



WORLD HERITAGE PROPERTY
OF THE ANCIENT CITY OF
NESSEBAR, BULGARIA

Advisory Mission Report

26 November – 3 December 2017



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Nessebar, 26 November – 3 December 2017

Joint Mission of:

UNESCO WORLD HERITAGE CENTRE – ICOMOS ADVISORY MISSION FOR THE WORLD HERITAGE PROPERTY OF THE ANCIENT CITY OF NESSEBAR (BULGARIA)

UNESCO SCIENTIFIC AND TECHNICAL ADVISORY BODY (STAB) TO THE 2001 CONVENTION ON THE PROTECTION OF THE UNDERWATER CULTURAL HERITAGE MISSION TO THE UNDERWATER CULTURAL HERITAGE OF THE ANCIENT CITY OF NESSEBAR (BULGARIA)

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1.0 NON-TECHNICAL SUMMARY

This report contains the findings of a joint Advisory Mission to the Ancient City of Nessebar, Bulgaria, that took place 26 November – 3 December 2017. It was carried out by a team representing both the UNESCO World Heritage Centre/ICOMOS with regard to the World Heritage Convention, and the UNESCO Scientific and Technical Advisory Body (STAB) to the 2001 Convention on the Protection of the Underwater Cultural Heritage. While the mission team visited locations across the World Heritage property to assess the current state of conservation and understand the positive or negative impacts that a range of development projects might be having on the Outstanding Universal Value (OUV), a particular emphasis was placed on Nessebar's underwater cultural heritage.

The mission team concluded that the World Heritage property The Ancient City of Nessebar retains the key attributes that underpin its Outstanding Universal Value (OUV). There has been significant recent progress to protect the OUV of the property and to reverse negative impacts that took place in the past.

However, the OUV of the property remains threatened by inappropriate development, inadequate resourcing and institutional support, and particularly the absence of a Management Plan. There are changes taking place at the property which have not been thoroughly assessed in advance in order to understand and respond to potential heritage impacts. The major current threat to the integrity and authenticity of the property arises from current and potential future projects, including port projects, and the absence, to date, of a rigorous process of Heritage Impact Assessment, which can inform project decision-making, design, implementation and mitigation measures. Those responsible for the property should adopt a new working procedure that reviews all potential change. This should include a values-based assessment and then decision-making that seeks to reinforce OUV and other heritage values, including in particular consideration of underwater cultural heritage.

The following mission report includes a series of recommendations which seek to address the conclusions of the mission, in the context of previous Decisions by the World Heritage Committee and the findings and recommendations from three previous missions. These recommendations encompass:

- a. pursuing urgently the finalisation, adoption and implementation of the Management Plan through a staged approach;
- b. overcoming the lack of progress and agreement in management and urban planning for the property, its buffer zone and setting to enable appropriate regulations in management and urban planning for the property, its buffer zone and setting to enable appropriate regulations;
- c. implementing a thorough and comprehensive Heritage Impact Assessment (HIA) framework in accordance with the 2011 *ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*;
- d. undertaking an HIA for any existing or future development projects;
- e. consider proposing a minor boundary modification to include the underwater cultural heritage found in the buffer zone within the World Heritage property;
- f. continuing efforts to support the removal of illegal additions to buildings and to improving the urban environment;
- g. mapping and monitoring the decay of the historic buildings and their decorative features;
- h. securing funding for more extensive conservation interventions;
- i. encouraging the local community to remain resident within the peninsula;
- j. exploring how heritage might be used to revitalize local craft traditions and support sustainable development;

- k. encouraging traditional livelihoods, knowledge systems and uses of spaces within the old town;
- l. monitoring erosion of the Nessebar peninsula to ensure that the form of the peninsula is preserved;
- m. undertaking surveys and assessments, and archaeological supervision for works that may affect underwater heritage;
- n. establishing a national action plan for the implementation of the 2001 Convention on the Protection of the Underwater Cultural Heritage;
- o. reinforcing and expanding the research programme for the underwater cultural heritage of the Ancient City of Nessebar, as an integral part of developing the national inventory of underwater cultural heritage;
- p. launching a feasibility study on the underwater archaeological sites to explore how to make them accessible to the public through 'maritime archaeological routes' and pursuing other interpretation initiatives;
- q. implementing a digitalization programme and conservation assessment for maritime graffiti in the Nessebar churches;
- r. establishing a capacity-building programme in cooperation with UNESCO and its partners to improve the identification, evaluation, research and protection of underwater cultural heritage;
- s. seeking feedback from participants on training and determining further training needs; and
- t. organising training on other issues related to the requirements of managing a World Heritage property and underwater cultural heritage.

2.0 BACKGROUND TO THE MISSION

The Ancient City of Nessebar was inscribed onto the World Heritage List in 1983 on the basis of criteria (iii) and (iv). The retrospective Statement of Outstanding Universal Value, which was adopted in 2010 and formed the basis for discussion throughout the mission, is as follows:

The Ancient city of Nessebar is a unique example of a synthesis of the centuries-old human activities in the sphere of culture; it is a location where numerous civilizations have left tangible traces in single homogeneous whole, which harmoniously fit in with nature. The different stages of development of its wooden houses reflect the stages of development of the architectural style on the Balkans and in the entire East Mediterranean region. The urban structure contains elements from the second millennium BC, from Ancient Times and the Medieval period.

The medieval religious architecture, modified by the imposition of the traditional Byzantine forms, illustrates ornamental ceramics art, the characteristic painted decoration for this age. The town has served for over thousands of years as remarkable spiritual hearth of Christian culture.

Criterion (iii): The Ancient City of Nessebar is an outstanding testimony of multilayered cultural and historical heritage. It is a place where many civilizations left their tangible traces: archaeological structures from the Second millennium BC, a Greek Black Sea colony with surviving remains of fortifications, a Hellenistic villa and religious buildings from the Antiquity, seven preserved churches from the Middle Ages. Nessebar has demonstrated its historical importance as a frontier city on numerous occasions. Having been a remarkable spiritual centre of Christianity for a thousand years, today it is a developing and vibrant urban organism.

Criterion (iv): The Ancient City of Nessebar is a unique example of an architectural ensemble with preserved Bulgarian Renaissance structure, and forms a harmonious homogenous entity with the outstanding natural configuration of the rocky peninsular, linked with the continent by a long narrow stretch of land. Its nature and existence is a result of synthesis of long-term human activity, which has witnessed significant historic periods – an urban structure with elements from 2nd millennium BC, classical antiquity, and the Middle Ages; the development of medieval religious architecture with rich plastic and polychrome decoration on its facades in the form of ceramic ornamentation typical for the period; the different stages in the development of the characteristic wooden houses, which testify to the supreme mastery of the architecture of the Balkans as well as the East Mediterranean region. The vernacular architecture of the urban ensemble, dominated by medieval churches and archaeology, together with the unique coastal relief, combine to produce an urban fabric of the high quality.

Over the last decade, ongoing concern has been expressed about the state of conservation of the Ancient City of Nessebar, both in terms of the need to protect physical fabric, as well as the need to preserve the sense of place in the context of increasing tourism, commercial and development pressures. The World Heritage Committee has noted the potential risk of the property being placed on the List of World Heritage in Danger. As part of ongoing collaborative dialogue with the State Party, ICOMOS has been involved in a number of ways to help address specific concerns regarding the management of the Ancient City of Nessebar: Reactive Monitoring missions took place in 2010 and 2012; documentation regarding State of Conservation reports, the draft Management Plan, and a port development project have undergone Technical Reviews; and an Advisory mission took place in 2015. Decisions taken by the World Heritage Committee between 2010 and 2017 are provided in Annex 6. Selected extracts from the mission reports from 2010, 2012 and 2015 are provided in Annex 7.

A range of measures recommended by the World Heritage Committee and in the three mission reports are yet to be implemented, including proposed protection regimes and conservation prescriptions, the development of a detailed Master Plan and a Conservation Plan for the property and its buffer zone, and particularly the finalisation and approval of the Management Plan. The lengthy delay in finalising the Management Plan arises in part from advice from the State Party's Ministry of Finance regarding the proposed National Fund "Nessebar-World Heritage" and Value Added Tax exemption for Nessebar residents, and from the Ministry of Culture regarding the proposed separate Act for preservation and development of the Ancient City of Nessebar. There are also unresolved inconsistencies between the boundaries of the property and its buffer zone as shown in the draft Management Plan and those of the statutory protection regimes of the State Party.

The 2015 Advisory mission report acknowledges that major steps had been taken to preserve the property in compliance with the Decisions of the World Heritage Committee, but urges that particular attention should be given to the adoption and implementation of the Management Plan. The 2015 Mission recommended that in order to protect the Outstanding Universal Value of the property:

1. *Appropriate financial tools for the implementation of the Management Plan must be provided.*
2. *After the adoption and approval of the Management Plan, an Urban Master Plan should be drafted ... <including> ... protection measures related to the World Heritage Property and its buffer zone ...*
3. *Considering the threats and notwithstanding the pressures for a reduction of the protected areas, the boundaries of the World Heritage property should be extended to include the underwater remains of the previous layouts and structures of the ancient town...*
4. *Following the recommendations issued in the 2012 Mission Report, it is recommended to review the condition of the buffer zone on the mainland, in order to protect the area of the necropolis and to maintain a green area visible from the peninsula forming the inscribed property.*
5. *Following detailed indication already contained in the 2012 Mission Report, it is recommended to improve the quality of the seacoast boundary of the inscribed property.*
6. *To intensify the program for the restoration of the churches that need interventions; when works delay for some financial or technical reason, to assure that the site is maintained in condition compliant with the values of a World Heritage Property and somehow visible by the public.*
7. *To assure more effective controls and quicker interventions for the removal of plants component and any other tool or object incongruous with the character and quality of the traditional architecture and to issue addresses for the rehabilitation of buildings compatible with the Outstanding Universal Value of the Property.*
8. *In spite of the assurances about the existence of a Municipal organization devoted to the protection of the Property, it seems that a municipal staff able to constantly monitor the existing buildings and to give technical support to owners and occupants that conduct works of restoration and maintenance is absolutely needed.*

9. *Therefore, it is indispensable that the local staff of the Inspectorate of Monuments will be dimensionally proportionate to the burden of controlling the assigned area, where the Property is located.*

The most recent Decision of the Committee (41 COM 7B.43) *inter alia*;

5. *Expresses its concern regarding proposed infrastructure projects, incompatible with the values, attributes and vulnerabilities of the property, as well as development approach based on mass tourism, which are representing potential threats to the Outstanding Universal Value (OUV) of the property;*
6. *Urges the State Party to halt any unsustainable form of development, such as to open the Nessebar Port Terminal for large ships, and also requests the State Party to recover the terminal area using careful and light intervention compatible with the World Heritage status of the property;*
7. *Invites the State Party to devise a radically different strategy for the sustainable and compatible development of Nessebar that reduces development pressure, by relocating plans and projects for any cruise terminals, or tourist, commercial or fishing ports for large ships elsewhere along the coast outside the visibility area from Nessebar and to develop a sustainable mobility plan to ensure the smooth circulation of residents, visitors and goods;*
8. *Also urges that the State Party introduce all relevant provisions regarding the World Heritage into national legislation, as well as develop and adopt an OUV-based policy, appropriate regulatory instruments and mechanisms to prevent, at the planning and programming stage, inappropriate developments, which could jeopardize the property's OUV and could represent a potential danger, in conformity with Paragraph 179 of the Operational Guidelines;*
9. *Also invites the State Party to strengthen the property's management system, address and resolve weaknesses in management, by reinforcing existing institutional framework and establishing an all relevant high-level inter-ministerial committee, decision-making bodies and working groups that develop and adopt a vision for the future of the property, including strategic programme for its implementation;*
10. *Requests the State Party to adopt all relevant measures and plans (Management plan, Master Plan and Conservation Plan), as well as to enforce the protection regimes and the conservation prescriptions, to support the appropriate implementation of its decisions in order to prevent any threats to its OUV*

Most recently, in November/December 2017, ICOMOS was invited to undertake another Advisory mission to assess the current state of conservation and ascertain progress made by the State Party.

At the same time, Bulgaria, as State Party to the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage, requested a technical mission of its Scientific and Technical Advisory Body (STAB) in order to undertake an archaeological inspection of the remains found underwater within the buffer zone of the property. This mission was approved by the Bureau of the 6th Meeting of States Parties and the experts were selected among the members of the STAB.

The Scientific and Technical Advisory Body (STAB) to the 2001 Convention is a 12-expert-body elected by the Meeting of States Parties and provides advice to States Parties on technical matters related to the implementation of the Underwater Cultural Heritage Convention. It evaluates the observance of the Rules of the Annex of the Convention in all activities directed at the underwater cultural heritage. It also helps in augmenting scientific capacities as well as drafting national actions plans, and guides States Parties in the implementation process of the Convention. It also undertakes advisory missions to evaluate the observance of the Rules of the Annex of the 2001 Convention and issues related to it.

Consequently, the present mission was organized as a joint action by ICOMOS and the STAB. It is the first time that the provisions of both the 1972 and the 2001 Conventions were addressed together and Bulgaria should be congratulated for organizing this innovative and fruitful mission. The mission team were able to highlight synergies between the 1972 and 2001 Conventions and examine the heritage thanks to a common approach.

In particular, the following issues were reviewed during this joint mission:

- The State of Conservation and threats to Outstanding Universal Value (OUV) under the 1972 Convention;
- Existing and potential development projects in or near the property, in particular, plans for the various ports;
- The draft Management Plan and the issues delaying its finalisation and adoption;
- The underwater heritage around the Nessebar peninsula and the assessment of the underwater archaeological works already carried out in the area in the light of the 2001 Convention;
- Training needs with regard to the request by the World Heritage Committee to carry out a Heritage Impact Assessment for the fishing port, with particular reference to the provisions of the 2001 Convention on the Protection of the Underwater Cultural Heritage.

For further details, please see the Terms of Reference as given in Annex 1.

3.0 ASSESSMENT OF THE STATE OF CONSERVATION OF THE WORLD HERITAGE PROPERTY

Given the complexity of the World Heritage property and the number of factors affecting it – both positive and negative – the State of Conservation was assessed against the most significant criteria provided as a framework for Periodic Reporting under the 1972 Convention. Overall, while much progress continues to be made, the property still faces a number of risks. Of particular concern are the conservation conditions of the Byzantine churches, as key attributes of OUV (port developments are also a concern and these are addressed separately in Section 4 below).

