ANALYSIS AND RESPONSE TO THE RECOMMENDATIONS FROM THE REPORT ON THE ADVISORY MISSION TO THE WORLD HERITAGE PROPERTY “Natural and Cultural Heritage of the Ohrid region” Republic of Macedonia
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1. **BASIC INFORMATION ON THE PROTECTED PROPERTY**

Ohrid Region spreads on the shores of the fascinating Lake Ohrid. Galichica, with its peak Magaro (2275m) is the central mountain within the region, while Jablanica Mountain represents its western border with several peaks above 2000m, which additionally shape the pristine beauty of the region.

Lake Ohrid, with its origin, age, morphological features and the oligothrophy of its water i.e. the scarceness with organic matter, represents an authentic museum of living endemic and relict species of flora and fauna. Possessing all these features, and because it is the last remnant of the old aquatic world on Euro-Asian lands, its significance for global science is exceptional. It forms a geological unit with Great and Small Prespa (Greece).

The historical monumental unit of the town of Ohrid, as a centre of the region, than the town of Struga, located at 17km to the west of Ohrid along Crn Drim River, that flows out of the lake, the several fishermen’s settlements on the shore, as well as the great number of archaeological sites and Christian spiritual centres, make the Ohrid Region, a unique and marvellous blend of geographic phenomena and human action.

The town of Ohrid is a rare architectural and artistic achievement and a rich treasury of architectural, archaeological, material and intangible treasures, featuring an immense concentration of significant monuments. The old urban nucleus of Ohrid represents a complex monumental unit, whose formation, according to confirmed artefacts and preserved buildings, was continuous from prehistoric times, though Antiquity and Late Antiquity, Early Christianity, Early and High Middle Ages, the Ottoman period until today, i.e. the period between the 4th century BC and the 21st century. The town, formed within a characteristic natural, geographic, historical, ethno-social and aesthetic living and economic conditions, even though without urban planners and architects, had developed into a unique harmony, without noticeable tendencies for usurpation of spaces and vistas.

2. **HISTORY AND DESCRIPTION OF THE SITE OF PLAOSHNIK**

The protected site of Plaoshnik, a micro-location within the WHS, is located on a flattened, almost circular terrace on the south side of the western hill of the town of Ohrid, located between the citadel of the Ohrid (Samuel’s) fortress to the north and the Byzantine church of St. John the Theologian – Kaneo at south-west. The site covers an area of 35,000 m², out of which 31,000 m² are inscribed as a parcel with permitted construction interventions. The site that has been extensively researched (excavated) in the past 13 years, does not feature any contemporary residential buildings, although it is surrounded at its eastern periphery as well as
its northern side with numerous micro-residential buildings. St. Clement’s church (St. Clement and St. Pantelimon) is in its central part, while the türbe of Sinan Çelebi is located in the north-western part.

In a wider cultural-historical-urban context, Plaoshnik represents the westernmost point of the old urban nucleus of the town of Ohrid. In the older literature and oral tradition, it is known also as Imaret, because the remains of the Sultan Mehmed Mosque can be found on the flattened plateau of Plaoshnik.

The entire area has a special cultural, historical, spiritual and religious significance for the town, the Republic of Macedonia and the wider region. The fact that it was the seat of the Ohrid Literary School from the 9th and the 10th century, is an attribute which confers the Ohrid region its outstanding universal value and it features a scientific and educational value. As an archaeological site, Plaoshnik is one of the many values of the Ohrid region that significantly contributes to its outstanding universal value.

2.1 Cultural and natural surroundings of the site

Hidden behind the western terraced isohypsic ridge that defines the borders of the old town, Plaoshnik is located at 760 m above sea level and is not a dominant element in the context of the central urban nucleus. It is visually fully apparent only if it is approached from its north-eastern side or from Lake Ohrid (its southern and south-western side). The rocky shore that descents steeply towards the lake, preserved in its pristine beauty, is enriched by the anglers’ settlement of Kaneo above which rises the church of St. John the Theologian – Kaneo with its perfect proportions that are ideally embedded into the natural ambient. This cultural landscape is located at the lowermost point of the south-western side of the hill where Plaoshnik is positioned, at an elevation of 705 m.

The eastern side of the site is separated from the highest urban zone of the old urban nucleus by a small green strip. This part consists of new residential buildings that follow the cascade structure of the town nucleus, which prevents the visual line to and from Plaoshnik from the eastern side.

