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# Natural and Cultural Heritage of the Ohrid Region (Albania) No 99quater

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## Official name as proposed by the State Party

Natural and Cultural Heritage of the Ohrid region

## Location

Korça Prefecture, Pogradec Municipality  
Albania

## Brief description

Lake Ohrid in the Western Balkans straddles the border between the Republic of Albania and the North Macedonia. Part of the lake in North Macedonia, together with its hinterland including the town of Ohrid, is inscribed as the Natural and Cultural Heritage of the Ohrid Region, a mixed property. Its culture reflects outstanding religious architecture from the 7<sup>th</sup> to 19<sup>th</sup> centuries, urban structures and vernacular architecture from the 18<sup>th</sup> and 19<sup>th</sup> centuries, all in Ohrid, and a concentration of archaeological remains some within Ohrid and others along the coast that attest to persistent settlement since Neolithic times and include the remains of several 6<sup>th</sup> century Christian basilicas.

The nomination is for a major extension to this property to encompass the Albanian part of Lake Ohrid, including the Drilon springs that feed into the Lake, and to the north-west of the Lake the small Lin Peninsula, together with a strip of shore linking it to the Macedonian border.

On the highpoint of the Lin Peninsula are the remains of a Christian chapel founded in the mid-6<sup>th</sup> century and along parts of its coast a small settlement. In the shallow margins of the lake, three sites offer evidence of prehistoric pile dwellings.

## Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a *site*.

[Note: the property is nominated as a mixed cultural and natural property. IUCN will assess the natural significances, while ICOMOS assesses the cultural significances.]

## 1 Basic data

### Included in the Tentative List

2011

### Background

This is a major trans-boundary modification of the Natural and Cultural Heritage of the Ohrid Region, North Macedonia, inscribed on the World Heritage List in 1979

under natural criterion (iii) (today criterion (vii)) and extended in 1980 under cultural criteria (i), (iii) and (iv), to become a mixed property.

### Consultations and Technical Evaluation Mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the property from 23 to 29 September 2018. This mission was conducted jointly with IUCN.

### Additional information received by ICOMOS

Additional information was received from the State Party on 25 June 2018 relating to a project for developing a Waterscape Park around the Drilon and Tushemisht springs. This has been incorporated into the relevant sections of this evaluation report.

An Interim Report was provided to the State Party on 20 December 2018 summarising the issues identified by the ICOMOS World Heritage Panel and requesting further information on the following:

#### *Lin Church:*

Further details and a synthesis of published material on its plan, style of mosaics, and existing historical documentation, in order to allow a clearer understanding as to how it might relate to the large ensemble of monastic basilicas and churches on the Macedonian side of Lake Ohrid;

#### *Pile dwelling sites:*

A synthesis of what is known of these sites in term of survey, research and any excavations that have been undertaken, and an overview of how they relate to those identified in the Macedonian side of the lake;

#### *Boundaries:*

Why the Tushemisht springs have been excluded from the nominated area;

#### *Buffer Zone:*

How the cultural landscape of the buffer zone will be protected and managed as a cultural support for the nominated areas;

#### *Proposed developments:*

Details of how proposed developments for the Drilon springs and Tushemisht, and for the outskirts of Pogradec relate to the protection in place for the property and the buffer zone;

Details of the railway project between Kičevo and the Lin Peninsula, part of the EU Pan-European Corridor VIII connecting the Black Sea with the Adriatic, including alternative routes that have been considered for the Lin section and what is currently proposed;

#### *Collaboration:*

How collaboration will be fostered between cultural and natural heritage agencies and departments, and how formal collaboration with the North Macedonia will be organized to meet the requirements of the *Operational Guidelines* for a trans-national property.

A response was received from the State Party on 28 February 2019 that provided details on all of the above apart from the proposed railway.

#### **Date of ICOMOS approval of this report**

13 March 2019

## **2 Description of the property**

### **Description and history**

The Albanian part of Lake Ohrid, with a small area around the Drilon Springs, forms the main part of the proposed extension. The terrestrial part is limited to the Lin Peninsula and an area to its north between it and the Macedonian border.

Although the land area nominated for extension is small, the details provided for it in the nomination dossier are comparatively slight.

#### **Lin Peninsula**

On the highest point of the Lin Peninsula are the remains of an Early Christian church discovered in 1967 and excavated until 1972. It was apparently founded in the mid-6<sup>th</sup> century CE, and is said to have continued in use until the medieval period when it was destroyed by fire. Only the floors have survived. Their seven compartments are paved in mosaics with biblical scenes, and stylistic flowers and animals.

The church is one of a few remaining examples of the architecture of the Late Antiquity period in Albania, the others being the baptistery in Butrint, and the recently identified remains of basilicas in Elbasan and Saranda. It is suggested that similarities exist between the plan of the church of Lin and the basilica church of Studenčišta in North Macedonia.

Recent studies of the mosaics by both Macedonian and Albanian scholars are said to show similarities in style and techniques with the early medieval mosaics in the excavated remains of basilicas in the Lychnidos, Studenčišta, Radolišta, Heraclea, Stobi across the lake in North Macedonia. These similarities are seen to suggest that they may all have come from one Ohrid atelier of mosaic and painting masters operating during the Early Christian period. Similar work can also be seen in the mosaics of the Byllis basilica, south Albania, and in a church at Plaošnik, North Macedonia.

Although the information provided by the State Party on the Lin church is either incomplete (in the field of architectural archaeological analysis), or extremely scarce, sparse, and somewhat generic, the Lin church does appear to provide a link with the religious buildings on the Macedonian side of the lake covering the early development of Christian churches in the mid-6<sup>th</sup> century. Quite how this link was established remains unclear in the absence of details of the liturgical relationships between the Lin church and other churches in the hinterland of the lake.

Along the coast of the Lin Peninsula is a small settlement originally for fisher people and farmers, some of whose houses have now been modernized and extended. At the tip of the peninsula the remains of a settlement known as Zagrada were investigated in the 1960-70s when fragments of pottery were found that suggested an Iron Age date.

#### **Pile dwellings**

Remains of three prehistoric pile dwellings and two mediaeval and modern pile sites have been discovered in the lake, three in the vicinity of Lin and two at Udenisht and Pogradec. Two of the Lin sites are prehistoric and one medieval. The prehistoric pile-dwelling site of Udenisht 1 is known only known through a few core samples. At Pogradec, the pile site appears to relate to a jetty which was destroyed in the 20<sup>th</sup> century.

#### **Drilon Springs**

At the south end of the lake near the town of Pogradec, a small area enclosing the Karstic Drilon Springs has been included in the nominated area. These springs form a series of pools in a verdant landscape that has been popular as a tourist destination since the 19<sup>th</sup> century. Further springs a short distance to the east that flow through the lakeshore village of Tushemisht have not been included in the nominated area, although the two springs are described as a '*feeder spring complex*' in the nomination dossier, in which the village of Tushemisht is also linked to Byzantine art and architecture.