3.1 Buildings and development

Much progress was reported on the issue of illegal building extensions for which the Municipality has a project for the removal of additional elements of houses within the historic centre. Existing planning regulations regarding new construction within the World Heritage property and appropriate heights for buildings within and around the property continue to be enforced while new urban and management plans are in preparation.



Examples of the removal of illegal additions to buildings within the historic town. Left: the buildings with illegal additions as they were before; right: the buildings after the removal of the illegal extensions. (© Images provided by the State Party)



Modern elements that have been added onto building facades, such as air conditioning units, are being successfully incorporated in projects to restore facades and disguised to create a more coherent streetscape. (© Sarah Court/ICOMOS)

The Municipality is making progress with regard to the commercial activities found throughout the old town, which had previously been found not to be in keeping with the sense of place. Shops and businesses are being encouraged to substitute highly visible shop signs with ones in natural materials and colours. In addition, commercial activities are being encouraged to limit their presence on the streets and to display merchandise within the shop property, rather than stands outside or on the façade.



Left and centre: the project to ensure that business properties respect certain colours and materials on their facades is having a positive impact on the streetscape where it is implemented. Right: shops are being encouraged from taking up street space with stands and merchandise as this has a certain visual impact due to the number and density of shops in some streets. (© Sarah Court/ICOMOS)

Recommendations:

The current impasse regarding management and urban planning for the World Heritage property, its buffer zone and setting needs to be unblocked in order to ensure that appropriate regulations, including a detailed

Master Plan and a Conservation Plan, are permanently in place. Efforts regarding the removal of illegal additions to buildings, and to improving the urban decorum through the replacement of shop signs and external stands, should continue.

3.2 Transportation infrastructure

With regards to marine transport infrastructure, see section 4.0 of this report below.

When the development project for the fishing port was abandoned (see section 4.1 below), so were plans for increased car parking in that area. The Municipality reports that no new projects related to ground transport infrastructure are planned for the historic town.

Traffic within the peninsula is limited to residents, locally-based businesses and taxis during the peak tourist season to help ease congestion.

Road surfaces are being changed in some key areas within the old town from tarmac to more traditional cobbles and paving. This is to enhance local values and ensure that, wherever possible, the materials used within Nessebar are traditional.

Recommendations:

Any future plans for extending or upgrading transport infrastructure should be evaluated using a Heritage Impact Assessment and ensuring that these changes support the OUV of the property.

3.3 Utilities or service infrastructure

It was reported in a letter from the State Party dated 14 June 2017 that permission had been granted for works within the historic town for 'electrical, sewerage and other installations' and during the Advisory mission recent works could be seen in the streets of the old town for such utilities infrastructure. Representatives of the Municipality offered reassurances that when trenches were dug they were monitored by heritage specialists to ensure that no archaeology was encountered or damaged. It was also reported that other works in the World Heritage property and its buffer zone, such as the necropolis area on the mainland opposite the peninsula, were preceded by appropriate preventive measures and documentation.

Recommendations:

Any current or future plans for utilities infrastructures within the World Heritage property should continue to take into consideration the impact that they might have on OUV and its attributes, particularly the archaeological remains that lie under the old town of Nessebar but also on the mainland opposite, where necropoles and other historic remains have been found.

3.4 Local conditions affecting physical fabric

There are some signs of environmental conditions affecting the physical fabric of historic buildings within the old town, in particular the Byzantine churches and the wooden architectural elements of the vernacular buildings. Ongoing monitoring of the state of conservation of both structures and decorative features needs to be undertaken by conservators, and emergency situations must be addressed immediately.



Decorative features and architectural elements both within and without the Byzantine churches showed the need for conservation interventions to halt decay. (© Sarah Court/ICOMOS)

An important issue to address at the church sites is rainwater management. For example, at the Church of St Paraskeva, the recent installation of a new protective shelter (which in many ways is to be considered a success), does not include rainwater goods to collect and channel rainwater away from the church. There are signs that, as a result, there are problems of rising humidity. Another example is the Church of St Michael and St Gabriel the Archangels, where emergency conservation works were carried out to prop up the structure, but it remains exposed to the elements and with temporary supports; a more complete project is required to offer this monument long-term protection.



Rainwater management needs to be addressed at more than one church, as there are signs that rising damp is a cause of decay. Left: the Church of St Stephen; right: the Church of St Paraskeva. (© Sarah Court/ICOMOS)

Many of the Byzantine churches have wall paintings into which graffiti of ships and related sea-going activities were incised as part of a local tradition believed to protect sailors. While they are still visible, they are particularly vulnerable to decay and need additional protection. These important graffiti underline the significance of Nessebar's connection to the sea and its maritime heritage. They need to be researched,

preserved and documented (see section 5.4 on the inspection carried out by the STAB experts of the graffiti found in two of the Byzantine churches).



Graffiti of boats and ships are found incised into the wall plasters of the Byzantine churches but are at risk of disappearing if the wall paintings are not well conserved. (© Sarah Court/ICOMOS)

There are conservation projects already completed or underway for the churches, such as the project for the Church of St Paraskeva, which was funded by the European Commission, and the ongoing work at the Church of St John Aliturgetos, which is funded by the US Ambassadors Fund for Cultural Preservation. In the 2017 SOC report, it was stated that the Municipality is also in the process of awarding a project for the conservation of the Church of Christ Pantocrator and for the early Byzantine bath complex.



Conservation projects at the Church of St Paraskeva (left) and the Church of St John Aliturgetos (right), among others, have been supported by external funding bodies. (© Sarah Court/ICOMOS)



Left: after initial emergency works funded by the Leventis Foundation, the Church of St Michael and St Gabriel the Archangels awaits funding for a more complete conservation project to address structural issues and those related to its decorative elements. Right: other historic structures within the World Heritage property require attention. (© Sarah Court/ICOMOS)

Recommendations:

The decay of the historic buildings and their decorative features should be mapped by appropriately skilled conservation professionals, identifying in particular any emergency conservation situations that need immediate resolution. Thereafter, ongoing monitoring by conservation specialists of the conditions of the historic buildings needs to take place to ensure that the vernacular and religious buildings are maintained over time. Particular attention should also be paid to the decorative features of the churches so that vulnerable elements, such as the ship graffiti, are conserved as significant attributes that convey OUV. Efforts should be made to secure funding for the more extensive conservation interventions required at, for example, the Church of St Michael and St Gabriel the Archangels.

3.5 Social/cultural uses of heritage

The continuing use of most of the historic buildings within the historic town both supports OUV and ensures ongoing maintenance, although there were concerns expressed that younger residents might perceive a lack of opportunities in Nessebar, leading to the risk of unwanted changes to the local population. These social issues are significant given that the SOUV states that 'today [Nessebar] is a developing and vibrant urban organism' and this too needs to be protected.

As the mission took place in winter, there was little tourism to be seen and it is difficult to comment on the impact of the high levels of visitation reported for the summer months. However, it was evident that the majority of shops and businesses to be found within the historic town cater more for visitors than local residents, with many providing goods for sale that had little to do with the specific values of Nessebar.

Visitation in itself is no bad thing if well-managed as it raises awareness of Nessebar's values, leading to increased support for its protection. In fact, the efforts of the team at the Ancient Nessebar Museum are working in this direction already with the installation of values-based exhibitions in each available church (i.e. with suitable conservation conditions), which complement the archaeological and ethnographic museums. They have also created a self-guided route through the old town to connect these places of visitor interest under the name 'Spiritual Path'. In addition to providing visitors with a greater understanding of Nessebar's significance, there are management advantages to distributing visitors more widely throughout the old town. More could be done in this direction by taking advantage of the walking routes that already exist right around the peninsula's shoreline, as well as along the coast directly opposite. Cultural events are also being organized by the Municipality with other partners out of the peak tourist season and this can contribute to a more evenly distributed visitation pattern over the year. Data from ticket sales to the Ancient Nessebar Museum shows that there are about 100,000 visitors a year, and more detailed visitor research would be helpful to shed light on how many tourists in the area visit the museum or do not, how many visitors are local or regional residents, etc.



Left: the Ancient Nessebar Museum is well-positioned to orientate visitors, encourage their engagement with heritage and distribute them across the World Heritage property. Centre and right: new exhibitions within each well-preserved historic church allow more aspects of Nessebar's heritage to be communicated to the public and provides more places to be visited and appreciated. Visitation to the historic buildings can also help their conservation through continuous informal monitoring of conditions. (© Sarah Court/ICOMOS)

Recommendations:

The local community should be encouraged to remain resident within the peninsula in order to avoid problems found in other historic town centres of gentrification or the phenomenon of losing long-term residents to create temporary visitor accommodation. It might therefore be advisable to explore how heritage might be used to revitalize local craft traditions and support sustainable development, and how services required by residents might be encouraged (e.g. locally-sourced food shops instead of more souvenir shops). Traditional livelihoods, knowledge systems (particularly related to maintenance) and uses of spaces within the old town should also be encouraged.

Future missions might be timed to coincide with the peak tourism season so that the conditions can be assessed directly and precise recommendations provided in support of more sustainable approaches to tourism.

It would be opportune to consider carrying out interpretation planning to build on the successes already achieved by the Ancient Nessebar Museum team. The relatively new discipline of heritage interpretation can ensure a systematic approach to communicating heritage values while also supporting conservation and visitor management issues. Planning could include approaches that 'de-market' Nessebar for mass tourism, instead promoting events programming and alternative forms of tourism that support visitation by regional and local residents and other target audiences, which can bring a steadier flow of visitors throughout the year and reduce some of the negative impacts of tourism.

3.6 Ecological or geological events

Erosion of the Nessebar peninsula has taken place throughout history and in past decades reinforcement works have taken place around the peninsula. There is now evidence that some of the tetrapods used are beginning to erode. This issue needs to be monitored over time, particularly with regard to the impact of erosion on historic port structures or underwater heritage.

Recommendations:

Erosion of the Nessebar peninsula needs monitoring to ensure that the form of the peninsula is preserved or appropriate changes are allowed. Where reinforcement works take place these must take into consideration heritage along the coastline and underwater.

3.7 Management and institutional factors

At the time of the Advisory mission, there was still no Management Plan in place for the World Heritage property. Concerns about this situation have been raised on numerous previous occasions. Although the draft Management Plan was reviewed favourably by ICOMOS, it has not proved possible to finalise, adopt and implement it. It should be noted that the national *Ordinance on the Scope, Structure, Contents and Methodology for Developing Conservation and Management Plans of Single or Group Immovable Cultural Properties* (8 March 2011) foresees that plans cover a period of up to 20 years, which are then subdivided into 5-year implementation plans.

The situation has not changed since the State Party last responded to ICOMOS on this subject (see the 2017 State of Conservation report) but the Deputy Minister for Culture summarised again the current issues that are delaying the adoption of the management plan:

1. *funding*: as previously reported, the Ministry of Finance did not accept the proposal in the draft Management Plan for a dedicated cultural fund, which used both public and private funding, as this would be in conflict with the Public Finance Act which does not allow funding streams to be mixed. As yet, no alternative source of funding has been identified, although there are hopes to bring together municipal and state funding for different aspects of the plan;
2. *legal framework*: the draft Management Plan referred to specific legislation regarding Nessebar's heritage that will no longer be passed. Instead the Management Plan will need to refer to the framework provided by the nationwide Cultural Heritage Act and planned revisions to it;
3. *boundaries*: the boundaries defining Nessebar do not always coincide, making management more complex. This situation is being reviewed.

It was reported that work was underway to resolve these issues as soon as possible and that by the end of 2018 a new Management Plan would be submitted to the World Heritage Committee. However, the State Party wished to reassure the Committee that while a Management Plan was not yet adopted, the processes that a plan would outline were already underway for the conservation and management of the World Heritage property.

With regard to the issue of boundaries, there seems to be some uncertainty about the role played by the buffer zone and the wider setting in supporting OUV of a World Heritage property. To give just one example, a letter from the Ministry of Transport dated 8 June 2015 states that the Port Terminal of Nessebar is not part of an archaeological reserve or World Heritage and therefore the Ministry does not find itself in agreement with the ICOMOS Bulgarian National Committee on certain management concerns. The question here is not one of whether or not the port is found within the boundaries of a protected area; discussion should instead focus on which activities are (or are not) appropriate in the buffer zone and wider setting, so that the OUV of the property is conserved.

Recommendations:

The State Party is urged to address outstanding issues as soon as possible so that the Management Plan can be formally adopted. A staged approach is recommended, comprising:

- Amendment of the current draft Management Plan to reflect the current statutory regime, available resources and relevant Mission recommendations (2010 to 2017), and incorporating a first 5-year implementation plan;
- Adoption and implementation of this preliminary 5-year Management Plan as a matter of great urgency;
- Preparation of a second-phase 20-year Management Plan, which addresses required longer-term institutional, statutory and resourcing issues, including appropriate mechanisms for providing resources for conservation and incentives and support for Nessebar residents, and the possibility of statutory changes directed at preservation and development of the Ancient City of Nessebar in a manner which conserves the OUV of the property.

3.7 Conclusions: State of Conservation

The World Heritage property: The Ancient City of Nessebar retains the key attributes that underpin its Outstanding Universal Value (OUV). There has been significant recent progress to protect the OUV of the property and to reverse negative impacts that took place in the past. However, the OUV does remain at risk from inappropriate development, inadequate resourcing for physical protection and conservation works, inadequate institutional support, the absence of an adopted Management Plan and subsidiary masterplanning and conservation / development documents and guidelines. There are also changes taking

place at the property which have not been thoroughly assessed in advance in order to understand and respond to potential heritage impacts. The major current threat to the integrity and authenticity of the property arises from current and potential future projects and the absence, to date, of a rigorous process of Heritage Impact Assessment.

