

REPORT
of the Joint World Heritage Centre/ICOMOS
Reactive Monitoring mission
to the World Heritage property “Ancient City of Nessebar”
(Bulgaria)
16-20 January 2023



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Executive Summary and List of Recommendations

Brief outline of the mission's purpose

The State Party had invited a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property pursuant to the World Heritage Committee's Decision 44 COM 7B.154 (Fuzhou, China/online meeting, 2021). It took place from 16 to 20 January 2023.

The main purpose of the mission was to ascertain the progress made by the State Party in implementing the above-mentioned Decision and the recommendations of the 2018 joint WHC/ICOMOS Reactive Monitoring mission to the property, as well as to assess the overall state of conservation of the property and whether the property fulfils the criteria for inscription on the List of World Heritage in Danger, in line with Paragraph 179 of the Operational Guidelines.

In line with Decision 44 COM 7B.154, the mission was tasked with the review and assessment of the various documents pertaining to the conservation and management of the World Heritage property, in particular the Conservation Management Plan incorporating an updated Sustainable Tourism Management Plan, the General Development Master Plan and the Detailed Development Plan, and the General Plan for the Organisation of the Traffic in the Ancient City of Nessebar.

In addition, the mission had among its tasks the evaluation of the progress made by the State Party in the establishment of a high-level inter-ministerial or steering committee responsible for developing a shared vision for Nessebar based on its Outstanding Universal Value (OUV), as well as the progress made on the future Minor Boundary Modification of the property requested by the World Heritage Committee.

Summary conclusions on the state of conservation of the property, with specific reference to its Outstanding Universal Value (OUV)

The 2023 Reactive Monitoring mission to the Ancient City of Nessebar concludes, in line with the main findings of the 2018 Reactive Monitoring mission, that the state of conservation of the property is impacted by a number of negative factors which represent ascertained and potential dangers to the OUV of the property, in accordance with paragraph 179 of the Operational Guidelines for the Implementation of the World Heritage Convention and which threaten its authenticity and integrity.

The attributes that conveyed the OUV of the property (see Annex VI) at the time of inscription have deteriorated and, in some respects, eroded beyond recovery. The following list of affected attributes (underlined) is organised in the order of the degree of erosion of their capacity to convey the OUV of the property (quoted parts are from the statement of the OUV of the property).

1. Vernacular architecture, expressing “the different stages in the development of the characteristic residential vernacular architecture, which testify to the supreme mastery of the architecture of the Balkans as well as the East Mediterranean region” is the most affected attribute in the overall state of conservation of the property. As an attribute that conveys and supports the OUV of the property, it has been most severely undermined by years of inappropriate – illegal but also legal – interventions. As a result, the “urban fabric of the high quality” has lost its coherence and its authenticity has suffered. The State Party claims that illegal constructions have stopped and that 16 illegal constructions have been removed since 2014. However, the State Party reports statistics showing that

the great majority of the traditional houses of the Ancient City incorporated in the nomination file in 1983 are compromised or severely compromised, many of them beyond repair. The State Party should progressively restore – to the extent that it is still possible – the vernacular architecture of the Ancient City of Nessebar as an attribute conveying the OUV of the property.

2. The “tangible traces” of “numerous civilizations” as a “single homogenous whole” are hardly discernible in the context of urban transformations, with the traces of on land “archaeological structures” being very seriously affected. The mission observed severe problems of lack of care for systematic excavation and/or conservation work on the archaeological heritage of Ancient Nessebar, such as the area of the Basilica of the Holy Mother of God Eleusa, which is analysed in detail in this report. Moreover, the urbanization of the Necropolis area in the buffer zone of the property is producing a total transformation of the landscape in the immediate vicinity of the property and affects negatively the visual and functional relations between the Ancient City of Nessebar and the mainland. The accumulating evidence of the lack of care for the archaeological heritage of Ancient Nessebar gives the impression of a lack of understanding of its importance as a testimony of “centuries-old human activities” and the long and deep history of Nessebar. Considering that the remaining in-situ graves constitute the only and minimal – in relation to its original dimensions – authentically preserved area of the ancient Necropolis that has not yet been destroyed and in which no new structures have been erected, new development in this part of the Necropolis must be ruled out. On the contrary, this archaeological site with tombs and valuable objects belonging to the funerary furniture of the Necropolis of the Ancient City, being one of the attributes that can support what remains of the OUV of the property, should be carefully preserved and enhanced.
3. As a “location where numerous civilizations have left tangible traces in single homogenous whole, which harmoniously fit in with nature”, the Ancient City of Nessebar has suffered from progressive erosion of the relationship between its “multilayered cultural and historical heritage” and “the outstanding natural configuration of its rocky peninsular”. An assessment of Nessebar’s surrounding sea coastline reveals the need for recovery, to the maximum extent possible, of the authenticity of the natural landscape and for the re-establishment of the relationship between the sea, the natural landscape of the peninsula and the traditional built environment of the Ancient City that existed when the property was inscribed on the World Heritage List.
4. The Ancient City of Nessebar can no longer be distinguished as a place where “the vernacular architecture of the urban ensemble, dominated by medieval churches and archaeology, together with the unique coastal relief, combine to produce an urban fabric of the high quality”. The areas surrounding most medieval churches suffer from the impact of inappropriate earlier constructions and modifications to the buildings of traditional architecture, some of which will be very difficult to remove and others impossible to restore to their original form.
5. Moreover, the once-present quality of the Ancient City of Nessebar as a “vibrant urban organism” has been severely affected by mass tourism in the summer and a contrasting lack of vibrancy in the winter, with additional negative impacts of mass tourism orientation resulting in a great number of restaurants and commercial facilities crowding the public spaces around medieval churches and along the peninsula’s coast.

6. Additionally, the state of conservation of the property is affected by issues of protection and management as well as structural issues, in particular:
 - a) The need for an overall Conservation and Management Plan for the property that provides a collaborative framework for all stakeholders has been underlined by the World Heritage Committee since 2010. This is today it is a matter of utmost urgency. The National Institute for Immovable Cultural Heritage (NIICH) prepared Terms of Reference for the design of the Conservation and Management Plan for the property. Since the NIICH lacks the capacity to develop the Conservation and Management Plan itself, due to its limited financial and human resources, and therefore a dedicated team of external experts was to be hired to draft the plan. At the time of the mission, the public procurement procedure to hire such experts was yet to be launched.
 - b) The General Development Master Plan and the Detailed Development Plan are yet to be prepared.

Summary of the implementation by the State Party of Decision 44 COM 7B.154

The State Party has not yet submitted to the World Heritage Centre, as requested in Decision 44 COM 7B.154, the Conservation Management Plan, Detailed Development Plan and General Development Master Plan for examination by the World Heritage Committee at its 46th session (now – the extended 45th session). The Conservation Management Plan is of particular importance and urgency for this property since it would be the backbone for the future conservation and management efforts of the State Party, which have been lacking coherence until now. The Committee has been urging the State Party to prepare and implement a Management Plan for Nessebar since 2010.

In March 2022, the State Party established, as requested in Decision 44 COM 7B.154, a permanent high-level Inter-Ministerial Committee, assisted by a working group, to develop policies and proposals for legislative measures, to coordinate decisions, plans and projects for the conservation and development of the Ancient City of Nessebar, as well as to monitor the implementation of the recommendations and decisions of the World Heritage Committee regarding the property.

Moreover, the State Party has finalized, as requested in Decision 44 COM 7B.154, the research necessary for a future Minor Boundary Modification request to include all underwater archaeological remains of the ancient town. Following the mission, the State Party submitted the request to the World Heritage Centre on 31 January 2023, for consideration by the upcoming session of the World Heritage Committee.

Summary of the implementation by the State Party of the 2018 joint World Heritage Centre / ICOMOS Reactive Monitoring mission

The State Party has made progress in implementing a number of the recommendations of the 2018 Reactive Monitoring mission, such as the creation of the Inter-Ministerial Committee and undertaking underwater archaeological explorations underlined above, but also completing the inventory of the Nessebar heritage and development project permits, halting new developments, developing regulations for car traffic and parking, pursuing restoration and conservation activities in the medieval churches, finalizing research on ship graffiti, and preparing a Sustainable Tourism Development Programme.

However, little progress has been made with regard to the recommendations that pertain to the main factors affecting the state of conservation of the property:

1. Traditional architecture: this remains the most affected area, whose contribution as an attribute that conveys the OUV of the property has been most severely undermined by inappropriate interventions. The restoration of the former appearance of the typical townhouses of Ancient Nessebar remains to be achieved. While the State Party confirms that no new developments have taken place, it is unclear to what extent inappropriate interventions on the urban fabric, such as modifications to the vernacular buildings' morphology, have been halted. Moreover, the campaign to raise awareness among private owners to promote the conservation of the townhouses has not borne fruit given the number of contested cases for removal of illegal modifications on the houses.
2. Developing and adopting a plan for the rehabilitation of the mainland waterfront has not been undertaken. In fact, the mainland waterfront, with its massive developments stretching far northward and southward, seems to be beyond rehabilitation. It is hoped that at least the small part of the mainland that is included in the buffer zone of the property – the Necropolis area – could be partly and progressively rehabilitated.
3. Medieval churches and spaces around them: two medieval churches are awaiting funds to be restored – St. Michael and St. Gabriel, and Christ Pantocrator, which needs urgent measures of stabilization and conservation. The creation of public spaces around the medieval churches where street retailing and outdoor restaurant areas are not allowed is yet to be fully achieved (although it was difficult to assess the situation in mid-January when all but a few restaurants and shops were closed).

Overall conclusion

The erosion of the attributes that conveyed the OUV of the property at the time of inscription, the accumulation of issues and lack of adequate responses to redress the situation led the mission to conclude that the state of conservation of the property is impacted by a number of negative factors which represent ascertained and potential dangers to the Outstanding Universal Value of the property, in accordance with Paragraph 179 of the Operational Guidelines for the Implementation of the World Heritage Convention, and which threaten the property's authenticity and integrity.

In line with the findings of the 2018 mission, the present mission ascertains that the property is faced with specific and proven imminent danger in accordance with Paragraph 179 of the Operational Guidelines, and concludes that it meets the criteria for the inscription on the List of World Heritage in Danger, in particular:

- criterion a) iii) serious deterioration of architectural or town-planning coherence;
- criterion a) iv) serious deterioration of urban or rural space, or the natural environment;
- criterion a) v) significant loss of historical authenticity;
- criterion a) vi) important loss of cultural significance.

The property is also faced with other potential threats related to the following:

- criterion b) ii) lack of conservation policy;
- criterion b) iv) threatening effects of town planning.

List of recommendations

Vernacular architecture

1. Maintain a strict moratorium regime on new developments until the finalization and approval of the Conservation and Management Plan, General Development Master Plan and Detailed Development Plan.
2. Restrict possible interventions on the urban fabric and the peninsula landscape to emergency cases only (such as maintenance or reinforcement of buildings and structures in extremely unstable conditions) and to the rehabilitation and/or construction of the linear facilities.
3. Halt the use of previously issued permits until the individual and cumulative impacts of proposed developments have been assessed and the resulting Heritage Impact Assessment reports submitted to the World Heritage Centre, in accordance with Paragraphs 118bis and 172 of the Operational Guidelines for the Implementation of the World Heritage Convention, for review and comment by the Advisory Bodies, before any new irreversible developments take place.
4. Secure financial and technical resources for the consolidation, restoration and rehabilitation of vernacular buildings of national importance, as well as for the restoration of existing buildings of local significance, in line with the historically established urban environment of Nessebar and with the aim of restoring the visual integrity of the city's vernacular architecture.
5. Develop efficient measures to encourage and support private owners of buildings in the maintenance and conservation/restoration of their buildings.
6. A long-term plan indicating priorities and timeframes for the removal of all illegal or legal but inappropriate constructions and modifications on vernacular buildings should be implemented to restore the authenticity of Nessebar's urban fabric, mindful that this will need a long time and strong commitment.

Archaeological sites, including the Necropolis of Nessebar

7. Undertake consolidation and stabilization measures for the Early Byzantine thermae, the archaeological complex near the Western Gate and the Old Bishopric, restoration of the floor of the Basilica of the Holy Mother of God Eleusa and the fortifications tower near the South Gate, as well as proper measures for the socialization of the sites.
8. Complete the process of declaring the Necropolis as an archaeological site and consider extending the buffer zone of the property to the west to include the main area of the Necropolis; consider using the Necropolis as an open and protected archaeological park with an underground archaeological museum, preserving the ancient graves in situ, and as a place of information and awareness for the visitors to the Ancient City of Nessebar.
9. Explore the possibility of the reacquisition of the land plot with the unfinished hotel construction and its subsequent removal in order to create an uninterrupted view from the Necropolis to the peninsula.

Surrounding sea coastline

10. Develop a strategy for a recovery of the surrounding sea coastline in line with the objectives underlined in the mission report and based on the long-term visions of the

General Development Management Plan, the Detailed Development Plan and the resulting land use organization of the area along the sea coastline.

Medieval churches

11. Undertake a comprehensive programme of stabilization, conservation and restoration of the Church of Christ Pantocrator and the necessary restoration works in the Church of St. Michael and St. Gabriel.
12. Pursue efforts to develop the areas around the medieval churches free of commercial outlets and outdoor restaurants, so that these spaces contribute to enhancing the prominence of medieval churches and archaeology as attributes conveying the OUV of the property.

South coast ports (Marina 1 and Marina 2)

13. The future organization of uses in the southern ports should be the subject of a separate study, taking into consideration the specific ownership status of the ports, the appropriate use of the port buildings and facilities, and their proximity to the surrounding sensitive environment with medieval monuments and vernacular architecture.
14. A long-term plan to relocate the Nessebar Port Terminal and the Marina Nessebar facilities outside of the peninsula should be explored and pursued.

Conservation and Management Plan, General Development Plan, Detailed Development Plan, and General Plan for the Organisation of the Traffic

15. The finalization, approval and entry into force of the Conservation and Management Plan for the World Heritage property “Ancient City of Nessebar” are to be achieved as a matter of urgency in order to ensure the sustainable and equitable development and management of the Ancient City and the conservation of the attributes which support and convey the property’s OUV, as well as to address the existing threats to it.
16. In developing the Conservation and Management Plan, the State Party is encouraged to harness the participation of the local community and civil society and to build on the principles of the UNESCO Recommendation on the Historic Urban Landscape (2011) and the ICOMOS International Charter for Cultural Heritage Tourism (2022).
17. Submit the draft plans – Conservation and Management Plan, General Development Plan and Detailed Development Plan – to the World Heritage Centre for review and comments by the Advisory Bodies prior to their formal adoption.
18. Revise the General Plan for the Organisation of the Traffic in accordance with the recommendations provided in this mission report, to minimise the impact of tourist-related traffic on the cultural heritage of the Ancient City.

High-level Inter-Institutional Commission for the World Heritage property

19. The High-level Inter-Institutional Commission should intensify its efforts towards the development of an OUV-based shared vision for Nessebar, to align all current and future decisions, plans and projects for the property’s conservation, enhancement and development; these efforts should include accelerating the process of development, finalisation and adoption of the Conservation and Management Plan for the property

and the General and Detailed Development Plans, which are of the highest priority and urgency.

Underwater archaeological investigations and progress towards the future Minor Boundary Modification

20. Develop regimes within the new boundaries, if approved by the World Heritage Committee, aimed at preserving and socializing the underwater cultural values. In particular, the Conservation and Management Plan of the Ancient City of Nessebar should include specific methods and regimes for underwater cultural heritage conservation, management, interpretation and presentation, monitoring, and impact, and define the institutional actors responsible for the specified underwater archaeological area as part of the OUV of the property.

The Property

The World Heritage property “Ancient City of Nessebar” was inscribed on the World Heritage List in 1983, by Decision 7 COM VIII of the World Heritage Committee, under criteria (iii) and (iv).

Criterion (iii): The Ancient City of Nessebar is an outstanding testimony of multilayered cultural and historical heritage. It is a place where many civilizations left their tangible traces: archaeological structures from the Second millennium BC, a Greek Black Sea colony with surviving remains of fortifications, a Hellenistic villa and religious buildings from the Antiquity, preserved churches (in some of them preserved only parts of archaeological structures) from the Middle Ages. Nessebar has demonstrated its historical importance as a frontier city on numerous occasions. Having been a remarkable spiritual centre of Christianity for a thousand years, today it is a developing and vibrant urban organism.

Criterion (iv): The Ancient City of Nessebar is a unique example of an architectural ensemble with preserved Bulgarian Renaissance structure and forms a harmonious homogenous entity with the outstanding natural configuration of the rocky peninsula, linked with the continent by a long narrow stretch of land. Its nature and existence are a result of synthesis of long-term human activity, which has witnessed significant historic periods - an urban structure with elements from the 2nd millennium BC, classical antiquity, and the Middle Ages; the development of medieval religious architecture with rich plastic and polychrome decoration on its facades in the form of ceramic ornamentation typical for the period; the different stages in the development of the characteristic residential vernacular architecture, which testify to the supreme mastery of the architecture of the Balkans as well as the East Mediterranean region. The vernacular architecture of the urban ensemble, dominated by medieval churches and archaeology, together with the unique coastal relief, combine to produce an urban fabric of the high quality.

A retrospective Statement of Outstanding Universal Value was adopted by the World Heritage Committee at its 34th session in 2010 (Decision 34 COM 8E) and can be found in Annex VI. The property of 27.1 ha has a large buffer zone of 1,245.6 ha. It is situated on a rocky peninsula on the Black Sea.

