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Deputy permanent Delegate
Chargé of Affaires a.i.
Permanent Delegation of Croatia
UNESCO House

12 December 2022

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/EUR/22/14059

Dear Ms Genc,

I would like to acknowledge receipt of the state of conservation reports received on 28 November and 1 December, in response to the World Heritage Committee Decision **44 COM 7B.42** and **44 COM 7B.103**, concerning the World Heritage properties 'Old city of Dubrovnik' and 'Plitvice Lakes National Park' respectively, both inscribed on the World Heritage List in 1979. Please note that five of the 11 annexes to the Old city of Dubrovnik report are in Croatian. Unfortunately, they cannot be taken into consideration if they are not submitted to the World Heritage Centre in English or French, in a timely manner.

Furthermore, I am pleased to inform you that ICOMOS International has completed its Technical Review of the Management Plan 2021-2026 and the Conservation Plan for the buffer zone of the property 'Old City of Dubrovnik'.

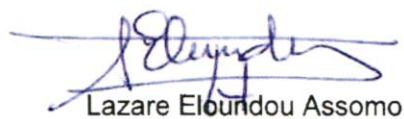
In its analysis, ICOMOS notes that the Management Plan of the 'Old City of Dubrovnik' is comprehensive, thorough and ambitious and should enable the Outstanding Universal Value of the World Heritage property to be preserved if its full potential is achieved. ICOMOS notes that, now that a year has passed, trends should begin to emerge and should be available on its first year of implementation. In this regard, the World Heritage Centre takes due note of the information included in the state of conservation report that mentions the beginning of the process of establishing a stable management structure through the organization of workshops for the election of an assembly, representatives of citizens, civil society associations and private sector for the management committee. As you will see in the technical review, ICOMOS advises that in the event that resource constraints restrict progress on the Management Plan, priority could be given to the Carrying Capacity Plan and the Risk Preparedness and Management Plan.

With regard to the Conservation Plan for the buffer zone of the World Heritage Property, ICOMOS considers that it is a thorough and well-argued document which addresses many of the concerns expressed in the report of the 2015 UNESCO/ICOMOS Reactive Monitoring mission to the Old City of Dubrovnik. The methodology takes full account of the spatial, functional, and visual interplay between the Old City of Dubrovnik and its setting. If the plan is fully adopted and implemented, ICOMOS considers that it should lead to the preservation of the visual interplay between the city, the sea and the mountain, which is a key component of the Outstanding Universal Value of the property.

I would thus be grateful if you could share the enclosed ICOMOS technical reviews (see Annex I and II) with your relevant authorities for their consideration and keep the World Heritage Centre informed of the follow-up provided to its recommendations.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely,



Lazare Eloundou Assomo
Director

Enc.: Annex I – ICOMOS technical review on the Management Plan 2021-2026 of the World Heritage property 'Old City of Dubrovnik'

Annex II – ICOMOS technical review on the Conservation Plan for the buffer zone of the World Heritage property 'Old City of Dubrovnik'

cc: Croatian Commission for UNESCO
National Focal Points for the implementation of the Convention
ICOMOS International

Annex I: ICOMOS technical review on the Management Plan 2021-2026 of the World Heritage property 'Old City of Dubrovnik' (September 2022)

ICOMOS Technical Review

Property	Old City of Dubrovnik
State Party	Croatia
Property ID	95ter
Date of inscription	1979
Criteria	(i)(iii)(iv)
Project	Management Plan 2021-2026 of the Old City of Dubrovnik

Background

On 14 January 2022, ICOMOS received the Management Plan for the Old City of Dubrovnik from the State Party, via the World Heritage Centre, in line with the latest World Heritage Committee Decision on the property (44COM 7B.42) requesting the State Party to finalize and submit the Management Plan, including Risk Assessment Plan.

The Old City of Dubrovnik was inscribed on the UNESCO World Heritage Site List in 1979. At that time there was no requirement for inscribed sites to be managed according to a formal management plan. This requirement was subsequently set out in the various editions of the *Operational Guidelines for Implementation of the World Heritage Convention*. The deficiency in the case of Dubrovnik was accordingly recognised by the State Party. The actual process of compiling a first management plan for the World Heritage property was begun in 2014 and culminated in October 2020 in the publication of the current plan covering the period 2021-2026. The plan was formally adopted by the Dubrovnik City Council in March 2021. The Advisory Body provides its analysis of the document.