It was during the period between the 7<sup>th</sup> and 11<sup>th</sup> centuries CE that the Lake Ohrid region prospered economically and creatively developing distinctive, religious art and architecture that reflected a fusion between Slavic and Byzantine cultures.

The development during this period of the settlement of Ohrid and its monasteries and churches on what is now the Macedonian side of the lake form the core of the already inscribed property.

By the beginning of the 15<sup>th</sup> century the whole lake area had come within the purview of the Ottoman Empire whose influence continued until 1912 and this is reflected in the later development of Ohrid and parts of the urban fabric of Pogradec in the proposed buffer zone.

In the 20<sup>th</sup> century the Lake Ohrid became part of the Kingdom of Yugoslavia. During World War II it was occupied by Bulgaria for a short period and then after the war became part of SFR Yugoslavia. Since 1991, the area is part of North Macedonia.

#### **Boundaries**

The proposed extension covers 94,728.6 ha, and the buffer zone 15,944.40 ha.

The proposed boundaries around the Lin peninsula are satisfactory. This uncoordinated development, particularly along the edges of the lake, explains why

almost none of the lake shore has been included in the nominated area.

The inclusion of the Drilon springs, as feeder springs to the lake and as an attractive landscape is justified but the exclusion of the inter-related Tushemisht springs is not fully justified. The village of Tushemisht is a traditional village built alongside the water channels. It is reasonably preserved although some buildings have been restored or rebuilt with inadequate materials. Its inclusion would benefit the extension if it could be the subject of careful conservation. The village would though be completely destroyed if the houses are 're-faced' as currently proposed (see below).

#### Buffer zone

In contrast to the already inscribed property in North Macedonia, where the property extends beyond the lake and lakeside settlements to encompass the landscape setting, in the proposed extension in Albania, the landscape is in the buffer zone.

The extensive buffer zone includes the flat farmed land, villages, the town of Pogradec and surrounding mountains. The large-scale agriculture and viticulture that prevailed until the 1990s, has been replaced with small scale farming by the local population. The vineyard terraces on the mountain sides have been largely abandoned and these areas are now used for cattle pasture and the provision of firewood and herbs.

The precise function of the buffer zone is currently unclear in terms of how it might support the setting of the enlarged property and particularly the lake, in terms of cultural parameters. Although the supportive value of the ecosystem of the buffer zone is set out, its supportive cultural value is not. As set out below the existing and potential development in the buffer zone is considerable.

#### State of conservation

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the overall state of conservation of the nominated extension and the large buffer zone gives cause for serious concern.

The last restoration of Lin Church was undertaken in (probably) the 1970's when the short upstand of the remaining walls were restored, with a layer of stones and mortar. At the same time, the site was protected with a roof but subsequently this was dismantled, although the upright supports still remain. The mosaics of the church have been recently covered with a 10-15 cm layer of sand for protection, apart from one in rather poor condition, which is open for viewing, and slightly protected with a plastic roof. The atrium, with its deep water cistern and corbelled tombs, is totally unprotected. Overall, there is an absence of active conservation and management and visitors are free to wander around the site.

For the traditional buildings of the Lin coastal settlement, there is currently no controlled conservation. New development on the outskirts has in part been halted since new legislation in 2015 as evidenced by three or four unfinished buildings, but the rebuilding of abandoned houses has continued with the addition of new floors. Although the maximum of two stories has been followed, much stronger controls are needed.

Since 2013, there have been trial excavations on the underwater sites and with carbon 14 dating undertaken. According to the underwater archaeology specialists of the Institute of Archaeology, there are daily controls to protect the sites against illegal excavations and illegal fishing in the area.

A lack of infrastructure and resources has precluded the conservation of perishable archaeological finds from these sites (wood, basketry in the lake-dwellings) and dendrochronology for the dating of sites. The museum in Pogradec can only be visited accompanied by the museum director because there are no showcases (the objects being shown on shelves without protection).

Except for the underwater sites, there is thus no active conservation strategy for the archaeological sites, buildings or landscape in the nominated area.

The archaeological sites appear to have been largely abandoned since exploration or excavations were undertaken in the 1960s-1970s. Villages in the buffer zone suffer from uncontrolled development and some inappropriate improvements. Overall, there appears to be no conservation approach for the cultural elements of the buffer zone landscape.

#### Factors affecting the property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the nominated terrestrial areas and the buffer zone are facing a wide range of threats.

These threats are clearly acknowledged in the nomination dossier. This states that: "*the relationship between urban buildings and the landscape, is vulnerable to the lack of adequate control of new development*". The Supplement to the Management Plan (see below) adds degradation of cultural heritage through uncontrolled development and loss of landscape character to the list of threats.

In general it is stated that '*Rapid development of the Lake Ohrid Region and the anticipated increase in tourism has the potential to erode the distinctive character of the area, and its rich local customs, crafts and traditions. There is a danger that the area will become a typical, generic coastal resort, and those local traditions, vernacular building styles and distinctive local products will be lost.*'

The Lin Peninsula is seen as one of the few remaining intact areas. But even here there is illegal development around the settlement as well as a lack of control for development of existing houses and their use. The gentrification of houses for holiday use has begun to have an impact, although the character of the settlement is still reasonably strong.

The main threat to the Lin Peninsula is the proposed railway from Kičevohe in North Macedonia. This is one of the two yet to be completed sections of the EU Pan-European Corridor VIII connecting the Black Sea with the Adriatic, through Bulgaria, North Macedonia and Albania. The initial proposal for this section was for it to pass alongside the lake within Albania before connecting into the existing railway structures to the west of the Lin peninsula.

In 2017 a Joint World Heritage Centre/ICOMOS/IUCN Reactive Monitoring Mission visited the inscribed property in the North Macedonia and recommended that the authorities submit to the World Heritage Centre, for review by the Advisory Bodies, a comprehensive comparative study of alternative routes including those that do not pass through the inscribed property or in close vicinity to the lakeshore in Albania. In response to a request by ICOMOS to the State Party of Albanian for more information on assessment of alternative routes that could avoid the Lin Peninsula, no details have been provided.

If the railway were to be constructed along the original line this would threaten the integrity of the Lin peninsula.

The landscape of the Drilon springs, is already used for fish farming and is now under threat from a major tourist development that encompasses both Drilon and Tushemisht. A call for tenders organised by Albanian-American Development fund was launched in May 2018 for the \$5 million project to develop leisure facilities around the Drilon springs, the nearby Tushemisht village and a strip of the lakeshore. The project includes leisure parks, the development of high quality accommodation, re-styling of the facades in Tushemisht village, a new museum, market and concert halls and car parks for cars and buses. The tender was awarded in September 2018. If implemented, the Drilon springs would no longer contribute any cultural value to the proposed property extension.