The property has been in reactive monitoring since 2010. The factors affecting the property identified in previous state of conservation reports include management systems/management plan, marine transport infrastructure, urban development pressure, illegal constructions and impacts of tourism.

The existing legal framework is based on the following provisions. The Council of Ministers declared Old Nessebar and its shoreline as Architectural Urban and Archaeological Reserve by Decree No. 243 of 1956. This status is assigned by state acts for the most precious cultural goods of national importance and provides the highest degree of protection. The borders and security zone of the Old Nessebar Reserve are defined by Decree No. 174 of the Council of Ministers of 3 September 1991. With Order No. RD9R-14/05.06.2015, published in State Gazette issue 51 from 7.07.2015, the Minister of Culture approved a new classification for the immovable cultural goods, namely Group of immovable cultural goods – “Archaeological Reserve and Historical Village - Architectural Constructional and Urban Immovable Cultural Goods - Old Nessebar”, where its area corresponds to the one defined in the above-mentioned Ordinance No. 174 of the Council of Ministers.

Summary of the National Management System for Preservation and Management of the World Heritage property

The management of the property is implemented by virtue of:

1. Cultural Heritage Law (Official Gazette No. 19 of 2009) and subdelegated legislation. This law regulates the research, studying, protection and promotion of the immovable cultural heritage in Bulgaria, and the development of Conservation and Management plans for its inscribed World Heritage List of immovable cultural properties.
2. Ordinance No. 8 of the Culture Committee and the Committee on Architecture and Public Works of the architectural historical reserves Sozopol and Nessebar /SG 9/1981; covers the issues of general and detailed spatial planning; projects; carrying out conservation and restoration works; and new building. It also determines the borders and contact zones of the site, the main principles involved, and sets out the rules for protection and implementation.
3. Developed by the National Institute for Monuments of Culture (renamed as the National Institute for Immovable Cultural Heritage in 2009), the Directive Plan is a Concept paper on the preservation and development of the cultural-historic heritage of the town of Nessebar. The Plan offers an integrated professional analysis and prognosis of urban development over a wide range of activities. Ostensibly contributing to the protection, promotion and sustainable development of the property, the document, unfortunately, does not fully reflect current conditions and requires updating.
4. The current Construction and Regulatory Plan of the Ancient City of Nessebar, adopted in 1981, and the preliminary construction and regulatory plan (adopted on 30.07.1991 by the Ministry of Construction and urban planning) regulates land use, types of building, parks and gardens etc.
5. The Spatial Planning Act (Official Gazette, No. 1 of 2001 with amendments) and subdelegated legislation relate to spatial and urban planning, investment projects and buildings in Bulgaria. It also determines particular territorial and spatial protection, and the territories of cultural heritage.

The need to put in place an overall Management Plan for the property has been underlined by the World Heritage Committee since 2010.

The Mission

In its Decision 44 COM 7B.154 (Fuzhou, China/online meeting, 2021), the World Heritage Committee requested the State Party to invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property. The State Party extended its invitation for such a mission by the letter of the Minister of Culture of the Republic of Bulgaria, received by the World Heritage Centre on 2 November 2022.

In line with the same Decision, the State Party submitted the state of conservation report for the property on 30 November 2022.

The mission, organized from 16 to 20 January 2023, followed the Terms of Reference agreed with the State Party (Annex I). The mission team consisted of Irena Caquet (UNESCO World Heritage Centre) and Alkiviadis Prepis (ICOMOS International).

The mission combined on-site visits of the property with meetings with various stakeholders in Sofia and Nessebar.

During the on-site visits the mission team was accompanied by the Mayor of Nessebar Municipality and representatives and consultants of the municipal administration and the Museum “Ancient Nessebar”, as well as representatives of the Ministry of Culture and the Ministry of Foreign Affairs, the National Institute of Immovable Cultural Heritage, including its Director, of Centre for Underwater Archaeology, the Maritime Administration Directorate Burgas, and the Regional Inspection “Southeast Region” of the Directorate-General “Inspectorate for the Protection of Cultural Heritage” at the Ministry of Culture.

Several meetings were held with the State Party’s representatives to discuss the issues highlighted in the Terms of Reference of the mission, notably:

- two meetings with the Ministry of Culture, including one in the presence of the Minister himself;
- a meeting with the Nessebar municipal administration, including the Mayor of Nessebar;
- a meeting with representatives of the District Directorate for National Construction Supervision, Southeast Region – Burgas, and the Regional Inspector of the Southeast Region, Inspectorate General for Cultural Heritage Protection at the Ministry of Culture; and
- a meeting on the proposal of minor boundary modification of the property with a representative of the Centre for Underwater Archaeology and representatives of the National Institute of Immovable Cultural Heritage.

The mission had an opportunity to briefly hear from representatives of NGOs from Nessebar during a dedicated meeting organised by the Nessebar Municipality. However, the meeting would have benefited from longer time given to NGOs representatives expressing their views and from a possibility to exchange with them: the participation in the meeting of the Burgas Regional Governor and the Mayor of Nessebar Municipality meant that very limited time was left for such exchanges.

Lastly, the mission team gained valuable insights about the property’s challenges over the past years, including challenges related to the key issue of the development of the management plan for the property, during a meeting with the Bulgarian National Committee of ICOMOS.

The last mission to the property was the joint World Heritage Centre/ICOMOS Reactive Monitoring mission, which took place from 22 to 26 October 2018. The full list of its recommendations is recalled in Annex VII. There was a previous Advisory mission in 2017 and a previous Reactive Monitoring mission in 2012.

Assessment of the State of Conservation of the property

The issues covered in this section derive from the mission's Terms of Reference. The section starts with the assessment of the overall state of conservation of the property and factors impacting its OUV, before analysing construction projects and management and other issues. It is hoped that the comments and recommendations provided by the mission will serve the State Party in developing an appropriate strategy for the future of Nessebar, based on the sustainable, equitable development of the town and conservation of the attributes which support and convey the property's Outstanding Universal Value.

OVERALL STATE OF CONSERVATION OF THE PROPERTY AND FACTORS IMPACTING ITS OUV

1. Vernacular architecture

At the time of the adoption by the World Heritage Committee of the retrospective Statement of Outstanding Universal Value of the property (34th session of the Committee, 2010), the following challenge to the authenticity of the property was underlined: “the unauthorized changes to some of the vernacular buildings, and persistent and increasing pressures from tourism, public and residential functions, and investment interests, combined with the introduction of mobile retail units, are beginning to threaten the traditional urban structure of the city, its architectural appearance, and its atmosphere”.

In its 2022 State of Conservation Report, the State Party reports progress in removing mobile retail units, which the mission could not assess – everything is closed in the Ancient City in mid-January. However, the mission could observe and conclude that the spirit of the place has undergone significant alterations due to the contemporary constructions that have developed within the traditional core of the city.

The Report on the monitoring carried out in 2018 by the NIICH in the Ancient City of Nessebar, with its “Annex 11 – Results of the Monitoring”, as well as the “Comparative analysis between the Plan of Historic Monuments prepared for the 1982 nomination and the up-to-date inventory as at December 2022” undertaken by the NIICH and shared by the State Party at the mission's request, reflect with objectivity and in detail the existing condition of the monuments and buildings within the property. Thus, in 40 years (between 1982 and 2022), 9 Renaissance houses (7%) of the total number of 121 monuments (including ancient or medieval monuments or monuments of national or local importance belonging to a more recent period) have been destroyed. Moreover, of the remaining 90 vernacular architecture buildings that were also included in the list of traditional houses of the Ancient City incorporated in the nomination file in 1983:

- only 4 buildings are found to be in intact or near intact condition, of which only 2 are preserved uncompromised, both classified of national importance: the Ethnographic Museum (Dimitar Moskoyanov house), currently under restoration, and Elena Pavlova's house (Captain Pavel house), transformed into a restaurant, on the southern port; the third building, Zhelyu Bogdanov house, classified of national importance is still preserved, but with unrecoverable alterations; the fourth house, classified of local importance (Yani Pikov and Georgi Parashkevov) is in immaculate condition;
- 23 buildings are compromised, but their impact on the urban environment condition is considered recoverable;
- 34 buildings are severely compromised, with substantial modifications that are difficult to remedy;

- 31 buildings are severely compromised, with substantial modifications that are impossible to remedy (9 of them are newly built massive volume constructions with a complete loss of visual and material authenticity).

Moreover, the current state of the compromised buildings impacts negatively on the urban environment.



Fig. 1a, 1b, 1c, 1d, 1e, 1f. Vernacular architecture in the Ancient City of Nessebar

The on-site examination during the mission confirmed the conclusions of the 2018 Reactive Monitoring mission, which is furthermore corroborated by the above statistics of the State Party: the traditional character of the houses within the property which used to produce an urban fabric of the high quality, at the time of the property's inscription, has been substantially altered and indeed, for the most part, irreparably.

The vernacular architecture of Nessebar used to be characterized by the extensive use of harmonious wooden construction of the first floor based on the ground floor of stonework with horizontal wooden bracing. Wooden buttresses at an angle supported the floor extensions, and wooden balconies did not exceed the outline of the building. The roof was usually four-

pitched without openings, while shop windows had a wooden apron and were closed with wooden shutters.

In contrast to the above, a significant number of the restored buildings rest on the preserved ground floor with the old stonework, but their new upper floors are rebuilt with modern materials (reinforced concrete/stone/brick), without adherence to authentic detail and timber cladding, replacing it with render, thus producing a visual effect contradictory to the image of a traditional house of the old town (see Fig. 2a-2h in comparison with Fig. 1a-1f). In some cases, old buildings are transformed with new roofs for superelevation, roof windows (skylights) and open terraces within new roofs, traditional ceilings are removed and redone in modern material, traditional balconies are replaced by additions and extensions in modern materials, new window openings are inappropriately large. Moreover, a great number of ground floors have been converted into shops, and large storefronts have been opened to meet their commercial needs. As a result, vernacular-style houses that still remain intact are actually a small minority within the traditional core of the Ancient City, and a substantial number of them remain without satisfactory conservation work, with visible added modern amenities (air conditioning units, television aerials). The introduction of certain improvements regarding the placement of the sale products in front of the shops or the signs contributes little to offsetting the above unfavourable results in the general visual image of the city.

Comparing the 1982 diagram and the current cadastre, the comparative analysis points out that “it is apparent that there has been no change to the street grid and neighbourhood zoning, nor to the building line to the streets”. However, the loss of architectural historic fabric underlined above does mean that the authenticity of the urban landscape has been severely affected. Among positive developments, the asphalt pavement has been almost completely replaced by cobblestone compatible with the character of the old city.





Fig. 2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h. Inadequate new buildings and inappropriate modifications

The mission considers rather unrealistic NIICH's assessment regarding the recoverable alterations to the houses because they concern structure, materials, technology, volumes and building components, most of which are irreversible or at best extremely difficult to reverse, in which case the process, with an uncertain outcome, would take many years.

According to the information on removed illegal constructions provided to the mission, the Directorate for National Building Control has issued removal orders for 45 illegal structures. Of these, 6 orders have been judicially revoked and the files for two of the illegal constructions have been sent to the Mayor of the Nessebar Municipality for action by competence. Of the remaining 39 orders for removal that have entered into force, only 16 (41%) have been complied with so far resulting in the illegal constructions being removed.

Given the specific nature of the structures, the compulsory removal should be carried out by an authorized construction company to carry out the restoration and conservation of immovable cultural property, based on designs agreed upon by the Ministry of Culture. Care should be taken as to how the removal could be done in some cases: for example, in the case of the removal proposals of the additional, illegally erected floors in the houses on Krajbrezhna Street presented to the mission, although the roof is reduced (by 1 m in height), an additional floor could be hidden in the attic, lighted via skylights.

In addition to the technical and design difficulty to bring back a building to its previous condition, there is no active programme of awareness raising for the owners, nor capacity building/training for professionals and workers. Moreover, there is no functioning mechanism to encourage, assist and support financially and logistically the residents to this end, only plans to do so. An additional challenge would be the fact that not all owners of the buildings are local residents, some of the houses belong to non-resident, including international, owners.

The mission took place in the lowest tourism pressure period of the year for Nessebar. This fact did not provide the members of the mission with the possibility to have a direct understanding of the outlook and functioning of the Ancient City during summertime with regard

to its numerous hotels, shops and restaurants, which were almost entirely closed. Nor was the mission able to experience the intense tourist pressure in the public realm. The picture received was that of a city with an absolute minimum activity by local residents, judging by the activities observed, the number of cars parked on the streets and the parking areas, and the limited number of children in the schoolyard. Therefore, the mission confirms the observation made by the members of the 2018 mission that “the conversion of buildings from housing into retail or tourist facilities leave the city almost uninhabited”.

In conclusion, the type of tourist-oriented development followed in the past years and the lack of adequate protection and control by the State Party authorities over the years of the developments within the property have affected seriously the attributes supporting its OUV. Removing illegal or legal but inappropriate interventions within the vernacular architectural ensemble of the Ancient City, where possible, will be lengthy, costly, and difficult (with difficulties not just technical, but also judicial as underlined above). The current state of the vernacular buildings underlines the necessity of exercising effective control during the restoration/reconstruction works at all stages, including the completion stage.

2. Archaeological sites

This section complements the observations made under Issue 6 regarding the Necropolis of Mesambria Pontica and the archaeological area in the immediate vicinity of the Basilica of the Holy Mother of God Eleusa.

Conservation, restoration and even reconstruction have been carried out on many of the archaeological sites of Ancient Nessebar in stages over the years. The greatest attention has been paid to the presentation and socialization of the fortification system of the Ancient City. Most of the archaeological sites have preserved their image and integrity and are exposed in the open.

As the 2018 NIICH monitoring report notes, “no major changes in the physical condition of the sites were observed during the period 2011-2018. (...) In recent years no projects related to the conservation and restoration of the archaeological immovable cultural heritage of Ancient Nessebar have been developed and implemented. The lack of supportive conservation combined with the specific local climatic conditions results in slow degradation of both the original substance and the conservation seals and overgrowths” (pp. 4-5).

The present mission observed severe problems of lack of care for systematic excavation and/or in-situ conservation work on the archaeological heritage, such as the already mentioned area of the Basilica of the Holy Mother of God Eleusa, the demolition of the north wall of the Church of Holy Mother of God Vlacherna Icon, the ancient cistern, the Byzantine thermae (Fig. 4), the Ottoman bath, the northern coastal part of fortress walls, the remains of the basilica in the northwest of the city (Fig. 3), the western gate, the apsis and the superstructures on the walls of the Basilica of St. Sophia (Fig. 22a) and the fortifications tower near the South Gate (Fig. 5a, 5b).



Fig. 3. The remains of the basilica next to the Western Gate are in a state of abandonment without any maintenance



Fig. 4. New constructions and “rehabilitation” of old buildings in the immediate vicinity of the ruins of the Byzantine thermae complex, which remain in an emergency state of conservation

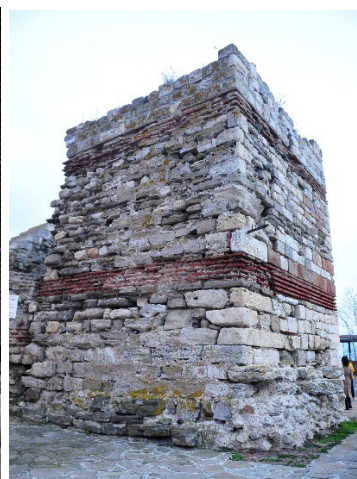


Fig. 5a, 5b. The fortifications tower near the South Gate

3. Surrounding sea coastline

Context

According to the “Comparative Analysis between the Plan of Historic Monuments prepared for the 1982 nomination and the up-to-date inventory as of December 2022” (prepared by the NIICH and received after the mission), “the shoreline has been substantially altered due to the necessary rescue bank strengthening. The change affects the northern and south-eastern shore, as well as the isthmus, whose thickness is slightly increased.” The gradual alteration of the northern coastline (Fig. 7a, 7b) after shoreline reinforcement and its transformation into areas that include car parking and sports facilities has irreversibly altered the values underpinning the OUV of the property, as specified in criterion (iv): “the Ancient City of Nessebar (...) forms a harmonious homogenous entity with the outstanding natural configuration of the rocky peninsular”, as well as “the vernacular architecture of the urban ensemble, dominated by medieval churches and archaeology, together with the unique coastal relief, combine to produce an urban fabric of the high quality”.



Fig. 6. Old photo of the peninsula from the beginning of 20th century (coloured)



Fig. 7a, 7b. The gradual alteration of the northern coastline (internet)

Mission's observations

- There is a whole series of illegal wooden structures along the west coastline and along the road above it that serve as open-air restaurants.
- A contemporary double building (3/4 floors + 1 under the roof) has been developed in direct proximity to the archaeological site where the remains of the Catholicon of the Byzantine monastery of the Mother of God Eleusa are located, destroying the vista from the coast up the Ancient City.

- Most of the renovated houses along the upper road of the sea coastline have elements incompatible with the character of the vernacular architecture of Nessebar.
- Intensive development can be observed on the south coastline, with buildings erected aside and above the road resulting in the total alteration of the original character of the coastline, the image of the city and the sea view. The Byzantine Church of St. John Aliturgetos suffocates and is lost in the crowd and volume of new unacceptable constructions.

