

# 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/AA/1631/IR

Charenton-le-Pont, 17 December 2020

H. E. Mr Peter Reuss  
Permanent Delegation of Germany to UNESCO  
9, rue Maspéro  
75116 Paris

## **World Heritage List 2021 – Interim report and additional information request Frontiers of the Roman Empire - The Lower German Limes (Germany, Netherlands)**

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 2021. 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 Lower German Limes” was carried out by Adrian Olivier (UK) from 14 to 26 September 2020. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organization and implementation of the mission.

On 28 September 2020, a letter was sent by ICOMOS to request further information regarding the boundaries and buffer zones, archaeological research/conservation, reconstructions and ‘visualisations’, climate change impacts and community involvement in the management system. Please convey our thanks to all the officials and experts for the additional information you provided on 10 November 2020 and for their continued cooperation in this process.

At the end of November 2020, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2021. 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 2021.

We thank you for the availability of your Delegation to the meeting held on 25 November 2020 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the third part of the ICOMOS Panel meeting. During its last part meeting, the Panel has identified areas where it considers that further information is needed.

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

### **Selection of components**

ICOMOS appreciates that the two States Parties have worked to achieve a coherent and consistent approach to the selection of the components for the nomination. However, ICOMOS would like to understand why the stone quarry at Drachenfels was not included in the series, given that it is a known source of Roman building materials. Could the States Parties provide clarification on that matter?

### **Landscape and cultural contexts**

The ICOMOS Panel appreciates the importance of the river environment to the Lower German Limes, and would be pleased if a more comprehensive and contextual appraisal of the character of the river corridor landscape. In particular, the Panel queried how the course of the lower Rhine to its delta has changed during the Roman period and after that time. ICOMOS understands that detailed mapping might not be available for the entire river corridor, and envisages that this could be presented in schematic form. If possible, these materials should indicate existing knowledge about the movement of the river course over time, and also provide visual evidence of the known locations of settlements in the wider setting (including non-Roman populations).

ICOMOS considers that, given changes to the river's edge context for many of the components, the settings of those components that have retained their locational context are important. Could the States Parties briefly expand on how this aspect of the setting has been recognised and protected for components that have retained their context in relation to the Rhine?

ICOMOS considers that the aspects of inter-cultural exchange for this nomination could be strengthened by greater contextual information regarding the extra-mural settlements (where known); as well as the non-Roman populations through time and space during the operation of the *Limes*. ICOMOS acknowledges that this is a large area of research and knowledge, but would appreciate a concise additional summary.

### **Legal protection**

The ICOMOS Panel considers that there are several areas where further clarification of the legal protection for the nominated components should be provided.

ICOMOS has noted that the planned establishment of the Netherlands Environmental and Planning Law has been postponed until 2022. Could the State Parties confirm that the protection of the nominated components and their buffer zones will not be affected by this delayed transition?

The information provided in Tables 5.7 and 5.10 suggests that there are a number of components where the legal protection is 'expected in 2020'. Given that the nomination asserts that the highest available level of legal protection is in place for all nominated components, ICOMOS would be pleased to receive any updated information about these processes. Have these designations now been completed? (if so, please provide a list of specific changes to the relevant Tables in the nomination dossier). If this has not yet been fully achieved, what is the timeframe for the legal protection to be finalised? Please explain how legal protection is provided in the interim while awaiting the completion of these designation processes.

ICOMOS understands that the protection of buffer zones will be achieved primarily through the use of spatial planning laws. However, ICOMOS would appreciate further clarification about the ability of these laws and mechanisms to ensure the retention of proposed Outstanding Universal Value. In particular, how does the provision of exemptions ensure that any proposals that could have an impact on the proposed Outstanding Universal Value are the subject of appropriate decision making measures (including the scale and depth of permitted intrusions). This is of particular concern because of the inclusion of areas that have been excavated, in buffer zones rather than inside the component boundaries. Could the States Parties provide summary information to confirm the adequacy of these mechanisms?

### **Delineation of boundaries and buffer zones**

ICOMOS acknowledges receipt of the requested clarifications of the delineation of boundaries and buffer zones for a number of components. Based on the observations of the ICOMOS technical evaluation mission and discussions by the ICOMOS World Heritage Panel, it is suggested that the boundaries of several components should be revised.

At this stage in the evaluation process, ICOMOS is seeking an agreement in principle to proceed with these changes, and the likely timeframe in which these could be achieved. The specific suggestions are as follows:

- *Netherlands:*
  - Extension of the component boundary to improve the coherence of the relationship between the nominated component and the original extent of the site: (1) Valkenburg; (5b) Leiden-Roomburg Besjeslaan; (8) Utrecht-Hoge Woerd; (14) Nijmegen-Valkhof area;
  - Extension of the boundary to include all elements of component (15) Nijmegen-Hunerburg. If this proves impossible within national laws, extend the buffer zone to the south to include the full extent of the site (including areas of earlier excavations where archaeological deposits are likely to survive below the levels excavated and between the trenches);
  - Minor adjustments to the buffer zones for the following components: (5) Leiden-Roomburg; (8) Utrecht-Hoge Woerd; (14) Nijmegen-Valhof area; (15) Nijmegen-Hunerberg; (16) Nijmegen-Kops Plateau; (18) Berg en Dal-De Holdeurn.
  
- *Germany:*
  - Extension of the boundary of the following components to include the known extent of the feature and related infrastructure: (39) Koln-Alteburg (including as much of the area of the fort in the nominated component as is feasible, but excluding foreign embassies – similar to the approach that was taken for component 36 Dormagen); 44 Remagen (extending the nominated component to include the known extent of the extra-mural activity and related infrastructure);
  - Minor adjustments to the extent of the buffer zone for (24) Kalkar-Bornisches Feld.

