STATE OF CONSERVATION REPORT

OF THE ANCIENT CITY OF NESSEBAR

BULGARIA, (C 217)

2019–2020

Inscribed on the World Heritage list under criteria iii and iv at the 7th ordinary session of the World Heritage Committee in 1983
I. Executive Summary of the report:

The presented report on the Ancient City of Nessebar covers the period 2019-2020 and reflects the actions taken by Bulgaria to implement Decision 43 COM 7B.81 of the World Heritage Committee, as well as the progress in implementing the recommendations of the reactive monitoring mission from 2018 and previous missions.

The regimes for the conservation of the property, which take into account its Outstanding Universal Value (OUV), are applied: the Inspectorate for the Protection of Cultural Heritage carries out regular inspections; the Regional Directorate for National Construction Control monitors the implementation of the orders for elimination of illegal constructions; the National Institute for Immovable Cultural Heritage (NIICH) and the Ministry of Culture rule on compliance with the conservation regimes of requests for interventions, thus preventing possible threats of an anthropogenic nature and preventing modification of the development characteristics. There are no infrastructure projects that threaten the OUV.

NIICH conducted monitoring (2018-2020) of all monuments on the territory of Ancient of Nessebar and the urban environment, conservation measures have been defined. Documentation of street silhouettes and medieval churches has been completed. A report has been prepared with analysis and evaluation of the project of the CPM from 2011 ("Scientific and experimental development" - "Conservation and Management plan of the town of Nessebar - old town "), with a recommendation that the project for CMP be shorter in content and in interaction with current plans and strategic documents.

Nessebar Municipality has developed strategic documents related to the protection of OUV on the site: Integrated Development Plan of Nessebar Municipality 2021-2027; Municipal Development Plan 2014-2020: Sustainable Tourism Development Programme 2018-2024; Action Plan for the Implementation of the Programme; General Development Plan. Under various programs, as well as from the municipal budget, projects and activities for conservation and restoration of elements of the OUV are financed. In connection with the amendment of the Regional Development Act of March 2020, a new strategic document has been prepared: Integrated Development Plan of Nessebar Municipality 2021-2027. The “General Plan for Organization of the Traffic in the Ancient City of Nessebar” is scheduled to enter into force in the spring of 2021.

Municipal structure “Ancient City of Nessebar - World Heritage” and municipal fund “Culture” have been created, which accumulate funds for heritage conservation activities. Measures have been adopted to improve the urban environment, the spaces around the churches; rules have been created for the commercial areas, as well as to restrict the traffic within the world cultural property; traditional customs and crafts are reflected in events; the site is promoted through international projects and various websites.

A long-term program of the CUA is implemented aimed at revealing the potential of underwater heritage as an important attribute of OUV; a study of medieval and post-medieval graffiti, mainly of ships, was conducted in Nessebar churches.

In 2018 and 2019, supplements to the Cultural Heritage Act related to the financing of conservation and management plans, coordination between them, integrated development plans for municipalities and spatial development plans for the territorial scope of immovable cultural
properties, and the powers of the CUA in relation to the assessment of archaeological remains discovered underwater have been expanded.

II. Response to the Decision 43 COM 7B.81 of the World Heritage Committee:

Ancient City of Nessebar (Bulgaria) (C 217)

The World Heritage Committee,

1. Having examined Document WHC/19/43.COM/7B,

2. Recalling Decision 41 COM 7B.43, adopted at its 41st session (Krakow, 2017),

3. Takes note of progress of the State Party in implementing previous Committee decisions and mission recommendations, but notes with concern that steps undertaken are insufficient and that some urgent matters are yet to be addressed:

In recent years the Bulgarian side has taken a number of measures for the conservation and protection of the world cultural property. Conservation regimes are in force for the Ancient City of Nessebar, which take into account the Outstanding World Value (OUV) of the cultural property, its location and the marine landscape, and are mandatory for implementation. The Inspectorate for the Protection of Cultural Heritage established by the Ministry of Culture conducts effective control of the territory of the World Cultural Property and illegal construction is stopped. The Regional Directorate for National Construction Control (RDNCC) and the Municipality of Nessebar monitor the implementation of the orders for the removal of such constructions established in previous years. The RDNCC shall update this information annually in its reports. The National Institute for Immovable Cultural Heritage (NIICH) and the Ministry of Culture rule on the eligibility of spatial and investment projects for the territory of the property and its buffer zone on the basis of their compliance with the conservation regimes of Ancient Nessebar. Interventions leading to alteration of the structural characteristics of the urban fabric and the environment are not allowed. Compliance with the prescriptions for conservation for the respective areas of the cultural property prevents possible threats of an anthropogenic nature. NIICH monitors the state of the property and determines measures for the protection of the sites and the environment.

There is constant interaction between all institutions and stakeholders, part of the process of conservation of the Ancient City of Nessebar. At the local level, the municipality of Nessebar has created strategic and normative documents with regard to the protection of the OUV of the site. Strategic documents: (Integrated Development Plan of Nessebar Municipality 2021-2027; Municipal Development Plan 2014-2020; Sustainable Tourism Development Programme for the period 2018-2024; Action Plan for the implementation of the Programme; General Development Plan of Nessebar Municipality). Municipal structure “Ancient City of Nessebar - World Heritage” (activities for preservation of cultural heritage and planning and organization of the cultural calendar of the municipality of Nessebar) and municipal fund “Culture” (accumulates funds for activities for preservation of cultural heritage) have been established. Activities for conservation and restoration of medieval churches, fortress walls and other immovable cultural properties - elements of the OUV - are financed under various programmes. Measures have been adopted to improve the urban environment, streets, square spaces and spaces around the churches are being developed. The municipality works to increase the
attractiveness of the tangible and intangible resources of the cultural property by: organizing events outside the summer season that contribute to a year-round visit to Nessebar; conducting international and national festivals, seminars, exhibitions, lectures, educational programs for students related to the history and cultural heritage of Nessebar; reflecting in events the traditional customs and crafts presenting both Nessebar and Black Sea culture in general; promoting the site through participation in international projects, international exhibitions for cultural tourism, editions and various websites.

In carrying out the activities of conservation of the Ancient City of Nessebar, a number of normative acts are applied. In March 2020, an amendment to the Regional Development Act regulated the development of a new strategic document - Integrated Development Plan of the Municipality, as part of the System of Documents for Strategic Planning of Regional and Spatial Development. In 2018 and 2019, amendments and supplements to the Cultural Heritage Act were adopted, supplementing the funding order for conservation and management plans, ensuring coordination between conservation and management plans, integrated development plans for municipalities and spatial plans for the territorial scope of single or group immovable cultural properties, as well as extending the powers of the Centre for Underwater Archaeology in relation to the assessment of archaeological remains discovered underwater, which is relevant for the aquatory of the Ancient City of Nessebar. The state provides conditions for conducting underwater surveys in Ancient Nessebar in accordance with the recommendations of the advisory missions. A long-term program of the Centre for Underwater Archaeology is being implemented to explore, document and socialize the underwater and sea-related cultural heritage of Nessebar, aimed at revealing the potential of the underwater heritage as an important attribute of the OUV. In connection with the changes in the conservation status and the current strategic documents, a report has been prepared with analysis and evaluation of the previous CMP project in terms of the management of the ICP. The CMP project is being revised on the basis of the analyses and evaluations made and in relation to the vision and strategic objectives for development of the Ancient City of Nessebar, reflected in the current strategic documents of Nessebar Municipality.

4. Notes with great concern that the 2018 Reactive Monitoring mission found that the attributes of Outstanding Universal Value (OUV) of the property are deteriorated;

The 2017 Advisory mission, one year before the Reactive Monitoring in 2018, found that the main attributes of the Outstanding Universal Value of the site are preserved: "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". (p.5 and p.10). During the next period no projects were allowed and no interventions were carried out on the territory of Ancient Nessebar, which could lead to negative changes in the attributes of the Outstanding Universal Value (OUV) of the property.

- The inscription of the Ancient City of Nessebar on the World Heritage List in criterion iii noted that “seven churches from the Middle Ages have been preserved” - “the most valuable and tangible part of Nessebar’s heritage”. In accordance with the international recommendations for adaptive reuse of historic buildings, four of the medieval churches have been restored and socialized, and for two more of them a project for conservation and restoration has been prepare and presented to the Fund FLAG and DZZD “Fund for
Sustainable Cities” to provide financing in the form of a financial instrument and/or grants under OP “Regions in Growth 2014-2020”.

The medieval churches are located in the traditional outlines of the square spaces preserved over time and their overall condition is good. NIICH has performed geodetic and photogrammetric imaging of all medieval churches. The municipality of Nessebar takes serious care of the sites of religious architecture. The public spaces around the churches are well-developed and four of them are connected in a cultural route under the project “Faith in Nessebar” (stage of “Spiritual Road”) with an appropriately marked in the stone pavement walking line. It is envisaged to continue the implementation of the route “Spiritual Road”, as well as the creation of a route “Temples of Nessebar”.

Commercial activities that obstruct the visibility of the monuments are not allowed. An ordinance of the municipality prohibits the placing of facilities around cultural monuments and in front of commercial sites, on the walls and fences of houses in the Ancient city. There are no commercial facilities and tables for outdoor serving in the immediate vicinity of the churches. In 2019, technical means have been installed for year-round restriction of motor vehicle traffic around some of the medieval churches, which also contributes to better visual perception of cultural properties.

The adopted in March 2019 Ordinance on the terms and conditions for placement and removal of movable objects, advertising information and monumental-decorative elements on the territory of the municipality of Nessebar requires schemes for placement of advertising information elements on real estate - immovable cultural values, as well as for placement of movable objects within their boundaries and buffer zones, before their submission for approval, shall be coordinated under the conditions and in accordance with the order of the Cultural Heritage Act.

- In Criterion (iii) it is stated that Nessebar “Having been a remarkable spiritual centre of Christianity for a thousand years, today it is a developing and vibrant urban organism”. This role of Nessebar was most significant in the Middle Ages. Medieval churches are now used for cultural purposes. Some of them are museum sites that are run and managed by the Ancient Nessebar Museum and are used for cultural activities such as the presentation of icons from previously extinct Nessebar churches, the presentation of archaeological properties, including religious ones, exhibitions organized by the museum, concerts, presentation of books, etc.

- Archaeological structures and tangible traces of numerous civilizations can also be traced through the large number of uncovered, researched, documented, photographed and exhibited archaeological sites from different eras. Studies, both on land and in the aquatory, continue. Archaeological studies carried out from 1983 to the present day have enriched the information and presentation of the cultural heritage with more discovered archaeological properties. No new projects are being developed on archaeological properties. The prescriptions for conservation of 2015 require investment design, construction and public works to be carried out after rescue archaeological research. The protection of archaeological properties requires ensuring the exposure, integration and socialization of archaeological structures, as archaeological sites and their context are taken into account in their functional, meaningful and spatial integrity. In the event that the results of the study and evaluation of the scientific, cultural and exposure value of the disclosed immovable archaeological structures
impose structural changes, they shall proceed in accordance with the Law on Spatial Planning and the Law on Cultural Heritage.

- *With regard to the transformation of the coastline, coastal fortifications, coastal streets and port functions:* It should be noted that already in the period 1977-1981 (two years before the inscription of Ancient Nessebar on the World Heritage List) projects were prepared and implementation of strengthening and reconstruction of the east and north shores was started; in 1983 - emergency strengthening of the east coast and in 1984 - of the south-east coast. Emergency reinforcement of new landslides along the coastline was conducted in 1987. Overall shoreline reinforcement of the western part of the south coast was designed and implemented also in the early 1980s. Then the coastal fortification wall with an alley was built. "The need for emergency reinforcement of the coasts of the peninsula, which necessitated a breach of the authenticity of the original" was already established in the Directive Plan Concept prepared in 1985 by the National Institute for Cultural Monuments. The existing, not currently accepted draft Conservation and Management Plan states: "The created environment with a panoramic promenade that surrounds the entire peninsula enriches the natural framework and creates an opportunity for a new view and perception of the property as part of the overall natural and urbanized landscape of the coastline". According to the prescriptions for the protection of Ancient Nessebar for the Zone of Recovered Areas and slopes, which entered into force in 2015, it is required: exposing, integrating and socializing the archaeological structures: projects for fortification activities of the slopes should take into account the morphology of the terrain and the results of the archaeological studies; based on existing data and the results of the archaeological studies, the constructed fortification facilities for the slopes should be functionally, structurally and architecturally integrated in the context of the ancient city; in the park development of the slopes should be used a simplified composition in green colour range to serve as a background for the expression of the property. Removal of temporary construction for commercial activities to the right of the isthmus to the southern port is forthcoming, given the compromised aesthetic and cultural value of structures with imitative architecture, for which there is approved project documentation for Public Works of Park Space and Bazaar of Movable Objects" in SLP I, q. 106.

Throughout the history of the development of Nessebar the port function is essential for the sea settlement. A number of facts and studies results show the significance of Messambria/Messemmvria/ Nessebar as a port settlement mentioned in many sources. The port with the Sea Station (built in the 1960s) bears this traditional function, acted actively and was an integral part of the urban fabric and landscape, both before and at the time of inscription of the Ancient City of Nessebar on the World Heritage List in 1983, but for years it has not been moored by large ships and there is no intense shipping. Since the construction of the sea station, no new buildings have been realized. The report of the 2017 Joint Advisory Mission of ICOMOS and the Scientific and Technical Advisory Body (STAB) to the UNESCO Convention on the Conservation of Underwater Cultural Heritage made the following finding: "...there are currently no proposals for the Nessebar Port Terminal of concern". There are currently no stated investment intentions for the port terminal. In case of possible future ones, in accordance with the requirements of Art. 172 of the Operational Guidelines, the World Heritage Committee through the Secretariat will be informed in order to assess the admissibility of interventions with regard to the conservation of the World Heritage Site. To ensure constant control and prevention of investment actions endangering the World Heritage Site buffer zone, the
Commission for Control on the Implementation of the Concession Award Contract of the Ministry of Transport, Information Technology and Communications (MITTC) includes a representative of the National Institute of Immovable Cultural Heritage (NIICH). For any intention of the concessionaire to intervene in the territory, the order defined in the Cultural Heritage Act shall be observed. In 2019, by letter with outgoing No. 0400-361/30.05.2019 (Annex 1) of NIICH was refused a proposal of the concessionaire to place movable objects and facilities on the territory of the port terminal. In connection with the received in NIICH options for a conceptual solution of a draft General Plan of the Port Terminal Nessebar, NIICH accepts as permissible the option in which no new construction is envisaged and sets a number of requirements for supplementing the documentation.

