major new restoration or construction projects within the buffer zone of the World Heritage property which could affect its Outstanding Universal Value

Possible northern pedestrian zone: The Mission was informed of a possible traffic management scheme which would result in the present tourist drop off point adjacent to the northern Pile gate being moved further north to the vicinity of the existing main multi storey car park. This proposal might involve making the existing roads in the buffer zone more pedestrian friendly. The Mission **concluded** that this proposal was unlikely to have any impact on the Outstanding Universal Value of the property.

Possible tunnel from port of Gruž with a southern terminal possibly in the north buffer zone: The Mission was informed of a possible proposal for a road tunnel to be constructed to take local and tourist traffic out of the congested northern suburb between the property and the cruise terminal at the Port of Gruž. This proposal is apparently subject to a feasibility study financed by the French Government. If this proposal is taken forward the main impact on the property might be on the northern buffer zone where the southern portal of the proposed tunnel might be situated, together with any associated infrastructure e.g. a multi storey car park, bus terminal and/or associated commercial development. It might also be necessary to create an entirely new pedestrian street from the vicinity of the present multi storey car park to the Pile Gate. The Mission **recommends** that in the event of this proposal being carried forward a full Heritage Impact Assessment should be undertaken in accordance with the *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* issued by ICOMOS in 2011, and the project details, including the HIA, should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies.

A.3 Major new restoration or construction projects in the vicinity of the World Heritage property which could affect its Outstanding Universal Value

Sports and Recreation Centre with a golf course and the Bosanka North and Bosanka South Tourist Resorts

This scheme for a golf resort is planned for the plateau on Mount Srđ which lies to the east of the property. The plateau forms part of the property's hinterland and is a historically significant landscape, with the remains of a fortification system, in its own right. The surface of the plateau is a mixture of largely untouched natural vegetation and rock exposures. The plateau is not visible from the property except at its southern end around the village of Bosanka. At this point the plateau merges with the steep, westward facing, scarp of Mount Srđ. This partially wooded scarp rises directly behind the city and provides a dramatic backdrop to the property. On the actual crest of Mount Srđ the Napoleonic Fort Imperial is situated directly overlooking the inscribed property.

The golf resort project has been in preparation since 2005. It is aimed at an international clientele and its construction is part of the city's objective of widening its tourist and sports facilities. From the outset local NGOs expressed major concern over the impact of this proposal and their representations to the World Heritage Centre contributed to the decision to undertake the reactive monitoring Mission.

The final proposed development area is 310 ha. The scheme envisages a private resort of 250.01 ha with golf courses, hotel, three lakes and 240 villas, and a 59.99 ha public recreational area and sports centre around the edge of plateau which would retain the existing ecology and include the restored historic fortifications whose visual connections would be preserved, together with associated infrastructure. The outline framework of the scheme has now been identified in the Dubrovnik-Neretva County's *Physical Development Plan* and the City of Dubrovnik's *Physical Development Plan and General Urban Plan*. A translated summary of the planning documentation was made available to the Mission who also visited the Srđ plateau itself. Presentations were also made to the Mission. The Mission also noted that no detailed plans have yet been produced.

An original environmental impact study had been prepared in 2012, together with two visual impact studies on the massing of the proposed buildings on the Srđ plateau. These studies confirmed that some of the buildings would be visible from the inscribed property. Accordingly The Conservation Department in Dubrovnik, Directorate for the Protection of Cultural Heritage, Ministry of Culture objected to the heights of specific buildings on the plateau and particularly on the crest of the Mount Srđ scarp overlooking the city. Further studies were carried out and the heights of specific buildings on the plateau were reduced and some buildings were moved away from the crest to ensure that the setting of the city would not be compromised, since no new structures will be visible. Following these alterations the Conservation Department endorsed the Urban Development Plan which received its final approval in 2013. No works have begun, but the first phase including the refurbishment and adaptive reuse of Fort Imperial is due to begin. In addition on 12 October 2015, in accordance with the Urban Development Plan, the Ministry of Construction and Physical Planning issued the Location Permit for the following:

- Construction of the recreation park with the sports centre and related infrastructure;
- Construction of the golf course, (9+18 holes) with related infrastructure;
- Reconstruction of the road D 8 to Bosanka, through a defined corridor;
- Construction of the water supply pipeline; and
- Replacement of the overhead power line by an underground cable.

The World Heritage Committee requested (Decision **38 7B.25**) that the State Party should provide a Heritage Impact Assessment (HIA) on the impact of this proposal before any final decision was taken or any development works started. Prior to the Mission the HIA report had been submitted to the World Heritage Centre by the State Party. The report was commissioned by The Institute for the Restoration of Dubrovnik and the developer from the Institute of Urban Planning, Physical Planning and Landscape Architecture, Faculty of Architecture University of Zagreb. The HIA was prepared following the *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* issued by ICOMOS in 2011. A detailed assessment of the HIA was the main focus of the Mission's visit. The project leader of the report, Prof. Krunoslav Smit, gave a further verbal presentation on the HIA to the Mission. The Mission members were also able to consider the findings of the report on the ground and to visit the various viewpoints ('lookout points') identified in the HIA.

The HIA identifies 16 cultural heritage attributes of Outstanding Universal Value of the property. The report identified 2 groups of attributes: the first group consists of 7 attributes which 'create internal and direct experience of the city and its walls'; the second group consists of attributes which shape 'the outer experience of the city and its surroundings outside the walls'. The value of each of these attributes is then assessed. 13 types of impact on these attributes from specific viewpoints are then identified, together with their magnitude and significance. The conclusion of the HIA is that there is no danger to the World Heritage status of the first group of attributes, but that there is a moderately significant danger to the second group.

The HIA contains an important *caveat* that the visual impact assessments are based on the assumption that the new buildings to be constructed immediately to the east of the crest of the Srđ plateau overlooking the property will be set back from edge of the plateau and of such a height that the proposed new buildings will not be visible from any point of the property. Since no detailed plans are yet available, but only initial concept drawings, the HIA warns that it will be necessary to check these plans when they become available and also during the actual construction. It will therefore be necessary for the future detailed plans to be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies before they are approved or before any permits are issued. In the event of any deviation from the strict height limits that aspect of the project should be redesigned to comply with the height restrictions. Similarly if during actual construction any new buildings become visible work should be stopped immediately.