Analysis

Objectives

Internationally, the Old City of Dubrovnik World Heritage property is recognised as a supreme example of a planned and fortified medieval port city situated on the Adriatic coast. Its attributes are spelt out in its Statement of Outstanding Universal Value (OUV). Nationally, the city is seen as a symbol of Croatian cultural achievements which also fulfils an administrative function. As the city's traditional role as a trading port has declined, the World Heritage property has become a magnet for almost uncontrolled and expanding tourism by land, air and sea which has only been temporarily reduced by the COVID-19 pandemic. The object of the plan, encapsulated in the plan's overarching Vision Statement with its eight strands (p.13), is to protect the property's Outstanding Universal Value, its tangible and intangible values, as well as its setting while preserving it also as a living city, while at the same time accommodating and managing the increasing demands of tourism.

Scope

The plan refers to the UNESCO's *Recommendation on the Historic Urban Landscape* (2011). It includes the late medieval core of the inscribed Old City with its harmonious buildings of various dates and styles and its historic infrastructure, together with Pile suburb and the island of Lokrum; the buffer zone of which was extended in 2018 following a recommendation of the 2015 UNESCO/ ICOMOS Reactive Monitoring mission to the city and now includes the visible slopes and ridge of Mt. Srđ as far north as the port of Gruž and as

far south as the Belvedere Hotel all of which are visually integral with the city's historic urban landscape; and thirdly, and importantly, the entire, wider natural setting of the city, including the numerous associated summer villas. The contents of the plan (see below) cover all aspects of the legal, social, economic, tangible and intangible cultural and natural life of the city with no obvious omissions. The scope of the Management Plan is therefore hugely ambitious.

Authorship

The authorship and coordination of the plan was entrusted to the Institute for the Restoration of Dubrovnik [Zavod za obnovu Dubrovnika] (ZOD). ZOD was established in 1979 (Appendix V.1.), following a major earthquake, and the organisation has played a major role in the restoration of the city's historic buildings, particularly those damaged during the 1991-1995 War of Independence. ZOD is organised by a Management Committee consisting of a Management Board and an Executive Board, details of the unpaid membership of both boards are given, but there is no information on the Institute's executive structure or its financial structure. In compiling the Management Plan, ZOD is responsible to a Management Plan Development and Monitoring Board, representing the interests of the key national, regional and local stakeholders. The names of the individual contributors of the plan are given in Appendix V.7 and authors of each published section of the plan are credited in the Impressum.

Process

A very inclusive and thorough participatory process was initiated in order to have the widest possible representation in the planning process. A wide range of stakeholders were drawn from both the national and regional public administration and the local community, since the current management system is characterised by complex relations between various stakeholders and jurisdictions while some other stakeholders have been insufficiently involved. 5 key stakeholders were identified to have a place on a Management Development Plan Board and a further 13 stakeholders were appointed to an Executive Board. In addition to board membership citizen assemblies, workshops and focus group meetings were held. Tourists and visitors were also considered as indirect stakeholders.

This participatory process allowed for both the identification of all the challenges and issues that characterise the management of the World Heritage property, and for agreement on the necessary actions and priorities.

Issues

The Management Plan analyses in detail the issues and problems that need to be addressed if the Outstanding Universal Value of the World Heritage property is to be preserved and the city itself continues to be a living city. A list of challenges is identified (p.61).

The available legal instruments and institutions for the protection of the cultural and natural environment are explained at length. Inevitably the requirements of the World Heritage property are not yet fully integrated into this legislation and shortcomings are identified which once rectified would be of benefit to all of Croatia's World Heritage properties.

The various levels of strategic, spatial, regional and local planning regimes are also described, their applicability to the World Heritage property discussed and again their

shortcomings identified. The management of the property is complicated by the lack of: coherent planning instruments and protocols; an overarching database; and an understanding of the World Heritage property by the local community and buy-in to its management. The solution is seen as an integrated database and spatial plan and monitoring system for the World Heritage property and a unified protocol for conducting Heritage Impact Assessments.

Management challenges include past and present risks such as earthquakes, floods, fire and armed attack, and the ever-present issue of climate change. The solution is identified as disaster preparedness and recovery planning, as recommended by the 2015 UNESCO/ ICOMOS Reactive Monitoring mission to the city.

A particular issue is the growth of the tourism sector which conflicts with civil society's aspirations and overloads the city's infrastructure. In 2020, the annual overnight bed occupancy was 39,000 while the cruise terminal at Gruž which has been handling 735,000 passengers a year who have to be transported to the city, who spend comparatively little and whose dwell time is compressed. The long-term effects of the COVID-19 pandemic on visitor numbers are not yet clear, but the trajectory of visitor numbers has been rising inexorably in recent decades. The plan recognises that "in order to maximise the positive effects of tourism and minimise the negative ones, planned, coordinated, monitored, controlled and sustainable tourism development is necessary."