For the project for the rehabilitation and modernization of the Fishing Port “Severna buna”, the report of the Joint Advisory Mission of ICOMOS and the Scientific and Technical Advisory Body (STAB) to the Convention for the Conservation of the Underwater Cultural Heritage (26.11-3.12.2017) made the following finding: “The revised project to modernise the fishing port “Severna buna” no longer poses a risk to the OUV”. After familiarization with the project and the Impact Assessment of the project carried out, the conclusion of ICOMOS, based on analysis, is: “ICOMOS considers that the latest dike project is better than the one presented and approved by ICOMOS in its technical reviews of December 2016 and March 2017 and considers that this project will not have significant negative effects on the outstanding universal value of the Ancient City of Nessebar” (from ICOMOS Technical Report sent by the World Heritage Centre on 23.07.2018). To comply with all specified requirements, the Ministry of Culture and the Centre for Underwater Archaeology (CUA) conduct control of the implementation of the project and take action to remedy possible violations. In 2019, CUA found that for the construction of the new protective breakwater, commissioning of construction and assembly works - part “Hydro technical construction” (HTC) is carried out, without coordinated documentation under the Law on Cultural Heritage. By an act of the General Directorate “Inspectorate for the Protection of Cultural Heritage” of the Ministry of Culture on 01.11.2019 a Prior administrative measure was imposed on the municipality of Nessebar and the public procurement for their award was suspended. As a result, a new design documentation has been prepared under part HTS (Annex 2), in which the safety breakwater is not a stationary protective equipment, but consists of floating pontoons anchored with reinforced concrete anchors and steel chains. With the opinions of the National Institute of Immovable Cultural Heritage and the Centre for Underwater Archaeology, preliminary underwater archaeological studies are required at the anchoring sites. A requirement for archaeological surveillance is also set by the Ministry of Environment and Water (Regional Inspectorate of Environment Protection). The hydrotechnical anchoring activities themselves will be accompanied by monitoring by the Centre for Underwater Archaeology.

- **On urban structure:** Almost complete continuity can be established in the character of the street structure of the peninsula, which preserved the main ancient and medieval directions and repeated that of the 19th century. Such continuity also exists in terms of the location of neighbourhoods. Preserved in its outlines are also the square spaces in which the medieval churches are located. Many of the buildings of the 20th century are built on the outline of old building spots. The construction of illegal superstructures and extensions of existing buildings took place mostly in the period before the appearance of more hotels in the New Town and numerous hotels in the nearby resort complex “Sunny Beach”. In the autumn of 2010, the
removal of illegal interventions, also recognized by the Directorate for National Construction Control as illegal construction works, which for the most part are superstructures of modern buildings with an illegal floor or counterfort. Although the procedure is difficult and slow, illegal interventions are gradually being eliminated on residential buildings and commercial premises, including around churches. Residential buildings on the outer line of the upper platform of the peninsula are from before 2009, with the exception of the house on the slope on the north coast (SLP II-695, q. 18a), on which procedural and investigative actions are ongoing, but which also has an approved project from before 2009. These areas were less built during the Bulgarian Revival period and the next construction naturally developed in them. The 2018 mission report suggests that multi-storey buildings are being erected along the peninsula coast. There are no multi-storey buildings in Ancient city. The majority of buildings on the peninsula are on two floors with an attic floor. There are some four-storey buildings that are either on sloping terrain or illegally upgraded. Buildings on 5 and 6 floors are located on the continent opposite the peninsula at the periphery of the buffer zone of the property or outside it and inside the coastline. These buildings were built before the entry into force in 2015 of the conservation regimes of the “Ancient City of Nessebar”, which allow construction of 2 to 4 floors following the slope of the natural terrain. After the adoption of the conservation regimes of the property, no new construction has been implemented in the buffer zone.

- During the monitoring 2018-2020 conducted by the National Institute for Immovable Cultural Heritage of all immovable cultural properties on the territory of Ancient Nessebar and the state of the urban environment, the current state of affairs was investigated, the problems and urgency of the risk were identified, a comparative analysis and assessment was carried out on certain indicators, classification of the authenticity of the sites and the state of conservation of the urban environment was introduced, interventions that violate the OUV of the property were identified and guidelines for their elimination were defined. On this basis, long-term, medium-term, short-term and urgent measures for the conservation of sites and their environment are identified, which will be specified in the programmes implementing the conservation and management plan. The results of the monitoring show that medieval churches and buildings of vernacular architecture are highly preserved, with partial changes in the appearance of some houses of vernacular architecture being reversible.

Regarding the “conversion of buildings from residential to commercial or tourist areas”, we would like to clarify that the ground floors of buildings are being converted and not for entire buildings, and that Nessebar has always been a commercial city, both in the distant past and now. Trade has developed in the spaces and streets leading to the port. In this respect, the commercial use of the ground floors of a large number of houses located along the main street routes should not be considered to be a negative phenomenon. Conversions into ground-floor stores of residential buildings located on the street regulation, is also a way of avoiding outdoor trade in the urbanized territory of the peninsula. The previous draft Plan for Conservation and Management (PCM) (which is also considered by ICOMOS), in item 5.1. “Strategic Guidelines”, (3) “Trade and Public Service”, proposes: “opening of the yards to commercial activities and services: preservation of commercial activities in the ground floors of the buildings in accordance with the current normative documents ..., as well as in the spirit of notes and recommendations from the Public Discussion of the PCM”. In implementation of this recommendation, commercial activity initiatives have been implemented in the yards of the houses in recent years, and commercial facilities do not violate the integrity of the environment
- they are located behind the fences and gates without exceeding them, as noted in the 2018 report. We believe that like any seaside resort settlement with a small number of permanent residents, it is inevitable that Ancient Nessebar is much more lively in the summer than in the winter season, and the reason for this is not the shops on the ground floors or the catering establishments.

In the opinion of the Municipality of Nessebar the summer sea holiday tourism has no negative impact on the conservation and condition of the Ancient City of Nessebar. About 1 million tourists rest annually in the nearby Sunny Beach resort. Only a few small family hotels and guest houses operate on the territory of Ancient Nessebar, which generally do not influence and determine the tourist supply and demand. According to the data of tour operators and hotel-keepers, supplemented by the statistics of the Tourist Information Centre and Museum “Ancient Nessebar”, of this total number of tourists, approximately one in three visits the peninsula. i.e. no more than 340,000 tourists pass through the territory of Ancient Nessebar annually, and 145,000 of them visit museum sites. Of course, this does not apply to 2020, when there are many fewer visitors to the peninsula.

- Nessebar Municipality applied under OP “Regions in Growth” with sites-representatives of the attributes of the Outstanding Universal Value from the criteria by which Ancient Nessebar is inscribed in the List of World Heritage - Archaeological Heritage (Archaeological Structures from the 2nd century BC and preserved remains of the Black Sea Greek colony - fortress walls; Early Byzantine thermae; Water supply system - tanker and underground galleries, etc.); Medieval churches; Representatives of vernacular architecture and other monuments (two windmills and a fountain).

- 5. Also notes with great concern that actions taken to date are not sufficient to reverse the current negative trend and to remove the substantial threats to the OUV of the property;

In 2018, the National Institute for Immovable Cultural Heritage monitored the condition of all immovable cultural properties on the territory of Ancient Nessebar, identified the factors causing the damages, determined the nature of the measures and the urgency of the risk. Monitoring of the state of the urban environment was carried out in October 2020. Comparative analysis and evaluation was carried out on indicators taking into account the criteria according to which the Ancient City of Nessebar was inscribed in the World Heritage List, classification of the authenticity of the sites and the state of conservation of the urban environment was introduced. Interventions that violate the OUV of the property and guidelines for their elimination have been identified. In 2020 NIICH has completed the digital and graphical preparation of all street silhouette plans and of an orthophotoplan attached to the cadastral map. More detailed information on the monitoring and follow-up, as well as on street silhouette plans, street spaces and the imaging of the peninsula, is presented in item 7 (c).

The Cultural Heritage Act defines the scope of territorial development protection of immovable cultural heritage, a very important part of which are the conservation regimes of immovable cultural properties as a basic tool for determining the restrictions, permissible interventions and the implementation of conservation activities. For the Ancient City of Nessebar are applied the approved and effective Conservation Regimes, which include specific prescriptions for the required characteristics of the structure on the territory within the boundaries of the property
and in the buffer zone of the peninsula and the continent, as well as in the aquatory. Prescriptions for conservation are defined for: urban structure, street and square spaces; architectural, archaeological immovable cultural properties; buildings without the status of immovable cultural properties; of complementary construction in the properties; the aquatory of the peninsula; movable objects and elements of urban furniture; public works; coastal strip, isthmus, continent; tourist activity; the strengthening of slopes; the construction of networks and facilities of technical infrastructure; transportation and communication services. etc. The shaping of street and square spaces and the carrying out of public works requires the application of natural, local, traditional building materials. Investment projects on the territory of the property are required to be preceded or developed simultaneously with a project for Volumetric Urban Development Survey with street silhouettes covering the construction in one to three neighbourhoods. Within the boundaries of the property, construction is required to obey the architecture of the traditional Nessebar house in terms of scale, proportions, processing and treatment of the façades. Buildings without the status of monuments are not allowed to exceed the closest and most visually perceptible immovable cultural property- representative of vernacular architecture. Requirements are also set for the buffer zone of the Ancient City, where the construction should be free, with low density and horizontal positioning on the terrain, so as to conform to the traditional development characteristics of the property and to ensure the preservation of the cultural landscape, including views of immovable cultural properties. For places where the integrity of the urban structure in terms of character and way of construction is violated, in order to restore it, work plans with silhouettes are also developed to the spatial development plans. Archaeological properties require ensuring exposure, integration and socialization of archaeological structures.

Prior to approval by the Municipality of Nessebar of development plans and investment projects for the territory of the Ancient City of Nessebar and its buffer zone, the National Institute of Immovable Cultural Heritage (NIICH) and the Ministry of Culture shall assess the eligibility of the proposed interventions on the basis of their compliance with the conservation regimes in force cited above. At the proposal of the Director of NIICH, development plans and investment projects, assignments, programs for the world heritage property are reviewed and discussed by the Specialized Expert Council on the Conservation of Immovable Cultural Properties (SECCICP) to the Minister of Culture. At the request of the Minister of Culture, SECCICP gives opinions on methodologies and technologies for conservation, restoration and integration of single and group immovable cultural properties.

The Inspectorate for the Protection of Cultural Heritage of the Ministry of Culture exercises control over the compliance with the provisions of the Cultural Heritage Act and the acts issued on the basis of it on the territory of Ancient Nessebar and its buffer zone such as: carry out inspections, participate in reception commissions of conservation and restoration works on immovable cultural properties, including archaeological studies, in commissions for establishing the status of immovable cultural heritage sites, as well as determining the type and volume of necessary fortification, conservation and restoration and repair works. (Annexes 3 and 3a)

- The Ministry of Culture finances underwater research in Ancient city of Nessebar in accordance with the recommendations of the advisory missions for the implementation of the long-term programme of the Centre for Underwater Archaeology.
• The **Action Plan** of the Sustainable Tourism Development Programme for the period 2018-2024 in the municipality of Nessebar developed projects for the territory of Ancient Nessebar related to the conservation and presentation of medieval churches and other architectural and archaeological properties.

• Five of the projects: “Conservation, restoration, exposure and adaptation of the ICP “Windmill (in the middle of the isthmus)”; “Conservation, restoration, exposure and adaptation according to authentic data of immovable cultural property “Windmill (at Eleusa, on the north coast); “Conservation, restoration, exposure and socialization of immovable cultural property church “Christ Pantocrator”; Conservation, restoration, exposure and socialization of immovable cultural property church “St. Archangels Michael and Gabriel” and “Development of park space and bazaar of movable objects” are united in a joint Project proposal “World Immovable Cultural Property - Ancient City of Nessebar”. The project proposal includes restoration, conservation and exhibition of 4 immovable cultural properties of national/world importance and creation of 1 revenue generating site. The project proposal has been submitted to the FLAG Fund and DZZD “Fund for Sustainable Cities” to provide financing in the form of a financial instrument and/or a grant under OP “Regions in Growth 2014-2020”.

• Directly related to the general strategy of the Municipality of Nessebar for preservation of the world property is the activity of the municipality in shaping the main pedestrian routes in the Ancient city by replacing the existing pavements of asphalt and concrete slabs with new pavements on the streets and stone slabs on the sidewalks:
  - In spring 2019, the first stage of the reconstruction of the street network of “The Ancient City of Nessebar” was completed, representing the replacement of the asphalt pavement with pavement along parts of streets “Messambria”, “Mitropolitsa” and “Mena”;
  - Currently, the second and third stages of the project for reconstruction of the street network of “Ancient City of Nessebar” are being implemented. Stage two includes “Ribarska” Str. and the rest of “Mena” Str. (funding provided under the “Balkan-Mediterranean 2014-2020” Programme with deadline for implementation April 2021);
  - The third stage involves reconstruction of the street network of streets “Aheley”, “Tervel” and “Hemus” (funding provided under the Maritime and Fisheries Programme 2014-2020 and deadline for implementation July 2021).

• The project “Black Sea Archaeological, Historical and Cultural Portal”, part of which is also Nessebar, was approved. The project is funded by the Joint Operational Programme for Cross-border Cooperation under the European Neighbourhood Instrument “Black Sea Basin 2014-2020”, Priority Axis 1.1. “Joint promotion of tourism and culture business and entrepreneurship”. Duration – 24 months Partners of the Municipality of Nessebar under the project are the Museum of National History and Archaeology in the city of Constanta, Romania and the National Museum of History of the Republic of Moldova. The main objective of the project is to promote cultural properties in the Black Sea basin region. The web portal, which will be created, will present 3D models of small archaeological sites, buildings, monuments and excavations. The portal will also include an integrated library system, a digitized collection of old maps and WEB-based GIS for georeferencing the presented objects. Individual users wishing to visit the region are among the target groups of the project.
Nessebar Municipality and the German Federal Foundation for Environmental Protection are developing a Project for Sustainable Restoration and Re-socialization of the Black Sea House, typical examples of which are numerous sites in Nessebar. The project is funded by the German Federal Foundation for Environmental Protection. The building of the Ethnographic Museum in the Ancient city, which the team will work on in the next two years, is one of the bright examples of a Black Sea house, so it has been selected as a reference for the project. Work will be done on a project for the artistic restoration of the building and its construction physics, will proceed to examine different parts of the building to assess their authenticity and the need for restoration activities.

Nessebar Municipality continues work on the project “Monuments in Nature: creative coexistence” in partnership with the “European Centre for Byzantine and Post-Byzantine Monuments” in the city of Thessaloniki, which also promotes Nessebar and its historical treasures. Partners in the project are Greece, Cyprus, Albania and Santorini. The Hellenic Centre for Marine Research (HCMR) and the Municipality of Nessebar explore and map underwater habitats in the city's aquatory. The aim of the study is to determine the impact of the human factor and the development of the tourism industry in the region in recent years on the biodiversity in the area around Nessebar. The coastal zone offers an opportunity for divers to see Black Sea plants and animals where underwater archaeological remains are also present. The aim of the project is to create an international database that will contribute to the effective conservation of cultural and natural resources in Greece, Bulgaria, Albania and Cyprus. The parties will be able to jointly test ways to mitigate the negative effects of high tourism flows.

