

**STATE OF CONSERVATION REPORT OF THE  
ANCIENT CITY OF NESSEBAR, BULGARIA (C 217)  
2023 – 2024**



**Inscribed on the World Cultural and Natural Heritage List under  
criteria iii and iv at the 7th ordinary session of  
the World Heritage Committee in 1983**

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## ABBREVIATIONS

|  |  |
|--|--|
| AMB  | Archaeological map of Bulgaria   |
| BAS  | Bulgarian Academy of Sciences  |
| BP   | Building plan  |
| BA   | Biodiversity Act   |
| BNC of ICOMOS                              | Bulgarian National Committee of the International Council on Monuments and Sites |
| BSCSPA                                     | Black Sea Coast Spatial Planning Act   |
| CH   | Cultural heritage  |
| CHA  | Cultural Heritage Act  |
| CHIA                                       | Cultural Heritage Impact Assessment  |
| CIP  | Complex investment project   |
| CMP  | Conservation and Management Plan   |
| CRW  | Conservation and restoration works   |
| CUA  | Centre for Underwater Archaeology at the Ministry of Culture                     |
| DDP  | Detailed Development Plan  |
| DNBC                                       | Directorate for National Building Control  |
| EAR  | Environmental Assessment Report  |
| EPA  | Environmental Protection Act   |
| EA „Port Infrastructure”                   | Executive Agency "Port Infrastructure"   |
| GD „Inspectorate for the Protection of CH“ | General Directorate “Inspectorate for the Protection of Cultural Heritage”       |
| GDP  | General Development plan   |
| GIS  | Geographic Information System  |
| GPTO                                       | General plan for traffic organization  |
| GICP                                       | Group Immovable Cultural Property  |
| ICH  | Immovable Cultural Heritage  |
| ICP  | Immovable Cultural Property  |
| ICOMOS                                     | International Council on Monuments and Sites                                     |
| LMSIWPRB                                   | Law on maritime spaces, inland waterways and ports of the Republic of Bulgaria   |
| MC   | Ministry of Culture  |
| MF   | Ministry of Finance  |

|                   |  |
|-------------------|--|
| MEW               | Ministry of Environment and Water  |
| MES               | Ministry of Education and Science  |
| MF „Culture”      | Municipal Fund „Culture”   |
| MFA               | Ministry of Foreign Affairs  |
| MRDPW             | Ministry of Regional Development and Public Works  |
| MT                | Ministry of Tourism  |
| MTC               | Ministry of Transport and Communications   |
| NAIM - BAS        | National Archaeological Institute with Museum at the Bulgarian Academy of Sciences                               |
| NatCom for UNESCO | National Commission for UNESCO - Bulgaria  |
| NBU               | New Bulgarian University   |
| NF “Culture”      | National Fund “Culture”  |
| NGO               | Non-governmental organization  |
| NICM              | National Institute for Cultural Monuments  |
| NIICH             | National Institute for Immovable Cultural Heritage   |
| NLM               | Natural landmark   |
| ORROITTDZ         | Ordinance on rules and regulations for the organization of individual types of territories and development zones |
| OUV               | Outstanding universal value  |
| PIMD              | Plan for Integrated Municipal Development  |
| PA                | Protected area   |
| PAA               | Protected Areas Act  |
| PCPCH             | Public Council for the Protection of Cultural Heritage   |
| RDNBC-Burgas      | Regional Directorate for National Building Control - Burgas  |
| REWI- Burgas      | Regional Environmental and Water Inspectorate - Burgas   |
| RF                | Research Fund  |
| RLP               | Regulated land property  |
| SPA               | Spatial planning Act   |
| SPLLSPL           | Sole proprietorship with limited liability   |
| SPL               | State Property Law   |
| SUOV              | Statement of the Outstanding universal value   |
| TDP               | Territorial development plan   |
| UNESCO            | United Nations Educational, Scientific and Cultural Organization   |
| WHP               | World Cultural Property  |



## **I. Executive summary of the report:**

This report reflects the implementation of **Decision 45 COM 7B.179** (item II of the report) and **Decision 45 COM 8B.70** (item IIa of the report) of the World Heritage Committee, as well as the recommendations of the missions conducted in the territory of the Ancient City of Nessebar in 2017, 2018, 2023.

**Under item 4:** In connection with the development of the Conservation and Management Plan (CMP) of the Ancient City of Nessebar in 2024, an up-to-date assessment of the state of preservation of the attributes of the Economic and Social Council (ESC) is being prepared, part of which is presented in the report, as well as information from previous assessments.

**Under item 5:** The activities undertaken by the Bulgarian State Party in 2023-2024 are briefly mentioned: Preparation of a Vision for the Ancient City of Nessebar 2025-2044 with a Road Map; updated Plan for integrated Municipal Development; adopted Cultural Heritage Strategy of Nessebar Municipality 2023-2032; established a Public Council for the Protection of Cultural Heritage at Nessebar Municipality; adopted minor modification of the boundaries of the Ancient City of Nessebar to include part of the water area and update the regimes for the protection of the World Heritage Site; granted status of archaeological cultural property to the Necropolis of Mesambria-Messebria and defined protection regimes; High Level Inter-ministerial Commission meetings held to discuss the development of the World Heritage Site; increased expert staff of the Ministry of Culture, the National Institute for Immovable Cultural Heritage and the Center for Underwater Archaeology.

**Under item 6:** two online meetings held in 2024 (on 5 May - expert meeting on the future of the Ancient City of Nessebar; on 28 June - consultative meeting for comments on the prepared “Vision” and “Roadmap”) between representatives of the WHC, ICOMOS, ICCROM, STAB to the 2001 Convention. On the Bulgarian side, representatives of relevant ministries, the National Commission for UNESCO -Bulgaria; NIICH, CUA; BNC of ICOMOS, National Archaeological Institute with Museum - Bulgarian Academy of Sciences, Burgas Regional Administration, Nessebar Municipality, the Directorate for National Supervisory Control.

**Under item 7:** by Decision No. 259 of No. 10/24.09.2024 of the Municipal Council of Nessebar, an update of the Plan for integrated Municipal Development with emphasis on the cultural heritage of the Ancient City of Nessebar was adopted.

**Under item 8:** a) a “Shared Vision for the Ancient City of Nessebar (2025-2044)” and a Roadmap have been prepared; c) a Terms of Reference for a Conservation and Management Plan and the structure of the plan have been prepared; an analysis and assessment of the status of the key attributes of the OUV has been carried out; the CMP is scheduled to be completed at the end of March 2025; d) the Conservation Regimes have been updated in 2023 and their compliance is being monitored.

**Under item 9:** the implementations by the State Party of the missions’ recommendations are reflected.

**Under Decision 45 COM 8B.70** of the World Heritage Committee and the recommendations of the missions on underwater cultural heritage: The decision adopted a minor modification of the World Heritage property boundaries to include part of the aquatic area. The protection and management of the underwater heritage is also an important theme in the Vision for the Future of the Ancient City of Nessebar, which will underpin the new CMP. In the objectives and measures of Priority Area 3: *Research, conservation and interpretation of underwater cultural heritage. Capacity building*” take into account all the recommendations of the World Heritage Committee decision and the missions. The CUA is implementing a “Research and Promotion of Underwater Cultural Heritage Programme” as well as a capacity building programme in cooperation with UNESCO. The activities for the implementation of the objectives foresee the preparation of Impact Assessments on the archaeological heritage under water for any development initiative affecting the coastline of the Ancient City of Nessebar, the organization and regulation of underwater tourism and access to underwater cultural heritage through “maritime archaeological routes”. Conservation prescriptions have been adopted for the part of the aquatic area included in the World Heritage site. The opinion of the State Party is expressed on the recommendation to relocate the Nessebar port terminal outside the peninsula. An application has been submitted to the CUA for acquiring a status of “category 2 centre (C2C)” at UNESCO. A UNESCO feasibility study mission on Bulgaria's capacity to implement the forthcoming commitments and a decision is to be taken. A STAB mission has been invited to support the inclusion of the underwater heritage in the draft CMP.

**Under IV.** (in accordance with paragraph 172 of the Guidelines), information is provided on a hotel in the Regulated Land Property (RLP) VIII639-, quarter 54, Nessebar (new part), 1 Lyuben Karavelov Str.

## II. Responses to World Heritage Committee Decision 45 COM 7B.179

The World Heritage Committee,

1. *Having examined Document WHC/23/45.COM/7B.Add.2,*
2. *Recalling Decision 44 COM 7B.154 adopted at its extended 44th session (Fuzhou/online, 2021),*
3. *Takes note of the progress made by the State Party in addressing the Committee's previous decisions and the mission's recommendations, but notes with concern that some issues continue to remain unresolved;*
4. *Notes with concern that the 2023 Reactive Monitoring mission confirmed the findings of the 2018 Reactive Monitoring mission that some of the attributes underlying the Outstanding Universal Value (OUV) of the property have deteriorated;*

In connection with the development of the Conservation and Management Plan for the Ancient City of Nessebar in 2024, work on the preparation of an up-to-date analysis and assessment of the state of conservation of the OUV attributes, including the historic urban environment, is in the process of completion. Part of the documentation is included with this report.

The condition of the single cultural heritage sites on the peninsula according to previous assessments carried out by the National Institute for Immovable Cultural Heritage (NIICH) in the period 2018-2020:

### • *Archaeological heritage*

The survey of the archaeological immovable cultural properties on the territory of the Ancient City of Nessebar by the NIICH has highlighted problems identified in previous monitoring. Conservation and restoration has been carried out on most of the archaeological Immovable Cultural Properties (ICP) in stages over time, but a significant number of them are currently unmaintained due to lack of targeted funding. In recent years, the following archaeological studies have been carried out on the territory of the Ancient City of Nessebar and in its buffer zone:

- The regular archaeological survey of the northwestern section of the fortress wall has been resumed;
- The surveys along Kraybrezhmna street, conservation by backfilling and shaping of the grassed area of the surveyed structures has been completed;
- Rescue archaeological excavations have been carried out and new archaeological sites have been discovered: The ancient basilica under the church of St. John the Baptist (marked contours of the terrain); an ancient dwelling west of St. Spas Church, signed in pavement;
- The status of the site "Necropolis of Messambria-Mesembria", Nessebar municipality, Burgas region, with the classification of a single immovable archaeological cultural property with the category "national importance" and the regimes for the protection of the property and its buffer zone have been granted (Order № Д9Р-16 of 20.08.2024 of the Minister of Culture);

- Underwater archaeological exploration resumed in 2017, continuing in subsequent years. High-resolution photogrammetric surveys and three-dimensional models and photomosaics were made of the archaeological sites and structures uncovered and investigated by the Centre for Underwater Archaeology. The CUA's assessment of the conservation status of the archaeological structures studied in the water area of the World Heritage property is that they are structures and are in a state of equilibrium with their environment.

Most of the archaeological immovable cultural properties on the peninsula have been assessed without major changes in physical condition, but are in need of maintenance and preventive conservation. According to the assessment of the NIICH, 6 (six) of the archaeological sites are in need of medium-term, short-term and urgent interventions. The lack of systematic maintenance and preventive conservation has resulted in: weathering and degradation of materials (stone and brick); erosion of joints in places; and spalling of linings or renderings on restored areas. The recommended actions for the sites in need of urgent intervention coincide with the recommendation of the joint World Heritage Centre/ICOMOS reactive monitoring mission carried out in 2023 to: *“Undertake measures to strengthen and stabilise the Early Byzantine Baths, the archaeological complex next to the West Gate and the “Old Metropolitan Cathedral”, restoration of the floor of the Basilica of the Mother of God Eleusa and the fortification tower next to the South Gate, as well as appropriate measures for the socialisation of the sites”*. For the “Old Metropolia” (St. Sofia), and for “St. Virgin of Eleusa”, design briefs have been prepared for conservation and restoration works.

Some of the immovable cultural property of this group, listed in the National Public Register, are not presented and are not accessible for viewing. There is no documentation and detailed information about them. Also, many of the single archaeological immovable cultural properties have not been demarcated and prescriptions for conservation have not been defined.

Some archaeological sites have seen improvements in their immediate surroundings, with the removal of commercial structures out of harmony with their surroundings, outdoor serving tables, and cleaning of the surrounding area, but at other sites the environment remains neglected.

At sections of the fortress walls and the church "St. Virgin of Eleusa", restored more than 30 years ago, there is a hypothetical reconstruction, in some places hindering the visual perception of the original.

#### • *Medieval churches*

No irreversible processes in the authenticity and integrity of medieval churches have been identified. In the case of the seven preserved ones, as well as in the case of the “Old Metropolia” (St. Sofia), “St. Spas” and the preserved parts of “St. Clement”, two (“St. Paraskeva” and “St. John the Baptist”) were found to be in good physical condition, for three short-term measures were determined, and for “Pantokrator” (St. Nicholas), “St. Stephen” (the New Metropolis), “St. Clement” and “St. Spas” require and have been assigned urgent measures. In recent years, conservation and restoration projects have been implemented in three of the medieval churches: “St. John the Baptist”, “St. Paraskeva”; “St. John Aliturgethos”. Poor drainage was found in some churches (“St. John Aliturgethos”, “St. John the Baptist” and “St. Spas”); poorly applied plaster in

recent restoration interventions “St. John the Baptist”; air-conditioning installations that do not create an optimal temperature-humidity environment for the preservation and conservation of architectural and artistic elements (“St. Stephen”, “St. John the Baptist”), “Pantokrator” (St. Nicholas).

More than 300 single or group graffiti of ships are preserved in four medieval and post-medieval churches in Nessebar - “St. Spas”, “St. Todor”, “St. Stephan” (New Metropolia) and “St. John Aliturgetto”. The graffiti represent an important source of knowledge about shipping and shipbuilding on the Western Black Sea coast and provide new perspectives on the relationship between the Ancient City of Nessebar and its maritime landscape. Along with the decorative features of the churches, the graffiti have been identified by the missions as a significant attribute that gives the OUV to the World Heritage Site.

- *Buildings of vernacular architecture*

For the majority of the 69 Renaissance houses, the 2018 and 2020 NIICH monitoring reports classify the interventions required as long-term and medium-term. Seven (7) sites are in very good condition, two (2) sites have mild damage, and two (2) sites have moderate symptoms of damage requiring short-term intervention. In place of 9 sites new buildings have been constructed with no relation to the demolished houses - immovable cultural properties (most of them with the category “for information” and one with no defined category). One site has severe symptomatology requiring urgent survey and immediate intervention. In conclusion, the NIICH analysis has shown that the best examples of the Nessebar house with the category “national importance” have preserved authenticity and integrity.

In the adopted conservation regimes of the Ancient City of Nessebar from 2015 and 2023, the implementation of which is mandatory, prescriptions are given for the protection of the single immovable cultural property, the buildings without the status of cultural property, as well as the urban environment.

- *Urban environment*

The issues regarding the image of the architectural ensembles and the built urban environment stems to a large extent from the built inharmonious as volumetric-spatial parameters and as architectural image residential buildings, as well as some public buildings. The 2020 assessment of the NIICH is that there is no area within the World Heritage Site for which the highest urban conservation rating can be assigned. It is a requirement of the conservation prescriptions that “where the integrity of the urban fabric in terms of character and pattern of development has been compromised, detailed development plans should be accompanied by working development plans with street skylines to restore it”.

The most common violations are illegal extensions with attic floors and dormers or with one floor, sometimes with a second eave. Since 2010, with the establishment of the Inspectorate for the Protection of Cultural Heritage under the Ministry of Culture, no new illegal constructions have been observed on the peninsula. However, the removal of such structures, identified until then by the National Institute for Cultural Monuments (NICM) / NIICH and the Regional Directorate for

National Building Control (RDNBC) - Burgas, is a difficult process due to long-lasting court cases, as well as the lack of suitable contractors for restoration works. The preference for such contractors to take on the task is more directed towards conservation and restoration of larger and significant public buildings rather than “small” two-storey residential buildings.

As noted, there are no new completed projects or activities threatening the OUV on the site between 2017 and 2024, other than the completion of two sites with previously approved construction documents (buildings at Marina 1 and above the north bank near the churches "St. Virgin of Eleusa"). We would like to recall a quote from the 2017 Advisory Mission Report: *“The World Heritage property The Ancient City of Nessebar retains the key attributes that underpin its Outstanding Universal Value (OUV). There has been significant recent progress to protect the OUV of the property and to reverse negative impacts that took place in the past”*.

The conservation and management plan for the World Heritage Site will reflect the current status of the OUV attributes as of 2024, with appropriate measures for their restoration and conservation.

5. *Also notes that important actions to establish a spatial planning framework and instruments, essential for adequate protection and management of the property, are being implemented and encourages the State Party to finalize the Conservation and Management Plan (CMP), in 18 months;*

The State Party continues its efforts to preserve the World Heritage Site and to restore and conserve the attributes conveying the OUV. In the period 2023-2024, the following main activities have been carried out in this area:

- A Shared Vision for the Ancient City of Nessebar with a horizon of 2025-2044 with a Roadmap to it (2024); *(implementation of item 8a of the Decision 45 COM 7B.179 of the World Heritage Committee)*;
- A Conservation and Management Plan for the Ancient City of Nessebar (2025-2044) is under development and is expected to be ready by the end of March 2025; *(implementation of item 8c of Decision 45 COM 7B.179 of the World Heritage Committee and of all missions)*;
- Under the Territorial Programme of the NIICH, which started at the end of 2022, an updated assessment of the state of preservation of the OUV's attributes of the Ancient City of Nessebar is being prepared in 2024, and which starts the updating of the lists of immovable cultural property within the boundaries and the buffer zone of the World Heritage Site. This report will present some of the documentation prepared by the programme team;
- Increased number of experts in the field of cultural heritage protection in the Ministry of Culture by 27, in the National Institute for Immoveable Cultural Heritage by 17 and in the Centre for Underwater Archaeology by 12; *(implementation of a recommendation of the 2023 Reactive Monitoring Mission)*.
- The Plan for integrated Municipal Development (2024) has been updated. The update has been prepared in relation to the need to synchronize the municipal vision, goals and priorities with important circumstances related to the protection of the World Heritage Site “Ancient City of Nessebar”, which arose after the initial elaboration and adoption of the PIMD, as well as a



requirement of the World Heritage Committee; *(implementation of point 7 of the CSN decision)*;

- A Cultural Heritage Strategy for the Nessebar Municipality 2023-2032 has been adopted and will also be updated following the adoption of the Shared Vision (2025-2044); *(implementation of item 6 of Decision 43 COM 7B.81 and item 4 of Decision 44 COM 7B.154, as well as a recommendation of the 2018 Reactive Monitoring Mission)*.
- In order to involve the local community and various stakeholders in the processes of protection and management of the World Heritage Site, a Public Council for the Protection of Cultural Heritage (PCPCH) was established in 2024 at the Municipality of Nessebar. It is an advisory and coordinating body to the Mayor of Nessebar Municipality for the implementation of the cultural heritage protection policy in accordance with Article 17 (1) (2) of the Cultural Heritage Act (CHA);
- At the May and November 2024 meetings of the PCPCH, the interim and annual reports and the report on the implemented projects and activities contributing to the achievement of the priorities and specific objectives set out in the Cultural Heritage Strategy of the Municipality of Nessebar 2023-2032; the draft Shared Vision for the Development of the Ancient City of Nessebar (2025-2044), as well as other topics related to the preservation of the World Heritage of the city were considered.
- A minor modification of the boundaries of the Ancient City of Nessebar is accepted (Decision: 45 COM 8B.70 of the World Heritage Committee) to include three sections of the sea off Nessebar Peninsula, providing a higher degree of protection for the submerged archaeological remains of the settlement structure and providing the opportunity to explore the underwater archaeological heritage through underwater routes; *(recommendation of the 2015 and 2017 advisory missions, the 2018 reactive monitoring mission and Decision 43 COM 7B.81 and Decision 44 COM 7B.154 of the World Heritage Committee implemented)*;
- Updated World Heritage conservation regimes with specific conservation prescriptions also for the included parts of the water area; *(implemented recommendation of the 2023 reactive monitoring mission and of the World Heritage Committee Decision 45 COM 8B.70)*
- The status of the site “Necropolis of Messambria-Mesembria”, Nessebar municipality, Burgas region, with the classification of a single immovable archaeological cultural property with the category “national importance”, and the boundaries and prescriptions for the protection of the property and its buffer zone have been granted *(implemented recommendation of the reactive monitoring mission of 2023)*;
- The work of the established High-level Inter-Institutional Commission, supported by the Working Group established by Decision of the Council of Ministers No. 161 of 24.03.2022, is intensified; *(the recommendation of the 2023 Reactive Monitoring Mission is implemented)*;
- Steps have been taken to amend the Ordinance of the Council of Ministers on the scope, structure, content and methodology for the preparation of conservation and management plans for single or group immovable cultural property in order to refine and facilitate administrative procedures and to avoid restrictions on the structure and content of conservation and



management plans in view of the different types of immovable cultural property (single and group, archaeological, architectural, artistic, park art, etc.) and the diversity of their characteristics and territorial scope;

- Five projects for the Ancient City of Nessebar have been funded under the programmes of the Ministry of Culture (one contract with the CUA and four with the Ancient Nessebar Museum).

***6. Also encourages the State Party to invite a series of consultative missions of the World Heritage Centre and the Advisory Bodies in order to assist the CMP elaboration;***

In response to this recommendation, two online meetings were held in 2024 between representatives of the World Heritage Centre, ICOMOS, ICCROM and the Secretariat and Advisory Body to the 2001 Convention on Underwater Cultural Heritage and, on the Bulgarian side, representatives of the Ministry of Culture, the Ministry of Foreign Affairs (MFA), the Bulgarian National Commission for UNESCO, the Ministry of Regional Development and Public Works (MRDP), the Ministry of Transport and Communications, the Ministry of Tourism, the Ministry of Environment and Water, National Institute for Immovable Cultural Heritage (NIICH), Center for Underwater Archaeology (CUA); BNC of ICOMOS, National Archaeological Institute with Museum at the Bulgarian Academy of Sciences (NAIM – BAS), Burgas Regional Administration, Nessebar Municipality, Directorate for National Construction Control (DNCC).

The meetings were held as follows:

- on 5 March 2024 - online expert meeting on the future of the Ancient City of Nessebar;
- on 28 June 2024 – online consultation meeting for initial comments on the prepared “Vision” and “Road Map” of the Ancient City of Nessebar, as first steps towards the development of the Conservation and Management Plan for the World Heritage Site “Ancient City of Nessebar”.

A feasibility study mission is expected in connection with the initiative to establish a “Category 2 Center (C2C)” in Bulgaria for the protection of UNESCO's underwater and World Heritage regarding the capacity of the Bulgarian side to implement the upcoming commitments and make a decision, as well as a STAB advisory mission to the 2001 Convention for the inclusion of the underwater heritage in the Conservation and Management plan of the “Ancient City of Nessebar”.

***7. Further notes with great concern that the Integrated Development Plan for Nessebar Municipality 2021-2027 adopted in August 2021, proposes a vision for the future of Nessebar revolving around the tourism mono-economy, with actions that may locally improve spatial qualities of the property but have greater potential to exacerbate current threats and further erode the attributes of OUV, and urges the State Party to revise the Plan in the light of an OUV-based vision and strategy for the future of Nessebar that does not focus only on tourism;***

In order to fulfil the requirement of this item of the Decision, the Municipality of Nessebar has commissioned the preparation of an Interim Assessment of the implementation of the **PIDM** for

the period 2021-2023. In accordance with the results obtained, the ICOMOS Report of the Reactive Mission (2023) and on the basis of Article 22 (1) of the Regulations for the Implementation of the Regional Development Act and the “Methodological Guidelines for the Development and Implementation of Integrated Development Plans of a Municipality for the Period 2021-2027” of the MRDPW, an update of the Plan was carried out and adopted by Decision No. 259 of Minutes No. 10/24.09.2024 at a meeting of the Municipal Council of Nessebar.

The preservation of the living city, the integrity and the authenticity of the World cultural heritage of the Ancient City of Nessebar are placed “*at the heart of the updated Vision*”:

*“Nessebar 2027 - sustainable development and prosperity inspired by local potentials, at the heart of which is the ancient Nessebar - a unique world cultural heritage, with preserved vitality, integrity and authenticity”.*

The updated document defines entirely new strategic objectives aimed at social, territorial and economic development, as well as the preservation of the cultural heritage of the municipality and the Outstanding Universal Value of the Ancient City. Their achievement is in line with the objectives and priorities set in the important documents for the cultural heritage of the municipality, the Cultural Heritage Strategy of Nrssebsr Municipality (2023-2032) and the Shared Vision of the Ancient City of Nessebar (2025-2044) (PIDM, 115).

#### **Strategic objectives:**

- Objective 1. “Economic growth based on the blue economy”
- Objective 2: “Sustainable territorial development”
- Objective 3. “Social Well-being”
- Objective 4: “Distinguished World Cultural Heritage - Emblem of Nessebar Municipality”

Eight priorities have been identified under the Strategic Objectives, aimed at: developing sustainable and year-round tourism and a more diversified economy with a focus on fisheries, agriculture and manufacturing (Priority 1.1. and 1.2.); conservation and rational use of natural resources and building a quality living environment (Priority 2.1. and 2.2.); provision of accessible and quality public services and creation of more sustainable employment opportunities (Priority 3.1. and 3.2.); preservation, socialization and valorization of the diverse cultural heritage in the municipality of Nessebar and of the World Heritage Site “Ancient City of Nessebar” (Priority 4.1. and 4.2.).

The priorities are supported by specific measures and a set of activities that will be the subject of projects in the coming years, with an indicative budget, an indication of the source of funding, a timeframe for implementation and a responsible institution.

**The “Cultural Heritage Strategy of Nessebar Municipality (2023-2032)”**, prepared in implementation of the Decisions 43 COM 7B.81 and Decision 44 COM 7B.154 of the World Heritage Committee on the award in 2022 by the Municipality of Nessebar, focuses on the preservation of the OUV of the “Ancient City of Nessebar” and considers extensively the cultural heritage in the wider context of the municipal territory.

The Strategy formulates and establishes an overall integrated **VISION for 2032:**

- Nessebar - a municipality with preserved unique model of synergy between different types of cultural heritage (tangible - terrestrial, underwater, movable and intangible).
- Cultural properties are used as a driving force for a sustainable, compatible and equitable development of the Municipality of Nessebar, the Ancient City and its outstanding universal value (OUV).
- A living historic city is a better place to live, work, learn and visit. The quality of life of the population has been improved, rich opportunities for personal and professional development have been created, the link with the cultural heritage has been strengthened.

A common strategic objective has been defined: *to achieve a sustainable, compatible and equitable development of the Municipality of Nessebar, based on the cultural heritage and the Outstanding Universal Value (OUV) of the “Ancient City of Nessebar”*. Three priorities have been identified, designed to regulate policy at the local level and extremely important in a global perspective. All three priorities have been given equal weight, each supported by specific objectives to achieve the identified outcomes:

| PRIORITY 1.   | PRIORITY 2.   | PRIORITY 3.  |
|---|---|--|
| P.1.  | P.2.  | P.3.   |
| Sustainable Development of Cultural Heritage  | Compatible Development of Cultural Heritage   | Equitable Development of Cultural Heritage   |
| <b>SpG.1.1.</b> Social Inclusion<br><b>SpG.1.2.</b> Balanced Economic Development<br><b>SpG.1.3.</b> Resistance to Climatic and Environmental Impacts | <b>SpG.2.1.</b> Protecting the <b>living city</b> , <b>improving the quality of life of the</b> local community<br><b>SpG.2.2.</b> <b>Conservation</b> of the Nessebar Municipality cultural heritage and the OUV of the “Ancient city of Nessebar“<br><b>SpG.2.3.</b> Presentation, interpretation, valorisation and promotion of CH | <b>SpG.3.1.</b> Establishing <b>good participatory governance</b><br><b>SpG.3.2.</b> Foster <b>an integrated approach to CH</b><br><b>SpG.3.3.</b> <b>Inclusion and access to CH</b> |

The Strategy was approved at the High Level Inter-Ministerial Committee meeting on 05.06.2023. The ICOMOS Technical Review found that its preparation „*was a positive step towards improving the positioning of cultural heritage in the development of Nessebar*“, but recommendations were made for its revision. The ICOMOS opinion has been taken into account by the State Party to the Convention and by the municipal authorities. By Decision No. 973/12.09.2023, the Municipal Council of Nessebar adopted the Strategy in the part concerning the territory of the municipality (excluding the Antient city), assigning the mayor of the municipality to organize an independent section “Antient acity of Nessebar” in accordance with the recommendations of ICOMOS. The revision of the Strategy and the preparation of an additional section on the “Ancient City of Nessebar” will proceed after the adoption of the Shared Vision for the future of the Ancient City of Nessebar with a Roadmap by the WHC, the UNESCO advisory bodies and the State, given that the Vision should serve as a framework for all current and future decision-making, preparation of plans and projects related to the development of the site, including operational and strategic documents.

#### **8. *Strongly reiterates its urgent requests to the State Party to:***

- a) *Devise a vision for the future of the “Ancient City of Nessebar” based on its OUV, which pursues sustainable, compatible and equitable development of the property within the larger municipal territory and is not solely focused on tourism,***

In 2024, a “Shared Vision for the Ancient City of Nessebar - Preserving the Outstanding Universal Value (2025-2044)” and a Roadmap to it were prepared by the High Level Expert Working Group of the Inter-Ministerial Commission. The document is based on the Outstanding Universal Value (OUV) principles and will serve as the basis for the development of the future Conservation and Management Plan (CMP) for the World Heritage Site and as a framework for all current and future decision-making, as well as for the preparation of other plans and projects related to the conservation, enhancement and development of the World Heritage Site, including operational and strategic documents.

The Vision traces the current status of the OUV attributes of the World Heritage Site, the Conservation Area and in the wider territorial scope. It comments on the state of integrity and authenticity and analyses the conservation and management system. The strategic document has a 20-year horizon, and the Vision for the future of the Ancient City by 2044 presents a comprehensive picture of the future, contemporary urban development and the achievement of integrity between the cultural, social and economic dimensions, in line with the perception of civil society and all actors involved in the conservation and planning processes.

#### **Vision to 2044:**

- Sustainable development is a key factor in decision-making. Mechanisms for managing the world's cultural property are strengthened. Capacity for research, conservation, presentation and development of cultural heritage has been built. The role of local populations has been strengthened and effective partnerships between actors in conservation processes have been achieved.
- The attributes that carry the OUV, the impact of the historic urban environment and the coastal cultural landscape have been restored to the maximum extent possible.
- Underwater cultural heritage within the boundaries of World Heritage Site has been studied, adequately protected and conserved, interpreted and made accessible to the public. Capacity has been built for its conservation, management and monitoring.
- The balance desired by the local population and the governing bodies between the preservation of cultural heritage and the processes of urban development has been achieved. The cultural heritage of the Ancient City of Nessebar and of the Municipality of Nessebar is integrated into the plans and projects for sustainable territorial, cultural, economic and social development, including at national level.
- Traditional functions, practices and crafts associated with the historical development of the world cultural property have been revived. Cultural heritage is realized as a resource for year-round use, the development of cultural and creative industries and of sustainable and responsible tourism, and is promoted at local, national and international levels.

- A living historic city is a better place to live, work, learn and visit. The quality of life of the local population has been improved, and rich opportunities for personal and professional development have been created.

A global priority, priority areas, strategic and specific objectives, measures and activities to achieve them are defined.

- **Global Priority:** Sustainable, compatible and equitable development of the cultural heritage of the Ancient City of Nessebar and preservation of its OUV.
- **Priority Area 1:** Strengthening the mechanisms for the protection and management of the World Heritage Site of the Ancient City of Nessebar. Restoration to the maximum extent of the attributes bearing its Outstanding Universal Value.
- **Priority Area 2:** Restoring the overall impact of the traditional “historic urban environment - coastal cultural landscape” relationship.
- **Priority Area 3:** Research, conservation and interpretation of underwater cultural heritage. Capacity building. (in line with the recommendation of the 2017 advisory mission and decision 45 COM 8B.70 of the World Heritage Committee);
- **Priority Area 4:** Balance between cultural heritage preservation and urban development processes. Integration of the cultural heritage of the Ancient City of Nessebar and of the Municipality of Nessebar in the plans and projects for sustainable territorial, cultural, economic and social development;
- **Priority Area 5:** Cultural Heritage - a resource for the development of year-round sustainable responsible cultural tourism and cultural and creative industries. Revival of traditional functions, practices and crafts. Promotion.
- **Priority Area 6:** The Living Historic City - a better place to live, work, learn and visit. Sustainable development of urban functional systems

The Roadmap presents the action plan for the implementation of the strategic framework set out in the Shared Vision 2044, which reflects the deficits analysed, the decisions of the World Heritage Committee, the recommendations of the 2017 UNESCO, ICOMOS and STAB Advisory Mission and the 2018 and 2023 Reactive Missions, as well as the findings, analyses and recommended actions from the monitoring missions conducted by the NIICH in 2018 and 2020. The UNESCO Conventions of 1972, 2001, 2003 and 2005, as well as the HUL Recommendation on and the national legal, regulatory and strategic framework, have also been taken into account. ICOMOS' opinion on the Shared Vision for the Ancient City of Nessebar was received by the Ministry of Culture on 6 November. The Vision is to be revised taking into account the comments and recommendations of ICOMOS, for which the time until the end of November will not be sufficient.

The Shared Vision has been discussed at the following Inter-Ministerial Committee meetings:

- on 06.02.2024, agenda item 1 - discussion on the development of the CMP and the Vision as part of it;
- 20.05.2024, agenda item 5 - discussion of the development of a vision and roadmap;



- on 14.06.2024 a draft of the Vision for the development of the Ancient City of Nessebar and a Road Map were presented.

Two online meetings were also held 05 March and 28 June to discuss the Vision with the WHC, ICOMOS, ICCROM and the Secretariat and Advisory Body to the 2001 Convention on Underwater Cultural Heritage. As a result of the opinions and comments, the Shared Vision for the Ancient City of Nessebar was revised and sent by letter No. 04-01-399/10.09.2024 to the Ministry of Foreign Affairs for forwarding to the World Heritage Centre.

*b) Develop, approve and implement the CMP for the property, with the ultimate goal of ensuring the safeguarding and recovery of the attributes of OUV, while harnessing the participation of the local community and civil society and building on the principles of the UNESCO Recommendation on the Historic Urban Landscape (2011) and the ICOMOS International Charter for Cultural Heritage Tourism (2022); establish mechanisms to guarantee that the CMP objectives, strategies and actions are taken into due account in all other spatial or development plans under preparation or already adopted,*

To the report of the State Party from 2022 on the State of Conservation of the Ancient City of Nessebar, was attached a brief for the preparation of a draft CMP for the property. In connection with the adoption by the World Heritage Committee Decision 45 COM 8B.70 of a minor modification of the boundaries of the World Heritage Site to include part of the water area of the peninsula, the ToR for the CMP was amended accordingly. The elaboration of the CMP was preceded by the preparation of the “Shared Vision for the Ancient City of Nessebar (2025-2044)” and its Roadmap. The priority areas, strategic and specific objectives, measures and activities for their achievement identified in the Vision and to be included in the CMP are fully in line with the decisions of the World Heritage Committee and the recommendations of the advisory and reactive monitoring missions. At the end of November, work on the assessment of the condition of the property as well as the key attributes of the OUV of the Ancient City of Nessebar (archaeological sites, buildings of religious architecture, buildings of vernacular architecture, historic urban environment) was completed.. The Centre for Underwater Archaeology (CUA) conducts annual monitoring of archaeological structures discovered and investigated underwater.

The drafting of the CMP is currently underway and is expected to be completed by the end of March 2025. The methodology for the development of the plan is based on: the compilation of detailed comprehensive information on all the attributes of the Outstanding Universal Value, authenticity and integrity of the World Heritage property and on the tangible and intangible properties, cultural and natural, in the wider context; the identification of threats to the cultural heritage; the application of an integrated approach in the planning and management system (Guidelines for the implementation of the Convention, para. 112) on the Protection of the Diversity of Cultural Property), in which the preservation of cultural heritage is taken into account at all stages of planning (paragraph 8, letter “b” of Decision 45 COM 7B.179 of the 2023 World Heritage Committee); the objectives of preservation and sustainable development; the unity of the management system as a coordinated collective process in which participants are united by common goals. Of particular relevance to the Ancient City of Nessebar is the application of the



method to the historic urban landscape, which brings together all the characteristics of the historic urban environment and its context.

*c) Approve and enforce the General Development Master Plan for Nessebar Municipality and consequently the Detailed Development Plan for the Ancient City of Nessebar, with all necessary support from the national authorities and incorporating all relevant Committee's and missions' recommendations,*

At its meeting on 12.02.2024, the Municipal Council of Nessebar Municipality decided to prepare a new General Development Plan of the Municipality (GDP) and accepted a new Terms of Reference for its preparation. (*Annex 1*) The decision was motivated by the impossibility to continue and finalize the procedure for approval of the previous draft of the GDMP due to the termination of the environmental assessment procedure by letter of the Minister of Environment and Water, as well as because the Terms of Reference for the GDMP of the Municipality of Nessebar approved in 2007 do not currently adequately reflect all changes in the factual situation on the territory of the municipality and in the regulatory framework.

With the new Terms of Reference for the elaboration of the General Development Plan of Nessebar Municipality it is envisaged that the project will be elaborated with a planning horizon of 2040. Based on the Terms of Reference and the current regulatory framework, the Municipality's GSP is intended to reflect:

- The requirements regulated by the Spatial Planning Act (SPA), including the structure of the areas for nature conservation; for cultural and historical protection; disturbed areas for restoration; the general spatial planning regime of each of the areas with the relevant rules and regulations for spatial planning and management.
- The requirements regulated by the, Black Sea Coast Spatial Planning Act (BSCSPA) including the identification of measures for the protection of the environment, biodiversity, natural resources and cultural values; the areas for active implementation of landscaping measures and aesthetic design; the measures necessary for coastal protection, conservation, restoration and improvement of the aesthetic qualities of the areas; the measures for the protection and restoration of the character of the landscape and of cultural values; the areas to be developed as coastal parks and gardens; the specific requirements, rules and regulations for the development of the territory and the water area, etc.

The cultural heritage of Nessebar Municipality is discussed in a separate section of the Terms of Reference, which reflects the envisaged guidelines for its protection and development in the preparation of the GDMP.

In a letter dated 19.11.2024 of the NIICH the Minister of Culture is proposed to agree the submitted Terms of Reference for the design of the GDMP of Nessebar Municipality, with relevant recommendations to the development of the plan itself.