Views towards the north coast:



Fig. 8. The state of the north coast with the ruins of the ancient walls in urgent need of stabilization and conservation and the illegal constructions

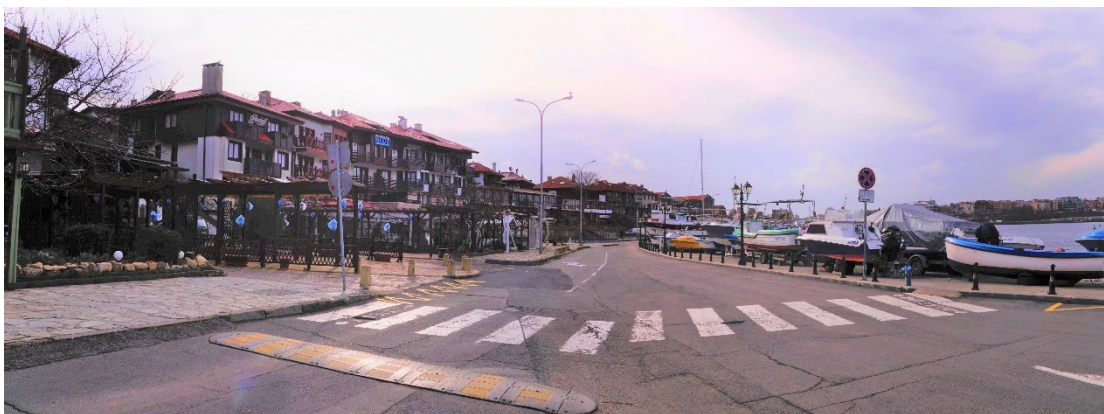




Fig. 9a, 9b, 9c. Illegal wooden structures all along the north coast



Fig. 10. Remains of the Basilica of the Mother of God Eleusa, with the new hotel in the coastal area



Fig. 11. Existing condition of the monastery site and the north coastline as an open-air parking area

Views towards the south and south-east coast:



Fig. 12. A mix of many styles



Fig. 13. It is difficult to distinguish the Church of St. John Aliturgetos among the constructions on the seashore



Fig. 14a, 14b, 14c. Existing condition of the contemporary constructions along the north, north-east and south coasts

Recommendations

The State Party is recommended to develop a strategy for the recovery of the peninsular sea coastline, based on the long-term visions of the General Development Management Plan, the Detailed Development Plan and the resulting land use organization of the area along the sea coastline that should support and protect the OUV and its attributes. As part of it, an evaluation, recording all the modifications since the nomination of the property until the present time and analysis of the existing situation should be undertaken, which should encompass:

- elements of the natural environment: natural slope, coastline, views (to and from the sea);
- elements of cultural heritage: archaeological excavations, defensive walls, medieval monuments, vernacular houses;
- evidence of human rescue operations: reclaimed coast, shore slope stabilization works (anchors, reinforced concrete layers), asphalt road;
- constructions made along the coastline and in depth to the first parallel road, both as a private initiative and by the municipal or state authorities.

The following objectives of the strategy are to be considered:

- removal of all inappropriate constructions in the coastal area;
- recovery to the maximum extent possible of the authenticity of the natural landscape;
- recovery of the relationship between the sea, the natural landscape of the peninsula and the traditional built environment of the Ancient City;
- formation of an esplanade along the sea coastline area to include places with small refreshment shops (managed by the local authorities), places of free rest, beaches and areas with scenic views;
- signalling the location of the ancient walls on the north coast coating, according to the findings of the archaeological excavations, to show their continuity with the preserved sections on land and with the marine sections that will be illuminated in the sea (as mentioned to the mission by the Centre for Underwater Archaeology); such signalling would enhance the understanding of the ancient city walls system by visitors;
- improvement of shore slope stabilization structures (old and new, where required) in a manner compatible and integrated with the aesthetic values of the landscape and the elements of the cultural heritage of the property;
- exploring possibilities of removing the naval base facilities, so that the area can be attributed to the community and archaeological excavations can develop further.

4. Medieval churches

The State Party is to be commended for continuing to seek securing financial resources to complete the restoration and conservation measures in the Ancient City's medieval churches and to restore old icons. Thus, during the last decade consolidation, conservation and restoration works have been undertaken in several medieval churches of Nessebar: St. Stephen (Fig. 15a, 15b), St. John the Baptist, St. John Aliturgetos, St. Clement, and St. Paraskeva, albeit with a controversial new roof (Fig. 16a, 16b). However, in the Church of St. John the Baptist, chronic problems of humidity and cracks unprofessionally filled in during the restoration, liquidated leaks on the dome drum, traces of moisture throughout the plinth and inadequate control of the interior space conditions for the wall paintings have been observed.



Fig. 15a, 15b. St. Stephen Church: south view and the restored wall paintings in the altar



Fig. 16a, 16b. St. Paraskeva Church: controversial restoration with the addition of a metallic roof and the church's interior

It is noteworthy also that some of the archaeological sites and medieval churches in the Ancient City have seen an improvement and successful interventions in their immediate surroundings (e.g. Church of St. John the Baptist). Moreover, within the project “Faith in Nessebar” of the Municipality of Nessebar for conservation and highlighting the churches in the old city, the shaping of public spaces around them and the arrangement of a cultural and tourist route have been realized, while some rescue archaeological excavations have been carried out with the discovery of new archaeological findings.

Commendably, research on the graffiti with medieval ships on the walls of the medieval churches of the Ancient City has been undertaken, and the results are being processed in view of preparing their publication in catalogues. Overall, efforts are being made for better presentation and communication of Nessebar’s rich cultural and religious heritage, including through the recently prepared Strategy for the Cultural Heritage in Nessebar – its outline was presented to the mission and an English translation of the strategy shared with the World Heritage Centre after the mission.

However, several medieval churches are in need of urgent interventions:

- Church of Christ Pantocrator: need for urgent measures of stabilization and conservation (Fig. 17a, 17b, 17c, 17d);
- the cross-in-square Byzantine church (10th century), north of the Old Bishopric, is in a poor state of conservation;
- Church of St. John Aliturgetos has been effectively stabilized, yet future interventions to support sloping ground require greater sensitivity in the design of the public realm and use of materials (Fig. 18a, 18b).

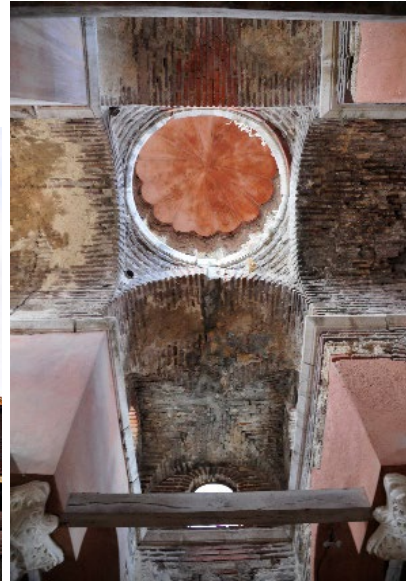


Fig. 17a, 17b, 17c, 17d. The Church of Christ Pantocrator remains in an emergency state of conservation



Fig. 18a, 18b. Church of St. John Aliturgetos

Given the efforts invested into restoring, conserving and socializing the medieval churches, it is regrettable that the alteration of the urban fabric is more pronounced exactly in the settings

of the medieval churches and ancient monuments (e.g. Church of St. Todor, Church of St. John the Baptist, Church of St. Stephen, Basilica of St. Sophia), where new buildings of inappropriate scale and architectural morphology have been erected and create a highly negative visual impact on the churches (Fig. 19, 20, 21, 22a, 22b).



Fig. 19. New built environment around the Church of St. Todor



Fig. 20. St. John the Baptist: a successful intervention in the immediate surrounding area yet an inappropriate tall hotel right next to the church



Fig. 21. Inappropriate new building next to the Church of St. Stephen



Fig. 22a, 22b. Basilica of St. Sophia (Old Bishopric): a successful intervention to highlight the surrounding area is undermined by the “rehabilitation” of the neighbouring buildings

In conclusion, while the State Party has confirmed that no visas for new construction in the Ancient City have been granted since the last Reactive Monitoring mission to the property and that no illegal structures have been erected, the earlier inappropriate constructions around the medieval churches, as seen on the images above, are still there and will be very difficult to remove. None of them has been submitted to the World Heritage Centre in accordance with Paragraph 172 of the Operational Guidelines. Overall, the spaces around the medieval churches do not contribute to creating “the urban ensemble, dominated by medieval churches and archaeology”, which is among the values defining the OUV of the property.

5. South coast ports (Marina 1 and Marina 2)

The south coast ports – Marina 1 and Marina 2 – are excluded from the World Heritage property and are currently under the “protection zone B” regime.





Fig. 23a, 23b, 23c. The south coast ports consist of separate units of development, distinct from the rest of the protected Ancient City of Nessebar yet adjoining the property

The mission has identified several problems in the southern port area, which were also noted in the State Party's state of conservation reports and by the previous Reactive Monitoring mission. Among them are new constructions, a large number of tourist kiosks and newly constructed restaurants that facilitate an independent development plan for the ports "Commercial and administrative complex Marina Nessebar 1" and "Commercial and servicing complex Marina Nessebar 2". In contrast, the modernist large building erected right in front of the ancient theatre and the fortification walls has remained unused for the last two years. Extensive areas are available for car parking spaces and not to serve exclusively the needs of the ports.

Among the agreed projects of the period 2018-2021, there is a project "Marina with the commercial administrative complex Marina Nessebar 1 – processing during construction of an administrative building under Art. 154 of the PDA, architecture / TP" (No. 52: UPI II-468, QTR. 105). This proposal reveals a serious problem in the management of the ports in relation to the World Heritage property in their immediate vicinity. These areas, organically connected to the daily operation of the city, are allowed, within the framework of existing legislation, to follow an independent development, without being subject to the restrictions to be outlined in the General Development Management Plan and the Detailed Management Plan of the property (still awaiting finalization). The inclusion of the port areas in the existing regime of "protection zone B" does not provide satisfactory solutions to the issue of the existence of an area of independent development on the southern coast of the peninsula. This issue can only be solved by the high-level Inter-Institutional Commission for the World Heritage property, which brings together several relevant ministries.

Recommendation: the future organization of the uses in the southern ports should be an object of a separate study, taking into consideration the specific ownership status of the ports, the proper utilization of the buildings and port facilities, and their proximity to the surrounding sensitive environment with medieval monuments and vernacular architecture. Ultimately, as recommended by the 2018 Reactive Monitoring mission, in the long term it would be beneficial to the World Heritage property to relocate the Nessebar Port Terminal and the Marina Nessebar facilities outside of the peninsula.



Fig. 24. The ancient theatre of the city – view to the south port with the modern, not-used building in the background and the contemporary additions to the right

CONSTRUCTION PROJECTS, PLANNED OR CARRIED OUT

The State Party has confirmed that the project for the redevelopment of the area of the Necropolis of Nessebar in the buffer zone of the property is the only planned project within the property or its buffer zone. The State Party submitted a report entitled “Heritage Impact Assessment for Investment Intent for a New Development in the Territorial Scope of the Ancient Necropolis of Mesambria, in the Security Area of the World Cultural Heritage Ancient City of Nessebar” to the World Heritage Centre in October 2022, in line with Paragraph 172 of the Operational Guidelines. A detailed analysis of the proposal that follows replaces a Technical Review by ICOMOS, which would normally be undertaken in this situation.

The second part of this chapter focuses on a construction project carried out within the property, next to the Church of the Holy Mother of God Eleusa, which is so large and negatively impactful on its historic surroundings that it is illustrative of the main problems facing the property.

1. Necropolis of Nessebar

Context

The view that opens up from the archaeological site of the Necropolis towards the peninsula and the Ancient City is unique, thanks to its specific position directly opposite the isthmus and to its slope towards the sea. The wider area of the mainland just opposite the isthmus had been an abandoned cemetery since the time of Ottoman rule. The site was formerly known as “The Dunes”.

The archaeological excavations area falls within the buffer zone “A” of the group immovable cultural assets of a world and national importance – “Archaeological reserve and historical settlement – architectural, construction and urban immovable cultural asset – Ancient town of Nessebar”, according to order No. RD9R-14/05.06.2015 of the Minister of Culture. The area consists of northern and southern distinct parts (Fig. 25).



Fig. 25. Archaeological excavations in the area in 2007-2010: the northern part is visible to the right (municipal ownership) and the southern – to the left (private ownership)

The excavations, construction and channelling work in the new, wider area of Nessebar have brought to light tombs and valuable objects belonging to the funerary furniture of the Necropolis of the Ancient City. Already in 1911, a precious bronze hydria (dated 4th century BC), was found in the area. Since then and up to 2010, field research investigations carried out in an area of 15,000 sq. m have revealed more than 1,300 graves of different historical eras and other archaeological structures (medieval pits, workshops, furnaces). Remains of four chronological timeframes were documented and studied: Classic period (5th-4th centuries BC), Hellenistic period (4th-2nd centuries BC), Late Antiquity (4th-7th centuries) and Middle Ages (12th-14th centuries). The following types of burial grounds were found: simple burial pits, embedded in the ancient area, graves of tiles and slabs arranged as eaves, and cist graves built of shaped stone blocks (Fig. 26a, 26b).



Fig. 26a, 26b. Part of the northern site (left, municipal ownership) and the southern site (right, private ownership) of the Necropolis excavation area

The recording protocol dated 18.11.2010 by the Committee established pursuant to Order No. ПД 9К-0146/22.07.2010 of the Minister of Culture for the acceptance of archaeological research carried out on the territory of the Immovable Archaeological Cultural Property “Ancient Necropolis of Mesambria in the Zoned Property I – joint and Zoned Property X of the q. 54 as per the plan of the town of Nesebar” within the conservation area of the Ancient City of Nessebar states: “The archaeological structures found are of high scientific, cultural and historical value” (p. 2 of the English translation).

The above statement is supported by extensive published scientific literature on the excavation works in the area. On the basis of additional systematic or rescue excavations in the new city on private plots to date, archaeologists have identified the boundaries of the Ancient Necropolis of Mesambria Pontica, which extends far beyond the boundaries of the part included within the buffer zone of the World Heritage property (Fig. 27).

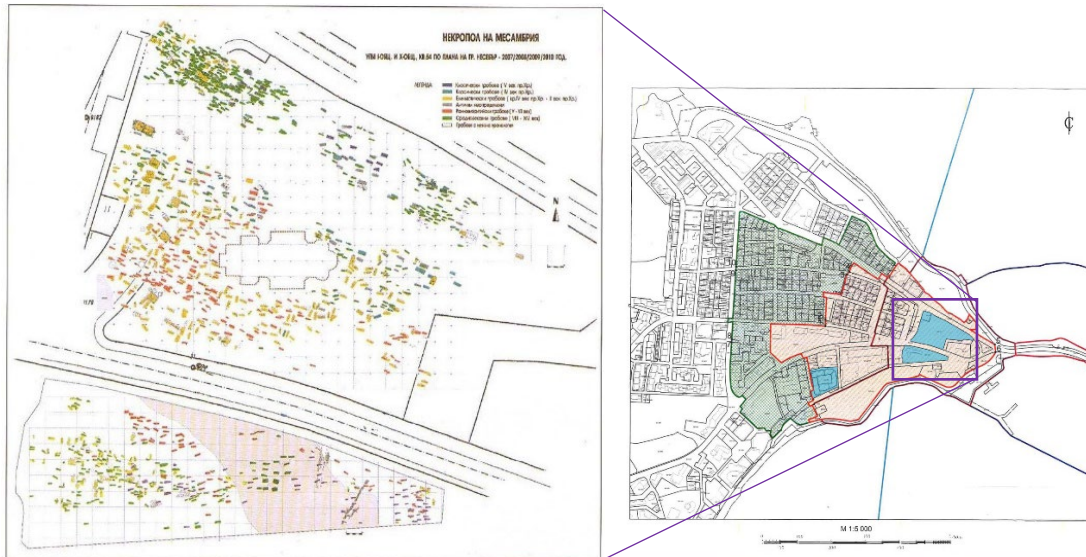


Fig. 27. The Necropolis of Mesambria Pontica: a plan of the areas excavated between 2007 and 2010 – location of the Necropolis of Mesambria Pontica, with its main area (shaded in pink) and its buffer zone (shaded in green), while the buffer zone of the property is indicated with the north-south blue line

Regarding the findings, a multitude of offerings has been discovered, among which six valuable bronze hydrias, all used as funeral urns with cremation remains (Fig. 28a-28d). The last one was discovered in September 2010 in the south-west corner of the northern part of the Necropolis. Four of the hydrias have applications with relief images of mythological scenes, executed with great skill in the style of the late classical era. The outstanding findings from the Necropolis of Nessebar have repeatedly been presented in international exhibitions (Barcelona, 2005, Japan, 2008, Louvre Museum, 2015).



Fig. 28a, 28b, 28c, 28d. Some of the most outstanding hydrias and gold artefacts discovered in the graves of the Necropolis

It is very likely that the adjacent areas covered by asphalt roads, as well as the coastal area to the north, which have not yet been excavated, would yield important archaeological finds.

In 2012, the Ancient Nessebar Museum together with the National Archaeological Institute with Museum, Bulgarian Academy of Sciences, launched a procedure for declaring the area of the Necropolis of Mesambria immovable cultural value under the national legislation. A commission appointed with Order No. ПД9К-157/31.07.2012 of the Minister of Culture, with its own record decision dated 07.08.2012, has recommended to the Minister to establish the status, the boundaries and regimes of safeguarding this value. The boundaries of the ancient and the medieval Necropolis of Mesambria were outlined in the proposal for its declaration. The decisions contained in this record were adopted at a meeting of the Specialized Council of Experts for Safeguarding Intangible Cultural Values with the Minister of Culture. However, the Minister of Culture has not issued an order declaring the Necropolis of Mesambria an immovable archaeological cultural value.