The buffer zone, as the *'exceptional setting'* is also seen as *'vulnerable to excessive lakeshore development, landscape fragmentation, inappropriate restoration, construction on open hillsides and high-rise buildings. On a finer scale, the quality of land and waterscape is diminished by inappropriate shoreline development, solid waste and air and water pollution. Coastal development is breaking the ecological linkages between the lake and its setting'*.

In the buffer zone, the uncoordinated and in some places illegal development in and around the existing settlements and along the lake shore in the form of tourist resorts and villas, together with major infrastructure projects such as arterial roads that run alongside the lake, has impacted highly adversely on the quality of the landscape and, crucially, on its relationship to the lake. This uncoordinated development, particularly along the edges of the lake, explains why almost none of the lake shore has been included in the nominated area. Work has started, though, to remove illegal buildings along the lake shore and to re-align part of the road away from the lake.

The village of Lin, together with the village of Tushemisht and the town of Pogradec, both in the buffer zone, have been included in a list of 100 villages which can apply for grants to support infrastructural and sustainable tourism development. The potential scale of such development is well illustrated by the current proposals for Drilon.

There is also evidence of illegal interventions to the water springs that feed into the lake which have had an impact on the water quality of the Drilon Springs, and more generally to the inadequate treatment of wastewater and solid waste, as well as water pollution from abandoned mining activities.

### 3 Proposed justification for inscription

#### Proposed justification

The existing inscribed World Heritage property has an Outstanding Universal Value for the following reasons:

- The town of Ohrid, built mostly between the 7<sup>th</sup> and 19<sup>th</sup> centuries, is one of the oldest human settlements in Europe;
- Ohrid's architecture represents the best preserved and most complete ensemble of ancient urban architecture of this part of Europe; it includes the oldest Slav monastery, remains of seven Christian basilicas with mosaic floors built during the 4<sup>th</sup>, 5<sup>th</sup> and early 6<sup>th</sup> centuries, and well-preserved late-Ottoman urban residential architecture dating from the 18<sup>th</sup> and 19<sup>th</sup> centuries;
- Fishing settlement of Struga;
- Great number of archaeological sites from Neolithic period, the Bronze Age, the Macedonian Hellenistic period, the Roman and the early Middle Age period;
- Landscape that reflects the convergence of well-conserved natural values with the quality and diversity of cultural, material and spiritual heritage.

The extension to the property is considered by the State Party to contribute to this Outstanding Universal Value for the following reasons:

- The form and prominent position of the Lin Peninsula projecting into the lake, is considered to provide a *'visual and astonishing experience that visitors can have of the lakescape when descending from Qafe Thanë towards the lake'*. The Lin Church is seen as

evidence that *'the advantages of that location were understood and already exploited since ancient times'*, while the settlement of Lin village, *'completes the visual picture of a settlement pattern that characterizes the entire lake area'* that *'represents a concentration of heritage resources and values that need to be cared of and specifically protected'*.

- The pile dwelling settlements along the coast of the Lake, and the traditional fishermen village of Lin are seen to reflect well preserved traditional architecture.

### **Comparative analysis**

The Comparative Analysis in the nomination dossier encompasses only natural aspects.

As this is a major extension rather than a new nomination, the purpose of the comparative analysis should have been to justify what has been included in the proposed extension in relation to attributes of Outstanding Universal Value of the inscribed property, and what else was considered to support the existing Outstanding Universal Value.

Such an analysis should have been the opportunity to consider in more detail comparisons between the Lin Church and other mid-6<sup>th</sup> century churches around the Macedonian side of the lake.

The State Party submitted some supplementary information that provides a better understanding of the context for the Lin church and particularly links between its mosaics and other contemporary ones in the existing property. No details have been provided on liturgical links between Lin and other contemporary churches, although the arch-episcopacy of Ohrid established by the Emperor Justinian, extended to all the episcopacies of today's Albania where there is a rich collection of early Christian archives.

Given the wealth of scholarship relating to early Christian churches in this area, it is disappointing that the nomination did not include a comprehensive summary of what is known of the church, its architectural form and mosaics, in relation to contemporary structures around Lake Ohrid.

There is a similar lack of detailed documentation for the pile dwelling sites in relation to those in the inscribed property.

In reaching a conclusion, ICOMOS has relied on wider evidence.

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ICOMOS considers that a comparative analysis has justified consideration of this extension to the inscribed property in cultural terms.

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### **Criteria under which inscription is proposed**

The extended property is nominated on the basis of cultural criteria (i), (iii) and (iv) (and natural criterion (vii)).

Criterion (i): *represent a masterpiece of human creative genius;*

The justification for criterion (i) for the existing property reflects the way Ohrid is seen as one of the best preserved and complete urban ensembles dating from 7<sup>th</sup> to 19<sup>th</sup> centuries in this part of Europe and one that possess outstanding historic, architectural, cultural and artistic values. The standing remains are complemented by archaeological evidence of earlier Christian basilicas and earlier periods back to the Neolithic.

The proposed extension to the property is seen by the State Party to augment this existing justification as the Lin Peninsula appears to have been inhabited since the late Neolithic period and bears witnesses to human activity throughout the Bronze and Iron Ages continuing also through the 4<sup>th</sup> – 3<sup>rd</sup> centuries B.C.E. during the First Illyrian Kingdom, while the remains of its early Christian church are considered to be very similar to the religious architecture of the same period in Ohrid.

ICOMOS considers that the Lin church is the relevant focus for criterion (i), with the archaeological sites and overall longevity of settlement of the Lin peninsula being supportive.

As already stated, a strong case has not been provided to justify why the Lin church might be considered to support the ensemble of churches in the existing property. Nonetheless, from available information, ICOMOS considers that the remains of the small church on a high point of the Lin Peninsula do have the potential to complement what is known from excavations of early Byzantine churches on the Macedonian side of the lake dating from the mid-6<sup>th</sup> century, and evidence for early settlement around the church complements its value.

Criterion (iii): *bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;*

The justification for criterion (iii) for the existing property relates to the way it is seen as a testimony to Byzantine religious architecture, frescoes and icons that reflect the significance of this region as a religious and cultural centre over several centuries.

The proposed extension to the property is seen by the State Party to augment this justification as it is considered that the layout of the early Christian church of Lin is very similar to Christian basilicas of the same period in the Macedonian side of Ohrid, that the paved mosaic floors depicting biblical scenes and religious symbols are evidence that the same ateliers of mosaic and painting masters operated during the Early Christian period on both sides of the lake.