Concerns about this project have been voiced by local NGOs, including the Association of Dubrovnik architects; Dubrovnik branch of Association of art historians of Croatia; Initiative Srđ je naš (Srđ is ours); Udruga Placa; Zelena akcija; Society of Friends of Dubrovnik Antiquities. These organisations made representations to the Mission. The NGOs drew attention to the World Heritage Committee's decision **38 7B.25** that the State Party should provide the HIA before any development works have started and any final decision taken, but in practise the overarching planning process was continued, although no detailed plans have been approved or works started.

Oppositions to the proposals are brought on a number of grounds. The objectors say that the HIA only analyses visual factors impacting the city rather than the intrinsic value and attributes of the Srđ plateau itself. The plateau forms the hinterland of the city which provides its natural and historical landscape setting related to overland trade and caravan routes to and to the city's water supply. Most importantly the plateau has always been the 'strategic key' to the city: it comprises a 'Fortification Landscape' with remains of defensive systems dating from the prehistoric period through to the nineteenth century. This landscape has been the subject of an EU funded project. The first permanent defences were constructed by the French at Fort Imperial from 1806, followed by forts at Nuncijažata, and Žarkovica (Fort Delgorgue). These forts were part of a system which included Fort Royal on the Island of Lokrum which already lies within the inscribed property. The initial French forts were added to by the Austrians. Smaller redoubts were placed along the northern edge of the plateau and a shooting range was built south west of Bosanka village. The completed system formed a trapezoidal defensive ring around the city with all the forts in visual contact with each other. Many of these fortifications were refurbished in World War II and also played a significant role in the Siege of Dubrovnik during the armed conflict in 1991-92. The opponents of the scheme point out that the integrity of this landscape setting will be destroyed by development.

The opponents of the scheme are also concerned that the plateau is the last available open space adjacent to the walled city available for development and that the plateau's area exceeds that of the walled city many times. They maintain that only the interests of the investor in the project have been taken into account and not the interests of the existing small landowners. They question the benefit of the scheme to local inhabitants, since the publicly accessible green areas are restricted to the edge of the plateau. The opponents also believe that, although the scheme will have its own independent utility supply, it will nevertheless place a stress on existing public infrastructure and water supplies.

The NGOs criticise the lack of transparency and stakeholder involvement in the decision making process. The NGOs also challenged the legality of the planning process. This challenge has been upheld and the NGOs are claiming more irregularities in the decision

making process which will be the subject of a further legal challenge. The NGOs are also disappointed that the results of a local referendum have not been taken into account because the numbers objecting to the scheme fell below the necessary threshold.

The Mission considered the golf resort proposal in the light of all the material and arguments presented. The Mission agreed with the findings of the HIA, but noted that while the surface of the plateau is invisible from the city it is clearly visible to the many tourists who arrive by air to the city. Another aspect that does not appear to have been assessed is the impact of light-pollution on the property. Although the new development is required to be invisible by day, at night there is potential for 'light spillage' which could alter the setting of the property. Further analysis is required to ensure that although buildings are invisible during the day light pollution does not detrimentally impact the setting of the property at night. The Mission was particularly responsive to the historical significance of the Fortification Landscape of the Mount Srđ plateau and accordingly a possible future extension of the property's buffer zone to include this landscape is discussed below.

The Mission **concluded** that, due to its setting, the project is to be considered strictly from the point of view of its impact on the property and its Outstanding Universal Value. On this basis the HIA demonstrates that the proposal as currently defined, will have minimal direct impact and **recommended** that from the strict criteria of the inscription the impact on the property is acceptable. However the Mission also **recommended** that it will be necessary to check the detailed plans when they become available and also during the actual construction. The Mission also requested that no construction should be allowed within a minimum distance of 50 m from the edges of the plateau. Accordingly the detailed plans should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies before building works begin. The Mission also **recommended** that a light pollution study should be conducted as part of the HIA process.

Bosanka 2: During the course of the visit the Mission learnt of the so-called Bosanka 2 housing project which is proposed to be situated to the south-east of the existing settlement of Bosanka on the westward facing slope of Mt Srđ. This proposal intrudes into the south western side of the proposed golf resort. The proposal is apparently in accordance with the approved development plan, but the detailed plan has not yet been approved. No HIA has been conducted, but even without any scientific analysis it was immediately clear to the Mission that the proposal would have a major adverse impact on the Outstanding Universal Value and the setting of the property, since it would be highly visible. The Mission therefore **recommends** that the Bosanka 2 project is not allowed to proceed. It follows that the Mission also recommends that there should be no more new building between the line of the Adriatic road (Jadranska Magistrala) and the crest of the Srđ plateau.

Hotel Belvedere: The Hotel Belvedere occupies a prominent site to the south of the city overlooking the components of the World Heritage property: island of Lokrum and the old city itself. The building was severely damaged during armed conflict in the 1990s. The Mission members were informed that the hotel had been recently privatized. Future plans foresee the demolition of the existing building and the construction of a new facility with a reduced number of bedrooms. The Mission was briefed about potential design/facades of the replacement hotel. The Mission **recommends** that the detailed plans of the new Hotel Belvedere should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies before the building works begin. The Mission also **recommends** that a HIA of the new building should be prepared, following the *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* issued by ICOMOS in 2011.

B.1 The status of the Management Plan of the World Heritage property

The Mission received a presentation on the progress of the Management Plan from the Director of the Institute for the Restoration of Dubrovnik to whom the preparation of the plan has been delegated by the City Council with the agreement of the Ministry of Culture. The Mission welcomed the fact that initial progress was being made on the preparation of a Management Plan.