The adverse effects of tourism can be seen clearly in the Old City where the centre is being hollowed out with the diminishing residential areas confined to the back areas (Fig. 2), tourist accommodation units are ubiquitous (Fig. on p.87), much of the infrastructure is old and there is a lack of facilities and services. The remaining population is ageing, neighbourliness is declining and the young are priced out of the property market by gentrification. If this trajectory continues the Old City will cease to be a living city.

Actions

In order to address the issues, 6 groups of Strategic Actions are identified (World Heritage Site Management and Capacity building; Protection, Preservation and Maintenance; Sustainable Development; Tourism Management; Traffic Management; Risk Management). Underlying all the Strategic Actions are two further cross cutting horizontal themes of Digitalisation and Green Transition, along with climate change adaptation which themes are of general interest to the European Union.

Under each of the Strategic Actions one or more Objectives are proposed making a total of 12 objectives in all. In order to achieve these Objectives a series of detailed Actions are then put forward. These Actions range from the very specific and essential e.g. Action 1.1 – Adjust the legal structure of ZOD in order to fulfil its management role, to the much more general and desirable e.g. Action 1.2 Establishment of World Heritage Dialogue.

So many Objectives and Actions are proposed that it is beyond the scope of this review to rehearse and comment on them all. However, some stand out, for example:

Action 3.2: Preparation of an Urban Development Plan for the World Heritage area with a detailed breakdown. This plan would supplement existing processes and require the development of a Carrying Capacity Plan (specified in Action 10.1), a tourism strategy

(specified in 10.5), and a risk preparedness plan (specified in Action 12.1) all of which are essential for the proper and effective management of the World Heritage property.

Action 6.1: Preserve and improve the urban green and natural setting.

This action envisages the development of a Green Cadastre, which is described as 'a tool for the management of public green areas and the development of a landscape database' and 'One of the starting points for the sustainable development of the city'.

Actions 7.1-8: together aim to enhance Dubrovnik as a living city by identifying actions and financial incentives to retain the existing resident population and ideally increase it, while avoiding gentrification.

Action 11.2.: Develop a Sustainable Mobility Plan (SUMP). This plan would replace the transport section in the current Dubrovnik Master Plan. The SUMP's aims will be a decrease in traffic levels, the identification of new forms of transport, an increase in traffic safety, the reduction in greenhouse gas emissions and consumption of fossil fuels, increase the attractiveness of green spaces and a healthier environment. Issues of parking will also be examined including more residents parking and possible underground car parks.

Action 12.1.: Develop a Risk Preparedness and Management Plan for the World Heritage Site. In 2018, a Major Accident and Risk Assessment for the city of Dubrovnik was adopted but this will be supplemented by a fully comprehensive Risk Preparedness and Management Plan based on advice from UNESCO, ICOMOS and ICCROM. It will identify and evaluate emergency exits and determine the evacuation plan. The plan will also take into account risks caused by climate change.

Priorities

The Objectives and Actions are tabulated in the Action Plan which connects the 12 Objectives and their consequential Actions with the management capacities of the institutions who are responsible for delivery of the individual components. The Objectives and Actions have been prioritised by stakeholders into 3 levels: high (I), moderate (II), and long term (III) and presented in the form of a matrix.

Delivery

For each activity, the bodies responsible for implementation have been identified. All the Actions were due to start in either 2021 or 2022.

The Institute for the Restoration of Dubrovnik (ZOD) has been identified as the paramount body responsible for coordinating and delivering the Objectives and Actions of the Management Plan. In order to fulfil this role its legal structure will be (or perhaps has been) adjusted to give it the authority to act as the coordinating body. Its functions will also be upgraded so that it can provide 'a framework for cultural heritage protection through spatial and physical planning documentation'.

Many other named institutions will be responsible for the delivery of the individual Actions listed in the plan, including the Croatian Ministry of Culture and Media and its Conservation Department in Dubrovnik, the Ministry of Physical Planning, Dubrovnik-Neretva County, the City of Dubrovnik, the Dubrovnik Tourist Board, the University of Dubrovnik, the Lokrum Reserve and other stakeholders.