On the western and north-western side of the site there is a cascade area of pine forest whose highest point (795 m) represents the Ohrid (Samuel’s) Fortress. On its south-western side, the fortress is the northern most point of the entire cultural landscape of the old urban nucleus of Ohrid. The builders of the old urban nucleus of Ohrid showed remarkable ability to adapt the structures to the natural environment by developing the town on the two hills with steep descent thus giving it an amphitheatre shape with green areas, enabling spectacular views to and from the lake. In such specific ambiance, at the highest part of the hill, rises the Citadel of Samuel’s fortress, which with its partially preserved perimeter walls encircles the old urban nucleus at a the length of 3.000 m.
The horizontal heights difference between the locations of Plaoshnik and the church of St. John the Theologian – Kaneo is 55 m. Because of the configuration of the hilly terrain, the pine forest and the divergent horizontal directions of the buildings, these two locations are not within each other’s line of site, with the exception of them being viewed from a very distant aerial south-western point. Samuel’s fortress with its dominance on the hill is located 45 meters higher than Plaoshnik. Because of the configuration of the terrain, the panoramic view to Plaoshnik from the north is limited only to the southern and south-eastern walls of the citadel.

Plaoshnik can be accessed from many sides but the main one is the north-eastern communication – the road connection with the old urban nucleus. Apart from that, the site is accessible from the existing entrance gate to the east. Recently, several trails for tourists have been made to the western side of the site, connecting it through the pine forest with Samuel’s fortress, as well as terraced trails that enable vertical communication between St. John Kaneo and Plaoshnik.

**2.2 Spiritual and historical-educational values of the site and its significance**

In the spring of 886, St. Clement of Ohrid arrived in Macedonia, settling on the shore of Lake Ohrid after his strenuous journey from Byzantium, Great Moravia, Venice and Rome. His future educational mission in Ohrid and at Plaoshnik had an exceptional influence and significance for the advancement of literacy among the Slavic peoples.

Plaoshnik was respected sacred space since Antiquity. During the Early Christian period a large polyconch church was constructed along with a five-naval basilica, two baptisteries (discovered recently) with mosaic decoration and numerous sculptural fragments.

They are echoing the first Christian mission of St. Erasmus (+303), who, during his travel from Antioch to the Apennine peninsula brought the teachings of Christ to the ancient Lychnidos.

St. Clement had renewed the small ancient tri-conch church that became an important cultural and literary flash point. Around 3500 students – future monks, writers, translators, missionaries and church personas of all levels of the hierarchy and in various spiritual and scientific fields, were educated. At one point, the church functioned as an Archbishops’ cathedral.

Inside St. Clement’s church were kept the oldest translations of the Bible and the church-service books in old Slavonic language created by the Holy Cyril and Methodius based on the South-Slavic dialects. In this temple St. Clement wrote his preaching, lives of saints and poems, giving him a special place in the pantheon of Slavic culture and education. In the oldest era, the Glagolitic alphabet was the one in use, later (with the 11th century reform) substituted by the Cyrillic. The creation of the Slavic alphabet and literary language created opportunities for the
Slavic world to have access to the world cultural treasury. The cultural and educational heritage of Plaoshnik reached Kievan Rus and the Volga, the Black Sea and the Danubian lands.

After his death in 916, Clement was buried in his church at Plaoshnik, and was proclaimed as a saint. The circle of his disciples wrote his Service and his Feast Day was connected with the consecration of his monastery church – St. Pantelimon (when this holly doctor is celebrated – on the 9th of August). His cult can be followed in the medieval art of many countries of South-East Europe, from Thessalonica to Athos, from the Danube to the Adriatic Sea.

The Macedonian Orthodox Church reveres Saint Clement as its founder, symbol of the cultural and spiritual continuity, patriarch of the Slavic literacy and essential part of the great cultural currents of Europe.

The archaeological excavations pinpointed the place of his burial site and consequently (on the occasion of 2000th jubilee of Christianity) the Macedonian Orthodox Church brought back his remains to its original resting place from 916.

Today, Plaoshnik is a place of active church service that limits its commercialization and tourist exploitation even though it represents one of the most visited sites in the country.

2.3 Concept idea for instauration of St. Clement’s university

The idea for the instauration of the historical and literary centre of St. Clement at Plaoshnik in Ohrid originates from the early 1970’s and was initiated by the late member of the Academy of Arts and Sciences Haralampie Polenaković – a distinguished Slavist and linguist. The first concrete preparations for the planning of the instauration of St. Clement’s university began immediately after the instauration of the church of St. Clement and St. Pantelimon with the recommendation of the Board for the instauration of the church that had recommended continuation of the archaeological research, conservation and presentation of the remains near the church (for the parts that are confirmed to be parts of St. Clement’s monastery complex). Based on the information received from the archaeological excavations between 2003 and 2006, the concrete activities for instauration of St. Clement’s University at Plaoshnik had commenced. For that purpose, a Board for instauration of St. Clement’s University at Plaoshnik in Ohrid was established with a goal to prepare a project program.

