

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/AS/1608/IR

Charenton-le-Pont, 21 December 2018

H. E. Mrs Claudia Reinprecht  
Permanent Delegation of Austria to UNESCO  
Maison de l'UNESCO  
1, rue Miollis  
75732 Paris CEDEX 15

World Heritage List 2019

**Frontiers of the Roman Empire – The Danube Limes (Austria, Germany, Hungary, Slovakia) –  
Interim report and additional information request**

Dear Ambassador,

As prescribed by the revised Operational Guidelines for the Implementation of the World Heritage Convention and its Annex 6, the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2019. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation process.

The ICOMOS technical evaluation mission to “Frontiers of the Roman Empire – The Danube Limes” was carried out by David Lakin (United Kingdom) and Adrian Olivier (United Kingdom) in September-October 2018. The mission experts highly appreciated the availabilities and support provided by the experts for the organization and implementation of the mission.

At the end of November 2018, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2019. The additional information provided by the States Parties, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2019.

We thank you for the availability of your Delegation to the meeting held on Saturday 24 November 2018 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the discussions at the ICOMOS Panel meeting. Following the completion of their deliberations, the ICOMOS Panel has identified areas where it considers further information is needed.

Therefore, we would be pleased if the States Parties could consider the following points:

The ICOMOS Panel considered that the level of detail provided in the Nomination dossier for each of the component sites is impressive, including how each contributes to the proposed Outstanding Universal Value. The Nomination dossier also shows clearly how the four States Parties have worked closely together in the preparation of the Nomination, and that despite inevitable differences in national perspectives and management approaches, there is a good degree of coherence. The ICOMOS Panel considered, nonetheless, that there are a few, important areas where further work would be needed. These relate mainly to the delineation of some component sites and Buffer Zones, to the relationship between the component sites and the River Danube, and to some aspects of protection and management.

### **Boundaries of nominated components in relation to their contribution to the proposed Outstanding Universal Value**

For a small number of the component sites, the ICOMOS Panel considers that there are some weaknesses where the portion of a component site that has been nominated does not have the capacity to convey its contribution to the proposed Outstanding Universal Value, as set out in the Nomination dossier, mostly for the reason that the boundary has been drawn too tightly.

In order to achieve a coherent approach to the delineation of boundaries for the nominated component sites, in relation to the way each of the sites contributes to the proposed Outstanding Universal Value of the overall series, the ICOMOS Panel would like to ask for a reconsideration of the boundaries for the following component sites:

#### *Legionary fortress, Vienna (ID 30)*

Although only 2% of the fortress has been nominated and less than 0.5% of the whole fortress, with civil settlements and cemeteries, the component site is said to reflect the importance of Roman lifestyles at the edge of the Empire. Such a small area cannot convey this wide perspective. Given the importance of the legionary fortresses as the main nodal points of the overall frontier, it is essential that sufficient is nominated to convey their scale, scope and overall value to the fortifications.

#### *Legionary fortress, Regensburg (ID 6)*

Only the fort has been nominated while the component site is said to reflect the fact that this was the only legionary fortress in the province of Raetia and its related civilian settlement was the largest in the province. The nominated component cluster is confined to the visible sections of the fortress defences which include the northern gate, north-eastern tower, eastern wall and south-eastern corner (although a drafting error seems to have excluded a small portion of the south wall at ID6i). Also included is a small portion of two barrack buildings surviving beneath the Niedermünster. The nomination excludes buried remains of the defences such as other sections of wall and ditches and also entirely excludes the civil settlement and associated cemeteries.

The nominated component site should include a sufficient proportion of the elements of associated extra-mural activities (*canabae*, cemeteries etc.) to express the value of the whole ensemble and not just the fortress.

#### *Budapest district 3 – Aquincum legionary fortress and *canabae* Hercules villa (70 a-c)*

The nominated site comprises the area enclosed by the wall of the civil town, the well houses, the amphitheatre, a watchtower on the banks of the Danube, and a few of the suburban buildings of the civilian town (including an inn to the south) as well as part of the northern, eastern and western suburbs.

The gladiator school, individual graveyards and cemetery, other suburban structures to the south, a pottery workshop complex and watchtower to the east and a stone building on the Római shore have not been included in the nominated area (but are located in the Buffer Zone).

If the Municipium is considered as a whole, together with its associated civil suburban settlements and associated structures, which all have a clear and dynamic relationship with the Municipium and contribute highly to the totality of the value represented by the whole site, then the exclusion of these are likely to compromise the integrity of the whole site.

It is requested that the area of the nominated component site be extended to include a sufficient proportion of suburban extra-mural features and structures in the civil town.

#### *Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)*

At these component sites, the interior of the military defences are located in the Buffer Zone rather than being included in the nominated component sites, which they should be.

#### *Rusovce - Gerulata (ID 32)*

The component site is said to reflect 'the entire gradual and long-term development of Roman fortification architecture in this section of the Danube limits from the beginning of its construction up to the building of the late-antic fortification in the post Valentinian period around 380 AD' – that is from the 1st to the end of the 4th century CE. What has been

nominated, though, only covers the fort's post-Valentinian construction stage (4th century AD) which consisted of a stone tower built into corner of the older fort, which is in the Buffer Zone.

The nominated component site should also include a sufficient proportion of the elements of associated extra-mural activities (so-called *vicus*, cemetery etc.) to express the totality of the values of the whole ensemble and not just the later fort / Watchtower / Burgos.

Nyergesújfalu Sánc-hegy - Crumerum (ID 49); Nagytétény-Campona (ID 73); Százhalombatta-Dunafüred - Matrica (ID 75a-b); Dunaújváros Öreghegy - Intercisa (ID 78 a-d); Ócsény Gábor-tanya - Alisca (ID 92)

At these sites, at least some of the extra-mural activity and associated features (the so-called *vicus* or military *vicus*) of the component sites are considered part of how these sites contribute to the proposed Outstanding Universal Value.

However, the area of extra-mural activity that has been included in the nominated sites is very limited and it is not clear whether this represents a sufficiently significant proportion of the elements necessary to convey the value of fort and extra-mural features.

It is requested that the delineation of these component sites be reviewed in order to establish whether this extends over a sufficient proportion of the extra-mural activity/features (*vicus* etc.) and if this is not the case, then the boundary should be revised accordingly to reflect adequately the integrity of the ensemble.

Bum-Bum kút - Ad Mures (ID 42); Dunabogdány Váradok-dűlő - Cirpi (ID 64); Szentendre Ulcisia (ID 68); Budapest XI kerület Albertfalva (ID 72); Budapest district 22 Nagytétény – Campona (ID 73); Kölked Hajlok-part – Altinum (ID 98)

These forts have been nominated as component sites without the inclusion of any related extra-mural activity or associated features. This is inconsistent with the approach adopted for the majority of nominated fort and *vicus* ensembles. The reasons for this inconsistency are not entirely clear and may relate not to principles of integrity but rather to administrative difficulties. In the case of Nagytétény – Campona, it appears to be related to the difficulties of creating a Buffer Zone beyond enlarged boundaries.

It is requested that boundaries of these component sites be reviewed to include a sufficient proportion of extra-mural activity so that the integrity of the fort / *vicus* ensemble is properly and consistently reflected. If this cannot be achieved, clear reasons should be put forward.

St Peter's church, Straubing (ID 7b)

The evidence for the extent of this late defended site is not strong. Excavations have been limited to small areas within the existing cemetery and only a small part of the northern defensive wall has been found. The defined extent of the component site appears to be conjectural.

It is requested that the site boundary for this component site be reviewed and consideration given to whether further investigation is necessary or whether 7b should be removed from the nomination in the absence of sufficient evidence to define its extent and nature.

Komárom-Szőny Brigetio (ID 45)

The boundaries of this component site should be reviewed to ensure that it encompasses the area of archaeological survival of the Fort and *canabae* – possible to the edge of the currently defined Buffer Zone (but excluding the oil refinery site).

Sibrik-domb – hillfort (ID 61)

The Fort ditch is apparently not included in the area of the component site. The area of the component site should be extended to include the whole of the fort ditch.

Dunaszekcső Halena – brick kilns (ID 97)

Definition of the component site relates to the attested presence of Roman structures defined by trial excavation, the spread of surface finds, and limited geophysical survey.

In the absence of detailed evidence for other related structures, it was not considered by the authorities appropriate to extend the area of the component site to include such potential evidence. However, this decision should be reconsidered either by simply including the area of potential in the nominated component site, or by carrying out a more extensive geophysical survey to establish whether this potential can be corroborated by firm evidence.

The modern road here coincides with the alignment of limes road so there is no need to extend either the boundary of the component site or the boundary of the Buffer Zone South beyond the road.

#### Temporary Forts Iža - Kelemantia (ID 46)

There is an issue of consistency in relation to the way that the two clusters of temporary forts have been nominated: the Brigetio ensemble of temporary camps ID 43a-n have been nominated, while the other set at Iža - Kelemantia is in the Buffer Zone.

As these temporary forts are seen as being exceptional to this part of the frontier, both sets of forts should be part of the nominated property. The ICOMOS Panel would like to request a reconsideration of the nomination approach for these particular component sites.

If the temporary camps of Iža - Kelemantia have a direct and dynamic relationship with the fort of Kelemantia and are considered critical to understand and appreciate the value of the fort (which appears to be the case), then they should be incorporated in the nominated component site of the fort. If they are considered to be separate but significant works of military architecture with a different function in their own right (as is the case in Hungary), then they should be nominated as a separate component site.

The ICOMOS Panel appreciates that there could be difficulties in providing a Buffer Zone if the temporary forts are nominated as one site, but would nevertheless requests that consideration is given to how the immediate setting could be protected.