As indicated above, ICOMOS considers that although similarities between the layout of the Lin church and others in the existing property have not been well substantiated, there is clearer evidence for the church mosaics to be related to those in basilicas on the other side of the Lake and for both to reflect a single cultural tradition.

Criterion (iv): *be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;*

The justification for criterion (iv) for the existing property relates to the way the exceptional 'sacred and profane' architecture of Ohrid reflects two periods of history: lofty Christian basilicas known from archaeological evidence relate to the 4<sup>th</sup> to 6<sup>th</sup> centuries, and sacred and urban Byzantine architecture dates from the 9<sup>th</sup> to 14<sup>th</sup> centuries.

The proposed extension to the property is seen by the State Party to augment this justification through the way the remains of lake-shore pile dwellings, together with the sepulchral and religious monuments and traditional villages have together created a unique landscape, which has an harmonious and functional relationship with the natural environment.

ICOMOS considers that this justification is not relevant for the way this criterion was justified for the existing property, as this specifically relates to the way types of buildings reflect specific periods of history.

The Lin church certainly supports an understanding of the important basilicas of the early Christian period but what is nominated in the extension cannot be seen to exemplify the sacred and urban Byzantine architecture between the 9<sup>th</sup> and 4<sup>th</sup> centuries.

Nevertheless, ICOMOS consider that the Lin church in its setting on the Lin peninsula makes a sufficient contribution to the justification for this criterion, and that the later development in Lin village and the open landscape around it provides a crucial context for the church.

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ICOMOS consider that the nominated extension can be seen to support the justification for cultural criteria in the existing property and thus its overall Outstanding Universal Value.

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### **Integrity and authenticity**

#### **Integrity**

The statement of integrity that has been provided only relates to the natural criterion.

ICOMOS considers that the boundaries of the small Lin peninsula are adequate to encompass the attributes needed to support the Outstanding Universal Value of an enlarged property.

These attributes are highly vulnerable in terms of the lack of adequate conservation of the church remains and the overall lack of development control of the village and its landscape setting, as acknowledged by the State Party in the nomination dossier: *'Main threats to the integrity of the property include uncoordinated urban development, increasing population, old infrastructure, inadequate treatment of wastewater and solid waste, illegal interventions to the water springs and tourism pressure. In addition, pollution from increased traffic influences the quality of the water, which leads to the depletion of natural resources. The overall coherence of the property, and particularly the relationship between urban buildings and the landscape, is vulnerable to the lack of adequate control of new development.'*

#### **Authenticity**

The statement of authenticity does not detail the attributes of Outstanding Universal Value nor how they might reflect their value.

It focuses mainly on the weaknesses in terms of the way uncontrolled incremental interventions in the Lin settlement and the use of new materials present a threat to the authenticity of the property. It also mentions the vulnerability of the buffer zone to major infrastructure projects and other developments, and acknowledges that there is a lack of exploration of the underwater heritage.

ICOMOS considers if the Lin church is to convey its value as part of an ensemble of extremely important early Christian churches around Lake Ohrid, and if that value is to be supported by Lin village and the landscape of the peninsula, then the severe weaknesses that have been identified by the State Party mean that the whole ensemble is under threat.

The buffer zone is meant to provide support to the nominated areas in protecting the cultural landscape context for the Lin peninsula and the Lake, and to complement the landscape that is within the existing property. The current lack of adequate protection and development control means that it will be difficult for the buffer zone to perform that role

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ICOMOS considers that the requirements of integrity and authenticity have been met but the attributes are highly vulnerable and can be seen to be under threat.

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### **Evaluation of the proposed justification for inscription of the extended property**

The Outstanding Universal Value of the existing property is firmly focused on the town of Ohrid as the best preserved and most complete urban ensemble in this part of Europe, with its 36 churches from the 7<sup>th</sup> to 19<sup>th</sup> centuries, extensive collection of frescoes and icons, and 18<sup>th</sup> and 19<sup>th</sup> century urban fabric all set within a landscape that includes archaeological evidence of prehistoric, Greek and Roman sites, and for several early Christian basilicas from the mid-6<sup>th</sup> century.

The issue is how the sites on the Albania side of the lake within the proposed extension could enhance or support this extensive evidence.

ICOMOS considers that a strong case has not been provided to justify why the Lin church might be considered to support the ensemble of churches in the existing property. Nonetheless, from available information, ICOMOS considers that the remains of the small church on a high point of the Lin Peninsula do have the potential to complement what is known from excavations of early Byzantine churches on the Macedonian side of the lake dating from the mid-6<sup>th</sup> century, and evidence for early settlement around the church complements its value.

#### **Attributes**

The Lin Church is the key attribute that has the capacity to elucidate links with early Christian churches in the inscribed property.

This is supported by Lin village and evidence for longevity of settlement of the Lin Peninsula and underwater pile dwelling sites.

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ICOMOS considers that the Lin church with Lin village and the Lin peninsula has the potential to support the attributes of Outstanding Universal Value for the inscribed property.

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## **4 Conservation measures and monitoring**

### **Conservation measures**

In the Lin Church, no active conservation measures are currently being undertaken.

In terms of Lin village, although the authorities acknowledge the vulnerabilities of the vernacular architecture from insensitive alterations, and from inappropriate development, no active measures are yet in place to address these issues.

There are similarly no active conservation measures in place for vernacular settlements or archaeological sites in the buffer zone. There is a need for a systematic assessment of the state of conservation of the archaeological sites already formally protected. This could then allow priorities to be developed.

Similarly, there are no active measures in place for the conservation of finds from the underwater archaeological sites.

### **Monitoring**

The details of monitoring in the nomination dossier relate only to natural features and issues.

There is a clear need for monitoring of cultural features on the Lin Peninsula but also in the buffer zone, which should provide the setting for the lake and the historical and social context for the nominated cultural sites.

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ICOMOS considers that a monitoring regime for the cultural assets needs to be developed for the proposed extension and the buffer zone.

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## **5 Protection and management**

### **Documentation**

In the nominated areas, some documentation exists for the Early Christian Lin Church, the built heritage has been inventoried for the village of Lin and the archaeological sites underwater in Lake Ohrid are currently being inventoried by the Archaeological Institute of the University of Tirana. In the buffer zone, an inventory exists for the town of Pogradec but no work has been undertaken to document archaeological sites in the remainder of the buffer zone.

### **Legal protection**

Currently the proposed extension and the buffer zone are both included in the Pogradec Terrestrial/Aquatic Protected Landscape that was designated in 1999 to protect terrestrial and aquatic eco-systems.

Since 2015, the Municipality of Pogradec, which includes the proposed extension and buffer zone, has been actively working on a Municipal Development Plan together with guidelines for the protection and conservation of built heritage. This Regional Plan has not yet been approved by the National Territorial Planning Agency but once it is in place it will provide regional legislation for cultural heritage, which will cover the village of Lin.