According to the preamble of the Project programme, the shape of the idea for the instauration of St. Clement’s University is based on the intent to transpose and continue the spiritual and cultural values of the medieval educational activity of St. Clement and his monastic school to contemporary times. It is expected that the revitalization of the spiritual values of Plaoshnik through its new cultural-scientific and religions content will revive and continue the deep humanistic value of the cradle of Slavic literacy, science and Christian spirituality.
The re-creation of Plaoshnik as *genius loci* is planned to take place by the instauration of its old functions and adding new ones that according to the intent of the Project program should become future heritage that will be a source for cultural and religious identity, creativity and diversity.

At the beginning of 2007, the Cultural Heritage Protection Office, a body within the Ministry of Culture of the Republic of Macedonia, had prepared a plan of activities for instigating a motion for the instauration of the St Clement’s University at Plaoshnik. The plan for the completion of the entire project undertook several delays due to the large-scale archaeological excavations that took place on the entire area of the site and which significantly influenced the defining of the micro-locations for development. Based on a previously published public competition, the best Concept design for Instauration of St.Clement’s University in Ohrid was selected. A building permit was secured for the Executive project that had been prepared based on the Concept design.

### 3.0 BACKGROUND TO THE MISSION

#### 3.1 Examination of the State of Conservation by the World Heritage Committee and its Bureau

The State of Conservation of the property was last examined in 1998. A joint UNESCO-ICOMOS-IUCN monitoring mission was carried out in September 1998 for the first time since the inscription of the property on the World Heritage List. The mission report drew particular attention to the fact that at the time of inscription of this mixed property on the List, the well preserved old towns of Ohrid and Struga were set in an almost untouched natural environment on the shores of the Lake. As to cultural heritage, only specifically listed monuments were inscribed on the World Heritage List. These monuments were very well preserved. The natural heritage includes part of the Lake, which is territory of the country (and excludes the part on the territory of Albania) and part of the Galichica National Park. At the time, the mission noted the enormous increase in constructions and settlement activities that had seriously altered the original balance in the region; for example, the town of Struga had incorporated ten new sub-communities.

The mission observed that the authorities had undertaken great efforts for the preservation of the natural and cultural heritage of the property. However, economic and demographic developments pose threats to the values of the site that can only be addressed through an integrated approach and protective measures that link the cultural and the natural heritage preservation. The mission report includes a set of recommendations calling for a special legal framework for the World Heritage site (integrating culture and nature), the strengthening of the management, and the preparation of Spatial Plan for the area and the towns, and the extension of the site to include the whole of the Galichica National Park. The Bureau took note of the report of the joint UNESCO-IUCN-ICOMOS mission to the mixed World Heritage property. It commended the Government of the country for the efforts taken for the preservation of the monuments and environment of the Ohrid Region. It recommended the Government to
consider the recommendations of the mission carefully, particularly with regard to integrated planning and legal protection of the natural and cultural heritage. It also requested the authorities to review the definition of the cultural heritage, to define and propose revised boundaries, if appropriate, and to establish adequate buffer zones. It requested the Government to provide a response to the report by 15 April 1999, for consideration by the Bureau at its twenty-third session (Decision 22 COM VII.30).

At its 33rd session (Seville, 2009), the World Heritage Committee approved the request for a minor boundary modification for the property. It encouraged the States Parties of the former Yugoslav Republic of Macedonia and Albania to cooperate towards the preparation of a new nomination for a transboundary extension of the property to include the Albanian part of Lake Ohrid and its watershed, in order to strengthen the values and integrity of the property. It considered that the transboundary nomination should be for a mixed property and urged for the consideration of the cultural aspects of the Albanian lakeshore (Decision 33 COM 8B.40).

### 3.2 JUSTIFICATION OF THE MISSION

Following the evaluation by ICOMOS of the project “Instauration of St Clements University in Plaoshnik” located within the boundaries of the World Heritage property “Natural and Cultural Heritage of the Ohrid region” (the former Yugoslav Republic of Macedonia), which was considered to have a negative impact on the Outstanding Universal Value of the World Heritage property, the State Party invited an ICOMOS/UNESCO Advisory mission to consider the project on site and to assess the overall state of conservation of the property.