By letter No. CT-84-771/20.11.2024. The Ministry of Culture (*to Annex I*) has agreed the Terms of Reference for the design of the GSP of Nessebar Municipality with requirements to be reflected in the development of the plan itself, including the recommendation of the 2018 Reactive Monitoring Mission: *“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.”*

***d) Guarantee that the protection regimes for the property are known and respected by all stakeholders;***

Prior to the adoption in 2015 of the conservation regimes for the Ancient City of Nessebar, inappropriate buildings were found, especially in the conservation area of the mainland property, as well as in some parts along the coast of the peninsula. The protection regimes of the property have been updated by Order of the Minister of Culture No ПД9Р-2 of 23.11.2023 in connection with the inclusion of part of the water area within the boundaries of the World Heritage Site.

The implementation of the conservation regimes of the Ancient City of Nessebar is mandatory and is already taken into account at the project level. In the course of the coordination procedure under the Cultural Heritage Act (CHA), the National Institute for Immovable Cultural Heritage (NIICH) and the Ministry of Culture assess the permissibility of the proposed project interventions on the territory of the property and in its buffer zone in terms of their compliance with the conservation regimes.

With the establishment in 2009 of the Inspectorate for the Protection of Cultural Heritage at the Ministry of Culture, regional inspectors conduct periodic inspections on the territory of the Ancient City of Nessebar for compliance with the requirements of the Cultural Heritage Act and the acts issued on the basis of it, related to the territorial protection of the World Heritage Site. For the period 2023 - 2024, nine inspections were carried out and one acceptance commission was held.

***• exercising effective control during the restoration/reconstruction works at all stages of implementation after the approval of the plans, including the completion stage.***

In accordance with the provisions of the CHA (Art. 169, para. 5), the construction supervision over the implementation of investment projects for conservation and restoration of immovable cultural property is carried out with the participation of specialists registered in the register of persons entitled to carry out conservation and restoration activities. Control over the legality of construction is also exercised by the Regional Directorate for National Construction Control Burgas, as well as by the Department of Construction Control in the Municipality of Nessebar. The commissioning of constructions related to interventions in single immovable cultural properties (ICPs) and their boundaries is carried out after a positive opinion of the Ministry of Culture, and the execution documentation is subject to coordination under the terms and conditions of the CHA. Where the execution concerns façade conservation and restoration and repairs of roofs of ICPs, conservation and restoration of artistic elements and frescoes and

conservation of archaeological ICPs, the acceptance of the execution shall be carried out by a commission appointed by the Minister of Culture, which shall include representatives of the NIICH, the Inspectorate for Protection of Cultural Heritage and the municipal administration.

9. *Further requests the State Party to implement the recommendations of the 2023 Reactive Monitoring mission as well as previous recommendations of the 2018 Reactive Monitoring mission;*

#### IMPLEMENTATION OF THE RECOMMENDATIONS OF THE 2017 ADVISORY MISSION AND THE 2018 AND 2023 REACTIVE MONITORING MISSIONS:

- *mapping, permanent monitoring and survey by conservation specialists of the state of the valuable elements of the heritage that contribute to the OUV of the property - urban fabric, monuments and archaeological sites. Complete the ongoing inventory of the heritage of the property.*
- *ongoing monitoring by conservation specialists of the conditions of the historic buildings needs to take place to ensure that the vernacular and religious buildings are maintained over time. Particular attention should also be paid to the decorative features of the churches so that vulnerable elements, such as the ship graffiti, are conserved as significant attributes that convey OUV.*

In recent years, experts from the National Institute for Immovable Cultural Heritage (NIICH), as well as external experts, have been conducting monitoring to establish the conservation status of the immovable cultural property and the urban structure of the Ancient City of Nessebar. The results are reflected in reports with analyses, assessments and recommended measures for the main attributes of the Outstanding Universal Value (OUV) of the site. The computer processing of the geodetic measurements has been carried out by the NIICH and the street silhouette plans have been completed in digital and graphic form at a scale of 1:200. Geodetic and photogrammetric surveying of the medieval churches was carried out, as well as aerial photography of the entire territory of the Ancient City of Nessebar. After computer processing of the aerial photographs, an orthophotomap was made, geodesically attached to the cadastral map of the Ancient City of Nessebar. All the immovable cultural properties on the territory of the peninsula, as well as those discovered under water, were georeferenced and mapped in the “Atlas of immovable cultural properties”. In 2023, the largest project in Bulgaria for the Digitization of the Ancient City of Nessebar was realized by the teams of NIICH and the company Vekom Geo Bulgaria, creating a 3D copy of the Ancient City. The digital double replicates the physical reality of the Ancient City of Nessebar. The digitized objects include 120 single immovable cultural properties - among them fortress walls and towers, necropolises, early Byzantine thermae, early Byzantine and Byzantine churches, examples of Renaissance architecture. The three-dimensional copy made is also georeferenced.

In addition to the research of NIICH, systematic archaeological field work has been conducted since 2013, initially under the guidance of Prof. Dr. Anelia Bozhkova, and since 2020 by the Department of Archaeology of the NBU. The aim is the localization of all archaeological sites in Nessebar municipality. Part of the research is funded by the National Research Fund and the Ministry of Culture, as well as the publication in 2023 of one of the most complete monographs on the region – “Archaeology of the Landscape. Settlement patterns in the vicinity of Messambria Pontica” by Zhivko Uzunov (ISBN 978-619-233). Thanks to the systematic surveys, more than 50 sites have been recorded to date, enabling the reconstruction of the context and the surrounding environment in a wider geographical area. These sites have been georeferenced and made available to the NIICH.

At the end of 2022, the “Territorial Programme under Article 57 (1) of the Cultural Heritage Act (CHA) and Article 3 (1) of Ordinance No. 3 on the Procedure for Identification, Declaration, Granting of Status and Determination of the Category of Immovable Cultural Properties, Access and the Circumstances Subject to Entry in the National Public Register of Immovable Cultural Properties of the Ministry of Culture” was launched, including the municipality of Nessebar. Participants in the Programme are conservation experts from NIICH as well as external specialists. The aim of the Programme is to search, study and reflect the current state of the immovable cultural property (ICP). The territorial programme of the NIICH for the territory of the Ancient City of Nessebar continues as the GIS georeferenced database was completed in 2023.

In 2024, as part of the territorial programme for the Ancient City of Nessebar, the preparation of a comprehensive georeferenced database (GIS) was commissioned to collect information from the current cadastre, the ICP Register, the Archaeological Map of Bulgaria (AMB), current orthophoto plans, satellite and drone images, on-site inspections. The current state of the OUV attributes is being surveyed, and this also starts the procedure of updating the status of the single ICPs.

The work on data entry, data analysis and preparation of specialized analytical schemes has been for the most part completed. Analyzes are carried out for the identified key groups of OUV attributes – archaeological heritage, (medieval) churches, traditional residential (vernacular) architecture and others (category including 4 SICPs status sites).location schemes, boundaries, a support plan with an attached table with information on all ICPs within the World Heritage Site and its buffer zone, advertisements and uncharacteristic elements on the facades, assessment of the condition of the attributes, assessment of the authenticity of the OUV attributes, scheme for pavements within the World Heritage property boundaries, and for each scheme the parametric data have been extracted and systematized in the form of diagrams, summary values and comments on specifics. Not all currently selected criteria for the analysis and assessment of the key groups of OUV` attributes–are applicable to the archaeological heritage, therefore separate schemes and analyzes have been developed for it, applying a classification according to a recommended class related to the assessment of necessary measures developed by 2024 Mr. and as a benchmark 2024. compared to 2018.

For the purpose of inputting current attribute condition assessments, a standardized GIS attribute table has been created that will serve as the basis for a future parametric form for inputting new data from regular monitoring of the Ancient City. In this way, the GIS database will be kept continuously up-to-date and serve as an effective management tool for the World Heritage Site.

The data and schemes related to the assessment of the urban environment, ownership, functions, condominiums, periodization and development of the urban structure remain to be completed and shaped. In connection with the urban assessment, individual street silhouettes are in the process of being prepared at selected locations, based on the current 3D survey of the Ancient City of Nessebar.

### Location of the Ancient City of Nessebar, Bulgaria



*Fig. 1: Location of the Ancient City of Nessebar, Bulgaria; Source NIICH (2024)*



## "Ancient City of Nessebar" – Boundaries of the WH property and the buffer zone

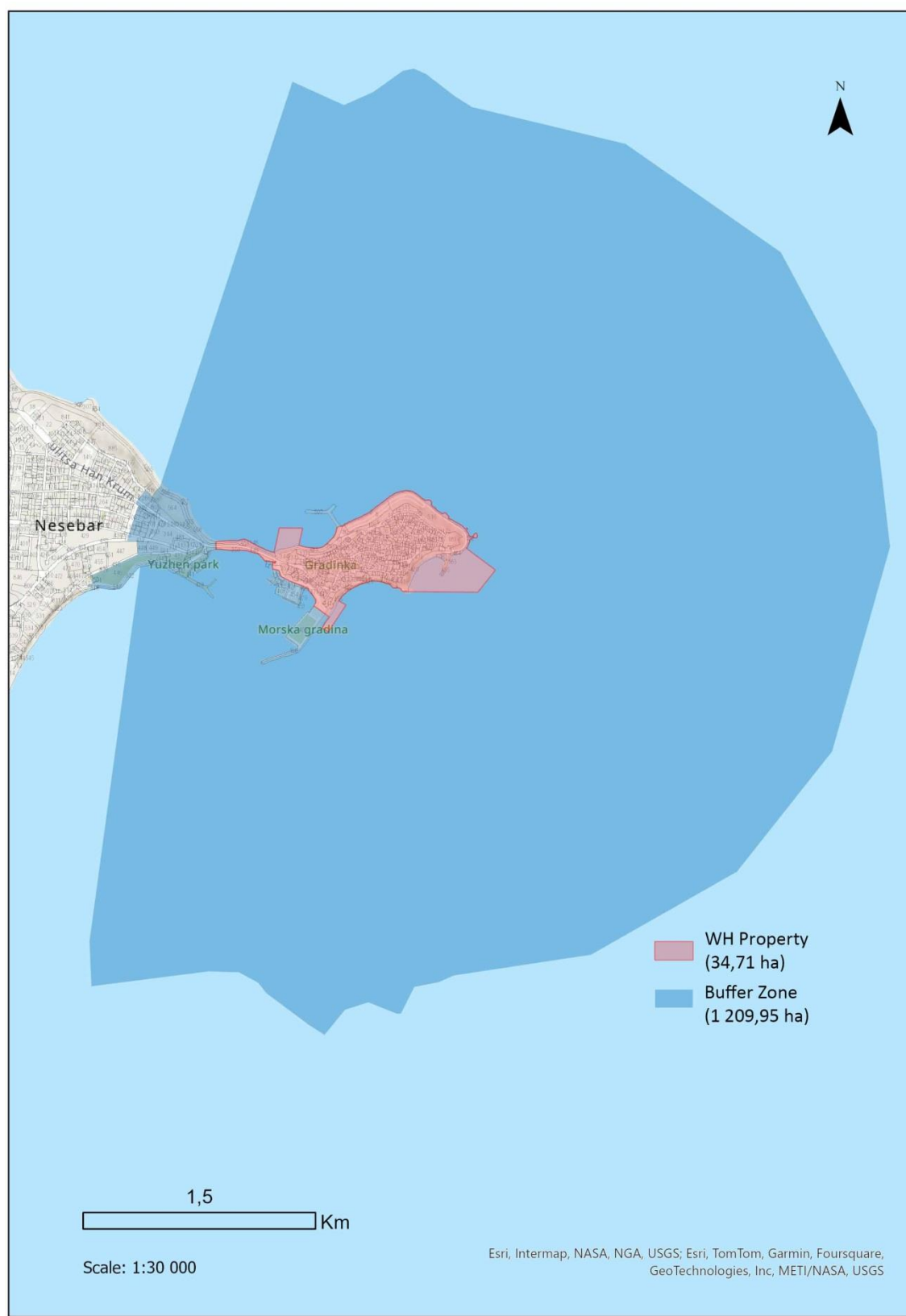


Fig.2: "Ancient City of Nessebar" – Boundaries of the WH property and the buffer zone; Source NIICH (2024)



## Designated sites within the WHP “Ancient City of Nessebar”

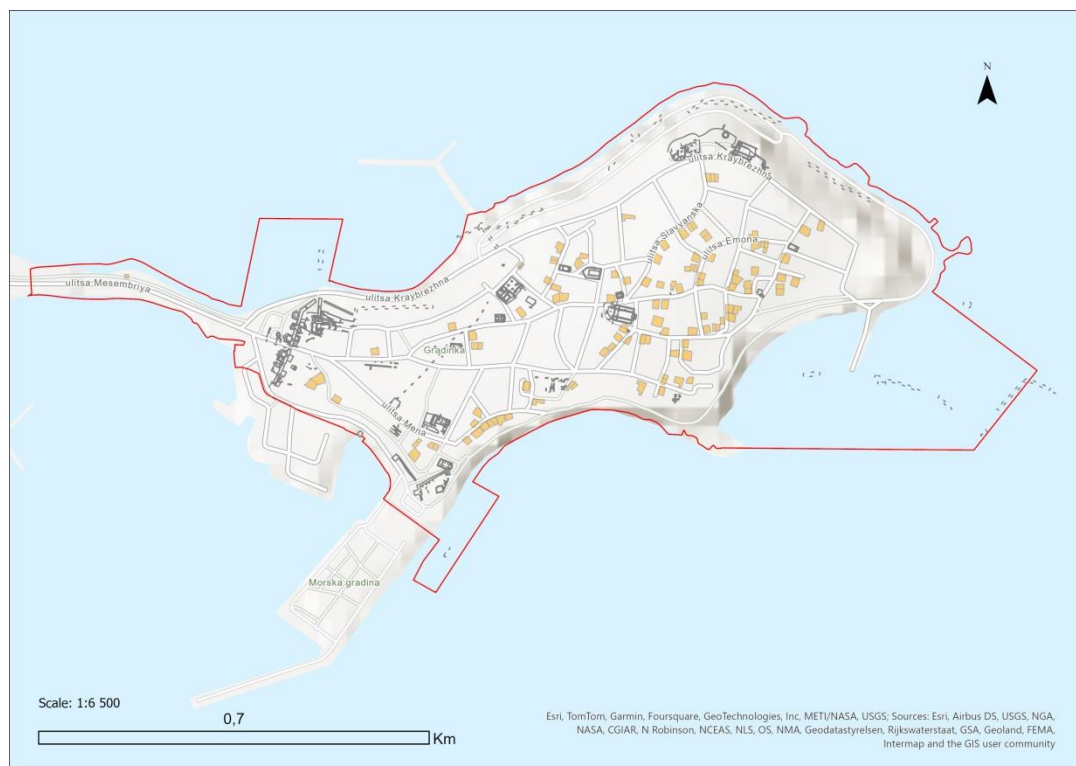


Fig.3: Designated sites within the WHP “Ancient City of Nessebar”; Source NIICH (2024)

## Archaeological Heritage within the WHP “Ancient City of Nessebar” and its Buffer Zone

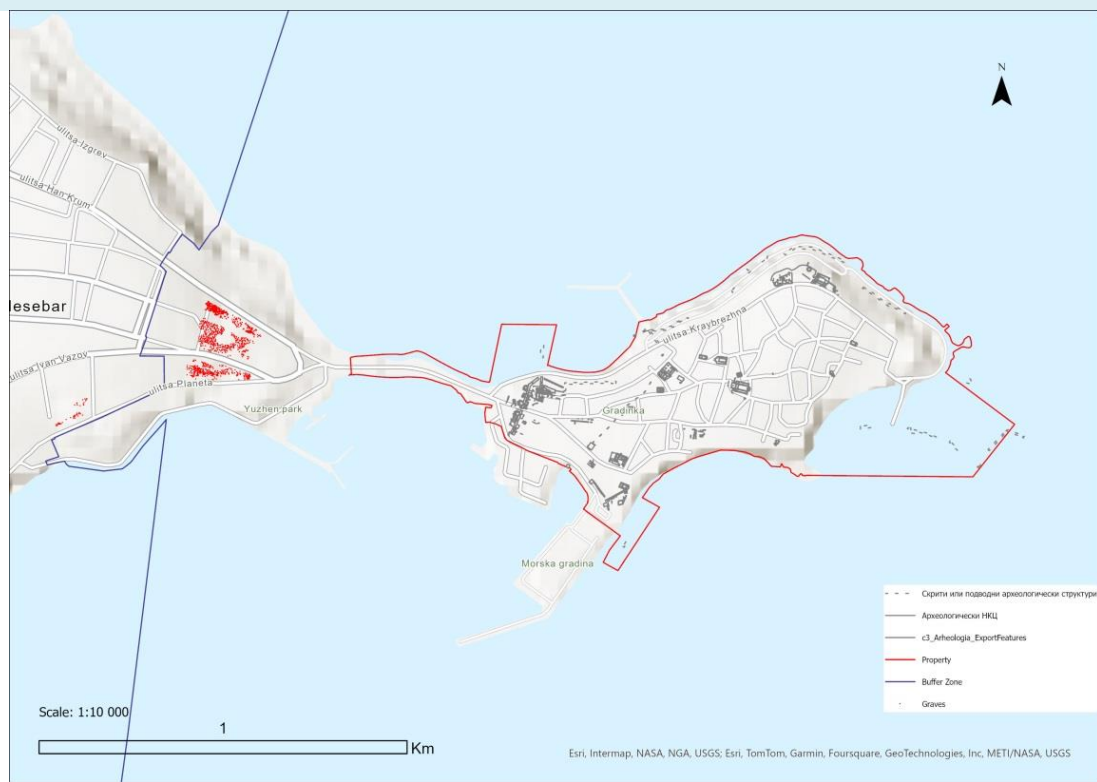


Fig.3: Archaeological Heritage within the WHP “Ancient City of Nessebar” and its Buffer Zone; Source NIICH (2024)

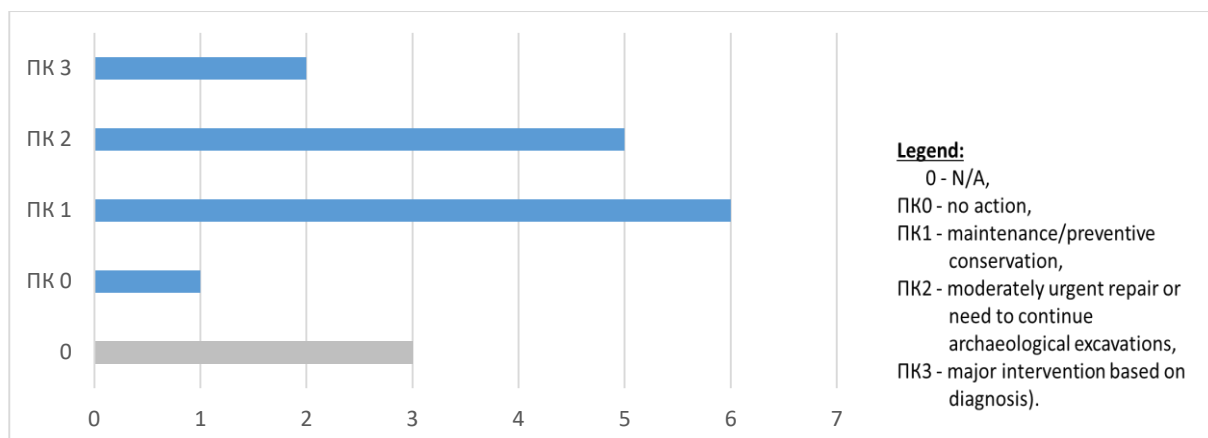


Fig..4: Count against 'recommended class' 2024 - (0- N/A, PK0 - no action, PK1 - maintenance/preventive conservation, PK2 - moderately urgent repair or need to continue archaeological excavations, PK3 - major intervention based on diagnosis). Source NIICH (2024)

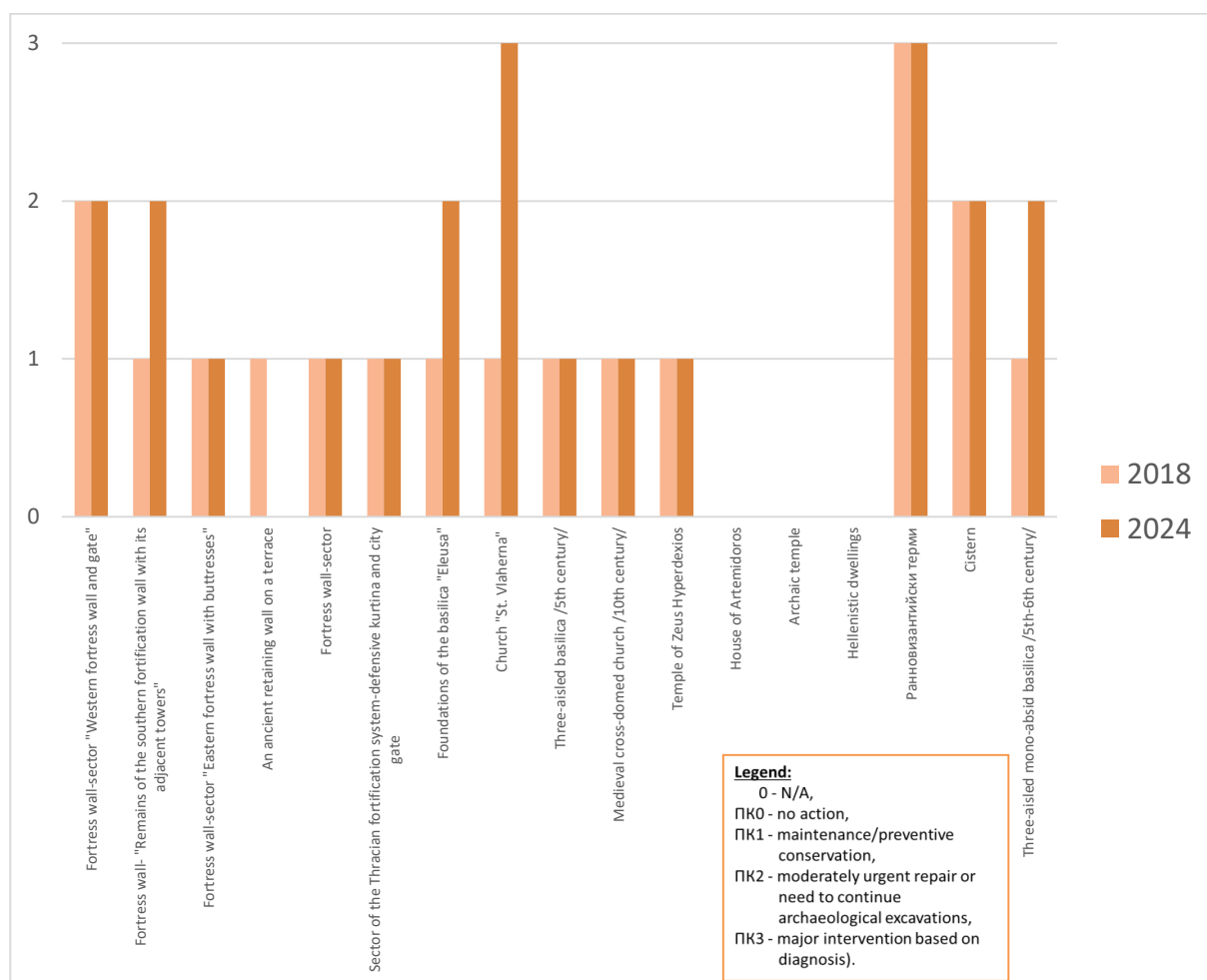
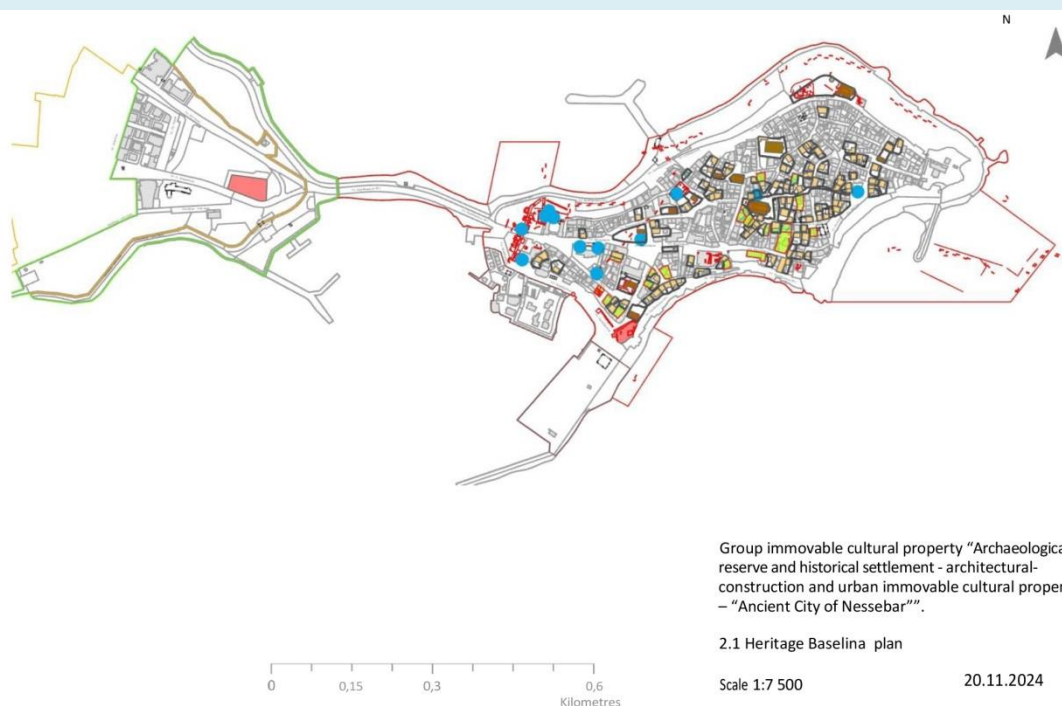
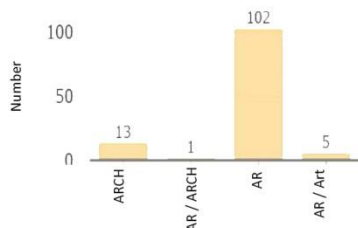


Fig.5: General classification recommended class 2018 vs 2024 - (0- N/A, PK0 - no action, PK1 - maintenance/preventive conservation, PK2 - moderately urgent repair or need to continue archaeological excavations, PK3 - major intervention based on diagnosis). Source NIICH (2024)

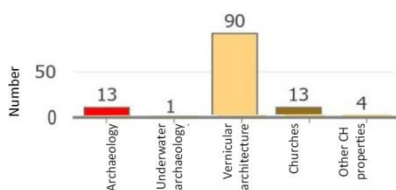
## „Ancient city of Nessebar“ - Heritage Baseline Plan



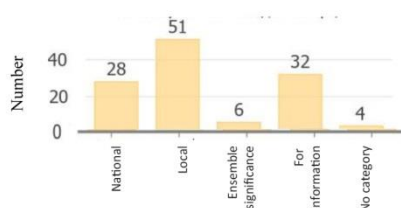
ICP type, scientific field, Art. 47 of the CHA /121 pcs./



Key attributes of the OUV /121 pcs./



Category of ICP /121 pcs./



Total 121 ICPs with defined scientific field: APX - Archaeology; AC – Architectural – Construction; X - Art.

Total 121 CH properties:  
ARCH - Archaeological CH properties  
ARCH / AR - Archaeological/Architectural CH Properties  
AR - Architectural CH Properties  
AR / ART - Architectural / Artistic CH Properties

- Spatial structure for a total of 121 ICPs:

118 are Single;  
2 ICPs (No. 103, No. 4) are without information;  
1 ICP No. 121 is a group.

- Section III: On the territory of the Reserve 22 sites have been identified – "Buildings without individual qualities for architectural monuments, but participating with their volume and scale in the spatial construction of the Reserve" (letter No. 4460/ 29.07.1987 of NICM).

- The protection of 8 is terminated.  
- Identification: issues were found for 38 sites

Sources of information:  
Extract from the current cadastral map of the city of Nessebar;  
[www.kajs.cadastre.bg](http://www.kajs.cadastre.bg);  
[www.google.com/maps/](http://www.google.com/maps/);  
List of immovable cultural property /ICP/ on the territory of the CITY OF NESSEBAR, Nessebar Municipality, Burgas Region, according to the Cultural Heritage Act /CHA/

### Legend

- Boundary of the "Ancient City of Nessebar" - WH Property
- Buffer zone boundary - mainland - zone A
- Buffer zone boundary - peninsula - zone B
- Buffer zone boundary - in the water area - zone B1 - 220m from the shoreline
- Buffer zone boundary - in the water area - zone B2 - to the two-kilometre water area
- Boundary of the archaeological cultural property - Necropolis of Mesaibria / Mesembria
- Territorial scope SICPs
- Archaeology No.
- Hidden or underwater archaeological structures
- Archaeological sites
- Vernacular Architecture
- Churches
- Elements included in Section III, 17 pcs.
- Delisted included in Section III, 6 pcs.
- Delisted 2 pcs.
- Building
- Elements of the current cadastral map - non-conforming to the current state (replaced; destroyed; altered)

Group immovable cultural property "Archaeological reserve and historical settlement - architectural-construction and urban immovable cultural property – "Ancient City of Nessebar"".

Fig. 3: Heritage Baseline Plan for WHP „Ancient city of Nessebar and its Buffer Zone“; Source NIICH (2024)

## STATE OF CONSERVATION ASSESSEMENT



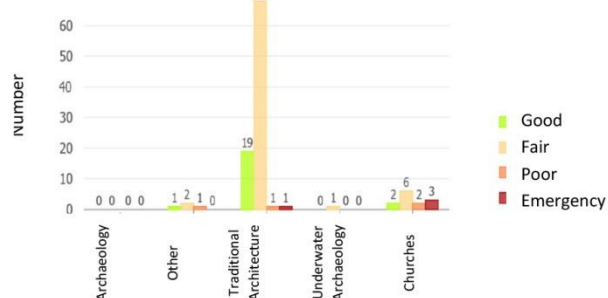
Group immovable cultural property  
"Archaeological reserve and historical settlement -  
architectural-construction and urban immovable  
cultural property – "Ancient City of Nessebar".

14.1.1 State of Conservation

Scale 1:7 500

21.11.2024

Technical condition of the sites /121 pcs./



Two sites are outside the scope of the current scheme: 1 due to unclear identification and 1 is backfilled archaeological site

Sources of information:

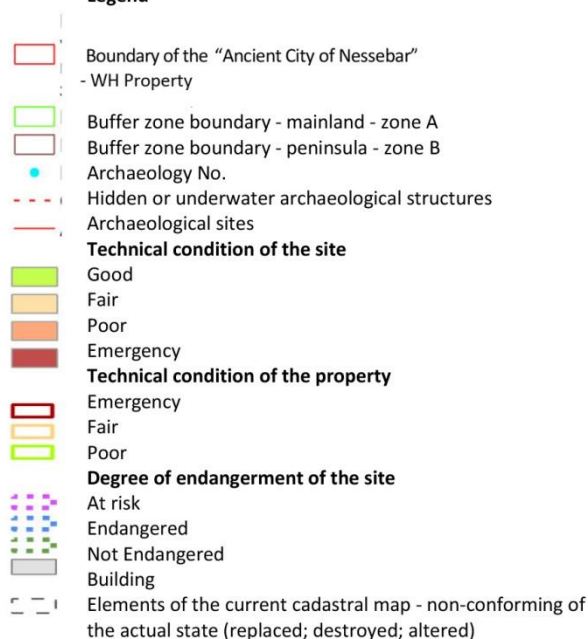
Extracted from the current cadastral map of the city of Nessebar;

[www.kais.cadastre.bg](http://www.kais.cadastre.bg);

[www.google.com/maps/](http://www.google.com/maps/);

List of the immovable cultural property on the territory of the CITY OF Nessebar, Nessebar Municipality, Burgas Region, according to the Cultural Heritage Act /CHA/

### Legend



Group immovable cultural property "Archaeological reserve and historical settlement - architectural-construction and urban immovable cultural property – "Ancient City of Nessebar".

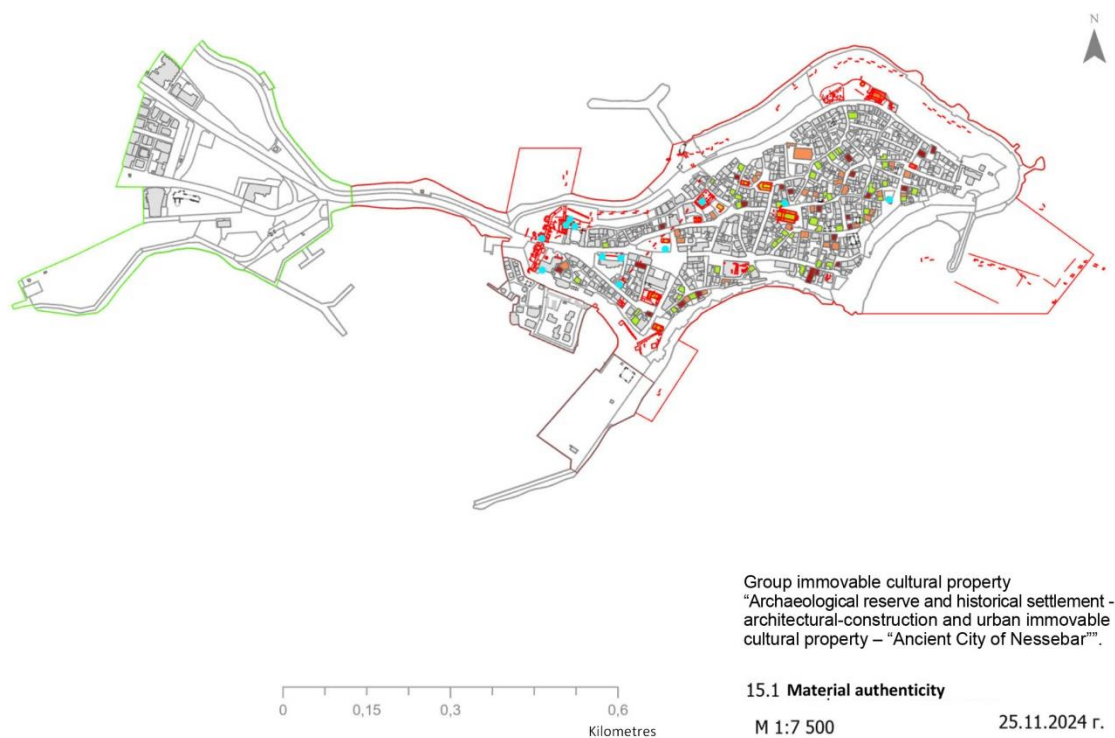
14.1.2 : State of Conservation

21.11.2024

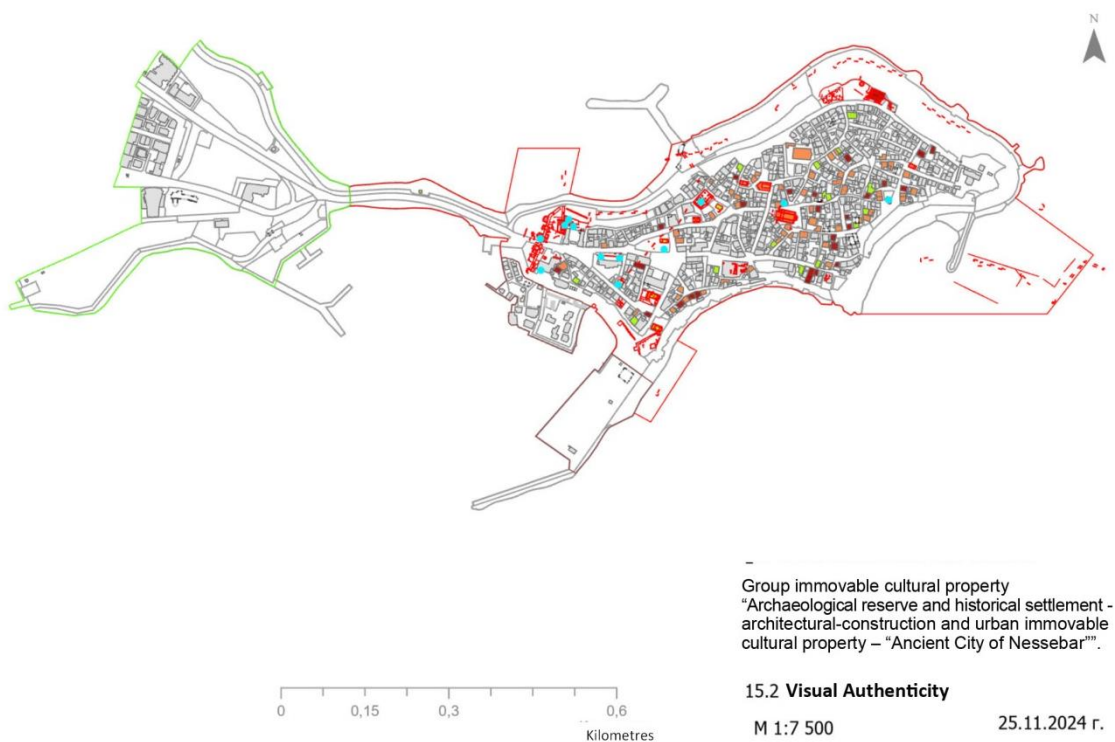
**Fig 4: State of conservation assesment of the Single CHP in the "Ancient City of Nessebar" Source: NIICH (2024)**



## ASSESSMENT OF THE AUTHENTICITY



*Fig. 5: Assessment of the material authenticity of the Single CHP in the "Ancient City of Nessebar". Source NIICH (2024)*



*Fig. 6: Assessment of the visual authenticity of the Single CHP in the "Ancient City of Nessebar".. Source NIICH (2024)*