So far the main thought has been concentrated on the early and preparatory processes of the plan and on stakeholder involvement, including decision making, rather than on the content of the plan itself. The Institute has identified the expertise that members of a commission to oversee the plan preparation will require and also the appropriate members of the commission. This commission of experts with voting rights has been appointed by the City Council. The Institute has also invited expressions of interest from local NGOs and other local stakeholders, two of whom would be invited to serve as representative observers on the work of the commission. The Institute will organise training for members of the commission with the support provided by the UNESCO's Regional Bureau for Science and Culture in Europe dedicated to the preparation of the management plan. The commission's first phase of work will lead up to a tendering exercise in 2016 which will lead to the appointment of a specialist to compile the draft plan itself. The State Party may wish to invite a WHC/ICOMOS advisory mission to assist the Institute to organise a capacity-building meeting for members of the commission on management plan preparation.

The Mission welcomed the proposed stakeholder involvement in the plan but was concerned there should be a clear distribution of roles between the members, experts, local NGOs and other local stakeholders or division into sub-commissions with different status (consultative, technical, etc.). The Mission considers that the commission should have an advisory role only and that, while its members could vote on the content of the plan and its various elements, the final approval of the plan should be the responsibility of the Ministry of Culture, City of Dubrovnik in cooperation with the Conservation Department in Dubrovnik and the Directorate for the Protection of Cultural Heritage. The Mission also emphasised the need to have the preservation of the Outstanding Universal Value of the property as its starting point and that each of the items listed in paragraph 111 of the *Operational Guidelines* should be clearly addressed. The plan should clearly define the roles of the Conservation Department of the Ministry of Culture, the Dubrovnik-Neretva County, the City Administration, the Institute for the Restoration of Dubrovnik, the CSOs and citizens. The plan should also cover as wide a remit as possible, not just conservation, with clear action points and timetable and it should identify which body is responsible for the delivery of individual actions. The resources available both human and financial should also be clearly identifiable.

The Mission therefore **recommends** that the terms of the commission should be revised to:

- Establish that the role of the commission is advisory;
- Establish that approval of the plan will be the responsibility of the Ministry of Culture, City of Dubrovnik, in cooperation with the Conservation Department in Dubrovnik and the Directorate for the Protection of Cultural Heritage;
- Clarify the roles and responsibilities of members, experts, local NGOs and other local stakeholders;
- Provide for sub-commissions with clearly specified status and responsibilities;
- Require that the key objective of the commission and the Management Plan is to be preservation of the Outstanding Universal Value of the property;
- Require that the Management Plan address the items listed in paragraph 111 of the *Operational Guidelines* and define the roles of the Conservation Department of the

- Ministry of Culture, the Dubrovnik-Neretva County, the City Administration, the Institute for the Restoration of Dubrovnik, the CSOs and citizens; and
- Require that the Management Plan adopt a wide remit, including matters such as an action plan, resources (both human and financial), responsibilities and timetabling.

B.2 The status of a Tourism Strategy of the World Heritage property

The Mission welcomed the fact that a key component of the Management Plan will be a Tourism Strategy. The Mission received an initial progress report on such a Tourism Strategy which will be based on research by the University of Dubrovnik's Department of Economics and Business Economics. A number of detailed tourism studies have been carried out to define the characteristics of visitors to Dubrovnik in both the high and low seasons and further studies are planned all of which will feed into the eventual Tourism Strategy.

Over 4/5 of Dubrovnik's economy is apparently tourist dependent. Revenues from tourism have been used to subsidise the City's income. Tourism is concentrated in the summer months: 69% of tourists per year are attracted by sea and sun, while only 23% visit specifically because of the reputation of its cultural monuments. However 75% of tourists will actually visit cultural monuments and 100% will go to restaurants. When there is bad weather, and the beaches are less attractive, the old city becomes overcrowded and this problem is exacerbated by the influx of cruise ship passengers on day trips (see below).

An inevitable side effect of this tourism 'monoculture' has been the 'museumification' of the city with domestic buildings being replaced by holiday rental apartments. Out of the Dubrovnik's total population of 40,000 only about 1,500-2000 are permanent residents within the inscribed property, while a further 2,000 visitors are accommodated in apartments. Restaurants can cater for up to 4,000 covers.

The actual tourist carrying capacity of the property has never been clearly defined, but on 3 peak days in 2015 the number of visitors was 8,000, requiring coordination between the port, shipping companies, police and tourist officials. These visitor numbers are channelled into the property through its three gates and principally through the Pile Gate. Inevitably this leads to tourist blight, because over-crowding at the gates themselves and in the main thoroughfares diminishes the visitor experience.

The solutions to this problem include limiting numbers visiting the property at any one time, spreading visitors away from the most popular attractions within the property and providing other attractions outside the property. The City has attempted to diversify tourist interest points by introducing the 'Dubrovnik Card'. This card gives visitors access to multiple sites and not just the main cultural 'honey pot' attractions such as the City Walls. The Golf Resort proposal, a proposed new shopping mall at the cruise ship terminal and cultural proposals in the northern suburbs, including an aquarium and an archaeological museum are attempts to diversify the attractions available to visitors.

The Mission identified two further issues related to tourism: interpretation and safety procedures.

The Mission noted a lack of consistent historical interpretation throughout the property. It was understood that the reason for this lack was to avoid intrusive signs. This aim was laudable in itself, however the lack of on-site interpretation must limit self-guided visitors' appreciation of the property, its buffer zone and wider setting. The Management Plan could usefully address this issue and suggest solutions possibly including 'Smartphone' technology.

The second issue concerned emergency and safety procedures, since Dubrovnik region is an area of regular seismic activities. The most recent earthquakes took place in 1979, 1994 and 1995 and strong earthquakes could be expected on an average of about every 28 years. Techniques have been developed to make the restored historic monuments of the property 'earthquake proof' and disaster resilient. The Mission noted however that there does not appear to be a similar regime for safety measures for the City's inhabitants and visitors. Apparently the relevant civic authorities have identified the number of people who can safely be accommodated in the City at any one time to avoid loss of life from a major earthquake incident. It would appear that this number is largely exceeded in the peak of the tourist season. Tourists arriving by air and sea are familiar with safety briefings and hotels carry fire warnings. Given the certainty of future earthquakes in the City it would seem sensible to consider what measures could be taken to advise visitors what actions should be taken in the event of any future seismic activity, including possible evacuation procedures.

The Mission **recommends** that the Tourism Strategy section of the Management Plan attempts to define the total sustainable carrying capacity of the city taking into account emergency evacuation plans as well.