Taking into consideration the Operational Guidelines for the Implementation of the World Heritage Convention, the Mission that took place from 10 to 12 December 2013 in particular:

1. Considered the project “Instauration of St Clements University in Plaoshnik” on site in relation to the Outstanding Universal Value of the World Heritage property;

2. In line with paragraph 172 of the Operational Guidelines, assessed any other relevant conservation projects and issues that may negatively impact on the Outstanding Universal Value of the property, including the conditions of authenticity, integrity and protection and management.

Concerning the main objectives of the mission, the mission:

1. Considered the building plans of the project “Instauration of St Clements University in Plaoshnik” in relation to the Outstanding Universal Value of the World Heritage property;

   - Collected information concerning the building plans;
   - Met the responsible authorities to discuss proposed building plans;
   - Provided recommendations how to integrate the requirements for the protection of the Outstanding Universal Value within the building plans.
2. Provided technical advice to the local and national authorities to find appropriate solutions and to mitigate any potential negative impact on to the Outstanding Universal Value of the World Heritage property.

3. Assessed any other relevant conservation issues that may negatively impact on the Outstanding Universal Value of the property, including the conditions of authenticity, integrity and protection and management, in particular:

- a project proposal from the international company “Sahara India Pariwar” for a coastal development for the economic and tourist development of the Lake Ohrid region,

- the Pan European Corridor VIII project which is planned to pass through the territory of the World Heritage site,

- reconstruction of the existing and construction of new ports,

- construction of hydrodrome on the shore of the Lake for panoramic touristic flights by hydroplane.

- plans for construction of monumental buildings in the central part of the city of Ohrid.

4.0 ASSESSMENT OF THE STATE OF CONSERVATION OF THE SITE

The mission noted that the cultural values of the property are basically embodied in the Historic City of Ohrid but also in elements of the region of Ohrid. Uncontrolled interventions and development, as well as extensive reconstruction have eroded the conditions of authenticity and integrity, but still not to a degree where they have been fully compromised. Given the sensitivity of the remains and the need to maintain the important visual qualities that still exist, it is crucial that management arrangements become fully operational as soon as possible. Conservation policies also need to be enforced so that inadequate developments are effectively controlled to sustain the Outstanding Universal Value of the property.

In regard to the natural criteria, Ohrid Lake and Galichica National Park contain the main attributes that embody natural criteria. Some aspects of the current conditions and potential ecological impacts have been mentioned. The mission considers that these need to be thoroughly addressed by effective management arrangements and through bi-national cooperation. In this respect, seeking a transboundary extension will be a crucial measure to ensure the long-term conservation and protection of the property.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The mission assessed the overall state of conservation of the World Heritage property: “Natural and Cultural Heritage of the Ohrid region”, inscribed on the World Heritage List under natural criteria (iii), which is nowadays the criteria (vii); and extended in 1980 to include the cultural and historical area under cultural criteria (i), (iii) and (iv). The mission noted that the
cultural values of the property are basically embodied in the Historic City of Ohrid but also in elements of the region of Ohrid. Uncontrolled interventions and development, as well as extensive reconstructions, have eroded the conditions of authenticity and integrity, but still not to a degree where they have been fully compromised.

Development pressure, direct and indirect impacts on visual integrity, as well as the densification and modernization of historic fabric have been identified as the key factors impacting on the property’s authenticity and on the visual qualities.

The on-going construction work being carried out within the framework of the project “Creation of St.Clement’s University in Plaoshnik” has already a negative impact on the visual qualities of the property and on its conditions of integrity. Therefore the mission experts considered that the whole project has to be considerably revised following the detailed recommendations given below. The current situation is an urgent matter and needs immediate attention so that the Outstanding Universal Value of the property is not further compromised.

Other development projects discussed during the mission are in the phase of preparation, but at a different level. The detailed programmes for their implementation have not been made available during the mission, and therefore the mission team underlined the importance to conduct both Environmental and Heritage Impact Assessments, which are to be submitted for evaluation via the World Heritage Centre to the Advisory Bodies of the World Heritage Convention, before any further decisions are made related to the implementation of those programmes and projects.

In a previous period a number of uncontrolled interventions and developments occurred in the Old City of Ohrid and the lakeshore, which is the result of a lack of consistent control and management of the property. However, the mission found that new tools are under preparation or have already been created. For example, a detailed conservation plan is already available and the legal context for a more efficient and effective protection has recently been strengthened with the adoption of two specific Laws for the World Heritage property, in particular on the Historic City of Ohrid. Notwithstanding, these important tools are not yet fully operational.

One of the most substantial insufficiencies is that the Management Plan of the property is still under preparation. It is crucial that the Plan is finalised so that management arrangements can become fully operational as soon as possible, with an officially adopted Management Plan and a powerful Management Body to enforce measures to better control interventions within the World Heritage property.