Museum “Ancient Nessebar” together with a team from New Bulgarian University from the Departments of Archaeology and Natural Sciences launched field studies in 2020 on the territory of the municipality of Nessebar. The studies are carried out in connection with the implementation of two projects: “Landscape archaeology: models for the reconstruction of an ancient living environment” (No KII-06-H440/6) and “Reconstruction of material culture and knowledge of the ancient environment by methods of archaeological chemistry” (No KII-06-H39/9). The results obtained can be used to compare synchronous over time artefacts from different geographical areas, conduct conservation archaeological activities, study techniques for production of material objects and construction.

The municipality of Nessebar works towards digitizing the cultural heritage in order to preserve, conserve and maximize the access of more people to our cultural wealth. An interactive mobile application has been developed covering six of the most valuable monuments on the territory of the Ancient City of Nessebar - the Basilica of St. Sofia, the Church of St. John the Baptist, the Church of St. Stephen, the Church of St. Paraskeva, the Church of Christ Pantocrator and the Church of St. Spas.

In 2019 and 2020 underwater archaeological studies continue under the direction of the Centre for Underwater Archaeology in the peninsula aquatory and for the preparation of an assessment for possible minimal expansion of the boundaries of the world heritage property. Regular non-destructive archaeological study of graffiti from the medieval churches of Mesemvria with the support of the Ancient Nessebar Museum continues.

In 2019 and 2020 investment projects were approved and building or placement permits were issued for the following municipal sites in the “Ancient City of Nessebar”: 12
- “Conservation, restoration, exposure and adaptation of the ICP “Windmill (in the middle of the isthmus)” in LP 51500.501.484.
- “Conservation, restoration, exposure and adaptation according to authentic data of the ICP “Windmill (at Eleusa, on the north coast)” in SLP I, q. 18A according to the plan of Nessebar - Ancient city (LP 51500.501.515).
- “Major repair of “Lyuben Karavelov” Primary School in SLP I, q. 57A according to the plan of Nessebar - Ancient city (LP 51500.501.377)” including reforming the building in connection with the requirements of the conservation regimes of “Ancient City of Nessebar”.
- “Park space” and removable sites (café, kiosks and public toilets) in SLP IV, q. 18A according to the plan of Nessebar - Ancient city (LP 51500.501.516). The project covers part of the restored areas of Ancient Nessebar - the horizontal platform and the slopes in the north-eastern part of the peninsula and is in line with the adopted conservation regimes for the area.
- “Development of park space and bazaar of movable objects” in SLP I, q. 106 according to the plan of Nessebar - Ancient city (LP 51500.501.451) - The project will be implemented in buffer zone B in the southern part of the peninsula and is in accordance with the conservation regimes of the zone. The project envisions the improvement of the urban environment by removing old commercial buildings and placing fewer removable commercial pavilions with traditional wooden lining, as well as the construction of a small park space between the objects. Thus, the building density in the property is reduced from 100% to 36% and a new landscaping is realized on 30% of the property.

- Nessebar Municipality has prepared a Concept for applying of the Ancient City of Nessebar under OP “Regions in Growth” 2014-2020 under the procedure “Development of tourist attractions”. The sites applied for under the program are carefully selected on the basis of the conclusions and measures for maintenance, restoration, conservation and protection of the property from the “Monitoring Report on the Status of Sites with Status of Immovable Cultural Properties on the Territory of the Ancient City of Nessebar” prepared in 2019 on the basis of monitoring conducted in 2018 by specialists from NIICH and the Ministry of Culture (General Directorate “Inspectorate for the Protection of Cultural Heritage”). The selected sites affect all three categories, which were included in the list of UNESCO when the Ancient City of Nessebar was accepted, namely:

I. Archaeological heritage - Archaeological structures from the 2nd century BC and preserved remains of a Black Sea Greek colony - fortress walls:

II. Medieval churches:

III. Residential buildings - representatives of “Vernacular Architecture”;

IV. Other sites ICP - fountain, windmills.

The concept includes the following sites:
- “Fortress walls in the western part of the peninsula, western gate” in SLP I, q. 2. city of Nessebar - the Ancient city
- “Fortress walls in the southern part of the peninsula” in SLP I, SLP II in q. 51 and SLP IX, q. 50, city of Nessebar - the Ancient city;
- “Nessebar Theatre Zone” in LP 51500.501.457 on the CM of Nessebar
- "Early Byzantine Thermae" in SLP I, q. 3 (LP 51500.501.306) and SLP II-216, q. 3 (LP 51500.501.305), city of Nessebar - the Ancient city;
- "Water supply system - tank and underground galleries" in SLP V-350, q. 57 (LP 51500.501.389), city of Nessebar - the Ancient city;
- Church "St. St. Archangels Michael and Gabriel" in SLP IV, q. 10, city of Nessebar - the Ancient city;
- Church "Christ Pantocrator" in SLP I, q. 56, city of Nessebar - the Ancient city;
- Church "St. Kliment" in SLP IV-248, q. 48, city of Nessebar - the Ancient city;
- Church "St. Bogoroditsa Eleusa" in SLP I-4,7, q. 18a, city of Nessebar - the Ancient city;
- Church "Stara mitropolia" in SLP I, q. 40, city of Nessebar - the Ancient city;
- Church "St. Dimitar" in SLP IV, q. 13, city of Nessebar - the Ancient city;
- Church "St. Todor" in SLP I, q. 20, city of Nessebar - the Ancient city;
- "Ethnographic Museum - House of Moskoyanevi" in SLP I, q. 34, city of Nessebar - the Ancient city;
- "Fountain at the old Mitropolia", city of Nessebar LP 51500.501.263 under the CM of the city of Nessebar - the Ancient city;
- "Windmill on the isthmus" in LP 51500.501.484 under the CM of city of Nessebar - the Ancient city;
- "Windmill near Eleusa Church" in SLP I-4,7, q. 18A according to the plan of the city of Nessebar - the Ancient city;
- "Reconstruction of the street network" in the city of Nessebar - the Ancient city;
- "Development of park space and bazaar of movable objects" in SLP I, 1. 106 according to the plan of the city of Nessebar - Ancient city (LP 51500.501.451)

Tasks for the preparation of projects for conservation and restoration of the above sites have been submitted for coordination to NIICH in accordance with Art. 84 of the CHA.

6. **Urges the State Party to devise a strategy for the future of Nessebar, based on sustainable, compatible and equitable development of the town, centred on its OUV;**

By the entered into force in March 2020 Amendment and Supplement Act to the Law on Regional Development, to the System of Documents for Strategic Planning of Regional and Spatial Development is included the development of a plan for integrated development of a municipality covering a period of 7 years. In fulfilment of this requirement, a draft Integrated Development Plan for Nessebar Municipality for the period 2021-2027 has been developed by the municipality. This strategic document analyses the economic, social and environmental situation of the municipality of Nessebar and is in line with the objectives of the EU cohesion policy for the period 2021-2027 - "Europe closer to citizens by promoting sustainable and integrated development of urban, rural and coastal areas and local initiatives". The Integrated Development Plan of Municipality (IDPM) includes regional and spatial development on the territory of the municipality, links the comparative advantages and potential at the local level with a clearly defined vision, medium-term goals and priorities with the idea/aspiration for sustainable development, better social environment and higher standard of living of the people in the municipality. It identifies project ideas, defines current problems, perspectives and development needs.

In order to ensure the active participation of the residents, a poll was published on the website of the municipality in which they can make their proposals. On February 19, the plan was published
on the website of the Municipality of Nessebar for public consultation in accordance with Art. 20, para. 2 of the Regulations for the Implementation of the Regional Development Act. Then, together with a protocol of the observations and comments received from the public consultation, it will be submitted for adoption by the Municipal Council - Nessebar.

According to the Cultural Heritage Act, the Plans for the conservation and management of immovable cultural properties are developed and implemented in cooperation with the forecasts of the plans for integrated development of municipalities. The priority place in the Integrated Development Plan of Nessebar Municipality for the period 2021-2027 is occupied by the Ancient city of Nessebar.

A strategic objective of the plan is: Preservation and effective use of cultural and historical heritage with competitive tourist advantages of the Outstanding Universal Value of Ancient Nessebar (Strategic Objective 4).

One of the priorities of the plan, which concerns the Ancient city, is: “New approach to the cultural heritage of the Municipality of Nessebar and measures for its conservation, use and management (Priority 4). The specific focus of this priority provides for a system of measures for the conservation and use of cultural heritage. Special emphasis is placed on “The Ancient City of Nessebar”. The measures in this priority cover the entire municipality of Nessebar, but are directly or indirectly aimed at preserving the authentic atmosphere of the Ancient city, which is one of the main tourist attractions on the Southern Black Sea coast. For local authorities and citizens of the municipality of Nessebar heritage is perceived as a factor for sustainable development, which is capable of increasing the quality of life and well-being of the population. The following measures have been identified to implement the priority:

*Measure 4.1. Implementation of a modern marketing strategy for advertising and promotion of the municipality with emphasis on the unique historical and cultural heritage of the common human property, such as the “Ancient City of Nessebar”;

*Measure 4.2. Provision of new tourism services and activities in line with current user requirements;

*Measure 4.3. Support and development of local cultural institutes for the benefit of all representatives of the local community;

*Measure 4.4. Targeted activities and specific projects for reconstruction and renovation of public buildings of historical and cultural importance, emblematic for Nessebar as a tourist destination.

Priority impact area - area with specific characteristics is First zone with sub-area “Ancient Nessebar”

In item 8.2. Tourism Development Program (although the Municipality has a separate “Sustainable Tourism Development Programme in Nessebar Municipality 2018-2024”) it is again emphasized on the enormous importance of the “Ancient City of Nessebar” as the only Bulgarian city with World Heritage status.

The Programme for the realization of IDPM Nessebar sets out the measures and activities to Priority 4 “New Approach to the Cultural Heritage of Nessebar Municipality and Measures for its Conservation, Use and Management” (Annex 4)
7. **Strongly requests the State Party to:**

a) **Establish as a matter of high priority the proposed high-level inter-ministerial committee, supported by a working group and by all relevant institutions, tasked with the development of an OUV-based shared vision for Nessebar, which orients all present and future decisions about the property's enhancement and development, and will be pivotal for all current and future plans and projects.**

According to the Regulation of the Council of Ministers on Plans for the Conservation and Management of Immovable Cultural Properties, these plans to the 20-year programme define a long-term vision for the cultural and socio-economic development of the property, as well as a long-term vision for the necessary projects and activities for the conservation, maintenance, use, and presentation of the immovable cultural property. The Conservation and Management Plan shall also designate the management body and its expert advisory board.

Until the entry into force of the Conservation and Management Plan, which should develop the long-term vision for the Ancient City of Nessebar, a body that has the power to make proposals to the Minister of Culture for setting strategic objectives for the management and preservation of cultural heritage and an action plan under Art. 12, para. 2 of the Cultural Heritage Act, as well as to consider and rule on project proposals, is the Specialized Expert Council for the Conservation of Immovable Cultural Properties. The SECCICP is nationally represented and includes representatives of: The Ministry of Culture, the Ministry of Regional Development and Public Works, representatives of the specialized institutes at the Bulgarian Academy of Sciences: the Head of the Inspectorate for the Protection of Cultural Heritage; the Director of the National Institute of Immovable Cultural Heritage; the Director of the Centre for Underwater Archaeology; a representative of the Chamber of Architects; a representative of the Union of Architects; a representative of the BNC of ICOMOS and other professional and non-governmental organizations, experts in conservation and restoration. SECCICP gives opinions and proposes to the Minister of Culture solutions for defining regimes for conservation, coordination and acceptance of assignments, programmes, development plans, investment projects, draft conservation and management plans. In connection with the formation of an expert opinion on specific conservation issues, specialized expert committees (SEC) may be established by a decision of the council on: architectural and construction immovable cultural properties; 2. archaeological immovable cultural properties; 3. artistic immovable cultural properties.

b) **Finalize, adopt and implement the Conservation Management Plan which incorporates an updated Sustainable Tourism Management Plan, Detailed Development Plan and General Development Master Plan, including guidelines for urban design, based on the OUV of the property, as well as continue enforcing the existing protection regimes.**

**Under the Conservation Management plan:**

NIICIH, in cooperation with the Municipality of Nessebar, is preparing the draft of the Conservation and Management Plan of the Ancient City of Nessebar. In relation to the resulting changes in the conservation status, as well as according to the current strategic documents, a report has been prepared regarding the part of the management of the immovable cultural
properties (ICP). The report contains the following parts: Analysis and evaluation of the management part of the project of the CMP from 2011 ("Scientific and experimental development - "Conservation and management plan of the town of Nessebar - old town"); Study of good practices: Consultations with the Municipality of Nessebar, Museum "Ancient Nessebar", field and documentary studies. All systems at state and local level and cultural institutes involved in the management and financing of the conservation, management, presentation and promotion of the cultural heritage of Ancient Nessebar, current as of 2021, have been studied and analysed. An analysis is made of the current management system of Ancient Nessebar, the changes in the municipal structure after 2011 in order to improve management, as well as the relations with other stakeholders in connection with the possible implementation of the integrated management approach recommended in the Guidelines for the implementation of the Convention (1972) (GIC, paragraph 112 (2019). It was found that the municipal structure responsible for the management of the property was developed in accordance with the proposals in CMP (2011). The report recommends that the CMP project be shorter in content and based on the state of play of the historic city, paying more attention to the Governance part. Given the specifics of the Ancient City, management system and approach for the implementation of the plan shall be chosen, which ensure the sustainable development of the Ancient City, preservation of the attributes of the OUV and be consistent with the Guidelines for the implementation of the World Heritage Convention.

The task of the CMP project is to achieve synchronization with all strategic and programme objectives and forecasts set out in the current (or in the adoption procedure) strategic documents of the Municipality of Nessebar, as well as interaction with the forecasts of plans for integrated development of municipalities and spatial plans for the territorial scope of single or group immovable cultural properties (according to the amendment of the Cultural Heritage Act which entered into force on 13.03.2020):

- General development plan of the Municipality of Nessebar;
- Integrated Development Plan of Nessebar Municipality for the period 2021-2027;
- Sustainable Tourism Development Programme in Nessebar Municipality 2018-2024;

The CMP project should take into account the change in cultural, social and economic factors and the opening of new opportunities to express the potential of the attributes of the Outstanding Universal Value of immovable cultural property, including as a resource for sustainable development in terms of:

- the sustainable management of the Ancient City of Nessebar and the aquatory;
- sustainable tourism and visitor management;
- management of intangible cultural heritage.