The Mission also **recommends** that a Risk-Preparedness Action Plan, which includes specific measures related to earthquake threats and safety measures should be developed as a part of the Management Plan.

The Mission **recommends** that one action in the Management Plan should be the identification of an unobtrusive interpretation strategy, possibly including new technologies such as employing smart phone technology.

C. The status of the legal regulations of cruise ship tourism

Concerns expressed by the NGO Srđ je naš about the impact of cruise ship tourism on the property was one the two initial reasons for the Reactive Monitoring Mission to take place. The NGO focused its concern on pollution, safety and the impact on the Island of Lokrum. The Mission was able to examine this issue by means of presentations by the University of Dubrovnik's Department of Economics and Business Economics and the Dubrovnik Port Authority. The Mission also visited the two port areas.

Dubrovnik is the second most popular cruise destination in the Mediterranean after Venice. Approximately one million cruise tourists visit the property annually. The cruising season is short: 90% of the visits taking place May-October. Although these visitors represent only a small proportion of total visitors (2.5% in 2013), they have a disproportionate impact on the World Heritage property due to their concentration in time and space. Their destination is the Old City and their time is strictly limited: most cruise ships arrive in the early morning and stay for less than 17 hours. It is estimated that up to 3,813 cruise passengers visit the Old City during a four hour morning visit cruise. Since anchorages and berths are booked up to 3 years in advance it is comparatively easy to predict numbers of future arrivals.

Cruise ships have a choice of unloading at one of two ports: the City/Old Port which is currently controlled by the County; or the Port of Gruž, 3.5 km north of the city, which is controlled by the Dubrovnik Port Authority. Ships unloading at the Old Port anchor in the channel between Island of Lokrum and the mainland and then transfer passengers by tender to the Old Port. The channel is comparatively narrow and there have been collision and pollution incidents, in addition the largest ships mooring here can dominate views of the setting of the property. The recent trend is for smaller cruise ships of up to 1,000 passengers to moor here. The loading and unloading of passengers at the Old Port can

cause congestion as the Old Port is also used by excursion boats to Lokrum and the vicinity.

New cruise quays were completed at the Port of Gruž between 2009 and 2011 which now total 1,200m in length and which can handle the largest ships. Cruise visitors arrive increasingly in mega cruise ships with up to 5,600 beds and up to 18 stories high. The figures provided by the port authorities, showed that the enlargement of the capacity of the port of Gruž had directly led to a constant decrease in the number of the passengers arriving at the Old Port. Port fees are higher at Gruž than the Old Port, but it is safer, easier and quicker to unload passengers directly on shore and then transfer them by coach to the property, rather than transferring by passengers by costly tenders. In addition after the *Costa Concordia* incident the largest ships prefer to keep clear of the narrow channel adjacent to Lokrum for safety reasons.

The number of cruise visitors seem to have peaked in 2013 at 1,086,925 (553 ships at Gruž and 139 at the Old Port) and in 2015 is projected to be 816,817 (478 ships at Gruž and 128 at the Old Port). The usual maximum number of passengers received on any one day is 8000, but can rise to 10,000. These numbers require The Port Authority to coordinate closely with the other civic authorities. The Port Authority analysed that the number of visitors and ships will stabilise at around the current numbers. This stabilisation of numbers is dictated by the maximum berthing capacity at the cruiser terminal at Gruž, but also reflects restrictions on the numbers of cruise ships at Venice. The Port Authority is about to build a new cruise terminal at Gruž with a shopping mall, tourist and local bus stations and a proposed cable car link to the northern slope of Mt Srđ. There is also a proposal for a water bus service from Gruž to the old port.

A significant future development may be the transfer of the management of the Old Port to the City who may then amalgamate operations with the Port Authority. The Mission welcomed the possibility of this amalgamation, since a single port authority would allow much better coordination of the schedule of ships and passengers. The Mission also supports the suggestion in the Tourism Study that the Port of Gruž and the Old Port should aim at an even distribution of annual, weekly and daily calls/arrival times/length of stay in port. There should be a clear definition of the maximum size of ships that can be moored at Lokrum and, if possible these should be limited to the smallest size feasible. Berthing at Gruž should always be preferred.

The Mission **recommends** that the issue of cruise ship tourism and its future management should continue to be a key element of the forthcoming Management Plan, and should be supported through appropriate legislation, as necessary. The maximum number of cruise ship tourists also be addressed in the Management Plan and should be defined following further analysis having regard to the sustainable carrying capacity of the city and emergency evacuation requirements, but should not exceed 8,000 tourists per day.

The Mission **recommends** the introduction of a legal Act which limits, or prohibits, the passage and mooring of boats, ships and yachts (except the passage of small boats transporting the visitors to the Lokrum island) in the coastal area between the old city and Lokrum island, in accordance with the newly proposed correction of the boundaries and extension of the buffer zone.

D. The status of supervision mechanisms of all components of the property

There are currently a number of bodies at national and local level all of whom have differing roles in supervising the protection, conservation and management of the property. To assist in the implementation of the Management Plan the Mission

recommends that a specific Manager for the property, who reports to the City of Dubrovnik, should be appointed to coordinate, implement and oversee the plan and to act as a focal point for all World Heritage issues.

E. Progress in the establishment of measures to strengthen monitoring and management of the property

In addition to the issues mentioned in section B.1 above, a major extension to the buffer zone (referred to in translated documentation as the 'contact zone') of the property is proposed by the County Institute for Spatial Planning. The Mission examined this proposal and it identified four distinct elements to the proposed extension:

- West facing slopes of Mount Srđ;
- Sea around the island of Lokrum;
- Fortification landscape on the Srđ plateau; and
- Summer/Country Villa landscape.