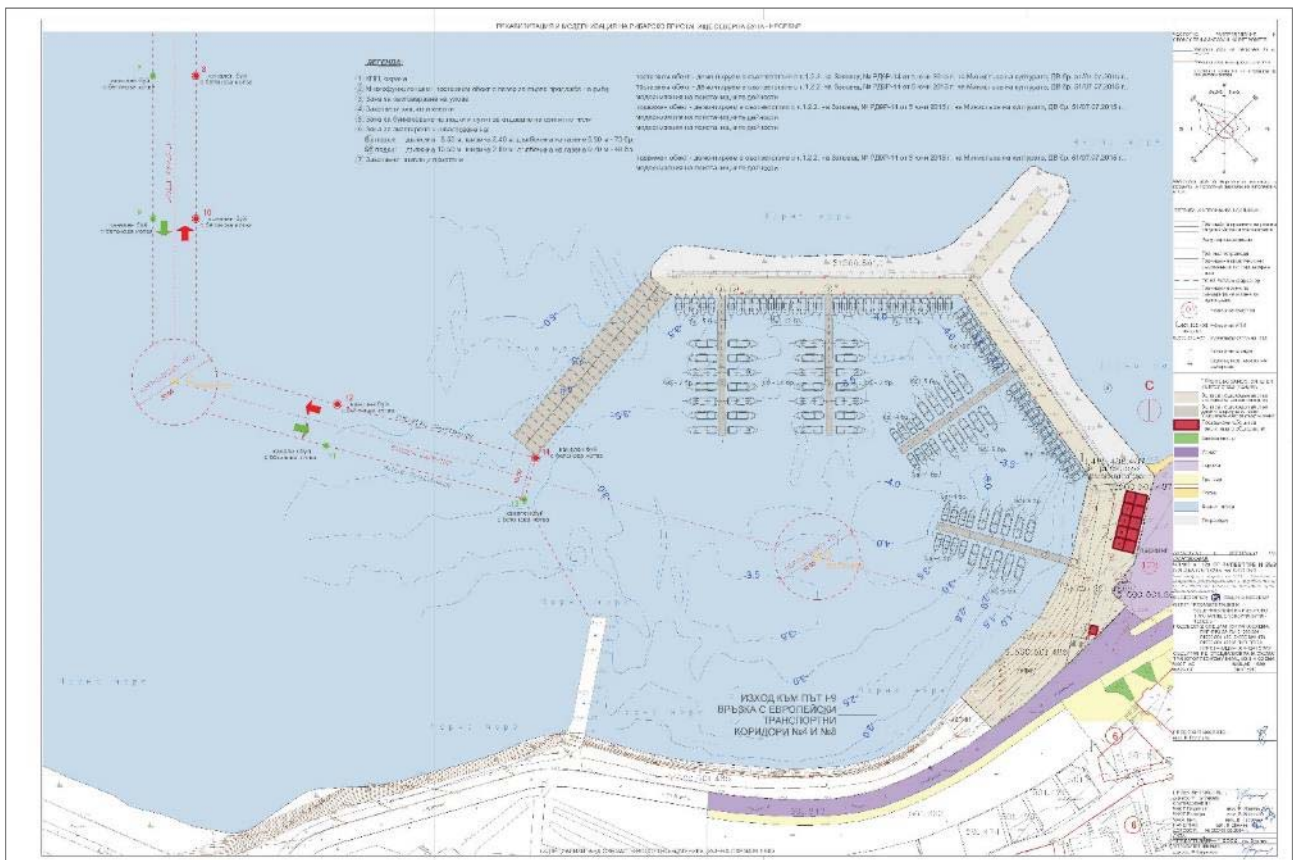
4.0 PORT DEVELOPMENT PROJECTS

The World Heritage Committee has twice requested that the State Party use Heritage Impact Assessment (HIA) as a tool for evaluating the impact of development projects in and around the World Heritage property. In 2013, it was requested that the State Party ‘Strengthen the protection status of the sea coastline and include mandatory heritage impact assessments for proposed developments’, whereas in 2017 there was a specific request ‘to carry out a HIA for the modernization of the existing fishing port’ (refer to Annex 6 for specific Committee Decisions).

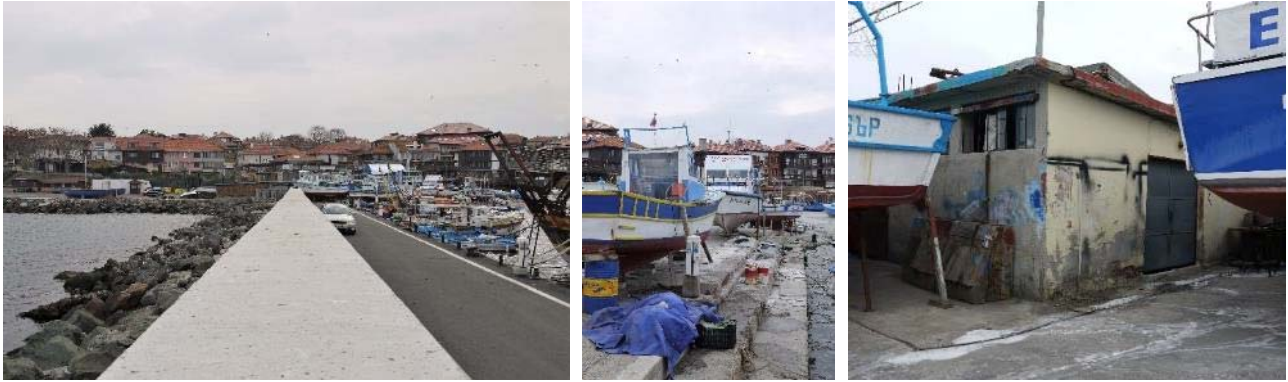
4.1 Severna Buna (‘Northern Dike’) Fishing Port

The World Heritage Committee expressed concern about a project for the enlargement of the Severna Buna Fishing Port, situated on the west side of the Nessebar peninsula, just north of the isthmus that connects it to the mainland. However, owing to concerns about the negative impacts that this would have on the World Heritage property, the State Party announced in a letter dated 3 May 2017 that the enlargement project had been abandoned.

During the Advisory mission, new plans for the fishing port were presented, which involve upgrading the existing facilities to meet European Union regulations without enlarging the port or adding permanent structures. This project will cater for the existing fishing community, which was reported as being made up of 180 registered boats using 120 existing berths. New landing stages will be added but these will be floating docks that will be located within the current port area.



Drawing sheet from the new design proposal for upgrading the fishing port, showing the floating structures that will be added while avoiding the addition of any new permanent elements. (© Image provided by the State Party)



The revised project for the fishing port foresees the upgrading of existing facilities. (© Sarah Court/ICOMOS)

In addition, it was stated that no new infrastructure will be added to the port-side area. For example, instead of adding additional car parking areas, existing facilities will be used and the current access road will remain as it is. Port-side facilities will be limited to one storey (less than 6m in height) and building density will remain less than 10% in that area.

The changes to proposals for the Severna Buna Fishing Port are welcome, as is the intention to make better use of existing facilities, rather than construction new infrastructure. It will be important that new facilities, including the floating docks are of an appropriate design and are assessed through preparation of a Heritage Impact Assessment before construction commences.



Detail showing how new port-side facilities will be limited in height so as not to impact visually on the buildings of the historic town above. (© Image provided by the State Party)

With regard to underwater heritage in the fishing port area, in 2015 the Bulgarian Centre of Underwater Archaeology carried out an underwater archaeological survey in the area potentially affected by the port expansion project. The results of the electrical resistance profiles suggested the presence of buried structures, without further conclusive results (see sections 5.2 and 5.3 for more details of the evaluation of previous work and the archaeological inspection in this area that was carried out by the STAB experts).

However, given that no new permanent structures will be created and no dredging of the port area is foreseen, this is not a reason for concern at this time. The new project was approved by the Regional Council for Development on the basis that it was in compliance with planning law.

A Committee of Experts convened by the Ministry of Culture has recommended that any future construction in this area should be accompanied by archaeological supervision. In view of the significance of underwater features, works which may affect them should be preceded by underwater survey and assessment, as well as being accompanied by archaeological supervision.



Left: the alignment of the north-eastern sector of the underwater structures found near of Severna Buna Fishing Port in the 1960s seen from the peninsula before the construction of the road and the jetty. Right: the alignment in its current state, looking towards the peninsula. (© Yves Billaud/DRASSM)

4.2 Nessebar Port Terminal

The passenger terminal that extends out from the southwest of the peninsula is property of the State which has given it in concession to a private company since 2014. The Ministry of Transport reported on 17 November 2017 that the concessionaire has carried out the following actions to date:

1. installation of a boundary fence;
2. maintenance of the car park, pedestrian routes, green areas and lighting;
3. studies regarding geology, soil structure, etc. for updating the Master Plan and other assessments necessary for obtaining work permits;
4. installation of security systems;
5. implementation of a port operation management system;
6. preparation of safety procedures.

None of these actions seems to have involved the addition of any permanent structures or changes to the port area and do not raise concern at the present time. However, the lack of pro-active conservation and the sense that the area has been 'abandoned' does detract from the property.

The concession-holder has the right to propose developments to the port area or changes in use patterns, although it has not yet done so. An investment programme is submitted annually to the Ministry of Transport, which then examines the concessionaire's proposals, with the support of a commission responsible for monitoring the concession contract. A representative of the National Institute for Immovable Cultural Heritage has been included on this commission. The National Institute would send a written opinion on any development proposal to the Ministry of Culture, which in turn would notify the World Heritage Committee.

In summary, although the passenger terminal precinct has not been subject to any actions to date which adversely affect the OUV of the property, the precinct is vulnerable to neglect and to the potential for inappropriate developments, which could arise from the interests of the private concessionaire. It is therefore important that any new proposals be preceded by a thorough Heritage Impact Assessment.

4.3 Marina Nessebar

Between the Port Terminal and the isthmus on the south side of the peninsula, there is a privately-owned area known as 'Marina Nessebar 1' and 'Marina Nessebar 2' which are respectively described as 'Yacht port with commercial and administrative complex' and 'Trade-serving complex'. The intended use of this complex, as filed with the Register of Ports, is for 'Mooring, homeport and stay of yachts used for the purposes of water sports and entertainment programs'. An inspection carried out in September 2017 by the Regional

Inspector of the Cultural Heritage Conservation Inspectorate of the Ministry of Culture found that the port facilities were made up of floating pontoons, which are duly registered as such, and anchored with dead anchors and chains.

The issue of greatest concern in this area was the series of concrete structures built out into the sea, which are as yet unfinished and already clearly visible from satellite images (see the cover of this report). These seem to be mooring structures for yachts and recreational boats as the mission team had the chance to see on-site. They have been identified by the State Party as floating caissons, which are prefabricated concrete box-like elements. It should be noted that the term 'floating' with regard to caissons refers to the way in which they are fabricated on floating docks and then floated into position. Once they have reached the desired location the cavities within them are filled and they are thereby lowered into position on the seabed. In this case the cavities are reported as being filled with water so as to allow the possibility of emptying them and moving them. Their presence may not only affect the seabed where they are standing but they may also have an impact on the marine conditions affecting the nearby ancient port of Nessebar (e.g. allowing for a faster silting process, exposing as yet unidentified underwater cultural heritage, etc.), as well as an adverse impact on the visual quality of the precinct.

The September 2017 inspection by the Cultural Heritage Conservation Inspectorate also noted that:

At the starting point of the isthmus, to the south of the new part of the town of Nessebar, we found that a port facility was built, as well as south of the entrance of the old part of Nessebar a dyke was constructed on which a statue is placed on a pedestal, as up to the time of conducting this inspection, the ownership thereof has not been established definitively, nor the documentation related to the construction thereof.

As plans for this area are unknown and the final extent of the project is not understood, it is urgent to establish what impact this will have on the World Heritage property and the underwater cultural heritage, if there are any underwater archaeological remains and if these are affected by the new concrete structures. The lack of information and potential for inappropriate development in this area poses a potential threat to the OUV of the World Heritage property.



Work is currently underway at the Marina on concrete structures that extend out into the sea, although the details of this project are not known at this time. (© Sarah Court/ICOMOS)

The area on land adjacent to the Marina, just behind the restaurant district, is also currently subject to building works, as noted in the previous mission. In this case the Municipality reported that this area is

outside the World Heritage property boundaries and so building is permitted, although all new construction is limited, e.g. no structures are allowed above two storeys in height. In fact, the original plans for this area were revised to conform to requests from the Ministry of Culture to reduce heights, etc. However, it should be noted that this is a significant building project within the buffer zone that might impact on OUV. Such large-scale developments have potential to threaten the OUV of the World Heritage property and therefore need to be assessed, in advance of permission being granted, on the basis of full analysis of the heritage and other values of Nessebar through a comprehensive Heritage Impact Assessment. It might be that such projects support Nessebar's values and sustainable development but this needs to be established clearly in advance, together with clear understanding of any potential negative impacts so that if necessary the project can be discontinued, amended, or mitigation measures can be taken.



The area to the south-west of the Nessebar peninsula, between the Marina and the World Heritage property, is subject to ongoing construction work. (© Sarah Court/ICOMOS)



Planning permission was granted for construction next to the Marina on the basis that the project conforms to requirements for the buffer zone, e.g. height restrictions, but no formal assessment of the impact of this project on OUV seems to have taken place. (© Sarah Court/ICOMOS)

4.4 Conclusions

The revised project for upgrading the Severna Buna Fishing Port no longer seems to pose any risk for OUV and at present there are no proposals for the Nessebar Port Terminal that are a cause for concern. However, the Marina Nessebar should be investigated immediately as the nature and extent of the project seems to be unknown to the heritage authorities and no assessment has been made on its impact on OUV or underwater heritage. No further works should proceed unless and until a comprehensive Heritage Impact Assessment has been prepared.

With regard to these various developments around the coast, the Statement of OUV refers to the fact that Nessebar ‘forms a harmonious homogenous entity with the outstanding natural configuration of the rocky peninsular, linked with the continent by a long narrow stretch of land’. This harmony has been gradually eroded over the years by a series of developments along the coast of the peninsula, and the integrity and authenticity of the property – and therefore its OUV – is directly threatened by the prospect of further projects that change the natural morphology.

The Ancient City of Nessebar is at risk from port developments. Although some of the projects completed to date have involved adverse heritage impact, the major threat to the integrity and authenticity of the property arises from potential future projects and the absence, to date, of a rigorous process of Heritage Impact assessment which can inform project decision-making, design, implementation, and mitigation measures.

Recommendations:

Given the number of current and potential projects at Nessebar, it is essential to implement thorough and comprehensive Heritage Impact Assessment (HIA) framework which includes a comprehensive values analysis, consideration of potential effects on heritage values, authenticity and integrity, and accords with the 2011 *ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*. All information regarding underwater cultural heritage and natural heritage needs to be taken into consideration during any such values assessment and, if necessary, identification and assessment of potential sites should be undertaken by developing appropriate evaluation projects following the Rules of the Annex of the 2001 Convention. This framework would then consider developments within the World Heritage property and also establish a sophisticated understanding of how change in the buffer zone and wider setting may also have positive and negative impacts on OUV and other values. This could then be used as a baseline for efficiently evaluating all significant change and development projects around Nessebar.