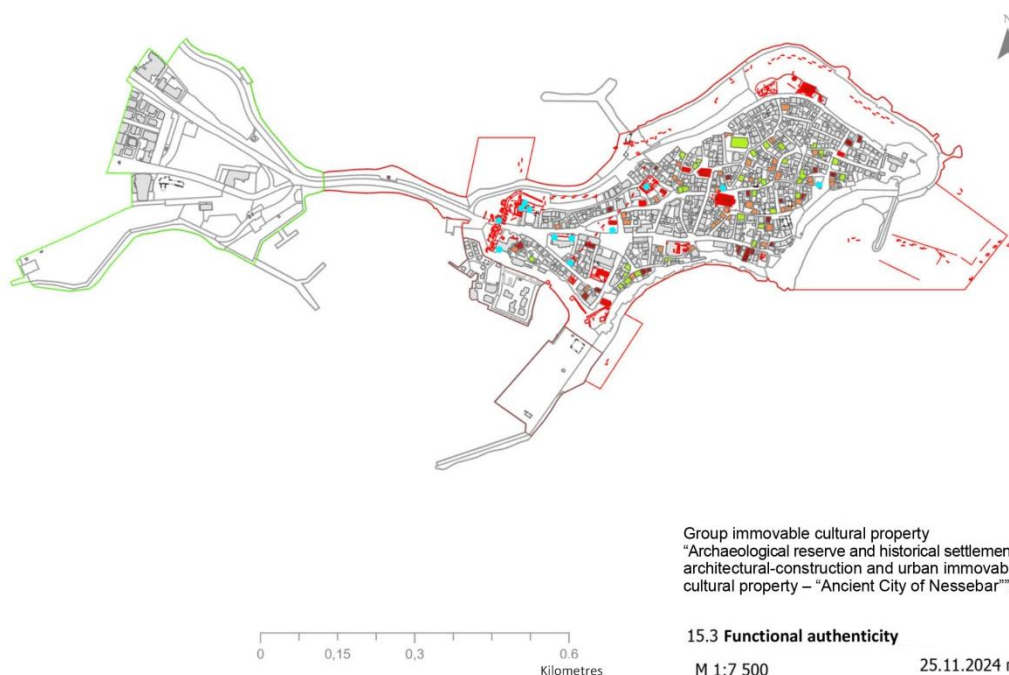


Fig. 7: Assessment of the functional authenticity of the Single CHP in the "Ancient City of Nessebar". Source NIICH (2024)

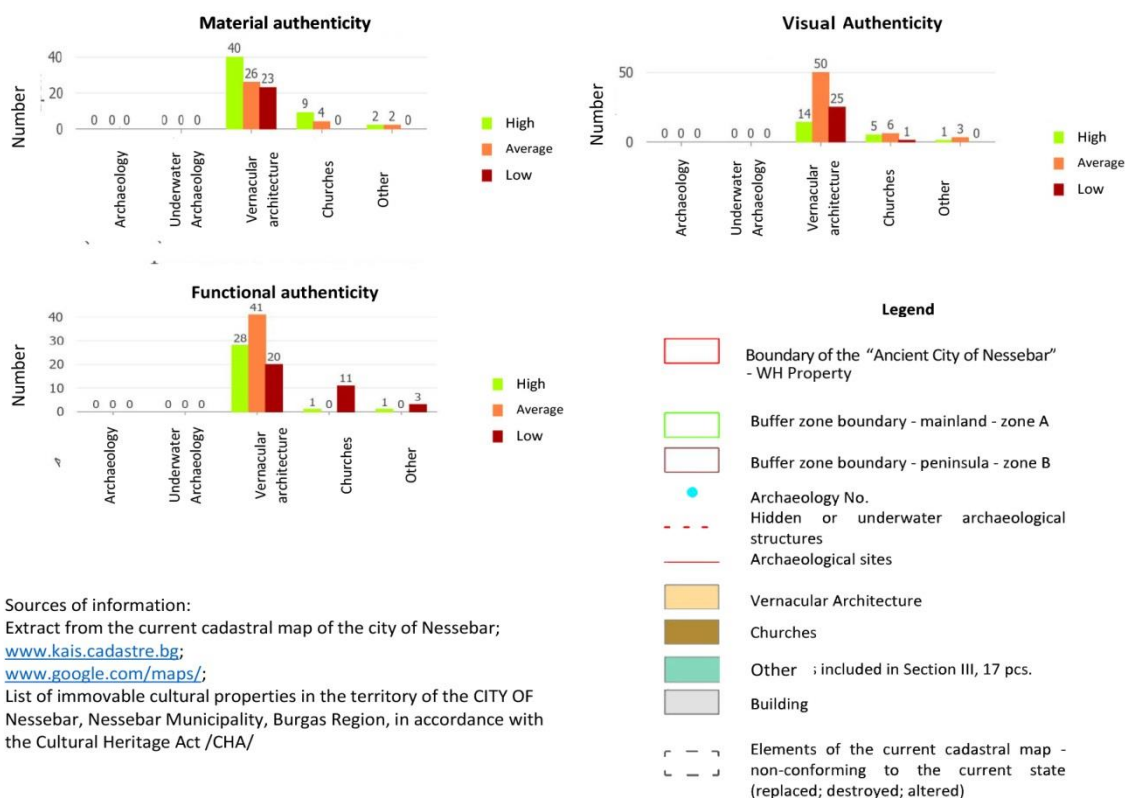


Fig. 8: Data on the material, visual and functional authenticity of the Single CHP in the "Ancient City of Nessebar". Source NIICH (2024)



## Elements on the facades of Single CHP of the WH site “Ancient city of Nessebar”

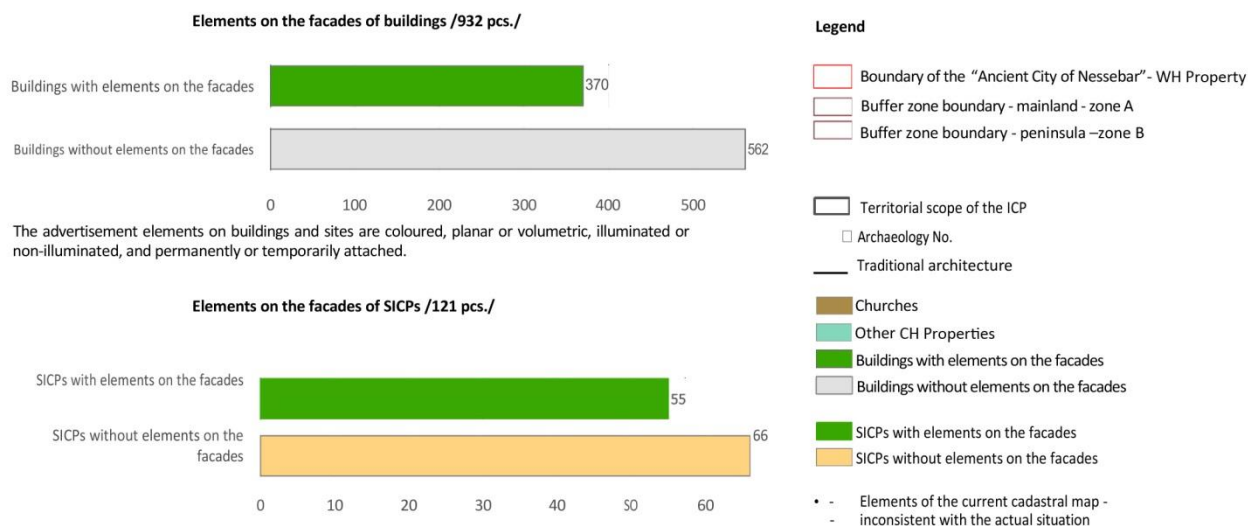


Group immovable cultural property “Archaeological reserve and historical settlement - architectural-construction and urban immovable cultural property – “Ancient City of Nessebar””.

### 11.2.1 Elements on facades

Scale 1:7 500

20.11.2024



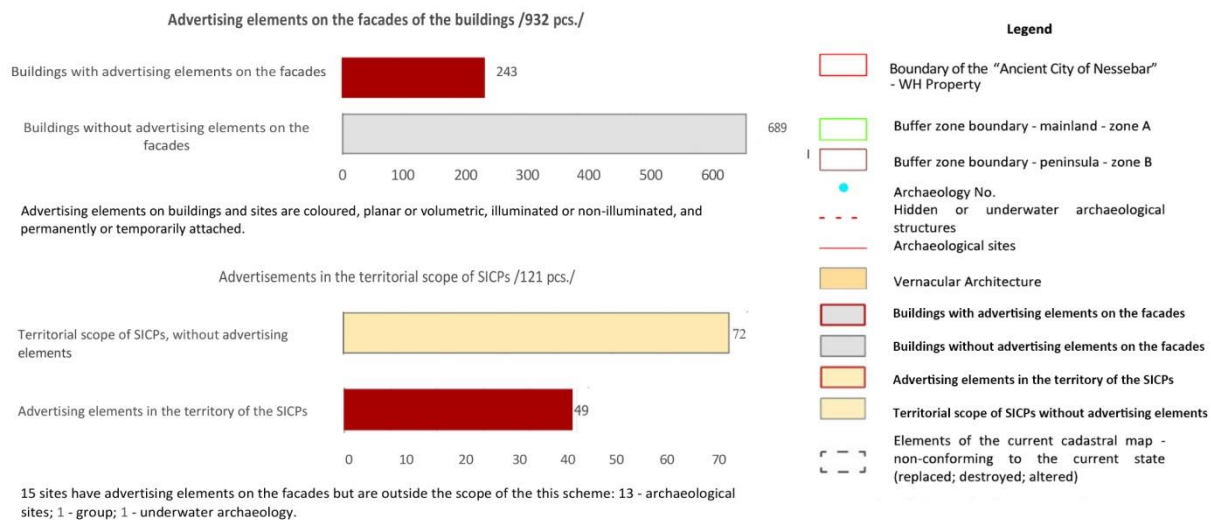
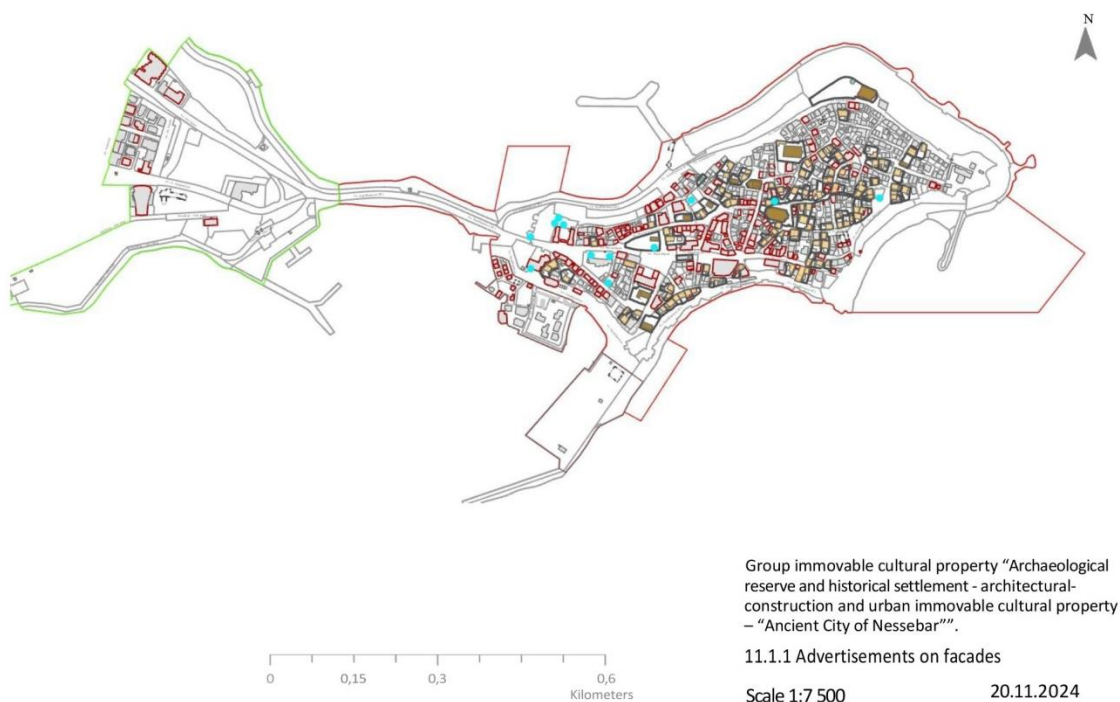
Sources of information:  
Extract from the current cadastral map of city of Nessebar; [www.kais.cadastre.bg](http://www.kais.cadastre.bg);  
[www.google.com/maps](http://www.google.com/maps);  
List of the immovable cultural property on the territory of the CITY OF Nessebar, Nessebar Municipality, Burgas Region, according to the Cultural Heritage Act;  
On-site inspection.

Group immovable cultural property “Archaeological reserve and historical settlement - architectural-construction and urban immovable cultural property – “Ancient City of Nessebar””.

### 11.2.2 Elements on facades

Fig. 9: Elements on the facades of Single CHP of the WH site “Ancient city of Nessebar”. Source NIICH (2024)

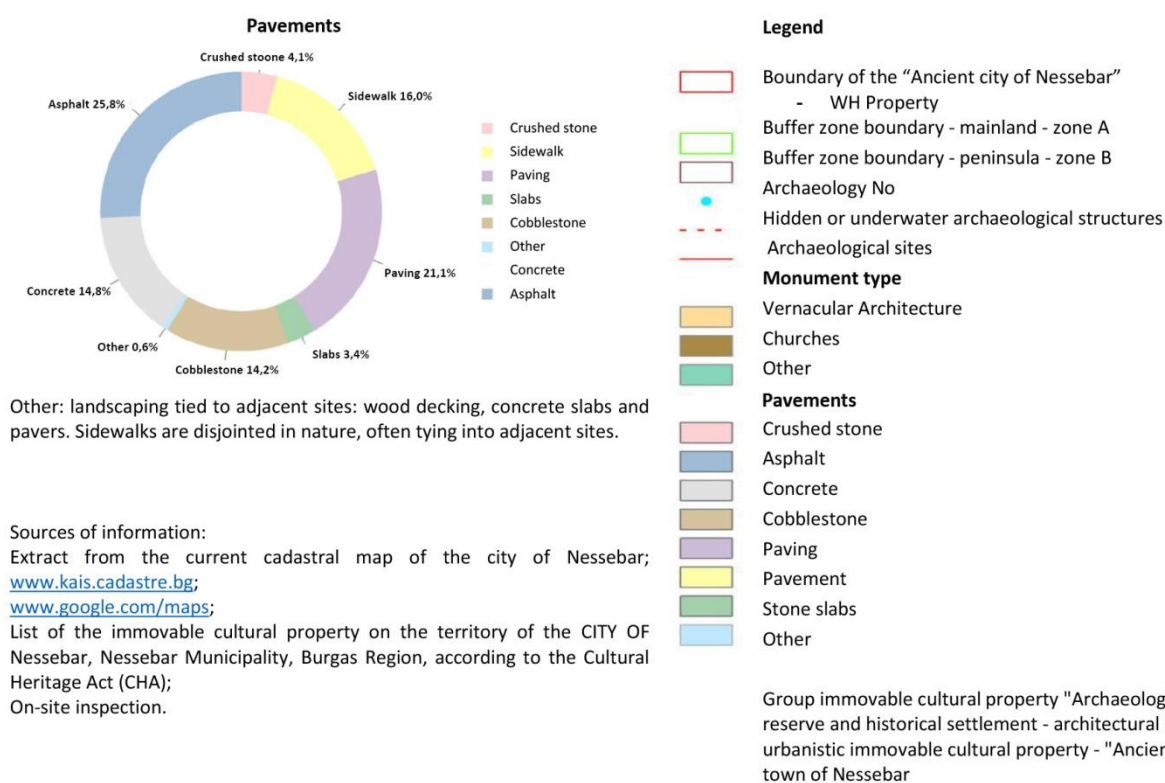
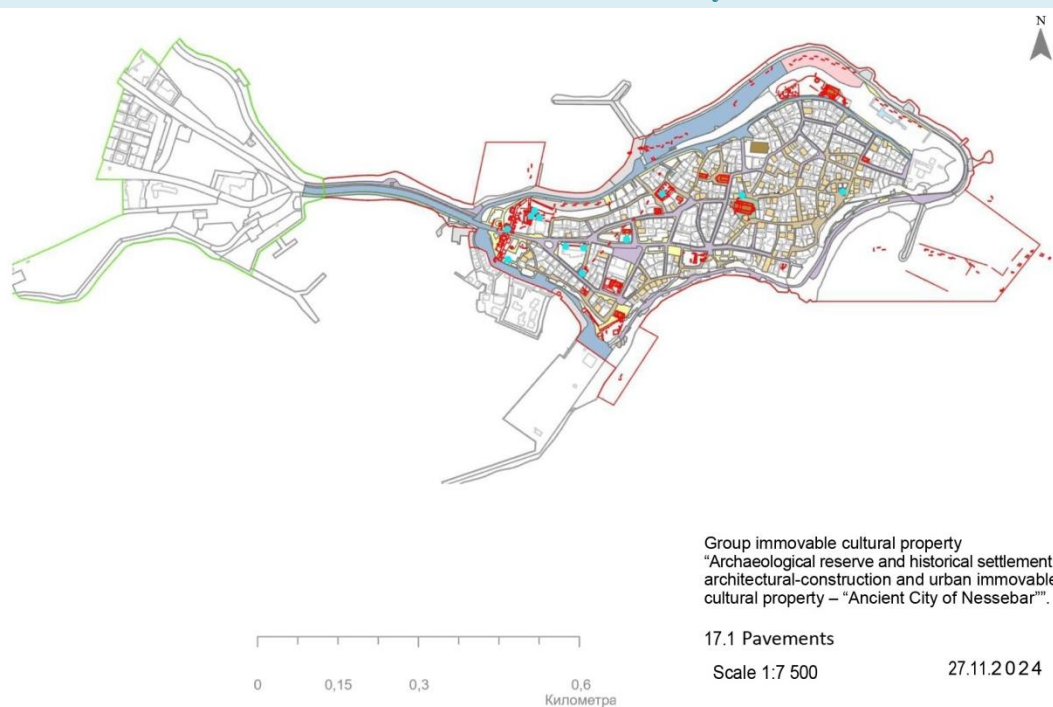
## Advertisements on the facades of the WH site “Ancient city of Nessebar”



Sources of information:  
 Extract from the current cadastral map of the city of Nessebar;  
[www.kais.cadastre.bg](http://www.kais.cadastre.bg);  
[www.google.com/maps](http://www.google.com/maps);  
 List of the immovable cultural property on the territory of the CITY OF Nessebar, Nessebar Municipality, Burgas Region, according to the Cultural Heritage Act /CHA/;  
 On-site inspection.

Fig. 10: Advertisements on the facades of the WH site “Ancient City of Nessebar”. Source NIICH (2024)

## Pavements Scheme within the WH site “Ancient city of Nessebar”



17.2 Pavements

27.11.2024

Fig. 14: Pavements Scheme within the WH site “Ancient city of Nessebar”: Source NIICH (2024)

An analysis is presented with the following main findings:

In the current conservation regimes, single immovable cultural properties (SICPs) are dealt with generically. The groups of key features/attributes identified in the DOUV, Archaeology, Underwater Archaeology, Medieval Churches, Vernacular Architecture and Other, are not distinguished and there are no specific prescriptions for each.

For the archaeological sites: A study was carried out regarding the synchronization of the Archaeological Map of Bulgaria /AMB/ in relation to the List of single Archaeological immovable cultural properties /SAICP/ on the territory of the Ancient City of Nessebar and in its buffer zone contained in the National State Archive of the National Institut for immovable cultural heritage. Not all sites from AMB are reflected in the List, because the data for some of them are not officialized according to the order of Cultural Heritage Act. Inconsistencies and inadequacies in the scientific and cultural field to which some of the properties are reffered are also noted.

Granted status and conservation regimes for SICPs: Over the years, SICPs and their status have been considered many times - 1927, 1964, 1979, 1976, 1986, 1987, 1991, 1992, 2012, etc. However, they are presented and protected as a list of sites, with insufficient and outdated identification data, without individual presentation of their value characteristics. The status of most of the sites does not meet the requirements of the current legislation /CHA/. Of all the sites falling within the scope of the Ancient City of Nessebar, only the Necropolis of Mesembria - Mesembria, which falls partially within the buffer zone of the World Heritage Site, has been assigned protection regimes.

The elements of Section III, “buildings without individual qualities of architectural immovable cultural property, but contributing by their volume and scale to the spatial construction of the reserve”, are not identified as SICPs and their protection is only according to the list, within the group property. Their identification data is incomplete or outdated. As a consequence, they have not been monitored, and the prescriptions for protection applying to all buildings without heritage status apply to them. To date, there is no information on exactly which buildings in the described land plots participate with their volumetric and architectural characteristics in the historic urban environment of the World Heritage Site, nor have any observations been carried out on their condition.

On several occasions over the years, sites have been removed from the List of monuments (now immovable cultural property) - 1981, 1987 and 2007 (the mill, now built into a hotel in the buffer zone in the new city).

Necessary follow-up activities are also proposed:

- To complete the ongoing update of the immovable cultural heritage sites in the territory of the Ancient City of Nessebar.
- To define individual regimes (boundaries and prescriptions for protection) of all ICPs falling within the scope and the buffer zone of the Ancient City of Nessebar.

- The groups of key elements/attributes identified in the SOUV to be derived in the conservation regimes of the Ancient City of Nessebar and specific prescriptions to be defined for each of them.
- To synchronize the Archaeological Map of Bulgaria /AMB/ and the List of SICPs on the territory of the Ancient City of Nessebar and its buffer zone according to the CHA /the List/. For the archaeological sites to determine the boundaries, territorial scope, individual prescriptions for protection.
- To clarify cases where other ICPs from another scientific field are located on archaeological sites. To clarify cases where there are sites registered only with the AMB.
- For the sites in Section III, monitoring should be carried out to determine their condition. To describe them in the conservation regimes of the Ancient City of Nessebar and define specific prescriptions for this group of elements.

The documentation prepared by the NIICH and external experts as a result of the previous monitoring exercises and the Territorial Programme are of utmost importance to provide the necessary information basis for the elaboration of the CMP.

**Since 2018, a program has been launched to study, document and present the graffiti from Nessebar churches** according to modern standards and technical possibilities. It involves the Center for Underwater Archaeology, the Archaeological Museum Nessebar and the Balkan Heritage Foundation. The programme is financially supported by the Ministry of Culture and the Balkan Heritage Foundation.

More than 300 single or group graffiti on the ships are preserved in four medieval and post-medieval churches in Nessebar - Church of St. Spas, Church of St. Todor, Church of St. Stephan (the New Metropolia) and Church of St. John Aliturgetos. The graffiti represent an important source of knowledge about the seafaring and shipbuilding on the Western Black Sea coast, about the worldview, beliefs and traditions of the local population, and provide new perspectives on the relationship between the Ancient City of Nessebar and its seascape. In addition to ships, individual graffiti of animals, people, buildings and hundreds with personal names and years are incised in the churches.

In 2023 and 2024, work continued on processing of the large array (database) of documented graffiti and the preparation of their publication in catalogues (corpus of graffiti from Nessebar). The main contribution to this has been made by Dr. Zdravka Georgieva. Recently she successfully defended her PhD thesis at the Centre for Maritime Archaeology, University of Southampton the main part of which “Post-medieval seafaring in the Western Black Sea: archaeological and iconographic evidence” is an analysis of graffiti from Nessebar churches. Research results have been published in articles in Bulgarian and English and presented in poster exhibitions and presentations at international events - New Delhi, India, Riyadh, Saudi Arabia, Istanbul, Türkiye, Southampton, Great Britain, Sozopol and Varna, Bulgaria.

#### **ON THE FOLLOWING FOUR RECOMMENDATIONS FOR THE MEDIEVAL CHURCHES:**

*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.*



*Pavements and spaces around medieval churches*



*Church "St. Spas" (1604)*



*Church „St.Paraskeva”*



*Church „St. John the Baptist”*

*Fig. 11, 12 u 13: Pavements and spaces around medieval churches; Source: NIICH archive*

The medieval churches “St. Stephan”, “St. Paraskeva” and “St. John the Baptist” and their adjacent spaces have been restored, landscaped and socialized. The medieval church of St. John Aliturgethos has also been restored. The public spaces around the churches of St. Spas and "Pantocrator" (St. Nicholas) have also been improved. The pavement around all the medieval churches is paved with stone slabs. Although the architectural framework around some of the churches has been improved following the removal of illegal parts of structures, their historic environment has not yet been fully restored.

- *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.*

- *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).*

- *Undertake a comprehensive programme of stabilisation, conservation and restoration of the Church of Christ Pantocrator and the necessary restoration works in the Church of St. Michael and St. Gabriel.*

- By the ordinances on the order and conditions for placing and removing of movable sites, advertising-information and monumental-decorative elements and on the order and conditions for conducting commercial activities in the open air on the territory of Nessebar Municipality, it is prohibited to place facilities around the sites - immovable cultural properties, in front of commercial sites, on the walls and fences of the houses in the city of Nessebar - old part and it is required that the schemes for the placement of advertising and information elements on properties - immovable cultural values, as well as for the placement of movable objects within their boundaries and buffer zones, before their submission for approval to be coordinated under the conditions and in accordance with the procedure of the Cultural Heritage Act. According to the information from the Municipality of Nessebar, these provisions are respected, although movable elements (awnings, umbrellas) can still be seen in places.
- Traditional public spaces on the peninsula are used for outdoor cultural events involving young people as well as children (concerts, theatre performances, exhibitions) and for the presentation of intangible cultural heritage: European Folklore Championship; International Children's Festival “Nessebar - Island of Arts”; Theatre Festival; Eleventh Fish Festival “Autumn Passages” (18-20 October); International Festival “Folklore Shades”; International Choir Festival for Sacred Music “ Rejoice, Virgin Mary!” (at the “Old Metropolia” (St. Sofia); International Folklore Festival “Nessebar Nakit”, etc.
- Nessebar Municipality has installed technical means for year-round restriction of motor vehicle traffic around the churches “St. Todor”, “Old Metropolia” (St. Sofia) and “St. Stephan”, which contributes to a better visual perception of the monuments.
- For the church “**St. Michael and Gabriel**” (church of the Archangels) a technical project for protective covering, conservation, restoration, exposure and socialization has been prepared and



coordinated by the Ministry of Culture and a building permit has been issued. In 2023, a project for emergency conservation and restoration works was financed for the church under the programme “Preservation of Immovable Cultural Heritage” of the Ministry of Culture.

A contract has been signed with the Museum “Ancient Nessebar”.



*Fig. 14: Church "St. Michael and Gabriel" (church of the Archangels); Source: Municipality of Nessebar*

- A technical project for conservation, restoration, exposure and socialisation has been prepared and agreed for the **Pantokrator Church (St. Nicholas)** and a building permit has been issued. In 2023, a project for emergency conservation and restoration works was financed for the church under the programme “Preservation of Immovable Cultural Heritage” of the Ministry of Culture. A contract has been signed with the Museum “Ancient Nessebar”.



*Fig. 15: Church "Pantocrator" (St. Nicholas); Source: Municipality of Nessebar*



- In 2023, under the project “Conservation, restoration and study of the technique and technology of icons from the collection of the Museum “Ancient Nessebar”, **icons from the iconostasis of the church “St. Stephan” were preserved, restored and returned to their places.** Terms of references were prepared and agreed for the churches "St. Virgin of Eleusa"; “St. Todor”; “St. Dimitar”; “Old Metropolia” (St. Sofia).



*Fig. 16: Church "St. Stephan" (New Metropolia), interior with iconostasis; Source: Ivo Hadjimishev*



*Fig. 17. The restoration of the iconostasis of St. Stephen's Church by restorers from the Museum "Ancient Nessebar"*



- *Develop and implement educational programmes with schools to promote knowledge and appreciation of heritage among young people.*

In November 2023, the exhibition “Ancient City of Nessebar - Synergy of Intangible, Tangible and Underwater Cultural Heritage” was presented at the Artium Center in Nessebar, dedicated to 40 years since the subscription of “Ancient City of Nessebar” on the UNESCO World Heritage List, organized in partnership with the Municipality of Nessebar, Sofia University “St. Kliment Ohridski”, Center for Restoration of Artworks - Sofia and Center for Underwater Archaeology. It was held under the patronage of the National Commission of the Republic of Bulgaria for UNESCO- Bulgaria, the Ministry of Culture and the Regional Centre for Safeguarding of Intangible Cultural Heritage in South-Eastern Europe under the auspices of UNESCO and was funded as part of the activities of the project “CultUrEn - Cultural Heritage as a Factor for Achieving a Sustainable Urban Environment” of the Scientific Research Fund of the Ministry of Education and Science. Cultural properties and their synergies are shown in the context of the Convention concerning the Protection of the World Cultural and Natural Heritage (1972), the Convention on the Protection of the Underwater Cultural Heritage (2001) and the Convention for the Safeguarding of the Intangible Cultural Heritage (2003). The focus is on the rich diversity of heritage and cultural assets, which carry the memory of various cultures and whose tangible and intangible traces are embedded in the historic urban fabric.







**Fig. 18: Fragments from the exhibition "Ancient City of Nessebar - Synergy of Intangible, Tangible and Underwater Cultural Heritage", dedicated to the 40th anniversary of the inscription of the "Ancient City of Nessebar" on the UNESCO World Heritage List; Source: Personal archive**

At the end of 2023 the Centre for Restoration of Artworks, Sofia University "St. Kliment Ohridski, Nessebar Municipality and SU "Lyuben Karavelov", city of Nessebar organized a forum "Ancient City of Nessebar and its Immovable Cultural Heritage", at which the digital platform "Messembria" was presented and a discussion was held on the topic "The Challenge of Living in a World Heritage City - Focusing on the Local Youth Community". Results of a sociological survey among teachers and students from two age groups, grades 5-7 and 8-12, on the level of awareness, attitudes and ideas on the topic "Ancient Nessebar - a World Heritage City", conducted within the framework of a project funded by the National Fund "Culture", are presented. The respondents mentioned the most recognizable as the Mill, the Fortress Walls, the Ancient Theatre, the Church Old Metropolia (St. Sofia) and the Archaeological Museum<sup>1</sup>. The answers revealed a predominance of medieval churches over Renaissance houses. 71.9% of the students of 5-7 grade and 57.1% (8-12 grade) know when Nessebar was inscribed on the World Heritage List, but the

<sup>1</sup> Excerpts from a sociological survey on awareness, integration, attitudes and ideas on the topic "Ancient Nessebar - a city of world cultural heritage" "Statistical data by age groups: 5-7 grades - the windmills (83.1%), the fortress walls (78.1%), the Ancient Theater (75.3%), the church "St. Sophia" (66.3%), the Archaeological Museum (51.1%); 8-12 grades - the windmills (89.3%), the fortress walls (75%), the Ancient Theater (75%), the Archaeological Museum (75%), the church "St. Sophia" (71.4%). A shift in positions as a result of accumulated awareness and consciousness, as well as a greater concentration of answers, is seen among the surveyed teachers, of whom 100% of the answers are in first place for St. Sophia, followed by the Church of Jesus Christ Pantocrator (84.6%), the windmills (76.9%), the fortress walls (76.9%) and the Church of the Assumption of the Virgin Mary (69.2%)."

(78.1%), the Ancient Theater (75.3%), the church "St. Sophia" (66.3%), the Archaeological Museum (51.1%); 8-12 grades - the windmills (89.3%), the fortress walls (75%), the Ancient Theater (75%), the Archaeological Museum (75%), the church "St. Sophia" (71.4%). A shift in positions as a result of accumulated awareness and consciousness, as well as a greater concentration of answers, is seen among the surveyed teachers, of whom 100% of the answers are in first place for St. Sophia, followed by the Church of Jesus Christ Pantocrator (84.6%), the windmills (76.9%), the fortress walls (76.9%) and the Church of the Assumption of the Virgin Mary (69.2%)."

knowledge about the value and about the individual properties is unsatisfactory. The study summarizes that *“among the youth audience there is a basic knowledge of the types of cultural heritage that make up the characteristic image of the Ancient City of Nessebar and assessed in their complexity as a world cultural property - archaeological, architectural, historical, religious, natural and underwater cultural heritage. At the same time, there is a significant percentage of wrong answers, such as preserved remains of Thracian tombs (grades 5-7 - 54.5%, grades 8-12 - 46.4%). The old name, sites represented in images, and their functionality in historical retrospect were recognized. The level of knowledge of the sites and their association with historical periods is not sufficient to speak of awareness of historical layers in relation to the heritage of the city. The results of a question related to intangible cultural heritage point us towards the same criticality of analysis. Among the characteristic traditions, crafts and customs, along with the leading positions for fishing and crafts related to it (92.7% - grades 8-12), with the liturgical processions and festivals (60.7% grades 8-12), carnival festivals were also mentioned (35.7% of respondents in the age group 8-12).”*<sup>2</sup>

As the main reasons for the low level of knowledge of the Ancient City's Cultural Heritage, the teachers identified:

- *“the lack of initiatives to engage the youth audience (50%);*
- *the lack of organisation of presentations and thematic talks (41.7%);*
- *disengagement due to lack of awareness of the value of the cultural heritage (41.7%)*
- *lack of interactivity in the presentation (33.3%).”*

A significant majority of respondents (69.2%) emphasized that importance to create more interactive learning opportunities in an out-of-school setting, as well as holding more heritage-focused events (61.5%), organizing museum classroom lessons (61.5%), and making heritage more widely available through the Internet (30.8%). To reach children and young people through education, initiatives and projects<sup>3</sup> are needed, aimed at developing interaction between institutions to better understand cultural heritage, organising more events aimed at them (92.3%), awareness (61.5%), funding (46.2%), targeted government policy (15.4%). The predominant responses of the respondents (teachers) show recognize the potential of cultural heritage interaction with the urban environment and improving the quality of life (69.2%). It is indicated that educational programmes contain untapped potential in terms of the city's cultural heritage.

The History and Civilization curriculum includes a module on Cultural Heritage, which is divided into specific units and thematic sections. *“The expected learning outcomes are related to national and world cultural heritage, distinguishing characteristic monuments of national and world culture; describing the emergence of religions and their main elements and examples of mutual influences between different cultures; identifying synchronicity in the cultural development of societies; appreciating the importance of European contributions to world cultural heritage; identifying different architectural styles and giving examples of European influences on the*

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<sup>2</sup> **Istatkova, A.** (2024), The World Cultural Heritage of the Ancient City of Nessebar and the Local Youth Community - Memory, Actions, and Interactions in *Proceeding form National conference of Preservation of Immovable Cultural Heritage in Bulgaria*, organized by the Bulgarian National Committee of ICOMOS and the Architectural Heritage Society of the Union of Architects in Bulgaria

<sup>3</sup> Only 15.4% of teachers have participated in programmes/projects/initiatives focusing on the cultural heritage of the “Ancient City of Nessebar” (participation in initiatives of the Archaeological Museum “Ancient Nessebar”, publication of a calendar with the sights of Ancient Nessebar and a presentation competition on the same topic.

*spiritual life of the Balkans. The knowledge and, consequently, the expected results are cumulative in the different grades of junior high and high school.”*

In 2024, in connection with the opportunity for funding projects under the UNESCO Participation Programme, through the Bulgarian National Commission for UNESCO, Sofia University “St. Kliment Ohridski” in partnership with the Municipality of Nessebar and SU “Lyuben Karavelov”, “Center for Cultural Heritage and Architecture” and “Center for Restoration of Artworks” submitted a project proposal on the topic: “Educational Capacity Building for Youth Audiences Focused on the Tangible and Intangible Cultural Heritage of the Ancient City of Nessebar”, aimed at age groups from 1<sup>st</sup> to 4<sup>th</sup> grade (up to 10 years of age), from 5<sup>th</sup> to 7<sup>th</sup> grade (up to 13 years of age), the so-called “Generation Alpha” and from 7<sup>th</sup> to 12<sup>th</sup> grade, the so-called “Generation Z”. The project foresees the production of open access electronic resources, including short films and hands-on activities with highlights of tangible and intangible cultural heritage, seeking narrative through artefacts and using contemporary approaches to heritage interpretation. Key themes important for provoking a sense of identity with the city's heritage are touched upon, such as “Do I know my family history and the history of the house I grew up in?”; “How do I protect cultural heritage?”; “How can I participate in its management?”; “What is community-based tourism?”. The project has been approved by the Bulgarian National Commission for UNESCO. Information on funding is awaited.

In March 2024, demonstrations and hands-on activities were held in the completely renovated Ethnographic Museum - Nessebar (the building is an immovable cultural property) and open history lessons were held in the Nessebar Archaeological Museum for children from schools with a concentration of vulnerable groups in order to achieve better integration of children in the local and national community. This educational activity reflects the implementation under priority 1 of the Cultural Heritage Strategy of Nessebar Municipality “ Sustainable Development of Cultural Heritage”, objective 1.1 “Social Inclusion”.



**Fig. 19: Ethnographic Museum (immovable cultural property with category**



*"national significance"); Source. Ancient Nessebar Museu*

In the framework of Objective 2.3 of the Strategy “Presentation, Interpretation, Valorization and Promotion of Cultural Heritage”, the project “Revitalized Spaces in the World Cultural Property Ancient City of Nessebar - Ethnographic Museum” was implemented, within the framework of which an interactive panel “Nessebar Houses” was installed. The museum is equipped with tablets and openable cabinets for gamification of the exposition. Within the same project, videos have been filmed and published, dedicated on the Archaeological Museum “Ancient Nessebar”<sup>4</sup> and Renaissance houses in the town<sup>5</sup>.

- *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.*
- *Inventory all permits issued by the Municipality of Nessebar for all development / infrastructure / urban transformation projects within the property and its setting.*

Building permits are issued under conditions defined in the Spatial planning Act, which require the presence of an approved investment project and a deadline for their issuance, as well as for their use. The cases in which the building permit loses legal effect are also regulated, including "when construction has not started within three years of its entry into force". i.e. the approval of the projects, the issuance of a building permit and the construction itself are interdependent to certain deadlines. Building permits that do not meet the cited requirements cannot be issued and used.

According to the information presented by the municipality of Nessebar, building permits for the period 2023 - 2024. were issued for a total of 4 constructions: for a street water pipeline for RLP II-468 quarter 105 and RLP II-454 quarter 106. (2023 г.); for Conservation, restoration, exposure and socialization of an immovable cultural property with category “national importance” Church of St. Michael and Gabriel; for Conversion of part of the ground floor of an existing residential building into a shop and terrace to the first floor of the building,; for Reconstruction, alteration and major refurbishment - volume reduction, re-facing and pitched roof with terraced setbacks of existing hotel, 1 Lyuben Karavelov Str. in the “New Town” (*the hotel with the built-in mill*). The first three sites are within the boundaries of the Ancient City of Nessebar, and the last one is within the boundaries of the buffer zone of the World Heritage site on the mainland and within the boundaries of the archaeological immovable cultural property "Necropolis Mesembria-Mesambria".