The prepared complete graphic documentation for the Ancient City of Nessebar (schemes, photographed street silhouettes and spaces, the available geodetic and photogrammetric imaging of all medieval churches, map material, orthophotoplan); the adopted conservation regimes of the Ancient City of Nessebar, containing prescriptions for conservation of the territory of the property and its buffer zone; the monitoring of the state of immovable cultural properties and of the urban environment, on the basis of which the analysis and assessment were prepared and the necessary guidelines, measures and activities for preservation and restoration, where necessary, of the attributes of the OUV, form part of the conservation/protection plan to the Plan for conservation and management of the property. The plan will also include the conservation regimes of the Ancient City of Nessebar from 2015, the specific rules and norms of the
development plans, the decisions of the World Heritage Committee and the recommendations of the advisory missions carried out in 2015 and 2017 and the joint ICOMOS/World Heritage Centre missions for reactive monitoring carried out after 2010.

The remains of the ancient part of Messambria submerged in the aquatory constitute an underwater cultural heritage, the quality of which is undeniable and is regarded as an attribute of the Outstanding Universal Value of the Ancient Nessebar. On the other hand, the city's centuries-old history shows that life in it has not subsided and different cultures have left their mark on the traditions of the peninsula. Nessebar is a living historical city with a living heritage. Given these characteristics of Ancient Nessebar, the CMP project is prepared by specialists in the areas of the three conventions:

- The Convention for the Protection of Cultural and Natural Heritage;
- The Convention for the Protection of the Underwater Cultural Heritage;

Meanwhile, despite the fact that the project of the 2011 PMU ("Scientific and experimental development" Plan for protection and management of the town of Nessebar - old town ") has not entered into force, much of the activities envisaged in the long-term program (" specific tasks ") have been completed or are in the process of being implemented (Annex 5)

**Under General Development Master Plan (GDMP):**

The project of GDMP of the Municipality of Nessebar included an analysis of the status and characteristics of the Cultural and Historical Heritage System, summarized conclusions and formulated trends and guidelines for development. The spatial and functional organization of the territory and the spatial aspects in conservation are considered as part of the objectives and tasks of the GDP with regard to: justification of a territorial-systematic approach to the immovable and movable attributes of cultural and historical monuments with possibilities for integration of the Cultural and Historical Heritage system with other functional systems; application of specific planning tools (rules and regulations) in the conservation and use of cultural heritage as an element of the living environment; combining cultural tourism with maritime tourism and the possibility to overcome the highlighted seasonal character of maritime tourism.

The delay in the completion of the development of the General Development Plan of the Municipality of Nessebar is due to the additional reflection of updated specialized maps in the plan of seaside beaches and dunes and protected areas and zones, namely:

- Reflection of the boundaries of the sea beaches and dunes according to the specialized maps and registers of the Agency for Geodesy, Cartography and Cadastre;
- Reflection of the boundaries of protected areas NL “Sand Dunes 5 pcs. Nessebar”, NL “Sand Dunes in a. Babata”, according to a draft order of the Ministry of Environment and Water (MoEW) dated 2018;

It is evident from the above that the last modification of the boundaries of the protected areas is from the end of 2020. The GDP project has been updated in a timely manner and was sent in January 2021 for an Environmental Assessment by a licensed company. Once drafted, the GDP project will be submitted for coordination to the MoEW. (Annex 6 - reference plan)
For conducting the conciliation procedure under the Cultural Heritage Act (CHA), in June 2020 the draft GDP was submitted for preliminary discussion to the National Institute for Immovable Cultural Heritage, from where additional textual and graphic materials were requested. The municipality of Nessebar is to submit the complete project documentation for coordination under theCHA.

The Detailed Development plan (DDP) specifies the design and construction of each land property (LP) within the scope of the plan. The municipality of Nessebar has prepared an assignment for drafting the Detailed Development plan of the Ancient city of Nessebar, by which the National Institute of Immovable Cultural Heritage (NIICH) provided the municipality with street silhouette plans on the territory of the reserve, as well as data from the monitoring carried out in 2018 for the status of a large part of immovable cultural properties on the territory of the world heritage property, to align the assignment with the results of the monitoring. Since under the Spatial Planning Act the Detailed Development Plan is developed on the basis and in accordance with the General Development Plan for the settlement or municipality, the development and adoption of the DDP will be carried out after the entry into force of the GDP.

Under the Integrated Development Plan of Nessebar Municipality 2021-2027:
The integrated development plans of the municipality are a new strategic document, regulated by an amendment of the Regional Development Act from March 2020. These plans define the medium-term goals and priorities for sustainable development of the municipality, the relations with other municipalities and the general development plan of the municipality, provide spatial, temporal and factual coordination and integration of different policies and planning resources to achieve the defined goals for lasting improvement of the economic, social and environmental status of the municipal territory. The Integrated Development Plan of Nessebar Municipality has been prepared and is currently published on the website of the municipality for public consultation, after which it will be submitted for adoption to the Municipal Council of Nessebar Municipality.

Under the Sustainable Tourism Development Programme in Nessebar Municipality for the period 2018-2024:
A Sustainable Tourism Development Programme in the Municipality of Nessebar for the period 2018-2024 was adopted by a decision of the Municipal Council. The vision, objectives, priorities, measures and projects of the Programme are systematized in the Strategic Framework for the development of the municipality as a tourist destination. The activities included in the most important part relate to Ancient Nessebar and its importance for the development of tourism.

The Action Plan of the Sustainable Tourism Development Programme developed financially linked projects for: ensuring the well-being and presentation of medieval churches, architectural and archaeological cultural properties; socializing the spaces around the churches through demonstrations of various traditional crafts; controlling tourist activities; coordinating the interests of the local population and tourists.

Currently building permits have been issued for projects for “Conservation, restoration, exposure and adaptation of immovable cultural property “Windmill (in the middle of the isthmus)“ and “Conservation, restoration, exposure and adaptation according to authentic data of immovable cultural property “Windmill (near the church “St. Bogoroditsa Eleusa”, on the north coast). Projects for conservation, restoration, exposure and socialization of medieval churches “Christ
Pantocrator” and “St. Archangels Michael and Gabriel” have also been developed, which have been submitted for coordination to the National Institute for Immovable Cultural Heritage under the Cultural Heritage Act.

For the development of cultural and cognitive tourism and the establishment of Ancient Nessebar as a spiritual centre, the action plan envisages the development of new cultural and historical routes, in addition to the one currently implemented in the first stage “Spiritual Road”. The idea is to implement the following five routes: “The Hidden Messembria”; “In the Streets of Nessebar”; “Through the Eyes of Oberbauer”; “Temples of Nessebar”; “Via Pontica: Messambria - Anchialo - Apolonia Pontica”. To strengthen capacity, training courses for specialist personnel for religious, cultural, festival and other types of tourism are planned. It is planned to establish and maintain systems for monitoring the environmental impacts of tourism and for measuring the economic and socio-cultural impacts of tourism.

Cultural events and events taking place on the territory of Ancient Nessebar are part of the annual cultural calendar of the city and are a major tool for promoting the tangible and intangible cultural heritage. They are organized against the backdrop of cultural landmarks. The festival “Messambria Orfika” is held in the Basilica of St. Sofia (Old Mytrupolitissa), which has magnificent acoustics; on the summer stage of the Amphitheatre, located at the foot of the medieval church “St. Yoan Aliturgetos” and on the southern fortress wall are held most of the international festivals, organized by the municipality and the municipal cultural community centers (chitalishta) - “Sun, Joy, Beauty”, European and World Folklore Championships, International Festival for People with Disabilities “Nessebar without Borders”, etc. Other festivals with international participation are: “Nessebar - Island of the Arts”, “Constellations in Nessebar”, “Nessebar Jewelry” Folklore Festival.

Nessebar Municipality is also one of the most active municipalities aimed at preserving the Intangible Heritage Element of Bulgaria, namely the “Bulgarian Chitalishta”, entered in 2017 in the Register of Good Practices for the Protection of Intangible Cultural Heritage of Humanity. The Bulgarian Chitalishta are cultural centres created by the communities themselves and are accessible to all regardless of their age, gender, political and religious views. Their activities are aimed at preserving customs and traditions. They are crucial to the process of transferring intangible cultural heritage, as older members play a key role in promoting youth inclusion. Over the years, the number of participants in their activities, representing all ages and population groups, has increased. The municipality maintains two Chitalishta located within the boundaries of the world property: National Chitalishta “Yana Laskova - 1905” and National Chitalishta “Messemvria - 2015”.

Cultural tourism is well developed on the peninsula, but due to the pandemic situation in 2020, visits to museum sites have decreased strongly. According to data from the Ancient Nessebar Museum, the visitors with paid entrance are: in 2018 - 145 105; in 2019 - 145 792, and in 2020 - only 26 192 people. As evidenced by these official figures, the decline in the number of visits in 2020 compared to previous years is close to 80 percent. One of the tasks of the Ancient Nessebar Museum is to increase the number of visitors outside the active summer tourist season. For this purpose, two sites are open all year round (since 2018) - the Archaeological Museum and the Church of St. Stephen. After the implementation of the projects for conservation, restoration and socialization of the church “Christ Pantocrator” and House “Mosboyani” (Ethnographic Museum), it is envisaged that they will be opened permanently. Other sites can also be visited.
year-round upon prior request. The municipality of Nessebar makes efforts to implement initiatives that contribute to year-round visits and tourism, including on the peninsula.

Some of the events and initiatives that take place outside the summer season are:

- International Festival “Messembria Orfika” - in September;
- Festival “Autumn in Nessebar” in October;
- “Autumn Passages 2020” Festival - traditional fish festival (October), which in 2020 is implemented under the Maritime and Fisheries Program. The aim is to promote the fishing area of Nessebar and to protect the intangible cultural heritage;
- International contest “I love the Black Sea” - part of the program of the municipality of Nessebar to celebrate October 31 - International Black Sea Day;
- Festival “In love with Nessebar” - in February.

Under the Urban design guidelines:

In 2019, the Municipal Council - Nessebar adopted an Ordinance on the terms and conditions for placement and removal of movable objects, elements of urban furniture, advertising, information and monumental-decorative elements on the territory of the municipality. It also determines the types, purpose and requirements for the layout and placement of the cited objects, as well as the powers of the individual units of the municipal administration to implement the ordinance. According to the Ordinance, the scheme for placement of advertising and information elements within the boundaries and buffer zones of immovable cultural property “Ancient City of Nessebar”, prior to its approval by the chief architect of the municipality, is coordinated in accordance with the Cultural Heritage Act. Also when examining applications for placement of advertising and information elements within the boundaries and buffer zones of Ancient Nessebar, a representative of the Municipal Museum “Ancient Nessebar” participated in the committee.

Municipal Council - Nessebar has approved the “Scheme-Concept of the advertising and information elements on the territory of Ancient Nessebar”, coordinated with the Ministry of Culture, which is published on the website of the Municipality of Nessebar. (http://nessbarinfo.com/nessbar-world.php ; http://citybuild.bg/news/chadyrte-pergolite-starinen/19416). The concept also contains rules for placement of the advertising and information elements.

In the conservation regimes of the Ancient City of Nessebar are placed many and specific requirements for the elements of urban furniture. Urban furniture elements are required to take into account the character, structure and scale of urban spaces. Local transport stops, street lighting, benches, public fountains, city clocks, marking streets and squares, waste containers, etc., are covered. These elements must be elaborated and placed on a common project approved and coordinated in accordance with the order of the Cultural Heritage Act, meeting the following requirements:

- a deployment scheme, complete with a technical design of the relevant parts, shall be drawn up for each of the elements;
- the design and materials for making the elements shall be subject to a uniform concept of urban furniture;
- the marking of streets and squares shall be carried out with uniform signs drawn up under a special artistic project, in accordance with the common project;
- waste containers shall be made and placed at locations specified by the common design and, depending on the nature of the waste, shall be designed with a uniform design, but with different spatial and technical characteristics.

The placement of additional roofs, canopies, antennas, air conditioning cabinets and other non-essential elements with participation in the perception of the urban environment on the façades and roofs of buildings and on the fences in front of the street regulation line is not allowed. Conditions are laid down for: sunscreens, umbrellas and pergolas; tables, chairs and benches. Advertising units are required not to obscure characteristic architectural details of the building and are made of: stone, wood, metal, textiles. Mobile advertising on a commercial site is allowed within its working hours, by placing a maximum of one item directly in front of the entrance, located on a selected typical movable object, or directly on the ground, at 0.30 m in front of the façade, with a length and height of not more than 1.0 m.

When shaping street and square spaces and conducting public works, natural, local, traditional building materials should be applied; the pavement of street and public spaces should be entirely made of natural stone in the structure and scale of the traditional cobblestone pavement, and also pavement is allowed.

Appropriate embedding (cashing), according to the specificity of the specific site, is required for the overhead installations of the technical infrastructure, according to an individual architectural design. Installation and other technical elements such as solar panels, air conditioning boxes, mobile operators' stations, etc. are not allowed on the visible from public spaces façades and roofs of buildings.

**Under enforcing the existing conservation regimes:**

The application of the current conservation regimes of the Ancient City of Nessebar is taken into account in the preparation of the project documents. When conducting the conciliation procedure under the Cultural Heritage Act, the National Institute of Immovable Cultural Heritage and the Ministry of Culture assess the admissibility of proposed interventions on the territory of the property and in its buffer zone in terms of their compliance with these regimes. Under the Cultural Heritage Act, conservation regimes are included in conservation and management plans.

c) **Further develop the overall sustainable mobility programme to ensure the smooth circulation of residents, visitors and goods within the property, and between the mainland and the property.**

Currently, the municipality of Nessebar is preparing a General Plan for Organization of the Traffic in the Ancient City of Nessebar. The plan is expected to be adopted by the Municipal Council - Nessebar in spring 2021 and will enter into force for the upcoming tourist season. The G POT shall be drawn up on the basis of historical traffic data collected and shall also contain a graphical part. The duration of the G POT will be 5 years, and in the absence of significant changes in the environment it will be renewed for a further 5 years.