6.0 ANALYSIS AND ANSWERS TO THE RECOMMENDATIONS

Based on the findings of the mission and the suggested recommendations, the national competent institutions had adopted the following conclusions:
6.1. Construction plans for the project “Instauration of St.Clement’s University at Plaoshnik”

General recommendations:

Based on the mission recommendations, the architectural design team made a comprehensive revision of the technical drawings of the project, especially in terms of the size, the elevations and the scale, in order to eliminate the potential impacts from the construction of the proposed structures on the Outstanding Universal Value of the property. The review had made a realistic assessment of the capacity of the location, not only in view of the physical aspects, but also considering the immaterial associations of the place.

All corrected project designs (blueprints) made in line with the Advisory mission’s recommendations will be revised by the Board for Instauration of St.Clement’s University at Plaoshnik in Ohrid, that had prepared the Project program for instauration of the complex and that had also selected the best concept design. The Board that is comprised of experts will make the adequate changes to the architectonic project and will confirm that during the implementation of the project, the agreed recommendations to secure that there will be no negative impact on the site features and the OUV will be taken in consideration.

**COMPLEXI:**

This complex includes: the Residential building of the Macedonian Orthodox Church, the Monastic quarters and the Faculty of Theology.

- **Residential building of the MOC** – Planned condition according to the project design

The building location for Building 2 has a surface of 19,30 m x 16,7 m and it is located to the south of Building 1, i.e. at the furthest southeastern part of the site, at the very limits of the area. It is located at a distance of about 30 m from the apse of St.Clement’s church. It was initially planned to be a building with a basement, ground floor, upper floor and mansard. The total height of the building was planned to be 6.05 m. The used building materials are traditional – the stone is mostly present at the exterior rendering of the building. The roofs are wooden and hipped and covered with ceramic roof tiles.

Based on the Advisory mission’s recommendations, for this building that was already built as a structure during the mission it had been allowed to complete it in line with the adopted plans and the issued building permit. The mission did not have any remarks face to its size, height and architectural form.
-Monastic quarters- Planned condition according to the project design

The location of Building 1 (36.5 x 27.4 m) is at the extreme eastern part of the site attached to its borderline. It is located at approximately 30 meters to the east of the apse of St. Clement’s church. The building has envisaged height of G+2 floors (basement, ground floor and first floor). The total height of the object from the ground floor to the point of the roof ridge is 11.05m.

The presence of the wooden *chardak* (terrace) with wooden pillars and fence is an element of typical monastic architecture. The *chardak* is present on the eastern and western façade of the second floor. The entrance doors, windows and balcony doors are planned to be made out of wood. The used building materials are traditional – the stone is mostly present at the exterior rendering of the building. The roofs are wooden and hipped and covered with ceramic roof *tiles*. 
Based on the mission recommendations, the existent architectural project had been redesigned i.e. the new solution for this project has the upper most floor removed and thus the height of this building is equaled with that of the Residential building. In addition, the exterior architectural appearance had been redesigned and adjusted with appropriate architectural solution corresponding with the architecture of the neighboring building – the Residence of the MOC. Thus, the two buildings represent one architectural unit, both in terms of its sizes and in terms of their exterior architectural appearance. In what concerns the foreseen functions within the building, they had been adjusted according to the new size and the new height, i.e. more precisely, according to the new usable surface of the building, that, with the planned changes, is being decreased for 731,20m². The total height is reduced for 3,05 meters and the total height of the altered building is 8,10 meters. These changes are meeting the mission recommendations.

-Monastic quarters-
- **Faculty of Theology – Planned condition according to the project design**

The building location for Building 3 has a surface of 40 x 35 m (about 1010 m²) and it is situated at the furthest north-western part of the site. It is located at about 10 meters to the east of the poly-conch basilica and 10 m to the north of Complex II/III. The building will have a height of G+2 (basement, ground floor, upper floor and loft). The dimensions of the building at the base are of 40 x 35 m. The total height of the building from the ground floor to the roof ridge is 11.02 m.

The entire northern façade is made out of stone and brick, with pilasters of stone ending in semi-circular arches of brick at all levels. The masonry of semi-processed stone is decorated with wreaths of brick at the ground floor level and they appear at all facades following the line of the formed stone arches that enable access and communication with the remains of the archaeological buildings. The formed arches of full brick appear at the facades also as a semicircular decoration above the closed niches, above the semicircular openings, and they appear as horizontal elements on and above the level of the last floor. The processed walls of travertine appear between the stone pilasters at the lowest parts of the building.