The west facing slopes of Mt Srđ: The steep slopes of Mt Srđ provide a dramatic backdrop to the property. The slopes were once wooded with oak and cypress trees; however much of the slope is now bare hillside, particularly at its southern end. At the crest of the slope and immediately overlooking the property is Fort Imperial with its serpentine pedestrian access leading up from the City. Further along the crest to the south is the historic shooting range near Bosanka, while Fort Žarkovica (Fort Delgorgue) marks the southern end of the crest. Fort Imperial and Fort Žarkovica (Fort Delgorgue) belong to the same system as Fort Royal on the island of Lokrum which is already inscribed. There are a number of modern intrusions on the slopes which predate the inscription of the property including: the Adriatic Highway, D68/E65, completed in 1965 with its highly visible concrete retaining walls towards the south; a transmitter mast built in the 1960s within the historic structure of Fort Imperial which is highly illuminated at night, (planned to be moved as part of the restoration of Fort Imperial); a cable car built in 1969 and restored in 2010 which carries 400,000 passengers each year and has a highly visible supporting mast and modern top terminal illuminated at night. On the Adriatic Highway the portal of a tunnel bringing cables from the Dubrovnik hydro-electric plant has only recently been completed. This portal's retaining walls are unscreened and highly visible from the property; it is also highly illuminated at night. Below the Adriatic Highway there is suburban domestic and hotel development built dating from the 1960s onwards, including the war damaged Hotel Belvedere, which is awaiting replacement.

Despite modern intrusions the Mission considers the slopes of Mt Srđ as vital to the setting of the World Heritage property and therefore **recommends** that the State Party should consider developing a minor boundary modification proposal with a view to extending the buffer zone by including the entire west facing slope of Mt Srđ that is visible from the World Heritage property. The Mission further **recommends** that no further new building should be allowed in this zone and that consideration should be given to attempting to screen the modern intrusions.

Sea around the Island of Lokrum: The World Heritage property is composed of the Old City of Dubrovnik inscribed on the World Heritage List in 1979, and the components outside the city walls, including the Pile medieval industrial suburb, the Lovrijenac Fortress, located on a cliff, the Lazaretto, the Kaše breakwater, the Revelin Fortress and the island of Lokrum situated to the south-east of Dubrovnik, some 500m from the coast.

The Mission considered that the extension of the buffer zone to cover the channel between the mainland coastal area and the island is highly advisable. The Mission further considered that the westward facing shoreline of the island should also be included in the above-mentioned minor boundary modification proposal. The Mission therefore

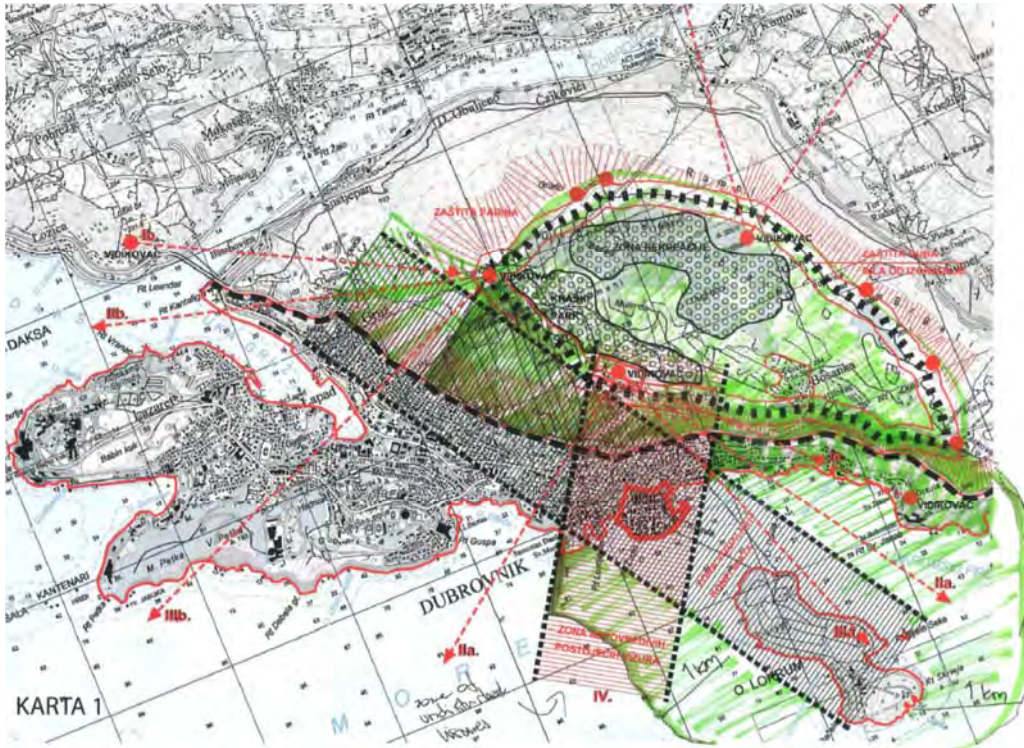
recommends that the State Party should consider a minor boundary modification proposal to extend the buffer zone to cover all the open water between the Island of Lokrum and the and approximately 1 km around the southern, western and northern sides of the island to connect with the existing boundary of the northern buffer zone and the proposed extension of the buffer to include the west facing slope of Mt Srđ.

Fortress Landscape of the Mt Srđ Plateau: The importance of this landscape is described above in the discussion of the proposed golf resort. Since this landscape is directly related to the fortifications on the crest of Mt Srđ it would be logical to extend the buffer zone to include this landscape. If this area were to be in the buffer zone the detailed planning of the golf resort would have to take this into account so, for instance, it would be important to retain visual sight lines between contemporaneous fortification structures. By placing this area within the buffer zone it would help to retain adequate control not only of the detail of the golf resort itself, but any other subsequent development proposal. The Mission **recommends** that the above-mentioned minor boundary modification proposal includes the extension of the buffer zone to cover Fortress Landscape of the Mt Srđ Plateau.

Summer/Country Villa landscape: The Mission visited the restored Bunić-Kaboga and Sorkočević summer villas which belonged to the extensive group of summer residences which were established in the Dubrovnik area from Slano to Cavtat from the fifteenth century onwards. These villas were particularly built in Gruž and along the banks of the River Ombla, but here the setting of these villas has been heavily compromised by the coast road built in 1963, urban, commercial and marina developments, and the 2002 Dr Franjo Tuđman Bridge. Further proposed developments include the new cruise terminal and shopping mall and a potential 300m tunnel through gardens of the summer villas which now front onto Obala Stjepana Radića, south of Gruž market. The Mission was less convinced by this element of the proposed buffer zone extension in view of the degradation of the setting of these villas and therefore concluded that this area does not warrant consideration for inclusion within the minor boundary modification proposal.