The mobility of residents, goods and visitors on the territory of the Ancient City of Nessebar is organized on the basis of normative documents at national and local level: laws (Spatial Planning Act; Road Transport Act; Clean Ambient Air Act; Environmental Noise Protection Act; Municipal Property Act, etc.), regulations:
• Ordinance No. РД-02-20-2 in force from 20.02.2018 on planning and design of the communication and transport system of the urbanized territories, in which one of the main objectives is reporting, preservation and development of the existing architectural, historical and cultural environment;
• Ordinance No. 7/2000 on rules and norms for the planning of different types of territories and development zones, which also determines the structure of objects of transport and traffic: garages and parking lots, bus stations, pedestrian lanes and areas, bicycle lanes, yacht ports, etc.;
• Ordinance No. РД-02-20-2 of 26.01.2021 (in force from 13.03.2021) on determining the requirements for accessibility and universal design of the elements of the accessible environment in the urbanized territory and of the buildings and facilities;
• Ordinance of the municipal council for ensuring public order, tranquillity and protection of citizens, for the protection of municipal property and the environment, for the traffic safety on the territory of the municipality of Nessebar, according to which the organization of traffic, transport schemes, traffic routes and stops of public transport vehicles, locations of taxi cabs are determined by the municipal administration after a decision of the municipal council - city of Nessebar and in agreement with the Ministry of Interior;
• Ordinance No. 10 of 27.03.2019 of the Municipal Council on the terms and conditions for placement and removal of movable objects, advertising, information and monumental-decorative elements on the territory of the municipality of Nessebar requires that the movable objects do not hinder the accessibility and passage of the urban environment and do not endanger the safety of traffic on the streets and do not hinder the pedestrian flow.

The mobility of people and cargo on the peninsula and the connection to the land and the nearby resort complex Sunny Beach is carried out by buses and taxi transport, trucks and cars, cycling and pedestrian traffic. To regulate the tourist flow during the summer season and to facilitate pedestrian traffic and access on the territory of the Ancient City of Nessebar, every year no later than 15.05 the Municipal Council adopts a Traffic Organization and Safety Scheme. For 2019 and 2020, the restrictive regime has been in place since 1 April, and for 2021, restrictions on the movement of motor vehicles within the peninsula come into force from 15 April. Parking of vehicles within the urban structure of the property is completely prohibited, including for the residents of the Ancient city. An hourly schedule has been set for supplying the retail outlets. Unidirectional traffic is introduced, only cars with a pass are allowed and two crossing points equipped with automatic barriers driven by programmed magnetic cards are defined. Parking spaces, both for buses with tourists and private vehicles, are defined in the areas acquired by the sea. The parking lot on the north coast is located on such acquired territories and has existed for a long time. Due to the ban on parking private cars of residents of the Ancient city in the urbanized territory of the peninsula, residents use this parking lot. On the territory of the New Town, not far from the isthmus, there are 4 parking lots. Parking lots operated by the municipality provide a number of parking spaces for road vehicles transporting people with disabilities with the best access to the entrances. For each dwelling occupied by people with disabilities on the territory of Nessebar Municipality, a parking space is determined. Significant funds have been invested in introducing modern technology to manage parking lots and direct traffic to them.

On the territory of the Ancient city are installed active year-round technical means to prevent the traffic of motor vehicles around some of the medieval churches. The square and public spaces
around the majority of the churches are well-developed. The implementation of the project for gradual replacement (completed first stage, implementing second and third) of the existing pavements of asphalt and concrete slabs with new pavements on the streets and stone slabs on the sidewalks also contributes to improving the organization of traffic in the Ancient city. The coastal alleys of the peninsula and the continent are accessible to pedestrians and cyclists. Panoramic and bicycle alleys have been built in the old part and along the north coast of the new part of Nessebar. Through the last alley is provided an alternative fast transport connection between the city of Nessebar - old part and the resort complex Sunny Beach. Along the isthmus bilaterally on the lane are separated alleys for “soft” forms of traffic: pedestrian traffic, bicycles, rickshaws. In order to limit motor transport traffic and reduce environmental pollution, local transport in Nessebar is also organized with mini trains that connect the old with the new part of the city and Sunny Beach. The use of bicycles and attraction trains is carried out only in the recreation and entertainment areas, and the route and number of trains is determined by an order of the mayor of Nessebar Municipality.

The number of visitors for cultural and cognitive purposes is reported by the number of visits to the eight museum sites with controlled access on the territory of the Ancient city. In 2020, due to the pandemic situation, visits fell by about 80%. (for 2017-126095 visitors: for 2018-145105; for 2019-145792; for 2020-26192) (Annex 7 - table). These statistics, submitted by the Ancient Nessebar Museum, show that at the moment no serious pressure on the territory of the world heritage property can be mentioned.

With regard to water-borne transport and the likelihood of large groups of tourists entering the peninsula from the sea, the port terminal (the port with the Maritime Station) is currently with dampening functions. In recent years, only a very small number of ships have landed on it: in 2017 - 1 (with 102 passengers) and in 2018 - no cruise ships. In the period 2019-2020 Port Terminal Nessebar was visited by one ship in October 2019 and 761 passengers were served. (Annex 8)

The scheme adopted by a decision of the municipal council contributes to regulating mobility on the territory of the Ancient City of Nessebar, traffic safety, ensuring the smooth movement of pedestrians and goods and improving the environmental situation, as well as to improving the connection between transport and tourism. Further improvement is expected after the entry into force before the tourist season of the General Plan for Organization of Traffic in the Ancient City of Nessebar.

d) Continue to allocate financial and human resources required for effective implementation of the updated Conservation Management Plan and updated General Development Master Plan.

The Ministry of Culture provides human resources for inspections and monitoring of the territory of the Ancient City of Nessebar, as well as for the consideration of development plans and investment projects affecting the property. The following institutions to the Ministry are engaged in this activity: Inspectorate for the Protection of Cultural Heritage, the National Institute for Immovable Cultural Heritage, the Centre for Underwater Archaeology and the advisory body to the Minister of Culture Specialized Expert Council for the Protection of Immovable Cultural Property. In recent years, the Ministry has funded underwater archaeological studies in the Ancient Nessebar area, conducted by specialists from the Centre for Underwater Archaeology.
and the National Institute with Museum at the Bulgarian Academy of Sciences (including equipment for geodetic imaging underwater), as well as the study of graffiti with ships in medieval and post-medieval churches.

The National Institute for Immovable Cultural Heritage provides a resource of experts and financial resources for monitoring the condition of the Ancient City of Nessebar, drawing up maps, graphic and text materials; geodetic imaging and photographing of street silhouettes and spaces, photogrammetric imaging of medieval churches, orthophotoplan on the peninsula, attached to the cadastral map, etc. Financial means shall be provided for the purchase of the technical equipment necessary for the performance of the imaging. Priority has been given to the work on the CMO project, for the implementation of which NIICH, by assigning an external expert, finances the elaboration of part of the CMP project.

After the establishment in 2017 to the Municipality of Nessebar, the Municipal Fund “Culture” began to accumulate funds for financing projects for conservation, restoration and socialization of immovable cultural properties and other activities related to the preservation of the cultural property. Projects for conservation, restoration, exposure and adaptation of two windmills (on the isthmus and in the Ancient city) have been prepared through funding from the Municipal Fund “Culture”. Through funding from the Fund, teams of external experts have prepared: “Heritage Impact Assessment and Report on the Scope of the Project Proposal “Rehabilitation and Modernization of the Fishing Port “Severna buna” and “Scope Report to the Heritage Impact Assessment” in connection with the investment intention of new construction for a school, sports hall and exposure of cyst graves in part of the terrain of the “Ancient necropolis of Messambria”, falling within the buffer zone of the Ancient City of Nessebar. During this period the Municipality of Nessebar has provided external and own funding for three projects for reconstruction of streets (replacement of asphalt with stone pavement), financed and implemented under the “Interreg Programme for Cross-border Cooperation Bulgaria-Turkey”; the “Monuments in Nature - Creative Coexistence” project, acronym MoNa funded under the “Balkan-Mediterranean 2014-2020” programme; the Maritime and Fisheries Programme 2014-2020. The Maritime and Fisheries Programme 2014-2020 finances the organization of the “Autumn Passages 2020” Fish Festival, which aims to promote the Nessebar fishing area and contributes to the preservation of the intangible cultural heritage of the city. Nessebar Municipality has provided financial and expert resources for the preparation of the General Development Plan and the Integrated Development Plan of the municipality.

In 2020, the Municipality of Nessebar has deposited a project proposal “World Immovable Cultural Property - Ancient City of Nessebar” before the Fund FLAG and DZZD “Fund for Sustainable Cities” to provide financing in the form of a financial instrument and/or a grant under Procedure BG16RFOP001-6.002 - Development of tourist attractions by OP “Regions in Growth 2014-2020”, for four projects, three of which for conservation and restoration of immovable cultural properties and one for movable objects “Bazaar and Park Space”, in order to remove temporary structures and refine the urban environment in the buffer zone of the reserve of the peninsula.

In the early 2021 the Municipality of Nessebar received a grant contract for the project “Waste reduction in the territory of the city of Nessebar through cleaning actions and awareness campaigns for the local population: protection of marine natural and cultural heritage as a public responsibility and resource for local traditional livelihoods” under the Environment Protection
and Climate Change Programme

For the implementation of these projects, the municipality has provided financial resources for plot plans, work design, preparation of application forms, financial analysis of construction works. These activities are also in line with the 2017 Advisory Mission Recommendation on “securing funding for broader conservation interventions”.

The specialized structure of the Municipality of Nessebar the department “Nessebar - World Heritage” and the Ancient Nessebar Museum provide at local level human and financial resources for preservation, socialization and promotion of the cultural heritage of Ancient Nessebar, maintenance of architectural and archaeological museum sites and their environment, organization of museum exhibitions and other cultural events. Over the past three years, the Ancient Nessebar Museum has provided financial and expert resources in cooperation with the municipality for the step-by-step conservation and restoration of endangered icons from the Icons and Church Plate Fund. Through a winning project in 2020 the museum “Ancient Nessebar” provides delivery and installation of a multimedia system for the needs of the museum to improve the tourist service of visitors and introduction of new interactive methods in the presentation of the cultural and historical heritage of Nessebar.

e) Continue to implement the recommendations of the 2018 mission as well as all previous mission recommendations that are yet to be addressed;

In recent years the interaction and coordination between national and local authorities on the issues of the preservation of Ancient Nessebar has been strengthened. The Ministry of Culture is in constant contact with the Municipality of Nessebar, the National Institute for Immovable Cultural Heritage, the Centre for Underwater Archaeology, the Directorate for National Construction Control, the General Directorate “Inspectorate for the Protection of Cultural Heritage”, the National Commission of Bulgaria for UNESCO. Correspondence is held with the Ministry of Transport, Information Technology and Communications and the Executive Directorate “Maritime Administration”, the Ministry of Environment and Water, the Ministry of Regional Development and Public Works. Despite the pandemic situation, Nessebar Municipality seeks to ensure the participation of the population in the development of strategic documents with regard to Ancient Nessebar (e.g. preliminary online survey; public discussion of Integrated Development Plan of Nessebar Municipality 2021-2027). The Bulgarian side, in joint efforts of the state and municipality, has taken a number of measures and has made efforts to preserve and improve the state of conservation of the Ancient City of Nessebar by working both on the implementation of the decisions of the World Heritage Committee and on the implementation of the recommendations of advisory missions and reactive monitoring missions.

- On recommendation of the 2018 mission to undertake effective measures to create around the monuments public spaces properly paved and conveniently arranged in the simplest way, reserved for pedestrians and inaccessible to cars, where street retailing and outdoor restaurant areas are not allowed, as well as to undertake a projects for the restoration of the religious remains, has been largely implemented:

In the last ten years, the municipality has taken and continues to take effective measures for the preservation of immovable cultural properties, especially for the sites of religious architecture, as well as for the restoration of public spaces around them (they are shaped with stone pavement.
including in most of the streets asphalt has been removed and replaced with stone pavement). Churches “St. Archangels Michael and Gabriel”, “St. Paraskeva”, “St. Yoan Krastitel” and “St. Spas” are connected in the cultural route “Faith in Nessebar” (stage of “Spiritual Road”) marked discreetly in the street stone pavement. It is envisaged to continue the implementation of the route “Spiritual Road”, as well as the creation of a route “Temples of Nessebar”.

The medieval churches are located in the traditional outlines of the square spaces. It is forbidden to park motor vehicles within the urban structure of the Ancient city, around part of the medieval churches are installed technical means to prevent motor vehicles from passing by, and with the Ordinance on the terms and conditions for conducting commercial activity outdoors, it is forbidden to place movable objects and facilities around cultural monuments, as well as in front of commercial sites, on the walls and fences of houses. The Municipality of Nessebar informs that these provisions are complied with and preliminary and subsequent control is carried out.

The National Institute for Immovable Cultural Heritage has conducted geodetic and photogrammetric imaging of all medieval churches. Four of them have been restored and socialized (“St. Paraskeva”, “St. Yoan Krastitel”, “St. Yoan Alturgetos”, “St. Stefan”), and for two others (“Christ Pantocrator” and “Saint Archangels Michael and Gabriel”), conservation and restoration projects were prepared, submitted to the FLAG Fund and DZZD “Fund for Sustainable Cities” to provide financing in the form of a financial instrument or a grant under OP “Regions in Growth 2014-2020”.

In 2019, the first stage of replacing the asphalt pavement with stone pavement on parts of streets “Messambria”, “Mitropolitsa” and “Mena” on the territory of the Ancient city was completed.

The second and third stages of the project are in implementation, which include laying of stone pavement along “Ribarska” Str. and the rest of “Mena” Str. as well as the streets “Aheloy”, “Tervel” and “Hemus” (deadline for implementation July 2021)

- **In connection with the recommendations of the advisory mission of 2017 for mapping and monitoring of the decay of historic buildings and their decorative features by conservation specialists, as well as for assessing the state of the urban environment; and of the mission from 2018 for completion of the ongoing inventory of the heritage of the property, the following activities have been performed:**

During the carried out in 2018 by the National Institute for Immovable Cultural Heritage monitoring of all immovable cultural properties on the territory of the Ancient City of Nessebar - archaeological structures: medieval churches; residential buildings, representatives of the “vernacular architecture”, the current state of the sites was investigated, the problems were identified, the factors causing the damage and the speed of their occurrence were taken into account, the urgency of the risk and the necessary measures were determined. Monitoring maps have been prepared, which contain general information about the conducted study and a statement of findings.

The monitoring carried out in 2020 on the state of the urban environment of the Ancient City of Nessebar identifies its condition and degree of conservation in the street and square spaces. The condition of natural stone pavements, asphalt pavements and sidewalk pavements has been established and evaluated. The state of the landscape of the Ancient City of Nessebar - the natural and green areas for widespread public use - has also been established. The monitoring
of the urban environment aims to bring out the recommendations for the restoration of the traditional space on the streets where it is violated and the return of those characteristics that gave the basis for the designation of the “Ancient City of Nessebar” as a bearer of exceptional universal value. A comparative analysis was also carried out between the current state of immovable cultural properties and what was established during the previous monitoring of July 2018, where no changes in their condition were found.

The monitoring report, monitoring maps and map materials (schemes), as well as the identified recovery measures and recommendations, will be included in the Conservation and Management Plan.