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<sup>4</sup> <https://www.youtube.com/watch?v=LgdUK-f9FuU>

<sup>5</sup> [https://www.youtube.com/watch?v=lq\\_bair-VfA](https://www.youtube.com/watch?v=lq_bair-VfA)

| BUILDING PERMITS ISSUED FOR 2023-2024 |                                    |  |                                    |                                 |  |                  |   |
|---------------------------------------|------------------------------------|--|------------------------------------|---------------------------------|--|------------------|---|
| No                                    | No and date of construction permit | Construction   | Location                           | LP Identifier                   | tr.  | PI               | Assignor (individual-full name, legal person represented by ...) UCN or UIC |
| 1                                     | 254/<br>16.11.2023                 | Street water pipeline for Regulated land property II-468, neighborhood 105 and Regulated land property II-454, neighborhood 106                        | Ancient City of Nessebar           | 51500.501.450 and 51500.501.490 | 05 and 106   | I-468 and II-454 | Municipality of Nessebar  |
| 2                                     | 68/<br>21.02.2024                  | Conservation and restoration interventions on the church St. Archangels Michael and Gabriel  | Ancient City of Nessebar           | 51500.501.104                   | 10   | V                | Municipality of Nessebar  |
| 3                                     | 123/<br>22.04.2024                 | Commissioning of part of the ground floor of an existing residential building into a shop and a terrace to the first residential floor of the building | Ancient City of Nessebar           | 51500.501.91                    | 9  | II-231           | Elena Hristova Yapadjieva   |
| 4                                     | 170/<br>10.07.2024                 | Reconstruction, reduction of volume, overhaul of facade and pitched roof with terraced recesses of a hotel   | Nessebar                           | 51500.502.313                   | 54   | VIII-639         | "B.H.Air" Ltd   |
| LE<br>GE<br>ND                        | LANDSCAPING AND INFRASTRUCTURE     |  | CONSERVATION AND RESTORATION WORKS |                                 | REPAIRS TO EXISTING BUILDINGS<br>CHANGE OF PURPOSE |                  |   |

Detailed information on the issued building permits for the period 2011-2022 is presented as **Annex 2** in an Excel spreadsheet.

In his letter of July 2024 to the Chief Architect of Nessebar Municipality, the Ministry of Culture has paid attention to a number of requirements from the report of the reactive monitoring mission conducted in January 2023. and the Decisions of the World Heritage Committee related to: maintaining a moratorium on new construction on the territory of the Ancient City of Nessebar until the approval of the Conservation and Management Plan, the General Development Plan and



the Detailed Development Plan, limiting possible interventions on the urban structure and landscape of the peninsula only to emergencies and to restoration activities, noting that the submitted for approval in 2023 design documents for the World Heritage site are not accompanied by an assessment of the individual and cumulative impacts of proposed developments on its Outstanding Universal Value, as required by the mission.

- *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.*

From the information provided by NIICH on the project documentation submitted for coordination (*Annex 3*), it is established that during the period under consideration (2023-2024) there were no projects for new buildings coordinated on the territory of the Ancient City of Nessebar and in its buffer zone.

#### *Agreed projects:*

- For the church “St. Michael and Gabriel” - architectural opinion, structural opinion, technological prescription for emergency conservation and restoration works (*architectural and construction ICP of national importance or significance; within the boundaries of the Ancient City of Nessebar*);
- For the church “St. Clement” - project for conservation, restoration, exposure and socialization (*architectural and construction and artistic ICP; within the boundaries of the Ancient City of Nessebar*);
- Project for Amendment of the Detailed Development Plan - Regulation and Building Plan for RLP II-23, quadrant 21 according to the plan of the city of Nessebar - Old part, 4 Neptune Str. /father's house of Orthodoxi Kostadinov Kalofofov/; part: Urban planning; phase: Final project, (ICP with the category “for information”; within the boundaries of the Ancient City of Nessebar);
- Design visa for “Conversion of the ground floor of the Lyuben Karavelov Secondary School, into a computer modeling, information technology and interest room” (*within the boundaries of the Ancient City of Nessebar; the building is not an ICP*);
- Design visa for: “Conversion and change of purpose of a basement into a kitchen and part of the first floor of a residential building into a catering and entertainment establishment (CEE) in RLP IV-285, quarter 2, city of Nessebar, 1 Mitropolitska Str. (*within the boundaries of the Ancient City of Nessebar; the building does not have the status of a ICP*);
- Project for Amendment of Detailed Development Plan - Regulation and Development Plan (DSP-RDP) and Working Development Plan (WSP) for RLP II-”for seaside park with public services, pumping station, transformer station and landscaping”, RLP III-”for

landscaping” in quadrant 78 (*within the boundaries of the Necropolis of Mesambria-Mesembria on the mainland*);

- Design visa for: “Conversion and change of purpose of a basement into a kitchen and part of the first floor of a residential building into a catering and entertainment establishment (CEE) in RLP IV-285, quarter 2, city of Nessebar, 1 Mitropolitska Str. (*within the boundaries of the Antient City of Nessebar; the building does not have the status of a ICP*);
- Project for Amendment of Detailed Development Plan - Regulation and Development Plan (DSP-RDP) and Working Spatiakl Plan (WSP) for RLP II-”for seaside park with public services, pumping station, transformer station and landscaping”, RLP III-”for landscaping” in quadrant 78 (*within the boundaries of the Necropolis of Mesambria-Mesembria on the mainland*);
- Design Visa and Modifications according to Art. 154 of the SPA of the approved Investment Project to Building Permit No. 39/25.03.2005 for the site: “Conversion, reconstruction and change of the facade of a multi-family residential building, technical project in parts architecture and structures, RLP IX-795, quarter 78 according to the plan of the city of Nessebar, 1 Khan Krum Str. (*within the boundaries of the Necropolis of Messambria-Mesemvria on the mainland*);
- Design Visa for the reconstruction of the sewage system along Tsar Simeon Str. and Emergency repair of domestic sewage and fecal sewerage along Tsar Simeon Str. in the section between Mesembria Str. and Mena Str. (*within the boundaries of the Ancient City of Nessebar*);
- Design Visa for “Energy renovation of buildings for culture and art” in RLP I municipality, quarter 37 city of Nessebar (*does not have the status of ICP. Within the boundaries of the Ancient City of Nessebar*).
- Investment project for emergency conservation and restoration interventions at the "Christ Pantokrator" church in the city of Nessebar, UPI I-321, quarter 56, str. "Mesambria" No. 1, parts: Technology for CRW, Architectural opinion, Constructive opinion (*ICP with the category of "National Significance"; within the boundaries of the Ancient City of Nessebar*);
- Project for "External power supply of reconstruction, volume reduction, major repairs of facade and pitched roof with terraced setbacks of hotel building, RLP VIII, quarter 54; Sub-object: cables; part: Electro; phase: Technical design (*no status of ICP; within the the mainland buffer zone of the Ancient city of Nessebar*)
- Investment project for site: "Recreation and attraction", UPI I and UPI II, quarter 78 per; Sub-object 2: External and site water supply networks; part: plumbing; phase: Technical project (*within the borders of the mainland buffer zone of the Ancient city of Nessebar*).

#### ***Consistent with requirements or partially consistent:***

- Investment project for the site: “Street water supply for RLP II-468, quarter 105 and RLP II-454, quarter 106 according to the plan of the city of Nessebar - Old Town, Nessebar Municipality”; parts: Water Supply, Geodesy and Fire safety; phase: Technical project; (*on*

*the territory of the buffer zone of the peninsula; coordinated with a requirement for monitoring by an archaeologist);*

- Pre-investment study for the reconstruction, volume reduction, major repairs of the facade and pitched roof with terraced setbacks of the existing hotel, 1 Lyuben Karavelov Street (*within the boundaries of the Necropolis of Mesambria-Mesembria on the mainland. Does not have the status of ICP, agreed with the requirements*).
- Design visa and technical investment project for reconstruction, remodeling and major renovation - volume reduction, re-facading and pitched roof with terraced setbacks of existing hotel, 1 Lyuben Karavelov Str., RLP VIII-639, quarter 54 on the plan of city of Nessebar, as well as a Volumetric and Planning Study; (*within the boundaries of the Necropolis of Mesembria-Mesembria on the mainland. It does not have the status of an ICP, coordinated with the requirements*);

*Detailed information on the site of the last two points is provided in Part IV of the report.*

#### ***Refusals to reconcile:***

- Project for reconstruction, structural strengthening and change of use of an existing summer kitchen in a cafe-aperitif, RLP III-272, quarter 3, 1 Mitropolitska Str.; (*within the boundaries of the Ancient City of Nessebar; does not have the status of ICP; **coordinated design vision; uncoordinated project***);
- Scheme for the placement of relocatable objects and facilities, including additional commercial area under Art. 10, para. 8 of the Development of the Black Sea Coast Act (DBSCA) for the sea beach “Nessebar-East” and investment project for the site: Fast service establishment - commercial site, type “restaurant” and the adjacent additional commercial area, medical point and toilet from the Scheme for movable objects and facilities under Art. 10, para. 8 of the DBSCA on the sea beach “Nessebar East”, Nessebar municipality; parts: Architectural, Structural statement, Plumbing scheme, Electrical scheme; phase: Technical project (TP).

For several projects, no opinions on their eligibility or refusal of consent have been issued to date.

- ***Efforts regarding the removal of illegal additions to buildings and to improving the urban decorum through the replacement of shop signs and external stands, etc. should continue.***

The construction of illegal superstructions and additions with inappropriate architecture on existing residential buildings was mostly realized in the period before the appearance of more hotels in the New part of the city and many hotels in the nearby resort complex “Sunny Beach”, due to the demand of tourists for private accommodation and the desire of the owners for more income during the summer season. This demand is increasingly decreasing, which in turn often leads to the neglect of entire residential buildings or parts of them that have been used for rental.

The RDNCC-Burgas annually submits reports on the implementation of the removal of illegal structures on the territory of the World Heritage Site. For the illegal constructions identified by NICCH and RDNCC-Burgas, consisting mainly in illegal additions of one storey or an attic floor to the respective building, orders for removal have been issued by the Head of the Directorate for National Construction Control with specified deadlines for implementation, the implementation of which is hampered by lengthy court cases or the selection of a contractor, given the requirements that this be carried out by companies authorized to carry out works on immovable cultural property. Some of the orders have been implemented (*Annex 4*).

Control over the legality of the construction is also carried out by the competent authorities of Nessebar Municipality. The Construction Control Department of the Municipality has provided updated data on the removed illegal constructions on the territory of the Ancient City of Nessebar for the period 2023-2024. In 2023, 7 illegal sites (commercial buildings) were removed and in 2024 - three illegal sites (two commercial buildings and a shed attached to a restaurant).

| REFERENCE<br>FOR ILLEGAL CONSTRUCTIONS REMOVED BY THE MUNICIPALITY OF NESSEBAR ON THE<br>TERRITORY OF THE ANCIENT CITY OF NESSEBAR (2023 -2024) |  |                   |                |  |                     |      |
|---|--|-------------------|----------------|--|---------------------|------|
| REMOVED CONSTRUCTIONS IN 2023   |  |                   |                |  |                     |      |
| №   | CONSTRUCTION                           | PROPERTY          | ORDER          | APPEAL                                 | REMOVED             | NOTE |
| 1   | Commercial building<br>No. 3           | 51500.501.35<br>2 |                |  | CP of<br>23.08.2023 |      |
| 2   | Commercial building<br>No. 4           | 51500.501.35<br>2 |                |  | CP of<br>23.08.2023 |      |
| 3   | Commercial building<br>No. 1           | 51500.501.45<br>2 |                |  | CP of<br>23.08.2023 |      |
| 4   | Commercial building<br>No. 2           | 51500.501.45<br>2 |                |  | CP of<br>23.08.2023 |      |
| 5   | Commercial building<br>No. 3           | 51500.501.45<br>2 |                |  | CP of<br>23.08.2023 |      |
| 6   | Commercial building<br>No. 4           | 51500.501.45<br>2 |                |  | CP of<br>23.08.2023 |      |
| 7   | Commercial building<br>No. 6           | 51500.501.45<br>2 |                |  | CP of<br>23.08.2023 |      |
| REMOVED CONSTRUCTIONS IN 2023   |  |                   |                |  |                     |      |
| 1   | Extension to an existing<br>restaurant | 51500.501.343     | 383/26.02.2024 | 13.3.2024<br>Burgas Court<br>of Appeal |                     |      |
| 2   | Commercial building<br>No. 2           | 51500.501.353     |                |  | CP of<br>09.09.2024 |      |
| 3   | Commercial building                    | 51500.501.377     |                |  | CP of<br>22.03.2024 |      |

Projects for interventions in the protected area of the World Heritage Site are assessed by the NIICH and the Ministry of Culture for their compliance with the adopted conservation regimes.

The regional inspectors of the Inspectorate for the Protection of Cultural Heritage at the Ministry of Culture carry out inspections on the territory of the Ancient City of Nessebar and its buffer zone in compliance with the provisions of the Cultural Heritage Act. In 2023 and 2024, nine inspections were carried out on the territory of the World Heritage Site (*Annex 5*). In six of them, illegal interventions were found, consisting of replacement of window frames; opening in a fenced wall and installation of a door; demolition or major renovation of two buildings of the complementary development; construction works in deviation from the agreed project - an illegal terrace, non-reconstruction of the level of an existing slope, thus making the first basement floor appear to be above ground level in relation to the facade above the slope, interventions in relation to exposed archaeological structures - ancient walls and a pathway; illegally placed three mobile catering facilities. Regarding the violations found under the CHA, compulsory administrative measures are applied to the violators to stop the violations and eliminate their consequences. For the violations under the SPA, the Head of the RDNCC-Burgas is instructed, in accordance with the powers granted to him under the SPA, to order an on-site inspection under his jurisdiction, as well as to initiate administrative proceedings. For the relocatable sites - for the cessation of the violation, the Mayor of Nessebar Municipality, in accordance with the powers granted to him under the SPA and Ordinance No. 10 of Nessebar Municipality, is instructed to order an on-site inspection as competent, as well as to initiate administrative proceedings. For Marina Nessebar, the Executive Director of the Executive Agency “Maritime Administration” is instructed, on the basis of the powers granted to him under the Maritime Spaces, Inland Waterways and Ports of the Republic of Bulgaria Act (MSIWPRBA), to order a documentary and on-the-spot inspection under competence, concerning the compliance with the provisions of Ordinance No 9 on the requirements for the operational fitness of ports and specialised port facilities, as well as an inspection of the ongoing reconstruction of the overwater part of the non-self-propelled pontoon BS 330 - Reg. No 614469, with the results of the inspection and the pre-inspection to be submitted to the General Directorate „Inspectorate for the Protection of Cultural Heritage“ at the Ministry of Culture. Two of the sites were found to be non-compliant with the alerts.

The regional inspectors also participated in an acceptance commission for the: “Revitalisation, enrichment of the exposition and minor repairs of Moskoyanov's house - Ethnographic Museum in the town of Moskoyanov” in the Ancient city of Nessebar, where it found that the conservation and restoration activities were carried out qualitatively and in accordance with the project documentation.

Regarding the “trivial commercial activities”, the placement of movable commercial sites is regulated by the municipal council ordinances and Nessebar Municipality assures the observance of this order, but during the summer season we still see stands or other movable facilities placed in inappropriate places. An Ordinance of the Municipal Council also determines the terms and conditions for the placement and removal of advertising and information and monumental and decorative elements as the “Scheme for the placement of advertising and information elements within the boundaries and the buffer zone of the “Ancient City of Nessebar”, before its approval



by the Chief Architect of the Municipality, is subject to coordination under the CHA. According to the same Ordinance, outdoor advertising is not allowed on monuments of culture, sculptural monuments and other elements of decorative sculpture, natural landmarks, trees of any kind and large-sized vegetation. Inspections have shown that most of the buildings on the peninsula have advertising elements on them, as shown in the attached diagram.

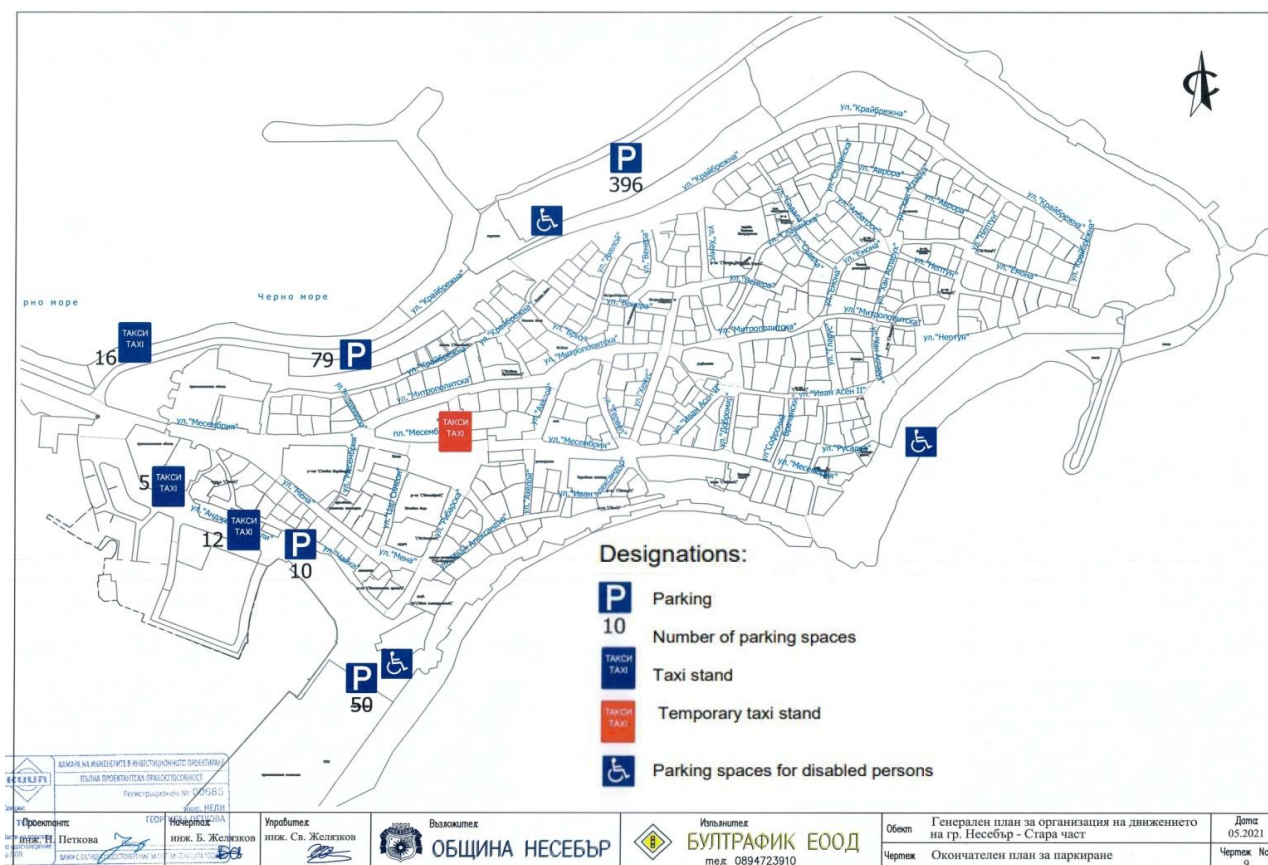
- *Revise the General Plan for the Organisation of the Traffic in accordance with the recommendations provided in this mission report, to minimise the impact of tourist-related traffic on the cultural heritage of the Ancient City.*

With the SOC report of 2022, the Bulgarian State Party, in accordance with item 6 of Decision 44 COM 7B.154 of the World Heritage Committee, submitted to the World Heritage Centre the “General plan for traffic organization (GPTO) of the city of Nessebar - Old Part”, adopted by the Municipal Council of Nessebar and approved by Order No. 41/18.01.2022 of the Mayor of the Municipality. After reading the report of the joint WHC/ICOMOS reactive monitoring mission (*part 2. “Other plans”*) on the parking spaces foreseen by the GTPM in drawing No. 9, the Municipality of Nessebar found that, by mistake, a preliminary draft was sent to the Bulgarian side's report of 2022, the provisions of which have been changed in the draft Master Plan. With the comments on the report of the joint WHC/ICOMOS reactive monitoring mission of the Ancient City of Nessebar held in January 2023, sent by letter No. 04-01-493 dated 05.06.2023 to the Ministry of Culture, the Bulgarian side offered its apologies for the mistake and presented the scheme No. 9 for the parking spaces on the territory of Ancient Nessebar adopted by the GTPM.

The difference in the predictions of the parking spaces in **the approved (diagram 9) "General plan for traffic organization (GPTO) of the city of Nessebar - old part"** and in a previous version sent to the World Heritage Center in 2022. is as follows:

- on the north coast there **are 396, not 900;**
- next to North Buna Fishing Harbour there **are 79, not 70;**
- for Marina 1 and 2 there **are 10, not 75;**
- for the Port Terminal - Sea Station there **are 50, not 54;**
- the taxi spaces correspond in both drawings - **33.**

**The total number of parking spaces provided in the approved GPTO is 568, not 1182 i.e. more than double.**



**Fig.20: Scheme No. 9 to the approved General plan for traffic organization of the Ancient City of Nessebar**

For the period 2023-2024 the Nessebar Municipal Council by its Decisions No. 856 of March 2023 and No. 92 of March 2024 has approved the Traffic Organization and Safety Scheme on the territory of the Ancient City of Nessebar for the summer season 2023 and 2024 respectively. The traffic organization - including directionality, speed regimes and parking spaces on the territory of the city of Nessebar - old part, are defined by the “General plan for traffic organization” as follows:

- traffic speed for the whole peninsula - 20 km/h;
- from 01 April only vehicles with a pass are allowed;
- two checkpoints: checkpoint 1 “Krabrezhnaya” street next to the parking lot “North-big” and checkpoint 2 next to the “Gate”, equipped with automatic barriers, which shall be operated by programmed magnetic cards;
- schedule for stocking of commercial outlets - from 7.30 AM to 11.30 AM;
- access of tourists and guests of the city for accommodation in the accommodation facilities on the territory of the city of Nessebar-old part, as the operators of accommodation facilities can submit data on the registration number of the vehicles to the email: [kpp@nesebar.bg](mailto:kpp@nesebar.bg);
- check-in must be completed within one hour, after which the vehicle is removed to one of the car parking lots. Upon check-out, guests again have one-hour car access to the hotel.

Under the **GPTO**, on-street parking is prohibited except in the designated parking lots: the North Large Parking Lot, the North Small Parking Lot, and the Marine Station Parking Lot. The stopping and parking places for buses operating tourist public transport in the country and abroad are designated as follows: city of Nessebar– old part – for stopping and parking – parking lot “North – large”; city of Nessebar– new part – for stopping and parking – parking lot “Windmill”.

In the “Roadmap” to the Vision for the Ancient City of Nessebar to specific objective 6.2.3. “Improvement infrastructure and opening new cultural spaces” with a permanent period of action is defined the measure “Organization and management of mobility within the peninsula to ensure the peaceful movement of residents, visitors and goods and to achieve a better perception appreciation of cultural heritage sites, the values of the urban historic landscape and the seascape”.

- *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.*

In the Cultural Heritage Strategy of Nessebar Municipality for the period 2023-2032, Priority 2. “Compatible development of cultural heritage”; Specific objective 2.2. “Conservation of the Nessebar Municipality cultural heritage and the OUV of the “Ancient City of Nessebar”, the implementation of a group of activities is foreseen, as well as “creation of planning documents regulating the rehabilitation of the historic urban landscape and the coastline of the mainland”.

In the draft of the Shared Vision for the Future of the Ancient City of Nessebar (2025-2044), on which the CMP for the Ancient City of Nessebar is based, in the Measures and Actions of Priority Area 2: Restoring the overall impact of the traditional „historic urban environment - coastal cultural landscape“ relationship. “Recovering the impact of the traditional link “historic urban environment - coastal cultural landscape”, Strategic Objectives 2.1., Specific Objective 2.2.1. “Restore to maximum extent possible, preserve and aestheticize the landscape character of the peninsula's coastal areas and the „unique coastal relief“ (Criterion iv); a plan is foreseen for the restoration of the mainland coastline within the buffer zone of the property, in order to prevent new development with a negative impact on the landscape, and to create adequate access to the ancient city. At the moment, there are no developed projects / plans for the restoration of the coastline of the mainland.

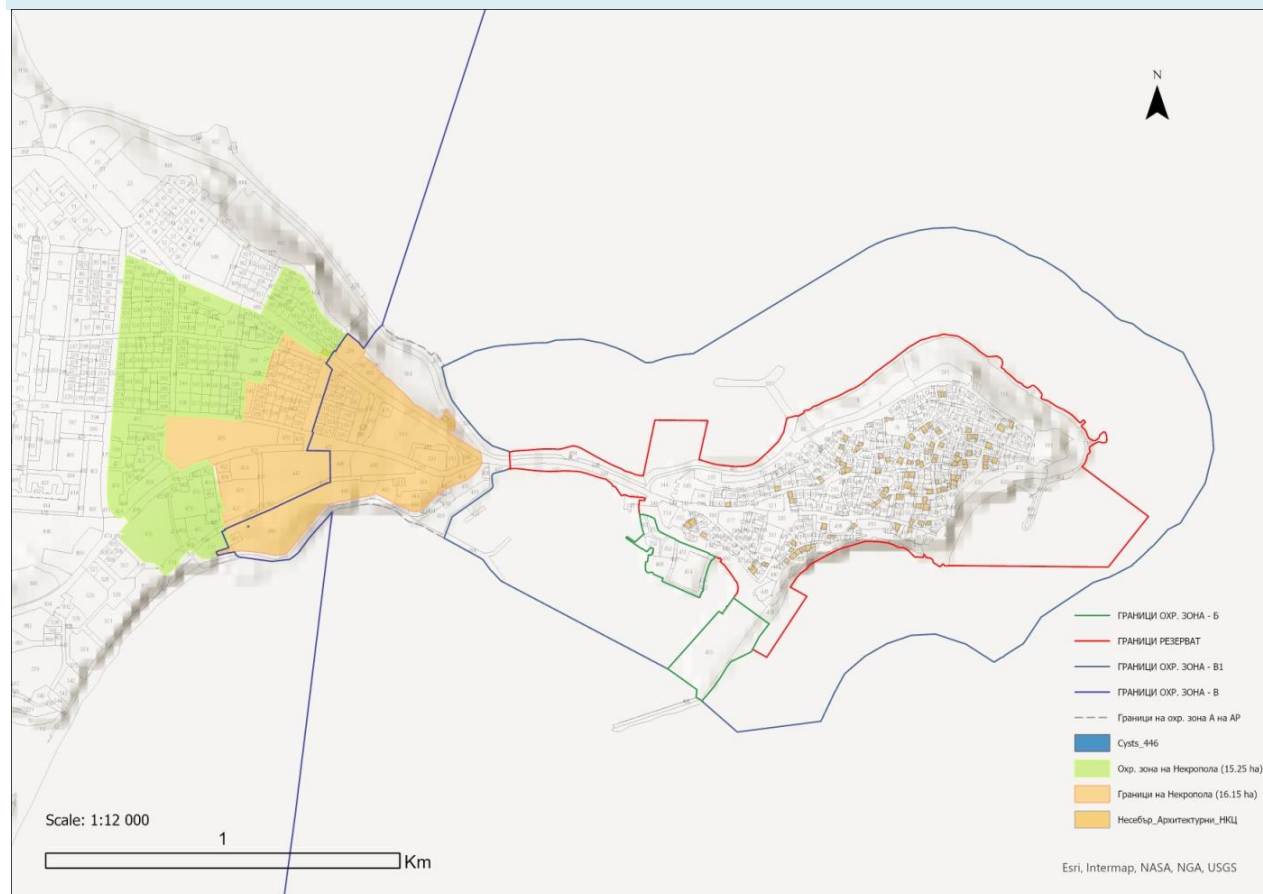
- *Complete the process of declaring the Necropolis as an archaeological site and consider extending the buffer zone of the property to the west to include the main area of the Necropolis; consider using the Necropolis as an open and protected archaeological park with an underground archaeological museum, preserving the ancient graves in situ, and as a place of information and awareness for the visitors to the Ancient City of Nessebar.*

Located on a vast area of the mainland, west of the isthmus, the Necropolis of Mesambria-Mesembria represents an important component of the cultural heritage of Nessebar, which had not been studied by 1982 and therefore not given due attention in the preparation of the nomination of the Ancient City of Nessebar. Until 2007, when large-scale archaeological investigations were initiated in connection with investment plans, the discovery of graves was incidental, and investigations were sporadic, in small sections. The lack before 2015 of certain conservation regimes led to the realization of inappropriate constructions in the buffer zone of the property on the mainland, including in the area of the Necropolis of Mesambria-Mesembria. Currently, part of the Necropolis falls within the World Heritage Site's buffer zone. By Order No. P/D9P-16 of 20.08.2024 the Minister of Culture granted the status of the site “Necropolis of Messambria-Mesembria”, Nessebar Municipality, Burgas District, with the classification of a single immovable archaeological cultural property with the category of “national significance” and defined

boundaries and regulations for the protection of the property and its buffer zone. With its unveiling, the adjacent mainland territory manifests new facets of its historical and cultural significance, reinforcing the impact of the Outstanding Universal Value of the Ancient City of Nessebar and supporting its meaningful and visual connection to the mainland.

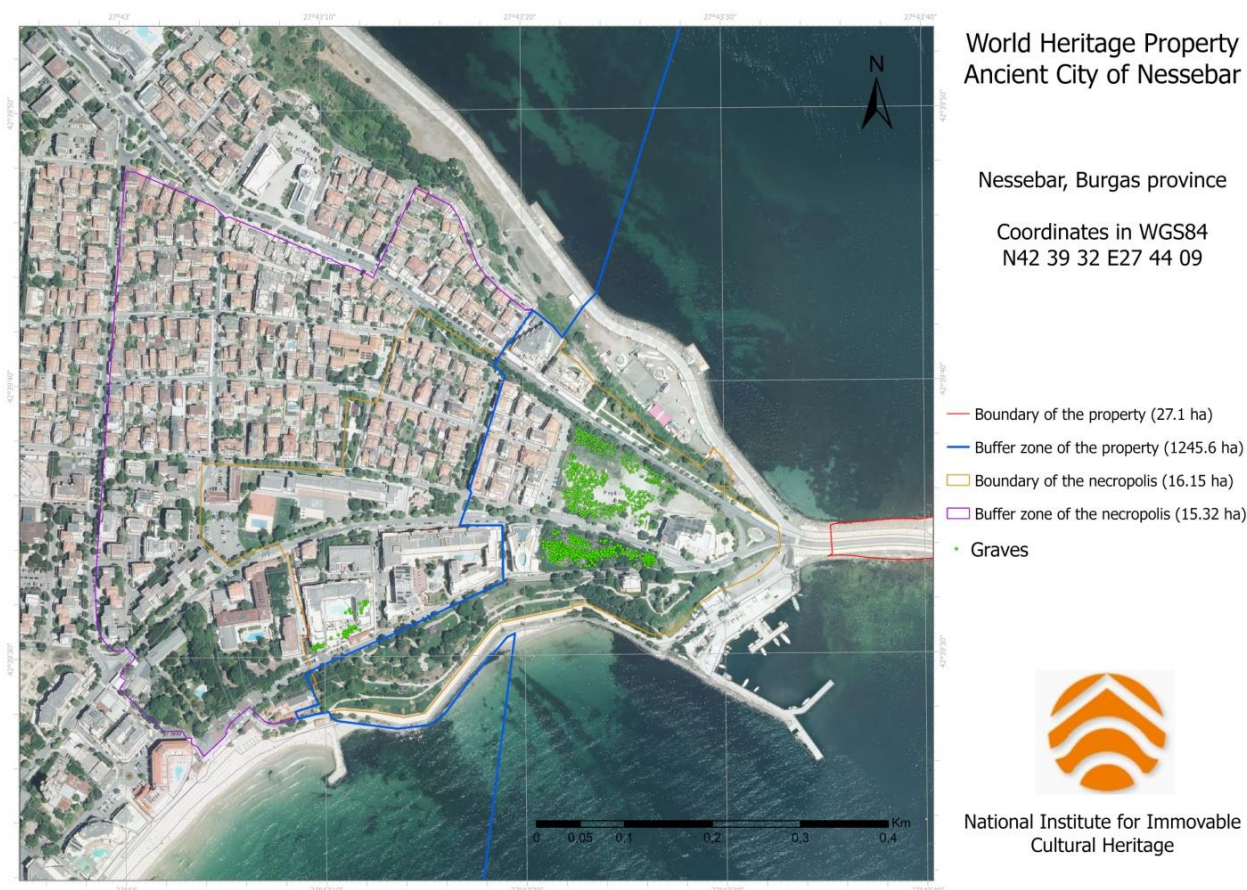
With the protection regimes for the Ancient City of Nessebar adopted at the national level in 2015, in order to ensure a higher degree of protection of the property, a small modification of its buffer zone on the mainland was determined by including in it the entire territory of the seaside park, which by the above-mentioned order is also included in the boundaries of the Necropolis. In view of the importance of the Necropolis of Mesambria-Messebar and the recommendations of the 2023 mission, the Bulgarian side is preparing a nomination dossier for a minor modification of the mainland buffer zone of the Ancient City of Nessebar to include the entire territory of the Necropolis, which will be submitted to the World Heritage Committee for consideration.

*“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.” (from Reactive Monitoring Mission Report 2023).*



**Fig.22: Boundaries and buffer zone of the Ancient City of Nessebar and the Necropolis of Mesambria-Mesembria; Source: NIICH**





**Fig.21: Boundaries the Necropolis of Mesambria-Mesembria and buffer zone; Orthophoto-plan;**  
**Source: NIICH**

In the *Heritage Impact Assessment for New Development in the Ancient Necropolis Of Messambria* submitted by the Municipality of Nessebar for two land plots on the territory of the Necropolis, as well as by the opinion of the archaeologists-explorers of the site, the following recommendations were made:

#### ***Recommendations in the Impact Assessment:***

- Change of the volumetric and spatial composition of the new development, including a reduction in the building footprint and a change in roof coverage to landscaped terraced roofs;
- Creation of a park in the undeveloped part of the site in order to overcome the negative impact of developments in the area around the Necropolis;
- Changing the approach to the conservation and display of the cist burial structures located below the level of the adjacent street, and the construction of an underground archaeological museum as an extension of the existing one;
- Construction of a Tourist Information Centre.

#### ***Recommendations from the archaeological surveyors and the Impact Assessment:***



- Undertaking urgent conservation measures for the over 30 stone graves/cists found on site (backfilled to date).
- The rich and numerous findings from the necropolises will find a leading place in the exposition of the new extension of the museum. A part of the underwater heritage of Nessebar could also be presented with the inclusion of virtual realities, augmented realities, images of graffiti of vessels found in the churches of Nessebar.



*Fig. 23: Excavations of the Necropolis of Mesembria-Messambria; Source: NIICH archive and Bozhkova, A. et al (2010) <sup>6</sup>*

### Implementation to date:

Taking into account the recommendations of the mission report and the Impact Assessment team, as well as the status of the Necropolis as an archaeological ICP of national importance, the Municipality of Nessebar is in the process of reorganizing the investment programme, exploring the possibility of exposing the cist grave structures and building an extension to the archaeological museum, as well as finding another site for the construction of a primary school and a sports hall.

The most valuable finds from the Necropolis of Mesembria - Mesembria are included in the funds of the Museum "Ancient Nessebar" <sup>7</sup>. After the implementation of a project for conservation and restoration of the windmill on the isthmus, in 2023 the exhibition *"The riches of the Ancient Necropolis of Mesambria"* organized by the museum was presented there.

<sup>6</sup> Ibid.

<sup>7</sup> Photos of artifacts from the Necropolis of Mesambria-Mesembria; Source: official page of the Museum "Ancient Nessebar" [https://www.ancient-nessebar.com/html/main\\_en.php](https://www.ancient-nessebar.com/html/main_en.php)



*Fig.24:Artefacts from the Necropolis of Messesembria-Messambria; Source: "AncientNessebar" museum*

- *Develop efficient measures to encourage and support private owners of buildings in the maintenance and conservation/restoration of their buildings and Supporting the restoration of houses, including the possibility of providing direct financial support or tax relief*

Owners of immovable cultural property, including private individuals, may apply for financial support for activities that are directly aimed at or support the protection, conservation and restoration of immovable cultural property under the Ministry of Culture's annual programme “Preservation of Immoveable Cultural Heritage” with funding from the state budget through the Ministry's budget. The funded activities include the preparation of conservation and restoration projects and their implementation. In spite of this possibility, at the moment, individuals - owners of buildings of vernacular architecture in the Ancient City of Nessebar have not applied for such funding.

According to the Ordinance of the Municipal Council of Nessebar Municipality on Determination of the Amount of Local Taxes, established to the Local Taxes and Fees Act, the buildings - immovable cultural property, when they are not used for economic purposes; museums, galleries, libraries, as well as community centers are exempted from real estate tax.

- *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.*

On 5 June 2023, a meeting of the High-level Inter-Institutional Commission and its Expert Working Group was held to review the comments, conclusions and recommendations of the World Heritage Centre/ICOMOS Joint Reactive Monitoring Mission to the Ancient City of Nessebar, held in the period 16-20 January 2023, and to discuss the “Cultural Heritage Strategy for the Nessebar Municipality 2023-2032” prepared on behalf of the Municipality of Nessebar and

to take a decision regarding the method of commissioning the Conservation and Management Plan for the “Ancient City of Nessebar”.

In 2024, numerous meetings of the High-level Inter-Institutional Commission and its Expert Working Group were held with representatives from the relevant agencies, focusing on the future of the Ancient City of Nessebar and its ICP,

- On 06 February and 20 May, 2024, meetings of the High-level Inter-Institutional Commission were held to follow up on the implementation of the main requirements for the Republic of Bulgaria of the Decision 45 COM 7B.179 of the World Heritage Committee of Riad - 2023, follow-up actions and upcoming tasks.
- Meetings of the Expert Working Group of the High-level Inter-Institutional Commission appointed by Order No. ПД9К-154/17.05.2024 were held successively on May 20, May 30, June 6, and June 14, 2024 to discuss the draft Vision for the Future of the Ancient City of Nessebar and its ICPs and Road Map. The results of the joint work of the Expert Group - the Vision for the Ancient City of Nessebar and the Roadmap, together with their annexes, updated according to the requirements of the World Heritage Committee and the Advisory Bodies to UNESCO, expressed at the meeting on 28 June 2024, were presented at the meeting on 08 October 2024. The next steps and stages of work for the CMP were discussed.
- In 2024, the “Shared Vision for the Ancient City of Nessebar (2025-2044)” developed by the Expert Working Group of the High-level Inter-Institutional Commission was discussed at a meeting of the Inter-Institutional Commission.

- *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 ; Strengthen the financial resources and staffing of the national institutions concerned in order to ensure that management can effectively conserve the Outstanding Universal Value of the property;*

Recommendations related to the need to strengthen the expert capacity and financial resources in the conservation activities of the Ancient City of Nessebar have been made by previous missions. By Decree No. 242 of 4 July 2024 of the Council of Ministers, the staff of the Inspectorate for the Preservation of Cultural Heritage at the Ministry of Culture was increased by 22 inspectors and those of the Department of Immovable Cultural Heritage of the Cultural Heritage, Museums and Fine Arts Directorate by 4 experts.