General recommendation on boundary issues

Taking into account that the State Party already envisages proceeding with the creation of a new buffer zone for the property, based on the analysis of values, such as landscape valorisation and the proposal for the designation of a Fortification Landscape above the property (letter of 4 December 2014 by the Head of the Physical Planning Institute of Dubrovnik), the Mission **recommends** that the State Party considers the development and submission to the World Heritage Centre of a minor boundary modification proposal for an extension of the buffer zone to include the west facing slopes of Mt Srđ, the sea area around the Island of Lokrum and the fortress landscape of the Srđ plateau. This issue was discussed in details between the Mission team and authorities. A map illustrating a possible delimitation discussed is attached below.



F. Legal framework.

The Mission was informed that the existing legal frameworks in Croatia do not recognize the Management Plan as the framework document, ensuring adequate management and preservation of OUV of the property, to be taken into consideration and respected when new urban planning documents are being drafted or the existing one is being adjusted. Apparently, the same situation applies when large scale conservation plans and programmes are being prepared. However the representatives of the Ministry informed the Mission that a new law is being drafted which will acknowledge the Management Plan as an officially recognized planning document.

The Mission **recommends** that the State Party reviews its cultural heritage and planning legislation at national and local levels to ensure that World Heritage site inscription and World Heritage Site Management Plans are fully recognised in such legislation in order that the Outstanding Universal Value of Dubrovnik and other Croatian inscribed properties can be assured of future protection and management.

CONCLUSIONS AND RECOMMENDATIONS

By decision of the World Heritage Committee at its the 38th session (Decision **38 COM 7B.25**, Doha, 2014), the State Party was requested to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to assess current conditions at the property, including the evaluation of potential developments impacts and identify options for development proposals in accordance to the OUV of the property, especially in regard to the large project planned for the plateau of Mount Srđ and Bosanka in the vicinity of the World Heritage.

The primarily objective of the mission was to review the overall state of conservation of all components of the property as well as progress made in the implementation of the Committee's decision **38 COM 7B.25**.

The Mission included an extensive visit of the inscribed property, including the City Walls and other key sites and buildings. These visits allowed the Mission to view post-1979 earthquake and post-1991/92 siege restoration projects, together with planned and potential new projects. The Mission was impressed by the extensive documentation, excavation, restoration and conservation programmes and projects conducted by the Government of the Republic of Croatia, the Institute for the Restoration of Dubrovnik and the Association of Friends of Dubrovnik Antiquities.

The Mission identified five major restoration/interventions and one new construction projects worthy of note within the perimeter of the core zone, namely: the City Walls; the so-called Pustijerna Site; the Orlando Column; air conditioning units; the Historic Sewage system; and a possible landing stage adjacent to the Lazaretto.

Two major projects planned to be implemented within the buffer zone of the World Heritage property, were identified and examined, namely: a possible northern pedestrian zone and possible tunnel from port of Gruž with a southern terminal possibly in the north buffer zone.

Finally, the mission reviewed major new restoration or construction projects in the vicinity of the World Heritage property which could affect its Outstanding Universal Value. These projects are : Sports and Recreation Centre with a golf course and the Bosanka North and Bosanka South Tourist Resorts, new "Bosanka 2" settlement and preliminary plans for recently privatized Hotel Belvedere.

The Mission received a presentation on the progress of the Management Plan and welcomed the initial progress that was being made on the preparation of a Management Plan. As an integral part of the Management Plan the Tourism Strategy of the World Heritage property as well as the status of the legal regulations of cruise ship tourism.

The mission also underlined necessity for establishment of supervision mechanisms and the measures to strengthen monitoring and management of the property.

The following conclusions are made and recommendations are proposed:

Conclusions:

- The State Party has not yet finalized the retrospective Statement of Outstanding Universal Value (RSOUV) in accordance with the last revision made by ICOMOS at the end of 2014.

- The buffer zone should be enlarged to ensure more consistent protection of the property.
- No Management Plan is in place yet, but is in the process of preparation.
- The slopes of Mt Srđ are vital to the setting of the World Heritage property and its western slopes should be included into the buffer zone with no further construction to be allowed.
- Procedures for the implementation of the works by the Association of Friends of Dubrovnik Antiquities are not ensuring use of adequate materials and methods for conservation, restoration and maintenance works.
- With regard to the development projects of Sports and Recreation Centre with a golf course and the Bosanka North and Bosanka South Tourist Resorts, the Mission, having assessed the possible impact of the project on the property on the basis of the criteria at the time of inscription, considered it as acceptable.
- The Orlando column is in need for urgent safeguarding and required measures are to be undertaken promptly.
- The extension of the port of Gruz, has considerably decreased passengers figures to the Old Port, but further measures to ensure adequate management of cruise ship visitors to the Old Port are to be explored.
- The position of the Conservation Department of the Ministry of Culture, in regard to the plans to construct the Lazeretto; Quay/Landing Stage with connection to the Old Port are endorsed.
- The existing legal framework of the Republic of Croatia does not recognize the Management Plan as the framework document, ensuring adequate management and preservation of the Outstanding Universal Value of the property.

Recommendations

- The retrospective Statement of Outstanding Universal Value should be finalized as a matter of priority, and submitted to the World Heritage Centre for its adoption by the World Heritage Committee, since it provides a fundamental basis for assessing impacts of the various proposals and projects that have been considered by the Mission.
- The State Party should prepare a minor boundary modification proposal, with revisions of the buffer zone to ensure a more consistent protection of the property.
- The State Party should ensure prompt finalization and approval of the Management Plan for the property, which is to define clear procedures for methods for conservation, restoration and maintenance works, especially in relation to the materials being used, as well in the relation to the management of tourists, with special emphasis to be given to regulations of cruise ship tourism.
- With regard to the Pustijerna Archaeological Site, before undertaking any activities the Plans developed along with required the details should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies.