The draft Municipal Development Plan has already served as the rationale for some destruction of buildings along the shoreline, which did not conform to building procedures.

### **Management system**

Until recently, the Pogradec Terrestrial/Aquatic Protected Landscape has not been actively managed and as a result change and development have had a marked negative impact on its natural values which are now seen as being either strongly modified or under intense pressure.

In 2014, a Protected Landscape Management Plan was developed and its objectives are to strengthen management, increase habitat protection and conservation, develop touristic and recreational use, and encourage the development of sustainable agriculture and socio-economic activities. This includes a five year Action Plan (2014-2019) that aims to start remedial measures through strengthening management and cooperation and improving the legal framework.

The Plan proposes to exclude the urban areas and the areas where intensive agricultural practices take place around the towns of Pogradec and Buçimas from the zoning of the protected landscape.

To this Management Plan has been added a World Heritage Supplement (2017-2027) that sets out systems to strengthen the management of the extended property and its buffer zone. This supplement covers both cultural and natural heritage in terms of threats and necessary actions. It should be noted that an approved Management Plan for the inscribed property in North Macedonia is still awaited although one is currently under development.

A management committee is proposed for the extension that is a modified version of the Committee for the Protected Areas. This consists of representatives of the key government agencies covering both nature and culture, and includes a representative of a citizen's initiative. It is to be chaired by the Mayor of Pogradec. It appears that this committee is not yet operational and in its absence it is unclear how this supplement is being or will be implemented.

Currently there is little evidence on the ground of direct management. The Lin Church appears to have no active management or regular monitoring and it is unclear who or is ultimately responsible for its management (if it is the museum of Pogradec, then there is insufficient personnel). Although the site is enclosed with a mesh fence and closed barriers, there is no active presence of guards and apparently nothing to stop mosaics being looted if they become better known.

Planning guidelines have been prepared for the Pogradec municipality, which includes the village of Lin and all villages in the buffer zone but these are not yet operational as neither Lin nor the other villages, have yet been listed as protected villages.

As the extension is proposed as a mixed site, there is a need for coordination and cooperation at both national and regional levels between agencies working with nature and those working with culture. Currently such coordination is lacking as evidence by the evaluation missions which were separately organised for culture and nature. Clearly such coordination needs to be made effective before a management committee can hope to achieve integrated management.

There also seems to be apparent difficulties at a national level in promoting coordination between Albania and the North Macedonia in relation to the proposed enlarged property. So far no formal over-arching structure has been elaborated to allow collaboration on management matters for both cultural and natural aspects between the two countries for the proposed trans-national property, although it is reported that invited representatives from the administration of the existing property shall be invited to participate in meetings of the management committee as a non-voting contributor. A Joint Lake Ohrid Management Board was established '*since a long time ago*' with a Memorandum of Understanding between Governments of Macedonia and Albania, to deal with matters related specifically to the lake.

Although a '*Watershed committee*' exists for the management of natural heritage in the two countries, it has not been very active. Trans-national coordination clearly could be a great advantage in sharing research and knowledge on ecclesiastical buildings, vernacular settlements and pile dwellings in order that an holistic approach could be developed for their research and preservation.

A further weakness is the lack of human and financial resources in both the inscribed property and the proposed extension. Although there has been active capacity building over the past few years supported by an EU funded project, and this has led to the development of objectives for the conservation of built heritage and underwater archaeology, there are very limited professional resources to carry out even essential work. In Albania, the personnel of the museum consists of only one person; there are no resources for the conservation of waterlogged material from the pile dwelling sites; and no possibility to undertake dendrochronological analysis. Furthermore there appears to be no designated personnel for the management of Lin Church, Lin village or the Dilion springs.

#### Interpretation

Interpretation and presentation is currently minimal. Although there is a site panel at the Lin Church, it could be much better presented. A concept needs to be developed for the presentation of this site that sets out what is known of the fabric and how the church relates to other similar early sites in the region. The presentation of the underwater archaeological sites is inexistent, but this is understandable since the zones need to be protected before being rendered accessible to the public.

The local museum, which represents the cultural heritage of the Pogradec and Lake Ohrid region, is not sustainable in its present state. The objects on display are of overall importance and well restored but are exposed on shelves without showcases and are not protected in any way.

In the buffer zone, the archaeological sites of importance such as the castle of Pogradec are not interpreted or well presented, although they are considered to be essential visiting points for local tourism.

#### Community involvement

Although the mission sensed that part of the community appears to be supportive of the nomination, there appears to have been little active involvement of community groups in its development.

The nomination dossier acknowledges that there is '*low shared knowledge and understanding and recognition of the specificity of this Region*' and clearly greater involvement of local communities would help to address this. Community participation is envisaged in the Management Plan.

### **Evaluation of the effectiveness of the protection and management of the nominated property**

The currently legal protection relates mainly to natural assets and cultural monuments: settlements, and landscape do not benefit from protection. Although a Municipal Development Plan has been drafted together with guidelines for the protection and conservation of built heritage these have not yet been approved.

Currently there is no effective management in place for the proposed extension or the buffer zone. A structure has been set out in the Supplementary Management Plan but so far it appears not to have been implemented. At the same time there appears to be little coordination between Ministries and Departments dealing with nature and culture and limited resources to implement improved conservation, management and monitoring of cultural heritage. Furthermore no arrangements have yet been considered for a trans-national over-arching coordinating mechanism between Albania and North Macedonia, as requested in the *Operational Guidelines*.

The management issues connected with managing the proposed large mixed transnational property are considerable. Although the terrestrial area nominated for cultural criteria is small, the buffer zone that protects the setting of the lake is large and highly vulnerable, and there is a need to integrate approaches to nature and culture and coordinate approaches across international boundaries. Currently the mechanisms are not in place to begin to address any of these challenges.

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ICOMOS considers that the legal protection and management currently in place are inadequate to address the major challenges facing the proposed extension and its buffer zone. The idea of collaborative working between ministries and departments dealing with culture and nature appears hardly to have begun and discussions have yet to start with the State Party of North Macedonia to formulate an over-arching transboundary coordinating mechanism.

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## **6 Conclusion**

The major boundary modification has been submitted to allow part of Ohrid Lake and its hinterland in Albania to support the part of the lake in Macedonia, which is already inscribed on the World Heritage List along with the town of Ohrid, its early Christian and Ottoman building ensembles, and the surrounding landscape.

The remains of the small early Christian church high on the Lin Peninsula that projects into the west side of Lake Ohrid do, in ICOMOS's view, have the potential to augment understanding of remains of similarly dated early Christian Basilicas within the inscribed property in North Macedonia. And the Lin peninsula with its early archaeological remains and small village provide the essential landscape context for the church.