The same decree also increased by 17 the number of experts of the National Institute for Immovable Cultural Heritage, which carries out searches, studies and specialised documentation of cultural heritage sites; prepares assessments and proposals for declaring, granting the status of immovable cultural property and defining the regimes for its conservation; maintains a public register of immovable cultural property and maintains a national documentary archive fund; prepares drafts conservation and management plans, expert opinions, planning documents and other documents.



In 2024, the expert staff of the Centre for Underwater Archaeology at the Ministry of Culture was increased by 12 people. Increasing the number of inspectors and experts involved in cultural heritage protection activities at national level is of utmost importance. This also supports the development of conservation and management plans for immovable cultural property of global and national importance (e.g. the Conservation and Management Plan for the Ancient City of Nessebar).

In 2023 and 2024, on the basis of competitive sessions under the programmes of the Ministry of Culture for the conservation of immovable cultural heritage, for field archaeological studies and for projects in the field of movable cultural heritage, museums and art galleries, projects for emergency conservation and restoration works for the Church of "St. Michael and Gabriel" (church of the Archangels) and for the Church of "Pantocrator" (St. Nicholas) were funded for the Ancient city of Nessebar; Conducting regular field archaeological investigations and field conservation at the site of "Sunken Fortification Port Structures in Mesembria", city of Nessebar; Project "Renovation of the information system "Audio Guide" in the Museum "Ancient Nessebar"; Study, research and documentation of the "St. Stephan" Church - The New Metropolis". The committee is set to consider two more projects of the "Ancient Nessebar" Museum for the preservation of movable cultural properties in the museum's collections and exposition, ensuring a suitable microclimate in the churches of "St. Stephan" and "St. John the Baptist", and for the production of advertising materials and flyers for the museum's sites and for the promotion of the cultural heritage of the Ancient City of Nessebar.

Under Priority 1 of the Cultural Heritage Strategy of the Nessebar Municipality "Sustainable Development of Cultural Heritage", Objective 1.1 "Social Inclusion" and Strategy Performance Indicator "Initiatives carried out, including trainings and public lectures" from 08 to 10.11.2023, a thematic training on the project "Revitalised spaces in the WH property Ancient City of Nessebar - Ethnographic Museum" was conducted for 10 employees from the management and expert staff of the beneficiary, in the field of cultural heritage. In the framework of the project BGCULTURE-1.001-0003-C01 "Revitalised Spaces in the World Cultural Property Ancient City of Nessebar - Ethnographic Museum", a scientific and practical conference was held in March 2024 under the title "Museology of the 21<sup>st</sup> Century". The project is funded under the EEA Financial Mechanism's Cultural Entrepreneurship, Heritage and Cooperation Programme 2014-2021. The aim is to present the achieved results, to discuss among a specialized audience the challenges of museum work in the present, to put the new museology in a broader context, to use cultural heritage as a catalyst for local development, a field for interaction and a driver of the digitalization process. These initiatives are also in line with the 2018 mission recommendation: *„to consider carrying out interpretation planning to build on the successes already achieved by the Ancient Nessebar Museum team. The relatively new discipline of heritage interpretation can ensure a systematic approach to communicating heritage values while also supporting conservation and visitor management issues”*

## IIa. ON DECISION 45 COM 8B.70 OF THE WORLD HERITAGE COMMITTEE

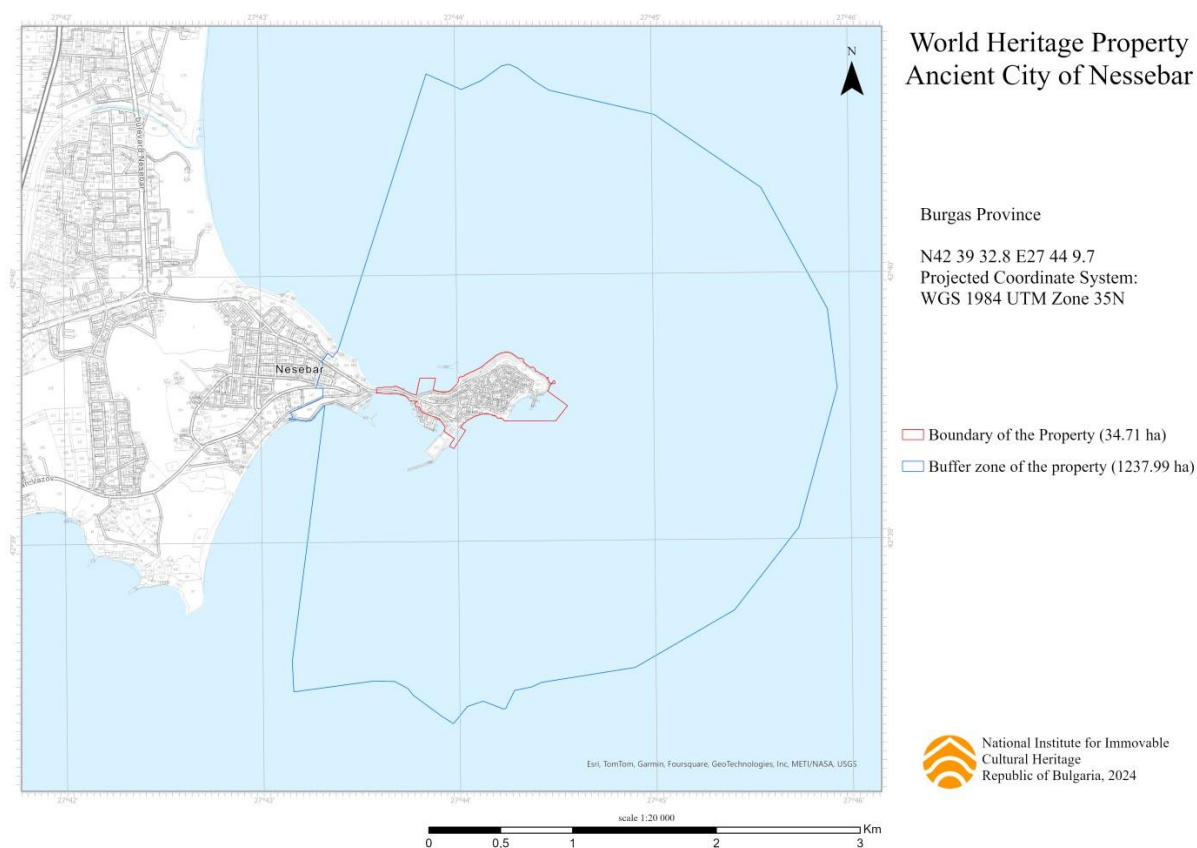
The underwater cultural heritage in the water area of the Ancient City of Nessebar has been assessed by advisory and reactive monitoring missions as an integral part of the WH Property and an important attribute of its Outstanding Universal Value. Following underwater archaeological investigations carried out over the last eight years by the Centre for Underwater Archaeology (CUA), the World Heritage Committee's Decision 45 COM 8B.70 at its Extended 45<sup>th</sup> Session adopted the Bulgarian proposal for a minor boundary modification of the World Heritage property to include part of the water area around the peninsula, which is saturated with archaeological structures from past eras.



**Fig. 26..Map of the boundary of the World Heritage Property Ancient City of Nessebar: Source: NIICH (2024)**

In November 2023, by order of the Minister of Culture, the conservation regime for the World Heritage Property was updated with new boundaries and prescriptions for the conservation of the water area. This change contributes to a more effective conservation of the Ancient City of Nessebar and of the cultural properties discovered under water, to the manifestation of their high cultural, historical, scientific and expositional value, degree of preservation and potential for socialisation, as well as to the enrichment of knowledge about the historical layers in the development of Nessebar as *“an outstanding testimony of multi-layered cultural and historical heritage. It is a place where many civilisations left their tangible traces”* (Criterion iii).





**Fig. 25. Map of the boundaries of the World Heritage Property Ancient City of Nessebar and the Buffer Zone; Source: National Institute for Immovable Cultural Heritage (2024)**

### **Recommendations from Decision 45 COM 8B.70 of the World Heritage Committee and the missions carried out related to the underwater cultural heritage of Nessebar:**

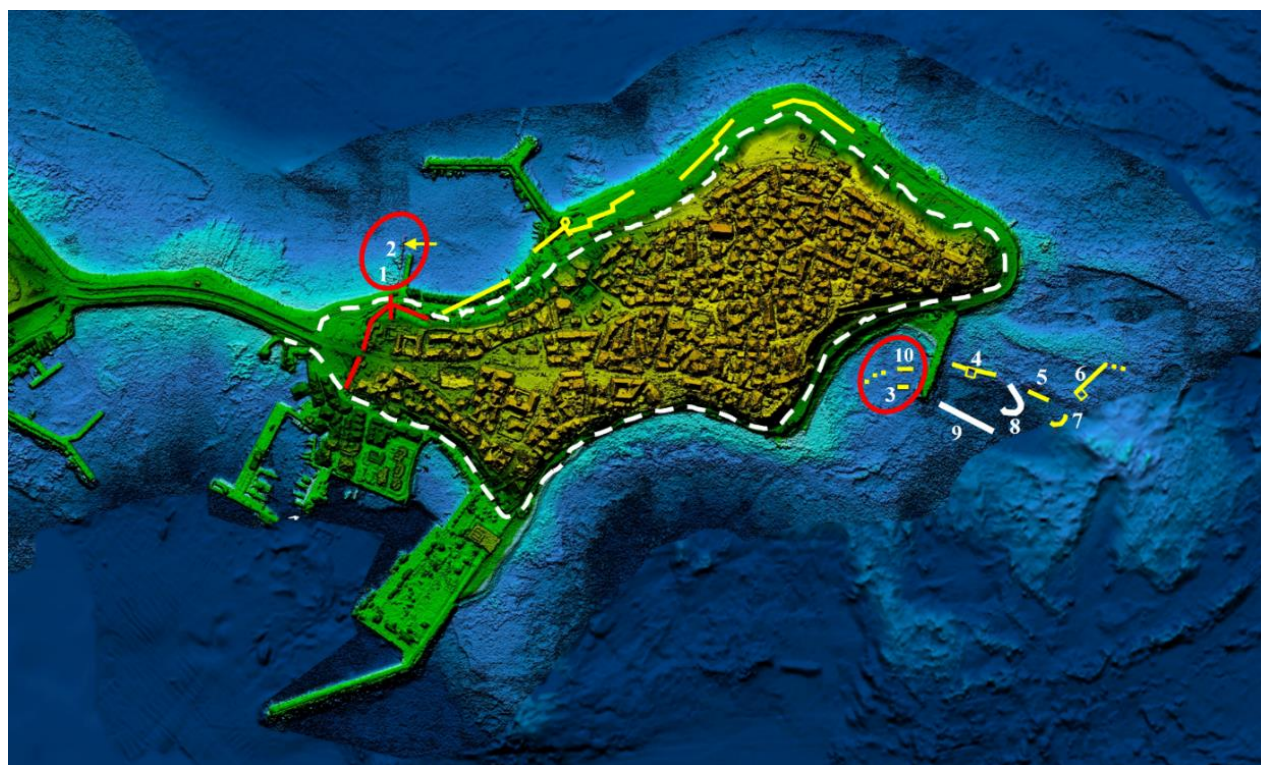
- *Completing the Conservation and Management Plan for the Ancient City of Nessebar, and considering the underwater archaeological vestiges in all areas of management and planning by making provisions for specific regimes for conservation, management, sustainable development, and monitoring of this heritage,*

Work is underway on the preparation of the Conservation and Management Plan for the Ancient City of Nessebar (2025-2044) and it is expected that the draft will be ready by the end of March 2025. The Shared Vision for the development of the Ancient City of Nessebar, prepared in 2024 with a horizon of 2025-2044, defines a Strategic Framework with priority areas, strategic and specific objectives, measures and activities for the implementation of the objectives, which will be enshrined in the Conservation and Management Plan. The underwater cultural heritage is fully addressed in Priority Area 3: “Research, conservation and interpretation of underwater cultural heritage. Capacity building”. The strategic and specific objectives take into account all the recommendations of the World Heritage Committee Decision 45 COM 8B.70, as well as the advisory and reactive monitoring missions relevant to this heritage area. As Specific Objective 3.2.4, the recommendation to take underwater cultural heritage into account in all areas of management and planning is reflected, making specific provisions for conservation, management,

socialisation, sustainable development and monitoring. The Cultural Heritage Act as well as the Ordinance on Conservation and Management Plans make provision for the need to develop and implement CMP in conjunction with the provisions of the integrated development plans of the municipalities and the spatial plans for the territorial scope of the single or group immovable cultural property. With regard to conservation regimes, information is provided below.

- *Reinforce and expand the research programme for the underwater cultural heritage of the Ancient City of Nessebar, as an integral part of developing the national inventory of underwater cultural heritage,*

The CUA implements an annual “Programme for the study and promotion of the underwater cultural heritage of Nessebar”, which started in 2017 and continued in the following years, as well as in 2023 and 2024, with funding from the Ministry of Culture, the Balkan Heritage Foundation and the support of the Municipality of Nessebar. Four archaeological field campaigns were conducted in this period: two in early summer and two in autumn. The aim of the CUA was both to broaden the scope of the investigations and to examine specific archaeological sites in order to clarify their chronology and functions. The study sites are presented below.



*Фиг. 27: Digital terrain model of the Nessebar peninsula and its water area. The red circles show the study areas in 2023 and 2024. No. 1 and No. 2 indicate the sites to be explored in 2023, and No. 3 and No. 10 – in 2024; Source: CUA*

In 2023, archaeological excavations were conducted on the western side of the peninsula, northeast of the isthmus, on the western flank of the Argirova Buna jetty. This area was located northeast of the main town gate. An Early Byzantine wall (5<sup>th</sup>-6<sup>th</sup> century) made of stones and brick belts cemented with mortar, the foundations of which continue into the sea, is still preserved there and is marked on historical maps of the late 19<sup>th</sup> - early 20<sup>th</sup> century. It was in this area that Lyuba Ognenova's explorations began in the 1960s. The CUA has been exploring this site since



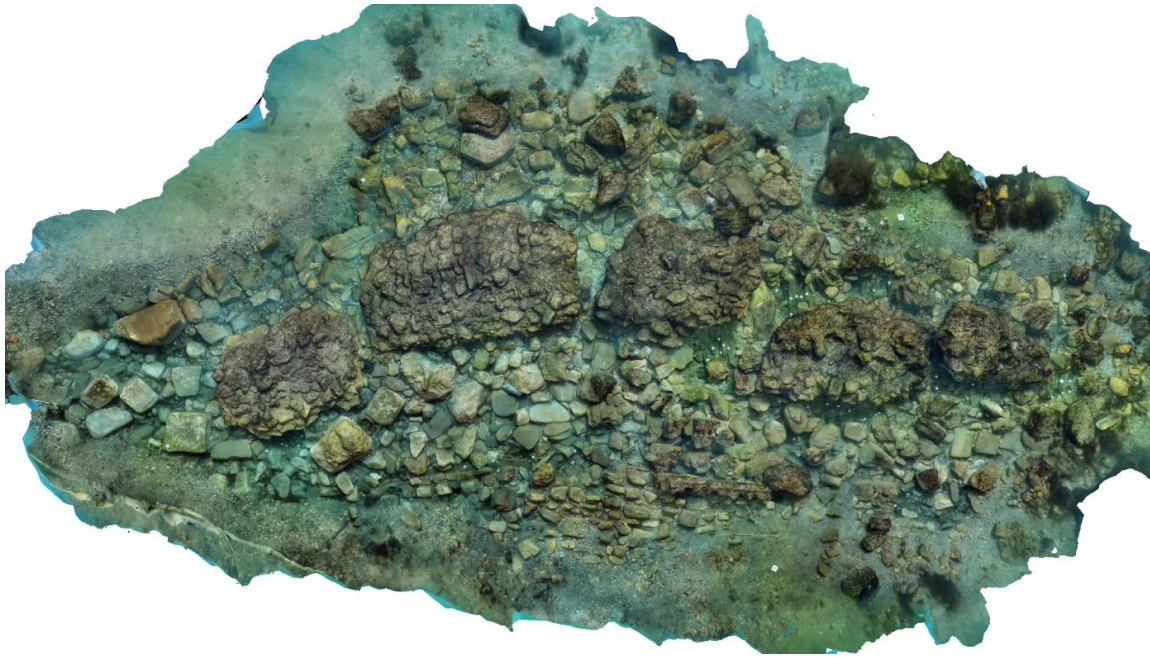
2017, but in 2023 important discoveries were made. The foundation and the end of the wall were uncovered, about 40 m from the modern shoreline and 2 m deep. It is 2.8 m thick. It ends without any continuation on the side, indicating that it had a purely defensive purpose and had no harbour functions, as has been suggested by some researchers. The traces of a large fire on the outer side are probably evidence of the conquest of the city by the Bulgarian ruler Krum in 812 and the destruction of the walls described in historical sources. The base of the wall is formed by wooden formwork made of planks and beams. These were sampled for carbon dating (14 C) and dendro analyses. Beneath the destructions of the Byzantine wall, an earlier archaeological site was discovered - a fortified wall of large blocks parallel to the Early Byzantine wall, probably built during the Late Classic or Hellenistic period (c. 5<sup>th</sup>-4<sup>th</sup> centuries BC), soon after the foundation of Mesambria. On top of the destruction of the two fortification walls, probably in the late medieval or Ottoman period, a linear structure was made of piled-up extremely large blocks, some weighing 1-2 tons. In all likelihood, all three structures had the same function, that of a diateichisma which prevented enemy troops from bypassing the city along the northern wall. The archaeological structures have been documented by photo and video recording. A high-resolution photogrammetric three-dimensional model was produced.



**Fig. 28: A pre-Roman fortification wall of large blocks, excavated in 2024. It is 6 m long and about 1 m thick; Source: CUA**

In 2024, a survey was conducted on the southeast side of the peninsula, in the small bay south of South Buna jetty. There, in the 1970s, Lyuba Ognenova's expedition discovered the remains of an Early Byzantine wall, preserved in a section of about 20 m, at a depth of 2.2 m. The thickness is 2.6 m. It was built of stones cemented with mortar. The wall was investigated by archaeological excavations. At its base, a well-preserved pad of horizontally placed side-by-side beams was found, which served to distribute the weight of the wall evenly over the ground, protecting it from cracking. The clay terrain in which the foundation was made was reinforced with piles - pointed stakes.





*Fig. 97: Excavated area in 2024 (photogrammetric three-dimensional model and photomosaic). Five fragments of the Early Byzantine fortress wall are visible, with a total length of 18 m. The thickness of the wall is 2.6 m; Source: CUA*

The process of destruction of the wall has been clarified - collapse and cracking, probably related to earthquake activity and sea level rise and wave action. The level (depth) of the base of the wall is a very important indication of the sea level at the time of the construction of the wall in the 5<sup>th</sup> - 6<sup>th</sup> centuries AD, which was about 2,5 m below the modern level. The entire excavated area of about 100 sq m was documented by photo and video recording. A high-resolution photogrammetric three-dimensional model was produced. The beams and piles were sampled for carbon dating (14 C) and dendro analyses.



*Fig. 30: Investigation of the pre-Roman wall and the grid of beams under the wall; Source: CUA*

In the same area, to the north of the Early Byzantine wall, some 20 m away and 2.3m deep, the CUA investigated a preserved base of a Late Classical or Hellenistic-period wall. It is made of large blocks of regular shape. The wall is double-faced, 1.3 m thick and has a preserved length of 8 m. Only the first row of blocks is preserved. It was discovered in 2019 by the CUA, but was not excavated until now. In 2024 it was found that the stones were laid on a grid made of massive beams. Some had a cross section of 35 x 20 cm, they probably distributed the weight of the wall evenly over the ground, which protected it from cracking. The excavated area has been documented by photo and video recording. A high-resolution photogrammetric three-dimensional model was made. The beams were sampled for carbon dating (14 C) and dendro analyses.

In 2024 the CUA extended the scope of the survey by conducting a diving survey in one of the bays of the district of Ravda, southwest of the Nessebar peninsula. A large amount of ancient pottery was found, which is evidence that the bay was used as a harbour. We know from Ovid that Mesambria had more than one port. An important discovery in the bay of Ravda were three fragments of pottery dated to the Late Bronze Age. They are the first clear evidence of a Late Bronze Age settlement, as has been suggested by some researchers.

In 2023, samples of wood were sent for radiocarbon dating (14C) of beams found at the base of the remains of two walls discovered in the sea southeast of the peninsula, made of large rough blocks. The results showed that one wall, the so-called “Thracian Wall” by its discoverer Lyuba Ognenova, was not built by the Thracian inhabitants of the peninsula before the foundation of the Greek colony, but by the Doric settlers soon after their settlement during the Late Classic period. This is an important finding regarding early monumental fortress construction on the peninsula. The dating of the wall, the base of which now lies at a depth of 5.5 m, also gives an indication of the sea level during this period as well as local tectonic movements.

In 2023 and 2024, the annual International field school of Underwater Archaeology, organized by the CUA and the Balkan Heritage Foundation (BHF), with the support of Nessebar Municipality and accredited by New Bulgarian University, was realized.

The underwater cultural heritage and the results of the archaeological research were presented at a number of academic and diplomatic scientific and cultural events in Bulgaria and in different countries:

- The conference “Black Sea Crossings / Maritime Networks from Hellenistic to Byzantine Times” (30.11.-1.12.2023) in Istanbul;
- Side event during the 45th Session of the World Heritage Committee in Riyadh, Saudi Arabia, Riyadh (13.09.2023);
- Side event “Bulgarian Underwater Archaeology” during the 46th Session of the World Heritage Committee in New Delhi, India (25.08.2024), organized by CUA;
- Side event “Integrating Nature and Culture in Underwater Cultural Heritage” during the 46th Session of the World Heritage Committee in New Delhi, India (25.07.2024), organized by ICUCH;
- International Conference on Underwater Archaeology in Jeddah, Saudi Arabia (15.01.2024), organized by the Saudi Arabia National Commission;
- Two scientific conferences in the town of Ahtopol (18.05.2024 and 09.11.2024 );



- Seminar dedicated to the underwater cultural heritage of the city of Nessebar, organized by Veliko Tarnovo University.

In 2024, the underwater explorations and discoveries in Nessebar were presented in poster exhibitions in New Delhi, during the 46th Session of the World Heritage Committee, in the city of Varna and the town of Sozopol, Bulgaria. The exhibition in New Delhi was part of a site event dedicated to the Underwater Cultural Heritage of Bulgaria, and was organized in partnership with the Ministry of Culture, Center for Underwater Archaeology, and Municipality of Nessebar. It was held under the patronage of the National Commission of the Republic of Bulgaria for UNESCO.

The new discoveries add to the information on the extent of the submerged part of Messambria, the nature of the fortification system of the city, the change of the sea level and the paleolandscape, the adaptation of the local population. The project “Regular underwater archaeological survey of the site of the submerged fortifications and harbour structures of Messembria” is funded by the “Field Archaeological Research Programme” of the Ministry of Culture.

#### **ON THE FOLLOWING TWO RECOMMENDATIONS:**

- *Considering underwater cultural heritage values as part of heritage impact assessment of any new development along the coastline,*
- *Not undertaking any intervention on the seabed that may affect underwater archaeological vestiges and controlling navigation around the peninsula,*

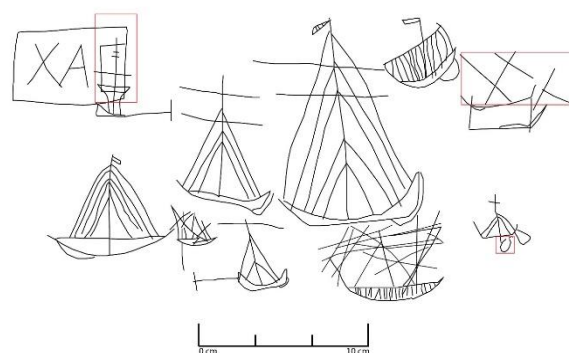
In the measures and activities foreseen for the implementation of the objectives of the Priority area “ Research, conservation and interpretation of underwater cultural heritage. Capacity building” is foreseen the activity “Preparation of Impact Assessments on the archaeological heritage underwater for any development initiative affecting the coastline of the Ancient City of Nessebar”. It is also required that the preparation of a plan for the rehabilitation of the coastal zone of the peninsula as part of the Detailed Development Plan of the Ancient City of Nessebar takes into account the adopted prescriptions for the conservation of the sea zones included within the boundaries of the property, for the prohibition of new construction, except for the construction of infrastructure related to the protection of archaeological immovable cultural property or for the minimum necessary provision of access. The prescriptions require that the implementation of permissible activities related to the disturbance of the integrity of the seabed shall be carried out in strict compliance with the requirements of the CUA and in coordination with the competent environmental authority - Ministry of Environment and Water / Regional Inspectorate for Environment and Water.

- *Launch a feasibility study on the underwater archaeological sites to explore how to make them accessible to the public through 'maritime archaeological routes' and other interpretation initiatives that could include, for instance, the maritime graffiti found in the Nessebar churches, providing new perspectives on the relationship between the Ancient City of Nessebar and its maritime landscape;*

**The program for documenting the graffiti in the churches of Nessebar, started in 2018, continues.** In 2023 and 2024, work continued on the processing of the large array (database) of documented graffiti and preparation for their publication in catalogues (corpus of graffiti from Nessebar). The results of the analysis and research, part of the PhD thesis of Dr. Zdravka Georgieva from CUA, have been published in articles in Bulgarian and English and presented in poster exhibitions and presentations at international events - New Delhi, India, Riyadh, Saudi Arabia, Istanbul, Turkey, Southampton, UK, Sozopol and Varna, Bulgaria.



*Fig.31. Graphic images of ships  
Dr. Zdravka Georgieva*



*Fig. 32: Graphic plan of ship images  
Dr. Zdravka Georgieva*

- *Establish a capacity-building programme in cooperation with UNESCO and its partners to improve the identification, evaluation, research and protection of the underwater cultural heritage in Bulgaria;*

The mission's 2017 recommendation to establish a capacity-building programme in collaboration with UNESCO and its partners with the organization of training is also being implemented. In 2024, CUA has applied to the UNESCO Participation Programme for 2024-2025 with the project *Preserving and Exploring Underwater Cultural Heritage - Capacity Building, Exchange, and Training in the Field of Underwater Archaeology*. The project has been approved for funding and will be implemented in 2025. It foresees training related to the exploration and conservation of underwater cultural heritage in Nessebar and Sozopol, as well as networking in the Balkans, the Black Sea and the Mediterranean region (North Africa).

In 2024, Bulgaria sent to UNESCO the application of the CUA for the status of "Category 2 Centre (C2C)" at UNESCO. A UNESCO feasibility study mission on Bulgaria's capacity to meet the upcoming commitments and make a decision is to be carried out as well as a STAB advisory mission to the 2001 Convention for the inclusion of the underwater heritage in the Conservation and Management Plan of the "Ancient City of Nessebar".

- *Developing 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.*

For the part of the sea zones included in the boundaries of the Ancient City of Nessebar the following prescriptions for conservation have been adopted (Order ПД9P-2 of 23.11.2023 of the Minister of Culture):

It is defined as an area for underwater archaeological research, conservation and socialization of architectural and archaeological structures. New construction is prohibited, except for the construction of infrastructure related to the protection of archaeological cultural property or for the minimum necessary provision of access.

For the newly annexed areas of the aquatic area of the WH property, the prescriptions for Zone B-1 (Order No. ПД9P-14 of 05.06.2015 of the Minister of Culture /SG No. 51 of 2015/) remain in force, with the following new prescriptions added:

Tourism, including underwater tourism, and the creation of archaeological underwater routes are allowed under strict compliance with the following conditions:

- Projects for the creation of underwater archaeological routes or other forms of socialization shall be coordinated with the Ministry of Culture, after a positive opinion from the Centre for Underwater Archaeology and after coordination with the competent environmental authority of the Ministry of Environment and Water / Regional Environment and Water Inspectorate - Burgas.
- The implementation of the agreed and approved projects is supervised by the Centre for Underwater Archaeology.
- The maintenance, marking, cleaning, labeling of the already agreed and approved routes shall be carried out under the methodological guidance and control of the Centre for Underwater Archaeology, according to the prescriptions and at the expense of the investors, after coordination with the competent environmental authority of the Ministry of Environment and Water / Regional Inspectorate for Environment and Water.
- The guides on the agreed routes are allowed to carry out the activity after training and instruction by the Centre for Underwater Archaeology.

The recommendations of the World Heritage Committee decision to include in the CMP provisions for the underwater heritage have been taken into account in the objectives and measures of the Strategic Map in the Vision for the Ancient City of Nessebar and will be included in the development of the plan.

- *On the recommendation of Decision 45 COM 8B.70 and the missions conducted: “A long-term plan to relocate the Nessebar Port Terminal .... facilities outside of the peninsula should be explored and pursued.”*

Throughout the history of Messambria/Mesembria/Nessebar, the port function is central to the maritime settlement and is mentioned in many ancient written sources. A large number of anchors, pottery and other artefacts have been found in the sea off the peninsula, proving active seafaring

and port activities from the foundation of the most ancient settlement until today. *“In the second half of the 2nd mill. BC, two harbour zones at the Nessebar peninsula were functioning, what have been clarified archaeologically. The first of these was to the north of the peninsula and is attested by the 23 stone anchors discovered... The second harbour was on the south leeward side of the peninsula... Mesemvria is present in all medieval portolanes and is regularly shown in red on 14th-15th century nautical charts, in recognition of its place and importance as a major port and trading centre.”*<sup>8</sup> The harbour with the Marine Station (built in the 1960s), which is located within the World Heritage Site's buffer zone, is a bearer of this traditional function, having been an integral part of the urban fabric and landscape both before and during the inscription of the Ancient City of Nessebar on the World Heritage List in 1983.

The Directorate “Maritime Administration - Burgas” of 2023, objects the above recommendation and asks why the existence of the port terminal, which was in operation before and during the inclusion of Ancient Nessebar in the World Heritage List in the same form and parameters, is now unacceptable. It is noted that historic sites, linked in their millennia-long history to the sea, have port facilities as they have always had them. The opinion also notes that the Port Terminal Nessebar has been granted a concession for a period of 35 years as of 08.09.2014. The concessionaire complies with the conservation prescriptions for the territory of the terminal set out in Order No. PD9P-14/ 05.06.2015 of the Minister of Culture: to be used as a port terminal - part of a port for public transport, port facilities, public works and landscaping, public parking and public and information services; in case of proven technical and operational necessity, the reconstruction of the building of the Marine Station is allowed, while maintaining the volumetric and spatial parameters of the existing construction; construction of infrastructure networks and facilities is permitted solely for the needs of the port, while preserving the existing woody vegetation. Prescriptions for the water area around the peninsula are also defined.

Considering these facts, as well as the status of the Port Terminal - Nessebar, part of the Port of Burgas for public transport, we find that the proposal to relocate the port terminal outside the peninsula is not applicable.

***The objectives, measures and activities defined in the prepared Shared Vision for the Ancient City of Nessebar 2025-2044 include the recommendations of reactive monitoring missions and advisory missions conducted on the territory of World Heritage site, such as:***

- Ensuring increased participation of the local community in decision making for the development, conservation and management of the property in partnership with all relevant institutions, the municipality and others;
- Establishing mechanisms for training, knowledge exchange and consultation among cultural heritage stakeholders and developing a platform for cooperation to share ideas, experiences and good practices at national and international level;
- Development of mechanisms and conditions for financial and technical support for specialized conservation and restoration activities, including for owners of buildings of vernacular architecture;

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<sup>8</sup> *Journal of Archaeology*, vol. 1/ 1989, pp. 6-15; Kalin Porozhanov, “Dating of the stone anchors with holes from the Bulgarian Black Sea coast - achievements and problems”.



- Development and implementation of a programme for economic support and stimulation of the occupation of Renaissance buildings representing the local lifestyle and culture on the territory of the Ancient City of Nessebar;
- Development and implementation of a programme for emergency, maintenance and preventive conservation of immovable cultural property, including technology, implementation methodology and budget.
- Development and implementation of a programme for systematic archaeological research on land and under water with a sustainable funding mechanism for archaeological and accompanying conservation activities and for the protection of the discovered cultural property;
- Regular provision of earmarked funds from the Ministry of Culture for systematic monitoring by the NIICH;
- Conduct annual monitoring of the condition of the geofencing and revetment structures on the slopes of the peninsula;
- On the basis of the development plans developed in the General Spatial Plan of the municipality and the Detailed Development Plan of the Ancient City of Nessebar and its buffer zone, preparation of: a plan for the restoration of the historic urban landscape and the coastal zone of the peninsula in order to manifest its rich cultural stratification, defining its identity and diversity; a plan for the rehabilitation of the coastline of the mainland within the buffer zone of the property, in order to prevent possible negative impacts on the landscape;
- Consistent implementation of the policy for the removal of illegal constructions and reconstructions that do not comply with the prescriptions for the preservation of the Ancient City of Nessebar and its buffer zone, with priority in the immediate environment and visual corridors to the medieval churches;
- Strengthening the partnership between tour operators, experts and guides specialized in the field of cultural heritage, in order to increase their capacity and promote the interest of tourists and visitors of the Ancient City of Nessebar and other immovable cultural property on the territory of the municipality to the richness and diversity of this heritage, etc.

The decisions of the World Heritage Committee and the recommendations of the missions are taken into account in the elaboration of the Conservation and Management Plan of the Ancient City of Nessebar.

**10. Requests the State Party to submit to the World Heritage Centre, for review by the Advisory Bodies, the Conservation and Management Plan, including the heritage under water, Detailed Development Plan and the General Development Master Plan, and by 1 December 2024, an updated report on the state of conservation of the property, for examination by the World Heritage Committee at its 47th session, considering that the urgent conservation needs of this property require a broad mobilization to preserve its Outstanding Universal Value, including the possible inscription on the List of World Heritage in Danger.**

The Conservation and Management Plan for the Ancient City of Nessebar will be submitted to the World Heritage Centre at the end of March 2025 in accordance with item 5 of Decision 45 COM 7B.179 of the World Heritage Committee.

***IV. In conformity with Paragraph 172 of the Operational Guidelines and in accordance with the recommendation of the reactive monitoring mission in 2023: “exploze 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” we provide the following information***

Hotel Menabria building<sup>9</sup>, 1 Lyuben Karavelov Str, (RLP VIII-639, quadrant 54), city of Nessebar is located in the “new part of the city”, within the buffer zone of the Ancient City of Nessebar and within the boundaries of an archaeological immovable cultural property with the category “national significance?” Necropolis of Mesambria-Mesembria. The construction started in 2005, when there were no prescriptions adopted for the buffer zone and the necropolis had not been explored (except for accidentally discovered graves) and had no defined territorial scope. Therefore, including on the territory of the necropolis, a large number of buildings with volumetric and architectural characteristics irrelevant to the world heritage site have been erected. In 2015, prescriptions for the buffer zone of the World Heritage site on the mainland were adopted, and in 2024, conservation regimes were established for the Necropolis of Mesambria-Mesembria.

In 2003 and 2005. NIIC /now NIICH/ refused to approve the design visa and the project for the construction of the hotel, requesting the release of the volume of the windmill, at that time a monument of local cultural importance, in order to optimize its exposure, reduce the floor area of the planned construction in the areas of direct visibility with the isthmus and the world heritage site, as well as to ensure visual contact of the monument with the isthmus and the Ancient Nessebar. Following a further submission of a project for the site, in December 2005 NICM requested that a full archaeological survey of the area to be developed be carried out, with the design documentation being in accordance with the results of the survey and the requirements of the Institute's previous letters. In the meantime (08.12.2005) the Chief Architect of Nessebar Municipality issued a Building Permit and started excavation works on the site without informing the “Ancient Nessebar” Museum. The museum took the matter into its own hands and started an archaeological excavation without being able to complete it due to the resumption of construction works. The construction did not take into account the requirements of the institute to release the volume of the mill and reduce the floor height. The mill was largely built into the hotel building, it was judged to have largely lost its heritage value because of this, and due to the impossibility of exhibiting and displaying it in its surroundings, it was de-listed as a monument in 2007.

In 2010, the Directorate for National Building Control (DNBC) issued a permit for use, which in practice legalized the construction. In the same year, the Ministry of Culture refused to coordinate a sketch with a visa for the preparation of a Complex investment project – draft Detailed Development Plan – Development Plan and an investment project for the reconstruction and extension of an existing building - the hotel “Menabria”. Following a court case concerning the building permit issued by the Chief Architect, to which NICM (now NIIPC) is a party, which started before 2007 and lasted for several years, by a Decree of April 2011, the Regional Prosecutor's Office of Burgas terminated the criminal proceedings concerning the issuance of the building permit for the Menabria

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<sup>9</sup> The owners of the hotel have changed several times, which is why the hotel in the annals has different names (Windmill; Menabria; Mill)

Hotel Complex and the building was thus recognized as legally constructed. After the ruling of the Regional Prosecutor's Office of Burgas, the NIICH and the Ministry of Culture have practically no working legal mechanisms to protect the mill.

In April 2021, the Regional Inspectorate for the Preservation of Cultural Heritage, with a report of findings, identified construction work on the hotel building. The RDNBC -Burgas also issued a Detective Report, on the basis of which an Order was issued to stop the construction works, as well as a Penal Decree. By letter of March 2022 of the Head of the RDNBC-Burgas, the continuation of the construction work was allowed *"...after the provision of investment projects coordinated with the Ministry of Culture under the CHA or after the submission of a valid building permit and coordination of investment projects with the Ministry of Culture under the terms and conditions of the CHA"*. At present, the hotel building has an extremely unsightly appearance, it is an unfinished timber frame with metal scaffolding and a tin fence, partly without window frames and with a visible concrete structure.

In view of this requirement of the RDNBC -Burgas, in March 2022, the Ministry of Culture submitted project documentation, with an opinion of NIICH dated 11.05.2022, which proposes the Minister of Culture to coordinate the design visa, volumetric and investment project for reconstruction, remodeling and major repairs - volume reduction, re-facade and pitched roof with terraced setbacks for the hotel building. The project documentation was examined at a meeting of the Specialized Expert Council for the Conservation of Immovable Cultural Properties (SECCICP), whose decision was to propose to the Minister of Culture to issue a negative opinion, stating reasons and requirements, including:

- upon subsequent submission of project documentation, the approved projects by the Nessebar Municipality, on the basis of which the construction was carried out and a construction permit was issued, must be presented;
- if the investment projects approved in accordance with the SPA are not available in the archives of Nessebar Municipality or the owner, they shall be restored in accordance with Art. 145, para. 5 of the SPA and submitted to the Ministry of Culture and the NIICH.