The City of Dubrovnik will be ultimately responsible for the compilation of the Carrying Capacity Plan for the entire World Heritage property area, including Lokrum (Action 10.1) which will be aimed at the protection of the attributes of Outstanding Universal Value of the World Heritage property. The actual compilation will be entrusted to 'an independent body' which will carry out the expert analysis in consultation with other experts, institutions and the local community.

Resources

No compilation costs or human resource requirements are given for the Management Plan 'as is the practice with UNESCO management plans'. However, the Executive Board will develop an annual financial plan. This financial plan will reflect the realities of the participating institutions own budgets. In this regard the Action Plan is prefaced by the caveat that the programme may be subject to change 'due to unpredictability of possible sources and scale of funding during and after the COVID-19 pandemic'.

Presumably realistic budgets have been compiled for 2021 and 2022. Wherever there may be a possibility of EU funding this is flagged up. This possibility is particularly relevant to the cross cutting horizontal themes of Digitalisation and Green Transition.

Reporting and Monitoring

In addition to producing a system of regular inspections, surveys, and reporting on the state of conservation at the property, the Institute for the Restoration of Dubrovnik (ZOD) will produce an annual report and review of indicators in order to assess the progress of implementation of the plan and to agree on any adjustments that may be necessary. The annual report with its review of indicators will feed into the existing quinquennial reports. A final report at the end of the fifth year will form the foundation for a second Management Plan covering the five years following 2026.

Presumably the first year's report is available.

Conclusion

Overall, ICOMOS considers that the Old City of Dubrovnik Management Plan is extremely comprehensive, thorough and ambitious.

ICOMOS advises that a lack of information on resource availability might pose a question mark over actual deliverability. It suggests that already after one year, trends should be beginning to emerge.

However, ICOMOS notes that if the plan achieves its author's ambitions, the Outstanding Universal Value of the World Heritage property will be fully preserved.

The buffer zone and wider setting will be protected from undesirable development and is covered in the separate Conservation Plan for the buffer zone, 2020. Progress will have been made into transforming the environment of the Old City into one which is congenial to residents and visitors alike.

ICOMOS advises however, that if resource constraints restrict progress on the plan at the very least the Carrying Capacity Plan and the Risk Preparedness and Management Plan for the World Heritage property must be prioritised.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
September 2022

Annex II: ICOMOS technical review on the Conservation Plan for the buffer zone of the World Heritage property 'Old City of Dubrovnik' (September 2022)

ICOMOS Technical Review

Property	Old City of Dubrovnik
State Party	Croatia
Property ID	95ter
Date of inscription	1979
Criteria	(i)(iii)(iv)
Project	Conservation Plan for the buffer zone of the Old City of Dubrovnik

Background

On 14 January 2022, ICOMOS received the Conservation Plan for the buffer zone of the Old City of Dubrovnik from the State Party, via the World Heritage Centre.

The cultural heritage of the Old City of Dubrovnik was protected by the Republic of Croatia at a national level in 1966. In 1979, the property was inscribed on the UNESCO World Heritage List, on the basis of criteria (i), (iii) and (iv). Thereafter the Republic of Croatia became responsible for ensuring the protection and preservation of the Outstanding Universal Value of the World Heritage property and its buffer zone. Legal protection was provided by means of the Act on the Protection and Preservation of Cultural Property.

Following a recommendation by the World Heritage Centre and the Advisory Bodies that the extension of the buffer zone would facilitate 'more consistent protection', (State of conservation report, 2016), extension of the original buffer zone was approved by the World Heritage Committee in 2018 (Decision 42COM 8B.37). The buffer zone now covers a very wide area of 1,188.6 hectares. It includes most of Dubrovnik's built-up urban zone including the port of Gruž; the southern slope of Mt. Srđ which rises above the built-up area from Gruž in the west to the Hotel Belvedere in the east; and the coastal zone with the adjacent Adriatic marine zone surrounding the island of Lokrum.

Much of this much wider area was not designated under the Act on the Protection and Preservation of Cultural Property, but from 2018 onwards it became subject to the procedures set out in the *Operational Guidelines for Implementation of the World Heritage Convention* in order to protect the integrity and authenticity of the World Heritage property.

Mindful of this obligation, the Croatian Ministry of Culture and Media, Directorate for the Protection of Cultural Heritage, Conservation Departments and Inspection Sector has now coordinated and published this Conservation Plan to inform and guide the management of the buffer zone and key areas outside it.