There is a further issue in relation to whether each of the temporary forts is seen as a separate site or whether they are considered to be two clusters of inter-related forts. The Brigetio forts have been nominated individually and only 21 of the 34 examples known are nominated because these are the only ones that are firmly dated.

Ideally both sets of forts should be nominated as clusters to reflect their purpose and use. They are a significant archaeological landscape that were used by the Roman army to construct temporary camps at this point on the Danube. For the Brigetio forts, the entire ensembles should be grouped together either as a single nominated component site with a Buffer Zone that extends to all the interstices between the camps (where more discoveries are undoubtedly anticipated) or possibly as two larger groups connected by a single Buffer Zone.

The difficulty with nominating the temporary forts in Hungary as a cluster is understood. The ICOMOS Panel would nevertheless request that consideration is given to moving towards a cluster approach, even if this cannot be achieved in one step. The ICOMOS Panel would also request that consideration is given to including all the known temporary camps not just those that have been dated.

Furthermore, it is requested that the delineation of the Buffer Zone is reviewed so that it provides better protection to the whole of this extremely significant archaeological landscape.

#### **Buffer Zones**

A clear definition for the settings of the component sites and how these support the nominated property does not appear to have been basis for deciding how the immediate setting might be defined as Buffer Zones for all sites. As a result, there is considerable variation in the way in which Buffer Zones have been applied.

The ICOMOS Panel considers that there is a need for a defined coherent approach to the scope, purpose and delineation of Buffer Zones, in order to achieve Buffer Zones that better reflect their purpose of supporting the component sites, in terms of how they contribute to the proposed Outstanding Universal Value. The ICOMOS Panel would request that Buffer Zones at the following component sites are re-considered:

Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)

At these component sites, each element of the cluster has been assigned a separate Buffer Zone. At each location, the combined buffers cover the parts of the interior of the military defences which were not included in the nominated components. The fragmentation of the Buffer Zones appears to impose arbitrary divisions on unified monuments. (This is in contrast to Aquincum (ID70a-c) where the nominated elements of the fortress, *canabae* and amphitheatre are lie within a single widely defined Buffer Zone.)

In addition, whilst at Enns the associated civil settlement is in part included in the nominated site, the civil settlements associated with the forts at Wallsee and Zeiselmauer are not included in the nominated sites or the Buffer Zones as currently defined.

It is requested that the fragmented Buffer Zones be reviewed with a view to defining unitary Buffer Zones at each location.

Furthermore, at Wallsee and Zeiselmauer consideration should be given to extending the Buffer Zones to include the civil settlements associated with the respective forts.

Straubing Kastelle (ID 7 a-b)

Consider defining a Buffer Zone for the Ostkastel to include whole of civil settlement.

Künzing Amphitheater und vicus (ID 8)

Consider re-defining the Buffer Zone to include the remainder of the vicus.

Passau – Kastelle und Burqus (ID 9 a-c)

Consider re-defining Buffer Zones for all three component sites to include all of civil settlement at 9a and all defences at 9b and 9c.

Mautern Kastell (ID 24a-b)

Consider combining Buffer Zones into single zone defined by earlier fort walls plus a margin around. Also consider extending the Buffer Zone to include civil settlements.

Camuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31)

Consideration should be given to defining a Buffer Zone to protect the setting of the component site from further visual intrusion – as a wind farm adjacent to the southern boundary of the property has a substantial negative impact on the setting.

Abda (ID 37)

In places the Buffer Zone is directly adjacent or very close to the component site boundary – this does not provide a sufficiently wide band of protection around the component site.

The Buffer Zone should be extended in order to provide an adequate band of protection around the site.

Although deep ploughing is prohibited, and ploughing is restricted to a depth of 0.30 m, continued ploughing will degrade the slight topographic features that represent the line of the Limes road and the location of the watchtower. The protection for the Buffer Zone needs to be strengthened to prohibit any ploughing.

Nyergesújfalu Sánc-hegy - Crumerum (ID 49)

Review the Buffer Zone to protect key views and sight lines and consider extending it to the South West.

Pilismarót Kis-hegy Ad Herculem (ID 56)

Consider extending the Buffer Zone to comprise the whole of the knoll - i.e. extended to edge of the encircling roads. And also consider extending the Buffer Zone and to include any wider area of extra-mural activity.

Gizellamajor – Fortlet (ID 58)

The Buffer Zone is very narrow along the western edge of the property (because of the way the plot boundaries are configured here). Consider extending the Buffer Zone to the West of the property – as to extend the area of protection.

#### Verőce Dunamező-dűlő, Solva 38 (ID 63)

The Buffer Zone for this bridgehead component site is restricted to a length of the river bank running West-North-West and East-South-East.

In analogous circumstances (cluster 67a-b) the Buffer Zone extends across the river to encompass the pair of bridgeheads. In the case of Component 63 only the bridgehead on the North bank of the Danube has been nominated; however, because of the transverse relationship with three other bridgeheads on this alignment across the Danube, perhaps consideration should be given to extending the Buffer Zone across the island to the South bank of the Danube, in order to include the assumed location of the three other bridgeheads in this protective zone.

It is recognised that if these are already identified as national archaeological monuments this may not be considered necessary strictly on ground of protection of the sites, but it would nevertheless be appropriate on grounds of integrity in recognising the links between sites.

#### Various other component sites in Hungary

In most component sites in Hungary, the Buffer Zones have been defined as extending to the boundary of the property lots (on the cadastre map) that contains any element of the nominated component site. As currently constituted, the nominated component sites comprise 2,915 separate plots, and it is easy to understand why the pragmatic approach to the delineation of Buffer Zones has been used.

As delineated though the Buffer Zones generally do not present a coherent approach to protecting the setting of the component sites and supporting their contribution to the proposed Outstanding Universal Value.

The ICOMOS Panel would request that the delineation of Buffer Zones should be reviewed, and where appropriate, their boundaries revised to provide a more logical and effective zone of protection around the relevant nominated component site.

#### Regensburg (ID6) and Vienna (ID30)

For sites that fall within existing inscribed properties, no Buffer Zones have been provided. These are the legionary fortresses at Regensburg (ID6) and Vienna (ID30) as they are sited within the Regensburg Altstadt with Stadthof and the Historic Centre of Vienna World Heritage Sites respectively. The reason for not delineating Buffer Zones was that at Regensburg 'the Nominated property is situated in the existing World Heritage Site Old Town of Regensburg with Stadthof which has a Buffer Zone in its own right', while at Vienna this was 'due to the built-up vicinity of the component part'. In both cities, the survival of Roman remains even in densely built urban areas has been demonstrated by excavation on many occasions in recent years. The potential benefits of a Buffer Zone in defining the potential areas of archaeological interest associated with the components would seem clear for both component sites. Equally, the function of a Buffer Zone defined for one property cannot readily protect a second property defined for an entirely different reason as Buffer Zones should support the attributes of Outstanding Universal Value in the component sites to which they relate. Thus, the ICOMOS Panel would be pleased if the States Parties could consider to define appropriate Buffer Zones for these two properties related to Roman remains.

#### **Links to the Danube**

The River Danube was the Roman Frontier and joins together all the nominated structures, many of which were sited strategically in relation to its shores and were meant to be visible from the river, long views from watchtowers, forts, and hillforts: this contribute to their authenticity. Although it is fully appreciated that the river has moved its course since Roman times and that its exact position when the frontier was active is not fully known, the ICOMOS Panel does consider that there is a need to analyse precisely where views of the river do exist, or could exist if vegetation were differently managed, and to strengthen the protection and management of such views between sites and the River Danube, and between neighbouring sites where it is known that there was inter-visibility, either by extending Buffer Zones or defining protected views.

The ICOMOS Panel would like to request that details of such a project be provided, with an approximate timeframe indicated for when it might be achieved. Furthermore, it would be helpful to understand how research into the Roman course of the river might be supported and undertaken.

### **Protection and Management**

The ICOMOS Panel considers that legal protection would need to be put in place for the component sites at Carnuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31) to protect its cultural attributes. While it is appreciated that this component site benefits from protection for its natural aspects, this is not adequate to ensure its long-term protection as part of an inscribed serial property.

In advance of the development of management plans for component sites in Hungary, summary conservation statements for each nominated component should be developed. These should be simple structured statements for each nominated component site sets out the fundamental conservation and management issues for that component in a practical format. Such simple, summary conservation statements need to be compiled for each nominated component site prior to inscription.

For components sites in Austria and Germany (Bavaria), the ICOMOS Panel considers that summary action plan statements need to be developed, before inscription, for each nominated component site to complement the Management Plan and make it more site specific.

We look forward to your responses to these points, which will be of great help in our evaluation process.

We would be grateful if you could provide ICOMOS and the World Heritage Centre with the above information **by 28 February 2019 at the latest**, the deadline set out in paragraph 148 of the Operational Guidelines for supplementary information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any supplementary information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation process.

Yours faithfully,



Gwenaëlle Bourdin  
Director  
ICOMOS Evaluation Unit

Copy to      Austrian Federal Chancellery - Section II (Art and Culture) –  
Department II / 4a UNESCO World Heritage  
Permanent Delegation of Germany to UNESCO  
Bavarian State Ministry for Education and Culture, Science and Art  
Bavarian State Office for the Preservation of Monuments  
Permanent Delegation of Hungary to UNESCO  
Hungarian Prime Ministry  
Limes World Heritage Consciousness - Budavári Real Estate Development and Operations Ltd.  
Scientific Directorate  
Permanent Delegation of Slovakia to UNESCO  
Monuments Board of the Slovak Republic  
UNESCO World Heritage Centre

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/AS/1608/IR

Charenton-le-Pont, 21 December 2018

H. E. Mr Stefan Krawielicki  
Permanent Delegation of Germany to UNESCO  
Maison de l'UNESCO  
1, rue Miollis  
75732 Paris CEDEX 15

World Heritage List 2019

**Frontiers of the Roman Empire – The Danube Limes (Austria, Germany, Hungary, Slovakia) –  
Interim report and additional information request**

Dear Ambassador,

As prescribed by the revised Operational Guidelines for the Implementation of the World Heritage Convention and its Annex 6, the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2019. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation process.