The slender nomination dossier has not done justice to the value of the church, and although supplementary information has augmented the material to some extent, the opportunity has not been taken to set out all that is known of the church, in terms of its plan, mosaics and liturgical connections on the basis of the extensive research undertaken by Macedonian and Albanian scholars and the rich archives in Albania.

What could and should have been highlighted is how the church at Lin and other the early Byzantine churches in Albania relate to each other and to the larger group of early churches around Lake Ohrid in terms of architectural form, decorative mosaics, and liturgical aspects.

In the existing property, the boundary encompasses the landscape setting of the lake. In the proposed extension all the landscape, apart from the Lin peninsula and one small area surrounding the Drilon springs is in the buffer zone. In order to ensure a degree of coherence of the lake landscape, it is essential that the buffer zone allows an understanding of the convergence between culture and nature that is a key part of the inscribed property, and provide appropriate support for the inscribed areas.

The nominated buffer zone is of a good size and encompasses the forested slopes of mountains and agricultural and horticultural plains that border the lake within which are archaeological sites and settlements that contribute to an understanding of various stages in the history of the area. But the buffer zone as a whole is highly vulnerable as a result of excessive development along the lake, a new road that passes near the lake and unregulated development around towns and some villages, including inappropriate high-rise buildings on open hillside, all of which are severing the links between the lake and its setting. And currently there are few constraints in place to contain development and no management structures to implement the supplementary management plan that covers the nominated area and the buffer zone.

There is also a worrying lack of legal protection and active conservation and management for the nominated areas of the Lin Peninsula and the Drilon springs. The Lin peninsula is under potential threat from a proposed railway from Kičevo in North Macedonia to Albania, while inclusion in the nominated area of the Drilon springs is not preventing them from being transformed by a major tourist development.

The Drilon springs and the nearby springs of Tushemisht (in the buffer zone) are of interest from a cultural perspective as being a focus for early tourism in the area and currently are two of the few places where the natural hinterland of the lake can be appreciated. The springs are inter-related and, in ICOMOS's view, should have both been included in the nominated area. However if the proposed major tourism project is implemented, these small enclaves will lose their cultural value and another part of the lakeshore will have been lost.

The fragile remains of the Lin church, Lin village and the Lin peninsula are under potential threat, while the landscape of the buffer zone is under actual threat as well as under further potential threats.

In view of these serious, specific and acknowledged threats which endanger the cultural attributes that are being nominated to contribute to the Outstanding Universal Value of the existing property, and the need for urgent measures to counter these, ICOMOS considers that the proposed extension should be approved and at the same time be inscribed on the List of World Heritage in Danger.

## 7 Recommendations

ICOMOS recommends that the World Heritage Committee adopts the following draft decision, noting that this will be harmonized as appropriate with the recommendations of IUCN regarding their evaluation of this mixed site nomination under the natural criteria and included in the working document WHC/19/43.COM/8B.

### Recommendations with respect to inscription

ICOMOS recommends that the extension of the Natural and Cultural Heritage of the Ohrid region, Albania to the World Heritage List be **approved** and be simultaneously inscribed on the List of World Heritage in Danger, in relation to the acknowledged threats facing the cultural attributes and setting in Albania.

ICOMOS also recommends that the State Party invites a mission to the property as soon as possible to agree on a Desired State of Conservation for the removal of the property from the List of World Heritage in Danger, based on the cultural attributes of Outstanding Universal Value and to be reached through corrective measures that can then be phased and costed.

### Recommended Statement of Outstanding Universal Value

#### Brief synthesis

Situated on the shores of Lake Ohrid, the town of Ohrid is one of the oldest human settlements in Europe. Built mostly between the 7<sup>th</sup> and 19<sup>th</sup> centuries, Ohrid is home to the oldest Slav monastery (dedicated to St. Pantelejmon) and more than 800 Byzantine-style icons of worldwide fame dating from the 11<sup>th</sup> century to the end of the 14<sup>th</sup> century. Ohrid's architecture represents the best preserved and most complete ensemble of ancient urban architecture of this part of Europe. Slav culture spread from Ohrid to other parts of Europe. Seven basilicas have thus far been discovered in archaeological excavations in the old part of Ohrid. These basilicas were built during the 4<sup>th</sup>, 5<sup>th</sup> and beginning of the 6<sup>th</sup> centuries and contain architectural and decorative characteristics that indisputably point to a strong ascent and glory of Lychnidos, the former name of the town. The structure of the city nucleus is also enriched by a large number of archaeological sites, with an emphasis on early Christian basilicas, which are also known for their mosaic floors.

Special emphasis regarding Ohrid's old urban architecture must be given to the town's masonry heritage. In particular, Ohrid's traditional local influence can be seen among its well-preserved late-Ottoman urban residential architecture dating from the 18<sup>th</sup> and 19<sup>th</sup> centuries. The limited space for construction activities has led to the formation of a very narrow network of streets.

On the Lin Peninsula, in the west of the Lake, the Early Christian Lin church, founded in the mid-6<sup>th</sup> century, is related to the basilicas of Ohrid town in terms of its architectural form and decorative floor mosaics, and possibly also through liturgical links.

Although the town of Struga is located along the northern shores of Lake Ohrid, town life is concentrated along the banks of the Crn Drim River, which flows out of the lake. The existence of Struga is connected with several fishermen settlements on wooden piles situated along the lake shore. A great number of archaeological sites testify to origins from the Neolithic period, the Bronze Age, the Macedonian Hellenistic period, the Roman and the early Middle Age period. Similar pre-historic pile dwelling sites have also been identified in the western margins of the Lake.

The convergence of well-conserved natural values with the quality and diversity of its cultural, material and spiritual heritage makes this region truly unique.

**Criterion (i):** The town of Ohrid is one of the oldest human settlements in Europe. As one of the best preserved complete ensembles encompassing archaeological remains from the Bronze Age up to the Middle Ages, Ohrid boasts exemplary religious architecture dating from the 7<sup>th</sup> to 19<sup>th</sup> centuries as well as an urban structure showcasing vernacular architecture from the 18<sup>th</sup> and 19<sup>th</sup> centuries. All of them possess real historic, architectural, cultural and artistic values. The concentration of the archaeological remains and urban structures within the old urban centre of Ohrid, in the Lin Peninsula, and along the coast of Lake Ohrid as well as the surrounding areas creates an exceptional harmonious ensemble, which is one of the key features that make this region truly unique.