Assessed according to certain indicators, taking into account the criteria according to which “The Ancient City of Nessebar” is inscribed in the World Heritage List are: building on the street fronts forming urban silhouettes and perspectives and condition of the street infrastructure of the urban structure. A classification of the authenticity of individual sites and the state of the urban environment is introduced in terms of:

**Authenticity:**
- preserved volume, architectural and artistic elements, details and materials, without extending and upgrading;
- stored volume, with partial loss of details, without or with negligible and removable extending;
- the architectural volume is changed by extending and/or upgrading, with missing or compromised architectural elements and details;
- new, unrecognizable in terms of authentic volume.

**State of conservation of the urban environment:**
- conserved, without new construction;
- partially compromised by construction and temporary facilities, but recoverable;
- severely compromised and difficult to recover;
- completely changed and unrecoverable.

Interventions that significantly change the environment are the result of the strengthening of the slopes due to the danger of landslides, as well as archaeological excavations over time. Projects for the landscaping of slopes are forthcoming with a view to maximizing the return of the visual image of the Ancient city from the sea.

Interventions in the urban environment that adversely affect the Outstanding Universal Value of the Ancient city have been identified, assessed under Criterion (iv) as: “...a unique example of an architectural ensemble with preserved Bulgarian Renaissance structure, and forms a harmonious homogeneous entity with the outstanding natural configuration of the rocky peninsula, linked with the continent by a long narrow stretch of land.”

Based on assessments of the condition and degree of authenticity of the sites and the urban environment, all non-typical interventions violating traditional street silhouettes, including atypical treatments and treatment of the façades of buildings, have been identified. Directions for environmental improvements are defined by: consistent implementation of the policy of eliminating illegal construction of third floors and other types of upgrades; providing visual corridors to the medieval churches; eliminating the commercial sites type “passage” and
secondary sheds, visors, sunshades in front of buildings; reforming the ground and second floors of buildings in the tradition of vernacular architecture, avoiding literal imitation.

**Mapping:**
In 2019 and 2020 NIICH performed field geodetic measurements to complement the previously made street silhouette plans and capture coastal street silhouettes from a drone. Computer processing of geodetic measurements and completion of street silhouette plans on a scale of 1:200 was done. A drone was used to capture the entire territory of the peninsula. As a result, all street silhouette plans have been prepared on the territory of the reserve in digital and graphic form on a scale of 1:200 and street spaces have been documented throughout the territory of the Ancient city.
After computer processing of the aerial photographs, an orthophotoplan, geodetically attached to the cadastral map of the Ancient City of Nessebar was made.

- **On the implementation of the recommendations for: intensifying regulations aimed at the detection of transformations of private houses and of those houses that require restoration; further protection and specific measures for rehabilitation and enhancement of the "traditional architecture" (typical townhouses) as a significant attribute of the property; Introducing an operational legal framework to prevent further inappropriate developments within the peninsula, including urgent measures to halt irreversible transformations of the houses; legal measures for compulsory removal of all inappropriate adjustments to the 19th century houses and restoration of their previous aspect:**

- NIICH monitors the state of the immovable cultural heritage on the territory of Ancient Nessebar and prescribes measures for its protection. Based on the monitoring carried out by the National Institute for Immovable Cultural Heritage (NIICH) in 2018-2020 with documentation of the status of all single cultural properties on the territory of the Ancient City of Nessebar, an assessment of the status of the buildings of the vernacular architecture was carried out according to the following criteria: component status classification, risk urgency classification and general classification - recommended class and measures. The classification of the status is based on an overall assessment of all characteristic symptoms and determines a class of the conservation status of the components after considering the presence and severity of the symptoms of damage. The separation under the above indicator is the basis for assessing the risk and urgency of the necessary measures and interventions. Based on the results of the evaluation, the activities required to undertake on each site are indicated. The conservation regimes regulate the permissible interventions on the monuments and their environment, as well as on buildings that do not possess the status of immovable cultural properties.

The NIICH monitoring report recommends as a useful approach to restoring urban fabric: “the choice of a restricted area in which the consequences of inappropriate interventions should be consistently eliminated and remedied, taking equal account of the public and private interest. As a “pi lot zone” is proposed a section of the territory of the Ancient city with six immovable cultural properties - buildings of vernacular architecture with associated construction.

- The Cultural Heritage Act (CHA) and the Spatial Planning Act (SPA) regulate a coordination and control regime for all development and investment projects in the protected areas of immovable cultural heritage. According to the Cultural Heritage Act, the territorial development protection of immovable cultural heritage covers: Conservation regimes:
Development plans of protected areas of immovable cultural heritage; Conservation and management plans; design, coordination and approval of project documentation and control of their implementation; financing and carrying out activities in immovable cultural properties and their buffer zones for the purposes of their conservation and exposure. Prescriptions for conservation (as part of conservation regimes) are determined on the basis of the results of the preliminary and final assessment, respectively, of the analysis of the impact of interventions carried out and of their degree of threat from anthropogenic and natural geographic factors. The Prescriptions for Conservation to the enacted conservation regimes of the Ancient City of Nessebar define the restrictions, permissible interventions and requirements for conservation activities for all elements of the urban structure. One of the specific prescriptions for the conservation of houses of vernacular architecture - immovable cultural properties - is the restoration of visual authenticity in cases where it is changed as a result of illegal interventions. For properties without the status of immovable cultural properties, investment projects for new construction are required to take into account the nature and manner of construction of the urban structure of the property and the historical context, and the height of the main construction is not to exceed the relative elevation cornice and elevation of any of the nearest and visually perceptible immovable cultural property - representative of the vernacular architecture; the new construction is to be subject to the architecture of the traditional Nessebar residential building: scale, proportions, colour, treatment of façades; wooden window and shop window frames and wooden covers in the ground floor; aggregated lofty roofs with a slope of 1:3 to 1:2.5 with a coating of ceramic one-piece tiles of traditional colour, without skylights.

- When coordinating investment projects for the territory of the Ancient City of Nessebar and its buffer zone, the National Institute of Immovable Cultural Heritage (NIICH) and the Ministry of Culture check the compliance of the proposed interventions with the conservation regimes of the world heritage property in force. Based on the opinions of NIICH, the Ministry of Culture coordinates projects for conservation and restoration of cultural properties, elimination of illegal volumes (mostly extensions and upgrades), restoration of authentic appearance of buildings. There are no inappropriate modifications to the 19th century houses made in coordination with the National Institute of Immovable Cultural Heritage or the Ministry of Culture. In 2019 and 2020, projects for the implementation of restoration and renovation activities for two buildings of vernacular architecture with the status of immovable cultural properties were submitted for an opinion to NIICH and coordination by the Ministry of Culture:

- Visa and conceptual design for restoration and adaptation of building of immovable cultural property “The House of Successors of Kosta Nenov”, phase: conceptual design, part: Architecture - agreed;
- Technical investment project for site: “Reconstruction of roof, overhaul of façade and internal reconstruction of immovable cultural property “House of Ortodoki Kalaforov” and terrace to it, parts: “Architecture” and “Conservation-restoration works” - in a conciliation procedure.

- **Control over the legality of the construction** is carried out by the Regional Directorate for National Construction Control (RDNCC) - Burgas, which annually updates the information and prepares reports on the implementation of the orders for removal of illegal construction works. The Inspectorate for the Protection of Cultural Heritage of the Ministry of Culture exercises control over the compliance with the provisions of the Cultural Heritage Act and the acts issued on the basis thereof. Illegally conducted interventions on 19th century buildings or
modern buildings were established by commissions of NIICH, Nessebar Municipality and RDNCC - Burgas and orders were issued for them to be removed by the Head of the Directorate for National Construction Control. Representatives of the inspectorate shall participate in committees for establishing the status of immovable cultural heritage sites. The Construction Control Department at the Spatial Planning, Investor Control and Construction Control Directorate in the Municipality of Nessebar performs control and finds violations under the Spatial Planning Act and participates in joint inspections with RDNCC - Burgas. The Regional Inspector at the Inspectorate for the Protection of Cultural Heritage carries out inspections on the territory of the Ancient City of Nessebar.

- **The Ordinance on the forced execution of orders for the removal of illegal constructions** or parts thereof by the bodies of the Directorate for National Construction Control, issued by the Minister of Regional Development and Public Works, regulates the terms and procedure for the forced execution of removal orders issued by the head of the DNCC. The head of the DNCC or an official authorised by him/her shall issue orders for the removal of illegal constructions of the first, second and third categories. These categories of construction include immovable cultural properties of global and national importance, as well as buildings within the boundaries and buffer zones of archaeological reserves outside urban areas. 24 of the effective orders for the removal of illegal constructions or parts thereof on the territory of the Ancient City of Nessebar, issued by the Head of the DNCC, are in a procedure for selecting a contractor and setting a date for forced removal. Prior to the removal of illegal parts, the owners of the buildings must have elaborated and coordinated with the Ministry of Culture projects for the necessary subsequent construction to bring the buildings into a form consistent with the conservation regimes, and for the buildings - immovable cultural properties, restoration closest to the original (authentication data restoration) is required. The building permit is issued by the chief architect of the municipality on the basis of a coordinated and approved project, after the removal of illegal parts of the works.

- **The Ordinance on the Forced Execution of Orders for the Elimination of Illegal Constructions from the Fourth to the Sixth Category on the Territory of the Municipality of Nessebar** in force from 08.11.2014, adopted by a decision of the Municipal Council - Nessebar, regulates the terms and procedure for the forced execution of orders of the Mayor of the Municipality for the elimination of illegal constructions or parts thereof on the territory of the Municipality of Nessebar. The fifth category of construction includes immovable cultural properties with categories “ensemble significance” and “for information”. In accordance with this Ordinance, orders for the repair or restoration of illegally removed constructions, parts of them or individual types of construction works shall also be enforced.

In order to eliminate unregulated interventions in the environment, namely illegal upgrading of a building in a private property, a building permit was issued for the reconstruction of a roof of a residential building in SLP IV, q. 28 according to the plan of the city of Nessebar - Ancient city (LP 51500.501.157). The elimination of illegal volumes has taken place.

Another building permit concerning immovable cultural property in a private property was issued for “Reconstruction and restoration of the southern part of ICP “House of Ivan Tyulev” and façade restoration of the entire building” in SLP III, q. 28 according to the plan of the city of the city of Nessebar - Ancient city (LP 51500.501.163). It permits the construction according to
archive data of the demolished part of the Immovable Cultural Property for the purpose of its full restoration.

- A number of regulations have been established to the Cultural Heritage Act, the implementation and observance of which guarantees the effective protection of immovable cultural heritage, including: Ordinance on the scope and content of documentation for carrying out conservation and restoration activities on immovable cultural properties issued by the Ministry of Culture and the Ministry of Regional Development and Public Works, and for all conservation and restoration activities, including for exposure and adaptation of immovable cultural properties, for which coordination of an investment project is required, the requirements for preliminary studies and scope and content of the project documents provided for by this Ordinance shall apply; Ordinance on the conditions and procedure for establishing and maintaining a public register of persons entitled to carry out conservation and restoration activities; Ordinance on the conditions and procedure for presenting cultural properties, which regulates the presentation of cultural properties as a way to ensure their socialization, their integration into the environment and the needs of society in accordance with the principles of conservation, under conditions and in a way that does not endanger their physical integrity, condition and authenticity; Ordinance for conducting field archaeological studies and others.

In view of the above, we find that the cited normative documents, regulations and measures taken guarantee the prevention of further inappropriate development within the peninsula, as well as irreversible reconstruction of houses.

- On the recommendations for: Inventory of all permits issued by the Municipality of Nessebar for all development/infrastructure/urban transformation projects within the property and its setting: Institution of all relevant legal measures for immediate halt of use of all previously issued permits until the cumulative impact of proposed developments, together with Heritage Impact Assessments have been submitted to the World Heritage Centre, in conformity with Paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO, 2017), for review and comments by the Advisory Bodies, before any further irreversible developments occur.

The data on the issued building permits are stored in the Directorate “Spatial Planning, Investor Control and Construction Control” of the Municipality of Nessebar. Given the increased control and the non-admission of illegal construction after 2010, the SPICCC Directorate carried out an inventory and presented data in tabular form for the period from 2011 to 2020 (Annex 9).

According to the data in the table, no building permits for new buildings were issued during that period. The building permits refer to: Conservation and restoration of single immovable cultural properties; Reconstruction, façade reconstruction, removal of illegal volumes in order to restore authentic appearance; Public works and infrastructure.

Building permits are issued in accordance with the Spatial Planning Act after evaluation of all parts of the investment projects that are grounds for issuing a building permit, for their compliance with the basic requirements for the construction works. A building permit of sites in protected areas for the conservation of cultural heritage shall be issued in compliance with the provisions of the Cultural Heritage Act, after approval and prior coordination of the projects with NIICH and the Ministry of Culture. The coordination procedure of projects for the Ancient City of Nessebar monitors their compliance with the defined conservation regimes.
In the event that within one year of the approval of an investment project, the contracting authority does not make a request for obtaining a building permit, the project shall lose legal effect and the procedure shall start again. Refusal to issue a building permit shall be made only by legality, stating the specific reasons therefore. A building permit may be renewed only once, for the renewal of the time limit for the commencement of the construction or for the renewal of the time limit for the completion of the construction.

Within the protected area and the buffer zone of the Ancient City of Nessebar, the requirement for preparation of Heritage Impact Assessments for significant restorations or new investment initiatives applies. After 2010 there is no construction of new buildings on this territory. The impact assessment for the project “Rehabilitation and modernization of the fishing port “Severna Buna -Nessebar” was prepared and sent to the World Heritage Committee. The assessment of the impact of investment intention for new construction for a school, sports hall and exposure of cyst graves in part of the terrain of “Ancient necropolis of Messambria”, falling within the buffer zone of the Ancient City of Nessebar on the continent, is in the process of preparation, after the Scope Report to the Assessment presented in NIICH. Upon completion of the Impact Assessment, it will be submitted to the World Heritage Centre in accordance with Article 172 of the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO, 2017).

* On the recommendation for: Halt all ongoing and new development/construction works and the issuing of construction permits until the urban planning documentation has been adopted on the basis of the national strategy for the protection of the World Heritage property Ancient City of Nessebar, and control and monitoring at the State level is fully in place. Restrict any possible interventions on urban fabric and the peninsula landscape to emergency cases only ..., as well as to the restoration works of the existing buildings and structures that do not cause dissonance and are in line with the historically-established urban environment of Nessebar:

According to the opinion of the Directorate for National Construction Control, this measure could be implemented by imposing a ban on construction for a period of two years in accordance with the Spatial Planning Act by an order of the mayor of Nessebar Municipality until the elaboration and entry into force of a new development plan for Ancient Nessebar. At the same time, it should be borne in mind that since 2010 the Municipality of Nessebar has not issued visas for the design of new buildings on the peninsula, and according to the data provided by the Municipality of Nessebar and the National Institute of Immovable Cultural Heritage, the visas issued and the coordinated and approved projects, respectively the building permits issued, are for: conservation and restoration of medieval churches; reconstruction after removal of illegal parts of residential buildings, as well as for façade reconstruction in order to restore the traditional appearance of buildings; repairs and reconstruction of depreciated roofs; repairs and reconstruction of ground floors in order to change the purpose of commercial functions, in connection with the removal of removable facilities from street and square spaces; elements of technical infrastructure, including for replacement of asphalt with stone pavement and lighting. The implementation of such projects does not impair the development characteristics of the property, but rather contribute to the improvement of the environment.