The ICOMOS technical evaluation mission to "Frontiers of the Roman Empire – The Danube Limes" was carried out by David Lakin (United Kingdom) and Adrian Olivier (United Kingdom) in September-October 2018. The mission experts highly appreciated the availabilities and support provided by the experts for the organization and implementation of the mission.

At the end of November 2018, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2019. The additional information provided by the States Parties, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2019.

We thank you for the availability of your Delegation to the meeting held on Saturday 24 November 2018 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the discussions at the ICOMOS Panel meeting. Following the completion of their deliberations, the ICOMOS Panel has identified areas where it considers further information is needed.

Therefore, we would be pleased if the States Parties could consider the following points:

The ICOMOS Panel considered that the level of detail provided in the Nomination dossier for each of the component sites is impressive, including how each contributes to the proposed Outstanding Universal Value. The Nomination dossier also shows clearly how the four States Parties have worked closely together in the preparation of the Nomination, and that despite inevitable differences in national perspectives and management approaches, there is a good degree of coherence. The ICOMOS Panel considered, nonetheless, that there are a few, important areas where further work would be needed. These relate mainly to the delineation of some component sites and Buffer Zones, to the relationship between the component sites and the River Danube, and to some aspects of protection and management.



### **Boundaries of nominated components in relation to their contribution to the proposed Outstanding Universal Value**

For a small number of the component sites, the ICOMOS Panel considers that there are some weaknesses where the portion of a component site that has been nominated does not have the capacity to convey its contribution to the proposed Outstanding Universal Value, as set out in the Nomination dossier, mostly for the reason that the boundary has been drawn too tightly.

In order to achieve a coherent approach to the delineation of boundaries for the nominated component sites, in relation to the way each of the sites contributes to the proposed Outstanding Universal Value of the overall series, the ICOMOS Panel would like to ask for a reconsideration of the boundaries for the following component sites:

#### *Legionary fortress, Vienna (ID 30)*

Although only 2% of the fortress has been nominated and less than 0.5% of the whole fortress, with civil settlements and cemeteries, the component site is said to reflect the importance of Roman lifestyles at the edge of the Empire. Such a small area cannot convey this wide perspective. Given the importance of the legionary fortresses as the main nodal points of the overall frontier, it is essential that sufficient is nominated to convey their scale, scope and overall value to the fortifications.

#### *Legionary fortress, Regensburg (ID 6)*

Only the fort has been nominated while the component site is said to reflect the fact that this was the only legionary fortress in the province of Raetia and its related civilian settlement was the largest in the province. The nominated component cluster is confined to the visible sections of the fortress defences which include the northern gate, north-eastern tower, eastern wall and south-eastern corner (although a drafting error seems to have excluded a small portion of the south wall at ID6i). Also included is a small portion of two barrack buildings surviving beneath the Niedermünster. The nomination excludes buried remains of the defences such as other sections of wall and ditches and also entirely excludes the civil settlement and associated cemeteries.

The nominated component site should include a sufficient proportion of the elements of associated extra-mural activities (*canabae*, cemeteries etc.) to express the value of the whole ensemble and not just the fortress.

#### *Budapest district 3 – Aquincum legionary fortress and canabae Hercules villa (70 a-c)*

The nominated site comprises the area enclosed by the wall of the civil town, the well houses, the amphitheatre, a watchtower on the banks of the Danube, and a few of the suburban buildings of the civilian town (including an inn to the south) as well as part of the northern, eastern and western suburbs.

The gladiator school, individual graveyards and cemetery, other suburban structures to the south, a pottery workshop complex and watchtower to the east and a stone building on the Római shore have not been included in the nominated area (but are located in the Buffer Zone).

If the Municipium is considered as a whole, together with its associated civil suburban settlements and associated structures, which all have a clear and dynamic relationship with the Municipium and contribute highly to the totality of the value represented by the whole site, then the exclusion of these are likely to compromise the integrity of the whole site.

It is requested that the area of the nominated component site be extended to include a sufficient proportion of suburban extra-mural features and structures in the civil town.

#### *Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)*

At these component sites, the interior of the military defences are located in the Buffer Zone rather than being included in the nominated component sites, which they should be.

#### *Rusovce - Gerulata (ID 32)*

The component site is said to reflect 'the entire gradual and long-term development of Roman fortification architecture in this section of the Danube limits from the beginning of its construction up to the building of the late-antique fortification in the post Valentinian period around 380 AD' – that is from the 1st to the end of the 4th century CE. What has been

nominated, though, only covers the fort's post-Valentinian construction stage (4th century AD) which consisted of a stone tower built into corner of the older fort, which is in the Buffer Zone.

The nominated component site should also include a sufficient proportion of the elements of associated extra-mural activities (so-called *vicus*, cemetery etc.) to express the totality of the values of the whole ensemble and not just the later fort / Watchtower / Burgos.

Nyergesújfalu Sánc-hegy - Crumerum (ID 49); Nagytétény-Campona (ID 73); Százhalombatta-Dunafüred - Matrica (ID 75a-b); Dunaújváros Öreghegy - Intercisa (ID 78 a-d); Ócsény Gábor-tanya - Alisca (ID 92)

At these sites, at least some of the extra-mural activity and associated features (the so-called *vicus* or military *vicus*) of the component sites are considered part of how these sites contribute to the proposed Outstanding Universal Value.

However, the area of extra-mural activity that has been included in the nominated sites is very limited and it is not clear whether this represents a sufficiently significant proportion of the elements necessary to convey the value of fort and extra-mural features.

It is requested that the delineation of these component sites be reviewed in order to establish whether this extends over a sufficient proportion of the extra-mural activity/features (*vicus* etc.) and if this is not the case, then the boundary should be revised accordingly to reflect adequately the integrity of the ensemble.

Bum-Bum kút - Ad Mures (ID 42); Dunabogdány Váradok-dűlő - Cirpi (ID 64); Szentendre Ulcisia (ID 68); Budapest XI kerület Albertfalva (ID 72); Budapest district 22 Nagytétény – Campona (ID 73); Kölked Hajlok-part – Altinum (ID 98)

These forts have been nominated as component sites without the inclusion of any related extra-mural activity or associated features. This is inconsistent with the approach adopted for the majority of nominated fort and *vicus* ensembles. The reasons for this inconsistency are not entirely clear and may relate not to principles of integrity but rather to administrative difficulties. In the case of Nagytétény – Campona, it appears to be related to the difficulties of creating a Buffer Zone beyond enlarged boundaries.

It is requested that boundaries of these component sites be reviewed to include a sufficient proportion of extra-mural activity so that the integrity of the fort / *vicus* ensemble is properly and consistently reflected. If this cannot be achieved, clear reasons should be put forward.

St Peter's church, Straubing (ID 7b)

The evidence for the extent of this late defended site is not strong. Excavations have been limited to small areas within the existing cemetery and only a small part of the northern defensive wall has been found. The defined extent of the component site appears to be conjectural.

It is requested that the site boundary for this component site be reviewed and consideration given to whether further investigation is necessary or whether 7b should be removed from the nomination in the absence of sufficient evidence to define its extent and nature.

Komárom-Szőny Brigetio (ID 45)

The boundaries of this component site should be reviewed to ensure that it encompasses the area of archaeological survival of the Fort and *canabae* – possible to the edge of the currently defined Buffer Zone (but excluding the oil refinery site).

Sibrik-domb – hillfort (ID 61)

The Fort ditch is apparently not included in the area of the component site. The area of the component site should be extended to include the whole of the fort ditch.

Dunaszekcső Halena – brick kilns (ID 97)

Definition of the component site relates to the attested presence of Roman structures defined by trial excavation, the spread of surface finds, and limited geophysical survey.

In the absence of detailed evidence for other related structures, it was not considered by the authorities appropriate to extend the area of the component site to include such potential evidence. However, this decision should be reconsidered either by simply including the area of potential in the nominated component site, or by carrying out a more extensive geophysical survey to establish whether this potential can be corroborated by firm evidence.

The modern road here coincides with the alignment of limes road so there is no need to extend either the boundary of the component site or the boundary of the Buffer Zone South beyond the road.

#### Temporary Forts Iža - Kelemantia (ID 46)

There is an issue of consistency in relation to the way that the two clusters of temporary forts have been nominated: the Brigetio ensemble of temporary camps ID 43a-n have been nominated, while the other set at Iža - Kelemantia is in the Buffer Zone.

As these temporary forts are seen as being exceptional to this part of the frontier, both sets of forts should be part of the nominated property. The ICOMOS Panel would like to request a reconsideration of the nomination approach for these particular component sites.

If the temporary camps of Iža - Kelemantia have a direct and dynamic relationship with the fort of Kelemantia and are considered critical to understand and appreciate the value of the fort (which appears to be the case), then they should be incorporated in the nominated component site of the fort. If they are considered to be separate but significant works of military architecture with a different function in their own right (as is the case in Hungary), then they should be nominated as a separate component site.

The ICOMOS Panel appreciates that there could be difficulties in providing a Buffer Zone if the temporary forts are nominated as one site, but would nevertheless requests that consideration is given to how the immediate setting could be protected.