In addition to the above, ICOMOS notes that in the Additional Information provided, a number of the component clusters that have boundaries that result in 'island' spaces or 'cut-out' areas within the overall cluster which are due to the existence of other designations, such as national built monuments (14a), cemetery (17) or municipal built monument (18b). This seems to further complicate the legal protection provided to the components overall. ICOMOS would be pleased if the legal parameters for these sites could be explained in a simple way, including the processes for development approvals (for any kind of developments, including interpretation elements or reconstructions).

#### **'Vertical buffer zone'**

ICOMOS understands that this concept has been discussed in the context of other World Heritage nominations where the most significant attributes are wholly/mostly buried in areas that have been urbanised. While this is occasionally mentioned in this nomination dossier, it is not sufficiently clear how this is applied in legal or practical terms.

Could the States Parties clarify which components have 'vertical buffer zones' and how this is provided within the systems of legal protection and/or management system? In addition, how will the provision of 'vertical buffer zones' be implemented by the various authorities involved in the current and future management of these components?

#### **Threats**

ICOMOS appreciates the information provided on Tables 4.1 and 4.2 in the Nomination dossier. However, ICOMOS considers that these tables do not accord with the statements about the condition of the components. For example, the information in Table 4.1 suggests that nearly 80% of the components are subject to moderate threats that 'need to be addressed in the near future', and yet the text states that a similar portion of the components have minimal threats. It is assumed that this may be a continuity issues to address. If so, ICOMOS would be pleased if a revised version of these tables and/or descriptive text could be provided.

In addition, ICOMOS is concerned to ensure that sufficient attention is given to the importance of maintaining the waterlogged conditions and water quality of the nominated components. The Additional Information concerning climate change impacts has been useful in this regard, however ICOMOS considers that a concise

statement about how these site conditions have been considered in the analysis of threats, monitoring and management responses should be provided.

### **Management system**

ICOMOS appreciates that at the transnational level, the management plan will be rather 'high level' and that each State Party will have its own systems of protection and management. However, the very different formats in the management plan contributed by each State Party is notable, raising questions about the consistency and effectiveness of the coordination required. In addition, its high-level orientation leaves too little insight into how the individual sites/components will be managed. Given the diversity of their settings, generating very different pressures and opportunities for interpretation, this is currently a gap in our understanding of what is proposed.

The Additional Information provided anticipates that individual management plans will be developed for each component or cluster. ICOMOS considers this to be essential, and would appreciate further information about the process and timeframe for their completion. Could a sample be provided of one or more of these plans? How will the linkage between these (and with the overarching Management Plan) be maintained?

ICOMOS would be pleased to receive updated timeframes for the completion of the other major elements of the management system, such as the frameworks for research, interpretation and sustainable tourism.

ICOMOS notes that while there are established processes for Heritage Impact Assessment (HIA) in the Netherlands, this is not in place for the German components. Could the States Parties please advise on whether this is in place in the two German States and how 'HIA' is incorporated into the systems of legal protection and management. If this is not currently in place, an indication of any plans to introduce Heritage Impact Assessment (and the likely timeframes) would be appreciated.

Given that there is a great deal of shared responsibility envisaged with local authorities and private land owners, there are aspects of the management system in practice that are not yet well understood by ICOMOS.

Could further clarification be provided on the following points:

- Who has specific responsibility as the 'site manager' for the property in the Netherlands and in Germany?
- What are the specific roles of the organisations shown in Figure 4 of the Management Plan?
- Is the approach of establishing working groups for Protection, Public Awareness, Presentation, Knowledge applied across the nominated property? In other words, is this a transnational approach, a national approach applied in both States Parties, or a national approach applied only in one or the other?

### **Archaeological excavations and excavated materials**

Based on the discussions with the ICOMOS Panel on 25 November 2020, it is understood that, following potential inscription, there will be very little future archaeological excavation permitted within the component boundaries. ICOMOS would appreciate if this could be further confirmed.

ICOMOS considers that the decision to exclude excavated areas from the boundaries of the nominated components (placing these areas in the buffer zones instead) is unusual, and that it leaves these areas with lesser long-term protection, possibly leaving them vulnerable to proposals for reconstructions or other incompatible developments.

The range and quality of archaeological materials features strongly in the justification of the Outstanding Universal Value of the proposed serial property. However, ICOMOS considers that the documentation and curation of the excavated materials is very briefly described in the Nomination dossier. ICOMOS would be pleased to receive additional information on this dimension, if available.

### **Reconstructions and visualisations**

ICOMOS would be interested to learn about whether there is a consistent approach to reconstructions and visualisations for the nominated property, including the buffer zones, and 'cut-out' areas within the component clusters.

Could the States Parties provide information of any known future proposals for reconstructions or visualisations in any of the nominated components or buffer zones (or 'cut out' parts located within the 'clusters')?

### **Existing development proposals**

ICOMOS is aware that there are several nominated components that are subject to existing development permits/approvals. ICOMOS would appreciate additional information about these, including whether Heritage Impact Assessments have been undertaken in relation to the potential Outstanding Universal Value of the serial property. The particular components for which additional information is sought include: Corbulo's Canal/Vleitvoorde, Bonn, Dormagen, and Valkenburg-De Woerd.

Could the States Parties please inform if there are any other components with existing development approvals (including in the buffer zones).

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 2021 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 States Parties 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 World Heritage Evaluation Unit

Copy to            Directorate-General for Cultural Heritage Rhineland-Palatinate  
                         LVR Office for Soil Monument Conservation in the Rhineland  
                         Permanent Delegation of the Kingdom of the Netherlands to UNESCO  
                         RCE / Dutch Cultural Heritage Agency  
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