With regards to the HIA that was requested for the fishing port, this should be a relatively straightforward exercise now that the facilities will be upgraded without major new construction. An HIA should be carried out for any future development proposals for the Port Terminal but is particularly urgent now to enable an understanding of the extent of impact of the works currently underway at the Marina.

In addition, developments along the immediate stretch of coastline in front of Nessebar should also be considered. For example, aerial photographs show the cumulative changes as not only have port structures been built at the Port Terminal and Marina but also facilities on the mainland directly opposite them (see cover photograph). Taken together, they are gradually changing the form of the peninsula and its relationship with the sea as they stretch out towards each other. It is therefore important to explore how much such change is a continuation of geomorphological and historic processes and how much it creates cumulative adverse impact – such that limits to development might need to be established. Such changes need to be assessed in advance for their impact on OUV and other values so as to avoid the risk that slow encroachment has an inappropriate cumulative negative effect over time.



Development continues along the coastline opposite the peninsula, both in terms of accommodation (left) and port facilities (right), which has an impact on the visual relationship between Ancient Nessebar and its setting, and also contributes to changing the form of the isthmus and the connection of the World Heritage property to the mainland. (© Sarah Court/ICOMOS)

5.0 UNDERWATER CULTURAL HERITAGE

Bulgaria ratified the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage in 2003, committing itself to identify, evaluate and protect all underwater cultural heritage found in its waters, fostering underwater archaeology and other related disciplines, as well as sensitizing the public to the importance of submerged archaeological sites. Therefore, Bulgaria has an obligation under the 2001 Convention to protect its underwater cultural heritage and to cooperate with other States in this regard.

The Ancient City of Nessebar was listed as a UNESCO World Heritage property in 1983 with an area of 27 ha and a 2 km (or 1245 ha) buffer zone in the Black Sea. From the beginning, the listing included a maritime belt around the peninsula to protect the archaeological remains submerged by only a few meters of water, which are observable there. These remains are mentioned on page 3 of the Nomination file as:

The archaeological finds cover an area almost twice as large as the peninsula itself since a great part of them are placed underwater, on the sea bottom, where the antique Messambria has been situated. They truly reflect the historical vicissitudes and the culture of Nessebar in the 2nd Millennium BC as well as the role the sea played in Bulgaria's development.

Despite this, significant threats caused by the ongoing development of seaside resorts and port development projects have the potential to endanger the preservation of such underwater archaeological remains, as has already been noted by the World Heritage Committee on several occasions (as seen in the Decisions of the Sessions of the World Heritage Committee in 2010, 2011, 2013 and 2017). The impact of tourism, port and marine infrastructure developments and, as a corollary, the need for a legal framework and a Management Plan that adequately addresses these issues has been mentioned several times.

5.1. The UNESCO Scientific and Technical Advisory Body Mission

The underwater cultural heritage component of the Advisory mission initially focused on the project of expansion of the fishing port, northwest of the city, but was expanded to evaluate all archaeological structures found underwater in the Ancient City of Nessebar.

The main task of the STAB mission, according to the Terms of Reference (see Annex 1), was:

Evaluating the results of underwater archaeological research in the past, with a focus on the most recent research programs, including those carried out in 2015-2017, and make recommendations for any additional research needed to assess the archaeological potential of the submerged Nessebar site and the measures to be taken to minimize impacts on the submerged remains.

The five days of on-site mission were devoted to dives for evaluating the submerged structures (sites off the south-east and north-west of the peninsula), working sessions and conference sessions with heritage and municipal authorities and archaeological researchers, as well as visits to museum institutions (Ancient Nessebar Museum and Varna Archaeological Museum), where important underwater archaeological collections are preserved, and local research centres (Centre for Underwater Archaeology, Sozopol).



Plan of all the archaeological structures identified since 1960 (© Prahiv *et al.* 2017)



The radical transformation of the periphery of the peninsula since the 1980s can be seen in these two images: a 1980s postcard (left) and current aerial photograph (right) both showing views of Nessebar from the east looking towards the mainland. (©Prahiv *et al.* 2017)

5.2. Evaluation of underwater research carried out in Nessebar

The submerged structures of the Ancient City of Nessebar were the subject of remarkable pioneering work between 1960 and 1984, which led to the integration of a wide coastal belt around the peninsular as the buffer zone when the property was inscribed in 1983. A history of the research which led to the development of an overall plan for the recognizable submerged structures around the island is provided by a 2017 report of the Centre for Underwater Archaeology. Although there are not many available documents, it seems that the first underwater archaeological research in this area followed international standards and achieved high-quality results.

The survey carried out is very detailed and shows that the fortifications or wall structures identified to the east, mostly offshore, about 200 m from the coast and about 5 m deep, can be attributed to the ancient

Thracian city; those at a depth of 4 m and at a distance of 80-130 m from the coast are from the Hellenistic period; and those at a depth of 2 m and at a distance of 60-80 m from the coast date to late antiquity. Since these surveys were undertaken, peripheral structural works (e.g. hard coastal protection measures, coast road, etc.) have covered all the fortifications on the north shore.

In 2015, the Municipality's project to expand the fishing port in the north-western part of the peninsula (see section 4.1) led the Centre for Underwater Archaeology to carry out a geophysical survey campaign (multibeam sonar survey around the peninsula and electrical resistivity in the areas subject to development proposals) and diving surveys. Three trenches were dug to explore electrical anomalies that showed up during the survey but they did not reveal any structural remains.

In 2017, 33 years after the end of 1980s research project, a new program dedicated to the submerged structures of Nessebar was launched by the Centre for Underwater Archaeology with the aim of drawing up a status report (on the conservation conditions, erosion, evolution of the situation since it was first documented, etc.), to document the structures through survey, to propose interpretations in terms of dating, and to consider the evaluation options. The 2017 campaign focused on the south-eastern sector, continuing the bathymetric surveys and undertaking photogrammetric recording of the recognized structures.

The research program is both logical and thorough, providing increased understanding of the general situation (through geophysical survey) and detailed features (thanks to the resumption of structural surveys involving both conventional drawing methods, as well as photogrammetry). The approach adopted is professional from both a technical and a scientific point of view, and follows the Rules of the Annex of the 2001 Convention. During the underwater surveys, the archaeological structures discovered during the earlier campaign were identified and new elements were highlighted. However, accurate positioning of the surveys has not been achieved so far.

5.3 Evaluation of the in situ underwater archaeological remains by the STAB experts

Underwater archaeological inspections were carried out as part of the Advisory mission in order to measure the built-up complexes of the south-east and north-west sector (the fishing port).

5.3.1 South-east sector

These structures (numbered 9 to 12 on the plan above), which were the subject of the Centre for Underwater Archaeology's campaign in 2017, extend more than 600 meters on both sides of the modern seawall. They consist of various elements constructed using different building techniques (i.e. rubble and mortar, aligned large cut blocks, a pile of cut or roughly-squared blocks) belonging to different types of structure (including a probable bastioned rampart) and dating from various periods. Some isolated architectural elements (e.g. columns, perforated blocks) are also visible. The remains survive only to a low height, nevertheless, these are sufficient to see the position and orientation, despite underwater flora and fauna. Due to the repeated action of the water currents at this shallow depth, large areas of the bedrock are exposed and the virtual absence of sediments and any finds associated with the structures leaves little hope for data to be gained from stratigraphic excavation.



Photogrammetric image of a stretch of the fortification wall and a tower submerged 3 meters down in the south-east sector of the peninsula (area of point 9 on the plan above) (© Prahiv *et al.* 2017)



Photogrammetric image of the structure composed of masonry blocks visible in point 9 (© Prahiv *et al.* 2017)



Detail of a fragment of masonry bearing the imprints of structural elements in wood (left: © Prahiv *et al.*, 2017; right: in situ during the 2017 UNESCO mission, © Yves Billaud/DRASSM).



Images of the wall remains identified by the STAB mission. (© Arturo Rey/UNESCO)

5.3.2 North-west sector (Severna Buna Fishing Port)

The structure corresponding to point 1 on the general plan above was only slightly affected by the construction of the ring road and the current port's seawall. Covered with abundant underwater vegetation, the alignment is made up of three types of elements: metre-sized blocks of tenacious rock, with rounded shapes and smooth surfaces, including those exceeding the surface of the water; sections of masonry in terracotta tiles, similar to those visible in the rampart of the city in built in *opus mixtum*, which may be arranged flat or obliquely; and finally rare limestone blocks, some of which show perforations that seem to result from an attack of lithophages. There are numerous fragments of ceramics on the sandy seabed which are eroded and difficult to identify.

In the absence of stratigraphic data, the interpretation of this alignment is delicate. It could be interpreted as two distinct and diachronic structures: the collapsed remains of a rampart in *opus mixtum*, bricks and limestone, and a raised structure (forming a jetty or seawall?) made with totally different materials.

However, as stated before in section 4.1 of this report, if no new permanent structures and dredging activities are going to affect the underwater area within the new port plans, the underwater archaeological remains should not be negatively affected. Nevertheless, it is highly recommended that thorough archaeological research of the area is undertaken and any future works supervised by the competent archaeological services.



Masonry in terracotta tiles (© Yves Billaud/DRASSM)



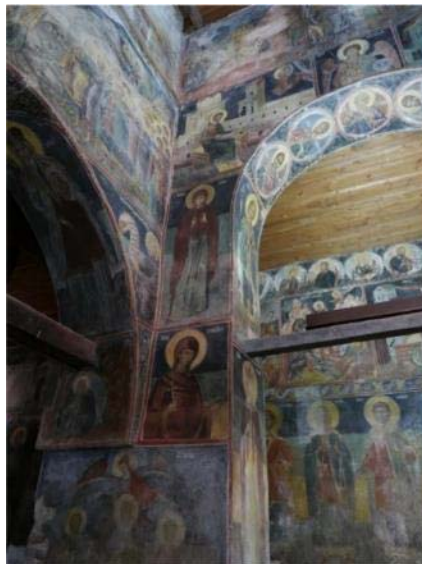
Detail of the masonry terracotta tiles (© Arturo Rey/UNESCO)

5.4. Maritime graffiti

In addition to the underwater archaeological inspections, the STAB experts examined the maritime graffiti in two of the Byzantine churches, the Church of St Stephen (built in the 11th century, later rebuilt in the 16th century) and the Church of St Spas (built in the 17th century), already mentioned earlier in this report. As has been stated, the richness of this corpus, several hundred graffiti depictions, is a considerable iconographic source for the modern period and remains almost untapped. The only university work was carried out in the 1980s and remains unpublished. The Church of St Spas has experienced conservation issues related to roofing problems and the painted plaster in the immediate vicinity of graffiti has already begun to deteriorate. The Centre for Underwater Archaeology hopes to implement a digitization program for all graffiti and seeks the advice of international experts, notably from the STAB and from DRASSM (the French Underwater Archaeology Research Department) to support this necessary project both professionally and financially.



The Church of St Spas (© Yves Billaud and Souen Fontaine/DRASSM)



The Church of St Stephen (© Yves Billaud and Souen Fontaine/DRASSM)

5.5. Recommendations regarding the underwater cultural heritage

The comparative analysis between the inspection of the underwater archaeological sites together with the examination of past and current research undertaken highlights the huge archaeological potential of the submerged sites. This underscores the need to preserve these sites and continue their study and, as a corollary, emphasises the quality and relevance of the new research project initiated in 2015 by the Centre for Underwater Archaeology.

Within the framework of the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage and the application of the Rules of its Annex for all activities directed to the underwater cultural heritage, the Scientific and Technical Advisory Body recommends to the State Party and its competent authorities to:

1. establish a **national action plan concerning the implementation of the 2001 Convention** and a coordination scheme between local, regional and national competent administrations as well as with

other relevant private and civil society entities for better research and protection of the underwater cultural heritage;

2. reinforce and expand the **research programme for the underwater cultural heritage of the Ancient City of Nessebar**, as an integral part of developing the national inventory of underwater cultural heritage, as foreseen by Article 22 of the 2001 Convention, under the observance of the Rules of its Annex. This should follow four main lines of action: i) a documentation review (according to the preservation of and the possibility of accessing the primary data and interpreted plans of the 1960-84 research); ii) the development and maintenance of a Geographical Information System (GIS); iii) the continuation of underwater archaeological surveys around the Nessebar peninsula; and iv) the development of specific studies for the conservation and enhancement of the underwater archaeological remains of the Ancient City of Nessebar;
3. launch a feasibility study on the underwater archaeological sites to explore how to make them **accessible to the public through 'maritime archaeological routes'** and other interpretation initiatives that could include, for instance, the maritime graffiti found in the Nessebar churches, providing new perspectives on the relationship between the Ancient City of Nessebar and its maritime landscape;
4. launch a **digitalization programme for all maritime graffiti** found in the Nessebar churches, including a **conservation assessment** to identify emergency measures to be taken to avoid any loss of the graffiti and the wall paintings they are on, while longer-term conservation plans take place as part of Bulgaria's World Heritage commitments;
5. establish a **capacity-building programme** in cooperation with UNESCO and its partners to improve the identification, evaluation, research and protection of the underwater cultural heritage in Bulgaria;

Concerning the assessment of the evaluation carried out and the OUV of the Ancient City of Nessebar as inscribed in the World Heritage List, the State Party and its competent authorities should:

6. consider proposing a **minor boundary modification** to include the underwater cultural heritage found in the buffer zone within the World Heritage property given that it is an attribute of the OUV and given that the issue of boundaries is being reviewed as part of the revision of the draft Management Plan.

6.0 TRAINING IN HERITAGE IMPACT ASSESSMENT AND UNDERWATER CULTURAL HERITAGE

Two days were dedicated to training for public officials with regard to i) Heritage Impact Assessment and ii) Underwater Cultural Heritage. See Annex 4 for the detailed programme and Annex 5 for a list of those who attended. It was very satisfying to work with a group of high-level motivated heritage professionals who took the time to attend despite their many other commitments.