There is a further issue in relation to whether each of the temporary forts is seen as a separate site or whether they are considered to be two clusters of inter-related forts. The Brigetio forts have been nominated individually and only 21 of the 34 examples known are nominated because these are the only ones that are firmly dated.

Ideally both sets of forts should be nominated as clusters to reflect their purpose and use. They are a significant archaeological landscape that were used by the Roman army to construct temporary camps at this point on the Danube. For the Brigetio forts, the entire ensembles should be grouped together either as a single nominated component site with a Buffer Zone that extends to all the interstices between the camps (where more discoveries are undoubtedly anticipated) or possibly as two larger groups connected by a single Buffer Zone.

The difficulty with nominating the temporary forts in Hungary as a cluster is understood. The ICOMOS Panel would nevertheless request that consideration is given to moving towards a cluster approach, even if this cannot be achieved in one step. The ICOMOS Panel would also request that consideration is given to including all the known temporary camps not just those that have been dated.

Furthermore, it is requested that the delineation of the Buffer Zone is reviewed so that it provides better protection to the whole of this extremely significant archaeological landscape.

#### **Buffer Zones**

A clear definition for the settings of the component sites and how these support the nominated property does not appear to have been basis for deciding how the immediate setting might be defined as Buffer Zones for all sites. As a result, there is considerable variation in the way in which Buffer Zones have been applied.

The ICOMOS Panel considers that there is a need for a defined coherent approach to the scope, purpose and delineation of Buffer Zones, in order to achieve Buffer Zones that better reflect their purpose of supporting the component sites, in terms of how they contribute to the proposed Outstanding Universal Value. The ICOMOS Panel would request that Buffer Zones at the following component sites are re-considered:

Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)

At these component sites, each element of the cluster has been assigned a separate Buffer Zone. At each location, the combined buffers cover the parts of the interior of the military defences which were not included in the nominated components. The fragmentation of the Buffer Zones appears to impose arbitrary divisions on unified monuments. (This is in contrast to Aquincum (ID70a-c) where the nominated elements of the fortress, *canabae* and amphitheatre are lie within a single widely defined Buffer Zone.)

In addition, whilst at Enns the associated civil settlement is in part included in the nominated site, the civil settlements associated with the forts at Wallsee and Zeiselmauer are not included in the nominated sites or the Buffer Zones as currently defined.

It is requested that the fragmented Buffer Zones be reviewed with a view to defining unitary Buffer Zones at each location.

Furthermore, at Wallsee and Zeiselmauer consideration should be given to extending the Buffer Zones to include the civil settlements associated with the respective forts.

Straubing Kastelle (ID 7 a-b)

Consider defining a Buffer Zone for the Ostkastel to include whole of civil settlement.

Künzing Amphitheater und vicus (ID 8)

Consider re-defining the Buffer Zone to include the remainder of the vicus.

Passau – Kastelle und Burqus (ID 9 a-c)

Consider re-defining Buffer Zones for all three component sites to include all of civil settlement at 9a and all defences at 9b and 9c.

Mautern Kastell (ID 24a-b)

Consider combining Buffer Zones into single zone defined by earlier fort walls plus a margin around. Also consider extending the Buffer Zone to include civil settlements.

Camuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31)

Consideration should be given to defining a Buffer Zone to protect the setting of the component site from further visual intrusion – as a wind farm adjacent to the southern boundary of the property has a substantial negative impact on the setting.

Abda (ID 37)

In places the Buffer Zone is directly adjacent or very close to the component site boundary – this does not provide a sufficiently wide band of protection around the component site.

The Buffer Zone should be extended in order to provide an adequate band of protection around the site.

Although deep ploughing is prohibited, and ploughing is restricted to a depth of 0.30 m, continued ploughing will degrade the slight topographic features that represent the line of the Limes road and the location of the watchtower. The protection for the Buffer Zone needs to be strengthened to prohibit any ploughing.

Nyergesújfalu Sánc-hegy - Crumerum (ID 49)

Review the Buffer Zone to protect key views and sight lines and consider extending it to the South West.

Pilismarót Kis-hegy Ad Herculeum (ID 56)

Consider extending the Buffer Zone to comprise the whole of the knoll - i.e. extended to edge of the encircling roads. And also consider extending the Buffer Zone and to include any wider area of extra-mural activity.

Gizellamajor – Fortlet (ID 58)

The Buffer Zone is very narrow along the western edge of the property (because of the way the plot boundaries are configured here). Consider extending the Buffer Zone to the West of the property – as to extend the area of protection.

#### Verőce Dunamező-dűlő, Solva 38 (ID 63)

The Buffer Zone for this bridgehead component site is restricted to a length of the river bank running West-North-West and East-South-East.

In analogous circumstances (cluster 67a-b) the Buffer Zone extends across the river to encompass the pair of bridgeheads. In the case of Component 63 only the bridgehead on the North bank of the Danube has been nominated; however, because of the transverse relationship with three other bridgeheads on this alignment across the Danube, perhaps consideration should be given to extending the Buffer Zone across the island to the South bank of the Danube, in order to include the assumed location of the three other bridgeheads in this protective zone.

It is recognised that if these are already identified as national archaeological monuments this may not be considered necessary strictly on ground of protection of the sites, but it would nevertheless be appropriate on grounds of integrity in recognising the links between sites.

#### Various other component sites in Hungary

In most component sites in Hungary, the Buffer Zones have been defined as extending to the boundary of the property lots (on the cadastre map) that contains any element of the nominated component site. As currently constituted, the nominated component sites comprise 2,915 separate plots, and it is easy to understand why the pragmatic approach to the delineation of Buffer Zones has been used.

As delineated though the Buffer Zones generally do not present a coherent approach to protecting the setting of the component sites and supporting their contribution to the proposed Outstanding Universal Value.

The ICOMOS Panel would request that the delineation of Buffer Zones should be reviewed, and where appropriate, their boundaries revised to provide a more logical and effective zone of protection around the relevant nominated component site.

#### Regensburg (ID6) and Vienna (ID30)

For sites that fall within existing inscribed properties, no Buffer Zones have been provided. These are the legionary fortresses at Regensburg (ID6) and Vienna (ID30) as they are sited within the Regensburg Altstadt with Stadtamhof and the Historic Centre of Vienna World Heritage Sites respectively. The reason for not delineating Buffer Zones was that at Regensburg 'the Nominated property is situated in the existing World Heritage Site Old Town of Regensburg with Stadtamhof which has a Buffer Zone in its own right', while at Vienna this was 'due to the built-up vicinity of the component part'. In both cities, the survival of Roman remains even in densely built urban areas has been demonstrated by excavation on many occasions in recent years. The potential benefits of a Buffer Zone in defining the potential areas of archaeological interest associated with the components would seem clear for both component sites. Equally, the function of a Buffer Zone defined for one property cannot readily protect a second property defined for an entirely different reason as Buffer Zones should support the attributes of Outstanding Universal Value in the component sites to which they relate. Thus, the ICOMOS Panel would be pleased if the States Parties could consider to define appropriate Buffer Zones for these two properties related to Roman remains.

#### **Links to the Danube**

The River Danube was the Roman Frontier and joins together all the nominated structures, many of which were sited strategically in relation to its shores and were meant to be visible from the river, long views from watchtowers, forts, and hillforts: this contribute to their authenticity. Although it is fully appreciated that the river has moved its course since Roman times and that its exact position when the frontier was active is not fully known, the ICOMOS Panel does consider that there is a need to analyse precisely where views of the river do exist, or could exist if vegetation were differently managed, and to strengthen the protection and management of such views between sites and the River Danube, and between neighbouring sites where it is known that there was inter-visibility, either by extending Buffer Zones or defining protected views.

The ICOMOS Panel would like to request that details of such a project be provided, with an approximate timeframe indicated for when it might be achieved. Furthermore, it would be helpful to understand how research into the Roman course of the river might be supported and undertaken.

### **Protection and Management**

The ICOMOS Panel considers that legal protection would need to be put in place for the component sites at Carnuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31) to protect its cultural attributes. While it is appreciated that this component site benefits from protection for its natural aspects, this is not adequate to ensure its long-term protection as part of an inscribed serial property.

In advance of the development of management plans for component sites in Hungary, summary conservation statements for each nominated component should be developed. These should be simple structured statements for each nominated component site sets out the fundamental conservation and management issues for that component in a practical format. Such simple, summary conservation statements need to be compiled for each nominated component site prior to inscription.

For components sites in Austria and Germany (Bavaria), the ICOMOS Panel considers that summary action plan statements need to be developed, before inscription, for each nominated component site to complement the Management Plan and make it more site specific.

We look forward to your responses to these points, which will be of great help in our evaluation process.

We would be grateful if you could provide ICOMOS and the World Heritage Centre with the above information **by 28 February 2019 at the latest**, the deadline set out in paragraph 148 of the Operational Guidelines for supplementary information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any supplementary information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation process.

Yours faithfully,



Gwenaëlle Bourdin  
Director  
ICOMOS Evaluation Unit

Copy to      Bavarian State Ministry for Education and Culture, Science and Art  
                 Bavarian State Office for the Preservation of Monuments  
                 Permanent Delegation of Austria to UNESCO  
                 Austrian Federal Chancellery - Section II (Art and Culture) –  
                 Department II / 4a UNESCO World Heritage  
                 Permanent Delegation of Hungary to UNESCO  
                 Hungarian Prime Ministry  
                 Limes World Heritage Consciousness - Budavári Real Estate Development and Operations Ltd.  
                 Scientific Directorate  
                 Permanent Delegation of Slovakia to UNESCO  
                 Monuments Board of the Slovak Republic  
                 UNESCO World Heritage Centre

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/AS/1608/IR

Charenton-le-Pont, 21 December 2018

Ms Gabriella Palos  
Chargée d'Affaires a.i  
Permanent Delegation of Hungary to UNESCO  
140, Avenue Victor Hugo  
75116 Paris

World Heritage List 2019

**Frontiers of the Roman Empire – The Danube Limes (Austria, Germany, Hungary, Slovakia) –  
Interim report and additional information request**

Dear Ambassador,

As prescribed by the revised Operational Guidelines for the Implementation of the World Heritage Convention and its Annex 6, the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2019. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation process.