**Criterion (iii):** The property is a testimony of Byzantine arts, displayed by more than 2,500 square metres of frescoes and more than 800 icons of worldwide fame. The churches of St. Sophia (11<sup>th</sup> century), Holy Mother of God Perivleptos and St. John Kaneo notably display a high level of artistic achievements in their frescoes and theological representations, executed by local as well as foreign artists. Ancient architects erected immense basilicas, which were to serve as models for other basilicas for centuries. The development of ecclesiastical life along the shores of the lake, along with its own religious architecture, frescoes and icons, testifies to the significance of this region as a religious and cultural centre over the centuries. The similarities between the mosaics of Lin church in the west of the Lake with those

of the early basilicas of Ohrid to the east, reflect a single cultural tradition.

**Criterion (iv):** The Lake Ohrid region boasts the most ancient Slavonic monastery and the first Slavonic University in the Balkans – the Ohrid literary school that spread writing, education and culture throughout the old Slavonic world. The old town centre of Ohrid is a uniquely preserved, authentic ancient urban entity, adjusted to its coastal lake position and terrain, which is characterised by exceptional sacred and profane architecture. The architectural remains comprising a forum, public buildings, housing and sacred buildings with their infrastructure date back to the ancient town of Lychnidos (the former name of the town). The presence of early Christian architecture from 4<sup>th</sup> to 6<sup>th</sup> centuries is attested by the lofty basilicas of Ohrid and the small church of Lin. The Byzantine architecture of Ohrid with a great number of preserved sacred buildings of different types from 9<sup>th</sup> to 14<sup>th</sup> centuries, is of paramount importance and contributes to the unity of its urban architecture.

#### Integrity

Main threats to the integrity of the property include uncoordinated urban development, increasing population, inadequate treatment of wastewater and solid waste, and tourism pressure. In addition, pollution from increased traffic influences the quality of the water, which leads to the depletion of natural resources.

The integrity of the town of Ohrid suffered to some extent, as several houses built at the end of 19<sup>th</sup> century were demolished in order to exhibit the excavated remains of the Roman Theatre. The overall coherence of the property, and particularly the relationship between urban buildings and the landscape setting of the Lake, is vulnerable to the lack of adequate protection and control of new development.

#### Authenticity

The town of Ohrid is reasonably well preserved, although uncontrolled incremental interventions have impacted the overall form of the monumental urban ensemble as well as the lakeshore and wider landscape. These are also vulnerable to major infrastructure projects and other developments.

Concerning the religious buildings around Ohrid, important conservation and restoration works have been carried out since the 1990s. Conservation works on the monuments in the region have been thoroughly researched and documented, but some have impacted the property's authenticity. The icons and frescoes are in good condition and kept in the churches. The originally residential function of some buildings has changed over time, as have some of the interior outfitting of residential buildings, which were altered to improve living conditions. While reconstructions often used materials identical to those used at the time of construction, new materials have also been used on occasion, which presents a threat for the authenticity of the property.

The Lin church and its context is vulnerable to lack of protection and, inadequately controlled conservation and development. At the western side of the Lake, the support the buffer zone offers to the Lin peninsula and the landscape setting of the Lake is likely to be ineffective as a result of a lack of adequate protection and development control.

#### Protection and management requirements

In North Macedonia, the Natural and Cultural Heritage of the Ohrid region has several layers of legal protection. The protection of cultural heritage is regulated by the Law on Cultural Heritage Protection (*Official Gazette* of RM No. 20/04, 115/07), by-laws and a law declaring the old city core of Ohrid as a cultural heritage of particular importance (*Official Gazette* of RM No. 47/11). The protection of natural heritage is regulated by the Law on Nature Protection (*Official Gazette* of RM No. 67/2004, 14/2006 and 84/2007), including within and outside of protected areas. There is also the Law on Managing the World Cultural and Natural Heritage of the Ohrid Region (*Official Gazette* of RM No. 75/10). In Albania, the Pogradec Terrestrial/Aquatic Protected Landscape was designated in 1999 to protect both terrestrial and aquatic eco-systems; there is currently no specific national protection for cultural sites. Legal instruments need to be kept updated and implemented to protect the property.

In North Macedonia, the property is managed and protected through a range of relevant management documents, and an effective overall management plan is a clear long-term requirement. The "Physical Plan of the Republic of Macedonia" of 2004 provides the most successful long-term and integrated document for land management, providing a vision for the purpose, protection, organization and landscape of the country and how to manage it. This plan needs to be maintained and updated regularly, although some deficiencies have been noted in the general implementation of urban planning regulations and plans.

The property is managed by two ministries (the Ministry of Culture and the Ministry of Environment), via three municipalities (Ohrid, Struga and Debrca), although the municipalities legally do not have the authority to protect cultural and natural heritage. The Institute for Protection of Monuments of Culture and Museums in Ohrid has the authority to protect cultural heritage, and the Natural History Museum Dr Nikola Nezlobinski in Struga is responsible for protecting movable heritage. The Galichica National Park is authorized to manage natural heritage within the park as a whole, and part of the cultural heritage located within the territory of the Park. The Institute for Hydrobiology in Ohrid is responsible for the continuous monitoring of the Lake Ohrid ecosystem, the research and care for Lake Ohrid's flora and fauna, as well as the management of the fish hatchery, also to enrich the Lake's fish stocks.

Integrated management of natural and cultural heritage through a joint coordinating body and joint management

planning are urgently needed to ensure that the values of the property are conserved. Given the vulnerabilities of the property related to the development and impacts of tourism, the management requirements for the property need strengthening and new cooperation mechanisms and management practices must be put into place. This may include re-evaluating the existing protected areas, and ensuring adequate financial and human resources for management as well as effective management planning and proper law enforcement.

In Albania, in 2014, a Protected Landscape Management Plan was developed and its objectives are to strengthen management, increase habitat protection and conservation, develop touristic and recreational use, and encourage the development of sustainable agriculture and socio-economic activities. This includes a five year Action Plan (2014-2019) that aims to start remedial measures through strengthening management and cooperation and improving the legal framework. The Plan proposes to exclude the urban areas and the areas where intensive agricultural practices take place around the towns of Pogradec and Buçimas from the zoning of the protected landscape. To this Management Plan has been added a World Heritage Supplement (2017-2027) that sets out systems to strengthen the management of the extended property and its buffer zone. This supplement covers both cultural and natural heritage in terms of threats and necessary actions. A management committee is proposed that is a modified version of the Committee for the Protected Areas. This will consist of representatives of the key government agencies covering both nature and culture, and a representative of a citizen's initiative. It will be chaired by the Mayor of Pogradec.

Currently no formal over-arching structure has been elaborated to allow collaboration on management matters for both cultural and natural aspects between the two States Parties for the proposed trans-national property. A Joint Lake Ohrid Management Board exists, to deal with matters related specifically to the lake. The complexity of Lake Ohrid's shared natural and cultural heritage requires innovative governance models able to deal with a multitude of management objectives in the broader transboundary Lake Ohrid region. Cooperation between the cultural and natural sectors is essential, and the capacities of site management must be strengthened in order to effectively protect both the cultural and natural values of the property. Effective integration and implementation of planning processes at various levels, cross-sectorial cooperation, community participation and transboundary conservation are all preconditions for the successful long-term management of Lake Ohrid.