6.1 Training on Heritage Impact Assessment

The day dedicated to Heritage Impact Assessment (HIA) was largely based on explaining the methodology outlined in the 2011 *ICOMOS Guidance for Heritage Impact Assessments for Cultural World Heritage Properties* document, illustrated with examples of HIAs carried out at other World Heritage properties. To highlight the complex range of issues to consider, the case of the Old Town of Galle and its Fortifications was described in some detail; it was useful as an example in terms of the many parallels, both in terms of the heritage and the nature of the development project for its modern port. A second case study was also summarized so that examples of both negative and positive impacts were provided. This allowed training participants to understand the full potential of HIA as a method for evaluating change. In addition to presenting the *ICOMOS Guidance* document, other tools and resources were indicated that may be of practical help to those carrying out HIAs in the future and tackling other issues related to management of the World Heritage property. Finally, a thorough presentation of the 2001 Convention was provided, as well as of guidelines on how to develop Management Plans for underwater cultural heritage, so that due attention is given to Nessebar's underwater cultural heritage in any HIA.



Presentations were given on both HIA and underwater cultural heritage in order to develop the capacities of the professionals involved in the conservation of Nessebar. (© Sarah Court/ICOMOS)

It is worth noting that the presentations given during training were interspersed with short working sessions that encouraged the participants to contribute to the discussion of a series of issues related to the HIA process. A first mapping exercise to identify heritage attributes allowed participants to articulate the fact that the situation is perhaps more complex than they initially thought; for example, there are elements of the water supply system that extend under the entire peninsula and out into the buffer zone. The results of an exercise to list stakeholders to be consulted in the context of HIA or other World Heritage processes suggested that it might be fruitful to undertake a more formal stakeholder identification process and then develop a stakeholder management approach that involves the relevant groups for specific projects. Finally, an exercise to stimulate discussion on changes at the World Heritage property that might require management revealed that it is perhaps not yet institutional culture to recognize the range of developments that might have potential impact (positive and negative) on OUV and when this might need assessing.

As follow up to the training, all the presentations, the *ICOMOS Guidance* document, the HIA examples and further material on underwater cultural heritage were made available to participants for their future use.



Working sessions included mapping of Nessebar's attributes that convey OUV and other values, as a preliminary step towards the values analysis that will be needed for the HIA requested by the World Heritage Committee. The range of attributes reflected the range of stakeholders represented at the training day. (© Sarah Court/ICOMOS)



Discussion of attributes showed that they are to be found across the Nessebar peninsula – and below it – and also extend into the buffer zone, causing discussion on how best to manage the property. (© Sarah Court/ICOMOS)

6.2 Training on Underwater Cultural Heritage

The training day on Underwater Cultural Heritage focused mainly on the management of underwater and coastal archaeological sites and on the national implementation of the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage.

In addition to the presentation of the 2001 Convention and its Annex that had taken place during the HIA training the previous day, the STAB experts presented case studies from Albania and France in reference to the management models and implementation schemes designed under the framework of the 2001 Convention that had the potential to fit the reality of the Ancient City of Nessebar as a best practice model.



The experts from the UNESCO Scientific and Technical Advisory Body (STAB) conducted the training session on Underwater Cultural Heritage Management and the Implementation of the UNESCO 2001 Convention. (© Arturo Rey/UNESCO)

The national underwater archaeologists from the Bulgarian Centre for Underwater Archaeology presented the results of research that has been carried out in Nessebar since 2015, as well as other relevant work carried out in Bulgaria related to the discipline.

An interesting debate took place concerning the need for major research and protection of the underwater archaeological sites of Nessebar, as well as their potential for being preserved and made publicly accessible.

Recommendations:

It would be helpful to have formal feedback from participants to evaluate the success of these training sessions and establish any other professional requirements that could be addressed in future. However, informal feedback suggests that the participants found the two days addressed their needs and some individuals requested similar training on other issues related to the requirements of managing a World Heritage property, in particular, change management and sustainable development. The State Party should be congratulated on having included such national capacity building within the Advisory mission and is encouraged to invite the Advisory Bodies to support further capacity building for Bulgaria in the future.

The discussion that took place among the participants, particularly during the working sessions, was particularly helpful in advancing the understanding of the issues facing Nessebar. This experience could be

considered as a preliminary phase of the consultation process that forms part of the HIA methodology and more such exercises could be carried out to take this participatory approach forward so as to best protect OUV. The State Party and its competent authorities should organize more opportunities for representatives of all the relevant authorities to continue to work together to take the HIA forward.

7.0 CONCLUSIONS AND RECOMMENDATIONS

Much energy continues to be dedicated to the management of the Ancient City of Nessebar, and positive efforts for the conservation and enhancement of OUV and other values are to be acknowledged. However, there are still some major outstanding issues that need addressing, particularly related to development projects within the World Heritage property and its buffer zone. A comprehensive values analysis would be useful as a baseline against which to evaluate proposed changes, using a methodology such as that proposed in the 2011 ICOMOS *Guidance for Heritage Impact Assessments for Cultural World Heritage Properties*, to foresee potential positive and negative impacts and then to take transparent values-based decisions. This would enable values-based decisions about whether projects should proceed at all, or be amended, and could identify what mitigation should take place to avoid/reduce negative impacts, while positive impacts could be reinforced when they support OUV and contribute to sustainable development.

Other areas of concern, such as the conservation of the physical fabric of the historic town and the sense of place of this 'developing and vibrant urban organism', could be more systematically addressed if the Management Plan was finalised, adopted and implemented. The fact that the plan is not yet adopted, despite years of recommendations and proposals, presents a threat to the OUV of the property. In order to break the current impasse, it would be appropriate to stage the finalisation and adoption of the Management Plan, with an initial focus on the current statutory and resourcing circumstances reflected in a 5-year plan to be submitted to the World Heritage Committee, with longer-term commitments and issues addressed in a second stage.

Nessebar's underwater cultural heritage needs to be considered in all areas of management and planning, as an important attribute of OUV. In addition, the State Party should consider a minor boundary modification to the World Heritage property in order to increase the protection of Nessebar's underwater cultural heritage. Bulgaria, as a State Party to the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage, has made a commitment to identifying, evaluating and protecting all the underwater cultural heritage found within its interior and territorial waters. The State Party is strongly recommended to reinforce its competent national authorities, ensuring that the obligation is respected to follow the Rules of the Annex of the 2001 Convention in all activities related directly or indirectly to the underwater cultural heritage, and to carry out Heritage Impact Assessments for the underwater archaeological remains, or on the area where they may be found, whenever developments are proposed.

The following points summarise the conclusions and recommendations that are suggested throughout this report, that have been extracted and grouped together under the points that the Advisory mission team were requested to examine as laid out in the Terms of Reference (see Annex 1).

1. Assess the state of conservation of the property, having particular regard to the evolving trends and current pressures.

The World Heritage property The Ancient City of Nessebar retains the key attributes that underpin its Outstanding Universal Value (OUV). There has been significant recent progress to protect the OUV of the property and to reverse negative impacts that took place in the past. However, the OUV does remain at risk from inappropriate development, inadequate resourcing for physical protection and conservation works, inadequate institutional support, and the absence of an adopted Management Plan and subsidiary masterplanning and conservation/development documents and guidelines.

2. Identify the vulnerabilities, existing and potential threats to the Outstanding Universal Value of the property.

The OUV of the property remains threatened by inappropriate development, inadequate resourcing and institutional support, and particularly the absence of a Management Plan. There are changes taking place at the property which have not been thoroughly assessed in advance in order to understand and respond to potential heritage impacts. The major current threat to the integrity and authenticity of the property arises from current and potential future projects, including port projects, and the absence, to date, of a rigorous process of Heritage Impact Assessment, which can inform project decision-making, design, implementation, and mitigation measures. These are matters that have been addressed in previous Decisions of the World Heritage Committee, and by previous Missions, and the need for action and change is now urgent.

Recommendations

- a. Efforts regarding the removal of illegal additions to buildings and to improving the urban decorum through the replacement of shop signs and external stands, etc. should continue.
- b. The decay of the historic buildings and their decorative features should be mapped by appropriately skilled conservation professionals, identifying in particular any emergency conservation situations that need immediate resolution. Thereafter, ongoing monitoring by conservation specialists of the conditions of the historic buildings needs to take place to ensure that the vernacular and religious buildings are maintained over time. Particular attention should also be paid to the decorative features of the churches so that vulnerable elements, such as the ship graffiti, are conserved as significant attributes that convey OUV.
- c. Efforts should be made to secure funding for the more extensive conservation interventions required at, for example, the Church of St Michael and St Gabriel the Archangels.
- d. The local community should be encouraged to remain resident within the peninsula in order to avoid problems found in other historic town centres of gentrification or the phenomenon of losing long-term residents to create temporary visitor accommodation. It might therefore be advisable to explore how heritage might be used to revitalize local craft traditions and support sustainable development, and how services required by residents might be encouraged (e.g. locally-sourced food shops instead of more souvenir shops). Traditional livelihoods, knowledge systems (particularly related to maintenance) and uses of spaces within the old town should also be encouraged.
- e. Erosion of the Nessebar peninsula needs monitoring to ensure that the form of the peninsula is preserved or appropriate changes are allowed. Where reinforcement works take place these must take into consideration heritage along the coastline and underwater.

3. Examine existing and proposed projects and development intentions within the boundaries of the Ancient City of Nessebar and its buffer zone, including the territorial waters of the peninsula, and providing preliminary insights on the scope of analysis needed to assess their impacts.

As noted above, the major current threat to the integrity and authenticity of the property arises from current and potential future projects, including port projects, and the absence, to date, of a rigorous process of Heritage Impact Assessment.

Recommendations

- a. It is essential to implement thorough and comprehensive Heritage Impact Assessment (HIA) framework which includes a comprehensive values analysis, consideration of potential

effects on heritage values, authenticity and integrity, and accords with the 2011 *ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*. Where relevant, all information regarding underwater cultural heritage and natural heritage needs to be taken into consideration during any such values assessment and, if necessary, identification and assessment of potential sites should be undertaken by developing appropriate evaluation projects following the Rules of the Annex of the 2001 Convention. This framework would then consider developments within the World Heritage property and also establish a sophisticated understanding of how change in the buffer zone and wider setting may also have positive and negative impacts on OUV and other values. This could then be used as a baseline for efficiently evaluating all significant change and development projects around Nessebar

- b. Any future plans for extending or upgrading transport infrastructure, including any plans for developing the ports, should be evaluated through an HIA to ensure that these changes are consistent with retaining the OUV of the property.
- c. Any current or future plans for utilities infrastructures within the World Heritage property should continue to take into consideration the physical impact that they might have on OUV and its attributes, particularly the archaeological remains that lie under the old town of Nessebar but also on the mainland opposite, where necropolises and other historic remains have been found.

4. Examine in detail the current conditions of the two existing ports (Port Severna Buna and Port Terminal Nessebar – part of Port Burgas – a port of national significance (southern part of the peninsula) and projects for their upgrading and identify potential threats to the Outstanding Universal Value of the property arising from these projects.

The changes to proposals for the Severna Buna Fishing Port are welcome, as is the intention to make better use of existing facilities, rather than construct new infrastructure. It will be important that new facilities, including the floating docks, are of an appropriate design and are assessed through preparation of a Heritage Impact Assessment before construction commences.

At present, there are no proposals for the Nessebar Port Terminal that are a cause for concern. However, the Marina Nessebar should be investigated immediately as the scope and technical details of the project seems to be unknown to the heritage authorities and no assessment has been made on its impact on OUV or underwater heritage. No further works should proceed unless and until a comprehensive Heritage Impact Assessment has been prepared.

Although the passenger terminal precinct has not been subject to any actions to date which adversely affect the OUV of the property, the precinct is vulnerable to neglect and to the potential for inappropriate developments, which could arise from the interests of the private concessionaire. It is therefore important that any new proposals be preceded by a thorough Heritage Impact Assessment.

Recommendations

- a. An HIA should be carried out for any future development proposals for the Port Terminal but it is particularly urgent that assessment is carried out now to understand the nature and extent of impact of the works currently underway at the Marina.
- b. In view of the significance of underwater features, works which may affect them should be preceded by underwater survey and assessment, as well as being accompanied by archaeological supervision.

- 5. Assess the results of underwater archaeological research carried out in the past, with a special focus on the most recent research programs, including those conducted during 2016-2017, as well as assess, as far as possible the actual underwater archaeological remains present through a survey, and provide recommendations for potential of the submerged setting of Nessebar and assess measures to be undertaken to minimize impacts on the submerged remains in line with Article 5 of the 2001 Convention.**

The underwater cultural heritage component of the Advisory mission initially focused on the project of expansion of the fishing port northwest of the city, but was expanded to evaluate all archaeological structures found underwater in the Ancient City of Nessebar. The five days of on-site mission were devoted to dives for evaluating the submerged structures (sites off the south-east and north-west of the peninsula), working sessions and conference sessions with heritage and municipal authorities and archaeological researchers, as well as visits to museum institutions.

In addition to the underwater archaeological inspections, the STAB experts examined the maritime graffiti in two of the Byzantine churches, the Church of St Stephen (built in the 11th century, later rebuilt in the 16th century) and the Church of St Spas (built in the 17th century).

Recommendations

- a. A national action plan should be established for implementation of the 2001 Convention together with a coordination scheme between local, regional and national competent administrations as well as with other relevant private and civil society entities for better research and protection of the underwater cultural heritage;
- b. The research programme for the underwater cultural heritage of the Ancient City of Nessebar, should be reinforced and expanded as an integral part of developing the national inventory of underwater cultural heritage, as foreseen by Article 22 of the 2001 Convention, under the observance of the Rules of its Annex. This should follow four main lines of action: i) a documentation review (according to the preservation of and the possibility of accessing the primary data and interpreted plans of the 1960-84 research); ii) the development and maintenance of a Geographical Information System (GIS); iii) the continuation of underwater archaeological surveys around the Nessebar peninsula; and iv) the development of specific studies for the conservation and enhancement of the underwater archaeological remains of the Ancient City of Nessebar;
- c. A feasibility study on the underwater archaeological sites should be launched to explore how to make them accessible to the public through 'maritime archaeological routes' and other interpretation initiatives that could include, for instance, the maritime graffiti found in the Nessebar churches, providing new perspectives on the relationship between the Ancient City of Nessebar and its maritime landscape;
- d. A digitalization programme should be implemented for all maritime graffiti found in the Nessebar churches, including a conservation assessment to identify emergency measures to be taken to avoid any loss of the graffiti and the wall paintings they are on, while longer-term conservation plans take place as part of Bulgaria's World Heritage commitments;
- e. A capacity-building programme should be established in cooperation with UNESCO and its partners to improve the identification, evaluation, research and protection of the underwater cultural heritage in Bulgaria;

- f. Concerning the assessment of the evaluation carried out and the OUV of the Ancient City of Nessebar as inscribed in the World Heritage List, the State Party and its competent authorities should consider proposing a minor boundary modification to include the underwater cultural heritage found in the buffer zone within the World Heritage property, given that it is an attribute of the OUV and given that the issue of boundaries is being reviewed as part of the revision of the draft Management Plan.