The ICOMOS technical evaluation mission to "Frontiers of the Roman Empire – The Danube Limes" was carried out by David Lakin (United Kingdom) and Adrian Olivier (United Kingdom) in September-October 2018. The mission experts highly appreciated the availabilities and support provided by the experts for the organization and implementation of the mission.

At the end of November 2018, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2019. The additional information provided by the States Parties, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2019.

We thank you for the availability of your Delegation to the meeting held on Saturday 24 November 2018 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the discussions at the ICOMOS Panel meeting. Following the completion of their deliberations, the ICOMOS Panel has identified areas where it considers further information is needed.

Therefore, we would be pleased if the States Parties could consider the following points:

The ICOMOS Panel considered that the level of detail provided in the Nomination dossier for each of the component sites is impressive, including how each contributes to the proposed Outstanding Universal Value. The Nomination dossier also shows clearly how the four States Parties have worked closely together in the preparation of the Nomination, and that despite inevitable differences in national perspectives and management approaches, there is a good degree of coherence. The ICOMOS Panel considered, nonetheless, that there are a few, important areas where further work would be needed. These relate mainly to the delineation of some component sites and Buffer Zones, to the relationship between the component sites and the River Danube, and to some aspects of protection and management.

### **Boundaries of nominated components in relation to their contribution to the proposed Outstanding Universal Value**

For a small number of the component sites, the ICOMOS Panel considers that there are some weaknesses where the portion of a component site that has been nominated does not have the capacity to convey its contribution to the proposed Outstanding Universal Value, as set out in the Nomination dossier, mostly for the reason that the boundary has been drawn too tightly.

In order to achieve a coherent approach to the delineation of boundaries for the nominated component sites, in relation to the way each of the sites contributes to the proposed Outstanding Universal Value of the overall series, the ICOMOS Panel would like to ask for a reconsideration of the boundaries for the following component sites:

#### **Legionary fortress, Vienna (ID 30)**

Although only 2% of the fortress has been nominated and less than 0.5% of the whole fortress, with civil settlements and cemeteries, the component site is said to reflect the importance of Roman lifestyles at the edge of the Empire. Such a small area cannot convey this wide perspective. Given the importance of the legionary fortresses as the main nodal points of the overall frontier, it is essential that sufficient is nominated to convey their scale, scope and overall value to the fortifications.

#### **Legionary fortress, Regensburg (ID 6)**

Only the fort has been nominated while the component site is said to reflect the fact that this was the only legionary fortress in the province of Raetia and its related civilian settlement was the largest in the province. The nominated component cluster is confined to the visible sections of the fortress defences which include the northern gate, north-eastern tower, eastern wall and south-eastern corner (although a drafting error seems to have excluded a small portion of the south wall at ID6i). Also included is a small portion of two barrack buildings surviving beneath the Niedermünster. The nomination excludes buried remains of the defences such as other sections of wall and ditches and also entirely excludes the civil settlement and associated cemeteries.

The nominated component site should include a sufficient proportion of the elements of associated extra-mural activities (*canabae*, cemeteries etc.) to express the value of the whole ensemble and not just the fortress.

#### **Budapest district 3 – Aquincum legionary fortress and *canabae* Hercules villa (70 a-c)**

The nominated site comprises the area enclosed by the wall of the civil town, the well houses, the amphitheatre, a watchtower on the banks of the Danube, and a few of the suburban buildings of the civilian town (including an inn to the south) as well as part of the northern, eastern and western suburbs.

The gladiator school, individual graveyards and cemetery, other suburban structures to the south, a pottery workshop complex and watchtower to the east and a stone building on the Római shore have not been included in the nominated area (but are located in the Buffer Zone).

If the Municipium is considered as a whole, together with its associated civil suburban settlements and associated structures, which all have a clear and dynamic relationship with the Municipium and contribute highly to the totality of the value represented by the whole site, then the exclusion of these are likely to compromise the integrity of the whole site.

It is requested that the area of the nominated component site be extended to include a sufficient proportion of suburban extra-mural features and structures in the civil town.

#### **Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)**

At these component sites, the interior of the military defences are located in the Buffer Zone rather than being included in the nominated component sites, which they should be.

#### **Rusovce - Gerulata (ID 32)**

The component site is said to reflect 'the entire gradual and long-term development of Roman fortification architecture in this section of the Danube limits from the beginning of its construction up to the building of the late-antique fortification in the post-Valentinian period around 380 AD' – that is from the 1st to the end of the 4th century CE. What has been



nominated, though, only covers the fort's post-Valentinian construction stage (4th century AD) which consisted of a stone tower built into corner of the older fort, which is in the Buffer Zone.

The nominated component site should also include a sufficient proportion of the elements of associated extra-mural activities (so-called *vicus*, cemetery etc.) to express the totality of the values of the whole ensemble and not just the later fort / Watchtower / Burgos.

Nyergesújfalu Sánc-hegy - Crumerum (ID 49); Nagytétény-Campona (ID 73); Százhalombatta-Dunafüred - Matrica (ID 75a-b); Dunaújváros Öreghegy - Intercisa (ID 78 a-d); Ócsény Gábor-tanya - Alisca (ID 92)

At these sites, at least some of the extra-mural activity and associated features (the so-called *vicus* or military *vicus*) of the component sites are considered part of how these sites contribute to the proposed Outstanding Universal Value.

However, the area of extra-mural activity that has been included in the nominated sites is very limited and it is not clear whether this represents a sufficiently significant proportion of the elements necessary to convey the value of fort and extra-mural features.

It is requested that the delineation of these component sites be reviewed in order to establish whether this extends over a sufficient proportion of the extra-mural activity/features (*vicus* etc.) and if this is not the case, then the boundary should be revised accordingly to reflect adequately the integrity of the ensemble.

Bum-Bum kút - Ad Mures (ID 42); Dunabogdány Váradok-dűlő - Cirpi (ID 64); Szentendre Ulcisia (ID 68); Budapest XI kerület Albertfalva (ID 72); Budapest district 22 Nagytétény – Campona (ID 73); Kölked Hajlok-part – Altinum (ID 98)

These forts have been nominated as component sites without the inclusion of any related extra-mural activity or associated features. This is inconsistent with the approach adopted for the majority of nominated fort and *vicus* ensembles. The reasons for this inconsistency are not entirely clear and may relate not to principles of integrity but rather to administrative difficulties. In the case of Nagytétény – Campona, it appears to be related to the difficulties of creating a Buffer Zone beyond enlarged boundaries.

It is requested that boundaries of these component sites be reviewed to include a sufficient proportion of extra-mural activity so that the integrity of the fort / *vicus* ensemble is properly and consistently reflected. If this cannot be achieved, clear reasons should be put forward.

St Peter's church, Straubing (ID 7b)

The evidence for the extent of this late defended site is not strong. Excavations have been limited to small areas within the existing cemetery and only a small part of the northern defensive wall has been found. The defined extent of the component site appears to be conjectural.

It is requested that the site boundary for this component site be reviewed and consideration given to whether further investigation is necessary or whether 7b should be removed from the nomination in the absence of sufficient evidence to define its extent and nature.

Komárom-Szőny Brigetio (ID 45)

The boundaries of this component site should be reviewed to ensure that it encompasses the area of archaeological survival of the Fort and *canabae* – possible to the edge of the currently defined Buffer Zone (but excluding the oil refinery site).

Sibrik-domb – hillfort (ID 61)

The Fort ditch is apparently not included in the area of the component site. The area of the component site should be extended to include the whole of the fort ditch.

Dunaszekcső Halena – brick kilns (ID 97)

Definition of the component site relates to the attested presence of Roman structures defined by trial excavation, the spread of surface finds, and limited geophysical survey.

In the absence of detailed evidence for other related structures, it was not considered by the authorities appropriate to extend the area of the component site to include such potential evidence. However, this decision should be reconsidered either by simply including the area of potential in the nominated component site, or by carrying out a more extensive geophysical survey to establish whether this potential can be corroborated by firm evidence.

The modern road here coincides with the alignment of limes road so there is no need to extend either the boundary of the component site or the boundary of the Buffer Zone South beyond the road.

#### Temporary Forts Iža - Kelemantia (ID 46)

There is an issue of consistency in relation to the way that the two clusters of temporary forts have been nominated: the Brigetio ensemble of temporary camps ID 43a-n have been nominated, while the other set at Iža - Kelemantia is in the Buffer Zone.

As these temporary forts are seen as being exceptional to this part of the frontier, both sets of forts should be part of the nominated property. The ICOMOS Panel would like to request a reconsideration of the nomination approach for these particular component sites.

If the temporary camps of Iža - Kelemantia have a direct and dynamic relationship with the fort of Kelemantia and are considered critical to understand and appreciate the value of the fort (which appears to be the case), then they should be incorporated in the nominated component site of the fort. If they are considered to be separate but significant works of military architecture with a different function in their own right (as is the case in Hungary), then they should be nominated as a separate component site.

The ICOMOS Panel appreciates that there could be difficulties in providing a Buffer Zone if the temporary forts are nominated as one site, but would nevertheless requests that consideration is given to how the immediate setting could be protected.