New constructions in the archaeological area of the Necropolis

In 1936, a rest house for financial officers was built in the southern area, the work of architect Chr. Plakonof. The building, with its concave shape, was adapted to the coastal terrain. The exterior architecture had features of modernism. Within the northern part of the Necropolis area and on a private plot, a new hotel had been built, which had “incorporated” a traditional windmill in the same place – one of the old landmarks of the site. The construction of this hotel in this particular location has destroyed part of the view of the peninsula (Fig. 29, 30, 31). Additionally, in 2021, new construction, repair and installation works on the building were carried out without coordination with the Ministry of Culture under Art. 84 of the Cultural Heritage Act without the investment project being approved by an order of the Partial Development Amendment and without an issued construction permit. The work was suspended by the General Directorate “Inspectorate for the Protection of Cultural Heritage” at the Ministry of Culture. The windmill had already been removed from the city’s list of monuments.



Fig. 29. The new hotel on the southern part of the area with a view to the sites with the archaeological excavations and to the peninsula is visible in the centre of the photograph to the left of the road



Fig. 30. The northern part of the excavation area facing south: present situation, with new hotels built inside the buffer zone of the property; to the left – the hotel that “incorporated” the traditional windmill, with new expansion constructions; the southern part (private ownership) of the archaeological site lies behind the row of the banners

Fig. 31. View of the hotel with the incorporated windmill before its subsequent illegal reconstruction

At the western border of the northern archaeological area and within the buffer zone of the property, a series of high buildings, mostly hotels, with an inappropriate morphology and height have been built, which constitute a visual barrier by preventing a smooth visual transition from the peninsula towards the interior of the new city (Fig. 32, 33).



Fig. 32. Western border of the Necropolis, buffer zone of the property: hotel building with an imitation of a windmill on the facade

Fig. 33. View from the peninsula to the Necropolis, with tall buildings of new hotels in the background and the illegally reconstructed hotel (unfinished) seen to the right of the statue. The statue is an initiative of the Port Authority, which is under the Ministry of Transport, Information Technology and Communications

The project “Investment Intent for a New Development in the Territorial Scope of the Ancient Necropolis of Mesambria, in the Security Area of the World Cultural Heritage Ancient City of Nessebar” is developed following the Detailed Development Plan admitted by Order No. 300 of 28.10.2016 of the Mayor of Nessebar. Two complexes of buildings are foreseen. The land-use indicators and the plots (after the change of impairment of the indicators) are as follows:

- in the upper part of the site:
 - 1) a primary school,
 - 2) a sports hall,
 - 3) an underground parking area, and
 - 4) landscaping, exposure and archaeology in an area of 10,231.40 sq. m and with a height of 10 m;
- in the lower part of the site:
 - 5) a chapel,
 - 6) a tourist information centre, and
 - 7) landscaping, exposure and archaeology in an area of 1,679.36 sq. m and with a height of 8 m.

The draft plan does not provide additional analytical details of the surface areas that are foreseen for each proposed function. However, the proposed buildings cover a third of the plot (30%) and the construction plan does not take into account the instructions in the conservation regimes of the Ancient City of Nessebar, point 3.4. “Prescriptions for the protection of the protection zone of Ancient Nessebar” and point 3.4.1. “General Prescriptions: The area of the buffer zone requires the construction to be unattached, with low density and with horizontal positioning on the terrain so as to correspond to the traditional spatial characteristics of the property and to preserve the cultural landscape, including the views towards immovable cultural values”. According to Municipality’s proposal, “the build-up is to allow the possibility of

exposure of cists in groups including both preserved *in situ* and transported from other sections single stone facilities in good physical condition and with a specific typological affiliation, observing the provisions of Art. 169(2) of the Cultural Heritage Act. The design of the construction plan considers the instructions from the Protocol dated 18.11.2010 in the implementation of Order N. P99-0146 / 22.07.2010 of the Minister of Culture for the acceptance of archaeological research. The two newly-formed RLPs [Regulated Land Properties] are envisaged to have exhibiting place (on-site or after dismantling) for at least three complexes of the studied masonry tombs – cists.”

Comments

The property is inscribed on the World Heritage List as “Ancient City of Nessebar”, which highlights the centrality of its multilayered cultural and historical heritage, including archaeological remains, in its OUV. Consequently, the Necropolis – a functionally integral and essential part of the attribute “tangible traces of numerous civilizations” that conveys the property’s OUV – contributes to the definition of Nessebar as an ancient city. Moreover, the excavations have brought to light an extremely large number of graves and highly valuable finds, as described above, which enrich the significance of the site as an ancient city.

As acknowledged in the comprehensive and detailed note provided by the NIICH to the mission, “after the year 1990, the area of the necropolis was affected by intensive construction of multi-storey buildings with foundations laid deep into the ground, which caused the destruction of hundreds, and probably thousands of graves. Archaeological surveys within the period from 1990 and 2005 were conducted as an exception, usually upon the receipt of an alert for discovered graves during ongoing construction works” (p. 5). Removing up to the sterile layer an important archaeological site such as the Mesambria Necropolis contradicts contemporary conventions and methods of archaeology, which recommend not to excavate everything since excavation to the sterile layer has a definitive impact: the site is destroyed and only the knowledge about it is preserved (provided that excavations are done correctly and at the right time).

In particular, the Charter for the Protection and Management of Archaeological Heritage (1990) underlines that “the overall objective of archaeological heritage management should be the preservation of monuments and sites *in situ*, including proper long-term conservation and curation of all related records and collections etc. Any transfer of elements of the heritage to new locations represents a violation of the principle of preserving the heritage in its original context” (Article 6). Moreover, it advises that “the presentation of the archaeological heritage to the general public is an essential method of promoting an understanding of the origins and development of modern societies. At the same time, it is the most important means of promoting an understanding of the need for its protection” (Article 7).

Conclusion

The urbanization of the Necropolis area is producing a total transformation of the landscape in the immediate vicinity of the property, in its buffer zone, and negatively affects the visual and functional relations between the Ancient City of Nessebar and the mainland.

The remaining *in-situ* graves constitute the only and minimal – in relation to its original dimensions – authentically preserved area of the ancient Necropolis that has not yet been destroyed and in which no new structures have been erected. Therefore, considering new development in this part of the Necropolis must be ruled out. Instead, the process of its declaration as an archaeological site should be completed, and its protection and presentation reinforced through the creation of an archaeological park.

Indeed, the area offers opportunities to enhance the historic and cultural significance of Ancient Nessebar's setting and can be used as:

- an open and protected archaeological park preserving the ancient graves in situ, which would create a protective backdrop to the view from the peninsula to the high and inappropriate buildings erected at the back of the archaeological site; a protective cover netting (such as a perforated metal construction) could be placed above the archaeological site to protect it;
- as an extension of the archaeological museum, which currently has very limited exhibition space: this will allow for important findings of the Necropolis to be exposed in situ; the main structure should be considered underground (as long as evidently there is no underground archaeological layer), so as not to block the visual connection between the archaeological park and the Ancient City;
- as a place for information and awareness-raising of the visitors to the Ancient City of Nessebar.

Additionally, the mission recommends that:

- the buffer zone of the Ancient City of Nessebar is extended to the west to include the main area of the Necropolis of Mesambria Pontica as a recognized archaeological site;
- the Municipality explore the possibility of the reacquisition of the land plot within the Necropolis archaeological area on which the unfinished hotel is erected (Fig. 37) and the subsequent removal of the erected structure in order to create an uninterrupted view from the Necropolis to the peninsula;
- due care be taken to carry out archaeological excavations in the adjacent areas covered by paved roads and the coastal areas, which have not yet been excavated and which are likely to yield significant archaeological findings.

2. Building next to the Basilica of the Holy Mother of God Eleusa

In 2010, the World Heritage Committee in its Decision 34 COM 7B.81 on the Ancient City of Nessebar urged the State Party and the Municipality authorities to immediately stop any development projects which may affect the Outstanding Universal Value, integrity and authenticity of the property. In 2013, the Committee in its Decision 37 COM 7B.73 requested the State Party to maintain the moratorium on any new constructions within the World Heritage property, its buffer zone and at the surrounding sea coastline until the development and approval of an Urban Master Plan and a Conservation Plan. However, despite those plans yet to be approved, an imposing multi-storey building was erected (Zoned Land II-695, quarter 18A, Kraybrezhna Str.) in 2014-2015, dominating the adjacent remains of the Basilica of the Holy Mother of God Eleusa (Fig. 34). The State Party has not notified the World Heritage Centre of the project to build it within the World Heritage property in accordance with Paragraph 172 of the Operational Guidelines. Notwithstanding that the building was completed before the last Monitoring mission to the property, the present mission examined it in detail, trying to understand how a new building could appear with such obviously negative physical and visual impact not only on the adjacent basilica, but also on the coastline.

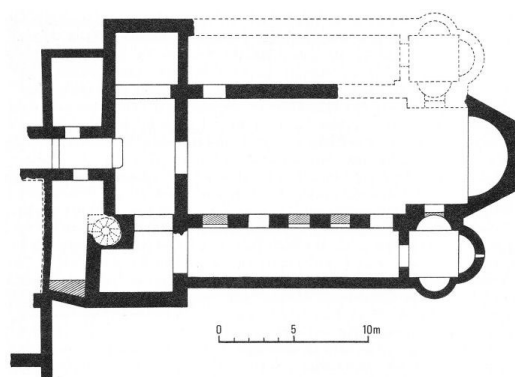


Fig. 34. The new development dominating over the remains of the Basilica of the Holy Mother of God Eleusa

Fig. 35. Mesambria, “Sea Basilica”, plan (after I. Velkov) in: R. Hoddinot, *Bulgaria in Antiquity*, 1975, fig. 100, p. 320

Historical context

The Church “Holy Mother of God Eleusa” (“Eleusa” – from Greek, meaning “tenderness”) is a three-aisled and three-apsed basilica with a length of 28 m and a width of 18 m. Its construction dates back to the 5th century, and the brick seals are from the time of Emperor Justinian (527-565). It is assumed that this is the oldest Nessebar church. The sea washed away part of the shore and as a result, the north aisle and the northern part of the central nave were destroyed (Fig. 35). The “Holy Mother of God Eleusa” monastery in Nessebar is mentioned in documents of Tsar Ivan Alexander (1331-1371). In 1920, archaeological excavations were carried out here under the leadership of Ivan Velkov (Fig. 35). The remains of five tombs (looted) have been preserved in the narthex. Currently, the remains of the basilica are preserved and partially restored. The icon “Holy Mother of God Eleusa” currently exhibited in the National History Museum in Sofia (Fig. 36a, 36b) is believed to come from the above-mentioned monastery in Nessebar.



Fig. 36a, 36b. Icon “Holy Mother of God Eleusa” (137x107 cm), National History Museum, Sofia

Archaeological excavations and new development

The area with the recently erected building (Fig. 34) falls within the boundaries of the territory of the Archaeological and Architectural and Urban Reserve “Ancient Nessebar”, established by Decree No. 243/18.07.1956 the Council of Ministers of Bulgaria and within the boundaries

of the World Heritage property “Ancient City of Nessebar”. Excavations on the north-eastern coast revealed remains of the ancient fortification walls (Fig. 37).

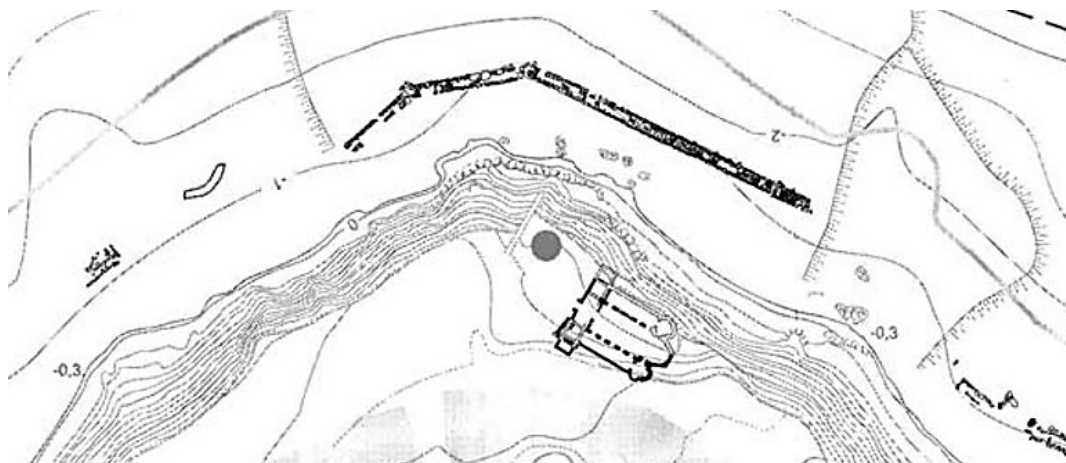


Fig. 37. The north-eastern coast with the remains of the “Sea Basilica” and the ancient fortification walls (graphic presentation according to A. Kamenarov after Ognenova-Marinova, Chimbuleva A 80/1981, appendix No. 3)

In 2006 and 2007, large-scale surveys were carried out in the north-eastern part of the peninsula. Protocol No. 5216/13.07.2007 of the Director of the National Institute of Monuments and Sites notes, among others, that “the structures of the Early Classic period (first half-mid 5th century BC) are the earliest from the time of Greek colonization so far studied at Mesambria, and they are of particularly high scientific value.” (...) “From the medieval period, two more graves (6th-7th centuries) from the necropolis documented in 2006, as well as two graves from the 14th century, were discovered. Seven new pits have been excavated, dated with materials from the 12th-14th centuries.” (...) “The unearthed architectural remains, despite their fragmentary character, are the only immovable monuments from the respective eras (with the exception of the fortress walls) on the peninsula that illustrate in a relatively small area individual chronological stages of the history of the town. Their proximity to the late antique and medieval monastic Basilica of the Holy Mother of God Eleusa constitutes an additional argument in favour of their future socialisation. In this way, a peculiar complex of monuments from different eras will be created in the north-west of the peninsula.” (...) “From a scientific point of view, the remains of a Hellenistic building (point 1c of the findings), parts of a Late Antique building (point 1e) and the base of a Hellenistic wall in quarter E3/G3 (on the general plan) are of the highest value and in fact have the highest expositional value. In view of the fact that the town of Nessebar is inscribed on the UNESCO World Heritage List, the committee proposes that the Board of Experts of the National Institute of Monuments and Sites consider at its meeting the results of the completed studies and discuss the way in which the structures described above should be preserved.”

Excavations to the west of the basilica revealed structures from the Early Iron Age and Classical periods under Hellenistic and Early Byzantine walls, which are located in the area into which the monastic complex surrounding the basilica extended (Fig. 38).



Fig. 38. General view of the excavated site, from northeast, with stone cists graves and ancient stone walkway paving

An old photo from 1921 shows that no building existed on the plot east of the basilica, but there was an old windmill there (Fig. 39, 40). Building Permit No. 106/28.09.2007 was issued for a residential two-storey building on the site of the old windmill. Construction started in 2010 following an archaeological survey of the plot.



Fig. 39. Karel Shkorpil archive (1921)



Fig. 40. Photo of the basilica site as in 2010 (internet)

In 2010 and 2011, the plot of land to the east of the basilica was surveyed. An elevation of 6.8 m was reached to sterile soil. In accordance with the decision of the Commission Protocol (17.01.2011), the developer of the new construction was required to take the necessary actions to strengthen the southern profile of the excavation and to take measures to fence and secure the archaeological site. On 24 November 2011, the Committee of the Directorate-General “Inspectorate for the Protection of Cultural Heritage” at the Ministry of Culture noted, among others, the necessity “to preserve and exhibit the mortar bonded wall adjacent to the Basilica of the Holy Mother of God Eleusa and the accompanying stone paving for the walkway east of it.”

It is to note that no mention was made regarding the preservation and presentation of the two ancient graves (6th-7th centuries) of the necropolis documented in 2006, neither of the two graves from the 14th century, neither of the late Hellenistic period white mortar-lined, pear-shaped pit, which characterized “the most significant archaeological structure cleared and documented”.

However, the Committee of the Directorate-General recommended: “In view of the complex nature of the immovable cultural property uncovered in separate sections on the northern coast of the peninsula, to look for opportunities to carry out larger-scale and comprehensive archaeological investigations, as well as for their conservation, restoration and socialization, and the study of the site located between Zoned Land II - 695, quarter 18a and the Basilica of the Holy Mother of God Eleusa is of paramount importance”.

The note on the “Results of archaeological research carried out on the territory around the monastery with the church of the Holy Mother of God Eleusa” received from the State Party following the mission, informs that “it was recommended that the exposed structures mortar bond wall and accompanying stone pavement – pathway to the east of it, uncovered during the 2010-2011 investigations, be preserved and exposed, which was done in the ground floor of the constructed multi-storey building, according to a design prepared and agreed with the Ministry of Culture”.