Based on the Advisory mission’s recommendations, the necessary archaeological research on this area had already commenced and are ongoing with accelerated intensity. Having in mind their dynamics, as well as the buildings that are being discovered and unearthed, it had been concluded that it is possible to lay the foundations of this building. Due to the presence of remains of older buildings, it is planned to lay the foundations with individual foundation pillars with appropriate dimensions, incorporated among the older buildings remains.

Considering the height of the building, a complete revision of the project design had been made and the building’s height had been reduced for one level of 3,10 meters, thus securing an improved integration of the proposed building within the setting. These changes also reflected in the necessary reorganization of the usable interior space, and the total surface of the building had been reduced for about 700 m², while the highest elevation is 6,45 meters.

These changes fully accept the Advisory mission’s recommendations.
COMPLEX II AND III - Planned condition according to the project design

This Complex includes: St. Clement’s Library – building A; Centre for Humanities – building B and Museum of Plaoshnik – building C.

– Planned condition according to the project design

The building location of Complex II/III is an elongated area of 125 x 20 m in the direction of north-south and is located at the extreme western part of the site. It is located at about 40 meters to the west of the western side of St. Clement’s church. The orientation of the building follows the terrain that falls in a cascade manner to the west. The building has a height
of G+2 floors (basement, ground floor and two upper floors). The dimension of Complex II/III is 125 x 20 m at the base. The height of the building from the ground floor to the point of the roof ridge is 12.42 m.

The complex is divided into three spatial-semantic parts: **Building A** – that houses St. Clement’s Library; **Building B** – that houses the Macedonian Institute for Humanities, the administrative and parts of the functional and auxiliary rooms of St. Clement’s Library; **Building C** – that houses the Plaoshnik Museum and the Ohrid Gallery of Icons.

Building A will host St. Clement’s Library. From the level of the entrance at the elevation of 0,00m the building spreads with one floor below and two floors above the entrance, which means that it is developed on a total of 4 levels (floors). The lowest level is on an elevation of -4.16mm while the highest one is on the level of 12.42m.

Building B has 5 levels, grouped, but independent of each other and directly connected to the institutions they serve. They house the administrative and parts of the functional and auxiliary rooms of the Plaoshnik Museum and St. Clement’s Library, the Centre of the International School for Applicative Conservation as well as the Macedonian Institute for Humanities. Dependent on the fall of the terrain and the archaeological remains at the location, from the level of the entrance (point 0.00 m) the building spans on two additional levels up and two additional levels down (five in total). The highest point to the roof is 11.67 m.

The building B contains the Plaoshnik Museum and the Gallery of Icons. From the level of the entrance (0.00 m) this building has two subterranean and 2 above ground levels. That means that the building has five levels, while the highest point to the roof is 9.90 m.

The eastern façade of Complex II/III (the one facing the interior of the site) is going to be made of brick and tile in *opus mixtum*, especially on the ground level of the buildings so as to achieve greater correlation with the identity of the horizontal stratification of the site. The masonry is of semi-processed stone at the ground floor and decorated with wreaths of full brick which appear on all of the façades following the line of the formed stone arches which could be entered though and communicate with the remains of the archaeological buildings. The processed stone masses of travertine and brick are on parts of the façade.

Certain parts of the facades are rendered with horizontal layers of travertine and full brick with alternate insertion of the window openings between the masonry for illumination of the space. Parts of the roofs are wooden and are of the flat type with two short domes covered with tiles above the Building A and Building C.

*Based on the Advisory Mission’s recommendations, there had been a complete revision made of the project design for the entire complex. In the case of buildings A, B and C, one level height had been reduced, thus respecting the recommendation, not to have a higher elevation than +3.68meters (according to the existent plans). In addition, a revision had been*
made of the roofs and the facades of the buildings. The glass domes had been removed and replaced with hipped wooden roofs covered with ceramic roof tiles, while the illumination of the interior will be enabled with hidden glass pyramids, in the same manner as for the monastic quarters. The total height of the ends of the roofs is reduced for 2.85m. Moreover, the glass facades facing west had been remodeled and adjusted with the architecture of the other buildings within the complex. The redesigned blueprints follow the slope of the terrain and do not impact (with their size) on the visual qualities of the site. In the rendering of the façade appearances, we have used as construction materials stone, brick and travertine, thus blending them in the complete architectural appearance of the entire complex.

The cutting of the trees around the planned buildings had stopped, and, upon the finalization of building activities, we plan to horticulturally arrange the area, thus also enabling shading of the buildings within the space, and improving the visual quality.