There is a further issue in relation to whether each of the temporary forts is seen as a separate site or whether they are considered to be two clusters of inter-related forts. The Brigetio forts have been nominated individually and only 21 of the 34 examples known are nominated because these are the only ones that are firmly dated.

Ideally both sets of forts should be nominated as clusters to reflect their purpose and use. They are a significant archaeological landscape that were used by the Roman army to construct temporary camps at this point on the Danube. For the Brigetio forts, the entire ensembles should be grouped together either as a single nominated component site with a Buffer Zone that extends to all the interstices between the camps (where more discoveries are undoubtedly anticipated) or possibly as two larger groups connected by a single Buffer Zone.

The difficulty with nominating the temporary forts in Hungary as a cluster is understood. The ICOMOS Panel would nevertheless request that consideration is given to moving towards a cluster approach, even if this cannot be achieved in one step. The ICOMOS Panel would also request that consideration is given to including all the known temporary camps not just those that have been dated.

Furthermore, it is requested that the delineation of the Buffer Zone is reviewed so that it provides better protection to the whole of this extremely significant archaeological landscape.

#### **Buffer Zones**

A clear definition for the settings of the component sites and how these support the nominated property does not appear to have been basis for deciding how the immediate setting might be defined as Buffer Zones for all sites. As a result, there is considerable variation in the way in which Buffer Zones have been applied.

The ICOMOS Panel considers that there is a need for a defined coherent approach to the scope, purpose and delineation of Buffer Zones, in order to achieve Buffer Zones that better reflect their purpose of supporting the component sites, in terms of how they contribute to the proposed Outstanding Universal Value. The ICOMOS Panel would request that Buffer Zones at the following component sites are re-considered:

Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)

At these component sites, each element of the cluster has been assigned a separate Buffer Zone. At each location, the combined buffers cover the parts of the interior of the military defences which were not included in the nominated components. The fragmentation of the Buffer Zones appears to impose arbitrary divisions on unified monuments. (This is in contrast to Aquincum (ID70a-c) where the nominated elements of the fortress, *canabae* and amphitheatre are lie within a single widely defined Buffer Zone.)

In addition, whilst at Enns the associated civil settlement is in part included in the nominated site, the civil settlements associated with the forts at Wallsee and Zeiselmauer are not included in the nominated sites or the Buffer Zones as currently defined.

It is requested that the fragmented Buffer Zones be reviewed with a view to defining unitary Buffer Zones at each location.

Furthermore, at Wallsee and Zeiselmauer consideration should be given to extending the Buffer Zones to include the civil settlements associated with the respective forts.

Straubing Kastelle (ID 7 a-b)

Consider defining a Buffer Zone for the Ostkastel to include whole of civil settlement.

Künzing Amphitheater und vicus (ID 8)

Consider re-defining the Buffer Zone to include the remainder of the vicus.

Passau – Kastelle und Burgus (ID 9 a-c)

Consider re-defining Buffer Zones for all three component sites to include all of civil settlement at 9a and all defences at 9b and 9c.

Mautern Kastell (ID 24a-b)

Consider combining Buffer Zones into single zone defined by earlier fort walls plus a margin around. Also consider extending the Buffer Zone to include civil settlements.

Camuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31)

Consideration should be given to defining a Buffer Zone to protect the setting of the component site from further visual intrusion – as a wind farm adjacent to the southern boundary of the property has a substantial negative impact on the setting.

Abda (ID 37)

In places the Buffer Zone is directly adjacent or very close to the component site boundary – this does not provide a sufficiently wide band of protection around the component site.

The Buffer Zone should be extended in order to provide an adequate band of protection around the site.

Although deep ploughing is prohibited, and ploughing is restricted to a depth of 0.30 m, continued ploughing will degrade the slight topographic features that represent the line of the Limes road and the location of the watchtower. The protection for the Buffer Zone needs to be strengthened to prohibit any ploughing.

Nyerkesújfalu Sánc-hegy - Crumerum (ID 49)

Review the Buffer Zone to protect key views and sight lines and consider extending it to the South West.

Pilismarót Kis-hegy Ad Herculem (ID 56)

Consider extending the Buffer Zone to comprise the whole of the knoll - i.e. extended to edge of the encircling roads. And also consider extending the Buffer Zone and to include any wider area of extra-mural activity.

Gizellamajor – Fortlet (ID 58)

The Buffer Zone is very narrow along the western edge of the property (because of the way the plot boundaries are configured here). Consider extending the Buffer Zone to the West of the property – as to extend the area of protection.

#### Verőce Dunamező-dűlő, Solva 38 (ID 63)

The Buffer Zone for this bridgehead component site is restricted to a length of the river bank running West-North-West and East-South-East.

In analogous circumstances (cluster 67a-b) the Buffer Zone extends across the river to encompass the pair of bridgeheads. In the case of Component 63 only the bridgehead on the North bank of the Danube has been nominated; however, because of the transverse relationship with three other bridgeheads on this alignment across the Danube, perhaps consideration should be given to extending the Buffer Zone across the island to the South bank of the Danube, in order to include the assumed location of the three other bridgeheads in this protective zone.

It is recognised that if these are already identified as national archaeological monuments this may not be considered necessary strictly on ground of protection of the sites, but it would nevertheless be appropriate on grounds of integrity in recognising the links between sites.

#### Various other component sites in Hungary

In most component sites in Hungary, the Buffer Zones have been defined as extending to the boundary of the property lots (on the cadastre map) that contains any element of the nominated component site. As currently constituted, the nominated component sites comprise 2,915 separate plots, and it is easy to understand why the pragmatic approach to the delineation of Buffer Zones has been used.

As delineated though the Buffer Zones generally do not present a coherent approach to protecting the setting of the component sites and supporting their contribution to the proposed Outstanding Universal Value.

The ICOMOS Panel would request that the delineation of Buffer Zones should be reviewed, and where appropriate, their boundaries revised to provide a more logical and effective zone of protection around the relevant nominated component site.

#### Regensburg (ID6) and Vienna (ID30)

For sites that fall within existing inscribed properties, no Buffer Zones have been provided. These are the legionary fortresses at Regensburg (ID6) and Vienna (ID30) as they are sited within the Regensburg Altstadt with Stadtamhof and the Historic Centre of Vienna World Heritage Sites respectively. The reason for not delineating Buffer Zones was that at Regensburg 'the Nominated property is situated in the existing World Heritage Site Old Town of Regensburg with Stadtamhof which has a Buffer Zone in its own right', while at Vienna this was 'due to the built-up vicinity of the component part'. In both cities, the survival of Roman remains even in densely built urban areas has been demonstrated by excavation on many occasions in recent years. The potential benefits of a Buffer Zone in defining the potential areas of archaeological interest associated with the components would seem clear for both component sites. Equally, the function of a Buffer Zone defined for one property cannot readily protect a second property defined for an entirely different reason as Buffer Zones should support the attributes of Outstanding Universal Value in the component sites to which they relate. Thus, the ICOMOS Panel would be please if the States Parties could consider to define appropriate Buffer Zones for these two properties related to Roman remains.

#### **Links to the Danube**

The River Danube was the Roman Frontier and joins together all the nominated structures, many of which were sited strategically in relation to its shores and were meant to be visible from the river, long views from watchtowers, forts, and hillforts: this contribute to their authenticity. Although it is fully appreciated that the river has moved its course since Roman times and that its exact position when the frontier was active is not fully known, the ICOMOS Panel does consider that there is a need to analyse precisely where views of the river do exist, or could exist if vegetation were differently managed, and to strengthen the protection and management of such views between sites and the River Danube, and between neighbouring sites where it is known that there was inter-visibility, either by extending Buffer Zones or defining protected views.

The ICOMOS Panel would like to request that details of such a project be provided, with an approximate timeframe indicated for when it might be achieved. Furthermore, it would be helpful to understand how research into the Roman course of the river might be supported and undertaken.

### **Protection and Management**

The ICOMOS Panel considers that legal protection would need to be put in place for the component sites at Carnuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31) to protect its cultural attributes. While it is appreciated that this component site benefits from protection for its natural aspects, this is not adequate to ensure its long-term protection as part of an inscribed serial property.

In advance of the development of management plans for component sites in Hungary, summary conservation statements for each nominated component should be developed. These should be simple structured statements for each nominated component site sets out the fundamental conservation and management issues for that component in a practical format. Such simple, summary conservation statements need to be compiled for each nominated component site prior to inscription.

For components sites in Austria and Germany (Bavaria), the ICOMOS Panel considers that summary action plan statements need to be developed, before inscription, for each nominated component site to complement the Management Plan and make it more site specific.

We look forward to your responses to these points, which will be of great help in our evaluation process.

We would be grateful if you could provide ICOMOS and the World Heritage Centre with the above information **by 28 February 2019 at the latest**, the deadline set out in paragraph 148 of the Operational Guidelines for supplementary information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any supplementary information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation process.

Yours faithfully,



Gwenaëlle Bourdin  
Director  
ICOMOS Evaluation Unit

Copy to

- Hungarian Prime Ministry
- Limes World Heritage Consciousness - Budavári Real Estate Development and Operations Ltd.
- Scientific Directorate
- Permanent Delegation of Austria to UNESCO
- Austrian Federal Chancellery - Section II (Art and Culture) –
- Department II / 4a UNESCO World Heritage
- Permanent Delegation of Germany to UNESCO
- Bavarian State Ministry for Education and Culture, Science and Art
- Bavarian State Office for the Preservation of Monuments
- Permanent Delegation of Slovakia to UNESCO
- Monuments Board of the Slovak Republic
- UNESCO World Heritage Centre

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/AS/1608/IR

Charenton-le-Pont, 21 December 2018

H. E. Mr Igor Grexa  
Permanent Delegation of Slovakia to UNESCO  
Maison de l'UNESCO  
1, rue Miollis  
75732 Paris CEDEX 15

World Heritage List 2019

**Frontiers of the Roman Empire – The Danube Limes (Austria, Germany, Hungary, Slovakia) –  
Interim report and additional information request**

Dear Ambassador,

As prescribed by the revised Operational Guidelines for the Implementation of the World Heritage Convention and its Annex 6, the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2019. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation process.