Since 2010, control of the territory of the world heritage property has been strengthened. The Regional Inspector at the Inspectorate for the Protection of Cultural Heritage carries out
inspections. The Head of the Directorate for National Construction Control has issued orders for the removal of illegal constructions established in previous years (interventions in 19th century houses or modern buildings), the implementation of which is monitored by RDNCC - Burgas, as well as the municipality of Nessebar. Monitoring at national level was carried out by the National Institute for Immovable Cultural Heritage in 2018 and 2020 together with the Inspectorate for Protection of Cultural Heritage. The implementation of the conservation regimes of the Ancient City of Nessebar ensures the prevention of projects that cause dissonance in relation to the historically established urban environment.

According to the information provided by the National Institute for Immovable Cultural Heritage about projects on the territory of the Ancient City of Nessebar and its buffer zone, in the period 2019 to January 2021 a conciliation procedure was conducted for: 2 projects for conservation and restoration works for medieval churches; projects for conservation, restoration, exposure and adaptation of two windmills; 3 projects for restoration of authentic characteristics of buildings - immovable cultural properties; 6 projects for internal reconstruction of buildings without the status of immovable cultural properties, which do not change the external architecture and the integrity of the environment; 1 project for removable object that is outside the street silhouette; project for “Rehabilitation and modernization of fishing port “Severna Buna - Nessebar”; 5 projects for infrastructure interventions - the passage of water mains, power supply, etc.; - 2 projects for refurbishment of buildings that are without the status of ICP.

The following are also agreed:

- Visas for study and design, conservation, restoration, exhibition and socialization of the churches “St. Kliment”, “St. Todor”, “St. Dimitar”, “The Old Mitropoliya”;
- Visa for study and design conservation, restoration, exposure and socialization of immovable cultural property - fortress walls in the western part of the peninsula, city of Nessebar, within the scope of which are located archaeological properties - “Temple of Zeus Hyperdexios”, “Ancient wall of the terrace (Hellenistic era - 3 century BC); “Sector of the Thracian fortification system - defence courtine and city gate (12-6 century BC)”;
- Visa for study and design conservation and restoration of immovable cultural property - “Fountain at the Old Mitropoliya”;
- Visa for study and design conservation, restoration, exhibition and socialization of immovable cultural property “Ethnographic Museum”.

The following text is included in the conservation regimes for the Ancient City of Nessebar (promulgated in SG No. 51 of 07.07.2015): “For projects for significant restoration works or new construction that could affect the exceptional universal value of the property, the World Heritage Committee shall be informed in accordance with the Convention for the Protection of the World Cultural and Natural Heritage, adopted by Order No. 13 of the Bureau of the Council of Ministers of 4.02.1974, promulgated in SG No.4/2005 and in accordance with Art. 172 of the Guidelines for its Application. Projects shall proceed following a decision of the World Heritage Committee.”

- **Implementation of the recommendations for: Organisation of campaigns and meetings to raise awareness of concerns about the heritage in stakeholders, inhabitants and private owners; opportunities for improvement, and promotion of conservation of the townhouses and verifying the possibilities for uses that envisage the presence of the public**
or are compatible with temporary visits; measures for supporting the restoration of
townhouses, including the possibility of providing direct financial support or tax
incentives. Development and implementation of educational programmes with schools for
promoting knowledge and respect for heritage among young people:

- The Law on the Protection of Cultural Heritage regulates the rights of owners of
  immovable cultural property to apply for support under programs financially provided by the
  state budget, municipal budget or other sources for the purpose of carrying out emergency,
  strengthening, conservation and restoration works necessary for the protection of the cultural
  property; to generate income from entrance tickets, advertising materials, as well as from
  reproduction of the cultural property in photographic, computer, video and other image under the
  conditions and in accordance with this Law; to collect and receive voluntary monetary and other
  aid and donations from individuals and institutions, as well as to receive consultation, expert
  advice and recommendations from the competent authorities for the protection of the cultural
  property.

- Owners (including natural persons) of immovable cultural properties - representatives of
  the vernacular architecture, may apply for financial support for the preparation of projects or
  carrying out conservation and restoration activities under the programme “Protection of
  immovable cultural heritage” of the Ministry of Culture according to rules approved by the
  Minister. The rules set out the terms and conditions for applying for financial support through the
  budget of the Ministry of Culture for activities for protection, presentation, conservation and
  restoration of sites with the status of immovable cultural properties, as well as the criteria for
  selection of these sites. Owners, designers and contractors must comply with and apply all the
  requirements of the conservation regimes for the relevant area of the Ancient City of Nessebar.

- According to the Ordinance on determining the amount of local taxes of the municipality
  of Nessebar, in accordance with the Law on Local Taxes and Fees, buildings - immovable
  cultural properties are exempt from tax when not used for business purposes, as well as
  museums, galleries, libraries.

- In 2018-2019 Museum “Ancient Nessebar” prepared and launched educational
  programme “Know Nessebar”. The aim of the program is to familiarize students and children
  from the upper groups of kindergartens from all the constituent settlements of the Municipality
  of Nessebar with the millenial history of Nessebar and to build in them skills for preserving the
  rich cultural and historical heritage of the city. Within this program, in 2018-2020 specialized
  lectures were presented in the Archaeological Museum to children and pupils. Public lectures on
  the topics “Nessebar in the 19th century and the Russo-Turkish Wars” and “Nessebar Revival
  Houses” were also given to students from the upper classes of MSS “Lyuben Karavelov”. The
  lectures “Churches of Nessebar” and “History of underwater exploration in Nessebar” are
  forthcoming.

In April 2019, the “Golden Book of Nessebar” was presented to students by archaeologist
Evtelpa Tseklieva - Stoycheva (History of Nessebar from antiquity to the present day with
collected landmarks from the first archaeological expeditions in the Ancient city);

In May 2019 Museum “Ancient Nessebar” announced a contest for students for a presentation on
“Nessebar in the past and today”. The presentations presented the Ancient city and individual
monuments in it in the past and present, with students from 5th to 12th grade participating. The best presentations are awarded with prizes.

Unfortunately, in 2020, in connection with the complicated epidemiological situation in the country, the program was temporarily frozen, and detailed educational facts from the ancient and recent history of the city are periodically presented on the official website of the Museum. Various options are currently being developed for the initiative to continue online.

In 2020, the Ancient Nessebar Museum won a project to provide grants under the Maritime and Fisheries Programme 2014-2020, measure 2.2 “Support for the creation of new services for the population in the fishing territory” - “Delivery and installation of a multimedia system for the needs of the Ancient Nessebar Museum”, which will contribute on improving the tourist service of visitors to the museum by introducing new interactive methods in presenting the cultural and historical heritage of Nessebar, the history of fisheries in Nessebar and the region and the Western Black Sea region. The project shall be implemented by 25 May 2021.

In August 2019 an exhibition “Nessebar in cartographic archives and collections from the 2nd to the 21st century” was opened. There are 45 images of old and newer maps and engravings stored in the British Library in London, the Library of the Russian Academy of Sciences - St. Petersburg, the Library of the Coret Civil Museum - Venice, the Tommaso Corsini Library - Florence, the Military Archive - Vienna, the State Library of the Prussian Cultural Heritage - Berlin, the State Archives of Venice, the Marciana National Library - Venice, the Saxon Library - Dresden, the French National Library - Paris and seven Bulgarian archives, libraries and private collections:

Annually, together with the Ancient Nessebar Museum, events are organized on September 8th, International Day of Solidarity of the World Cultural Heritage Cities: “European Heritage Days 2020” were held on 19 and 20 September 2020.

An idea for presenting traditional crafts to the younger audience in the yard of the Ethnographic Museum has been developed, but so far it has been frozen.

- The recommendation for approval of regulations and installation of devices that can prevent car traffic and parking in sensitive areas is being implemented: Approve regulations and install devices that can prevent car traffic and parking in sensitive areas:

Every year the Municipal Council of Nessebar Municipality adopts a Traffic Organization and Safety Scheme. For 2019 and 2020 the restrictive regime for motor vehicle traffic in the urbanized territory of Ancient Nessebar has been introduced since April 1. Parking of vehicles within the urban structure of the property is prohibited. Unidirectional traffic is introduced and only cars with a pass are allowed, with two crossing points equipped with automatic barriers driven by programmed magnetic cards are defined. An hourly schedule has been set for supplying the retail outlets. The parking spaces of both buses with tourists and private vehicles (including the inhabitants of the Ancient city) are defined in the areas acquired by the sea. In 2019, technical means were installed to limit the traffic around the medieval churches “St. Todor” and “St. Stefan” and around the Basilica “St. Sofia” (The Old Mitropoliya), which operate year-round.
- The recommendation of the 2018 mission to continue the scientific research of the remains of ancient Messambria and to Intensify the Program of underwater archaeological research is being implemented:

Underwater studies are part of the long-term Programme of the Centre for Underwater Archaeology for Research and Socialization of the Archaeological Cultural Heritage of Ancient Nessebar as a complete part of the common cultural heritage of the property (Annex 10). The early underwater archaeological studies of Nessebar were conducted in the period 1960-1984 (15 expeditions) under the supervision of L. Oggenova. After a 30-year break, in 2015 they were resumed as rescue studies of the Centre for Underwater Archaeology at the Ministry of Culture in connection with the project of the Municipality of Nessebar for modernization and reconstruction of the Northern (Fishing) Port. Since 2017, CUA has conducted regular underwater archaeological studies annually with funding from the Ministry of Culture under the Field Archaeological Studies and Field Conservation Programme. So far, the programme covers the amount requested by the CUA on a yearly basis, which is the maximum according to the programme limit. In 2018 and 2019, the studies were also supported by the Balkan Heritage Foundation.

In the last 2 years the field work has been within:

2019 – 2 months
2020 – 1 month

Achieved results of the biennial studies:

- Parts of the south-eastern peninsula with singlebeam and multibeam echosounder were filmed. Based on the acquired bathymetric data, a high-precision seabed bathymetric model was created with a resolution of 15 cm/pixel. On the bathymetric model are distinguishable some of the fortress and port facilities (2019, 2020).

- The territory and the aquatory of the Nessebar Peninsula was photographed by drone. Based on orthoimages and with additional bathymetric and field geo-reference measurements, a field and bathymetric digital model has been created to a depth of -3 m. Such bathymetric measurement is innovative and pioneering in methodological terms and is among the first such successful trials in marine archaeology (2020).

- Field models created with aerial imaging and photogrammetry and sonar scanning are unified. This is the first time that a complete digital terrain model (DTM) has been obtained on the Nessebar Peninsula and its aquatory up to 20 m deep (2020).

- Based on aerial drone photography, a photogrammetric photomosaic was created with a resolution of 5 cm/pixel. A number of archaeological sites are clearly visible and documented on it. The photomosaic was used and will contribute to the study of the previously unexplored parts of the Nessebar aquatory (2020).

- Unknown and unregistered underwater architectural monuments have been found during diving studies. Among them are parts of early Byzantine walls in the south-eastern aquatory of the city (2019, 2020), well preserved foundation of a wall of plinths (or a site (3 m x 7 m) to the coast south of the Sea Station (2020), parts of a wall of plinths in the south-eastern territory (6 m x 1.8 m), six drums of stone columns, architectural stone details, stone anchor, etc. The site at the Sea Station is the first archaeological monument discovered underwater in the south-western aquatory of the peninsula.
• A study (2019, 2020) of massive stone structures - breakwaters, identified during diving inspections already in 2017 and 2018 in the south-eastern aquatory of the peninsula, was carried out. L-shaped breakwater with a length of 50 m x 45 m, a width of 12 m and a height of 3 m and a linear breakwater with a length of about 80 m, a width of up to 11 m and a height of about 2 m. During their investigation dated materials used in their construction were found - drums of columns, plinths with races, stone with mortar, etc. The breakwaters are documented by multi-beam echosounder capture and underwater photogrammetry (probably one of the largest underwater archaeological structures documented photogrammetrically in marine archaeology). Digital terrain models and high-resolution photomosaics have been created - below 5 cm/pixel of the two facilities. At the north-western aquatory of the city was discovered a third breakwater made of stones, some of impressive size, which is to be explored and documented in the upcoming field seasons. These are the first port facilities found so far at Nessebar. Currently they are also the largest archaeological monuments (structures) under water found in the Black Sea. They're visible in satellite photos and aerial photographs.

• Underwater exploration continued with archaeological excavations of several underwater structures:

- The trench (2019) was extended at the early Byzantine wall in opus mixtum, in the north-western aquatory of the peninsula, whose studies began in 2018. The reached depth is from -2 to -2.6 m, and the ancient terrain has not been reached. Multiple fragments of the fortress wall were found in depth. Next to these remains is the breakwater of large stone blocks mentioned above. This area is one of the most promising for future archaeological studies, which will continue in 2021 and 2022.

- An archaeological trench was made at the Byzantine wall west of the South Buna (2019). At its base was discovered a system of pilots (wooden stakes) strengthening the clay terrain. Pilots and respectively the wall are to be sampled and dated.

- Archaeological excavations have been made on the tower and the adjacent wall west of it, in the south-western aquatory of the peninsula, east of the South Buna (2019). An extension of the tower was discovered, making its size 8 x 8 m. The dimensions of the wall west of it have been established, its width is 3.9 m and the length - about 20 m.

- An archaeological drilling was done on the wall of large plinths at a depth of -4.5 m (2019, 2020). The base of the wall was reached at 4.7 m. Cross wooden beams were found between the blocks in the first row. They were sampled for carbon dating (C14), which will be done in 2021. Ancient terrain marked by a large amount of building ceramics - corinthian-type roof tiles was discovered.

- A drilling was done in the area of the so-called by L. Ognenova “Thracian Wall” or “Rainbow Wall” (2020), which was not found in the searches in 2017-2019. According to her, this is the oldest and deepest structure, which dates back to the first half of the first millennium BC. Drilling at depths of -4.3 m to -5.7 m did not reveal parts of the wall, but numerous large plinths were found to confirm the information from L. Ognenova and turn this area into one of the most promising and important for the upcoming studies in 2021 and 2022.

• High-resolution photogrammetric imaging of the studied structures was done, making three-dimensional models and high-resolution photomosaics (less than 5 cm/pixel).