The building was erected in 2014-2015 (Fig. 41, 42). It is used as a hotel. In the Ministry of Culture's response regarding the construction of the building (additional information received from the State Party following the mission), an additional explanation is given as follows: “A project for change during construction under Art. 154 of the Spatial Planning Act (SPA) was also approved by the architect at the Municipality of Nessebar, who issued Order No. 106/01.07.2016 to supplement the building permit (issued 2007) with the change during construction. The submitted planning application under Art. 154 of the SPA provides for new window openings in residential and public spaces. An English courtyard is provided for the exposure of the archaeology uncovered within the boundaries of the property (and particularly within the boundaries of Zoned land II-695, landed property with identifier 51500.501.477 according to Cadastral map, quarter 18A, Kraybrezhna Str, Nessebar, Burgas district). Thus, during the construction, the ground floor has been allowed to be raised above the level of the road and windows to open on the side of the road (Fig. 42), in order to illuminate the lower floor “with the archaeological structures” .



Fig. 41. The development is finished, dominating over the remains of the Basilica of the Holy Mother of God Eleusa (2018, internet)



Fig. 42. The view of the building from the road behind it (August 2021, internet)

Comments

It is unclear how the archaeological structures could have been preserved in situ, when an additional second underground floor was constructed below the first underground floor, which was apparently permitted to be lighted as containing the archaeological structures. If indeed the archaeological structures have been preserved in the second basement, the meaning of

the permission given to raise the ground floor and create an English courtyard for the first basement is unclear. The mission team was not able to obtain clarifications on this matter.

Furthermore, it is unknown – it has not been inspected by the relevant national authorities – whether the on-site archaeological findings are properly conserved and maintained, in what condition they are and whether they are easily accessible to visitors of the lower floors of the privately-owned building, although the place is characterized as an archaeological site in the Automatic Information System – Archaeological Map of Bulgaria of the National Archaeological Institute with Museum, Bulgarian Academy of Sciences. It is to note that the hotel's advertising website (Villa Elea apartments in Nessebar) makes no mention of the archaeological remains within the grounds.

The fact that the State Party proposes minor boundary modification of the World Heritage property to, rightfully, include and better protect and preserve the nearby underwater part of the ancient road part, contrasts strongly with allowing, at the same time, to bury the ancient road's part greater in length on the peninsula, in an archaeological site right next to the basilica, in the basement of a newly built house.

The architectural solution ("English courtyard") allowed for the new building by the Municipality of Nessebar contradicts the architectural morphology of traditional houses in the Ancient City of Nessebar and is not found in any surveyed traditional house in the Ancient City. Moreover, the upper floor of the building is a superelevated illegal construction, above the two floors permissible on the coastal road (Fig. 43). This additional floor was built inside the roof and has a terrace extension. The relevant authorities have not intervened to oblige the owner to remove the illegal additional floor, as was done in some other cases in the buildings in the Ancient City.



Fig. 43. General view of the site during the mission

Conclusion

The fact that the construction of this multi-storey building, of inappropriate size, morphology and visual appearance, in a heritage-sensitive and archaeologically rich area and in immediate proximity to an Early Christian basilica, went ahead in spite of the moratorium on any new construction within the World Heritage property requested by the World Heritage Committee, demonstrates that the system in place to protect the OUV of the property is not adequate. The current legal framework and the operating inspection mechanisms of the State Party do not guarantee the protection of either one of the most important archaeological sites of the Ancient City, or its unique architectural heritage. The new building imposing itself on the Basilica of the Holy Mother of God Eleusa is incompatible with the values and attributes of the property.

MANAGEMENT AND OTHER ISSUES

1. Conservation and Management Plan

A draft Conservation and Management Plan for the property was finalized in 2012 and shared with the World Heritage Centre in 2013. In its Technical Review of the document of September 2013, ICOMOS concluded that “the Management Plan is a very well-developed tool and, if implemented, shall serve to ensure the long-term conservation and protection for the property”. The Technical Review further underlined that “considering the quality and completeness of the developed management, ICOMOS would strongly recommend that it be formally adopted so implementation of identified urgent actions and the first one-year programme, as well as the creation of the management authority, are commenced so that the proposed management system can become fully operational in the short term”. The same year, in its Decision 37 COM 7B.73 the World Heritage Committee urged the State Party to adopt and implement the Management Plan.

However, the Management Plan has never been adopted, and little progress has been made in its finalization. The State Party’s 2021 state of conservation report informs that an analysis of the draft Conservation Management Plan for the property has been carried out and recommendations issued. Following this, in its Decision 44 COM 7B.154 the World Heritage Committee reiterated its request to the State Party to finalize, adopt and implement the Conservation Management Plan.

The latest State Party’s state of conservation report mentions that the NIICH prepared Terms of Reference for the design of the Conservation and Management Plan for the property and that it is planned that the draft Plan will be prepared by the Institute with the involvement of external experts on civil contracts within six months after the award. At the time of the mission, a public procurement procedure to hire such experts was yet to be launched.

The finalization, approval, and entry into force of the Conservation and Management Plan for the property need to be achieved urgently. The mission team learned that the NIICH does not have the capacity to develop the Conservation and Management Plan on its own, due to its limited financial and human resources, hence the necessity of hiring a dedicated team. The mission encourages the State Party to take into account the provisions of the UNESCO Recommendation on the Historic Urban Landscape (2011) and the ICOMOS International Charter for Cultural Heritage Tourism (2022) when developing the Conservation and Management Plan.

In April 2022, the State Party organized an online seminar “Cultural Heritage for Sustainable Development with a Focus on the World Heritage Site – the Ancient City of Nessebar”, with the participation of ICOMOS International and the Bulgarian National Committee of ICOMOS. The seminar focused on the elaboration of the Conservation and Management Plan for the property, including its underwater cultural heritage component, and on the sustainable development of tourism in Nessebar. An expert of ICOMOS International provided advice on the management of public urban spaces in ancient cities, while the Honorary Chairman of the Bulgarian National Committee of ICOMOS underlined the main threats to the OUV of the property.

The Sustainable Tourism Development Programme for the property, for the period 2018 to 2024, has been adopted and presented in the State Party’s 2021 state of conservation report. It does not refer to the post-pandemic scenario.

The proposed Minor Boundary Modification to include underwater archaeological remains of the ancient town, which was submitted to the World Heritage Centre in January and will be examined by the World Heritage Committee at its 45th extended session, should not have hampered the development of the Conservation and Management Plan in the past years given that the main conservation issues are within the architectural ensemble of Ancient City.

2. Other plans

In its Decision 44 COM 7B.154 the World Heritage Committee reiterated its request to the State Party to finalize, adopt and implement the General Development Master Plan and the Detailed Development Plan. The development of the latter will take place, according to the State Party, on the basis of the former and after it has come into force. However, the General Development Master Plan, on which the Conservation and Management Plan for the property is also contingent, is in the process of being reworked following comments by the Ministry of the Environment and Water.

The Municipality of Nessebar indicated to the mission team that the challenging political situation in Bulgaria was affecting the development of the plan, while the representatives of the Ministry of Culture stressed that the Ministry was trying to invest its best efforts to speed up the finalisation of the plan. It was also mentioned that the Inter-Institutional Commission could speed up the procedures. Looking forward, this would be a test to see if the Commission is successful in accelerating the finalisation, adoption and implementation of the plans mentioned above, which should collectively ensure having an OUV-based vision for Nessebar in place and shared by different stakeholders.

As regards the General Plan for the Organisation of the Traffic (GPOT), it was adopted by the Municipal Council of Nessebar in January 2022. The validity period of the GPOT is 5 years, and in the absence of significant changes in the environment, its validity will be renewed for another 5 years. The GPOT contains the classification of the street network; routes of public passenger transport vehicles; traffic priorities; traffic direction; regime of stopping, parking, and speed limits; pedestrian and bicycle traffic and zones; prohibitions on the movement of goods vehicles; and a cartogram of traffic loads amongst other provisions.



Fig. 44a, 44b. Parking in the north coastal area during summertime with the extension to the north-east (Municipality's website)

According to plan No. 9 accompanying the GPOT, the car parking places are distributed as follows:

- 79 places near the Fishing Port to the north (Fig. 44a, 44b);
- 396 places in the north coastal area;
- 10 places in the Marina 1 and Marina 2 south ports;
- 33 taxi places, near the old city entrance and in the south port.

The newly approved plan (GPOT, Order No. 41/18.01.2022) provides for a total of 568 parking places, while according to the local authorities, the number of motor vehicles whose owners' permanent address is in the Ancient Town of Nessebar is 480 (as of 01.01.2023).

Recommendations

- In general, any type of parking within the protected Ancient City should be prohibited.
- Parking of visitors' cars should be confined to the mainland, in combination with the creation of a hub for traffic interchange; visitors will then be able to reach the Ancient City by rapid public transportation (electric buses), on foot, by cycling or by taxi;
- There should be entrance times for residents and business delivery to avoid traffic during the day;
- Parking places for permanent residents' cars should be limited to a part of the north coast and a smaller one on the south coast, for a strictly defined number of cars;
- Limited parking places should be assigned in the area around the Fishing Port for its needs;
- Limited parking places near the southern ports should be only for the needs of the ports and not for commercial use;
- Provision should be made for a limited number of parking places for taxis at the entrance to the Ancient City;
- Permits should be associated with the vehicles registered in the municipality and access controlled through car plate reading tools.

The mission therefore recommends that the GPOT is revised in line with the above comments.

3. Financial and human resources

Context

It is regrettable that adequate financial and human resources have not been made available for the conservation and management of the property. Firstly, the National Institute for Immovable Cultural Heritage does not have sufficient human resources, which impacts on its capacity to develop the urgently needed Conservation and Management Plan for the property on its own, having to hire a team of external experts to draft it. Secondly, the Nessebar – World Heritage Department consists of only six experts, including an architect and an archaeologist. Thirdly, two medieval churches in Ancient Nessebar await funds for their restoration and conservation. Lastly, significant human and financial resources are required to redress the critical situation with vernacular architecture.

The Nessebar – World Heritage Department performs the functions of a municipal authority governing the activity of safeguarding immovable cultural values on the territory of the Ancient City of Nessebar and plans the cultural policy of the municipality. 29 people work full-time at the Old Nessebar Museum, of which there are 8 specialists, 1 administrative official, 17 officials providing services to the population and 3 people as auxiliary staff.

The Ministry of Culture finances the long-term program of the Centre for Underwater Archaeology to conduct underwater archaeological research. Nessebar Municipality has financed various projects, including a rescue archaeological survey in connection with the redevelopment of Severna Buna port, the project "Conservation, restoration, exposure and adaptation based on authentic data of the Windmill, Nessebar", and a number of exhibitions. The Ancient Nessebar Museum is financed from its own resources as well as with funds from the Nessebar Municipality and the Ministry of Culture that have been used, for example, for

the 2022 restorations of icons of Jesus Christ and St Theodore Tyrone. Moreover, the Ancient City of Nessebar receives additional financial support from national and international donor programs and funds.

In 2021, Nessebar Municipality applied to the Programme “Regions of Growth 2014-2020” with a project proposal “World Heritage Site – Ancient City of Nessebar” for the improvement of immovable cultural property. In particular, the project aimed at the restoration, conservation, and exhibition of four cultural properties of national importance, including the Church of Christ Pantocrator and the Church of St. Michael and Gabriel the Archangels, and two windmills. However, the project could not secure funding due to the exhaustion of the financial resources under the programme.

Conclusions and recommendations

The State Party's efforts to invest resources to undertake underwater archaeological research in off the coast of the Ancient City of Nessebar are commendable. However, there is a need to allocate greater financial and human resources for conservation and management of the property. This is evident from the lack of human resources at the National Institute for Immoveable Cultural Heritage to develop the Conservation and Management Plan for the World Heritage property. It is also evident from the lack of financial resources available to Nessebar Municipality to undertake much-needed restoration and conservation measures and to provide financial support to the owners of the traditional architecture buildings needed for their rehabilitation.

Substantial means should be provided by the State Party in terms of human and financial resources in order to normalize the control procedures at the property and to ensure the faithful observance of legal procedures.

In the immediate term, these measures could involve strengthening an on-site control team with specialized human resources, which would cover all relevant disciplines and which would exclude permanent local/regional residents to avoid conflicts of interest.

The current state of the vernacular buildings underlines the necessity of exercising effective control during the restoration / reconstruction works at all stages of the implementation after the plans' approval, including construction procedure and the completion stage.

As a long-term measure, the State Party could explore introducing financial incentives, always in conjunction with the financial capabilities of the owners, for those who carry out building restoration projects in accordance with technical guidelines for interventions on traditional architecture, the strict instructions of the competent authorities and following thorough control at all stages of project implementation, such as:

- assistance by the competent authorities (NIICH) in the preparation of plans for the restoration of buildings;
- soft loans, involving favorable interest rates, pay-back period and pay-back conditions, use of forgivable loans;
- tax incentives: rate reductions, exemptions or credits and grace periods.

Some of these financial measures could also be applied to favour the longer-term plan of removing all illegal or legal but unacceptable constructions and modifications on vernacular buildings in order to recover original construction volumes, forms and materials.

It would be extremely useful to print and distribute to residents a booklet with explanations of the correct and permitted methods, materials and forms for the restoration of local traditional

houses, including examples of correct and incorrect interventions, in order to increase the owners' awareness and interest as well as the young population's educational awareness of the values that should be protected and that reflect the historical multi-cultural character and the exceptional natural environment of the World Heritage property.

4. High-level Inter-Institutional Commission

A permanent high-level Inter-Institutional Commission for the World Heritage property "Ancient City of Nessebar" was established by Decision 161 of the Council of Ministers of the Republic of Bulgaria of 24 March 2022. It is chaired by the Minister of Culture and consists, amongst others, of several Deputy Ministers (of Regional Development and Public Works, Transport and Communications, Tourism, and the Environment and Water), the Chairperson of the National Commission of the Republic of Bulgaria for UNESCO, the Governor of the Burgas Region, the Mayor of the Nessebar Municipality, and the Director of the NIICH. The Inter-Institutional Commission is assisted by an Expert Working Group, which includes experts from the Bulgarian National Committee of ICOMOS.

The Inter-Institutional Commission was established for the purpose of developing policies, proposals for legislative measures, agreement and coordination of decisions, plans and projects for the conservation and development of the Ancient City of Nessebar, as well as for monitoring the implementation of the recommendations and decisions of the World Heritage Committee in relation to the property. Its main tasks are to manage, supervise and coordinate the institutions involved in the conservation and development of the World Heritage property, to make proposals for changes in normative acts, and to monitor the approval and implementation of the management mechanisms, such as the Conservation and Management Plan, the General Spatial Plan of the Nessebar Municipality and the Detailed Spatial Plan of the Ancient City.

The Inter-Institutional Commission held two meetings in 2022 where the conservation and management problems of the Ancient City were discussed. It is hoped that the Commission will prove to be an efficient mechanism in the development of an OUV-based shared vision for Nessebar, to align all present and future decisions, plans and projects for the property's conservation, enhancement, and development. It is also hoped that the Commission will speed up the process of development, finalisation and adoption of the Conservation and Management Plan for the property and the General and Detailed Development Plans (outlined in the following issue), which are of the utmost priority and urgency.

It is to be noted, and this is underlined in the latest State Party's state of conservation report, that "the complex political situation in the country leads to serious difficulties with regard to the implementation of consistent policies for the protection of cultural heritage, including the Ancient City of Nessebar". Since 2021, Bulgaria held five parliamentary elections, most recently on 2 April 2023, after subsequent parliaments failed to establish a durable government. Thus, strengthening the legal framework to ensure special provisions related to World Heritage properties has proven to be challenging in the current circumstances. Moreover, frequent change of government has prevented reaching the stability needed for the implementation of medium and long-term measures to address the state of conservation of the property.

5. Underwater archaeological investigations

Context

The delimitation of the existing buffer zone (defined by the State Party in 1991 by Decree No. 174 of the Council of Ministers, approved by the World Heritage Committee in 2008 in Decision 32 COM 8D, and confirmed by the State Party in 2015 by Order No. RD9R-14/05.06.2015 of the Minister of Culture) is mainly based on the protective perimeters adopted and does not take into account the research of underwater archaeological structures.

The Centre for Underwater Archaeology at the Ministry of Culture has been very active over the past years and has undertaken underwater archaeological surveys needed to propose a Minor Boundary Modification as per Paragraphs 163 and 164 of the Operational Guidelines. At the time of finalising this report, a Minor Boundary Modification request had been submitted to the World Heritage Centre, considered as having met all the technical requirements outlined in the Operational Guidelines and was under evaluation by ICOMOS International, whose relevant recommendation will be examined by the World Heritage Committee at its extended 45th session.

The underwater archaeological investigations in the vicinity of Nessebar first undertaken in the 1960s and later resumed in 2015 by the Centre for Underwater Archaeology, were the basis for the proposed Minor Boundary Modification. The aim of the extension in the maritime part of the territory of the Ancient City of Nessebar is the inclusion of the archaeological structures which are integral and indivisible parts of the Ancient City, within the boundaries of the protected area of the property. The extension focuses on the following three areas, currently in the buffer zone of the World Heritage property:

North-west: vestiges of the 6th century Byzantine wall were identified and documented; its course coincides with the line of the main fortress wall on land protecting access to the peninsula from the west. Moreover, in the immediate vicinity of the underwater Byzantine wall a structure of stones stacked in a line about 70 m long was recorded.

South-east: seven underwater archaeological sections identified and documented, including

- the ancient Byzantine wall preserved in several massive fragments that can be traced over a distance of about 100 m;
- a fortress wall with a tower probably dating from the Late Classic or Hellenistic period;
- another 50 m-long fortress wall and 6x6 m tower from the same period;
- a hemicycle fortress wall made of large blocks preserved in a section of about 15 m whose base rests on the bedrock at a depth of 4.5-5.5 m, making it the deepest archaeological site of antiquity found in the Black Sea (it may refer to the first fortification system of Mesambria, before the foundation of the Greek colony);
- L-shaped breakwater consisting of stacked stones of different shapes and sizes, probably dating to Late Antiquity (5th-6th century) or later;
- Linear breakwater with stones with mortar and brick remains at its base, which places its construction in or after Late Antiquity.