The ICOMOS technical evaluation mission to “Frontiers of the Roman Empire – The Danube Limes” was carried out by David Lakin (United Kingdom) and Adrian Olivier (United Kingdom) in September-October 2018. The mission experts highly appreciated the availabilities and support provided by the experts for the organization and implementation of the mission.

At the end of November 2018, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2019. The additional information provided by the States Parties, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2019.

We thank you for the availability of your Delegation to the meeting held on Saturday 24 November 2018 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the discussions at the ICOMOS Panel meeting. Following the completion of their deliberations, the ICOMOS Panel has identified areas where it considers further information is needed.

Therefore, we would be pleased if the States Parties could consider the following points:

The ICOMOS Panel considered that the level of detail provided in the Nomination dossier for each of the component sites is impressive, including how each contributes to the proposed Outstanding Universal Value. The Nomination dossier also shows clearly how the four States Parties have worked closely together in the preparation of the Nomination, and that despite inevitable differences in national perspectives and management approaches, there is a good degree of coherence. The ICOMOS Panel considered, nonetheless, that there are a few, important areas where further work would be needed. These relate mainly to the delineation of some component sites and Buffer Zones, to the relationship between the component sites and the River Danube, and to some aspects of protection and management.

### **Boundaries of nominated components in relation to their contribution to the proposed Outstanding Universal Value**

For a small number of the component sites, the ICOMOS Panel considers that there are some weaknesses where the portion of a component site that has been nominated does not have the capacity to convey its contribution to the proposed Outstanding Universal Value, as set out in the Nomination dossier, mostly for the reason that the boundary has been drawn too tightly.

In order to achieve a coherent approach to the delineation of boundaries for the nominated component sites, in relation to the way each of the sites contributes to the proposed Outstanding Universal Value of the overall series, the ICOMOS Panel would like to ask for a reconsideration of the boundaries for the following component sites:

#### *Legionary fortress, Vienna (ID 30)*

Although only 2% of the fortress has been nominated and less than 0.5% of the whole fortress, with civil settlements and cemeteries, the component site is said to reflect the importance of Roman lifestyles at the edge of the Empire. Such a small area cannot convey this wide perspective. Given the importance of the legionary fortresses as the main nodal points of the overall frontier, it is essential that sufficient is nominated to convey their scale, scope and overall value to the fortifications.

#### *Legionary fortress, Regensburg (ID 6)*

Only the fort has been nominated while the component site is said to reflect the fact that this was the only legionary fortress in the province of Raetia and its related civilian settlement was the largest in the province. The nominated component cluster is confined to the visible sections of the fortress defences which include the northern gate, north-eastern tower, eastern wall and south-eastern corner (although a drafting error seems to have excluded a small portion of the south wall at ID6i). Also included is a small portion of two barrack buildings surviving beneath the Niedermünster. The nomination excludes buried remains of the defences such as other sections of wall and ditches and also entirely excludes the civil settlement and associated cemeteries.

The nominated component site should include a sufficient proportion of the elements of associated extra-mural activities (*canabae*, cemeteries etc.) to express the value of the whole ensemble and not just the fortress.

#### *Budapest district 3 – Aquincum legionary fortress and canabae Hercules villa (70 a-c)*

The nominated site comprises the area enclosed by the wall of the civil town, the well houses, the amphitheatre, a watchtower on the banks of the Danube, and a few of the suburban buildings of the civilian town (including an inn to the south) as well as part of the northern, eastern and western suburbs.

The gladiator school, individual graveyards and cemetery, other suburban structures to the south, a pottery workshop complex and watchtower to the east and a stone building on the Római shore have not been included in the nominated area (but are located in the Buffer Zone).

If the Municipium is considered as a whole, together with its associated civil suburban settlements and associated structures, which all have a clear and dynamic relationship with the Municipium and contribute highly to the totality of the value represented by the whole site, then the exclusion of these are likely to compromise the integrity of the whole site.

It is requested that the area of the nominated component site be extended to include a sufficient proportion of suburban extra-mural features and structures in the civil town.

#### *Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)*

At these component sites, the interior of the military defences are located in the Buffer Zone rather than being included in the nominated component sites, which they should be.

#### *Rusovce - Gerulata (ID 32)*

The component site is said to reflect 'the entire gradual and long-term development of Roman fortification architecture in this section of the Danube limits from the beginning of its construction up to the building of the late-antic fortification in the post Valentinian period around 380 AD' – that is from the 1st to the end of the 4th century CE. What has been

nominated, though, only covers the fort's post-Valentinian construction stage (4th century AD) which consisted of a stone tower built into corner of the older fort, which is in the Buffer Zone.

The nominated component site should also include a sufficient proportion of the elements of associated extra-mural activities (so-called *vicus*, cemetery etc.) to express the totality of the values of the whole ensemble and not just the later fort / Watchtower / Burgos.

Nyergesújfalu Sánc-hegy - Crumerum (ID 49); Nagytétény-Campona (ID 73); Százhalombatta-Dunafüred - Matrica (ID 75a-b); Dunaújváros Öreghegy - Intercisa (ID 78 a-d); Ócsény Gábor-tanya - Alisca (ID 92)

At these sites, at least some of the extra-mural activity and associated features (the so-called *vicus* or military *vicus*) of the component sites are considered part of how these sites contribute to the proposed Outstanding Universal Value.

However, the area of extra-mural activity that has been included in the nominated sites is very limited and it is not clear whether this represents a sufficiently significant proportion of the elements necessary to convey the value of fort and extra-mural features.

It is requested that the delineation of these component sites be reviewed in order to establish whether this extends over a sufficient proportion of the extra-mural activity/features (*vicus* etc.) and if this is not the case, then the boundary should be revised accordingly to reflect adequately the integrity of the ensemble.

Bum-Bum kút - Ad Mures (ID 42); Dunabogdány Váradok-dűlő - Cirpi (ID 64); Szentendre Ulcisia (ID 68); Budapest XI kerület Albertfalva (ID 72); Budapest district 22 Nagytétény – Campona (ID 73); Kölked Hajlok-part – Altinum (ID 98)

These forts have been nominated as component sites without the inclusion of any related extra-mural activity or associated features. This is inconsistent with the approach adopted for the majority of nominated fort and *vicus* ensembles. The reasons for this inconsistency are not entirely clear and may relate not to principles of integrity but rather to administrative difficulties. In the case of Nagytétény – Campona, it appears to be related to the difficulties of creating a Buffer Zone beyond enlarged boundaries.

It is requested that boundaries of these component sites be reviewed to include a sufficient proportion of extra-mural activity so that the integrity of the fort / *vicus* ensemble is properly and consistently reflected. If this cannot be achieved, clear reasons should be put forward.

St Peter's church, Straubing (ID 7b)

The evidence for the extent of this late defended site is not strong. Excavations have been limited to small areas within the existing cemetery and only a small part of the northern defensive wall has been found. The defined extent of the component site appears to be conjectural.

It is requested that the site boundary for this component site be reviewed and consideration given to whether further investigation is necessary or whether 7b should be removed from the nomination in the absence of sufficient evidence to define its extent and nature.

Komárom-Szőny Brigetio (ID 45)

The boundaries of this component site should be reviewed to ensure that it encompasses the area of archaeological survival of the Fort and *canabae* – possible to the edge of the currently defined Buffer Zone (but excluding the oil refinery site).

Sibrik-domb – hillfort (ID 61)

The Fort ditch is apparently not included in the area of the component site. The area of the component site should be extended to include the whole of the fort ditch.

Dunaszekcső Halena – brick kilns (ID 97)

Definition of the component site relates to the attested presence of Roman structures defined by trial excavation, the spread of surface finds, and limited geophysical survey.



In the absence of detailed evidence for other related structures, it was not considered by the authorities appropriate to extend the area of the component site to include such potential evidence. However, this decision should be reconsidered either by simply including the area of potential in the nominated component site, or by carrying out a more extensive geophysical survey to establish whether this potential can be corroborated by firm evidence.

The modern road here coincides with the alignment of limes road so there is no need to extend either the boundary of the component site or the boundary of the Buffer Zone South beyond the road.

#### Temporary Forts Iža - Kelemantia (ID 46)

There is an issue of consistency in relation to the way that the two clusters of temporary forts have been nominated: the Brigetio ensemble of temporary camps ID 43a-n have been nominated, while the other set at Iža - Kelemantia is in the Buffer Zone.

As these temporary forts are seen as being exceptional to this part of the frontier, both sets of forts should be part of the nominated property. The ICOMOS Panel would like to request a reconsideration of the nomination approach for these particular component sites.

If the temporary camps of Iža - Kelemantia have a direct and dynamic relationship with the fort of Kelemantia and are considered critical to understand and appreciate the value of the fort (which appears to be the case), then they should be incorporated in the nominated component site of the fort. If they are considered to be separate but significant works of military architecture with a different function in their own right (as is the case in Hungary), then they should be nominated as a separate component site.

The ICOMOS Panel appreciates that there could be difficulties in providing a Buffer Zone if the temporary forts are nominated as one site, but would nevertheless requests that consideration is given to how the immediate setting could be protected.