- 6. In order to increase the capacity of Bulgarian experts with regard to Heritage Impact Assessment for World Heritage properties, with a particular focus on the Ancient City of Nessebar, ICOMOS shall conduct training for a team of Bulgarian experts (urban architect, historian, representative of Nessebar Municipality from the 'Nessebar – World Heritage' municipal unit and/or the 'Ancient City of Nessebar' museum) in order to enable them to coordinate and/or carry out a heritage impact assessment of the impact of the modernization project of the existing Fish Port 'Severna Buna – Nessebar'.**

A successful program of training in the process of Heritage Impact Assessment (HIA) was largely based on explaining the methodology outlined in the 2011 *ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* document, illustrated with examples of HIAs carried out at other World Heritage properties.

Recommendation

- a. Formal feedback should be sought from participants to evaluate the success of these training sessions on Heritage Impact Assessment and to establish any other professional requirements that should be addressed in future.

- 7. In order to increase the capacity of Bulgarian experts with regard to the preservation and management of underwater cultural heritage the STAB experts shall carry out training on coastal management.**

The training day on Underwater Cultural Heritage focused mainly on the management of underwater and coastal archaeological sites and on the national implementation of the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage.

Recommendations

- a. Training on other issues related to requirements of managing a World Heritage property and underwater cultural heritage should be organized, in particular, change management and sustainable development. The State Party is encouraged to invite the Advisory Bodies to support further capacity building for Bulgaria in the future.
- b. This training experience could be considered as a preliminary phase of the consultation process that forms part of the HIA methodology and more such exercises could be carried out to take this participatory approach forward so as to best protect OUV. The State Party is encouraged to organize more opportunities for representatives of all the relevant authorities to continue to work together to take the HIA forward.

- 8. Assist the State Party with specific advice and recommendations to address the problems with adoption of the draft Conservation and Management Plan of the Ancient City of Nessebar, so as to achieve the final approval of the Conservation and Management Plan and put it in place, and to take measures to implement the Committee's decision 41.COM.7B.43 as well as the 2001 Convention's provision.**

There is still no Management Plan in place for the property. Concerns about this situation have been raised on numerous previous occasions, by the World Heritage Committee and in mission reports. Although the draft Management Plan was reviewed favourably by ICOMOS, it has not proved possible to finalise, adopt and implement it, owing to advice from the State Party Ministry of Finance regarding the proposed National Fund "Nessebar-World Heritage" and Value Added Tax exemption for Nessebar residents, and from the Ministry of Culture regarding the proposed separate Act for preservation and development of the Ancient City of Nessebar. There are also unresolved inconsistencies between the boundaries of the property and its buffer zone as shown in the draft Management Plan and those of the statutory protection regimes of the State Party.

- a. The State Party is urged to find solutions to the outstanding issues as soon as possible so that the Management Plan can be formally adopted. A staged approach is recommended, comprising:
- Amendment of the current draft Management Plan to reflect the current statutory regime, available resources and relevant Mission recommendations (2010 to 2017), and incorporating a first 5-year implementation plan;
 - Adoption and implementation of this preliminary 5-year Management Plan as a matter of great urgency;
 - Preparation of a second-phase 20-year Management Plan, which addresses required longer-term institutional, statutory and resourcing issues, including appropriate mechanisms for providing resources for conservation and incentives and support for Nessebar residents, and the possibility of statutory changes directed at preservation and development of the Ancient City of Nessebar in a manner which conserves the OUV of the property.
- b. The State Party is urged to overcome the lack of progress and agreement regarding management and urban planning for the World Heritage property, its buffer zone and setting in order to ensure that appropriate regulations, including a detailed Master Plan and a Conservation Plan, are permanently in place.

ANNEXES

Annex 1. Terms of reference

Annex 2. Mission programme

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Annex 1. Terms of reference

JOINT MISSION

UNESCO World Heritage Centre – ICOMOS Advisory Mission for the World Heritage Property of Ancient City of Nessebar (Bulgaria)

UNESCO Scientific and Technical Advisory Body (STAB) to the 2001 Convention on the Protection of the Underwater Cultural Heritage Mission to the Underwater Cultural Heritage of Ancient City of Nessebar (Bulgaria)

Draft Terms of Reference

The State Party of Bulgaria has invited a UNESCO World Heritage Centre – ICOMOS and the Scientific and Technical Advisory Body Mission (STAB) to the 2001 Convention to organize a joint advisory mission to the Ancient City of Nessebar to assess an infrastructure project proposal and to assist in building capacity for Heritage Impact Assessment.

The joint advisory mission shall:

1. Assess the state of conservation of the property, having particular regard to its evolving trends and current pressures;
2. Identify the vulnerabilities, existing and potential threats to the Outstanding Universal Value of the property;
3. Examine existing and proposed projects and development intentions within the boundaries of the Ancient City of Nessebar and its buffer zone, including the territorial waters of the peninsula, and providing preliminary insights on the scope of analysis needed to assess their impacts;
4. Examine in detail the current conditions of the two existing ports (Port Severna Buna and Port Terminal Nessebar – part of Port Burgas – a port of national significance (southern part of the peninsula) and projects for their upgrading and identify potential threats to the Outstanding Universal Value of the property arising from these projects;
5. Assess the results of underwater archaeological research carried out in the past, with a special focus on the most recent research programs, including those conducted during 2016 – 2017, as well as assess, as far as possible the actual underwater archaeological remains present through a survey, and provide recommendations for potential additional research that may be needed to appraise the archaeological potential of the submerged setting of Nessebar and assess measures to be undertaken to minimize impacts on the submerged remains in line with Article 5 of the 2001 Convention;
6. In order to increase the capacity of Bulgarian experts with regard to Heritage Impact Assessment for World Heritage properties, with a particular focus on the Ancient City of Nessebar, ICOMOS shall conduct training for a team of Bulgarian experts (urban architect, historian, representative of Nessebar Municipality from the “Nessebar - World Heritage” municipal unit and/or the “Ancient City of Nessebar” museum) in order to enable them to coordinate and/or carry out a heritage impact assessment of the impact of the modernization project of the existing Fishing Port “Severna Buna – Nessebar”. This training in Heritage Impact Assessment should be constructed around the 2011 ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties;

7. In order to increase the capacity of Bulgarian experts with regard to the preservation and management of underwater cultural heritage the STAB experts shall carry out a training on coastal management;
8. Assist the State Party with specific advice and recommendations to address the problems with adoption of the draft Conservation and Management Plan of the Ancient City of Nessebar, so as to achieve the final approval of the Conservation and Management Plan and put it in place, and to take measures to implement the Committee's decision 41.COM.7B.43 as well as the 2001 Convention's provisions.

In order to achieve these objectives, the advisory mission experts shall be provided with and review all necessary technical documents, undertake site visits, including an inspection survey to the submerged archaeological remains, and participate in technical on-site meetings with the Bulgarian authorities and authors of the projects, in order to gain insights into the context and justification for the proposed projects. The mission experts should also meet with other stakeholders, including members of civil society, in order to understand eventual community concerns about the proposed projects.

In preparation for the advisory mission, the State Party shall provide the experts, in advance of the mission, with all necessary background technical material on the projects. The State Party shall also make all necessary arrangements for the training of Bulgarian experts, including particularly ensuring that the relevant personnel are available at the required time.

In what regards the underwater archaeological surveys the State Party shall provide all detailed reports of previous archaeological research, all bathymetric and geophysical data in the area concerned, as well as all the necessary equipment to perform the inspection survey, medical insurance and backup.

Based on site visits and meetings with representative of the State Party, the advisory mission shall prepare for the State Party a joint report (WHC-ICOMOS-STAB) including analysis of the above-mentioned points and recommendations. The advisory mission shall deliver this report by 25th January 2018.

Annex 2. Mission programme

Sunday 26 November 2017

Arrival of representatives of the Centre for Underwater Archaeology and National Archaeological Institute with Museum at the Bulgarian Academy of Sciences.

Arrival of Ms Sarah Court, ICOMOS.

Monday 27 November 2017

Preliminary site visit of Ms Sarah Court to Ancient Nessebar, accompanied by Martin Zhelev from the Ancient Nessebar Museum and Nikolay Oreshkev, Chief Architect at Nessebar Municipality responsible for the historic town.

Arrival of UNESCO and STAB experts.

Arrival of Deputy Minister Amelia Gesheva; arch. Krassimir Todorov - Director of the National Institute of Immovable Cultural Heritage, two experts from NICH for participation in the training; from the Ministry of Culture - arch. Ulyana Maleeva and arch. Elina Hadjieva; a translator.

18:00: Preliminary meeting with all those present at the hotel, including the mission specialists, public officials from the Ministry of Culture and the National Institute and representatives of Nessebar Municipality.

20:00: Working dinner.

Tuesday 28 November 2017

09:30: Meeting of experts and guests in the building of the old town hall in Ancient Nessebar; a tour of the Ancient city of Nessebar for acquainting with the Port Terminal, the North Busi fishing port, town-planning structure, archaeological sites, medieval churches, residential buildings of folk architecture, new construction and a visit of the Museum "Ancient Nessebar"; accompanied by a representative of the Municipality of Nessebar and the Museum "Ancient Nessebar".

13:00: Working lunch.

Arrival of Dr Nikolay Nenov, Director of the Regional Museum of History in Rousse and Mrs. Boryana Mateva, Director of the Historical Museum - Isperih, in connection with the training for realization of an assessment of the impact of projects on the exceptional world value of World Heritage Sites.

15:00 (parallel sessions): Meetings in Nessebar Municipality with the participation of representatives of Nessebar Municipality, "Ancient City of Nessebar" Municipal Unit, "Ancient City of Nessebar" Museum, experts from the Ministry of Transport, Information Technology and Communications, the Ministry of Culture, Regional Directorate for National Construction Control – Burgas, the Inspectorate for Protection of Cultural Heritage, the authors of the project for the Fishing Port and representatives of the civil society with regard to the two ports.

15:00 (parallel sessions): start of underwater survey.

Departure of Mrs. Amelia Gesheva for Sofia.

20:00: Working dinner.

Arrival of final STAB expert.

Wednesday 29 November 2017

9:00 (parallel sessions): Training on Heritage Impact Assessment by ICOMOS and UNESCO mission specialists for Bulgarian experts.

9.00 (parallel sessions): Continuation of underwater survey.

14:00: Working lunch.

15:00: Continuation of training.

16:00: Departure of the Director of NIICH and Director of the Cultural Heritage, Museums and Fine Arts Directorate, Ministry of Culture for Sofia.

20:00: Working dinner.

Thursday 30 November 2017

09:30: Training by UNESCO and STAB experts on the Convention for Protection of Underwater Cultural Heritage of Bulgarian experts and representatives of the Municipality of Nessebar.

Departure of Ms Sarah Court.

13:00: Working lunch.

Departure of Dr Nikolay Nenov, Director of the Regional Museum of History - Rousse and Ms Boryana Mateva, Director of the Historical Museum – Isperih.

20:00: Working dinner.

Friday 1 December 2017

09:30: Continuation of the underwater survey.

13:30: Working lunch.

Departure of NIICH experts to Sofia.

15:00: Continuation of the review by experts on the Convention for the Protection of Underwater Cultural Heritage in along with a team from the Centre for Underwater Archaeology of the Archaeological Structures in the Ancient city of Nessebar.

20:00: Working dinner.

Saturday 2 December 2017

09:30: Continuation of the review by experts on the Convention for the Protection of Underwater Cultural Heritage in along with a team from the Centre for Underwater Archaeology of the Archaeological Structures in the Ancient City of Nessebar.

Departure of one STAB expert.

13:00: Working lunch.

15:00: Continuation of the review by experts on the Convention for the Protection of Underwater Cultural Heritage in along with a team from the Centre for Underwater Archaeology of the Archaeological Structures in the Ancient City of Nessebar.

20:00: Working dinner.

Sunday 3 December 2017

Departure of the STAB experts of the Convention for the Protection of Underwater Cultural Heritage and the Bulgarian participants depart for Sofia.

