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 “Ljubljana: The Timeless, Human Capital Designed by Jože Plečnik” was carried out by Mart Kalm (Estonia) from 28 September to 2 October 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 5 October 2020, a letter was sent by ICOMOS to request further information regarding the concept and presentation of the nomination, the selection of component parts, the development projects, conservation and communities’ involvement. Please convey our thanks to all the officials and experts for the additional information you provided on 13 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 State Party, 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 26 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 State Party could consider the following points:

**Scope of the nominated series**
The ICOMOS Panel acknowledges that the main thrust of the nomination is on a selection of public spaces and public institutions designed by J. Plečnik which gradually changed the identity of Ljubljana from a provincial town to a symbolic capital, endowing it with particular qualities.
In the additional information provided in November 2020, the rationale for nominating segments of Plečnik’s work is justified in terms of reflecting his completed projects, and this explains why it is not considered desirable to join up into one component his interventions in component sites, 1, 2 and 3, as these were designed individually. This is understood.

Furthermore, the additional information provided reiterates Plečnik’s concept of building ‘transversal and horizontal urban axes, connected by singular points where his distinctive buildings or arrangements are placed and where his approach to addressing the needs of users is clearly legible’ and connecting these to existing buildings.

ICOMOS notes that despite the emphasize of the importance of these axes in the nomination dossier, only few elements have been included in the nominated property with the Theatre Staircase and Gerber Staircase.

With regards to these axes, ICOMOS would be pleased to receive further information on:
- the extent of the transverse axes in the centre of the town,
- the neighboring buildings which became part of Plečnik’s designs as set out below.

**Components 1, 2, and 3: Transverse Axes related to the land and water axes**
The nomination dossier sets out very clearly the way ‘The urban design of “Plečnik’s Ljubljana” is based on an architectural dialogue with the existing older town. Based on the manmade cityscape and its natural features two urban axes were conceived: the land axis (Green Promenade from Trnovo Bridge along Vegova Street with the National and University Library to Congress Square with Zvezda Park); and the water axis (Promenade along the Embankments and Bridges of the Ljubljanica River)’.… and ’These two axes are connected by the transversal axes, which help to form the urbanistic network of the town’. Currently these axes are not sufficiently clearly defined and only minimally included in the components through the Theatre Staircase and the Gerber Staircase.

Could details please be provided of the scope of these axes, and how they connect to the main water and urban (land) axes, in particular with respect to the following descriptions in the nomination dossier?

- **Green promenade from Trnovo Bridge along Vegova Street**
  - ‘This small section is intersected by numerous transverse pathways and connections with the second main axis – Promenade along the Embankments and Bridges of the Ljubljanica River (water axis) and other smaller, perpendicular urban axes’.

  And,
  - ‘Vegova Street is part of the urban axis running in a southerly direction from Congress Square towards Emonska Street and Trnovo Bridge. The street runs parallel to the Ljubljanica embankment, connecting to it with a series of transverse connections and spatial accents.

- **The neighbouring buildings which became part of Plečnik’s designs**
The axes that relate to Plečnik’s projects included streets, squares, and buildings that already existed but which Plečnik improved in terms of landscaping or framing views.

Thus, for a full understanding of the impact of his work, both his structures and the urban context to which Plečnik’s interventions relate, it would be very helpful if further imagery and mapping could be provided to illustrate how the selected serial components relate to their immediate and wider urban context.

As currently presented, Plečnik’s work is nominated, while the complementary urban structures, axes and views, are in the buffer zone. ICOMOS would be pleased if details could be also provided as to how the specific structures that relate to Plečnik’s work will be protected for their contribution to potential OUV.
Links between the urban centre and the suburbs

The nomination dossier states that ‘The historical town centre is connected with vital points in both the rural and urban suburbs, and with the broader spatial network of Ljubljana: Church of St. Michael, Church of St. Francis of Assisi, Plečnik’s Zale – Garden of All Saints’. It also states that: ‘The proposed component parts in the urban landscape of Ljubljana constitute the town’s essential spaces. Beginning with the cultural landscape of the Ljubljana Marshes (church of St. Michael), they follow the water axis along the Ljubljanica River (the embankments and bridges from the Trnovo Quay to the Sluice Gate), creating a parallel land axis through the core of the historical town (from the Roman Walls in Mirje and from Trnovo Bridge along Vegova Street to Congress Square with Zvezda Park), and conclude in the nearby suburbs (Plečnik’s Zale – Garden of All Saints, Church of St. Francis of Assisi)’.

ICOMOS would find it very helpful if visualisations could be provided of these links.

Boundaries of the buffer zone/ legal protection

ICOMOS understands that the boundaries of the serial components and the buffer zones have been established on the basis of the existing legal protection. However, the way the boundaries are depicted at present, seems to leave several component parts with incomplete buffer zones (such as parts of Congress Square, the Roman Walls in Mirje, the Church of St. Michael, Plečnik’s Zale).

In addition, it remains unclear to ICOMOS how the multi-layered statutory protection throughout Ljubljana ensures protection of the nominated works by Plečnik and their related urban features from detrimental factors.

ICOMOS would be pleased if the State Party could elaborate on the rationale that has been applied to the delineation of the buffer zone; and how the existing legal protection takes effect in ensuring the buffer zone encompasses the immediate setting of the nominated property and supports its potential Outstanding Universal Value.

Number of component parts

ICOMOS would like to point to a numerical error in the document. The nomination dossier counts 6 serial components, which should be counted as 7. This is because the Trnovo Bridge is seen to be a separate serial component to the so-called land axis despite the shared buffer zone.

If this is a correct understanding of the nominated component parts, the numbering of component parts should be adjusted accordingly.

Landscape designs

Landscape designs constitute an important aspect of the nomination, as it was an important dimension of Plečnik’s project. ICOMOS acknowledges the useful additional information that has been submitted in that regard.

ICOMOS would like to gain a deeper understanding about which of Plečnik’s landscape designs survive, and which have been reinstated. Information regarding the changes that have been made compared to Plečnik’s original designs would also be welcomed, as well as landscaping plans showing vegetation, hard surfaces and urban furniture.

Urban development

The proposed new library building in Emonska Street would appear to have the potential to impact on Plečnik’s work, including his designs in Vegova Street.

ICOMOS considers that a heritage impact assessment would need to be submitted for these projects in order to identify precisely how it might impact the proposed Outstanding Universal Value.
Name of the nomination

ICOMOS acknowledges the evocative nature of the proposed name for the nomination. It is understood that it relates to the humanist and human scale transformation of the town to become a symbolic capital that includes ancient architectural references while being reinterpreted by each generation anew. Nevertheless, ICOMOS considers the name problematic in several ways: the term “capital” seems historically imprecise as strictly speaking Ljubljana only became a national capital in 1991. Additionally, it connotes that the entire city is nominated. Moreover, the adjective “timeless” seems questionable from a conservation viewpoint for a property that constitutes an urban and architectural testimony of a particular time period.

The ICOMOS Panel would appreciate if the State Party could suggest alternative names, which would better reflect the proposed nominated series.

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 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 Ministry of Culture, Cultural Heritage Directorate
UNESCO World Heritage Centre