#### **Additional recommendations**

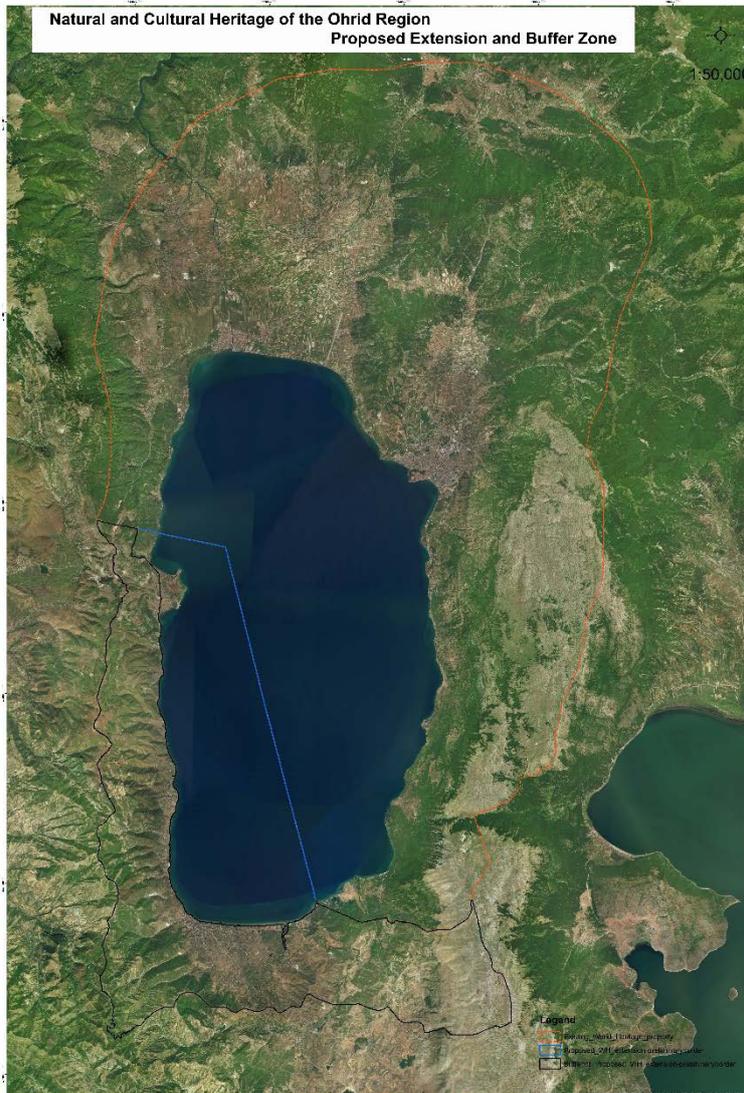
ICOMOS further recommends that the State Party give urgent consideration to the following:

- a) Inviting an ICOMOS mission to the property to discuss the identification of Corrective Measures that will need to address the following:

- o Introduce a formal structure to allow collaboration between the two participating States Parties for the trans-boundary property,
- o Strengthen legal protection,
- o Approve and operationalise the Municipal Development Plan,
- o Operationalise planning guidelines,
- o Introduce an effective management system,
- o Increase human and financial resources to support them management of the property,
- o Strengthen collaborative working between cultural and natural agencies and departments at both national and regional levels,
- o Fully implement the Management Plan,
- o Increase community participation,
- o Introduce a monitoring regime for cultural assets,
- o Strengthen protection at Lin church as a matter of urgency,
- o Appoint designated personnel for the management of Lin church, Lin village and Lin peninsula,
- o Improve collection facilities at Pogradec museum and the conservation of waterlogged material from the pile dwelling sites,
- o Continue to remove illegal buildings along the lake shore and re-align part of the road away from the lake,
- o Prepare an inventory of the cultural sites in the buffer zone and introduce a conservation approach for these and the buffer zone landscape,

- b) Providing a comprehensive comparative study of alternative routes for the proposed railway from Kičevohe in North Macedonia to Albania including those that do not pass through the inscribed property or in close vicinity to the lakeshore in Albania,

- c) Submitting to the World Heritage Centre by 1<sup>st</sup> December 2019 a report on the implementation of the recommendations set out above for examination by the World Heritage Committee at its 44<sup>th</sup> session in 2020;



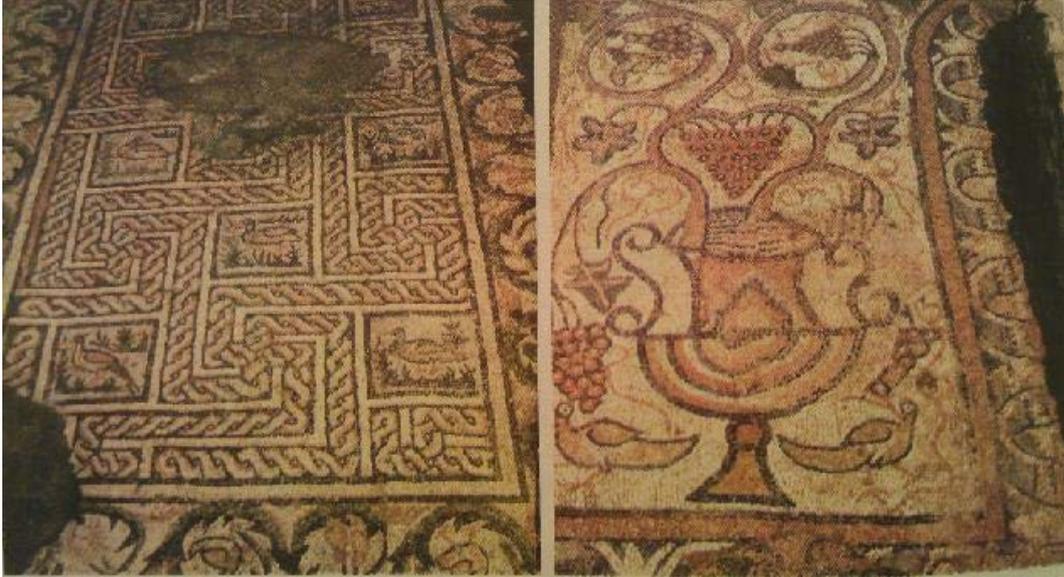
Map showing the boundaries of the proposed extension of the property



Ohrid Lake landscape



Panoramic view of the Lin village



Partial view of the Lin Church's mosaic floors



Underwater pile dwelling site on the shores of the lake