South: vestiges of an ancient street running parallel to the contemporary shoreline at about 5m distance from it, covered with tightly packed blocks 30 cm thick; the preserved part measures about 3.2 m x 10.5 m.

The proposed Minor Boundary Modification entails an extension of 7.61 ha in the maritime part of the territory, which will be taken from the 1245.6 ha of the property's buffer zone and if approved, represent an increase in the total area of the World Heritage property of 28.08% (Fig. 45).

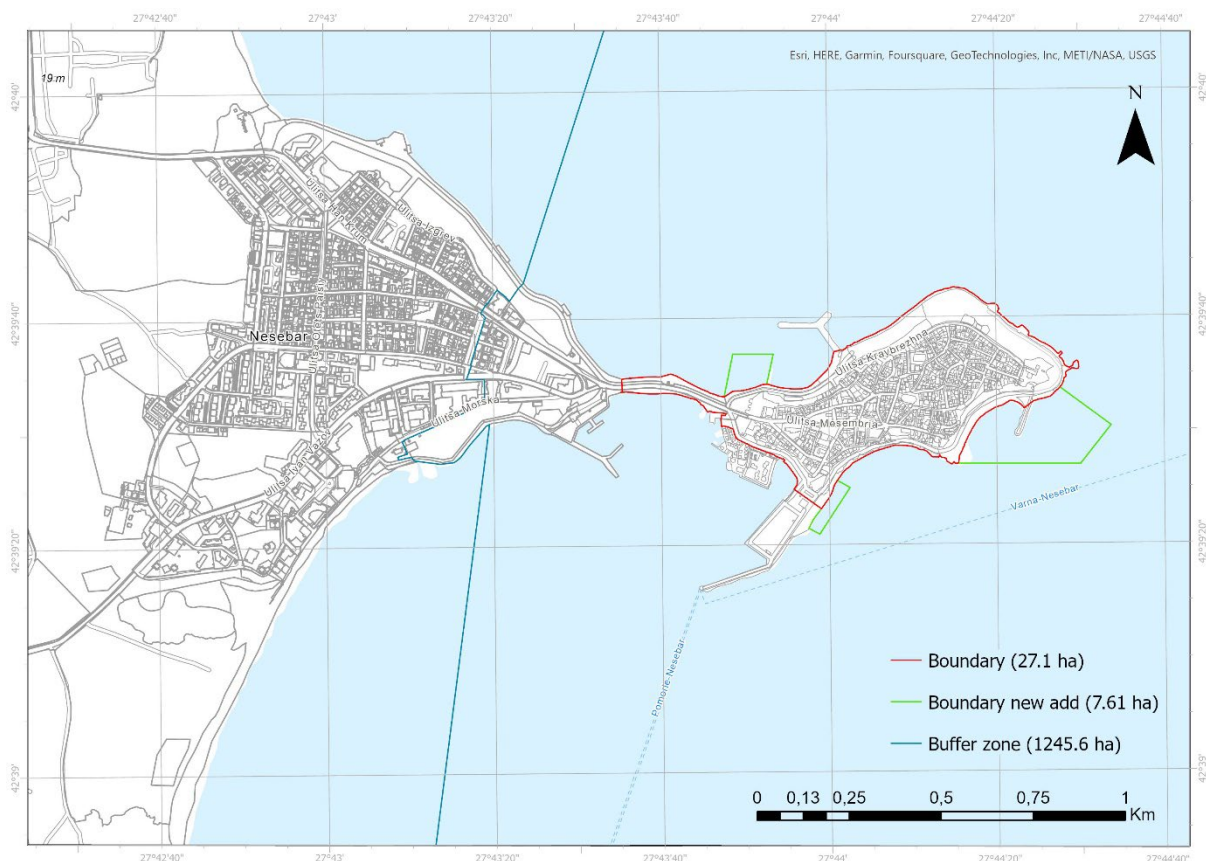


Fig. 45. Map with the boundaries of the property (red), its buffer zone (blue, to the left) and the proposed Minor Boundary Modification (green) to include the underwater archaeological remains

The thoroughly undertaken and documented underwater archaeological investigations are commendable and testify to the commitment of the State Party to document and increase the knowledge about the property's ancient history and to preserve and make known the vestiges of the ancient structures.

Comments

The proposal by the State Party of a Minor Boundary Modification of the property is in line with the recommendations of the 2015 ICOMOS Advisory mission, the 2017 joint World Heritage Centre/ICOMOS/UNESCO Scientific and Technical Advisory Body (STAB) Advisory mission, and the 2018 joint World Heritage Centre/ICOMOS Reactive Monitoring mission, as well as World Heritage Committee Decision 43 COM 7B.81 (2019) and Decision 44 COM 7B.154 (2021), to include all underwater archaeological remains of the ancient town.

The property is inscribed as the "Ancient City of Nessebar" and therefore, the parts of the ancient walls investigated and documented in the maritime area are an essential part of the Ancient City's cultural heritage and represent different periods of Nessebar's long history.

The proposed extended boundaries of the property are well defined on the maps presented to the mission team. The proposed extension significantly increases the area of protection of the Ancient City of Nessebar, namely by 7.61 ha. The proposed new protected archaeological sites in the maritime area are in contact with the existing coastline border area, enter the maritime area at a sufficient depth and contain important archaeological underwater finds

concerning the continuation of the ancient walls of the city. The extension will provide the possibility of their substantial protection.

Moreover, the work of the Centre for Underwater Archaeology in studying, identifying chronologically, to the greatest extent possible, and placing the underwater archaeological remains of the ancient town in specific time periods of construction (Thracian, Ancient Classical, Hellenistic, Roman, Byzantine) contributes to the enrichment of knowledge about (i) their building techniques, while adding new and essential elements to the history of the fortification system of the ancient city during various time periods; (ii) the stratigraphy of the city and its spatial development in specific historical periods, as a “unique testimony of a cultural and historical heritage in different aspects and in which many civilizations have left tangible traces”.

Until now, the image of the historical development of the city was limited to the terrestrial remains of the walls and the archaeological finds on land. However, it was known that over the centuries significant changes occurred in the coastlines of the peninsula, resulting in large parts of the walls and the city itself being sunk into the sea. Investigations and studies made by the Centre for Underwater Archaeology are valuable in this regard. The inclusion of the underwater archaeological remains of the ancient town into the World Heritage property will contribute to enhancing the attributes that convey its OUV. For the local residents as well as visitors to the property, these underwater archaeological remains provide possibilities for better understanding of Nessebar’s history, offering a more complete picture of the old fortification system, and create new opportunities for enjoyment by all of the area’s underwater wealth.

Recommendation for conservation and management

The State Party is recommended to develop regimes within the new boundaries, if approved by the World Heritage Committee, aimed at preserving and socializing the underwater cultural values. In particular, the Conservation and Management Plan of the Ancient City of Nessebar should include specific methods and regimes for the conservation of underwater cultural heritage, its management, interpretation and presentation, monitoring and control of impacts, as well as define institutional actors responsible for the specified underwater archaeological area as part of the OUV of the property and not as part of the buffer zone.

Conclusions and Recommendations

Conclusions

The existing state of conservation of the World Heritage property “Ancient City of Nessebar” points to the continued absence of appropriate legal, planning, monitoring, management and conservation mechanisms. Thirteen years ago, the World Heritage Committee, in its Decision 34 COM 7B.81 urged the State Party to immediately adopt all necessary measures aiming to ensure the safeguarding of the Outstanding Universal Value, integrity and authenticity of the property, monitoring and survey of the urban fabric, preparation, adoption and implementation of a management plan, urban master plan and a conservation master plan of monuments and archaeological sites. This request remains unfulfilled, with the exception of monitoring which is ongoing.

In line with the conclusions of the 2018 joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property, this mission concludes that the state of conservation of the property is impacted by a number of negative factors that represent both proven and potential dangers to the Outstanding Universal Value of the property, in accordance with paragraph 179 of the Operational Guidelines for the Implementation of the World Heritage Convention, and which threaten its authenticity and integrity.

The 2018 mission concluded that the attributes that conveyed the OUV of the property at the time of inscription have deteriorated or sometimes have been irredeemably spoiled, notably:

- the “tangible traces” of “numerous civilizations” are hardly discernible in the context of an urban environment and a coastal landscape that has undergone drastic changes;
- most of the typical townhouses that testified “the different stages of development of the characteristic wooden houses, which testify to the supreme mastery of the architecture of the Balkans as well as the East Mediterranean region” have been altered or transformed irretrievably;
- the “medieval churches” that are the most valuable and tangible portion of Nessebar’s heritage, whilst preserved and restored, no longer dominate the urban ensemble: these illustrious monuments are now overwhelmed by ordinary buildings and suffocated by trivial commercial activities – the spirituality of the town that was “a remarkable spiritual hearth of Christian culture” is definitely lost;
- the “urban fabric of the high quality” has lost its coherence and its historic appeal owing to the great number of minor alterations combined with the major transformation of the coast;
- the “vibrant urban organism” has been transformed for commercial purposes to service the beach resorts nearby: in the summer, it is suffocated by mass tourism interested in its restaurants and commercial facilities; for the rest of the year, it is almost abandoned.

All these changes have reduced the visual quality of the landscape and the coherence of the urban fabric and threaten the overall integrity of the property.

The 2023 Reactive Monitoring mission to the property has found that the state of conservation of the property has not improved and that comprehensive measures to reverse and eliminate potential threats to the OUV of the property have not been implemented. Moreover, while the State Party is in the process of implementing many recommendations of the 2018 Reactive Monitoring mission and some positive steps have been taken with regard to the implementation of the Committee’s Decision 44 COM 7B.154, in particular related to the finalization of the research necessary for a future Minor Boundary Modification to include all underwater

archaeological remains of the ancient town, little progress has been achieved in other regards. In particular, the documents requested from the State Party for examination by the World Heritage Committee at its 46th session (now – the extended 45th session), such as the Conservation Management Plan, Detailed Development Plan and General Development Master Plan, have not been submitted to the World Heritage Centre and are far from being finalized.

In line with the findings of the 2018 mission, the present mission ascertains that the property is faced with the specific and proven imminent danger in accordance with Paragraph 179 of the Operational Guidelines, and concludes that it meets the criteria for the inscription on the List of World Heritage in Danger, in particular:

- criterion a) iii) serious deterioration of architectural or town-planning coherence;
- criterion a) iv) serious deterioration of urban or rural space, or the natural environment;
- criterion a) v) significant loss of historical authenticity;
- criterion a) vi) important loss of cultural significance.

The property is also faced with other potential threats related to the following:

- criterion b) ii) lack of conservation policy;
- criterion b) iv) threatening effects of town planning.

As a final observation, addressing the problems of the Ancient City Nessebar is not just a matter of building permits however important they are, it is a matter of a long-term vision and strategic decisions about what can be developed in and around Nessebar, what the Ancient City should be in the future, how it will manage to maintain the attributes that convey and support the OUV of the property, and this concerns not only the Municipality and the Ministry of Culture, but the State Party as a whole. In other words, addressing these problems will require determined, concerted and focused action on different levels of the state, including its highest political level.

Recommendations of the mission to the World Heritage Committee

On the basis of the findings, analysis and conclusions, the mission recommends the World Heritage Committee to request the State Party the following:

1. Maintain a strict moratorium regime on new developments until the finalization and approval of the Conservation and Management Plan, General Development Master Plan and Detailed Development Plan.
2. Restrict possible interventions on the urban fabric and the peninsula landscape to emergency cases only (such as maintenance or reinforcement of buildings and structures in extremely unstable conditions) and to the rehabilitation and/or construction of the linear facilities.
3. Halt the use of previously issued permits until the individual and cumulative impacts of proposed developments have been assessed and the resulting Heritage Impact Assessment reports submitted to the World Heritage Centre, in accordance with Paragraphs 118bis and 172 of the Operational Guidelines for the Implementation of the World Heritage Convention, for review and comment by the Advisory Bodies, before any new irreversible developments take place.
4. Secure financial and technical resources for the consolidation, restoration and rehabilitation of vernacular buildings of national importance, as well as for the restoration of existing buildings of local significance, in line with the historically

established urban environment of Nessebar and with the aim of restoring the visual integrity of the city's vernacular architecture.

5. Develop efficient measures to encourage and support private owners of buildings in the maintenance and conservation/restoration of their buildings.
6. A long-term plan indicating priorities and timeframes for the removal of all illegal or legal but inappropriate constructions and modifications on vernacular buildings should be implemented to restore the authenticity of Nessebar's urban fabric, mindful that this will need a long time and strong commitment.
7. Undertake consolidation and stabilization measures for the Early Byzantine thermae, the archaeological complex near the Western Gate and the Old Bishopric, restoration of the floor of the Basilica of the Holy Mother of God Eleusa and the fortifications tower near the South Gate, as well as proper measures for the socialization of the sites.
8. Complete the process of declaring the Necropolis as an archaeological site and consider extending the buffer zone of the property to the west to include the main area of the Necropolis; consider using the Necropolis as an open and protected archaeological park with an underground archaeological museum, preserving the ancient graves in situ, and as a place of information and awareness for the visitors to the Ancient City of Nessebar.
9. Explore the possibility of the reacquisition of the land plot with the unfinished hotel construction and its subsequent removal in order to create an uninterrupted view from the Necropolis to the peninsula.
10. Develop a strategy for a recovery of the surrounding sea coastline in line with the objectives underlined in the mission report and based on the long-term visions of the General Development Management Plan, the Detailed Development Plan and the resulting land use organization of the area along the sea coastline.
11. Undertake a comprehensive programme of stabilization, conservation and restoration of the Church of Christ Pantocrator and the necessary restoration works in the Church of St. Michael and St. Gabriel.
12. Pursue efforts to develop the areas around the medieval churches free of commercial outlets and outdoor restaurants, so that these spaces contribute to enhancing the prominence of medieval churches and archaeology as attributes conveying the OUV of the property.
13. The future organization of uses in the southern ports should be the subject of a separate study, taking into consideration the specific ownership status of the ports, the appropriate use of the port buildings and facilities, and their proximity to the surrounding sensitive environment with medieval monuments and vernacular architecture.
14. A long-term plan to relocate the Nessebar Port Terminal and the Marina Nessebar facilities outside of the peninsula should be explored and pursued.
15. To achieve as a matter of urgency the finalization, approval and entry into force of the Conservation and Management Plan for the World Heritage property "Ancient City of Nessebar" in order to ensure the sustainable and equitable development and

management of the Ancient City and the conservation of the attributes which support and convey the property's OUV, as well as to address the existing threats to it.

16. In developing the Conservation and Management Plan, the State Party is encouraged to harness the participation of the local community and civil society and to build on the principles of the UNESCO Recommendation on the Historic Urban Landscape (2011) and the ICOMOS International Charter for Cultural Heritage Tourism (2022).
17. Submit the draft plans – Conservation and Management Plan, General Development Plan and Detailed Development Plan – to the World Heritage Centre for review and comments by the Advisory Bodies prior to their formal adoption.
18. Revise the General Plan for the Organisation of the Traffic in accordance with the recommendations provided in this mission report, to minimise the impact of tourist-related traffic on the cultural heritage of the Ancient City.
19. The High-level Inter-Institutional Commission should intensify its efforts towards the development of an OUV-based shared vision for Nessebar, to align all current and future decisions, plans and projects for the property's conservation, enhancement and development; these efforts should include accelerating the process of development, finalisation and adoption of the Conservation and Management Plan for the property and the General and Detailed Development Plans, which are of the highest priority and urgency.
20. Develop regimes within the new boundaries, if approved by the World Heritage Committee, aimed at preserving and socializing the underwater cultural values. In particular, the Conservation and Management Plan of the Ancient City of Nessebar should include specific methods and regimes for underwater cultural heritage conversation, management, interpretation and presentation, monitoring, and impact, and define the institutional actors responsible for the specified underwater archaeological area as part of the OUV of the property.

Lastly, the mission makes a recommendation to the World Heritage Committee that the property fulfils the criteria for inscription on the List of World Heritage in Danger, in line with Paragraph 179 of the Operational Guidelines.

Annexes

Annex I: Terms of Reference of the mission

Terms of Reference

Joint WHC/ICOMOS Reactive Monitoring mission to the World Heritage property “Ancient City of Nessebar” (Bulgaria) 16-20 January 2023

Background:

The World Heritage property “Ancient City of Nessebar” (Bulgaria) was inscribed on the World Heritage List in 1983 under criteria (iii) and (iv).

The last mission to the property was the joint World Heritage Centre/ICOMOS Reactive Monitoring mission, which took place from 22 to 26 October 2018. There was a previous Advisory mission in 2017 and a previous Reactive Monitoring mission in 2012.

In its Decision 44 COM 7B.154 (Fuzhou, China/online meeting, 2021), the World Heritage Committee requested the State Party to invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property. The State Party extended its invitation for such mission by the letter of the Minister of Culture of the Republic of Bulgaria, received by the World Heritage Centre on 2 November 2022.

In line with the same Decision, the State Party submitted the state of conservation report for the property on 30 November 2022.

Purpose of the Reactive Monitoring mission:

As per Decision 44 COM 7B.154, the purpose of the Reactive Monitoring mission to the World Heritage property “Ancient City of Nessebar” (the Mission) is to assess its state of conservation and ascertain the progress made by the State Party in implementing the Committee’s Decisions and the recommendations of previous missions.