There is an interior reorganization taking place on the area that will not exercise a negative impact on the foreseen changes of the size and the façade appearance of the complex. Considering the presentation of the remains of older buildings that are discovered during the archaeological excavations, they will be maximally respected and presented in the exhibition area. The total usable surface with the foreseen changes is reduced for 2693.3m². By implemented these changes, the Advisory mission’s recommendations are fully accepted.
Complex IV - Planned condition according to the project design

The planned building location of Complex IV was with dimensions of 125 x 15 m (1858.4 m²) and located to the west of Complex II/III, parallel to it, towards St. Clement’s park. The building was foreseen to have a height of G + 2 floors (basement, ground floor and two upper floors) The total height of the object from the ground floor to the point of the roof ridge is 7.6 m.

It was planned to build 9 separate affiliations of international universities, separated into three parts around one joint computer centre. The computer centre is located in the centre while to the west, south and north are the affiliations in groups of three.

In line with the Advisory mission’s recommendations, on the planned location where the Affiliations of international universities and the Computer centre were to be built, at the moment there are the necessary archaeological excavations taking place. As a result of this research on the area there are already remains of older buildings and some movable archaeological material being discovered.

The State Party is seriously considering the recommendations of the Advisory mission to either relocate the buildings from Complex IV outside of the Plaoshnik area or to make a complete revision of the architectural and designed project in terms of the proposed heights and the number of adjacent buildings and the Computer Centre. The World Heritage Centre will be additionally informed on the decision taken by the State Party in view of the Complex
IV.

6.2 Proposal for lakeside construction by “Sahara India, Pariwar”

Concerning the coastal development of Lake Ohrid for economic development and development of tourism, the Ministry of Transport and Communications within its legal competences had approved the State urban planning documentation for the tourism development zone Ljubanishta 1 in Ohrid municipality, located on the shore of Lake Ohrid in relation with the investor “Sahara India Pariwar”, i.e. the Proposal for coastal development of “Sahara India Pariwar”. It had also issued Consent for the Urban plan outside a populated area for the tourism development zone “Krasta”, C.M. Kalishta in Struga municipality. We would like to accentuate that in the process of adoption and approval of he listed documentation, the Ministry of Transport and Communications though the National Commission for UNESCO, had secured opinions and guidelines from the relevant institutions, and those were respected and incorporated as such in the documents. They will be taken into consideration in all further phases or implementation aspects. In this regard, we quote the guidelines we have received that all planning documents, architectural and urbanistic, concept and executive projects (in the phase of their preparation), as well as the Environmental Impact Assessment Studies and Cultural Heritage Impact Assessment Studies that are to be prepared in the future should be submitted to UNESCO’s World Heritage Centre, i.e. to its Advisory bodies ICOMOS and IUCN through the National Commission for UNESCO. This is a mandatory obligation in the effectuation of the above-mentioned tourism development zones on the coast of Lake Ohrid.

We would like to also inform that within the process of adoption or approval of the future planning documents or urban plans, the Ministry of Transport and Communications, again through the National Commission for UNESCO, will provide opinions and guidelines from the relevant institutions, and they will be respected and incorporated as such in the documents.

6.3 Development of railway corridor VIII

Concerning Corridor VIII, that refers to the construction of a railroad that will secure this communication between the Republic of Macedonia and the Republic of Albania (that crosses through the protected property), in the period 2009-2011, a Feasibility study had been prepared along with an Environment Impact Assessment Study. In line with this document, the corridor of the future railroad had been defined, but the track had not been defined. In the course of the preparation of this document due attention was given to the Spatial Plan. In line with the planned dynamics, it is foreseen that by the middle of 2017, the overall investment and technical documentation should be completed. In the course of the future elaboration of this project there will be Environmental Impact Assessment Study and a Cultural Heritage Impact Assessment Study prepared and also opinions and guidelines from the relevant institutions secured. They will be respected and incorporated as such within the documents. Concerning the conclusions and
recommendations of the Advisory mission on the development of Corridor VIII, we can confirm that they will be taken into consideration and that steps will be taken for identification of alternative routes. However, a concrete standpoint will be taken upon the preparation of the environment and heritage impact assessment studies.

6.4 Port development

Concerning the reconstruction of the existent and the building of new ports – we inform you that the Ministry of Transport and Communications does not foresee any concrete steps for bigger development projects so far, such that could result in enhanced activities that might emanate significant impacts on the environment and the cultural heritage and on the visual qualities and the potential influences on the ecological components of the lake. If, in the future, there is to be reconstruction of the present or construction of new ports, the Ministry of Transport and Communications, the National Commission for UNESCO, the Ministry of Environment and Spatial Planning and all other relevant institutions from the sphere of cultural and natural heritage of the Region, will submit their opinions and guidelines that will be taken in consideration in order to preserve the authenticity and integrity of the world heritage property. In addition, if such a need arises, all development projects will be carefully assessed prior to their implementation.