- The “Bosanka 2” project should not be allowed to proceed.
- A light-pollution study of the Bosanka North and Bosanka South Tourist Resorts should be included as part of the Heritage Impact Assessment process.
- The plans to construct the Lazeretto; Quay/Landing Stage with connection to the Old Port should be stopped and the no construction should be permitted in this area.
- In the event of the northern tunnel proposal being carried forward a full Heritage Impact Assessment should be undertaken in accordance with the *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* issued by ICOMOS in 2011, and the project details, including the HIA, should be submitted to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines* for review by the Advisory Bodies.
- The Tourism Strategy section of the Management Plan should define the total sustainable carrying capacity of the city, which should not exceed 8,000 tourists per day, also taking into account the emergency evacuation plan.
- A Risk-Preparedness Action Plan, which includes specific measures related to earthquake threats, should be developed as a part of the Management Plan.
- An action in the Management Plan should be the identification of an unobtrusive interpretation strategy, including new technologies such as employing smart phone technology.
- There should be a legal Act which limits, or prohibits, the passage and mooring of boats, ships and yachts (except the passage of small boats transporting the visitors to the Lokrum island) in the coastal area between the old city and Lokrum island, in accordance with the proposed revision of the boundaries and extension of the buffer zone.

ANNEXE I. Terms of Reference

TERMS OF REFERENCE

Joint UNESCO/ICOMOS reactive monitoring mission to Old City of Dubrovnik (Croatia) 27 October – 1 November 2015

The World Heritage property of the Old City of Dubrovnik was inscribed on the World Heritage List in 1979 under cultural criteria (i), (iii) and (iv) and extended in 1994.

This property includes the Old City of Dubrovnik (property component 24.7 ha and its buffer zone: 53.7 ha) inscribed in 1979 and the Lokrum Island (property component: 72 ha) inscribed as an extension in 1994.

At its 38th session (**Decision 38 COM 7B.25**, Doha, 2014) the Committee took note of the information submitted by the State Party regarding the large project planned for the plateau of Mount Srđ and Bosanka in the vicinity of the World Heritage property and requested the State Party to provide the project documentation and the respective heritage impact assessment (HIA), in line with Paragraph 172 of the Operational Guidelines, before any development works have started and any final decision has been taken. The Committee further requested the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property to assess current conditions at the property, including the evaluation of potential developments impacts and identify options for development proposals in accordance to the OUV of the property.

In line with this decision, the objective of the monitoring mission is to review the overall state of conservation of all components of the property as well as progress in the implementation of the Committee's decision **38 COM 7B.25**.

In particular, the mission should review and assess the following key issues:

- a) The status of any intention to undertake or to authorize major restoration or new construction projects within the World Heritage property, its buffer zone, or in the vicinity of the property, which could impact adversely on its Outstanding Universal Value;
- b) The status of the Management Plan of the property and its implementation, including supervision mechanisms for all components of the property;
- c) The effectiveness of development control mechanisms;
- d) Progress with the establishment of measures to strengthen monitoring
- e) The status of legal regulations and the effectiveness of the tourism strategy in relation to cruise ship tourism;
- f) Other conservation issues currently affecting the property.

The mission should hold consultations with the Croatian authorities at national and local levels and all other relevant stakeholders.

Based on the results of the above mentioned assessment and discussion with the State Party representatives, the mission team will prepare a concise mission report in English or French on the findings and recommendations of this Monitoring Mission for review by the World Heritage Committee at its 40th session (2016). The mission report will propose recommendations to the State Party and the World Heritage Committee on development proposals and on ways to further improve the conservation and management of the property. The report will follow the standard format.

ANNEXE II. Composition of mission team

UNESCO

Mrs. Anna Sidorenko
Programme Specialist
In charge of Central, Eastern, South-Eastern Europe, Italy, Israel and Holy See
Europe and North America Unit
UNESCO World Heritage Centre
7, place de Fontenoy
75352 Paris Cedex SP 07
Tel: +33 1 45 68 20 96
Fax: +33 1 45 68 55 70
e-mail: a.sidorenko@unesco.org

Mr Siniša Šešum
Head of Office
Antenna Office in Sarajevo
UNESCO Regional Bureau for
Science and Culture in Europe, Venice (Italy)
Zmaja od Bosne bb, UN House, Sarajevo (BiH)
Tel: +387 33 222 796/Fax: +387 33 222 795
E-mail: s.sesum@unesco.org

ICOMOS

Mr Tom Hassall OBE MA FSA Hon MCIfA
ICOMOS representative
ICOMOS International Secretariat
E-mail: tom@hassalls.free-online.co.uk

ANNEXE III. Examination of the property's state of conservation by the World Heritage Committee at its 3rd, 15th, 16th, 17th, 18th, 19th, 20th, 21st and 22nd sessions

22nd session of the World Heritage Committee, Kyoto, Japan, 30 Nov - 5 Dec 1998

Decision: CONF 203 VII.17

VII.17 Old City of Dubrovnik (Croatia)

On the basis of a substantive report on the state of conservation of Dubrovnik that was submitted by the Croatian authorities, ICOMOS advised that it was greatly impressed by the restoration works undertaken in Dubrovnik, and strongly supported the request made by Croatia to delete Dubrovnik from the List of World Heritage in Danger.

The Committee, following the recommendation of the Bureau, decided with great satisfaction to delete the Old City of Dubrovnik from the List of World Heritage in Danger. It congratulated the Croatian authorities for the effective measures taken for the preservation and restoration of this World Heritage site.

It encouraged the authorities to continue and to complete the excellent works of restoration and rehabilitation and to give due consideration to risk preparedness in the future planning and management of the city.

21st session of the World Heritage Committee, Naples, Italy, 1-6 December 1997

Decision: CONF 208 VII.B.26

VII.26 Old City of Dubrovnik (Croatia)

The Delegate of Croatia informed the Committee that considerable progress had been made in the reconstruction and restoration of Dubrovnik and that an expert committee would meet in January 1998 to review the state of conservation of the city and that the Croatian authorities would inform the Bureau and the Committee of its findings.

The Committee decided to defer the examination of the state of conservation of Dubrovnik and requested the Croatian authorities to submit a report on the state of conservation by 15 April 1998 for examination by the twenty-second session of the Bureau.