With regard to this purpose, the mission shall:

1. Consider and advise the State Party regarding an appropriate strategy for the future of Nessebar, based on the sustainable, equitable development of the town and conservation of the attributes which support and convey the property’s Outstanding Universal Value (OUV);
2. Evaluate progress with the establishment of a high-level inter-ministerial or steering committee, supported by a working group and relevant institutions, tasked with the development of an OUV-based shared vision for Nessebar to align all present and future decisions, plans and projects for the property’s conservation, enhancement and development;
3. Review the current Conservation Management Plan for the property, which incorporates an updated Sustainable Tourism Management Plan, and assess progress

with its finalisation, adoption and implementation, and whether the Sustainable Tourism Management Plan appropriately addresses the post-pandemic scenario;

4. Review the current version of the Detailed Development Plan and the General Development Master Plan, including guidelines for urban design, having particular regard to how these documents address the attributes which support and convey the OUV of the property;
5. Evaluate progress with implementation and monitoring of the General Plan for the Organisation of the Traffic in the Ancient City of Nessebar;
6. Assess the adequacy of the financial and human resources available for conservation and management of the property and in particular the effective implementation of the Conservation Management Plan, Detailed Development Plan, and updated General Development Master Plan;
7. Review and assess progress with implementation of the recommendations of the 2018 joint World Heritage Centre/ICOMOS Reactive Monitoring mission as well as any previous mission recommendations that are yet to be addressed;
8. Review the results of underwater archaeological investigations and evaluate progress towards the future Minor Boundary Modification requested by the World Heritage Committee, in accordance with Paragraphs 163 and 164 of the *Operational Guidelines*, so as to include all underwater archaeological remains of the ancient town, and offer any observations or recommendations which may assist with this process;
9. Assess the overall state of conservation of the property and evaluate factors and conservation issues that could potentially impact on its OUV, including its conditions of integrity, protection and management;
10. Consider the impact or potential impact of construction projects that have been carried out or are planned within the property, its buffer zone or in its wider setting, in terms of impact or potential impact on OUV.

Based on the above, the mission shall make a specific finding and, if appropriate, make a recommendation about whether property fulfils the criteria for inscription on the List of World Heritage in Danger, in line with Paragraph 179 of the *Operational Guidelines*.

The State Party (through its relevant national, regional and local organisations and authorities) should ensure that the mission receives all relevant information and documents enabling it to review and assess the issues listed in items 1-10 above, and that the mission is able to carry out on-site visits for a comprehensive inspection of the property.

The State Party is requested to facilitate necessary consultation through working meetings with stakeholders, including government authorities at the national and local levels, the property management authority, as well as representatives of the tourism industry and any other relevant stakeholder, NGOs and the local community, and facilitate field visits to key locations within the property and viewpoints over the property in the wider setting.

To enable the mission's preparation, the State Party should cooperate with the World Heritage Centre and ICOMOS in preparing a detailed mission programme and a list of persons and institutions to be consulted, which should be submitted to the World Heritage Centre in draft form for review as soon as possible.

The following documents (translated into English where necessary) should be provided to the World Heritage Centre as soon as possible prior to the mission:

- a) Management and planning documents, including the draft Conservation Management Plan for the property, the current Sustainable Tourism Management Plan and the draft General Development Master Plan;
- b) Existing legal regulations concerning the property (heritage and planning laws, decrees and policies), a succinct summary of these legal regulations, and relevant information about any proposed changes or new legal regulations;
- c) Documentation and information concerning the management authority, including its organization chart, mission statement, and details on human and financial resources and operational relationship to other organizations;
- d) A definitive list and available information about existing, and known and potential future major projects (development, construction, conservation, research, and tourism-related projects) within and around the property that may have impact on the OUV of the property, such as project designs, locations, and impact assessments, including for the North Coast aestheticization, construction of the Natural History Centre, and completion of the church building in the Black Sea r.a.;
- e) Comparative data, if available, enabling comparison between the overall state of the property at the time of inscription and at present.

In addition, prior to the mission, the State Party should provide the World Heritage Centre with any relevant updates concerning the state of conservation of the property that have not been transmitted to the World Heritage Centre in the past or have become available since the state of conservation report for the property submitted by the State Party on 30 November 2022, including any new documents and legislative tools and policies (translated where necessary).

Following the mission, the World Heritage Centre and ICOMOS will prepare a concise report for review by the World Heritage Committee at its 46th session. The mission report will follow the World Heritage Centre and Advisory Bodies' Reactive Monitoring mission report format.

In case additional information would be necessary as identified during the mission, it should be provided by the State Party two weeks after completion of the mission at the latest. The mission report will be made available to the State Party in final draft form to enable comment on potential factual errors.

Annex II: Last Decision of the World Heritage Committee

Decision 44 COM 7B.154 (Fuzhou, China/online meeting, 2021)

World Heritage Committee Decision 44 COM 7B.154

The World Heritage Committee,

1. Having examined Document WHC/21/44.COM/7B,
2. Recalling Decision **43 COM 7B.81**, adopted at its 43rd session (Baku, 2019),
3. Takes note of the progress of the State Party in implementing previous Committee decisions and mission recommendations, but notes with concern that some urgent matters are yet to be addressed as further detailed below;
4. Urges the State Party to devise a strategy for the future of Nessebar, based on the sustainable, compatible and equitable development of the town and the property's Outstanding Universal Value (OUV), and to submit it to the World Heritage Centre for review by the Advisory Bodies;
5. Reiterates its request to the State Party to:
 - a) establish as a matter of high priority a high-level inter-ministerial or steering committee, supported by a working group and by all relevant institutions, tasked with the development of an OUV-based shared vision for Nessebar to align all present and future decisions, plans and projects for the property's conservation, enhancement and development,
 - b) finalize, adopt and implement the Conservation Management Plan which incorporates an updated Sustainable Tourism Management Plan, the Detailed Development Plan and the General Development Master Plan, including guidelines for urban design, based on the OUV of the property, as well as continue enforcing the existing protection regimes,
 - c) continue to allocate financial and human resources required for effective implementation of the updated Conservation Management Plan and updated General Development Master Plan,
 - d) continue to implement the recommendations of the 2018 joint World Heritage Centre/ICOMOS Reactive Monitoring mission as well as all previous mission recommendations that are yet to be addressed;
6. Requests the State Party to promptly finalize, approve and implement the General Plan for the Organisation of the Traffic in the Ancient City of Nessebar and to monitor its application and outcomes;
7. Takes note with satisfaction of the results of the underwater archaeological investigations and also requests the State Party to promptly finalize the research necessary for a future Minor Boundary Modification request, per Paragraphs 163 and 164 of the *Operational Guidelines*, to include all underwater archaeological remains of the ancient town;
8. Also takes note of the proposal of the State Party to convert the recommended ICOMOS Advisory mission to the property into online workshops to be held in 2021, and invites the State Party and ICOMOS to agree on a suitable period for this activity;
9. Further requests the State Party to invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property to take place in 2022, or as soon as the

sanitary situation allows, to assess its state of conservation and ascertain the progress made by the State Party in implementing the Committee's decisions and missions' recommendations;

10. Finally requests the State Party to submit to the World Heritage Centre, by **1 December 2022**, an updated report on the state of conservation of the property, and submit to the World Heritage Centre for review by the Advisory Bodies, the Conservation Management Plan, Detailed Development Plan and General Development Master Plan for examination by the World Heritage Committee at its 46th session, **with a view to considering, in the absence of substantial progress, the possible inscription of the property on the List of World Heritage in Danger.**

Annex III: Composition of the Mission Team

- Irena Caquet, Programme Specialist, Europe and North America Unit, World Heritage Centre, UNESCO
- Alkiviadis Prepis, ICOMOS Advisor

Annex IV: Itinerary and programme of the mission as implemented

The mission spent two and a half days in Nessebar, with the remaining time devoted to meetings in Sofia.

16 January

- Arrival in Sofia
- Meeting at the Ministry of Culture with Mr Plamen Slavov, Deputy Minister of Culture, Mr Boris Danailov, Head of the Political Office of the Minister of Culture, Mr Petar Petrov, Director of the National Institute of Immovable Cultural Heritage (NIICH), and experts from the Ministry and the Institute

17 January

- Transfer by minibus to Nessebar
- On-site visit of the Ancient City of Nessebar (accompanied by Mr Nikolay Dimitrov, Mayor of Nessebar Municipality, and representatives of the Ministry of Culture, the NIICH, the Nessebar Municipality, the Centre for Underwater Archaeology, and the Directorate “Maritime Administration – Burgas”)
- Meeting with Mr Nikolay Dimitrov, Mayor of Nessebar Municipality, and representatives/consultants of the municipal administration and the Museum “Ancient Nessebar”

18 January

- On-site visit of the buffer zone and continuation of the visit of the World Heritage property
- Visit of the Museum “Ancient Nessebar”
- Meeting with representatives of the District Directorate for National Construction Supervision, Southeast Region – Burgas, and the Regional Inspector of the Southeast Region, Inspectorate General for Cultural Heritage Protection at the Ministry of Culture
- Meeting with representatives of NGOs from Nessebar (with participation of Ms Maria Neykova, Burgas Regional Governor, and Mr Nikolay Dimitrov, Mayor of Nessebar Municipality)

19 January

- On-site visit of the Ancient City of Nessebar (continuation): visit of the peninsula shoreline
- Meeting with Mr Kalin Dimitrov, representative of the Centre for Underwater Archaeology, and representatives of the NIICH, on the proposal of minor boundary modification
- Transfer by minibus to Sofia
- Meeting with the Bulgarian National Committee of ICOMOS: Ms Gabriela Semova, President, Mr Todor Krastev, Honorary Chairman, and other representatives

20 January

- Meeting with Mr Velislav Minekov, Minister of Culture, Mr Plamen Slavov, Deputy Minister of Culture, and other representatives of the Ministry, as well as the President and the Honorary Chairman of the Bulgarian National Committee of ICOMOS
- Working lunch with Mr Angel Bandzhov, Director of the Human Rights Directorate at the Ministry of Foreign Affairs, Ms Emanuela Tomova, Secretary-General of the National Commission of the Republic of Bulgaria for UNESCO, and Ms Zornitza Grekova, Deputy Permanent Delegate of the Republic of Bulgaria to UNESCO
- Departure from Sofia

Annex V: List of people met

Ministry of Culture

- Velislav Minekov, Minister of Culture
- Plamen Slavov, Deputy Minister of Culture
- Boris Danailov, Head of the Cabinet of the Minister of Culture
- Ekaterina Djumalieva, Director of the Directorate “Cultural Heritage, Museums and Visual Arts”
- Margarita Trendafilova, Chief Expert, Department “Immovable Cultural Heritage“, Cultural Heritage, Museums and Fine Arts Directorate
- Nikoleta Marinova, Chief Expert, Department “Immovable Cultural Heritage“, Cultural Heritage, Museums and Fine Arts Directorate
- Maya Nalbantova, Expert, Department “Immovable Cultural Heritage“, Cultural Heritage, Museums and Fine Arts Directorate
- Daniela Kaneva, State Expert, Directorate “International Cooperation, European Programmes and Regional Activities”
- Maria Demireva, Regional Inspector, Southeast Region, General Directorate “Inspector for the Protection of Immovable cultural heritage”

National Institute for Immovable Cultural Heritage (NIICH)

- Petar Petrov, Director
- Aleta Guadelli, Chief Expert
- Ireha Hristova, State Expert
- Uliana Maleeva, Former Director of Cultural Heritage, Museums and Fine Arts Directorate, Ministry of Culture

Ministry of Foreign Affairs

- Angel Bandzhov, Director of the Human Rights Directorate
- Emanuela Tomova, Secretary General, National Commission of the Republic of Bulgaria for UNESCO
- Zornitza Grekova, Deputy Permanent Delegate of the Republic of Bulgaria to UNESCO

Burgas Regional Administration

- Maria Neykova, Regional Governor

Municipality of Nessebar

- Nikolay Dimitrov, Mayor
- Valentin Dimov, Chief Architect
- Zlatin Chaushev, Head of Department “Nessebar – World Heritage”
- Nikolay Oreshkov, Chief Expert, Department “Nessebar – World Heritage”
- Klara Stoyanova, Director, Department “Urbanization, investments construction planning, building control regimes”
- Antoaneta Harizanova, Head, Department “Municipal budget and administrative license regimes”
- Todor Marvakov, Director, Museum “Ancient Nessebar”
- Atanas Pinkov, Expert, Consultant
- Milena Krachanova, Expert, Consultant

- Sonya Mileva, Expert, Consultant
- Galina Babeva, Director, Department “European, national policies and programs, and ecology”
- Diana Kondova, Head, Department “Tourism and promotion”

Maritime Administration Directorate – Burgas

- Mariya Nikolova, Chief Expert

Centre for Underwater Archaeology – Sozopol

- Kalin Dimitrov

Bulgarian National Committee of ICOMOS

- Gabriela Semova-Koleva, President, Assistant Professor, Department “History and Theory of Architecture”, Faculty of Architecture, University of Architecture, Civil Engineering and Geodesy (UACEG)
- Todor Krastev, Honorary Chairman
- Iva Dosseva, Deputy Chairperson, Institute of Art Studies, Bulgarian Academy of Sciences
- Yordanka Kandulkova, Lecturer, Department “History and Theory of Architecture”, Faculty of Architecture, UACEG
- Julia Valeva, DSc emerita, former member of the Institute of Art Studies, Bulgarian Academy of Sciences, member of the Executive Committee of ICOMOS
- Velina Pandjarova, Lecturer, Department “History and Theory of Architecture”, Faculty of Architecture, UACEG
- Donika Georgieva, Architect, Assistant Professor, UACEG
- Emilia Kaleva, Assistant Professor, Department “History and Theory of Architecture”, Faculty of Architecture, UACEG
- Valentina Edreva, Assistant, Faculty of Architecture, Luben Karavelov University of Civil Engineering
- Petkana Bakalova, member of the Executive Committee of ICOMOS
- Todor Bulev, Chairman, Union of Architects in Bulgaria

NGOs met in Nessebar

- NGO “Mesembria 2020”
- Organization of hoteliers in the city of Nessebar
- Community Center and Library “Jana Luskova”
- Balkan Heritage Foundation

Annex VI: Statement of Outstanding Universal Value of the property

Brief synthesis

The Ancient City of Nessebar is a unique example of a synthesis of the centuries-old human activities in the sphere of culture; it is a location where numerous civilizations have left tangible traces in single homogeneous whole, which harmoniously fit in with nature. The different stages of development of its residential vernacular architecture reflect the stages of development of the architectural style on the Balkans and in the entire East Mediterranean region. The urban structure contains elements from the second millennium BC, from Ancient Times and the Medieval period.

The medieval religious architecture, modified by the imposition of the traditional Byzantine forms, illustrates ornamental ceramics art, the characteristic painted decoration for this age. The town has served for over thousands of years as remarkable spiritual hearth of Christian culture.

Criterion (iii): The Ancient City of Nessebar is an outstanding testimony of multilayered cultural and historical heritage. It is a place where many civilizations left their tangible traces: archaeological structures from the Second millennium BC, a Greek Black Sea colony with surviving remains of fortifications, a Hellenistic villa and religious buildings from the Antiquity, preserved churches (in some of them preserved only parts of archaeological structures) from the Middle Ages. Nessebar has demonstrated its historical importance as a frontier city on numerous occasions. Having been a remarkable spiritual centre of Christianity for a thousand years, today it is a developing and vibrant urban organism.

Criterion (iv): The Ancient City of Nessebar is a unique example of an architectural ensemble with preserved Bulgarian Renaissance structure, and forms a harmonious homogenous entity with the outstanding natural configuration of the rocky peninsular, linked with the continent by a long narrow stretch of land. Its nature and existence is a result of synthesis of long-term human activity, which has witnessed significant historic periods - an urban structure with elements from 2nd millennium BC, classical antiquity, and the Middle Ages; the development of medieval religious architecture with rich plastic and polychrome decoration on its facades in the form of ceramic ornamentation typical for the period; the different stages in the development of the characteristic residential vernacular architecture, which testify to the supreme mastery of the architecture of the Balkans as well as the East Mediterranean region. The vernacular architecture of the urban ensemble, dominated by medieval churches and archaeology, together with the unique coastal relief, combine to produce an urban fabric of the high quality.

Integrity

Within the boundaries that encompass the small rocky peninsula, are all the evidence of the numerous cultural layers - from the 2nd millennium BC until the present time.

Although the main elements have generally remained unchanged, since 1986 some exceptions have occurred with a number of illegal interventions on 19th century structures, and some new buildings executed in violation of the Cultural Heritage Law.

In addition, and in violation of the Law on Monuments and Museums, negative influences have also emerged with the emergency stabilization of the peninsula shoreline. All of these changes

have the potential to threaten the extraordinary coherence of the urban fabric and the overall visual integrity of the property.

Authenticity

Only conservation and stabilization work is carried out on the Medieval Churches, and all the investigated archaeological sites are exposed and preserved. Some Medieval Churches now require repair. The unauthorized changes to some of the vernacular buildings, and persistent and increasing pressures from tourism, public and residential functions, and investment interests, combined with the introduction of mobile retail units, are beginning to threaten the traditional urban structure of the city, its architectural appearance, and its atmosphere.