6.5 Construction of a hydrodrome

The construction of a hydrodrome is not foreseen as a concrete activity at the moment. If there is a need to construct one, the Ministry of Transport and Communications will secure opinions and guidelines from the relevant institutions before starting any activities. However, we emphasize, there is no definite plan to construct a hydrodrome.

6.6 Future development projects

Considering the future project activities under the competences of the Ministry of Transport and Communications, we would single out the following:

- The regional road A3: Ohrid – Peshtani, with an overall length of 12,1 km. The road starts at the node “Vrshek” that is right above the gas station at the exit of the town of Ohrid and it ends at the village of Peshtani. The following road links will be constructed with the surrounding settlements and touristic spots: node “Sv.Stefan”, node “Racha” and a surface crossroad at the Metropol hotel.

During the preparation of the project documentation, the Public Enterprise for the State Roads had secured an opinion from the Ministry of Culture – Cultural Heritage Protection Office that enlists three archaeological sites with data for further procedures. There is a secured document from NI Institute for Protection of Monuments of Culture and Museum – Ohrid that
indicates that on this road line there are no registered cultural/historical sites and they give guidelines for future proceeding in case an archaeological site is to be discovered during the road construction works. We have to emphasize that the need for the construction of this road emerges also from the fact that it connects the border crossing Sv.Naum, as a single cross-border communication in that region that is necessary and that should meet certain standards.

Concerning the tourism development zone “Ljubanishta 2” in CM Ljubanishta and CM Ohrid, there is a starting phase of preparation of Urban planning documentation for a tourism development zone. The zone is located on the shore of Lake Ohrid and foresees urbanization of 289.5 ha. The starting data and information concerning the cultural and natural heritage of the region from the Agency for Environment, the Ministry of Culture – Cultural Heritage Protection Office and the Hidrobiological Institute from Ohrid are secured. In the further procedure for approval of the Urban planning documentation, the noted institutions will be involved once again, along with the Ministry of Environment and Physical Planning, the National Park “Galichica”, the National Commission for UNESCO etc., that will offer their opinions and guidelines, while, in line with the Law on Environment, a Strategic assessment of the environment impact will be conveyed.

6.7 Management Plan

The draft version of the Management Plan for the world cultural and natural heritage property that had been previously prepared, considering its importance, was subjected to a revision having in mind the latest information and inputs concerning the natural and cultural heritage. Considering the importance of this document, it will be adopted by the Government of the Republic of Macedonia as soon as possible.

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We would like to note as one of the most significant interventions in the lakeshore area, the reconstruction of the Prehistoric palafitte settlement with 24 wooden huts, with a modern museum and a centre for underwater research and appropriate horticultural arrangement of the setting. During the implementation of this project, there were data used from the performed underwater archaeological research in this area that had contributed to the locating of the settlement. Special attention was accorded not to disrupt the cultural landscape, i.e. there was an excellent combination made between what is reconstructed – the palafitte settlement with the wooden huts made out of authentic construction materials and the protection and presentation of the natural landscape that was only enhanced and by no means damaged.
With the proclamation of the Old Town Nucleus of Ohrid as cultural heritage of special significance, as well as with the preparation of individual studies for 200 individually protected buildings on the territory of the protected region, many of the existed problems with the integrated protection had, greatly, been resolved. NI Institute and Museum – Ohrid in the past years worked on the conservation of facades of characteristic buildings and characteristic ambiance ensembles. Their conservation was performed with traditional building materials, preceded by research. In addition, there were works on conservation of the interiors of characteristic buildings of profane architecture with full respect of their authenticity.
There was also conservation and presentation endeavors of archaeological sites, conservation of sacral buildings (Christian and Muslim), and there are continuously made Protective Conservation Surveys that are giving guidelines for the urbanization of the territory of the entire region.
With the proclamation of the Old Town Nucleus of Ohrid as cultural heritage of special significance, there is an obligation to prepare an Integrated Protection Plan. There is ongoing intensive work on this Plan already and it will soon be finalized. There are specific studies being made for unification of the advertisements boards, the urban equipment and the necessary markings (signs) indicating the monuments. They will greatly improve the overall picture for the ensemble and the individual ambiances.
As one of the greatest problems is the lack of a Detailed urban plan for the entire monumental ensemble that should be in line with the latest legal regulations. It should be prepared by the local self-government of Ohrid municipality. In reality, until such a planning document that is necessary for the normal functioning of the legal regulations, there are many problems emerging and negatively influencing the building, the protected ensemble, as well as the entire protected region.