20th session of the World Heritage Committee, Merida, Yucatan, Mexico, 2 - 7 Dec 1996

Decision: CONF 201 VII.C.25

VII.2S Old City of Dubrovnik (Croatia)

On September 5, 1996, the area of Dubrovnik was hit by an earthquake. In response to a request from the Croatian authorities, a fact-finding mission was sent to Dubrovnik in late November to survey the effects of the earthquake. The expert mission reported that the earthquake had caused minimum damage in Dubrovnik. Only some cracks dating back to the earthquake of 1979 had deteriorated.

Very serious damage, however, was caused to the historical town of Ston, which was on the Croatian Tentative List. Inside the city walls nearly all buildings were damaged and several of them had collapsed. The Committee expressed its concern about the state of conservation of the town of Ston.

As for Dubrovnik, the Committee requested the State Party to submit, by 15 September 1997, an overall state of conservation report, in order for the Committee to consider at its twenty-first session whether Dubrovnik could be deleted from the List of World Heritage in Danger.

19th session of the World Heritage Committee, Berlin, Germany, 4 - 9 Dec 1995

Decision : CONF 203 VII.C.1.27

VII.27 Old city of Dubrovnik (Croatia)

The Committee, having taken note of the difficulties which hindered the execution of the programme for which it had approved funds in 1994, requested the Secretariat to continue monitoring its implementation and to present a progress report to the Bureau at its twentieth session. The Committee decided to retain this property on the List of World Heritage in Danger.

18th session of the World Heritage Committee, Phuket, Thailand, 12 - 17 Dec 1994

Decision: CONF 003 IX

Dubrovnik (Croatia)

The Committee was informed that the restoration of what is called the fifth facade of the city - the roofs - was almost completed and that there remained only a few insulae awaiting repairs, and that important progress had been made in the restoration of several of the most important monuments of the city.

The Committee commended the Government of Croatia and UNESCO on the progress made in the conservation and restoration of Dubrovnik. It noted, however, that after the priority needs had been taken care of, other works such as the restoration of nine destroyed palaces and details of Franciscan and Dominican cloisters needed to be undertaken. The Committee decided, therefore, to retain this site on the List of World Heritage in Danger.

17th session of the World Heritage Committee, Cartagena, Colombia, 6 - 11 Dec 1993

Decision: CONF 002 X

The Old City of Dubrovnik (Croatia)

The Secretariat recalled action undertaken by UNESCO in cooperation with Croatian specialists, and indicated that the brochures prepared jointly with the national authorities proved to be an excellent promotional support. A number of safeguarding measures had been undertaken:

- a restoration methodology had been defined;
- training courses had been organized in France and Italy for Croatian architects;
- equipment and materials had been purchased for the restoration of roofs.

The Secretariat recommended that these UNESCO activities, undertaken in liaison with the Institute for the Protection of Cultural Monuments of Dubrovnik, the Institute for the Rehabilitation of Dubrovnik and the UNESCO National Commission, should be reinforced through support under the World Heritage Fund.

At the request of the Committee at its sixteenth session, the Croatian authorities submitted a proposal for the extension of the World Heritage site. This was discussed by the Bureau at its seventeenth extraordinary session, and it was decided to defer this proposal until the Croatian authorities also submit, as requested, a proposal for a buffer zone.

16th session of the World Heritage Committee, Santa Fe, USA, 7 - 14 Dec 1992

Decision: CONF 002 VIII

Old City of Dubrovnik (Croatia) The Committee took note of the report on the state of conservation of Dubrovnik, which was inscribed on the List of World Heritage in Danger, in Carthage in 1991, and was also informed of the request received by the World Heritage Centre for the creation of a buffer zone. This request would be submitted to ICOMOS for review.

15th session of the World Heritage Committee, Carthage, Tunisia, 9 - 13 Dec 1991

Decision: CONF 002 VII

Inscription on the List of World Heritage in Danger: Dubrovnik

Special attention was given by the Committee to the dangers threatening the World Heritage sites during armed conflict. The Secretariat informed the Committee of the situation of the historical City of Dubrovnik. It also announced the decision of the Director-General to launch an international campaign for the restoration of Dubrovnik.

Aware of the fact that it represents 123 States, including Yugoslavia, which are signatories of the Convention, the Committee expressed deep concern about the armed conflict, devastating a region that comprises several sites inscribed on the World Heritage List, in particular the Old City of Dubrovnik. It decided to urge the parties in conflict to do their best to agree a ceasefire which would allow, as soon as possible, the repair of the damage already caused in the conflict zone, in particular in Dubrovnik, in response to the appeal by the Director-General of UNESCO for international solidarity.

Recalling that the repeated requests of UNESCO to observe the obligations of the Convention concerning the protection of the World Cultural and Natural Heritage had so far not been heeded, and noting the state of exceptional emergency caused by the armed conflict, the Committee decided, in accordance with the provisions of Article 11, paragraph 4 of the Convention, to inscribe Dubrovnik on the List of World Heritage in Danger and to publicize this entry immediately.

Several delegates pointed out that the decision of the Committee should not be interpreted as an act of accusation, but as the affirmation that all States Parties to the Convention are involved in a situation where a World Heritage city was being seriously damaged by an armed conflict. The observer from Yugoslavia requested that the Committee should be cautious in this action, and stressed that in view of the importance of the situation, it would be advisable to refer to all the sites inscribed on the World Heritage List, following the request of Yugoslavia.

15th session of the World Heritage Committee, Carthage, Tunisia, 9 - 13 Dec 1991

Decision : CONF 002 XV.F

Inscription on the List of World Heritage in Danger: Old City of Dubrovnik

Old City of Dubrovnik

Noting the state of exceptional emergency caused by the armed conflict, the Committee decided to inscribe the Old City of Dubrovnik on the List of World Heritage in Danger, in accordance with Article 11, paragraph 4 of the Convention.

3rd session of the World Heritage Committee, Cairo and Luxor, Egypt, 22 - 26 Oct 1979

Decision: CONF 003 XII.46

Consideration of Nominations to the World Heritage List

The Committee decided to enter in the World Heritage List the following 45 properties:

[...]

95 Old City of Dubrovnik / Yugoslavia