In accordance with these decisions of the SECCICP and in order to fully clarify the procedures carried out over time, the Ministry of Culture has requested the owner of the property, the RDNCC - Burgas and the Municipality of Nessebar to submit additional materials. Upon receipt of these, they were sent to the NIICH for a further opinion. In the response of NIICH, it was again proposed that the Minister of Culture should agree with the design visa, the volumetric and planning study and the investment project. At the moment, the hotel building has an extremely unsightly appearance, it is an unfinished construction with metal scaffolding and a sheet metal fence, partially without window frames and a visible concrete structure.



*Fig. 33: Hotel building - November 2024; Source.NIICH*

Prior to issuing an opinion on the 2022 project documentation, supplemented in 2023, in response to the recommendation of the November 2023 reactive monitoring mission, the Ministry of Culture has launched an initiative to acquire for the state the property in RLP VIII-639, quadrant 54, in the city of Nessebar, 1 Lyuben Karavelov Str. According to Art. 43, para. 1 and Art. 43a of the State Property Act, the State may acquire property by purchase, whereby a decision of the Council of Ministers shall instruct a minister, head of another department or a regional governor to conclude a contract for the purchase of a property after fulfilling a number of requirements, including the submission of a proposal by the owner of the property for its sale with a proposed price for the sale. By Letter No. CT-84-417 12/21/2023, the Ministry of Culture sends a request to BHR LTD., the owner of the property, regarding its intentions to sell and purchase from the State the real estate owned by it on mutually satisfactory terms and in compliance with the Bulgarian legislation in force, expressing readiness to hold a meeting with the manager of the company to discuss the intentions and find a solution that would be in favor of the cultural heritage of Bulgaria and its citizens and respecting the right to private property. In a letter dated January 2024, the manager of BHR LTD. declared clearly and definitely that he does not consider any possibility of selling to the state his own real estate - a building (with hotel use) and a land plot in RLP VIII-639 for a hotel, restaurant and disco, quadrant 54 according to the plan of the city of Nessebar, 1"Lyuben Karavelov Street.

In relation to the above, as per the recommendation under item 9 of the Report of the WHC/ICOMOS Joint Reactive Monitoring Mission to the Ancient City of Nessebar (January 2023), it has been clarified that there are no other legally regulated options for the State to acquire the property - owned by a legal entity.



After establishing the impossibility of the acquisition of the property by the state and taking into account the reiterated positive opinion of NIICH with a proposal to the Minister of Culture to coordinate the project documentation, the experts from the Ministry of Culture carried out a detailed analysis of the submitted in 2022 design visa, volumetric and investment project, supplemented with certified copies of documents and studies on spatial plans, investment projects, construction works, procedural and ascertainment actions, new design visa and technical investment project from July 2023 (supplement) for reconstruction, redevelopment and major renovation of the existing four-story hotel building. It has been ascertained that the project provides for the reduction of the built-up area and the built-up volume, reduction of the height of the building, freeing of the space around and above the mill built into the site in order to ensure its exposure, dismantling of part of the fourth floor in the north-east corner of the building, compliance with the prescriptions for the conservation of the buffer area of the Ancient City of Nessebar and of the archaeological immovable cultural property Necropolis of Mesambria-Mesembria.

On the basis of the above, the Ministry of Culture (*Annex 6*), in its opinion No. CT-84-417 dated 29.01.2024, has agreed on a design visa, a volumetric and structural study and an investment project for the for reconstruction, redevelopment and major renovation - volume reduction, re-facing and pitched roof with terraced setbacks, of the existing hotel building with requirements related to the possible discovery of archaeological finds in the process of subsequent construction works. The Chief Architect of Nessebar Municipality issued building permit No. 170/ 10.07.2024 for the project.

## IN CONCLUSION

The Bulgarian State Party is aware of the issues it has to solve for the preservation of the Ancient City of Nessebar and assures that it will continue to make efforts to preserve the attributes of the Outstanding Universal Value of the Ancient City of Nessebar and work actively on the implementation of the decisions of the World Heritage Committee as well as the recommendations of reactive monitoring missions, advisory missions and those conducted in 2024 online consultations in connection with the preparation of the Vision for the Ancient City of Nessebar and the Conservation and Management plan of the World Heritage site.

## V. Public access to the State of Conservation Report

The State Party is consents to the full State of Conservation Report to be uploaded to the World Heritage Centre's State of Conservation Information System. (<http://whc.unesco.org/en/soc>)

29.11.2024 r.

**X** Nayden Todorov

NAYDEN TODOROV

Minister of culture

Signed by: Nayden Vladislavov Todorov

**Signature:**

## ANNEXES

### ANNEX 1:

- *Resolution of the Municipal Council –Nessebar for preparation of a new General Development Plan of Nessebar Municipality and adoption of a new ToR;*
- *ToR for the General Development Master Plan of Nessebar Municipality;*
- *Letter No. ST-84-771/20.11.2024 from the Ministry of Culture for approval of the ToR for the General Development Plan of Nessebar Municipality with recommendations*

### ANNEX 2:

- *Information in tabular form on building permits issued for the period 2011-2024 (separate file - excel table);*

### ANNEX 3:

- *Projects submitted to the Ministry of Culture for approval and opinion;*

### ANNEX 4:

- *Information on removed illegal constructions (2010-2022). For 2023-2024 the information is in the text of the report;*

### ANNEX 5:

- *Report of the GDOCN for inspections and acceptance commissions carried out on the territory of the Ancient City of Nessebar and in its buffer zone;*

### ANNEX 6:

- *Opinion No. ST-84-417 dated 29.01.2024 of the Ministry of Culture (for the hotel with the built-in mill)*

## ANNEX 1:

### *Resolution of the Municipal Council –Nessebar for preparation of a new General Development Master Plan of Nessebar Municipality and adoption of a new ToR;*

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#### MUNICIPAL COUNCIL – NESSEBAR

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8230 Nessebar, 10 Edelvays Str., tel./fax: 0554/2 93 40, E-mail:  
[osnesebar@nesebar.bg](mailto:osnesebar@nesebar.bg)

**COPY-EXTRACT  
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No. 5/19.02.2024**

**Under item ELEVEN of the agenda** - Report-proposal Ref No. 102/12.02.2024 by Nikolay Dimitrov - Mayor of Nessebar Municipality, regarding taking action to bring the GSP /TSP/ of Nessebar Municipality in line with the requirements of Articles 10, 11, 12 and 21 of the Act on the Black sea coast spatial development (ABSCSD), on the basis of Art. 124, para. 1 of the ABSCSD in connection with § 4 of the Transitional and Final Provisions of the ABSCSD.

The Municipal Council, with 19 votes “in favor” out of 19 municipal councilors who voted, adopted the following:

#### **DECISION No. 89**

Municipal Council - Nessebar, taking into account that the procedure for approving the GSP of the Municipality of Nessebar, initiated on the basis of Decision No. 789 of Minutes No. 24 of the meeting of the Municipal Council - Nessebar, held on 26.01.2007, cannot be continued and finalized due to the termination of the procedure for the environmental assessment of the GSP by letter No. 8-II/2021 of the Minister of Environment and Water, which is an obstacle to fulfilling the imperative requirements of § 4 of the Transitional and Final Provisions of the ABSCSD, as well as the fact that the task for developing the GSP of the Municipality of Nessebar, approved in 2007, does not currently adequately reflect all changes in the factual situation /in the ownership, permanent purpose and method of permanent use of the territories within the scope of the GSP/ and in the regulatory framework and on the basis of its powers under Art. 124, paragraphs 1 and 3 in conjunction with Art. 125 of the SPA and in connection with §4 of the Transitional and Final Provisions of the ABSCSD, the Municipal Council - Nessebar decided:

Gives consent to the development and processing of a draft general spatial plan for the Municipality of Nessebar.

Accepts the submitted Terms of Reference for the GSP of the Municipality of Nessebar, prepared in accordance with the requirements of Art. 125 of the SPA, together with the attached graphic part - Reference Plan of the Municipality of Nessebar - type of territories by ownership and type of territories by permanent purpose in scale 1:25,000.

Assigns the municipal administration to take action to develop, process and approve a draft General Spatial Plan of the Municipality of Nessebar. After preparing the draft GSP, it shall be submitted for consideration by the Municipal Council.

On the basis of Art. 124b, para. 4 of the SPA, the decision is not subject to appeal.

**CHAIRPERSON OF THE MUNICIPAL COUNCIL – NESSEBAR: V. KRASTEV**

*Signed-ill.*

*True to the original*

*Round seal: MUNICIPAL COUNCIL NESSEBAR, CHAIRPERSON*

*Rectangular seal: MUNICIPAL COUNCIL, TRU TO THE ORIGINAL*

*Rectangular seal: MUNICIPAL COUNCIL NESSEBAR, ENTERED INTO FORCE*

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## ***ToR for the General Development Master Plan of Nessebar Municipality;***



### **DESIGN ASSIGNMENT FOR GENERAL SPATIAL PLAN OF THE MUNICIPALITY OF NESSEBAR UNDER ARTICLE 125 OF THE SPA**

September 2024

#### **GENERAL**

The draft General Spatial Plan of the Municipality of Nessebar shall be developed on the basis of the present Design Assignment in accordance with Art. 125 para. 1 of the Spatial Planning Act. It shall justify the need for its preparation by addressing the following factors:

- The significant changes that have occurred in the socio-economic and spatial planning conditions under which the Territorial Spatial Plan (TSP) of the Municipality of Nessebar, approved in 1998, was prepared, related to the commercialization of tourism and the ongoing changes in the forms of ownership and the organization of economic activities. The current TSP of Nessebar Municipality was developed with a forecast horizon of 2020 and a population at the end of the period of 26,000 inhabitants. According to the data from the office of the GRAO to the Nessebar municipality as of 08.09.2023, the population of the municipality is 30721 inhabitants, i.e. the forecast is exhausted as a result of the rapid development and increased investment activity.
- The new needs arising from the implementation of the sites - owned by the state, the municipality or the operating companies, in order to meet the new needs;
- The opportunities created by the current legislation for the implementation of investment initiatives to be implemented with funds provided through public-private partnerships;
- Changes in the regulatory framework related to its alignment with European legislation.

The recreational beach potential for sea tourism is almost completely exhausted and the number of beds planned by the current plan has already been exceeded in some parts of the territory. The overdevelopment is a fact which shows that the 1998 TSP does not help to provide adequate solutions in these conditions and cannot guarantee the spatial planning process due to the high investor pressure and the implementation of an inconsistent policy for sustainable tourism development in the municipality and the Republic of Bulgaria. It is necessary to implement new policies and spatial planning measures at local and national level for the development of new forms of alternative tourism in the quiet settlements of the municipality, which have still preserved their authenticity.



The following planning and strategy documents and their updates should also be used in the study process:

- National Strategy for Sustainable Tourism Development in the Republic of Bulgaria;
- Regional Development Strategy of Burgas Region;
- Municipal Development Plan of Nessebar Municipality;
- Programme for sustainable development of tourism in Nessebar municipality;
- Environmental Protection Programme of Nessebar Municipality;
- Energy Efficiency Programme of Nessebar Municipality;
- Municipal programme to promote the use of renewable energy and biofuels.

The draft GSPM should be developed with a planning horizon of 2040 with intermediate forecast periods 2024-2030, 2030-2035, 2035-2040. These periods are used in the EU and national practice in the preparation of planning and strategic documents arising from the Regional Development Act. The same law specifies that municipal plans shall be prepared and updated on the basis of or in parallel with the spatial plans of the respective territorial communities.

In this regard, all information gathered during the research process should be presented in the explanatory note for use in other spatial and regional development and planning projects.

The textual and graphic materials of the Draft GSP of Nessebar Municipality should be prepared in accordance with the requirements of the Design Assignment and Ordinance No. 8 of the Ministry of Regional Development and Public Works for the scope and content of the spatial plans and schemes, as follows:

1. Reference plan type of territories by ownership in scale 1:25000;
2. Reference plan type of territories by permanent use in scale 1:25000;
3. Reference plan type of territory by type of permanent use in scale 1:25000;
4. Draft GSP of Nessebar Municipality in scale 1:25000;
5. Project “Coastal zone” in scale 1:10000;
6. Specialized schemes in scale 1:50000:
  - 6.1. Transport scheme;
  - 6.2. Water supply scheme;
  - 6.3. Drainage scheme;
  - 6.4. Energy system scheme;
  - 6.5. Scheme water area, archaeology and protected areas;

An integral part of the plan are “Rules and regulations for the application of the general spatial plan of the municipality of Nessebar”.

### **AIMS AND OBJECTIVES OF THE GSPM PROJECT**

To ensure sustainable development and integrated management of the territory in the long term while achieving optimal parameters of the main functional systems.

The GSPM should create the spatial conditions to ensure a balance between the needs of areas for work, habitation and recreation, the protection of the coast and equivalent attention to the sea and land, the sustainable use of coastal resources and dynamic development in accordance with environmental protection.

On the basis of the Design Assignment and of the current legal and regulatory framework (the SPA, ABSCSP, CHA and Ordinance No. 8 on the scope and content of spatial plans), the General spatial plan of the municipality should reflect the requirements regulated by the text of Art.106 of the SPA regarding the determination of:

1. The structure of the area - subject of the plan and predominant use of its constituent parts, the location and boundaries of :
  - settlements and urban formations;
  - agricultural territories;
  - forest areas;
  - nature conservation areas;
  - areas for cultural and historical protection;
  - disturbed areas for restoration;
  - special, other or mixed use areas;
2. The general spatial planning regime of each of the territories under item 1 with the relevant rules and regulations for the development and management of the individual territories.
3. The location of the technical infrastructure networks and facilities on the territory of the municipality and their connections with the territories of the neighbouring municipalities and with the infrastructure networks, facilities and sites of national importance;
4. Territories of public state and public municipal property and the regime of their development;
5. The disaster-prone areas, defined according to the maps prepared under the ordinance under Art.6, para. 2 and the municipal plans under Art. 9, para. 1 of the Disaster Protection Act, as well as the necessary preventive measures and the way of planning and protection;
6. Territories for active implementation of landscape development measures and aesthetic design.

Taking into account the territorial belonging to the Black Sea coast within the meaning of Art. 3, item 1 of the ABSCSP, the GSP and the rules and regulations for its implementation, in addition to the above, in accordance with the text of Art. 21, para.1 of the same law should be determined:

- The territories for carrying out economic activity;
- Measures to protect the environment, biodiversity, natural resources and cultural properties;
- The territories and water areas with restrictive regimes of planning and construction (zones A and B), in accordance with the adopted changes by the Bill Amendments and Supplements of the ABSCSP (SG No. 16 of 23.02.2024) regarding the sea beaches for nature tourism, including the Irakli beach.
- The general regime for the use of water, forest, land and recreational resources according to the criteria set out in the Water Act, Forest Act, Agricultural Land Protection Act and by-laws.
- The maximum permissible recreational capacities of resort settlements and settlement formations, resorts, resort complexes, holiday villages and villa areas according to criteria determined by an ordinance of the Minister of Health, the Minister of Regional Development and Public Works, the Minister of Environment and Water and the Minister of Tourism;
- Measures required for coastal protection, conservation, restoration and enhancement of the aesthetic qualities of the areas, measures to protect and restore the character of the landscape and cultural properties;
- The areas and zones where new construction and the extension of the construction boundaries of the existing urban areas are not allowed;

- Zoning rules and regulations for the construction of existing and future urban areas;
- Urban, agricultural, forest and disturbed areas;
- The areas to be developed as waterfront parks and gardens;
- The specific requirements, rules and regulations for spatial and aquatic planning.

In accordance with the text of para. 2 of Art. 21 of the ABSCSP, the following should be reflected in the GSP:

1. The boundaries of the coastal beach, determined in accordance with Art. 6;
2. The boundaries of the zones under Art.10, 11 and 12, also in accordance with the adopted changes by the Bill Amendments and Supplements of the ABSCSP (SG No.16 of 23.02.2024) regarding the sea beaches for nature tourism, including the Irakli beach;
3. Areas of protected and recreational forests;
4. The territories of protected areas and protected zones;
5. The territories and sections of the water area with the status of cultural values;
6. The boundaries of the territories with a restrictive regime, subject to requirements related to the security and defence of the country, including the protection and control of the state border.

Thus, the listed requirements overlap partially or completely in the text of Art. 16 of Ordinance No. 8 on the scope and content of spatial plans. In addition to fulfilling the legally required goals and objectives of the plan, the plan should:

- demonstrate and defend the need to extend the settlement development boundaries;
- reflect the boundaries of the areas for development and conservation of the cultural and historical heritage of the city of Nessebar;
- survey and identify areas for the development of alternative tourism;
- limit recreational capacities;
- spatial development rules and regulations for the development of existing and future urban areas to be laid down;
- specific requirements, rules and norms for the spatial and aquatic development to be defined.
- specific requirements for the analysis and prognosis for the development of the Cultural - Historical Heritage should be set, as for the “Ancient City of Nessebar” - “Archaeological Reserve and Historical Settlement - Architectural - Construction and Urban Immovable Cultural Property of World and National Importance”, the same should be consistent with the conservation regimes set in the draft GSP of Ancient Nessebar.

The objectives thus defined should find concrete expression in the organization of the territorial and functional-spatial structure of the General Spatial Plan.

### **Territorial structure**

In connection with the new legal and regulatory framework (the SPA, ABSCSP, Ordinance No. 8 on the scope and content of spatial plans and Ordinance No. 7 on the Rules and Regulations for the Development of Individual Types of Territories and Development Zones (RRDITTDZ)) and the changes in land use, **the plan should revise the provisions of the current TSP with regard to the spatial planning regimes and functional use of:**

- The territories falling within the scope of the zones with special territorial - spatial protection - zone “A” and zone “B” according to the “Development of the Black Sea Coast Act” and the Bill Amendments and Supplements of the ABSCSP (SG No. 16 of 23.02.2024) in relation to the Irakli beach. In accordance with the ABSCSP, the spatial

planning zones shall be reflected and drawn on the plan in accordance with the requirements of the Law;

- The territories envisaged for inclusion in the scope of existing and new settlement formations, according to valid decisions of the Nessebar Municipal Council;
- Land plots or groups of land plots for which the legal procedures for changing their designation and removing them from forest or land funds have been carried out;
- Areas falling within the boundaries of protected areas of the ecological network “NATURA 2000”, designated under the Biodiversity Act;
- The recreational capacities of the resort settlements and settlement formations, resort complexes, holiday villages and villa areas.

### **Settlement network and urbanisation of the territory**

Based on the results of the overall concept assessment, explore the possibilities of:

- Removal from urbanized structures of inherent or legally restricted functions and activities and appropriate use of the vacated land;
- Confirmation or change of the status of some existing functional zones in the scope of the agglomeration Nessebar - Ravda - Sunny Beach - Sv. Vlas - Elenite, envisaged under the current plan;
- Reconsideration of the development regimes following the above-mentioned development of new types of tourism and recreation, change of the dominant economic activities and securing the relevant territorial structure;
- Ensuring a high level of satisfaction with the social service facilities, corresponding to the changed specificity of the Sunny Beach Resort Complex and in particular of the Sunny Beach West Resort Complex;
- Modernization and expansion of existing resort-wide service centers;
- Expanding green areas and linking them into a common green system.

### **Technical infrastructure.**

To update the plans for the development of the transport system and the engineering and technical provision of the municipality through :

- Reflection of the alternative alignments of the Black Sea Motorway and updating the alignment of the Burgas - Varna main road;
- Reflection of the alternative alignments from the studies of the National Railway Infrastructure Company for railway connection Burgas - Sunny Beach;
- Reflecting new and emerging ports and offshore facilities, stimulating marine and coastal research;
- Reflecting the coastal defence, coastal protection and geoprotection structures, as well as other structures or sies related to the tourist function of the coast and commercial fishing;
- Updating of electricity and water supply schemes and their alignment with built and planned urban structures;
- Updating the plans for the construction of wastewater treatment plants (WWTP) and municipal waste transfer stations.

## **STATE OF THE NATURAL ENVIRONMENT**

1. Natural - geographical and ecological characteristics.



- 1.1. Natural conditions and resources. Physico-geographical characteristics and assessment of natural conditions and resources:
  - Relief - coastline, beach, dune formations, landslide activity, abrasive activity.
  - Geological conditions - soils and minerals.
  - Climatic conditions and resources - temperature regime, precipitation regime, wind regime.
  - Hydrological conditions and water resources - seawater, water resources / surface water sites, groundwater, mineral water.
  - Flora
  - Fauna
2. General environmental characteristics
  - 2.1. State of ambient air. The ambient air quality in the territory of the municipality of Nessebar is monitored by an automatic measuring station (AMS Nessebar), part of the national environmental monitoring system. The data from the station in Nessebar are to be used for the assessment of the current ambient air state.
  - 2.2. Noise pollution of the territory;
  - 2.3. Protected areas and zones and biodiversity;

### **Protected areas under the Protected Areas Act**

The spatial development of the territory of Nessebar Municipality shall be in accordance with the regimes of protection and use, designation and management of the different categories of protected areas, defined in the Protected Areas Act and the respective orders for their designation. Eight protected areas with the status of Protected Area (PA) and Natural Landmark (NL) have been declared on the territory of Nessebar Municipality.

In the draft GSP to reflect the current boundaries of protected areas, declared under Art. 35 of the Protected Areas Act:

| Protected area                                | A document to declare and define the regime of activities:   |
|---|--|
| PA Irakli                                     | Order No. RD-110 of 06.05.1994 (SG No. 42/1994);<br>Order No. RD-1267 of 02.12.2004 (SG 112/2004);<br>Order No. RD-141 of 18.02.2014 (SG No. 24/2014). |
| PA Kalinata                                   | Order No. 1938 of 03.07.1970 (SG No. 65/1970);<br>Order No. 871 of 07.11.1991 (SG No. 97/1991);<br>Order No. RD-1459 of 12.12.2003 (SG No. 6/2004).    |
| PA Ortoto                                     | Order No. RD-470 of 11.07.2001 (SG No. 73/2001);   |
| PA Sand Bank koketrays                        | Order No. RD-54 of 01.02.2001 (SG No. 16/2001);  |
| PA Smrikite-Natural habitat of red pyracantha | Order No. RD-420 of 14.11.1995 (SG No. 105/1995);  |
| NL Cape Emine                                 | Order No. 1187 of 19 April 1976 (SG No. 44/1976);  |
| NL Sand dunes - Babata-Sunny Beach area       | Order No 2109 of 20.12.1984 (SG No 3/1985);  |
| NL Sand dunes-5pcs.                           | Order No. 1187 of 19 April 1976 (State Gazette No. 44/1976);   |

### Protected areas under the Biodiversity Act

The protected areas declared under Art. 6 of the Biodiversity Act (BDA) are intended to protect or restore the favourable condition of the natural habitats included in them, as well as of the species in their natural range.

Due to the specific nature of the Black Sea coast, a significant part of the territory of Nessebar municipality falls within the following protected areas, declared under Art. 6 of the BDA:

| Protected area (PA)   | A document to declare and define the regime of activities:   |
|---|--|
| <b>Protected areas under Directive 92/43/EEC -</b><br>for the conservation of natural habitats and wild flora and fauna |  |
| BG0000574 Aheloy - Ravda - Nessebar   | Order No. RD-400 of 12.07.2016 (SG No. 58/2016);<br>Order No. RD-148 of 19.02.2014 (SG No. 15/2014);<br>Order No. RD-720 of 28.09.2023 (SG No. 83/2023). |
| BG0001040 Emine - Irakli  | Order No. RD-1038 of 17.12.2020 (SG 19/2021);<br>Decision No. 660 of 08.11.2013 (SG 97/2013);<br>Order No. RD-713 of 28.09.2023 (SG No. 83/2023).        |
| BG0000133 Kamchiyska and Emenska Mountains  | Order No. RD-992 of 10.12.2020 (SG 11/2021);<br>Order No. RD-707 of 28.09.2023 (SG No. 83/2023).   |
| BG0001501 Emona   | Order No. RD-1179 of 16.12.2022 (SG 103/2022)  |
| <b>Protected areas under Directive 2009/147/EC -</b><br>for the conservation of wild birds                              |  |
| BG0002043 Emine   | Order No. RD-560 of 21.08.2009 (SG 69/2009);<br>Order No. RD-76 of 28.01.2013 (SG No. 10/2013);<br>Order No. RD-721 of 28.09.2023 (SG No. 83/2023);      |
| BG0002044 Kamchiyska mountain   | Order No. RD-132 of 10.02.2012 (SG No. 23/2012);<br>Order No. RD-77 of 28.01.2013 (SG No. 10/2013);<br>Order No. RD-709 of 28.09.2023 (SG No. 83/2023);  |

The orders for the designation of the protected areas have designated :

- The object and purpose of conservation in the protected area;
- The total area and boundaries of the protected area;
- Prohibitions or restrictions on activities contrary to the conservation objectives of the protected area.

Specific and detailed conservation objectives are also set for the protected areas, which are approved by order of the Minister of Environment and Water.

The current boundaries of the protected areas declared under the Biodiversity Act should be reflected in the draft GSP. The spatial development of the territory of Nessebar Municipality shall be in accordance with the subject and objectives of conservation of protected areas, as well as with the regime of activities defined by the orders under Art. 12, para. 6 of the BDA.

In order to comply with the regimes for the conservation of protected areas under the Protected Areas Act (PAA), protected areas under the BDA and protected areas under the ABSCSP, the draft GSP should provide for :

- Spatial zoning, providing conditions for sustainable development of the municipality's territory and of the settlements and settlement formations, in compliance with the requirements of Art. 10, para. 10 and Art. 11, para. 3 of the ABSCSP. The territories of zone "A" and zone "B" falling within the protected areas shall retain their protection, use and management regimes established in accordance with the provisions of the PAA and of the BDA. In the case of spatial zoning, it is permissible to revise the existing spatial zoning plans for urbanised areas falling within such zones with a view to protecting their natural resources, in accordance with the requirements of Art.103a of the SPA;
- Spatial planning zones with reduced indicators and other spatial planning rules and requirements ensuring compliance with nature conservation regimes and the protection of environmental components in general;
- Introduction of preventive protection regimes for parts of the territory, with effect until the entry into force of management plans for protected areas;
- Protection of valuable forest areas and inclusion of parts of them in the green system of the municipality as green areas for wide public use;
- Provide green areas especially in the coastal area to preserve the spatial continuity of the natural environment, etc.

### 3. Landscape

The territory of the municipality has characteristic landscape types with a distinctly natural character. The preserved opportunities for natural development, which characterise most landscape types and express their resilience, are an indication that the territory needs mainly preventive (supportive) activities and actions in terms of preservation and enrichment of the main species. In view of this, the draft GSP should provide for :

- Consistent application of a landscape-planning approach aimed at the conservation and restoration of the overall landscape characteristics of the territory, especially their emblematic elements;
- In implementing the reclamation of disturbed sites and determining their future use, the belonging of these sites to the respective landscape types should be taken into account and their restoration should be used for their stabilization.

### 4. Assessment of territorial development potentials

- Recreational resources - areas and maximum recreational capacity of beaches by land forest parks, resort forests, natural water areas and artificial water bodies, water parks, sports and recreational grounds, golf courses, urban, suburban and other parks, nature and archaeological reserves.
- Land resources

- Forest - economic resources

In developing the GSP, emphasis should be placed on preventive measures to protect and preserve the environment and natural resources. Measures of this nature should focus on:

- Appropriate spatial planning solutions, with minimal encroachment on agricultural and forest areas, so as to preserve the natural wealth of the municipality;
- Protecting the suburban landscape by avoiding over-urbanisation, contrasting architectural styles and pollution;
- Improving the living environment and tourist attractions without damaging nature;
- Ensuring good quality and cleanliness of coastal sea waters and beaches in Nessebar Municipality;
- Expansion of the green areas and their connection into a common green system in order to fulfil their social and ecological functions: incl. Recreational (satisfy the needs of sport and recreation); aesthetic; bioclimatic (provide fresh air inflow from suburban areas, improve the microclimatic characteristics of the environment); ameliorative (redistribution of surface and ground water runoff); ecological - prevent the migration of pollutants from urban activities and transport, absorb some of the harmful gases and dust.
- Building the necessary infrastructure for environmentally sound waste management;
- Updating the plans for the construction of water supply networks and wastewater treatment plants (WWTPs);
- Provision for reclamation of identified disturbed land;

### **SETTLEMENT NETWORK**

1. General characteristics of the settlement network and non-settled urbanized territories.
2. Hierarchy and linkage of settlements. Types of categorizations and classifications:
  - By population;
  - By administrative status;
  - By territorial status;
  - Functional categorization;
3. Projections for the development of the settlement network and non-settled urbanized territories.

### **DEMOGRAPHIC DEVELOPMENT**

1. Demographic dynamics:
  - Natural population movement;
  - The mechanical movement of the population;
  - Economic employment;
2. Demographic development forecast.

### **ECONOMIC DEVELOPMENT**

1. General industry characteristics:
  - Economic tourism;
  - Agriculture;
  - Forestry;
  - Industry;
2. Development forecast.



## **OCCUPANCY AND HOUSING STOCK**

1. Level of housing satisfaction.
2. Characteristics of the housing stock.
3. Forecast of housing development.

## **SOCIAL ACTIVITIES AND SOCIAL INFRASTRUCTURE**

1. Survey of sector development:
  - Education;
  - Health and health infrastructure;
  - Culture;
2. Tourist infrastructure:
  - Spa tourism;
  - Event tourism (festivals, conferences, seminars, creative trips);
  - Wedding tourism;
  - Hunting tourism;
  - Eco tourism;
  - Rural tourism;
  - Sports tourism.
3. Forecast for the development of the infrastructure of social activities.

## **CULTURAL AND HISTORICAL HERITAGE**

1. Survey of the status of the CIH system :
  - list of registered ICPs on the territory of Nessebar municipality;
  - list of archaeological sites in the territory of Nessebar municipality;
  - list of the soldiers' monuments on the territory of Nessebar municipality;
2. Preparation of a prognosis for the development of the CIH system, and definition of the goals, objectives and methods for the development of the protected areas for the conservation of the immovable cultural heritage, linked to the conservation regimes in accordance with the norm of Art. 80, para. 1 of the CHA.
3. Implementation of the established regimes for the conservation of the group immovable cultural property “Ancient City of Nessebar” - “Archaeological reserve and historical settlement - architectural - construction and urban immovable cultural property of global and national importance”, as well as the regimes set out in the ToR of “Ancient City of Nessebar”;
4. Reflection of the territorial scope of the immovable cultural property Ancient City of Nessebar together with the buffer zones of the mainland, peninsula and the water area, in accordance with the norm of Art. 79, para. 3 of the CHA;
5. Reflection of the territorial scope of the single and group immovable cultural properties available in the municipality of Nessebar, and the protected areas for the preservation of immovable cultural heritage formed from their boundaries and buffer zones in accordance with the norm of Art. 79, para. 6 of the CHA;
6. Prescriptions and measures for the conservation and management of the “Ancient City of Nessebar” - “Archaeological Reserve and Historical Settlement - Architectural - Construction and Urban Immovable Cultural Property of World and National Importance”.

7. Prescriptions and measures for the conservation and management of the single and group immovable cultural properties in the municipality of Nessebar and the protected areas for the preservation of the immovable cultural heritage formed from their boundaries and buffer zones.

The project in the section “Cultural Heritage” should be prepared in the scope and content according to the methodological guidelines of the NIICH.

### **TRANSPORT - COMMUNICATION SYSTEM**

1. Analysis of the state of the communication system :
  - Road network - characteristics and classification;
  - Street network;
  - Public transport;
  - Road transport;
  - Water transport;
  - Air transport;
  - Rail transport.
2. Development guidelines and measures for the transport network.

### **ENGINEERING - TECHNICAL INFRASTRUCTURE**

1. Water supply and sanitation.
2. Electricity supply.
3. Waste generation by types and sources.

### **SPATIAL PLANNING CONCEPT**

The General Spatial Plan of Nessebar Municipality shall be developed on the basis of the approved Cadastral Maps of the lands of Nessebar, Sveti Vlas, Obzor, Ravda, Kosharitsa, Tankovo, Emona, Orizare, Gyulyovtsa, Banya, Koznitsa, Priseltsi, Panitsovo and Rakovskovo and all the provided specialized maps, data from NSI, Nessebar Municipality, Regional Administration - Burgas, State Hunting Farm - Nessebar, BTC, Bulgarian Post, Ministry of Environment and Water, Ministry of Culture, RIA, EVN, Water and Sewerage Company - Burgas, National Institute for Real and Cultural Heritage and others.

On the basis of a complex territorial and socio-economic analysis of Nessebar Municipality, it should propose the guidelines for spatial development, measures and events for the implementation of the plan, taking into account that the priority for the future development of Nessebar Municipality will be tourism.

The capacity of the tourist presence should be consistent with the spatial capacity of the ***recreational capacity of the coastal area***, not just the beach capacity used in the preparation of the 1997 TSP. In this way, a greater degree of dispersal and redirection of tourist flow will be achieved and a wider range of tourism product will be developed, regaining the function of the settlements and providing recreational areas for residents and visitors of the municipality.

Provision should be made to restrict future expansion of the urbanised areas at the foot of the Stara Planina between the village of Kosharitsa, and the town of St. Vlas /Settlement formation “Cholakova Cheshma” and Settlement formation “Intsaraki”/ at the expense of new dispersed urbanized areas in the lands of the village of Emona, village of Banya and the town of Obzor near the sea coast with provision of green wedges and forests without the possibility of building, as the envisaged spatial indicators are much lower than the permissible ones.

The project is to provide for the removal of all non-specific activities outside the two-kilometer zone, the construction of sports and attractive centers, the establishment of areas for

the construction of tourist farms, the expansion of existing villa areas and the establishment of new ones - around the Poroy dam and in Plazovets, Morsko and Velikovo /designated villages/.

The project should reflect the boundaries of:

- **the protection zones “A” and “B”** of the Black Sea coast under the ABSCSP;
- **zone “A”** under the ABSCSP for the water area and the regime for the protection of the group immovable cultural property “The Ancient City of Nessebar” - “Archaeological Reserve and Historical Settlement - Architectural - Structural and Urban Immovable Cultural Property of World and National Importance”, approved by Order No. ПД-9П-14 of 05.06.2015 of the Minister of Culture.

In accordance with the restrictions imposed by the above-mentioned buffer zones, the same should regulate:

1. Settlement network development forecast.
2. Spatial structure - zones and core of development.
3. Development guidelines and limiters.

The draft decision should contain:

- Provisions for new urban areas by zones and lands.
- Planned recreational capacity of the coastal zone by land area.
- Zoning parameters and maximum permissible demographic load of the territory by land.
- Coastal and waterfront use requirements.

### **TEXT AND GRAPHIC DEVELOPMENTS**

The textual and graphic materials of the Draft GSP of Nessebar Municipality should be prepared in accordance with the requirements of the Design Assignment and Regulation No. 8 of the Ministry of Regional Development and Public Work for the scope and content of the spatial plans and schemes, as follows:

1. Reference plan type of territories by ownership in scale 1:25000;
2. Reference plan type of territories by permanent use in scale 1:25000;
3. Reference plan type of territories by type of permanent use in scale 1:25000;
4. Draft GSP of Nessebar Municipality in scale 1:25000;
5. Project “Coastal zone” in scale 1:10000;
6. Specialized schemes in scale 1:50000:
  - 6.1. Transport scheme;
  - 6.2. Water supply scheme;
  - 6.3. Drainage scheme;
  - 6.4. .Energy system scheme;
  - 6.5. Scheme water area, archaeology and protected areas;

An integral part of the plan are “Rules and regulations for the application of the general spatial plan of the municipality of Nessebar”.

They should limit spatial zones and separate sites in existing and future urban areas:

- residential development zones;
- spatial zones for public service activities;
- resort and recreation spatial zones;
- spatial zones for summer recreation;
- spatial zones for holiday villages;
- spatial zones for alternative tourism;

- spatial zones and separate landscaping areas;
- spatial zones for sports and attractions;
- areas for the protection of cultural and historical heritage
- protected areas with management plans (PA, NL, etc.)
- industrial development zones;
- sites for technical infrastructure;
- sites for transport and port infrastructure, and to establish additional regimes with preventive spatial protection.

The project shall provide for:

- Restrictions on development of agricultural and forestry lands not provided for in the plan;
- Limit procedures for amending this plan to change the use of forest land;
- Prohibition of procedures to amend this plan in order to change the designation of the agricultural and forestry land falling within the zone “A” and zone “B” under the ABSCSP;
- Prohibition of procedures for amending the present plan in order to change the designation for the agricultural land, provided for by the plan for “buffer” zones, west of the boundary of zone “B” in the lands of the city of Nessebar, village of Ravda, village of Kosharitsa, which does not provide for the connection of the existing and newly introduced urbanized areas;
- Prohibition of procedures to amend this plan to change the use of forest land in protected areas;
- Measures for preventive spatial protection in the presence of immovable monuments of cultural and historical heritage.

## **SCOPE AND CONTENT OF THE ECOLOGICAL ASSESSMENT REPORT OF THE DRAFT GENERAL SPATIAL PLAN OF THE MUNICIPALITY OF NESSEBAR**

The General spatial Plans assigned under the SPA are subject to an environmental assessment procedure, and according to Art. 125, para. 7 of the SPA, the environmental assessment is part of the spatial plan. The environmental assessment is mandatory for plans and programmes in the field of spatial planning and land use, when these plans outline the framework for the future development of investment proposals under Annexes 1 and 2 of the Environmental Protection Act.

In accordance with the requirements of the Environmental Protection Act (EPA) and the Biodiversity Act (BDA), the development of the General Spatial Plan of Nessebar Municipality should be carried out procedures on Environmental Assessment, as well as on Compatibility Assessment (CA) of the plan with the subject and objectives of conservation of the protected areas of the ecological network NATURA 2000.

The Environmental Assessment (EA) of plans and programmes is a preventive tool for assessing the potential significant environmental impacts resulting from their implementation at national, regional and local level, which are in the process of being prepared. An environmental assessment shall take into account the objectives, spatial scope and level of detail of plans and programmes in order to identify, describe and adequately assess the possible impacts of the implementation of the investment proposals that these plans and programmes involve.

The compatibility assessment (CA) of plans and programmes with the subject and objectives of conservation of protected areas, in turn, aims to ensure that the implementation of



the envisaged investment proposals is permissible in relation to the regime of activities in protected areas, defined by their designation orders, and that there will be no significant and adverse impacts on the specific sites subject to conservation.