The conservation approach taken in the plan is firmly based on the appropriate principles published by UNESCO, ICOMOS and the Council of Europe and contained in *The European Landscape Convention*, Florence 2000; *Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas*, Xi'an 2005; *Vienna Memorandum on "World Heritage and Contemporary Architecture: Managing the Historic Urban Landscape"*, Vienna 2005; *Recommendation on the Historic Urban Landscape*, Paris 2011.

The plan has been coordinated by the Croatian Ministry of Culture and Media, Directorate for the Protection of Cultural Heritage, Conservation Departments and Inspection Sector

with the support of the City of Dubrovnik. The compilation team was led by the Head of the Department.

Analysis

The Conservation Plan covers not only the buffer zone, including the marine zone, but also the Srđ plateau and the village of Bosanka. The main urban development in the plan area is concentrated in the narrow corridor between the lower southern slopes of Mt. Srđ and the sea. This area was once characterised by manors and houses set in gardens and surrounded by cultivated fields and areas of natural vegetation.

This corridor is now subject to enormous development pressure caused by the growth and demands of tourism for accommodation and its accompanying infrastructure. Much of the original matrix and character of the area has been degraded by infill.

The object of the Conservation Plan is to prevent such negative impacts on the authenticity and integrity of the World Heritage property in the future. The plan aims to preserve the significant individual attributes of the buffer zone itself, but also importantly to ensure the retention of the World Heritage property's wider landscape setting as viewed from both land and sea and outwards from the property itself.

The plan has been compiled following extensive consultation, desk-based research, field inspection, followed by detailed digital analysis of the results and employing GIS (Geographic Information Systems).

The preliminary research has traced the development of each element of the landscape setting of Dubrovnik as it progressed from medieval town, to Renaissance garden town, to 19th-century garden town, and finally to the modern city. Specific elements which are described in detail include the natural landscape; relief and hydrology; vegetation; archaeology; and architectural forms. 'Degrading' features, such as the electrical substation on the Adriatic Road, are also examined. The built-up urban area was defined by specific attributes, for instance port, commerce, domestic buildings, tourism, fortifications etc. all set against the backdrop of the southern slopes of Mt. Srđ. In all 23 types of specific urban/landscape patterns are identified, described and illustrated as well as 7 types outside the buffer zone.

Building on this extensive preliminary research the plan then divides up the study area into 51 Areas of Common Features (ACF) based on common criteria. Each of these ACFs has been assessed to possess a common cultural and/or natural character and to be made up of similar components. The character-assessment process followed the European Landscape Convention of the Council of Europe and also takes account of previous studies of Dubrovnik's cultural and natural landscapes. Each of the ACF's attributes is described in detail.

In addition to identifying each of the ACF's attributes and degrading features the degree of sensitivity of each ACF has been assessed. Visual impacts and sensitivity assessments have been made using Heritage Impact Assessment tools and methods. The visibility assessment process involved identifying key viewpoints within the World Heritage property looking outwards and other viewpoints within the ACFs looking inwards. The contribution of each ACF to the integrity and authenticity of the property was similarly assessed and ranked. Pressures and threats were subject to the same process. The process allowed the total

positive or negative contribution of each individual ACF to the Outstanding Universal Value of the World Heritage property to be assessed and ranked and the information presented in tabular form and on maps. The process also identified where new constructions or changes to the urban pattern or infrastructure might be allowable without having a negative impact on the Outstanding Universal Value of the property.

The results and recommendations of the Conservation Plan will feed into the relevant regional and local spatial planning documents, thus supplementing the existing protection of the Outstanding Universal Value afforded by World Heritage inscription and the Register of Cultural Properties of the Republic of Croatia.

Conclusion

ICOMOS considers that the Conservation Plan is a thorough and well-argued document which addresses many of the concerns expressed in the 2015 Report of the UNESCO/ICOMOS Reactive Monitoring mission to the Old City of Dubrovnik, with regard to the setting of the World Heritage property. The detailed methodology applied is appropriate, since it suits the heterogeneous and multi-layered character of the buffer zone and its adjacent area. The methodology takes full account of the spatial, functional and visual interplay between the World Heritage property and its setting. The thoroughness of the research and its appropriate presentation, in tables, photographs and maps provide confidence in the detailed conclusions. If the plan is fully adopted and implemented, the approach taken will allow appropriate and well-informed decisions on proposed new interventions to be made in the future. It should prevent further negative impacts on the area of historical expansion between the city and the Srđ massif, while suggesting alternatives where appropriate. The plan should lead to the preservation of the visual interplay between the city, the sea and the mountain which is a key component of the Outstanding Universal Value.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
September 2022