Protection and management requirements

Management is implemented by virtue of:

1) Cultural Heritage Law (Official Gazette No.19 of 2009) and subdelegated legislation. This law regulates the research, studying, protection and promotion of the immovable cultural heritage in Bulgaria, and the development of Conservation and Management plans for its inscribed World Heritage List of immovable cultural properties.

2) Ordinance No.8 of the Culture Committee and the Committee on Architecture and Public Works of the architectural historical reserves Sozopol and Nessebar /SG 9/1981; covers the issues of general and detailed spatial planning; projects; carrying out conservation and restoration works; and new building. It also determines the borders and contact zones of the site, the main principles involved, and sets out the rules for protection and implementation.

3) Developed by the National Institute for Monuments of Culture /in 2009 renamed as National Institute for Immoveable Cultural Heritage/, the Directive Plan is a Concept paper on the preservation and development of the cultural-historic heritage of the town of Nessebar. The Plan offers an integrated professional analysis and prognosis of urban development over a wide range of activities. Ostensibly contributing to the protection, promotion and sustainable development of the property, the document, unfortunately, does not fully reflect current conditions, and requires up-dating.

4) The current Construction and regulatory plan of the Ancient City of Nessebar, adopted in 1981, and the preliminary construction and regulatory plan (adopted on 30.07.1991 by the Ministry of construction and urban planning) regulates land use, types of building, parks and gardens etc.

5) The Spatial Planning Act - (Official Gazette, No. 1 of 2001 with amendments) and subdelegated legislation relates to spatial and urban planning, investment projects and buildings in Bulgaria. It also determines particular territorial and spatial protection, and the territories of cultural heritage.

In order to provide adequate response to the threats from unauthorized development, pressure from tourism and new uses, there is a need to put in place an overall Management Plan for the property that provides a collaborative framework for all stakeholders.

Annex VII: Recommendations of the 2018 joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property

The recommendations of the 2017 Advisory Mission have only partially been acknowledged and implemented by the State Party, and they are therefore integrated into the 2018 Reactive Monitoring Mission recommendations, as follows.

Main recommendations: research, conservation and restoration of monument

1. Pressure continues to affect the restored byzantine churches and the remains of those that still need restoration within the property. The Municipality should undertake effective measures to create around the monuments public spaces properly paved and conveniently arranged in the simplest way, reserved for pedestrians and inaccessible to cars, where street retailing and outdoor restaurant areas are not allowed. The State Party should undertake a project for the restoration of the religious remains that are still waiting for being studied and properly maintained.
2. Research of the remains of ancient Mesambria must continue; in the meanwhile, no intervention on the sea bed that may affect them should be undertaken and navigation should be controlled. The State Party must assure financing in order to give the Ministry of Culture the possibility of launching a new campaign of studies and underwater explorations. The main goal is protection but special attention should be put in making submerged Mesambria better known and possibly more visible to the public.
3. Traditional architecture (typical townhouses) is a significant attribute of the property which is badly maintained and severely lessened and therefore needing further protection and specific measures for its rehabilitation and enhancement. Controls aimed at removing illegal parts of the buildings and restoring their previous aspect should be reinforced. A special programme of restoration is needed: private owners should be encouraged to intervene by means of financial support and provided with guidance for correct restoration and maintenance of the buildings.

General recommendations concerning planning and programming

A national strategy for the Ancient City of Nessebar is required. The different bodies of the State Party should permanently and strictly cooperate for assuring the protection of the property, taking into consideration its Outstanding Universal Value, its specific seascape setting and its coastal landscape and aiming to promote the appreciation of this heritage at the national and international level.

The approval of the Management Plan is the first indicator that the State Party is deploying this strategy. All the amendments needed in order to make Management Plan compliant with national regulations should be completed in the shortest time.

A new Urban Plan is urgent as well; but, because it will take time for this procedure to be accomplished, the special regulation for the Ancient City should rapidly come on force; projects for the arrangement of the public spaces and rehabilitation of the peninsula waterfront should be anticipated as essential parts of the plan itself. While waiting for the new Urban Plan, a general moratorium is needed: new constructions in the peninsula must stop until the Plan is approved.

Particular care must be dedicated to enhance at any level knowledge and appreciation of Nessebar heritage. A programme should be developed to help inhabitants become more sensitive and informed and to encourage their participation to the rehabilitation process. The plan for sustainable tourism should be revised with the aim to increase concern for heritage among the tourists and foster all-year-round cultural tourism. Education is a priority: programmes should be implemented with schools, in order to generate interest in heritage among the younger generations; young researchers should be encouraged and awarded to dedicate their studies (e.g. PhD thesis) to Mesambria / Nessebar.

Immediate and short term measures

- Establish a multi-stakeholders Evaluation Committee for protection of the World Heritage property Ancient City of Nessebar with a decision-making power (not advisory) and place its decision-making authority at the highest national level. It should be composed of all stakeholders, including the representatives of all Ministries and State authorities concerned and other relevant local authorities. The Evaluation Committee should be responsible for the review of the permits previously issued by the Municipality and of all the development proposals prior to the issue of any new permits for any project.
- Complete the ongoing inventory of the heritage of the property.
- Inventory all permits issued by the Municipality of Nessebar for all development / infrastructure / urban transformation projects within the property and its setting.
- Introduce as a matter of urgency all relevant legal measures to immediately halt the use of previously issued permits until the cumulative impact of proposed developments, together with Heritage Impact Assessments have been submitted to the World Heritage Centre, in conformity with Paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention* (UNESCO, 2017), for review and comments by the Advisory Bodies, before any further irreversible developments occur.
- Introduce an operational legal framework to prevent further inappropriate developments within the peninsula, including urgent measures to halt irreversible transformations of the houses that alter the shape, the external aspects, the materials and the definition and organization of the internal spaces.
- Intensify regulations aimed at the detection of transformations of private houses and of those houses that require restoration (a reinforcement of the personnel acting control is needed).
- Halt all ongoing and new development/construction works and the issuing of construction permits until the urban planning documentation has been adopted on the basis of the national strategy for the protection of the World Heritage property Ancient City of Nessebar, and control and monitoring at the State level is fully in place. Restrict any possible interventions on urban fabric and the peninsula landscape to emergency cases only (such as maintenance or reinforcement of buildings and structures in extremely dangerous conditions), to the rehabilitation and/or construction of the linear facilities (road, gas pipeline, pipeline, power line, communication line etc.), as well as to the restoration works of the existing buildings and structures that do not cause dissonance and are in line with the historically-established urban environment of Nessebar.
- Organise meetings for raising awareness of concerns about the heritage and discuss opportunities of enhancement with stakeholders and inhabitants. Develop and implement

educational programmes with schools for promoting knowledge and respect for heritage among young people.

- Develop an awareness-raising campaign for private owners for promoting the conservation of the townhouses and verifying the possibilities for uses that envisage the presence of the public or are compatible with temporary visits.
- Approve regulations and install devices that can prevent car traffic and parking in sensitive areas (in the vicinity of churches, in lanes with typical townhouses, and on sea promenades).

Second term measures (2-4 years)

- Develop and adopt a plan for the rehabilitation of the historic urban landscape of the peninsula, including legal measures for compulsory removal of all inappropriate (legalised and illegal) adjustments to the 19th century houses and measures for encouraging the requalification of modern buildings.
- Develop efficient measures to encourage and support private owners of buildings and building entrepreneurs in the maintenance and conservation/restoration of their buildings: develop and introduce a handbook with building guidelines and practical examples for the correct maintenance and restoration of the historic houses; support the restoration of townhouses, including the possibility of providing direct financial support or tax incentives.
- Introduce amendments to the current draft Management Plan to reflect the statutory regime, available resources and relevant Mission recommendations (2010 to 2018), and incorporate a first 5-year implementation plan supported by a financial plan. Adopt and implement this preliminary 5-year Management Plan as a matter of great urgency.
- Approve and set up a new general Master plan for Nessebar, which defines a set of regulations for all planned developments within the peninsula, to be adopted for the recovery and preservation of the Outstanding Universal Value of the property and its associated historic urban landscape and seascape values. In the process of development of the new urban planning documentation of the Nessebar municipality, priority shall be given to the **interests of protection of the Outstanding Universal Value of the World Heritage property** and the needs of protection of its historical urban landscape, as well as ensuring those proper conditions for the World Heritage property to protect in the best way its Outstanding Universal Value.
- Intensify the programme of underwater archaeological research.
- Finalise the research on ship graffiti and launch a programme of protection, conservation and communication of this heritage.
- Define a new tourism strategy based on cultural and religious tourism, oriented to limit the impact of mass tourism in summertime and to promote the all year round, low impact presence of visitors in the peninsula.
- Develop a new mobility plan, including the creation on the mainland of a hub for traffic interchange (between private car/bus traffic, public transportation, soft -pedestrian and cycling – mobility), the organization of a public transport system for rapid connections between the peninsula and the mainland, and a more effective car traffic ban in the peninsula.

- Develop inter-ministerial contacts in order to reach an agreement for a better arrangement for the abandoned military spot located on the north-eastern waterfront of the peninsula; this area could be possibly opened to the public as a park.
- Develop and adopt a plan for the rehabilitation of the mainland waterfront, in order to avoid new massive developments that could impact negatively on the landscape and to create an adequate access to the Ancient City.
- Prepare a second-phase 20-year Management Plan, which addresses required long-term institutional, statutory and resourcing issues, including appropriate mechanisms for providing resources for conservation and incentives and support for Nessebar residents, and the possibility of statutory changes directed at the preservation and development of the Ancient City of Nessebar in a manner which conserves the Outstanding Universal Value of the property.
- Develop and implement appropriate measures, including facilities for renting/purchasing atelier-spaces and declaration of provenance, to support local craftsmen and traditional manufacturing.

Long-term measures

- Implement plans for the rehabilitation of the mainland waterfront: private cars and buses should stop there and the area should be properly arranged with green spaces and public utilities to support tourists and reduce impacts on the peninsula.
- Relocate the Nessebar Port Terminal, as well as the Marina Nessebar facilities, outside of the peninsula.

Final definition of boundaries

The final definition of the property's boundaries is a preliminary issue for implementing recommendations and making plans coherent. Several discrepancies occur in the documents issued at different times and by different subjects regarding the extension of the protected area. These discrepancies must be definitely eliminated.

The 2017 Mission recommended developing and submitting to the World Heritage Centre a boundary clarification document which specifies the boundary of the World Heritage property and its buffer zone in a high-quality resolution and in conformity with the requirements. This recommendation is strongly reiterated.

Annex VIII: List of documents received from the State Party to inform the mission

Documentation received prior to the mission:

1. State Party's State of Conservation Report of the Ancient City of Nessebar, 2021-2022
2. Report on "Heritage Impact Assessment for Investment Intent for a New Development in the Territorial Scope of the Ancient Necropolis of Mesambria, in the Security Area of the World Heritage Property "Ancient City of Nessebar""
3. Decision of the Council of Ministers for the formation of permanent Inter-institutional Commission, assisted by Expert Working Group, for the World Heritage Site "Ancient City of Nessebar"
4. Approval statement from the Ministry of Culture about the Terms of Reference for the elaboration of the Conservation and Management Plan (CMP) of the Ancient City of Nessebar
5. Assignment for the preparation of a Conservation and Management Plan of the Ancient City of Nessebar
6. Conservation prescriptions of the Ancient City of Nessebar and its buffer zone, 2015
7. Conservation prescriptions of the Ancient City of Nessebar with regard to urban design, 2015
8. Ordinance No. 10 on the Order and conditions for placing and removing removable sites, advertising-informational and monumental decorative elements on the territory of Nessebar Municipality
9. Maps: a concept scheme of advertising and informational elements in Ancient Nessebar, Nessebar Municipality:
 - a. A concept scheme for advertising elements and information system in Ancient Nessebar
 - b. Emplacement of the commercial advertising elements
 - c. Commercial advertising in Ancient Nessebar examples
10. Building permits, 2011-2022
11. List of project documentation stored in the National Document Archive of the NIICH for the territory of the world immovable cultural property "Ancient City of Nessebar" for the period 2021-2022
12. Results of the monitoring carried out by the National Institute for Immovable Cultural Heritage (NIICH):
 - a. Report regarding monitoring of the condition of sites with immovable cultural property status on the territory of Ancient City of Nessebar
 - b. Map: boundaries and zones with conservation prescriptions
 - c. Maps: classification of ICA, representatives of the vernacular architecture
 - d. Table summary information
 - e. Report on the state of the urban environment
 - f. Monitoring 2018 tables
 - g. Maps, scheme "Current state of the street structure" and scheme "Assessment of the interventions in the urban environment"
13. General Plan for the Organization of Traffic (GPOT) in the Ancient City of Nessebar
14. Proposal for the modification of the boundaries of the "Archaeological reserve and historic settlement – architectural and urban immovable cultural property Ancient City of Nessebar" sea area
15. Protocol for the boundary of the "Ancient City of Nessebar"
16. Map: boundaries of Nessebar

Documentation received following the mission upon request from the World Heritage Centre:

17. A comparative map of the World Heritage property “Ancient City of Nessebar” showing the modifications (buildings, structures) that have occurred between the year of the property’s inscription on the World Heritage List – 1983, and today, accompanied by a description
18. Results of the archaeological survey of the Ancient City of Nessebar
19. Statistical details on the human and financial resources of the management authority of the World Heritage property
20. List of the decisions adopted by the high-level Inter-institutional Commission for the World Heritage property “Ancient City of Nessebar”
21. A draft Strategy for the Cultural Heritage in Nessebar, 2023-2032
22. Statistical data on the number of residents within the World Heritage property and the number of registered vehicles
23. The needs of the permanent residents of the Old City in primary and secondary schools
24. Details of the 16 illegal constructions removed within the property since 2014
25. Detailed results of the archaeological investigation for the area of the monastery around the Basilica of the Holy Mother of God Eleusa
26. Details of the permission for the construction of the multiple floor building aside the Basilica of the Holy Mother of God Eleusa
27. The Sustainable Tourism Development Programme for the period 2018-2024 in Nessebar Municipality
28. Detailed results of the archaeological investigation for the area of the Ancient Necropolis
29. The ownership regime in the excavated areas of the Necropolis
30. Necropolis: maps of the location and extent of the 40 stone cist tombs that have been selected to be preserved and displayed
31. Documentation on the area of the Necropolis and on the monitoring status of the construction of new or repair of old buildings in the area

Annex IX: List of illustrations

- Fig. 1a, 1b, 1c, 1d, 1e, 1f. Vernacular architecture in the Ancient City of Nessebar
- Fig. 2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h. Inadequate new buildings and inappropriate modifications
- Fig. 3. The remains of the basilica next to the Western Gate are in a state of abandonment without any maintenance
- Fig. 4. New constructions and “rehabilitation” of old buildings in the immediate vicinity of the ruins of the Byzantine thermae complex, which remain in an emergency state of conservation
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- Fig. 26a, 26b. Part of the northern site (left, municipal ownership) and the southern site (right, private ownership) of the Necropolis excavation area

Fig. 27. The Necropolis of Mesambria Pontica: a plan of the areas excavated between 2007 and 2010 – location of the Necropolis of Mesambria Pontica, with its main area (shaded in pink) and its buffer zone (shaded in green), while the buffer zone of the property is indicated with the north-south blue line

Fig. 28a, 28b, 28c, 28d. Some of the most outstanding hydrias and gold artefacts discovered in the graves of the Necropolis

Fig. 29. The new hotel on the southern part of the area with a view to the sites with the archaeological excavations and to the peninsula is visible in the centre of the photograph to the left of the road

Fig. 30. The northern part of the excavation area facing south: present situation, with new hotels built inside the buffer zone of the property; to the left – the hotel that “incorporated” the traditional windmill, with new expansion constructions; the southern part (private ownership) of the archaeological site lies behind the row of the banners

Fig. 31. View of the hotel with the incorporated windmill before its subsequent illegal reconstruction

Fig. 32. Western border of the Necropolis, buffer zone of the property: hotel building with an imitation of a windmill on the facade

Fig. 33. View from the peninsula to the Necropolis, with tall buildings of new hotels in the background and the illegally reconstructed hotel (unfinished) seen to the right of the statue. The statue is an initiative of the Port Authority, which is under the Ministry of Transport, Information Technology and Communications

Fig. 34. The new development dominating over the remains of the Basilica of the Holy Mother of God Eleusa

Fig. 35. Mesambria, “Sea Basilica”, plan (after I. Velkov) in: R. Hoddinot, *Bulgaria in Antiquity*, 1975, fig. 100, p. 320

Fig. 36a, 36b. Icon “Holy Mother of God Eleusa” (137x107 cm), National History Museum, Sofia

Fig. 37. The north-eastern coast with the remains of the “Sea Basilica” and the ancient fortification walls (graphic presentation according to A. Kamenarov after Ognenova-Marinova, Chimbuleva A 80/1981, appendix No. 3)

Fig. 38. General view of the excavated site, from northeast, with stone cists graves and ancient stone walkway paving

Fig. 39. Karel Shkorpil archive (1921)

Fig. 40. Photo of the basilica site as in 2010 (internet)

Fig. 41. The development is finished, dominating over the remains of the Basilica of the Holy Mother of God Eleusa (2018, internet)

Fig. 42. The view of the building from the road behind it (August 2021, internet)

Fig. 43. General view of the site during the mission

Fig. 44a, 44b. Parking in the north coastal area during summertime with the extension to the north-east (Municipality’s website)

Fig. 45. Map with the boundaries of the property (red), its buffer zone (blue, to the left) and the proposed Minor Boundary Modification (green) to include the underwater archaeological remains