Annex 3. List of people met during the mission

Qna Aleksieva, Concessions Directorate, Ministry of Transport

Maria Arbova-Demireva, CDE Regional Inspector Burgas, Inspectorate for Protectorate of Cultural Heritage

Dilna Decheva, Regional Directorate for National Construction Control of Burgas

Kalin Dimitrov, Director, Centre for Underwater Archaeology

Nikolay Dimitrov, Mayor, Nessebar Municipality

Biliana Dimitrova, Concessionaire for the Nessebar Port Terminal

Bojin Djinkov, Board Member, Community House "Chitalishte Mesemvria 2015"

Maria Gancheva, Public Relations, Nessebar Municipality

Kostadin Georgiev, Designer of the fishing port project

Pavel Georgiev, Maritime Archaeologist, Centre for Underwater Archaeology

Zdravka Georgieva, Maritime Archaeologist, Centre for Underwater Archaeology

Filipa Guguchkova, Designer of the fishing port project

Elina Hadzhieva, Senior Expert, Cultural Heritage Directorate, Ministry of Culture

Kiril Jeglov, "Mena" Fishing Association

Klara Karavasileva, Nessebar Municipality

Petq Kiashkina, Director, Ancient Nessebar Museum

Lazar Kondov, lawyer, Nessebar

Milena Kratchanova, National Institute for Immovable Cultural Heritage and Abstracta Ltd

Albena Lazarova, Concessions Directorate, Ministry of Transport

Uliana Maleeva, Director, Cultural Heritage Directorate, Ministry of Culture

Andon Nenov, Public Relations, Nessebar Municipality

Nikolay Nenov, Director, Rousse Regional Museum

Maria Nikolaeva, Archaeologist, Historical Museum of Isparih

Nikolay Oreshkev, Chief Architect, Nessebar Municipality

Nayden Prahov, Chief Assistant, National Archaeological Institute with Museum

Mihail Pramatarov, Chief Specialist, National Institute for Immovable Cultural Heritage

Qni Qnulov, Director, Nessebar Port

Vladimir Rachev, Regional Inspector for the Protection of Cultural Heritage, Ministry of Culture

Vaska Racheva, Architect

Georgy Shishmanidov, Mesambriapontica, Community House “Chitalishte Mesemvria 2015”

Evtelpa Stoicheva, Archaeologist

Krasimir Todorov, Managing Director, National Institute for Immovable Cultural Heritage

Petar Todorov, Finance Officer, Nessebar Municipality

Martin Zhelev, Archaeologist, Ancient Nessebar Museum

Annex 4. Training programme

Wednesday 29 November 2017

09.30: Welcome and introduction to the training

09.45: Presentation on 'The Heritage Impact Assessment for the Old Town of Galle and its Fortifications (Sri Lanka)' presented by Sarah Court (ICOMOS)

10.45: Working session: Nessebar's values and attributes

11.00: Coffee break

11.15: Presentation on 'Best practices in the research, management and protection of the Underwater Cultural Heritage: the impact of the 2001 Convention and the work of UNESCO' presented by Arturo Rey da Silva (UNESCO)

12.00: Presentation on 'The Heritage Impact Assessment for Villa Adriana, Tivoli (Italy)' presented by Sarah Court (ICOMOS)

13.00: Working session: Nessebar's stakeholders and the values they hold

13.30: Lunch break

15.30: Presentation on 'Heritage Impact Assessment: overview and the ICOMOS Guidance' presented by Sarah Court (ICOMOS)

16.30: Working session: Change in Nessebar – positive and negative impacts

16.45: Coffee break

17.00: Presentation on 'Tools and Resources' presented by Sarah Court (ICOMOS)

17.30: Discussion and close of work

Thursday 30 November 2017

10.00: Presentation on 'Implementation and practical use of the 2001 UNESCO Convention on UCH: The experience of France' presented by Souen Fontaine (DRASSM)

10.45: Presentation on 'Cultural Heritage Management in Sazan Island, Albania', presented by Auron Tare (STAB Member)

11.30: Coffee break

12.00: Presentation on 'Alpine lakes of Savoie and UNESCO World Heritage: protection, monitoring and presentation of pile dwellings' presented by Yves Billaud (DRASSM)

12.30: Presentation on 'Archaeological researches in Nessebar 1960-2017' presented by Kalin Dimitrov (Centre for Underwater Archaeology)

13.00: Presentation on 'Underwater Cultural Heritage in Bulgaria' presented by Kalin Dimitrov (Centre for Underwater Archaeology)

Annex 5. List of people who attended training

Maria Arbova-Demireva, Regional Inspector, Southeast Region of Bulgaria

Kalin Dimitrov, Director, Centre for Underwater Archaeology

Pavel Georgiev, Centre for Underwater Archaeology

Zdravka Georgieva, Centre for Underwater Archaeology

Elina Hadzhieva, Ministry of Culture

Klara Karavasileva, Nessebar Municipality

Milena Krachanova, National Institute of Immovable Heritage and Abstracta Ltd

Uliana Maleeva, Ministry of Culture

Nikolay Nenov, Director, Rousse Regional Museum

Maria Nikolaeva, Archaeologist, Historical Museum of Isperih

Nikolay Oreshkev, Chief Architect, Nessebar Municipality

Naiden Prahov, National Archaeological Institute with Museum

Mihail Pramatarov, National Institute of Immovable Heritage

Qni Qnulov, Director, Nessebar Port

Vaska Racheva, architect

Georgy Shishmanidov, Mesambriapontica, Chitalishte Mesemvria 2015

Evtelpa Stoicheva

Krasimir Todorov, Director, National Institute of Immovable Heritage

Martin Zhelev, Archaeologist, Ancient Nessebar Museum

2017

Decision 41 COM 7B.43

Ancient City of Nessebar (Bulgaria) (C 217)

The World Heritage Committee,

1. Having examined Document WHC/17/41.COM/7B.Add,
2. Recalling Decision **37 COM 7B.73**, adopted at its 37th session (Phnom Penh, 2013),
3. Acknowledges that some progress has been achieved by the State Party in implementing the recommendations of the Committee and the 2010, 2012 and 2015 missions, as well as the commitment demonstrated towards the protection the property and the collaborative dialogue established with ICOMOS;
4. Welcomes that the reconstruction/enlargement plan of the existing fishing port “Severna Buna-Nessebar” was abandoned and requests the State Party to carry out a HIA for the modernization of the existing fishing port in conformity with the ICOMOS Guidelines on HIAs for World Heritage cultural properties and submit it to the World Heritage Centre for review by the Advisory Bodies before any decision is made;
5. Express its concern regarding proposed infrastructure projects, incompatible with the values, attributes and vulnerabilities of the property, as well as development approach based on mass tourism, which are representing potential threats to the Outstanding Universal Value (OUV) of the property;
6. Urges the State Party to halt any unsustainable form of development, such as to open the Nessebar Port Terminal for large ships, and also requests the State Party to recover the terminal area using careful and light intervention compatible with the World Heritage status of the property;
7. Invites the State Party to devise a radically different strategy for the sustainable and compatible development of Nessebar that reduces development pressure, by relocating plans and projects for any cruise terminals, or tourist, commercial or fishing ports for large ships elsewhere along the coast outside the visibility area from Nessebar and to develop a sustainable mobility plan to ensure the smooth circulation of residents, visitors and goods;
8. Also urges that the State Party introduce all relevant provisions regarding the World Heritage into national legislation, as well as develop and adopt an OUV-based policy, appropriate regulatory instruments and mechanisms to prevent, at the planning and programming stage, inappropriate developments, which could jeopardize the property’s OUV and could represent a potential danger, in conformity with Paragraph 179 of the *Operational Guidelines*;
9. Also invites the State Party to strengthen the property’s management system, address and resolve weaknesses in management, by reinforcing existing institutional framework and establishing an all relevant high-level inter-ministerial committee, decision-making bodies and working groups that develop and adopt a vision for the future of the property, including strategic programme for its implementation;
10. Requests the State Party to adopt all relevant measures and plans (Management plan, Master Plan and Conservation Plan), as well as to enforce the protection regimes and

the conservation prescriptions, to support the appropriate implementation of its decisions in order to prevent any threats to its OUV;

11. Also requests the State Party to invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property to assess its state of conservation and ascertain the progress made by the State Party ;
12. Further requests the State Party to submit to the World Heritage Centre, by **1 December 2018**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 43rd session in 2019, **with a view to considering, in case of confirmation of the ascertained or potential danger to Outstanding Universal Value, the possible inscription on the List of World Heritage in Danger**

2013

Decision 37 COM 7B.73

Ancient City of Nessebar (Bulgaria) (C 217)

The World Heritage Committee,

1. Having examined Document WHC-13/37.COM/7B,
2. Recalling Decision **35 COM 7B.87**, adopted at its 35th session (UNESCO, 2011),
3. Welcomes the progress made by the State Party in the implementation of its previous decisions and urges the State Party to adopt and implement the Management Plan;
4. Takes note of the results of the November 2012 ICOMOS reactive monitoring mission to the property and requests the State Party to implement its recommendations, in particular:
 - a) Approve effective legislative and regulatory measures, including those for new construction and development, for the management of the buffer zone and the surrounding sea coastline and for the regulation of tourism activities,
 - b) Maintain the moratorium on any new constructions within the World Heritage property, its buffer zone and at the surrounding sea coastline until the development and approval of an Urban Master Plan and a Conservation Plan,
 - c) Strengthen the protection status of the sea coastline and include mandatory heritage impact assessments for proposed developments,
 - d) Make operational the proposed management system, including adequate staffing and resources for the implementation of the proposed projects,
 - e) Implement priority conservation and maintenance works, as identified in the Management Plan, for the historic buildings and archaeological sites, and prepare a technical manual for conservation, rehabilitation and restoration,
 - f) Develop capacity building activities for all professional staff involved with the conservation, protection and management of the property;
5. Also requests the State Party to submit to the World Heritage Centre, by **1 February 2015**, an updated report on the state of conservation of the property and the implementation of the above.

2011

Decision 35 COM 7B.87

Ancient City of Nessebar (Bulgaria) (C 217)

The World Heritage Committee,

1. Having examined Document WHC-11/35.COM/7B.Add,
2. Recalling Decision **34 COM 7B.81**, adopted at its 34th session (Brasilia, 2010),
3. Acknowledges the State Party detailed report and the efforts made to launch policy and legislative initiatives intended to enhance protection of the World Heritage property, as well as the strong commitment of the State Party to improve measures in place for the conservation of the World Heritage property;
4. Notes with appreciation that the municipality suspended the issuing of building permits in the protected area and requests the State Party to declare a temporary construction moratorium within the buffer zone of the property and its sea coast line prior to the approval of adequate and effective protective juridical regulations, and the establishment of effective control mechanisms and institutional frameworks among all stakeholders involved in the management and protection of the Ancient City of Nessebar;
5. Also notes that the continued absence of an appropriate planning, monitoring, management and conservation mechanisms could pose a threat to the property's Outstanding Universal Value, as defined in Paragraph 179 (b) of the Operational Guidelines;
6. Also requests the State Party to implement all the recommendations of the 2010 joint World Heritage Centre/ICOMOS reactive monitoring mission to the property, including:
 - a) immediately establish regulations for tourism activities, movable facilities and components of urban infrastructure, advertising activity and open-air commercial activity,
 - b) fully develop and implement all planning, policy and legislative initiatives recently launched or planned by the State Party including preparation, adoption and implementation of a management plan (including integrated multi-institutional tourism strategy and guidelines for the use of historic buildings and monuments), urban master plan and a conservation master plan of monuments and archaeological sites,
 - c) ensure a permanent monitoring of the property with a view of halting and preventing any threats to its Outstanding Universal Value,
 - d) establish a protection regime for the buffer zone of the property, as well as of the sea coastline and strengthen the system of development control within it,
 - e) ensure that all tourism development plans be subservient to the overall Master Plan for the inscribed property and that control mechanisms be established for the buffer zone and be developed in ways which will not negatively impact on the Outstanding Universal Value, of the property,
 - f) remove or demolish all illegal and inappropriate structures within the property and its buffer zone;
7. Further requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission, prior to its 37th session in 2013, to review the state of conservation of the property, the implementation of measures which adequately ensure

the authenticity and integrity of the property and its World Heritage values, - and the existence of an integrated and comprehensive management plan for the World Heritage property, and specifically the State Party response to all 2010 mission recommendations;

8. Requests furthermore the State Party to submit to the World Heritage Centre by **1 February 2013**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 37th session in 2013.

2010

Decision 34 COM 7B.81

Ancient City of Nessebar (Bulgaria) (C 217)

The World Heritage Committee,

1. Having examined Document WHC-10/34.COM/7B.Add,
2. Takes note of the detailed information provided by the State Party on the state of conservation of the property;
3. Expresses its deep concern regarding the overall state of conservation of the property, and in particular, serious changes due to unacceptable development of the urban fabric that are a threat to the Outstanding Universal Value, integrity and authenticity of the property;
4. Urges the State Party to immediately adopt all necessary measures aiming to ensure the safeguarding of the Outstanding Universal Value, integrity and authenticity of the property, monitoring and survey of the urban fabric, preparation, adoption and implementation of a management plan (including tourism strategy and guidelines for the use of historic buildings and monuments), urban master plan and a conservation master plan of monuments and archaeological sites;
5. Also urges the State Party and the Municipality authorities to immediately stop any development projects which may affect the Outstanding Universal Value, integrity and authenticity of the property, and to inform the World Heritage Centre, in accordance with Paragraph 172 of the *Operational Guidelines*, on any intention to undertake or to authorize such projects;
6. Requests the State Party to invite a joint World Heritage Centre/ICOMOS reactive monitoring mission to the property in 2010 to assess the state of conservation of the property;
7. Also requests the State Party to submit to the World Heritage Centre by **1 February 2011**, a detailed progress report on the state of conservation of the property, including the results of monitoring and survey of the urban fabric, monuments and archaeological sites, the approved management and urban master plans, conservation master plan of monuments and archaeological sites, and a report on the use of the historic buildings and monuments, for examination by the World Heritage Committee at its 35th session in 2011, **with a view to considering, in the absence of substantial progress, the possible inscription of the property on the List of World Heritage in Danger.**

REPORT OF THE JOINT UNESCO-ICOMOS REACTIVE MONITORING MISSION TO THE ANCIENT CITY OF NESSEBAR, BULGARIA, From 29 November to 2 December 2010

CONCLUSIONS AND RECOMMENDATIONS

Taking into account that the State Party initiated a process in order to prevent serious deterioration of architectural and urban planning coherence, as well as recent improvement in protective legislation which permits renewal of the process of ensuring adequate protection of the World Heritage property, the mission recommends to the World Heritage Committee not to consider the possible inscription of the property on the List of World Heritage in Danger.

However, the mission considers that if the necessary measures are not implemented by the authorities as a matter of urgency, the continued absence of an appropriate master plan for the City of Nessebar which specifies particular regulations and norms adopted to the status of the World Heritage property and aims to maintain the present balance between the natural and built environment, along with a conservation master plan with a specific programme of protection, including the archaeological remains in the city and underwater, the absence of a Management Plan for the property, including tourism management policy with regulations for movable facilities and components of urban infrastructure, as well as the absence of advertising activity and open-air commercial activity to be developed in harmony with local traditions and knowledge, could propose threats to the property's Outstanding Universal Value (OUV), as defined in paragraph 179 (b) of the Operational Guidelines (OG).

The general recommendation of the mission concerns the need to urgently address issues of the overall management framework and standards for the cultural World Heritage properties in Bulgaria through approval of appropriate legal documents and regulations for the protection and management of World Heritage properties that meet the State Party's obligations to the Convention.

In light of the above assessment the mission considers that immediate measures should be taken as a matter of urgency to:

- Immediately establish regulations for tourism activities, movable facilities and components of urban infrastructure, advertising activity and open-air commercial activity. The mission recommends that the City-Museum Area Project should be developed in order to establish a balance between conservation, social needs and the identity of local communities;
- Immediately put in place a moratorium on any new constructions within the World Heritage property, as well as halt the allowance of new construction permits within the World Heritage property and surrounding sea coast area, which could visually affect the property, prior to the preparation of a visual impact study for development projects, the approval of adequate and effective protective juridical regulations, and the establishment of effective control mechanisms and institutional frameworks among all stakeholders involved in the management and protection of the Ancient City of Nessebar;

In order to ensure long term protection of the property, the mission further recommends that the State Party, before the 37th session (June-July 2013) of the World Heritage Committee:

- Urgently prepare and approve all necessary documents and regulations which would prevent any threats which could have deleterious effects on the property's inherent characteristics, and any

weakening of town planning coherence, deterioration of urban space and the natural environment, and loss of historical authenticity and cultural significance.