Programme for the upcoming marine archaeological studies (2021-2025):
• Underwater archaeological studies provide for the operation of the following sites:
  - Excavations of the region of “Thracian Wall”;
  - Excavations at the North Buna, on the early Byzantine walls and the breakwater;
  - Excavations in the area of the early Byzantine walls in the bay west of the Southern Buna;
  - Extending the scope of marine geophysical studies;
  - Divers’ sightings in unexplored parts of the aquatory of the peninsula;
  - Upgrading the GIS database, including archival materials, 3D models, photogrammetric
    mosaics, aerophotographs, satellite imagery, etc.

Based on the results of the underwater studies, a procedure for changing the boundaries of the
archaeological reserve (2022) will be initiated and the information for exploration, conservation
and communication of underwater and marine cultural heritage in the draft Management and
Conservation Plan of the Ancient City of Nessebar (until its adoption) will be regularly updated.
Funding for regular archaeological studies and additional work in connection with the updating
of the Plan will be provided by the Ministry of Culture under the Programme for Financing of
Field Studies and Field Conservation and under the Program for Conservation of Inmovable
Cultural Heritage. Additional targeted funding may also be made available where necessary.

• Rescue archaeological studies:
  - In 2021, a preliminary rescue archaeological study will be carried out in the area of the
  North Harbour in connection with the anchoring of the floating caissons, with which the
current jetty will be extended. The CUA will carry out preliminary archaeological
  drilling to prevent possible violation of cultural monuments underwater when anchoring.
  - In 2021 the CUA will carry out monitoring and control in the implementation of the
  project for rehabilitation and modernization of the North (Fishing) port and anchoring of
  floating caissons.

Funding for rescue archaeological study will be provided by the Municipality of Nessebar.

  - In 2020, orthophoto imaging carried out by the CUA revealed serious contamination
with waste in the territory as a result of port activity. The main affected area is at the North
Harbor. In connection with this problem, CUA assists the Municipality of Nessebar in the
preparation of a project proposal for cleaning the harbour area: “Reduction of waste in the
territory of the city of Nessebar through cleaning actions and awareness campaigns for the
local population: conservation of marine natural and cultural heritage as a public
responsibility and resource for local traditional livelihoods”¹. The project was highly evaluated
and received funding from the Ministry of Environment and Water under the “Small Grant
Scheme for Measures to Reduce Marine Waste” under Outcome 2: “A system for the
assessment, monitoring and management of marine waters. The project will be implemented in
2021 and the cleaning will be carried out under archaeological monitoring. The project
envisages campaigning among local people, mainly fishermen, in order to familiarize them with
the underwater cultural and natural heritage and its importance as a historical testimony and
resource for local sustainable development.

• In implementation are the recommendations of the missions from 2017 and 2018
for particular attention to the decorative features of the churches so that vulnerable elements, such as the ship graffiti, are conserved as significant attributes that convey OUV: Finalization of the research on ship graffiti and a launch of a program for protection, conservation and communication of this heritage:

Over 300 single or group graffiti of ships are preserved in four medieval and post-medieval churches in Nessebar - “St. Spas”, “St. Todor”, “St. Stefan” (The New Mitropoliya) and “St. Yoan Aliturgetos. Graffiti is an important source for shipping and shipbuilding on the Western Black Sea coast, for the world outlook, beliefs and traditions of the local population. Apart from the ships in the churches were carved individual graffiti of animals, people and hundreds with personal names and years. Currently, these monuments are only partially published in articles of a scientific nature and remain unknown and invisible to society and cultural audiences. (Annex II)

Since 2018, a program has been launched to study, document and present graffiti from Nessebar churches according to modern standards and technical capabilities. It includes the Centre for Underwater Archaeology, Archaeological Museum - Nessebar and Balkan Heritage Foundation (BHF). The program is supported by the Ministry of Culture and the BHF. In 2018, graffiti from the churches “St. Spas” and “St. Todor” were documented. In 2019 and 2020, fieldwork continued in the churches “St. Stefan” (The New Mitropoliya) and “St. Yoan Aliturgetos. The field work was attended by Bulgarian and foreign specialists in the field of cultural heritage documentation. During both seasons, all graffiti from both churches were documented. Modern methods of documentation and research were applied: Reflectance Transformation Imaging (RTI), Close-range Photogrammetry and Gigapixel panorama photography. RTI and photogrammetric models of graffiti have been created. This concludes the field work on documenting the monuments. Currently the preparation of their publication in catalogues (corpus of graffiti from Nessebar) is ongoing, which will be published electronically and will be publicly available.

- In 2021, the study will continue with photogrammetric and laser scanning of churches with graffiti, making three-dimensional models and creating virtual realities (tours) of churches with high resolution and incorporating graffiti, which will be viewable in detail by visitors. For the financing of the field work Archaeological Museum Nessebar will again submit a project under the Program for financing of field studies and field conservation at the Ministry of Culture.

- Results of the studies in 2019 and 2020 are published in a number of articles in Bulgarian and English language.

- On recommendation: “Development and adaptation a plan for the rehabilitation of the mainland waterfront, in order to avoid new massive developments that could impact negatively on the landscape and the creation of an adequate access to the ancient city”:

Along the coastline of continent, in the buffer zone, there’s no mass construction. A pedestrian promenade has been built along the northern coastline from the isthmus to the beginning of the north beach. Along the coastline is the alley connecting the Old and New Town with the resort complex “Sunny Beach” and which enjoys an attractive tourist train and cyclists. The area from the alley to “Khan Krum” Str. includes land properties provided by the municipality for “coastal park with public service, pumping station, transformer station and landscaping”. The project was reviewed by the National Institute for Immovable Cultural Heritage and returned to the
Municipality of Nessebar for processing with a number of requirements in accordance with the conservation regimes. There is no subsequent request from the municipality for the implementation of this project.

The pedestrian alley continues along the southern coastline, ahead of it is the realized yacht port, small properties for its servicing and a large property for the seaside park. The South Park is situated between the southern coastline and “Morska” Street.

Specific forecasts for the structure of the buffer zone of the continent will be developed to the Detailed Development Plan for the Ancient City of Nessebar, taking into account the conservation regimes.

- **On recommendation**: “Develop and implement appropriate measures, including facilities for renting/purchasing atelier-spaces and declaration of provenance, to support local craftsmen and traditional manufacturing”:

In the southern part of the peninsula lies the so-called “Crafts Street”. The purpose of the sites is to rent studio spaces, to develop and support local craftsmen. At the moment, there are not many who wish to rent these spaces. The Action Plan for the realization of the Sustainable Tourism Development Programme 2018- 2024 provides in the spaces around medieval churches to be held demonstrations of crafts, arranging mosaics and decorative panels, making graffiti in original medieval equipment, selling traditional souvenirs. The Municipality of Nessebar plans to implement these initiatives during the tourist season 2021.

The non-governmental organization "Association of Craftsmen and Artists in the Municipality of Nessebar" is involved in the life of Nessebar with its own events and initiatives. Among the goals of the association are: supporting the study and popularization of Bulgarian crafts and art; stimulating the development of crafts by providing conditions for the development of entrepreneurship; protection of the interests of craftsmen and protection of consumers of craft services; supporting and developing vocational education in the field of crafts and arts; popularizing the work of the artist and craftsman among the general public.

8. **Also urges the State Party to continue to undertake research in anticipation of a future minor boundary modification request in accordance with Paragraphs 163 and 164 of the Operational Guidelines to include all underwater archaeological remains of the ancient town:**

Recommendations of the 26 November - 3 December 2017 ICOMOS Advisory Mission and Scientific and Technical Advisory Body (STAB) to the UNESCO Convention on the Protection of Underwater Cultural Heritage: “Nessebar's underwater cultural heritage must be taken into account in all areas of management and planning as an important feature of the OUV.”

“... the State Party and its competent authorities shall: consider a proposal to modify the boundaries to include underwater cultural heritage within the World Heritage Site buffer zone, as this is an attribute of the OUV.”

A recommendation for the inclusion of underwater archaeological structures within the boundaries of the world heritage property was also made by the ICOMOS advisory mission held in 2015: “In view of the threats and despite pressure to reduce the protected areas, the
One of the objectives of the regular underwater archaeological studies conducted by the Centre for Underwater Archaeology in the Nessebar Peninsula during the last 4 years (2017-2020) is to establish the real scale of the submerged cultural heritage underwater and to prepare a scientifically substantiated opinion on the necessary modification of the boundaries of the property. Currently, the identification of underwater cultural monuments shows that archaeological structures in situ have been found at a distance of up to about 170 m from the modern coast and at a depth of up to about 5-6 m (in the south-eastern aquatory of the peninsula). These are mainly parts of the city's fortification and port system. They form an integral part of the property and should be included at its boundaries and not in the buffer zone (zone C) as it is now. Planned archaeological excavations in 2021 will provide additional information on the maximum depth and horizontal scales of sunken elements of the world heritage property. The expectations of the CUA are that at the end of 2021 or in 2022 there will be sufficient empirical information to justify and the necessary scientific arguments for launching the procedure for changing the boundaries of the archaeological reserve. At present the position of the CUA is that there are grounds to extend the boundary of the property to the seventh isobathic line (at least in some sections of the aquatory), which probably outlines the widest boundaries (coastline) of the ancient peninsula.

It should be noted that in relation to the underwater heritage of Nessebar, although it falls within the buffer zone “C”, the same conservation and prevention measures apply as for sites on land within the archaeological reserve.

9. **Strongly recommend the State Party to invite an ICOMOS Advisory mission to the property to provide advice in relation to:**

   a. **The further development of the sustainable tourism plan for the property.**
   
   b. **The conservation of the property as a living urban landscape:**

Due to the severe epidemiological situation, in 2020 it was not possible to organize an advisory mission on the territory of the Ancient City of Nessebar. At the same time, the sophisticated technological capabilities for online meetings, trainings and conferences, and the experience we have all gained over the past year, enable such events to be organized and held online. Therefore, in implementation of the recommendation of the World Heritage Committee, as well as in view of the 10-year anniversary of the Recommendation on the Historic Urban Landscape of UNESCO (2011) and the 20th anniversary of the initiation of the thematic programme “World Heritage Cities” (2001), the Ministry of Culture of the Republic of Bulgaria, together with the Municipality of Nessebar, declares its willingness to carry out two advisory missions within 2021:

1. **online advisory mission** - Following the recommendation of the World Heritage Committee to invite ICOMOS to conduct an advisory mission with regard to:
   
   a) Further development of the sustainable tourism plan for the property
   
   b) Preservation of the property as a living urban landscape.

2. **on-line advisory mission/workshop** - to provide expert assistance for the establishment of the first Common Conservation Plan for Cultural and Underwater Heritage. The mission will be a continuation of the mission launched in 2017 for joint work on the Convention for
the Protection of World Heritage and the Convention for the Protection of Underwater Cultural Heritage. Since there is no form of “conservation plan” in the national legislation, but the Ordinance on Plans for the Conservation and Management of Immovable Cultural Properties deals with the sections “conservation” and “management”, the “conservation plan” itself, given the current regulations, should be completed as part of the CMP. The preparation of a Conservation Plan was made a requirement in the decisions of the sessions of the World Heritage Committee from 2017 and 2019.

In view of the above, the Bulgarian side expresses its readiness to extend an official invitation to ICOMOS and the Advisory Scientific and Technical Council to the Convention for the Protection of the Underwater Cultural Heritage (STAB) to conduct advisory missions at a time appropriate for their experts.

III. In conformity with Paragraph 172 of the Operational Guidelines, and in connection with the remark of the Reactive Monitoring Committee of 2018 that “new projects shall be developed on archaeological heritage sites (school complex and sports centre shall be built on the matterica necropolis),” we provide information on the draft Detailed Land Property Plan in the restricted area of the Ancient City of Nessebar:

With the report of 1.12.2018, the Bulgarian side provided information about the Detailed Development Plan Project - a plan for regulation and construction and a Development Plan for regulated land properties SLP I and SLP X, q. 54, which are located in the buffer zone of the Ancient City of Nessebar, on land opposite the peninsula, in the area of the Ancient Necropolis of Messambria (but are not at the base of the isthmus, as written in the mission report of 2018) and are not on the coastline. The proposal is for the establishment of SLP I - for school, sports hall, underground parking lot, landscaping, exhibition and archaeology and SLP X - for tourist info centre, church, chapel, statue, landscaping, archaeology and exhibition. Exposure of archaeological remains is envisaged in both properties. In both properties were carried out rescue archaeological studies (uncovered cyst graves), the result of which were adopted by a commission appointed by the Minister of Culture under the Cultural Heritage Act. The World Heritage Centre/ICOMOS Joint Reactive Monitoring Mission, carried out between 22 and 26 October 2018, following the on-site visit and familiarisation with the project, was expected to give an opinion on whether an impact assessment was necessary. Representatives of the Ancient Nessebar Museum, General Directorate “Inspectorate for Protection of Cultural Heritage” and NIHIC acquainted the experts with the completed field archaeological surveys of this part of the Necropolis of Messambria/Messemvria, explaining that such studies lead to a sterile layer, therefore it is not possible to reveal more archaeological remains within the scope of the considered properties. All findings from the necropolis research represent movable cultural properties and are included in the Inventory Book of the Ancient Nessebar Museum as part of them are exhibited in the permanent exposition of the Archaeological Museum - Hydria, terracotta, vessels and gold objects. According to the prescriptions for conservation (an integral part of the conservation regimes for the Ancient City of Nessebar), for the part of the new town west of the isthmus (continent) is determined: “… reduced construction is permissible - terraced on the natural relief (with above-ground floors of 2 to 4 floors), which will preserve the visual
connection between the continent and the peninsula and make the transition to the realized massive construction...”.

The projects for SLP I and SLP X, q. 54 in the buffer zone of the Ancient City of Nessebar, in the area of the Ancient necropolis of Messambria, have not been coordinated by the Ministry of Culture.

Under the assignment of Nessebar Municipality, a “Scope Report to the Heritage Impact Assessment” in connection with the investment intention of new construction for a school, sports hall and exposure of cyst graves in part of the terrain of the “Ancient necropolis of Messambria”, falling within the buffer zone of the Ancient City of Nessebar was prepared. The report accurately shows the value of the necropolis and the archaeological finds in connection with the Retrospective Declaration of the Outstanding Universal Value of the Ancient City of Nessebar and in connection with the established most important cultural layers of the cultural heritage of the city. The report requires that potential impacts be examined and analysed in detail in the preparation of the impact assessment and that negative impacts are assessed and mitigation measures are envisaged. The assessment of the impact of investment intention for new construction for school, sports hall and exposure of cyst graves in part of the terrain of “Ancient necropolis of Messambria” is in the process of preparation after the Scope Report to the Assessment presented in NIICH. Upon completion of the Impact Assessment, it will be submitted to the World Heritage Centre in accordance with Article 172 of the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO, 2017).

- Public access to the state of conservation report

The Bulgarian side agrees to publish this report for public access in the Information System of the World Heritage Centre (http://whc.unesco.org/en/soc)

BOIL BANOVA

Minister of Culture of the Republic of Bulgaria