The EA and CA procedures are carried out in compliance with the regulatory requirements set out in the Ordinance on the Conditions and Procedure for Environmental Assessment of Plans and Programmes (the EA Ordinance) and the Ordinance on the Conditions and Procedure for Assessment of the Compatibility of Plans, Programmes, Projects and Investment Proposals with the Subject and Objectives of Conservation of Protected Areas (the CA Ordinance).

The procedure for carrying out the Environmental Assessment is carried out in the following sequence, according to Art. 3, para. 1 of the EA Ordinance:

- Notification of the competent authority (MoEW/RIEW) for the determination of the applicable EA procedure;
- Assessing the need for the EA;
- Defining the scope and content of the EA;
- Preparation of an EA report;
- Consultation with the public, interested bodies and third parties likely to be affected by the plan or programme;
- Reflection on the results of the consultation on the EA report;
- Issuing an EA opinion;
- Monitoring and control of the implementation of the plan.

For the assessment of the necessity of the CA, a notification under Art. 10, para. 1 of the CA Ordinance shall be prepared, to which the required annexes shall be submitted in a format that allows determining the location of the provisions of the plan in relation to the protected areas of the NATURA 2000 network.

If the competent authority considers that an Environmental Assessment and/or an assessment of the degree of impact on the protected areas is necessary for the GSP of Nessebar Municipality, it shall proceed to :

#### ***Definition of the scope and content of the EA***

To this end, a Terms of Reference for the content and scope of the environmental assessment and a Scheme for consultation with the public, interested bodies and third parties likely to be affected by the plan should be prepared. The scheme shall also include the arrangements for consultation under Art. 20 and public consultation under Art. 21 of the EA Ordinance. Consultations shall take place during the preparation of the environmental part, including on the terms of reference developed for the content and scope of the environmental part of the plan with the Competent Authority, the relevant specialised competent authorities under Art. 13, para. 1 (PHI) on the content and scope of the assessment of the environmental health and hygiene aspects and the risk to human health and other specialised authorities and the interested public, in accordance with the Consultation Scheme /Art. 19a of the EA Ordinance/. The competent environmental authority (MoEW/RIEW) shall be obligatorily consulted on the prepared scheme and Terms of Reference for the content and scope of the environmental assessment. The preliminary consultations will be carried out in accordance with Art. 19 and Art. 19a of the EA Ordinance.

#### ***Preparation of a compatibility assessment***

In case the competent authority has requested it, an Impact Assessment Report on the extent of the impact of the GSP on the protected areas will be prepared. The Impact Assessment

Report should contain at least the information referred to in Art. 23, para. 2 of the CA Ordinance, namely:

- Plan Annotation;
- A description of the characteristics of other plans, programmes and projects/investment proposals, existing and/or under development or approval, which in combination with the plan, programme and project/investment proposal under assessment may have an adverse impact on the protected areas;
- A description of the elements of the plan that, alone or in combination with other plans, programmes and projects/investment proposals, could have a significant impact on the protected areas or their elements;
- Description of protected areas, habitats, species and their conservation objectives and their reflection (consideration) in the preparation of the plan;
- Description and analysis of the extent of the impact of the plan on the subject and conservation objectives of the protected areas;
- Description and analysis of the impact of the plan on the types of natural habitats and species subject to conservation in the protected areas;
- Description and analysis of the impact of the plan on the integrity of the protected areas with regard to their structure, functions and conservation objectives (habitat loss, fragmentation, disturbance of species, disturbance of species composition, chemical, hydrological and geological changes, etc.) both during realization and when implementing the plan;
- Proposals for mitigation measures envisaged to prevent, reduce and possibly eliminate the adverse impacts of the implementation of the plan on the protected areas and determination of their degree of impact on the subject of conservation of the protected areas as a result of the implementation of the proposed mitigation measures;
- Consideration of alternative solutions and assessment of their impact on protected areas, including a zero alternative;
- A map showing the location of the plan sites in relation to the conservation areas and their features;
- Conclusion on the type and degree of negative impact according to the regulatory criteria;
- Presence of circumstances under Art. 33 of the BDA, including evidence for this and proposal for specific compensatory measures under Art. 34 of the BDA - when the conclusion under item 9 is that the subject of conservation of the respective protected area will be significantly damaged by the implementation of the plan, programme and project or by the implementation and operation of the investment proposal and that no other alternative solution is available;
- Information on the research methods used, including duration and period of field studies, methods for estimation and impact assessment, sources of information, difficulties in collecting the necessary information.

The prepared Impact Assessment Report shall be submitted to the competent authority for a quality assessment prior to the commencement of the consultation under Art. 20 of the EA Ordinance.

In case of a positive assessment of the Impact Assessment Report, the Contracting Authority shall carry out consultations in accordance with the EA Ordinance on the prepared EA report including the impact assessment report with the protected areas.

The results of the consultation shall be reflected in the EA report.

In accordance with Art. 34, para. 1 of the EA Ordinance, the assessment of the degree of impact on the protected areas shall be submitted as a separate annex to the EA report and shall form an integral part thereof.

### ***Preparation of an Environmental Assessment Report (EAR)***

The Environmental Assessment Report (EAR) should contain at least the information referred to in Art. 86, para. 3 of the EPA, in accordance with the level of detail of the draft GSP, taking into account and considering :

- The main objectives of the plan and the relationship with other relevant plans and programmes;
- Aspects of the current state of the environment and their possible development without the implementation of the GSP of the municipality, i.e. the so-called zero alternative will be considered;
- The environmental characteristics of the areas to be affected by the provisions of the GSP;
- Existing environmental issues identified at different levels relevant to the GSP, including those relating to areas of particular ecological importance, such as protected areas under the Biodiversity Act;
- The national and international environmental objectives relevant to the plan and how these objectives and any environmental considerations have been taken into account during the preparation of the GSP;
- Likely significant effects on the environment, including biodiversity, population, human health, fauna, flora, soils, water, air, climatic factors, physical assets, cultural and historical heritage, including architectural and archaeological heritage, landscape and the links between them. These impacts should include secondary, cumulative, concurrent, short, medium and long-term, permanent and temporary, positive and negative effects;
- Measures to overcome, mitigate and as fully as possible eliminate the adverse effects of the implementation of the GSP on the environment;
- A description of the rationale for selecting the alternatives considered and the methods of carrying out the environmental assessment, including the difficulties in gathering the necessary information, such as technical deficiencies and lack of know-how;
- A description of the necessary monitoring measures during the implementation of the plan.
- A non-technical summary in a language accessible to the public, not less than 10 % of the volume of the report, shall be prepared as a separate and self-contained annex to the EA report. In addition to the textual part, the summary shall contain the necessary visual material (maps, photographs, diagrams).

The EA report to be developed by a team with experts and a manager meeting the requirements of Art. 83 of the EPA and Art. 16 of the EA Ordinance. The experts who will carry out the environmental assessment will submit a personally completed declaration within the meaning of Art. 83, para.4 of the EPA, declaring that:

- Meet the requirements of Art. 83, para. 2 of the EPA;
- They are familiar with the requirements of the current Bulgarian and European environmental regulations and in their work on the assessments under Art. 81, para. 1 of the EPA they refer to and comply with these requirements and applicable methodological documents;
- They have no personal interest in the implementation of the GSP.

In preparing the EAR and Impact Assessment Report, it is necessary to comply with all instructions from the competent authority under the terms and conditions of the Ordinance on the Terms and Conditions for Environmental Assessment of Plans and Programmes, as well as with all relevant legislation in force.

Prepared by : .....

/Arch. B. Dimov - Chief  
Architect of Nessebar Municipality/

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***Letter No. ST-84-771/20.11.2024 from the Ministry of Culture for approval of the ToR for the General Development Master Plan of Nessebar Municipality with recommendations:***

classification of information:  
**level 1**

Outg. No. ST-84-771/20.11.2024

**MINISTRY OF CULTURE**

On the basis of Art. 84, para. 1 and para. 2, in conjunction with Art. 80 of the Cultural Heritage Act (CHA), in conjunction with Order No. ПД09-994/04.09.2024 of the Minister of Culture, Application to the National Institute for Immovable Cultural Heritage (NIICH) with registration No. 0800-4316/17.09.2024, Statement of the NIICH with reference No. 0800-4316/19.11.2024, file with the Ministry of Culture No. CT-84-771/20.11.2024, issued:

**STATEMENT**

**Subject: Assignment under Art. 125 of the SPA for the design of a General Spatial Plan (GSP) of the Municipality of Nessebar**

**Applicant:** Nikolay Dimitrov, Mayor of Nessebar Municipality, Burgas Region, city of Nessebar, 10 Edelvays Str.

**Identification data of the site:** Nessebar Municipality, Burgas Region

**Status of the sites on the territory of the municipality:**

According to the data from the National Register of Immovable Cultural Heritage, in which the acts of the authorities under Art. 65 of the Cultural Heritage Act are entered and from the Public Register of the declaratory acts issued under Art. 59, para. 1 of the CHA and of the acts for termination of the temporary regime under Art. 62, para. 1 of the same Act, which are maintained by the National Documentary Archive at the NIICH, a List of Immovable Cultural Heritage on the territory of the Municipality of Nessebar, Burgas Region has been prepared.

All settlement and tomb mounds and medieval defensive ramparts, declared by the Council of Ministers' Order No 1711 of 22 October 1962 as monuments of culture with the category "national importance", have the status of immovable cultural property (ICP) with the category "national importance" according to §10, para. 1 of the CHA.

All the commemorative signs erected on the occasion of Bulgaria's participation in the wars of 1885, 1912-1913, 1915-1918, 1944-1945, declared by letter No. 4349/04.12.1992 of the



NICM as historical monuments of culture, have the status of historical immovable cultural property according to §12, para. 1 of the CHA.

**Conservation regimes:**

By the protocol of the Inter-institutional commission of 8-12.10.1990, in implementation of the Order No. ПД -19-729/17.09.1990 of the Deputy Minister of Culture, and approved by the Deputy Minister of Culture (letter No. 4297/17.12.1990 of NICM) were defined “the boundaries of the buffer zone and the regimes for the use of the territory of the medieval monastery complexes in the areas of Cape “Emine” and “Kozluka” locality near the village of Sveti Vlas.

By letter No. 9100264/29.08.1995 of the Ministry of Culture the boundaries and buffer zones of the archaeological immovable cultural property with category “national significance” - “Stone defensive barrier wall (with fortification) from the Early Byzantine era” in the land of the town of Obzor and village of Priseltsi, “Fortress from the Early Byzantine era and the Bulgarian Middle Ages /Kozyak/” in the land of the town of Obzor and “Old Bulgarian earthen rampart “Germeto” in the lands of the village of. Priseltsi, village of Panitsovo and village of Rakovskovo.

By the minutes of the meeting of the Inter-institutional commission of 07.08.2012 in implementation of the Order No. ПД9К-157/31.07.2012 of the Minister of Culture and by the Minutes No. 33 of 29.10.2012 of the meeting of the SECPICP a proposal was made for granting the status and regimes of the archaeological immovable cultural property with category “national importance” - “Ancient necropolis of Mesambria”, city of Nessebar.

By Order No. ПД9-Р-14/05.06.2015 (State Gazette No. 51 of 2015) of the Minister of Culture the regimes /boundaries and prescriptions/ for the conservation of the group ICP of world and national importance “Ancient City of Nessebar” and its buffer zone have been defined.

By Order No. ПД9Р-2/23.11.2023 of the Minister of Culture, the conservation regimes (territorial scope and prescriptions for conservation) of the group immovable cultural property (GINP) “Archaeological Reserve and Historical Settlement - Architectural, Structural and Urban Immovable Cultural Property “Ancient City of Nessebar”, established by Order No. ПД9-Р-14/05 (State Gazette No. 51 of 2015), have been updated.

By Order No. ПД9Р-16/20.08.2024 of the Minister of Culture, the status and conservation regimes (territorial scope - boundaries, buffer zone and prescriptions for conservation) have been granted to the site “Necropolis of Messambria - Mesembria”, Nessebar Municipality, Burgas Region, with the classification of a single archaeological immovable cultural property, with the category “national importance”.

For the sites without adopted individual conservation regimes the provisions of Art. 79, para. 4 of the CHA, the protocols of the commissions under Art. 158a of the CHA and letter No. 545/27.02.2001 of NICM shall apply.

**Archive data:**

There are no previous statements on the GSPM Nessebar.

With the Statement No. 08-00-470/10.11.2022 of the Ministry of Culture, in connection with the Decision under item 1 of the Agenda of the Minutes, Reg. No. ИП-67/31.10.2022, approved by the Minister of Culture, of the meeting No. 100 of the SECPICP, held on 10.10.2022, the Terms of Reference for the elaboration of the Conservation and Management Plan (CMP) of the “Ancient City of Nessebar” was agreed.

With the Statement No. CT-84-276/30.04.2024 of the Ministry of Culture, in connection with the Decision under item 1 of the Agenda of the Minutes, Reg. No. ИП-30/17.04.2024, approved by the Minister of Culture, of the meeting No. 106 of the SECPICP, held on 21.03.2024, the Terms of Reference for the elaboration of the Conservation and Management Plan (CMP) of the “Ancient City of Nessebar” was agreed.

**Findings and assessments:**

The submitted documentation shall be subject to coordination in accordance with the provisions of Art. 80 of the Cultural Heritage Act (CHA).

Contents of text and graphic material submitted in total:

1. Letter of the Petitioner - Nessebar Municipality;
2. Electronic medium containing the terms of reference for the preparation of the General Spatial Plan of Nessebar Municipality
3. Text part;
4. Graphic materials:
  - “Reference plan” in scale 1:25 000;

On the text part of the project:

The submitted terms of reference has been prepared in accordance with the regulatory requirements for the preparation of the GSPM.

The terms of reference define the stages, scope, content, form and presentation of the project, which meet the regulatory requirements.

The cultural and historical heritage (CIH) of the territory of Nessebar Municipality is discussed in a separate section with requirements to the project.

There are requirements to the textual and graphic materials regarding the immovable cultural heritage, in accordance with the methodological guidelines for the preparation of the “CIH” part of the GSP.

The lists of immovable cultural property (ICP) on the territory of the Municipality of Nessebar are not attached to this documentation.

There is no reference from the Automated Information System “Archaeological Map of Bulgaria” /AIS-AMB/ at NAIM at BAS of the identified archaeological sites on the territory of Nessebar Municipality.

A list of war memorials is not attached.

In the preparation of the plan amendment within the scope of the terms of reference, up-to-date information on the ICP in the municipality should be used.

The draft General Spatial Plan of the municipality should analyse the ICP, its conservation, assess its condition and consider the possibilities of integrating the ICP into functional systems of tourism and recreational activities. Locate the sites and areas of impacts from natural and anthropogenic factors that pose a risk of damage to the ICP and their exposure environment.

To define specific spatial planning regimes for the archaeological sites that correspond to the specificity of the territory they are addressed to.

In the next phase of the project to develop a reference plan and a scheme of the ICP reflecting the protected areas for the conservation of immovable cultural heritage within the meaning of Art. 79, para. 5 and para. 6 of the CHA; to study the need to create spatial prerequisites for the conservation of comprehensive cultural landscapes within the meaning of Art. 47, para. 6 of the CHA; to define criteria for the amendment of the GSP in relation to the ICP, to develop rules and regulations for the implementation of the GSP, which should include a proposal for the delimitation of zones with specific spatial planning regimes for individual types of territories.

Consider the possibility of further developing cultural routes including ICP, taking into account the link with cultural corridors.

Regarding the graphic part of the project, directly related to the cultural and historical heritage sites on the territory of the municipality:

A set of graphic materials is presented:

- “Reference plan” in scale 1:25 000;

In developing subsequent phases of the plan, two sets of graphic materials at an appropriate scale containing the following drawings should be submitted:

- “Reference plan”, reflecting the existing location, type and category of the immovable cultural heritage sites according to the requirements of the Cultural Heritage Act.
- “General Spatial Plan of Nessebar Municipality” - Decision.
- “Plan - scheme for protection and conservation of the CIH sites”, which should reflect the ICPs according to the lists of the NIICH, the NAIM-BAS and the war monuments, in accordance with the provisions of Art. 79, Art. 5 of the CHA, and the protected areas for the conservation of the immovable cultural heritage, formed by the single and group immovable cultural property with their boundaries and buffer zones, should be reflected. In a legend to the plan the acts of declaration, designation, boundaries and regimes should be indicated.

The Terms of reference proposes solutions that do not conflict with the conservation of immovable cultural properties and their socialisation.

**In relation to the above,**

**MINISTRY OF CULTURE AGREES:**

**Terms of reference under Art. 125 of the SPA for the design of the General Spatial Plan (GSP) of the Municipality of Nessebar , with the following requirements:**

- The lists of the ICPs from the NDA of the NIICH, the registration cards from the AIS of the AMB and the list of the war memorials, with all known data of the sites registered so far, are an integral part of the GSPM and should be attached to it.
- The identification data for the immovable cultural property - plan number, district, administrative address, etc. are as of the date of acquisition of their status. In this regard and considering the provisions of §120, para. 1 of the Transitional and Final Provisions to the Law on Amendments and Supplements to the CHA (promulgated - State Gazette, issue 54 of 2011), the Municipality of Nessebar should provide the NIICH with the current addresses and identifiers under the Cadastre and Property Register Act of the found, announced and declared immovable cultural properties, located on the territory of the respective municipality..
- According to item 82 of §5 of the Spatial Planning Act (SPA) “Protected areas for the conservation of cultural heritage” are the single and group immovable cultural properties with their boundaries and buffer zones, according to the conservation regimes defined by the act for their declaration or for granting the status”. Art. 79, para. 5 and para. 6 of the CHA requires the reflection of protected areas for the conservation of immovable cultural heritage in the general spatial plans.
- The GSP should contain information and requirements to the protected areas for the conservation of cultural heritage in accordance with Art. 125, para. 5 of the SPA, reflected, signposted and described in an appropriate manner in the graphic and text parts of the GSPM.
- For single ICPs, for which individual conservation regimes - boundaries and prescriptions are not defined, the requirements of Art. 79, para. 3 and para. 4 of the CHA, and for the archaeological sites - letter No. 545/27.02.2001 of NICM.
- The text and legend to the drawings should indicate the documents by which the conservation regimes have been adopted.

- In the process of developing the new urban design documentation for the Municipality of Nessebar, priority should be given to the interests of protecting the Outstanding Universal Value of the World Heritage Site and the conservation needs of its historic townscape, as well as ensuring appropriate conditions for the World Heritage Site to best protect its Outstanding Universal Value.
- All draft phases of the GSP, Preliminary and Final, are subject to coordination under the CHA.
- The “GSP - Preliminary Draft” should be submitted for approval, complete as follows:
  - General Spatial Plan of Nessebar Municipality in full scope and content (text and graphic part incl. annexes) - 1 CD.
  - 2 paper copies, for the municipality and for the archives of the NIICH, of the following graphic materials from the GSPM:
    - Reference Plan;
    - General Spatial Plan;
    - Scheme for the protection and conservation of CIH sites;
    - Explanatory note with the attached lists of the NIICH NDA sites, the list of the AMB sites and the list of the war monuments with the respective covering letters with which the information is provided.
- This statement is an integral part of the terms of reference for the preparation of the GSP of Nessebar Municipality.
- All subsequent spatial plans, DSP and GSP affecting protected areas for the conservation of cultural heritage shall be subject to coordination under the CHA.
- The GSP of Nessebar Municipality - Preliminary Draft in the section “Cultural Heritage” should be submitted in the scope and content according to the methodological guidelines of the NIICH, available at <http://ninkn.bg/documents/download/70>.

The final assessment and decision, taking into account the compliance of the documentation with the technical requirements, rules and regulations, in accordance with the procedure regulated in the SPA, as well as all the circumstances related to the implementation, ownership of the affected properties and consent of the interested parties are within the competence of the specialized municipal administration.

The applicant shall be notified of this statement in accordance with Order No. ПД09-994/04.09.2024 of the Minister of Culture.

This statement is subject to appeal within 14 days of its notification before the competent Administrative Court - Burgas under the Administrative Procedure Code (APC).

**DEPUTY MINISTER OF CULTURE:**

**AMELIYA GESHEVA**



## ANNEX 2

The information on the building permits issued for the period 2011-2022 is in a separate file (exel table)

## ANNEX 3

### List of project documentation, stored in the National Documentary Archive (NDA) of the National Institute for Immovable Cultural Heritage (NIICH) for the area of the Ancient city of Nesebar 2023-2024

| order number | Localization   | Site   | Location and status of the site under the CHA   | Opinion of the MC No.  |
|--------------|--|--|---|--|
| 1            | Land property with Cadastral map identifier 51500.501.337, Regulated Land Property IV-285, neighborhood 2, Nesebar, 1 Mitropolitska Str. | Design visa and Investment project for the object Reconstruction and change of use of a basement into a kitchen and part of the first floor of a residential building into a catering and entertainment establishment (CEA) in Regulated Land Property IV-285, neighborhood 2, Nesebar, 1 Mitropolitska Street; parts: Architectural and Structural; phase: Technical design | within the boundaries of the group immovable cultural property of world and national importance Ancient City of Nesebar. The building has no status of immovable cultural property. | <u>CT-84-954/24.01.2023</u> does not coordinate the technical design;<br><u>CT-84-954/27.07.2023</u> - coordinates the design vision and does not coordinate the architectural and structural part of the technical design |
| 2            | Regulated Land Property I-community, neighborhood 57A, Land property 51500.501.377.1   | Design visa for Rebuilding of the ground floor of the building with identifier 51500.501.377.1 on the cadastral map - Lyuben Karavelov Secondary School - old town in the computer modeling, information technology and interest room classroom, Regulated Land Property I-common, district 57A on the plan of   | within the borders of the Ancient city of Nesebar. The building does not have the status of immovable cultural property.  | <u>CT-84-29/14.02.2023</u> /coordinated/   |

|   |   |   |  |  |
|---|---|---|--|--|
|   |   | Nesebar- Old town.  |  |  |
| 3 | Land properties with identifiers 51500.502.564, 51500.502.304, 51500.502.563, 51500.502.305, part of Land property with identifier 51500.502.306, part of Land property with identifier 51500.502.556, part of Land property with identifier 51500.502.557 and part of Land property with identifier 51500.502.558 according to Cadastral Map and Cadastral Registers of Nesebar. | Project for Amendment of the Detailed Development Plan - Regulation and Building Plan (DDP-RDP) and Working Development Plan (WDP) for Regulated Land Property II - for seaside park with public services, pumping station, transformer station and landscaping, Regulated Land Property III - for landscaping in the district 78 of the current plan of Nesebar, Municipality of Nesebar; Land property with identifier 51500. 502.564, Land plot with identifier 51500.502.304, Land plot I with identifier 51500.502.563, Land plot with identifier 51500.502.305, part of Land plot with identifier 51500.502.306, part of Land plot with identifier 51500.502.556, part of Land plot with identifier 51500. 502.557 and part of Land property with identifier 51500.502.558 according to the Cadastral map and cadastral registers of Nesebar, Nesebar Municipality, Burgas Region; part: Urban Development; phase: Final design phase | within the buffer zone of the group immovable cultural property of world and national importance Ancient City of Nesebar; Land plot with identifier 51500.502.304 and Land plot with identifier 51500.502.305, according to the Cadastral Map and Cadastral Registers of Nesebar, fall also within the territorial scope of the archaeological immovable cultural property Necropolis of Messambria - Mesembria. | <u>CT-84-532/17.03.2023</u><br>/coordinated/ |
| 4 | Regulated land property VIII-639, district 54, Land property 51500.502.313.4, 1 L. Karavelov Str.   | Pre-investment study for reconstruction, volume reduction, major façade and pitched roof renovation with terraced setbacks of a legally constructed hotel   | within the boundaries of the Necropolis of Mesabria-Mesembria and the World Heritage Site Protection Zone  | Letter No. CT-84-417/22.02.2023.             |

|   |   |  |  |   |
|---|---|--|--|---|
|   |   | Design visa for Reconstruction, redevelopment and major renovation - volume reduction, refacing and pitched roof with terraced setbacks, of hotel - building with identifier 51500.502.313.4 along mandatory building lines and with reduction of building height, Volumetric Planning Study and Investment Project for the object Reconstruction, volume reduction, major renovation of the facade and pitched roof with terraced setbacks of a legally constructed hotel - building with identifier 51500.502.313.4, Land property with identifier 51500.502.313 on the Cadastral map and Cadastral registers of Nesebar, Regulated land property VIII-639 for hotel, restaurant and night club, neighborhood 54 on the plan of Nesebar, Nesebar municipality, Burgas region; 1 Lyuben Karavelov Str.; parts: Architectural and Structural; phase: Technical design (TD) | within the buffer zone of the Ancient City of Nesebar  | <u>CT-84-417/29.01.2024</u> coordinated with requirements   |
| 5 |   | Cultural Heritage Strategy of Nesebar Municipality, 2023-2032  |  | The content of the document was voted on and adopted by the participants in a meeting of the Interdepartmental Commission and the Expert Working Group on 05.06.2023. |
| 6 | Buildings with identifiers 51500.501.410.1 and 51500.501.410.2 according to the Cadastral Map and Cadastral Registers of the town of Nesebar, with location in Land property with identifier 51500.501.410 according to the Cadastral Map and Cadastral Registers of the town of Nesebar, Regulated Land Property I for cinema, neighborhood 37 | Design visa for Energy renovation of buildings for culture and art with identifiers 51500.501.410.1 and 51500.501.410.2 in Regulated land property I, neighborhood 37 according to the plan of the city of Nesebar (Land property 51500.501.410 according to Cadastral map), Burgas region   | within the borders of the Ancient town of Nesebar. There is no data for objects with the status of immovable cultural property in the Land plot with identifier 51500.501.410. Within the boundaries of the Ancient City of Nesebar, in the buffer zone of the single immovable cultural property House of Orthodoxy Chocholov, Ivan 1 Alexander Street, Square No. 463, District 38, Nesebar with the category ensemble significance. | <u>CT-84-948/20.02.2024</u> /coordinated/   |

|   |   |   |   |   |
|---|---|---|---|---|
|   | according to the plan of the town of Nesebar, with administrative address 1 Mesembria Str., town of Nesebar, Nesebar municipality, Burgas region.   |   |   |   |
| 7 | Land plot with identifier 51500.501.195, Regulated land plot II-23, neighborhood 21 of the plan of the town of Kiev. Nesebar - Old Town, Burgas Region, 4 Neptune Str.  | Project for Amendment of the Detailed Development Plan - Regulation and Building Plan (DDP-RDP) for Regulated Land Property II-23, neighborhood 21 on the plan of Nesebar - Old Town, Land Property 51500.501.195 on the Cadastral Map of Nesebar, Burgas Region; part: Urban Development; phase: Final Draft Phase   | within the group immovable cultural property Ancient City of Nesebar the single architectural and structural immovable cultural property with category for significance - House of Konstantin Orthodoxiev, Regulated land property II-23, neighborhood 21 of the plan of Nesebar (State Gazette No. 41 of 1964).;   | <u>CT-84-368/</u><br><u>14.08.2023</u><br>/coordinated/ |
| 8 | Building with identifier 51500.502.288.4 on the Cadastral map and cadastral registers of Nesebar, in land property with identifier 51500.502.288 on the Cadastral map and cadastral registers of Nesebar, Regulated land property IX-795, neighborhood 78 on the plan of Nesebar, 1 Han Krum Str., Nesebar, Nesebar Municipality, Burgas Region | Visa for design and Changes under Article 154 of the Spatial Planning Act to the approved Investment project to the Building Permit No. 39/25.03.2005 for the object Alteration, reconstruction and change of the facade of a multi-family residential building with identifier 51500.502.288.4 on the Cadastral map and cadastral registers in Regulated land property IX-795, district 78 on the plan of Nesebar; parts: Architecture, Construction; phase: Technical design (TD) | within the boundaries of Land property with identifier 51500.502.288 on the Cadastral map and cadastral registers of Nesebar, Regulated land property IX 795, neighborhood 78 of the plan of Nesebar, there is no data for an object with the status of a single immovable cultural property.<br><br>It falls within the buffer zone of the Ancient City of Nesebar on the mainland;<br><br>within the territorial scope of the archaeological immovable cultural property (AICC) Necropolis of Messambria-Mesembria. | <u>CT-84-626/</u><br><u>21.09.2023</u><br>/coordinated/ |
| 9 | Land property 51500.501.396 on Cadastral map, Regulated land property IV, neighborhood 48 on the plan of Nesebar  | Investment project for conservation, restoration, exposure and socialization of immovable cultural property St. Clement Church, Nesebar - old town, Regulated land property IV, neighborhood 48 of the plan of Nesebar, Land property 51500.501. Architecture, Constructions, Technology for conservation and restoration works, Geodesy, Electrical, Water supply and sewerage,  | within the boundaries of the Ancient City of Nesebar immovable cultural property, architectural and construction with category national importance and artistic   | <u>CT-84-121/</u><br><u>09.10.2023</u> /agreed/         |

|    |  |  |  |  |
|----|--|--|--|--|
|    |  | heating, ventilation and air conditioning, Health and 10safety plan; phase.  |  |  |
| 10 | Regulated land property II-468, neighborhood 105 and Regulated land property II-454, neighborhood 106 according to the plan of Nesebar - Star town, Nesebar municipality, Burgas region. | Investment project for Street water pipeline for Regulated land property II-468, neighborhood 105 and Regulated land property II-454, neighborhood 106 on the plan of Nesebar - Old town, Nesebar municipality; parts: water supply and sewerage, geodesy and fire safety; phase: technical design   | on the territory of the buffer zone of the Ancient City of Nesebar on the peninsula  | <u>CT-84-120/</u><br><u>29.09.2023</u><br>/coordinated/, with monitoring by an archaeologist |
| 11 | Ancient City of Nesebar, Nesebar municipality, Burgas region.  | Assignment for the elaboration of the Conservation and Management Plan (CMP) of the Ancient City of Nesebar  |  | CT-84-276/30.04.2024<br>/positive opinion/   |
| 12 | Tsar Simeon Street, land plot with identifier 51500.501.392 according to the Cadastral Map and Cadastral Registers of Nesebar, Nesebar Municipality, Burgas Region.                      | Visa for design for reconstruction of sewerage on Tsar Simeon Str., land plot with identifier 51500.501.392 on the Cadastral map of Nesebar and Investment project for the object Emergency repair of domestic sewerage on Tsar Simeon Str. in the section between Mesembria Str. and Mena Str., Nesebar; parts.   | within the boundaries of the Ancient City of Nesebar   | CT-84-193/<br>30.04.2024<br>/coordinated/  |
| 13 | Regulated land plot IV, neighborhood 10 on the plan of Nesebar – Old Town, 1 Venera Street, Land plot with identifier 51500.501.104 on the Cadastral map of Nesebar                      | Investment project for emergency conservation and restoration interventions on the church St. Archangels Michael and Gabriel in Nesebar, Regulated land property IV-235, neighborhood 10, Venus Street 1, Land property with identifier 51500.501.104 on the Cadastral map and cadastral registers of Nesebar; parts: Technology for Conservation and Restoration Works, Architectural Opinion, Structural Opinion | within the boundaries of the Ancient City of Nesebar architectural and structural immovable cultural property with category national importance within the boundaries of the Ancient City of Nesebar | CT-84-543/18.10.2024<br>/coordinated/  |



|    |  |   |  |  |
|----|--|---|--|--|
| 14 | Land property (LP) with identifier 51500.501.456 by Cadastral Map and Cadastral Registers, Nesebar, Nesebar municipality, Burgas region.                       | Scheme for placement of relocatable objects and facilities, including additional commercial area under Article 10, paragraph 8 of the Law on the Spatial Development of the Black Sea Coast, for the sea beach Nesebar-East, Nesebar Municipality, Burgas Region and Investment project for the site: Quick service restaurant - retail outlet, type "restaurant" and adjacent additional commercial area at position 10, medical station at position 3 and toilet at position 8 of the Scheme for the relocatable objects and facilities under Article 10, paragraph 8 of the Law on the Spatial Planning of the Black Sea Coast for the sea beach Nesebar East, Nesebar Municipality; parts Architectural, Structural opinion, Plumbing scheme, Electrical scheme; phase: Technical design (TP) |  | CT-84-680/20.06.2023 <b>refusal for coordination</b>   |
|    |  | identical   |  | National Institute for Immovable Cultural Heritage (NIICH) No. 7000-3289/25.03.2024 / ref. No. CT-84-680/27.03.2024; file No. 9-1600 |
| 15 | Regulated land property I-128, neighborhood 31a, on the plan of Nesebar, 18 Ivan Asen II Street, Land property 51500.501.242 from the Cadastral map of Nesebar | Coordination of the Project for Amendment of the Detailed Development Plan - Regulation and Building Plan (DDP-RDP) and Working Development Plan (WDP) for Regulated Land Property I-128, District 31a, on the plan of Nesebar, 18 Ivan Asen II Street, Land Property 51500.501.242 from the Cadastral Map of Nesebar   | within the boundaries of the Ancient City of Nesebar. The building in the land plot 51500.501.242 does not have the status of immovable cultural property, but is in the offer zone of the single immovable cultural property for information - House of Todor Petelov, T. Trapchev.   | Ex. No. 9400-7214-4/ 27.08.2024 / Ref. No. CT-84-320/29.08.2024  |
| 16 | Land property 51500.501.318.1 on Cadastral map, Regulated land property IX-559, neighborhood 55, on the plan of Nesebar, Burgas region, 19 Mesembria Str.      | Design visa for Internal reconstruction of the existing ground floor of the building with ID 51500.501.318.1 in the Tourist Information Center, Regulated land property IX, neighborhood 55, on the plan of Nesebar, Burgas region  | within the borders of the Ancient City of Nesebar. The building has no status of immovable cultural property. It falls within the buffer zone of: - the single immovable cultural property of national importance - St. Clement Church and the single immovable cultural property of local importance - Elena Petrova House. | Ex. No. 0800-7106-1 / 04.11.2024 / Ref. No. CT-84-724/05.11.2024   |

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|----|--|--|---|---|
| 17 | Land property 51500.501.376.1 according to the Cadastral Map and Cadastral Registers of Nesebar (plot No. 315) in neighborhood 51, Monsignor Angelo Roncalli Street, Nesebar   | Commissioning of the object<br>Conversion of an existing building and change of its use into a restaurant in Land plot 51500.501.376.1 according to the Cadastral map and cadastral registers of Nesebar (plot No. 315) in neighborhood 51, Monsignor Angelo Roncalli street, Nesebar  | within the borders of the Ancient town of Nessebar. In Land plot 51500.501.376. The building has no status of immovable cultural property.  | Ex. No. 7000-4819-1 / 30.10.2024/ Ref. No. CT-84-703/31.10.2024               |
| 18 | Land property with identifier 51500.502.313 on the Cadastral map and cadastral registers of Nesebar, building with identifier 51500.502.313.4, Regulated land property VII-639 for hotel, restaurant and disco, neighborhood 54 on the plan of Nesebar, Nesebar municipality, Burgas region, 1 Lyuben Karavelov street | Investment project for the object External power supply of reconstruction, volume reduction, major repairs of facade and pitched roof with terraced setbacks of a legally constructed hotel-building with identifier 51500.502.313. 4, Land property with identifier 51500.502.313 according to the Cadastral Map of Nesebar, identical with Regulated Land Property VII, neighborhood 54 according to the Plan of Regulation and Construction of Nesebar, under Annexation Agreement No. 16070/2010, 4450681, Annex No. 1/11.05.2010, and Annex No. 2/26.03.2024. Sub-object: LV cables; part: EL; phase: technical design. | within the buffer zone of the World Heritage Site and within the archaeological immovable cultural property Necropolis of Mesembria-Messambria  | Ex. № CT-84-417/22.11.2024r. / Ex. № 9400-5250-33 / 16.09.2024/ /coordinated/ |
| 19 | Regulated land property I, neighborhood 56 on the plan of Nesebar - old town /Land property 51500.501.321 on the cadastral map of Nesebar  | Project for emergency conservation and restoration interventions on the Church of Christ Pantocrator in Nesebar, Neighborhood 56, Regulated Land Property I-321, Plot No. 287, Land Property with Identifier 51500.501.321 according to the Cadastral Map and Cadastral Registers of Nesebar, 1 Mesambria Street, parts: Technology for Conservation and Restoration Works, Structural Opinion   | within the boundaries of the Ancient City of Nesebar Architectural and structural immovable cultural property of national importance within the boundaries of the Ancient City of Nesebar | Ex. No. CT-84-542/25.11.2024/ Ex. № 4500-525-1 / 15.08.2024 /coordinated/     |
| 20 | land plot with identifier 51500.502.564 according to the Cadastral map and cadastral registers of Nesebar (Regulated land property II-564, neighborhood 78), land property with identifier 51500.502.885 according to the  | Investment project for Recreation and Attraction, Regulated land property I and Regulated land property II, neighborhood 78 on the plan of Nesebar. Sub-object 2: External and on-site plumbing networks in Regulated land property I and Regulated land property  | within the buffer zone of the Ancient City of Nesebar on the mainland   | Ex. CT-84-532/22.11.2024/ Ex.No. 0800-7071-1 / 23.07.2024 / /coordinated/     |

|        |   |   |   |   |
|--------|---|---|---|---|
|        | Cadastral map and cadastral registers of Nesebar (Regulated land property I, neighborhood 78), Nesebar, Nesebar municipality, Burgas region.  | III, neighborhood 78 on the plan of Nesebar; part: plumbing; phase: technical design  |   |   |
| 21     | Building in Land property with identifier 51500.501.403, according to the Cadastral map and cadastral registers of Nesebar, constituting Regulated land property II-163, neighborhood 47, according to the plan of Nesebar, Burgas region, with administrative address Nesebar, 16 Mesambria street | Current repair of the roof of the Residential building located in the Land property with identifier 51500.501.403, according to the Cadastral map and cadastral registers of Nesebar, constituting the Cadastral map and cadastral registers II-163, neighborhood 47, according to the plan of Nesebar, Burgas region, with administrative address Nesebar, 16 Mesambria street, part: Explanatory note, including a bill of quantities | within the borders of the Ancient City of Nesebar. The building has no status of immovable cultural property. | Ex. No. 9400-6341 / 14.10.2024/ Ref. No. CT-84-636/15.10.2024 |
| Legend | coordinated   | partially coordinated or with requirements  | refusal to coordinate   | no opinion issued yet   |

## ANNEX 4

### INFORMATION ON REMOVED ILLEGAL CONSTRUCTIONS ON THE TERRITORY OF ANCIENT CITY OF NESSEBAR

*For the preparation of the information were used reports of the Regional Directorate for National Building Control - Burgas (RDNBC-Burgas) for the period 2010-2022 and data provided by the Municipality of Nessebar.*

The Directorate for National Building Control (the DNBC) 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 Nessebar Municipality for action by competence. The remaining 39 removal orders have not been appealed or have been confirmed by the courts and have entered into force.