- Establish an overall management strategy and coordination mechanism for the property;
- Develop a new Master Plan of the City of Nessebar which specifies particular regulations and norms, including regulations relating to land use, guidelines for future developments adopted to the status of the World Heritage property and aiming to maintain the balance between the natural and built environment, along with a conservation master plan that includes a specific programme for the monitoring and protection of the monuments, vernacular architecture and archaeological remains in the city and underwater within the property and its buffer zone, that would become the basis for a unified conservation policy for the property;
- Clarify the protection status of the sea coastline and the role of the City Municipality in its management as soon as possible in order to ensure long-term visual integrity of the property;
- Develop a study on the environmental and visual impact of all sea coastline developments in regard to the Outstanding Universal Value and visual integrity of the property;
- Establish a comprehensive management system, along with an integrated Management Plan for the property, including a tourism management policy with regulations for movable facilities and components of urban infrastructure, advertising and open-air commercial activity, as well as a Technical Manual for the restoration and use of historic buildings and monuments;
- Develop a comprehensive plan for awareness-raising and outreach for institutional stakeholders, civil society, inhabitants and visitors, such as a World Heritage awareness-raising programme (e.g. “Living World Heritage City”) incorporated into the Management Plan of the property;
- Ensure that development rights on existing private or leased lands within the property are clearly defined and strictly controlled;

The mission further recommends the implementation by the State Party of the following recommendations to ensure compliance with the 1972 Convention:

Inventory:

- Prepare adequate documentation and archiving of all historical monuments and archaeological remains in the form of digital databases necessary for the management, conservation and planning;
- Undertake archaeological and topographic surveys, including archaeological, historical monuments and important landscapes;
- Establish a comprehensive inventory of mural paintings, including a scan system and reference for all historical monuments of the Ancient City of Nessebar.

Coordination between stakeholders

- Establish a Special World Heritage Coordination Unit which could assure and enhance the effective protection of the World Heritage property. Furthermore, the mission recommends the creation of a “Social council” for the protection of the cultural heritage as a consultative body under the municipality in order to enhance the awareness-raising activities and encourage an active involvement of the local community.

Urban development projects:

- Inform the World Heritage Centre of any intention to undertake or authorise major restorations or new constructions within the boundary of the World Heritage property, its buffer zone and sea coast area in compliance with paragraph 172 of the Operational Guidelines;
- Prepare for all new development and infrastructure projects, within and which can be seen from the peninsula, cultural heritage impact assessments using the ICOMOS model, as well as visual impact studies based on topographical analyses and environmental impact studies, thereby recognising the need to protect the visual integrity as well as the balance between the natural and built environment of the World Heritage area.

Restoration activities and protection of the property:

- Ensure the consolidation and long-term preservation of historical monuments of the Ancient City of Nessebar;
- Develop a monitoring mechanism for the physical preservation of buildings and archaeological sites;
- Develop guidelines for new construction, urban design and advertising and information panels in the property and its buffer zone Establish clear guidelines for visitors within the boundaries of World Heritage property;
- Implement the restoration of the frescoes of religious monuments;
- Create a special program on the protection of all components of the archaeological city of the ancient city of Nessebar.
- Find the means to provide financial support to private homeowners to ensure the in-situ conservation of existing historic structures of their 19th century houses which are an important component of the property, and to discourage replacing older structures with new construction and inappropriate annexes;
- Enhance international cooperation in the domain of conservation and restoration of monuments, including archaeological sites in the city and underwater, medieval monuments and 19th century homes in order to provide opportunities for exchanging best practices and methodologies. All work on such monuments and sites should meet international standards and should be preceded by adequate documentation and analysis;
- Inform the World Heritage Centre in advance of all major interventions to key monuments and sites, in accordance with Paragraph 172 of the Operational Guidelines.

Capacity-building:

- Organise a training seminar for all professional staff at the national and municipal levels on international standards for the protection and management of World Heritage properties;
- Implement appropriate training in conservation and management for staff responsible for maintaining the property;
- Strengthen the financial resources and staffing of the national institutions concerned in order to ensure that management can effectively conserve the Outstanding Universal Value of the property;

Awareness-raising:

- Invest in the development of cultural tourism in the property and new initiatives aimed to renew the City-Museum area as a spiritual and unique cultural centre, including the development of the cultural itineraries (e.g. “The City-Museum Area Project,” “Route of Pilgrims Project”), which should improve the overall understanding and interpretation of the site within the framework of a wider awareness-raising programme;
- Enhance international exchanges that promote peninsula World Heritage properties (e.g. twinning collaboration with the World Heritage property of Mont St. Michel in France).

REPORT OF THE ICOMOS REACTIVE MONITORING MISSION TO THE ANCIENT CITY OF NESSEBAR, BULGARIA, From 20 November to 25 November 2012

EXECUTIVE SUMMARY AND LIST OF RECOMMENDATIONS

As requested by the World Heritage Committee at its 35th session, a reactive monitoring mission to the Ancient City of Nessebar was carried out from 20 November to 24 November 2012. The objective of the mission was to review the overall situation of the World Heritage property of the Ancient City of Nessebar (Bulgaria), inscribed on the World Heritage List in 1983, with regard to its state of conservation, as well as to evaluate the status of any development, construction or restoration projects within the property and its buffer zone which might affect the Outstanding Universal Value, authenticity and integrity of the property.

The mission was able to consult with a range of stakeholders, including representatives of the Ministry of Culture, the local authorities of Nessebar. The presence of the Deputy Minister of Culture during the mission was a clear sign of the importance given by the Bulgarian authorities to the implementation of the decisions made by the World Heritage Committee.

The mission wishes to underline the high quality of documents prepared by the national authorities that have been submitted to the World Heritage Centre since 2010, which illustrate a clear understanding of all challenges and problems to address in order to ensure adequate protection and management of the property and its buffer zone.

A large territory surrounding the peninsula and the different components of the property is under control of the Nessebar City Municipality, which plays a crucial role in the monitoring and management of the property and its buffer zone.

Following numerous consultations with all stakeholders and in the light of on-site visits to the World Heritage property, the mission considers that the attributes that convey the Outstanding Universal Value of the property, which warranted inscription on the World Heritage List, have been substantially maintained.

During the site visits, the mission observed that the existing earlier negative urban developments within the property have stopped. Notwithstanding, the mission considers that the property is vulnerable to threats and it expresses its concern regarding potential future urban development activities within the World Heritage property, its buffer zone and the sea coastline area in front of, and around the peninsula prior to the approval of all necessary regulations and documents. The changes at the buffer zone are also a matter to be addressed.

Based on the results from the mission, considers it is critical to finalise the process to approve the management plan and prepare the master and conservation plans according to the management frameworks.

In addition, the following measures should be taken by the national and local authorities as a matter of urgency:

- Maintain a moratorium on any new constructions within the World Heritage property until the master plan and conservation plan are developed and adopted.
- Halt the authorization of new construction permits within the World Heritage property. Halting permits should also be applicable for the surrounding sea coastline area given the potential visual impacts of development on the property. The restriction should be revised upon completion of a visual impact study for development projects, upon the approval of the Manager plan and Master Plan with effective protective juridical regulations and upon the establishment of regulations for tourism activities, movable facilities and components of urban infrastructure, advertising activity and open-air commercial activity;
- Establish and make operational an overall management system, including coordination mechanisms for the property, in accordance to the Management Plan. The management system could consider the establishment of a Special World Heritage Coordination Unit to survey, monitor and manage the property and its buffer zone, as well as to function as specific liaison between the Ministry of Culture and local authorities;
- Develop and enforce a coherent regulatory system to ensure the conservation, management and protection of the property and its buffer zone;
- Adapt planning mechanisms to the boundaries of the property and its buffer zone;
- Develop and adopt an Urban Master Plan for the Ancient City establishing land use goals, including rehabilitation of infrastructure provisions, zoning controls (including no build zones) and strengthening capacity building, community relations and tourism development;
- Establish clear operational plans that strictly limit development at the property and its buffer zone in consideration to management and conservation guidelines and visual impact and heritage impact assessments;
- Formulate a conservation master plan, with clearly defined development rights for private property;
- Improve the availability of accessible and use friendly planning information for the public;
- Create an integrated multi-institutional tourism strategy with regulations governing movable facilities and infrastructure development;
- Prepare a Technical Manual for conservation, rehabilitation and restoration;
- Strengthen the protection status of the sea coastline in relation to the capacity of the municipality, including heritage impact assessments of the any proposed developments on the sea coastline in relation to the property's Outstanding Universal Value;

- Monitor restoration and maintenance works including long term consolidation of the historic monuments of ancient Nessebar and strengthen the monitoring mechanism for physical conservation of buildings and archaeological sites;
- Develop guidelines for new construction, urban design and advertising and information panels in the property and its buffer zone;
- Create a training programme for conservation and management for the personnel responsible for the World Heritage property;
- Develop a special programme for the protection of the property's archaeological resources;
- Identify financial support to assist home owners in rehabilitation work;
- Develop capacity building activities including a World Heritage training seminar for all professional staff involved with World Heritage properties, conservation and management training for maintenance staff.

Taking into account the evaluation of the state of conservation of the property, and considering the efforts made by the State Party to prevent and address its serious deterioration, along with recent improvement in protective legislation, the mission considers that the property does not meet the criteria for inscription on the List of World Heritage in Danger.

It recommends that the State Party submit to the World Heritage Centre by 1 February 2015 a detailed state of conservation progress report including all documents and information on the implementation of all necessary measures and the recommendations of the reactive monitoring missions.

REPORT ON THE ICOMOS ADVISORY MISSION TO ANCIENT CITY OF NESSEBAR (C 217), BULGARIA, FROM 25TH TO 28TH NOVEMBER 2015

Conclusions

The 2012 Mission Report observed that, since the 2010 Mission took place, major steps had been taken to preserve the Property of Nessebar in compliance with the requirements defined by the World Heritage Committee. ICOMOS acknowledges the results achieved by the State Party and the efforts of the Ministry of Culture, which had maintained its strong commitment in protecting the Property and was able to contain the impact to the Outstanding Universal Value of the Ancient City of Nessebar and to reinforce the legal protection. However, the situation seems to have now reached an impasse and no real improvement could be detected regarding the assessment of the conditions of the Property, and the process of deprivation of the Property slowly continues. Despite the best intentions, the Management Plan is still to be approved and there is no evidence that an alternative overall strategy exists to prompt the restoration and enhancement of the Property.

Particular attention is needed in order to assure that the Management Plan is eventually adopted and implemented and it is important that the World Heritage Committee continues to monitor the process of approval and subsequent implementation of the Plan and of the Committee's recommendations. Since the proposed Financial Plan has been cancelled, new solutions should be found in order to support financially the reservation and enhancement projects of the Ancient City. Owners should be technically and financially supported in restoring old houses; at least some of the illegal buildings should be demolished and

incongruous structures removed with the aim of giving a new pace to the protective action; some archaeological sites could be made visible, and part of the seashore and some open green areas rendered more enjoyable. Such actions not only would improve quality, but would testify that there is a real intention for prompting new sustainable development based on culture as an alternative to massive seasonal tourism that is based on the exploitation of the beach and which is motivated by the sea resorts and considers the World Heritage Property as a minor attraction.

Based on the results from the Mission, and partially recalling previous advice, the application of the following is recommended in order to protect the Outstanding Universal Value of the Property:

1. Appropriate financial tools for the implementation of the Management Plan must be provided.
2. After the adoption and approval of the Management Plan, an Urban Master Plan should be drafted, which should be followed by the preparation of a conservation plan for the Ancient City and should cover the whole city as well (see WH Committee Decision: 37 COM 7 B.73, item 4a). Protection measures related to the World Heritage Property and its buffer zone have to be included in the plan provisions, banning further building or port developments. Drafting this plan must be coordinated by an expert who has sufficient experience in architecture and monument protection, in addition to expertise in urban planning.
3. Considering the threats and notwithstanding the pressures for a reduction of the protected areas, the boundaries of the World Heritage property should be extended to include the underwater remains of the previous layouts and structures of the ancient town. In fact, as reported by the report submitted by the State Party in June 2015, “the archaeological remains cover an area that is almost twice as big as the area of the peninsula, since a large part of them are submerged”. The protection status of the sea coastline, as essential part of the inscribed property, should be confirmed and projects should be drawn for a redevelopment compliant with the valorisation of the archaeological sites (see WH Committee Decision: 37 COM 7 B.73, item 4c).
4. Following the recommendations issued in the 2012 Mission Report, it is recommended to review the condition of the buffer zone on the mainland, in order to protect the area of the necropolis and to maintain a green area visible from the peninsula forming the inscribed property.
5. Following detailed indication already contained in the 2012 Mission Report, it is recommended to improve the quality of the seacoast boundary of the inscribed property.
6. To intensify the program for the restoration of the churches that need interventions; when works delay for some financial or technical reason, to assure that the site is maintained in condition compliant with the values of a World Heritage Property and somehow visible by the public.
7. To assure more effective controls and quicker interventions for the removal of plants component and any other tool or object incongruous with the character and quality of the traditional architecture and to issue addresses for the rehabilitation of buildings compatible with the Outstanding Universal Value of the Property.
8. In spite of the assurances about the existence of a Municipal organization devoted to the protection of the Property, it seems that a municipal staff able to constantly monitor the existing buildings and to give technical support to owners and occupants that conduct works of restoration and maintenance is absolutely needed.

9. Therefore, it is indispensable that the local staff of the Inspectorate of Monuments will be dimensionally proportionate to the burden of controlling the assigned area, where the Property is located.

In conclusion, there is seemingly a persistent urgency for augmenting the financial resources available and reinforcing the staffing of the national institutions concerned, in order to ensure that management can effectively conserve the Outstanding Universal Value of the Property and find the means to provide effective support both to private homeowners, local stakeholders and local administrations. It must be assured that the public can keep the direction of a vast action for improving the condition of the World Heritage Property with the participation of those who are concerned.