There is a further issue in relation to whether each of the temporary forts is seen as a separate site or whether they are considered to be two clusters of inter-related forts. The Brigetio forts have been nominated individually and only 21 of the 34 examples known are nominated because these are the only ones that are firmly dated.

Ideally both sets of forts should be nominated as clusters to reflect their purpose and use. They are a significant archaeological landscape that were used by the Roman army to construct temporary camps at this point on the Danube. For the Brigetio forts, the entire ensembles should be grouped together either as a single nominated component site with a Buffer Zone that extends to all the interstices between the camps (where more discoveries are undoubtedly anticipated) or possibly as two larger groups connected by a single Buffer Zone.

The difficulty with nominating the temporary forts in Hungary as a cluster is understood. The ICOMOS Panel would nevertheless request that consideration is given to moving towards a cluster approach, even if this cannot be achieved in one step. The ICOMOS Panel would also request that consideration is given to including all the known temporary camps not just those that have been dated.

Furthermore, it is requested that the delineation of the Buffer Zone is reviewed so that it provides better protection to the whole of this extremely significant archaeological landscape.

#### **Buffer Zones**

A clear definition for the settings of the component sites and how these support the nominated property does not appear to have been basis for deciding how the immediate setting might be defined as Buffer Zones for all sites. As a result, there is considerable variation in the way in which Buffer Zones have been applied.

The ICOMOS Panel considers that there is a need for a defined coherent approach to the scope, purpose and delineation of Buffer Zones, in order to achieve Buffer Zones that better reflect their purpose of supporting the component sites, in terms of how they contribute to the proposed Outstanding Universal Value. The ICOMOS Panel would request that Buffer Zones at the following component sites are re-considered:

Enns legionary fortress (ID14f-g), Wallsee (ID16a-b) and Zeiselmauer (28a-d)

At these component sites, each element of the cluster has been assigned a separate Buffer Zone. At each location, the combined buffers cover the parts of the interior of the military defences which were not included in the nominated components. The fragmentation of the Buffer Zones appears to impose arbitrary divisions on unified monuments. (This is in contrast to Aquincum (ID70a-c) where the nominated elements of the fortress, *canabae* and amphitheatre are lie within a single widely defined Buffer Zone.)

In addition, whilst at Enns the associated civil settlement is in part included in the nominated site, the civil settlements associated with the forts at Wallsee and Zeiselmauer are not included in the nominated sites or the Buffer Zones as currently defined.

It is requested that the fragmented Buffer Zones be reviewed with a view to defining unitary Buffer Zones at each location.

Furthermore, at Wallsee and Zeiselmauer consideration should be given to extending the Buffer Zones to include the civil settlements associated with the respective forts.

Straubing Kastelle (ID 7 a-b)

Consider defining a Buffer Zone for the Ostkastel to include whole of civil settlement.

Künzing Amphitheater und vicus (ID 8)

Consider re-defining the Buffer Zone to include the remainder of the vicus.

Passau – Kastelle und Burqus (ID 9 a-c)

Consider re-defining Buffer Zones for all three component sites to include all of civil settlement at 9a and all defences at 9b and 9c.

Mautern Kastell (ID 24a-b)

Consider combining Buffer Zones into single zone defined by earlier fort walls plus a margin around. Also consider extending the Buffer Zone to include civil settlements.

Camuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31)

Consideration should be given to defining a Buffer Zone to protect the setting of the component site from further visual intrusion – as a wind farm adjacent to the southern boundary of the property has a substantial negative impact on the setting.

Abda (ID 37)

In places the Buffer Zone is directly adjacent or very close to the component site boundary – this does not provide a sufficiently wide band of protection around the component site.

The Buffer Zone should be extended in order to provide an adequate band of protection around the site.

Although deep ploughing is prohibited, and ploughing is restricted to a depth of 0.30 m, continued ploughing will degrade the slight topographic features that represent the line of the Limes road and the location of the watchtower. The protection for the Buffer Zone needs to be strengthened to prohibit any ploughing.

Nyergesújfalu Sándor-hegy - Crumerum (ID 49)

Review the Buffer Zone to protect key views and sight lines and consider extending it to the South West.

Pilismarót Kis-hegy Ad Herculem (ID 56)

Consider extending the Buffer Zone to comprise the whole of the knoll - i.e. extended to edge of the encircling roads. And also consider extending the Buffer Zone and to include any wider area of extra-mural activity.

Gizellamajor – Fortlet (ID 58)

The Buffer Zone is very narrow along the western edge of the property (because of the way the plot boundaries are configured here). Consider extending the Buffer Zone to the West of the property – as to extend the area of protection.

#### Verőce Dunamező-dűlő, Solva 38 (ID 63)

The Buffer Zone for this bridgehead component site is restricted to a length of the river bank running West-North-West and East-South-East.

In analogous circumstances (cluster 67a-b) the Buffer Zone extends across the river to encompass the pair of bridgeheads. In the case of Component 63 only the bridgehead on the North bank of the Danube has been nominated; however, because of the transverse relationship with three other bridgeheads on this alignment across the Danube, perhaps consideration should be given to extending the Buffer Zone across the island to the South bank of the Danube, in order to include the assumed location of the three other bridgeheads in this protective zone.

It is recognised that if these are already identified as national archaeological monuments this may not be considered necessary strictly on ground of protection of the sites, but it would nevertheless be appropriate on grounds of integrity in recognising the links between sites.

#### Various other component sites in Hungary

In most component sites in Hungary, the Buffer Zones have been defined as extending to the boundary of the property lots (on the cadastre map) that contains any element of the nominated component site. As currently constituted, the nominated component sites comprise 2,915 separate plots, and it is easy to understand why the pragmatic approach to the delineation of Buffer Zones has been used.

As delineated though the Buffer Zones generally do not present a coherent approach to protecting the setting of the component sites and supporting their contribution to the proposed Outstanding Universal Value.

The ICOMOS Panel would request that the delineation of Buffer Zones should be reviewed, and where appropriate, their boundaries revised to provide a more logical and effective zone of protection around the relevant nominated component site.

#### Regensburg (ID6) and Vienna (ID30)

For sites that fall within existing inscribed properties, no Buffer Zones have been provided. These are the legionary fortresses at Regensburg (ID6) and Vienna (ID30) as they are sited within the Regensburg Altstadt with Stadtamhof and the Historic Centre of Vienna World Heritage Sites respectively. The reason for not delineating Buffer Zones was that at Regensburg 'the Nominated property is situated in the existing World Heritage Site Old Town of Regensburg with Stadtamhof which has a Buffer Zone in its own right', while at Vienna this was 'due to the built-up vicinity of the component part'. In both cities, the survival of Roman remains even in densely built urban areas has been demonstrated by excavation on many occasions in recent years. The potential benefits of a Buffer Zone in defining the potential areas of archaeological interest associated with the components would seem clear for both component sites. Equally, the function of a Buffer Zone defined for one property cannot readily protect a second property defined for an entirely different reason as Buffer Zones should support the attributes of Outstanding Universal Value in the component sites to which they relate. Thus, the ICOMOS Panel would be please if the States Parties could consider to define appropriate Buffer Zones for these two properties related to Roman remains.

#### **Links to the Danube**

The River Danube was the Roman Frontier and joins together all the nominated structures, many of which were sited strategically in relation to its shores and were meant to be visible from the river, long views from watchtowers, forts, and hillforts: this contribute to their authenticity. Although it is fully appreciated that the river has moved its course since Roman times and that its exact position when the frontier was active is not fully known, the ICOMOS Panel does consider that there is a need to analyse precisely where views of the river do exist, or could exist if vegetation were differently managed, and to strengthen the protection and management of such views between sites and the River Danube, and between neighbouring sites where it is known that there was inter-visibility, either by extending Buffer Zones or defining protected views.

The ICOMOS Panel would like to request that details of such a project be provided, with an approximate timeframe indicated for when it might be achieved. Furthermore, it would be helpful to understand how research into the Roman course of the river might be supported and undertaken.

### **Protection and Management**

The ICOMOS Panel considers that legal protection would need to be put in place for the component sites at Carnuntum Legionslager, kastell, zivilstadt, vici, gräberfelder (ID N 31) to protect its cultural attributes. While it is appreciated that this component site benefits from protection for its natural aspects, this is not adequate to ensure its long-term protection as part of an inscribed serial property.

In advance of the development of management plans for component sites in Hungary, summary conservation statements for each nominated component should be developed. These should be simple structured statements for each nominated component site sets out the fundamental conservation and management issues for that component in a practical format. Such simple, summary conservation statements need to be compiled for each nominated component site prior to inscription.

For components sites in Austria and Germany (Bavaria), the ICOMOS Panel considers that summary action plan statements need to be developed, before inscription, for each nominated component site to complement the Management Plan and make it more site specific.

We look forward to your responses to these points, which will be of great help in our evaluation process.

We would be grateful if you could provide ICOMOS and the World Heritage Centre with the above information **by 28 February 2019 at the latest**, the deadline set out in paragraph 148 of the Operational Guidelines for supplementary information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any supplementary information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation process.

Yours faithfully,



Gwenaëlle Bourdin  
Director  
ICOMOS Evaluation Unit

Copy to

- Monuments Board of the Slovak Republic
- Permanent Delegation of Austria to UNESCO
- Austrian Federal Chancellery - Section II (Art and Culture) –
- Department II / 4a UNESCO World Heritage
- Permanent Delegation of Germany to UNESCO
- Bavarian State Ministry for Education and Culture, Science and Art
- Bavarian State Office for the Preservation of Monuments
- Permanent Delegation of Hungary to UNESCO
- Hungarian Prime Ministry
- Limes World Heritage Consciousness - Budavári Real Estate Development and Operations Ltd.
- Scientific Directorate
- UNESCO World Heritage Centre