The remaining 24 effective removal orders are in the procedure under Ordinance No. 13/2001 of the Ministry of Regional Development and Public Works (MRDPW) for the enforcement of orders for the removal of illegal structures or parts thereof by the DNBC authorities, which are at the stage of - selection of contractor and setting a date for the compulsory removal. Given the specific nature of the structures, the compulsory removal should be carried out by an authorised construction company to carry out restoration and conservation of immovable cultural property, based on designs agreed by the Ministry of Culture.

- 1. Procedure under Ordinance 13 for compulsory removal – “Conversion of existing two-storey residential building with cellar, by superstructure with third floor”, located in Zoned Land IX-246, quarter 12 on the plan of Nessebar, 9 Venera Str., Nessebar, with performer Georgi Atanasov Kutev**



*Before removal*



*After removal*

**Third floor voluntarily removed within the enforcement period. The parameters of the building have been restored according to the approved investment project**



2. “Superstructure of a two-storey residential building with a third floor”, located in the regulated property land /Zoned Land/ I-202, quarter 14 on the plan Nessebar, administrative address 6 Venera Str., Nessebar, with the performer Nikolay Yanakiev



*Before removal*



*After removal*

At the request of the owner the superstructure was removed voluntarily. The parameters of the building have been restored according to the approved investment project.

3. Procedure under Ordinance 13 for the compulsory removal of two shops, located in the regulated land plot /Zoned Land/ III-201, quarter 14 on the plan of Nessebar /old part/, with administrative address 3 Slavyanska Str.



*During removal  
The removal order was enforced.*





*After removal (The stone masonry of the fence wall and the wooden gate have been restored. There is a shop behind the gate to the courtyard, but without interventions in the masonry and without a roof over the fence wall.)*

4. Illegal construction “Terrace to the 2nd floor of a residential building” in Zoned Land III-201, quarter 14 of the plan for Nessebar, 3 Slavyanska Str. with performer Georgi Petrov Stamkov (No photos)

*The DNBC Deputy head’s removal order has been voluntarily executed.*

5. Procedure under Ordinance 13 for compulsory removal – “Superstructure over an existing two-storey residential building”, located in the regulated property land (zoned land) VII-35, quarter 11 of the plan of Nessebar /old part/, with administrative address Nessebar, 11A Aurora Str., with performer Simeon Hristov



*Before removal (the brick building)  
(view from Khan Asparuh street)*



*After removal (still without a roof)  
(view from Aurora street)*

**The order was voluntarily executed and the illegally built superstructure was removed.**

6. Illegal construction “Balcony to the first floor”, built at +1,60 m from the level of the street pavement, Zoned Land VII-8, quarter 20, 29 Emona Str. with performer Ivan Bogdanov (No photos)

*The illegal construction was removed voluntarily (2016)*

7. Illegal construction “Conversion of an existing building into a shop” located in Zoned Land VII-79, 11 Emona Str. with performer Dobrinka Nikolova



*After removal*

The construction was removed voluntarily, established by the Record of the Municipality of Nessebar.

8. Removal of “Attic floor above the second floor of a residential building”, located in the regulated property land /Zoned Land/ IV-83, quarter 28 on the plan of Nessebar, with administrative address 9 Asparuh Str., Nessebar - old part, performers Plamen Kehayov and Danislav Kehayov.



*Before removal*



*After removal*

*Removed superstructure - attic floor (2021)*

At present, the construction is completed and there is a Certificate of Completion Model 15 dated 06.12.2021 to establish the suitability for acceptance of the construction.



9. Procedure under Ordinance 13 for the compulsory removal of the “Superstructure to an existing two-storey building”, located in the regulated land plot /zoned land/ II-126, quarter 31 on the plan of Nessebar /old part/, with administrative address 14 Ivan Asen II Str., with performer Alexander Stoyanov



*Before removal*



*During removal*

*The roof and fourth floor were forcibly removed.*

10. Illegal construction “Superstructure over an existing two-storey residential building” located in Zoned Land IV-140, quarter 35, 10 Ivan Alexander Str. with performer Martin Bogdanov



*Both pictures are after the removal*

*The superstructure was removed and the roof was restored to the old cornice level.*

11. Illegal construction “*Superstructure - attic floor over existing two story building*“, quarter 36, Zoned Land II-459, with administrative address Nessebar, 4 Ivan Asen II Str., owned by Margarita Georgieva Petrova and Tanya Aristidova Parusheva



*Before removal*



*After removal*

*During an inspection of the construction by RDNBC - Burgas it was found that the illegal part (superstructure - attic floor) was removed voluntarily.*

12. “*Reconstruction of an existing terrace on the southern facade of a residential building - monument of culture and construction of an external staircase to it*“, located in Zoned Land II-100, quarter 42 on the plan of Nessebar, 2a Slavyanska Street



*The structure was removed voluntarily.*

*The terrace with a staircase was on the first floor of the facade facing the courtyard.*



- 13. Illegal construction “Base station” with performer “Telenor Bulgaria” Ltd., executed on the roof of an illegal superstructure in Zoned Land II-175, quarter 43, 4 Tervel Str.  
The illegal construction was removed voluntarily (2015).**

Order No. DK-02-SPR-7/16.06.2015 of the Head of RDNBC SPR for the removal of illegal construction No.1a “Base station” located on the roof of the illegal extension of the residential building in Zoned Land II-175, quarter 43 has been implemented and the illegal construction has been removed, for which a statement of findings of the RDNBC – Burgas.

- 14. Illegal construction “Superstructure of two-storey residential building”, located in Nessebar /old part/, administrative address Nessebar, 11 Ivan Alexander Str., property land with identifier 51500.501.434.1, former quarter 50, regulated property land /Zoned Land/ V-311 on the plan of Nessebar with performer Atanas Kufetov and Radka Kufetova.**



*Before removal*



*After removal*

*(The photo also shows the stone pavers that replaced the asphalt)*

**The owners have voluntarily removed the structure.**



15. Illegal construction “Addition over an existing two-story residential building”, located in Zoned Land I-347, quarter 57, 15 Mena Str. in Ancient City of Nessebar, with performer Dimitar Kozhuharov.



*Before removal*



*After removal*

*The superstructure was removed voluntarily. (2017). The photo also shows the stone pavers that replaced the asphalt.*

From Ch. architect of the municipality of Nessebar, building permit No. 324/22.12.2017 was issued. for "Remodeling of a roof and facade restoration of a two-story residential building".

16. Removal of illegal construction “Laying of new asphalt pavement on Mitropolitska Str., Hemus Str., Venera Str. and Messembria Str.”



*The asphalt pavement was voluntarily removed and the traditional stone pavement, stone slabs on Mitropolitska, Hemus and Messembria Str. in the Old Town were restored.*

For the construction a Statement of Findings dated 25.11.2016 has been drawn up. To the project documentation are attached the coordination opinions No. CT- 84-707/10.03.2022 and No. 33-IH-100/19.11.2018 of the Ministry of Culture.

17. Procedure under Ordinance 13 for the compulsory removal of the construction “Outbuilding and extension of a residential building” in the regulated property land (zoned land) IV-108, quarter 41, 26 Mitropolitska Str., performer Maria Lyahovich.



*Before removal*



*After removal*

**Partially Completed** - The superstructure has been removed voluntarily but the outbuilding has not been removed.

18. Removed temporary structures (eateries) above the north bank.



**Implementation of a space improvement project**



*After removal*



*Before removal*



## ANNEX 5:

### *Report of the GDOCN for inspections and acceptance commissions carried out on the territory of the Ancient City of Nessebar and in its buffer zone:*

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*Directorate General "Inspectorate for the Preservation of Cultural Heritage"*

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Reg. No.....2024

TO  
MR. NAYDEN TODOROV  
MINISTER FOR CULTURE

## REPORT NOTE

by Alexander Traykov - Director General of the General Directorate "Inspectorate for the Preservation of Cultural Heritage" (IPCH) at the Ministry of Culture

**SUBJECT:** Control of the compliance with the requirements of the Cultural Heritage Act and the acts issued on its basis, related to the territorial and spatial protection of the Group immovable cultural property "Archaeological reserve and historical settlement - architectural - structural and urban immovable cultural property - "Ancient City of Nessebar", and expert commissions held under Art. 158a of the CHA for the acceptance of archaeological studies carried out on the territory of the world immovable cultural property.

**DEAR MR TODOROV,**

In connection with the preparation of a report on the monitoring of the Group immovable cultural property "Archaeological reserve and historical settlement - architectural - structural and urban immovable cultural property - "Ancient city of Nessebar", I provide you with the following information:

#### **I. In 2024, the following expert commissions were held under Art. 83a of the CHA:**

1. In the period 17.06 - 18.06.2024, in accordance with the Order No. ПД9К-170/21.05.2024 of the Director General of the GD IPCH, issued on the basis of Art. 83a, para. 2 of the Cultural Heritage Act /CHA/, for the site: "Revitalization, enrichment of the exposition and current repair under Art. 151 of the SPA of Moskoyanov's house - Ethnographic Museum in the city of Nessebar, RLP I, quadrant 34 according to the plan of the city of Nessebar - old part of the city, Land Property 51500.501.412 according to the Cadastral Map of the city of Nessebar, 1 Messembria Street, a

commission has been established with the task of checking the submitted documentation for the project, establishing the quality of the completed restoration works on facades, Conservation and restoration works in interior and roof repair and proposing to the Minister of Culture to accept or refuse reasonably activities under the project: "Revitalization, enrichment of the exposition and current repair under Art. 151 of the SPA of Moskoyanov's house - Ethnographic Museum in the city of Nessebar, RLP I, quadrant 34 according to the plan of the city of Nessebar - old part of the city, Land Plot 51500.501.412 according to the Cadastral Map of the city of Nessebar, 1 Messembria Street. Upon the inspection of the documentation, comparison of the envisaged for implementation in the investment project agreed by the Ministry of Culture, conservation and restoration works of facades, Conservation and restoration works in interior and roof repair within the meaning of Art. 83a, para. 1, item 1 of the CHA for the aforementioned site and the on-site inspection, the Commission has established that the same have been executed qualitatively and in accordance with the project documentation.

**II. In 2024 and 2023, the following inspections under Art. 192, para. 1 of the CHA are carried out on the spot following a report:**

1. Inspection carried out on 01.11.2024 in connection with letter No. 33-00-821/23.10.2024 to the Ministry of Culture by the Director of NIICH regarding illegal construction on the building of immovable cultural property with identifier 51500.501.151.1, and within its boundaries – Land Plot 51500.501.151 and fence walls, with administrative address: 1 Mitropolitska Str. and 2a Slavyanska Str., old part of the city of Nessebar. At an unspecified time in the past, interventions have been carried out on the ICP building at Land Plot 51500.501.151, consisting of: removal of the single-pane wooden windows of the two second floor living quadrants, as well as the southeastern first floor room, all located in the eastern half of the ICP building and installation in their place of modern brown PVC window frames with glazing, as well as construction of an opening in the western part of the southern fence wall of Land Property 51500.501.151 with the installation of a double wooden door for the entrance on the south side of a one-story commercial building - gift shop. With regard to the violations found, the Head of the RDNCC-Burgas, in accordance with the powers granted to him under Art. 222 of the SPA, should order an on-site inspection under its jurisdiction, as well as initiate administrative proceedings under Art. 225 of the SPA. With regard to the violations found, which were carried out in violation of the requirements of Art. 83 of the SPA without coordination pursuant to Art. 84, para. 1 and 2 of the CHA of an investment project, in order to stop the violations and eliminate their consequences, the violators will be subject to compulsory administrative measures, in accordance with the provisions of Art. 192, para. 1, item 2 and para. 2 of the CHA.

2. Inspection under Art. 192, para. 1 of the CHA, carried out on 25.03.2024 and 26.03.2024 in connection with a letter received with Ref. No. 33-00-151/28.02.2024, from NIICH regarding unlawful actions of Georgi Georgiev Kavrov on demolition of a summer kitchen and actions taken on construction of a new massive building on the same place in the Land Plot with identifier 51500.501.151 according to the Cadastral Map of the city of Nessebar. Major repair of the complementary building in the yard of the Land Plot with identifier 51500.501.151 under the Cadastral map and cadastral registers of the city of Nessebar was established, located northeast of the ICP building with identifier 51500.501.151.1 on the Cadastral map and cadastral registers of the city of Nessebar, and representing a building with identifier 51500.501.151.2 under the Cadastral map and cadastral registers of the city of Nessebar, in violation of Art. 83, para. 1, item 1, letter "a" of the CHA. For the constructed two one-storey buildings with commercial purpose - gift shop, located in the southern part of the Land Plot 51500.501.151 and passing into the Land Plot 51500.501.488 no



documents were found in the archive of the Nessebar Municipality, and no coordinated schemes or projects were found in the National Documentary Archive at the NIICH, in violation of Art. 83, para. 1, item 1, letter “b” of the CHA. In order to put an end to the violation the Mayor of Nessebar Municipality, in accordance with the powers granted to him under Art. 223 of the SPA, was instructed to order an on-site inspection of the executed construction works and to initiate administrative proceedings under Art. 225a, para. 1 of the SPA.

3. Inspection under Art. 192, para. 1 of the CHA, carried out on 26.08.2024 in connection with a Letter received by the Ministry of Culture with Ref No. 94-00-1969/30.07.2024 from Emiliya Dimitrova, regarding a catering establishment “Captain Nemo”, located at “Krabrezhna” Str. in the city of Nessebar, in the Land Plot with identifier 51500.501.9 on the Cadastral map and cadastral registers of the city of Nessebar. The relocatable site “Captain Nemo” snack bar from the Sketch with items No. 10/2024 under Art. 17, para. 2 of Ordinance No. 10 of the Municipality of Nessebar in 51500.501.9 on the Cadastral map and cadastral registers of the city of Nessebar with an adjacent additional commercial area, at the time of the inspection was fully constructed and functioning, as evidenced by images from the Google Street View programme, the same as of March 2012 was existing and located at the same location, and as of June 2015 was in its current architectural appearance and configuration of relocatable modules. There are no schemes or design documentation available for the site agreed with the MoC, i.e. it has been sited without a scheme or design agreed with the Ministry of Culture under Art. 84, para. 1 and para. 2 of the CHA, in violation of the requirements of Art. 83, para. 1, item 2, letter “c” of the CHA, as well as that there is no placement permit issued, necessary according to the requirements of Art. 56, para. 2 of the Spatial Planning Act (SPA), therefore the movable site is placed in violation of the requirements of the SPA and is illegally placed. The Mayor of Nessebar Municipality, in accordance with the powers granted to him under the spatial Planning Act and under Art. 71 of Ordinance No. 10 of Nessebar Municipality, is directed to order an on-site inspection under his competence, as well as to initiate administrative proceedings under Art. 57a of the SPA and Art. 29, para. 1 of the aforementioned Ordinance.

4. Inspection carried out on 12.09-02.11.2023 in connection with a signal forwarded by the NIICH for jurisdiction, received at the office of the NIICH with Reg. No. 9400-9515/20.07.2023 from Mr. Dimitar Georgiev, regarding a request for inspection of the site “At the Bossman” in Old Nessebar. “Movable site – Quick service establishment” from the sketch with items No. 3/2023 under Art. 17, para. 2 of Ordinance No. 10 of the Municipality of Nessebar in Land Plot 51500.501.377 (RLP I-municipality, quadrant 57a) of the Cadastral map of the city of Nessebar (old part of the city) with an adjacent additional commercial area, at the time of the inspection was fully built and functioning, as evidenced by images from the Google Street View programme, the same was existing as of March, 2012, having been placed without a scheme or project coordinated with the Ministry of Culture under Art. 84, para. 1 and para. 2 of the CHA, in violation of Art. 83, para. 1, item 1, letter “d” of the CHA. The Mayor of Nessebar Municipality, in accordance with the powers granted to him under Art. 71 of Ordinance No. 10 - on the procedure and conditions for the placement and removal of movable sites, advertising and information and monumental-decorative elements on the territory of the municipality of Nessebar, is directed to order an on-site inspection, as appropriate, of the illegally placed site: “Movable site – Quick service establishment” from the sketch with items No. 3/2023 under Art. 17, para. 2 of Ordinance No. 10 on the Procedure and Conditions for the Placement and Removal of Movable sites, advertising and information and monumental decorative elements on the Territory of the Municipality of Nessebar in land Plot 51500.501.377 (RLP I-municipality, quadrant 57a) of the Cadastral map of the city of Nessebar /old part of the city/, for 2 modules intended for quick service, as well as to initiate administrative

proceedings pursuant to Art. 57a of the SPA and Art. 29, para. 1 of the above-mentioned Ordinance.

5. Inspection carried out on 07.06.2023 in connection with a signal received in the MoC Reg. No. 94-00-995/10.05.2023, from Georgi Dimitrov Shishmanidov - Chairman of NGO "Mesemvria 2020", town. Nessebar and Krastyo Hristov Peev - Chairman of NGO "Nessebar Public Council", city of Nessebar, regarding a request for an inspection under Art. 192 of the CHA of the site: Southern Yacht Port and Ensemble of Buildings with a Flat Roof, Land Plot 51500.501.454 under the Cadastral map and cadastral registers of the city of Nessebar. At the time of the inspection, for the construction: "Commercial and service complex "Marina Nessebar 2", being built in Land Plot 51500.501.454 under the Cadastral map and cadastral registers of the city of Nessebar, RLP II-454, quadrant 106, city of Nessebar, no violations of the requirements of the CHA were found, as the same was implemented in accordance with the issued coordination opinions and the approved design documentation by the Ministry of Culture.

6. Verification carried out on 06.06.2023 in connection with a signal received in the MoC with Reg. No. 94-00-995/10.05.2023, from Georgi Dimitrov Shishmanidov - Chairman of NGO "Mesemvria 2020", city of Nessebar and Krastyo Hristov Peev - Chairman of NGO "Nessebar Public Council", city of Nessebar, regarding a request for an inspection under Art. 192 of the CHA of a site: Built establishment on the beach "Nessebar Old Town – East", land plot 51500.501.456, Burgas region, Nessebar municipality, city of Nessebar. In the southern part of the sea beach "Nessebar - East", next to the building of the Nessebar sea station, a built and functioning quick service establishment was found. The building is positioned on the site provided under number 10 for a retail outlet - quick service establishment in accordance with the scheme for relocatable sites and facilities on the beach "Nessebar - East". The prepared "Scheme for the placement of relocatable sites and facilities, including additional commercial area under Art. 10, para. 8 of the DBSCA on the sea beach "Nessebar-East", municipality of Nessebar, Burgas region", has not been coordinated under Art. 84, para. 1 and para. 2 of the CHA with the Ministry of Culture in accordance with the provisions of Art. 83, para. 1, item 2, letter "c" of the CHA. A project for a "Movable site – Quick service establishment" with an additional commercial area adjacent to it at position 10, a medical center at position 3 and a toilet at position 8 of the scheme for movable sites and facilities under Art. 10, para. 8 of the DBSCA on the Nessebar – East Beach, Nessebar Municipality", in violation of the provisions of Art. 83, para. 1, item 2, letter "c" of the CHA has not been coordinated in accordance with the procedure of Art. 84, para. 1 and para. 2 of the CHA with the Ministry of Culture, therefore the quick service establishment envisaged by the above-mentioned project is illegally constructed. The Mayor of Nessebar Municipality, in accordance with the powers granted to him under Art. 71 of Ordinance No. 10 - on the terms and conditions for the placement and removal of movable sites, advertising and information and monumental-decorative elements on the territory of the Municipality of Nessebar, is directed to order an on-site inspection, under the competence of the illegally constructed site: Movable site – Quick service establishment" with an additional commercial area adjacent to it at position 10, a medical center at position 3 and a toilet at position 8 of the scheme for movable sites and facilities under Art. 10, para. 8 of the DBSCA on the Nessebar – East Beach, Nessebar Municipality", as well as to initiate administrative proceedings under art. 29, para.1 of the aforementioned Ordinance.

7. Inspection carried out on 05.06.2023 in connection with a letter received in the MoC with Reg. No. 94-00-995/10.05.2023 from Georgi Dimitrov Shishmanidov, Chairman of the NGO "Mesembria 2020", city of Nessebar, in connection with the procedure initiated for preparation of the "Cultural Heritage Strategy of Nessebar Municipality" from 2023. In the completed construction of a building in RLP II-695, quadrant 18a, Land Plot with identifier 51500.501.5 according to the

Cadastral map of the city of Nessebar, the level of the existing slope (adjacent terrain) was not restored at an elevation of 13.10 m above sea level, but was significantly lowered to an elevation of 10.80 m, thus the first basement floor appears to be an above-ground floor in relation to the facade to the north, and the building is unlawfully increased in height by one floor. The ascertained implementation of the first basement level (elevation  $-4.175=10.78$ ), as an above-ground floor in relation to the facade to the north of the building, as well as the implementation of an adjacent terrace is in violation of the project coordinated with Opinion No. 33-HH-26213/10.12.2015 of the Ministry of Culture “Modification during construction under Art. 150 of the SPA of the site: “Residential building in RLP II-695, Land Plot with identifier 51500.501.477 under the Cadastral map, quarter 18a, Kraybrezhna Str., city of Nessebar”, as well as in violation of the requirement in Letter No. 1037/06.07.1998 of the NICM: “With the obvious need for the foundation of the building in the northern direction to be executed in depth, the technical solution should provide for the possibility of restoring the slope to an absolute ground elevation of 13.10 m”, therefore the executed changes are illegal. There are interventions in relation to the uncovered archaeological structures - ancient walls and pathway, through the implementation of framing reinforced concrete walls and the removal of authentic elements, are in violation of the project “Modification during construction under Article 150 of the SPA of the site: “Residential building in RLP II-695, Land Plot with identifier 51500.501.477 according to the Cadastral map, quadrant 18a, Kraybrezhna Str., city of Nessebar as well as in violation of decision 5 of Protocol Ref. No. 10-00-0009/06.12.2011 of the Ministry of Culture: “To preserve and exhibit the mortar joint wall, which is connected and attached to the Basilica of St. Mother of God Eleusa, as well as the accompanying stone path east of it”. The aforementioned construction works have been carried out in violation of the project coordinated with Opinion No. 33-HH-26213/10.12.2015 of the Ministry of Culture and approved on 23.02.2016 by the Municipality of Nessebar: “Modification during construction under Art. 150 of the SPA of the site: “Residential building in RLP II-695, Land Plot with identifier 51500.501.477 according to the Cadastral map, quadrant 18a, Kraybrezhna Str., city of Nessebar”, are therefore illegal. The Head of the RDNCC-Burgas, in accordance with the powers granted to him under Art. 222 of the SPA, is instructed to order an on-site inspection of the implemented construction in RLP II-695, quadrant 18a, Land Plot with identifier 51500.501.5 according to the Cadastral map of the city of Nessebar, as well as to initiate administrative proceedings pursuant to Art. 225, para. 1 of SPA.

8. Inspection carried out on 30.01.2023 in connection with letter No. 94-00-2562/14.11.2022 received by the Ministry of Culture from Dr. arch. Milen Marinov, concerning the issuance of an order for the preparation of a project for the restoration of the Church of St. Vlaherna, city of Nessebar and its exposure. The single architectural and construction immovable cultural property “Church “St. Vlaherna” – apse” is preserved on site, and its type and condition correspond to the description and photo documentation from file with Index No. Бс-I-721-7 of the National Documentary Archive of the NIICH. It was registered as a monument of culture in 17.09.1956 and then declared in State Gazette No. 41/1964 only the apse of the church “St. Vlaherna”, not the whole church. Already in Questionnaire No. 5 of the immovable cultural monuments of 1959 for the “Church of St. Vlaherna” - apse” as the type and condition of the monument, it is indicated that it is a ruin of an apse part of a church known to the population under the name “St. Vlaherna”, with approximate size and shape: an apse wall, about 2 m long, about 2.20 m high. The same is confirmed by the file with Index No. Бс-I-721-7 of the “Church of St. Vlaherna – apse”, kept in the National Documentary Archive of the NIICH, where it is stated that the monument is an apse part of the Church of St. Vlaherna, which is built into the wall of the apothecary's house. It is noted that the main apse is preserved, up to 2 m high, with part of the decoration of the sphere - bricks arranged in

triangular shapes, and horizontally between them. Below, the masonry continues with flat stone and brick pieces. The prosthesis is preserved throughout. The lower part is built of mixed masonry - stone and brick. The upper part at the welding is decorated with bricks. Part of the file is also a photo documentation showing the preservation of the “Church of St. Vlaherna” – apse”. From the on-site inspection, it was found that on the ICP “St Vlaherna”-apse”, there is no interventions in violation of the CHA. With regard to the request made by letter No. 94-00-2562/14.11.2022 for the issuance of an order by the Minister of Culture for the preparation of a project for the restoration of St. Vlaherna Church, city of Nessebar and its exposure, it should be borne in mind that according to §4, item 15 of the Additional Provisions of the CHA “Reconstruction based on authentic data of an immovable cultural property” is a complete or partial reconstruction based on graphic, textual, photographic documentation and other sources that provide information about the form and design, materials and substance, use and function, tradition and techniques, location and setting, spirit and mood/feeling and other internal and external factors. Unfortunately, no such data has been preserved regarding the ICP “Church “St. Vlaherna” – apse”, in connection with which, given the fact that only the apse of the temple has been declared an immovable cultural asset, which itself is a ruin, there is no basis for issuing an order by the Minister of Culture to prepare a project for the restoration of the Church of “St. Vlaherna” in the city of Nessebar and its exposure.

9. Inspections carried out in the period 01.07-11.12.2023 in connection with a signal received in the MoC with Reg. No. 94-00-995/10.05.2023, from Georgi Dimitrov Shishmanidov - Chairman of NGO “Mesemviria 2020”, city of Nessebar and Krastyo Hristov Peev - Chairman of NGO “Nessebar Public Council”, city of Nessebar, regarding a request for an inspection under Art. 192 of the CHA of the site: Southern yacht port and ensemble of buildings with a flat roof, Land Plot 51500.501.454 under the Cadastral map and cadastral registers of the city of Nessebar. The “Marina Nessebar” yacht port is located in the water area of the southern bay of the city of Nessebar, located on the southern side of the isthmus connecting the old and new towns of Nessebar. The harbour includes the area of an existing quay wall and a complex of hydraulic floating facilities. The existing quay wall was built in the late 1970s in newly acquired port areas in the south-western part of the peninsula of the Ancient city of Nessebar, as part of the State Enterprise “Black Sea Fishing” - Burgas, and currently forms part of the land plot with identifier 51500.501.468 on the Cadastral map and cadastral registers of the city of Nessebar. The complex of hydrotechnical floating devices is a group of non-self-propelled floating reinforced concrete pontoons and reinforced concrete caissons, located in the eastern part of the southern bay and south-west of the Land Plot with identifier 51500.501.468, according to the scheme for the deployment of floating facilities, approved by the Directorate “Maritime Administration” - Burgas by letters No 756/18.05.2009, No 1088/30.06.2009 and No 117/27.03.2012. The group consists of three pieces of non-self-propelled floating reinforced concrete pontoons forming the main frame of the closed part of the harbour and three pieces of reinforced concrete caissons, all arranged in an orthogonal configuration resembling a partially closed rectangle with orientation along the long axis perpendicular to the existing quay wall in the Land Plot with identifier 51500.501.468. The marina mooring pontoons are two: Pontoon A on the southeast side - constructed of a single non-self-propelled floating pontoon and Pontoon B on the northwest side and approximately 75 m from Pontoon A - constructed of two longitudinally connected non-self-propelled floating pontoons. The three reinforced concrete caissons connected longitudinally are placed in front of the south-western face of pontoon B and “T”-shaped in relation to it and at a distance of 32 m from pontoon A, partially closing the harbour contour and forming the entrance for vessels. The positioning of the non-self-propelled pontoons was carried out using dead anchors and chains. The dead anchors are massive reinforced concrete elements and are located on the seabed



immediately below the pontoons. By means of connecting chains, the pontoons are attached to the dead anchors and fixed in place, and by means of filling special compartments in them with water, the floating structures are submerged and rest on the anchors. The caissons are positioned by filling their inner cells and lying on the seabed. Pedestrian and vehicular access to the hydraulic structures is via a concrete ramp entrance from Land Plot with identifier 51500.501.468 to Pontoon A, and pedestrian access from the west end of the pier wall at Land Plot 51500.501.468 via a walkway to the same pontoon. The connection between Pontoons A and B is via floating pontoon walkways framing the seaward southwestern contour of Land Plot with identifier 51500.501.468. The height of the pier frontage on the northwest of Pontoon A and southeast and northwest of Pontoon B is reduced by the installation of additional prefabricated floating pontoons with concrete and polyethylene floats designed for vessel moorage and equipped with cleats and service stations for power and water. At present, the total length of the pier front of the marina is 480 (four hundred and eighty) metres, of which 360 (three hundred and sixty) are formed by floating hydraulic harbour structures serving as a link between the ship and the shore. During the inspection, it was noted that a group of buildings had been erected on pontoon B at various stages of completion, and that finishing work had been carried out on the paving and fitting out of the same pontoon. The structures are located along the longitudinal axis of the south-western of the pair of linked non-self-propelled floating pontoons forming pontoon B of the marina. The first building is located in the central part of pontoon B, measuring approximately 8.5/10 m, with the construction works completed, and is a two-storey building of modern design and administrative and service functions, with a dissected volume and pitched single-pitched roofs and facades clad with white etalbond panels. Adjacent to and to the south-west of the first building is a second building which is single storey, approximately 8/13.5m in height, of metal frame construction, with service and storage rooms and a usable flat roof-terrace with a boarded horizontal timber element and an openwork metal parapet. The building is at the stage of finishing and fitting out. A third building, approximately 8/25m in size, with metal frame construction, with service and storage rooms and a flat roof with horizontal timber boarding, is being constructed 6m away and to the south-west. The building is at the stage of finishing works. On top of the third of the caissons located at the entrance to the marina basin, two relocatable office containers measuring 6/12 m are placed. On pontoon A a relocatable office container measuring 3/6 m is located, as well as a tank with a fuel pump for refuelling marine vessels. During the inspection it was found that no documentation concerning the Marina Nessebar yacht port was kept in the Nessebar Municipality. During the meeting and discussion with the officials responsible for the site, Mr. Nikolay Georgiev - Administrative Director and Mr. Rosen Stefanov - Manager, no documentation was presented - a scheme for the placement of floating facilities or a specialized detailed spatial plan for the marina, as well as approved schemes, plans and opinions on the buildings to be constructed on pontoon B, stating that this information is available at the Executive Agency "Maritime Administration" and the Directorate "Maritime Administration - Burgas". When comparing the actual location of the hydraulic structures of the Marina Nessebar with their image on the Google Earth satellite image of September 2018, no change was found. At the same time, it is impossible to draw an indisputable conclusion without a comparison with the scheme for the location of the floating facilities of Marina Nessebar yacht port, approved by the Directorate "Maritime Administration - Burgas" by letters No 756/18.05.2009, No 1088/30.06.2009 and No 117/27.03.2012. According to the Google Earth satellite images, the construction of the buildings on pontoon B started before October 2020, by which time the presence of building 1 was registered, and by June 2022 buildings 2 and 3 were also visible.

From further documentary inspection, analysis of the information collected and comparison

with the factual situation established by the on-site inspection, the following was found:

Regarding the schemes for the placement of hydraulic structures (pontoons) in the water area of the port:

By letter No. 837/30.05.2009, No. 1088/30.06.2009, coordinated scheme dated 26.10.2010 and by letter No. 117/27.03.2012, the Directorate “Maritime Administration” - Burgas has successively approved a scheme for the deployment of floating facilities in the water area of the Marina Nessebar yacht port. The attached to the Letter No 117/27.03.2012 of the Directorate “Maritime Administration” - Burgas scheme for the deployment of floating structures (Reinforced Concrete workshops) in the water area of the marina “Black Sea Fishing” Nessebar, summarized in the text of the letter: “I do not object to the pontoons (Reinforced Concrete workshops) to be anchored according to the attached scheme” was not presented during the inspection. Therefore, it is not possible to compare and contrast the location of the floating structures (Reinforced Concrete workshops) envisaged in the scheme with their actual location, type and number at the present time. Pursuant to § 4(2) of the Transitional and Final Provisions of Ordinance No 9 of 2013 on the Operational Safety Requirements for Ports and Specialised Port Facilities (promulgated by SG. No. 96 of 2013, amended, issue 85 of 2017, supplemented, issue 103 of 2017), the deployment of new floating hydraulic engineering structures in the ports referred to in para. 1 shall be allowed in accordance with the provisions of a General plan (respectively a detailed spatial plan), which has entered into force and which has been prepared and approved in accordance with the requirements of the Maritime Spaces, Inland Waterways and Ports of the Republic of Bulgaria Act (MSIWPRBA). Therefore, after 5.11.2013, any deployment of new floating hydraulic structures in the water area of Marina Nessebar yacht port should be carried out in accordance with the provisions of a specialised detailed spatial plan, including a plot plan for the harbour water area, prepared and approved in accordance with the requirements of the MSIWPRBA. The draft plot plan for the harbour water area of the Marina Nessebar yacht port, reflecting the current situation, submitted by the Ministry of Transport and Communications by Letter No. 94-00-995/19.10.2023 of the MoC, was prepared in September 2017 and has not been processed so far. Therefore, for the period from 27.03.2012 to the present moment, no reasonable conclusion can be drawn regarding the number, type and location of the floating hydraulic structures in the Marina Nessebar yacht port water area, their compliance with the provisions in the attached to Letter No 117/27.03.2012. of the Directorate “Maritime Administration” - Burgas scheme for placement of floating facilities (Reinforced Concrete workshops) in the water area of the yacht port “Black Sea Fishing” Nessebar, as well as compliance with the requirements of § 4, para. 2 of the Transitional and Final Provisions of Regulation No. 9 of 2013 on the requirements for the operational suitability of ports and specialized port facilities.

According to the Letter No. 33-00-237/30.04.2018 of the MoC, from the Directorate “Maritime Administration” - Burgas, as of 30.04.2018, the total length of the quay front of the Marina Nessebar yacht port is 480 m, 360 m of which are formed by floating hydraulic structures serving as a connection between the ship and the shore. At the same time, according to the Letter No. 94-00-995/19.10.2023 of the MoC from the Ministry of Transport and Communications, as of 16.12.2022 the total length of the quay front of Marina Nessebar yacht port is 576,95 m, including the floating hydraulic structures serving for the connection between the ship and the shore. Therefore, between 30.04.2018 and 16.12.2022, there has been a change in the total length of the quay front of Marina Nessebar yacht port in the amount of 96,95 m, while during the described period there have been no agreed changes in the scheme for the placement of the floating structures in the water area of Marina Nessebar yacht port, as well as no agreed changes in the length and configuration of the existing quay wall in the Land Plot with identifier 51500.501.468.

Regarding the completed reconstruction of the above-water part of a non-self-propelled pontoon BC 330 - Reg. No. 61449:

According to the provided copies of the available documentation for “Reconstruction of the above-water part of a non-self-propelled pontoon BC 330 - Reg. No. 61449 of 2017”, the front sheet of the “List of documents”, the front sheet of the “Explanatory note” of the text part of the documentation and the drawing “General arrangement” - sheet 1 are stamped only: “Bulgarian Register of Shipping, Accepted for information on 20.10.2017” with an illegible signature, without mentioning the name and position and the number of the document on the basis of which the documentation was agreed or approved. At the same time, from the documentation for “Reconstruction of the above-water part of a non-self-propelled pontoon BC 330 - Reg. No. 61449 of 2017”, for the purpose of this inspection, the documents Explanatory note and drawing Anchoring situation were not provided by the Directorate “Maritime Administration” - Burgas.

According to the drawing “General arrangement” - sheet 1 of the documentation for the “Reconstruction of the above-water part of a non-self-propelled pontoon BC 330 - Reg. No. 61449”, on the deck of the existing pontoon is planned the construction of separate premises with a specific purpose: office - 2 pcs., restaurant - 7 pcs. and sanitary facilities. The graphical representation of the drawing “General arrangement” - sheet 1, is a plan view and side view of the non-self-propelled pontoon BC 330 at a scale of 1:170, marked overall dimensions between the corners of the newly proposed buildings, the distances to the pontoon sides and the height of the buildings. The “General arrangement” document, sheet 2 of the “Reconstruction of the above-water part of a non-self-propelled pontoon BC 330 - Reg. No. 61449” documentation, illustrates the drawing on sheet 1 and is a three-dimensional visualisation of the intended construction of the new buildings. The “General arrangement” documents, sheets 1 and 2, as carriers of technical information, constitute a conceptual design illustrating the vision and dimensions of the new buildings, their positioning on the pontoon deck, their functional purpose, their height and their architectural and artistic image. At the same time, they do not clarify the structural design, the technical building installations, the optimal and safe provision of the sanitary and hygiene standards and the microclimate of the premises required for the intended functional use. Therefore, the documents “General arrangement” - sheet 1 and 2 of the documentation for the “Reconstruction of the above-water part of a non-self-propelled pontoon BC 330 - Reg. No. 61449” do not constitute a valid technical design certified by an authorized state control body in the design and construction / construction of buildings and premises with public access.

According to the document Opinion of the Bulgarian Register of Shipping No 32-2/09.07.2018, the same was issued on the Approval of the technical documentation on the stability and strength of the hull of the pontoon BC-330, while in the text part of the document it is written: “the stability and strength of the pontoon with a load - a fuel tanker (32 t.), on the deck, meet the requirements of the Regulations of the Bulgarian Shipping Register for the safe operation of the vessel tied to the shore, during all stages of the station's loading, considered as “special equipment”, i.e. semantically the text is relevant to the technical documentation on the stability and strength of the hull of the pontoon BC-331, which is equipped with a modular station for light fuels.

Regarding the adjacent water area of the Marina Nessebar yacht port:

The adjacent water area of the Marina Nessebar yacht port falls within the scope of buffer zone “B” in the water area of the peninsula of the Ancient City of Nessebar, inscribed on the UNESCO World Heritage List. By Order No. PD9P-14 of 5 June 2015 of the Minister of Culture, promulgated in State Gazette No. 51 of 2015, Regimes for the conservation of the group immovable cultural property “The Ancient City of Nessebar” - “archaeological reserve and historical settlement -

architectural, structural and urban immovable cultural property of global and national importance” were adopted. According to the adopted regimes for buffer zone “B” in the water area of the peninsula the following is required:

- All types of activities in the buffer zone of the aquatic area shall be coordinated with the MoC on the basis of the opinion of the Centre for Underwater Archaeology (CUA);

- All types of hydraulic engineering and dredging activities shall be coordinated with MoC following the opinion of the CUA and shall be preceded by mandatory archaeological site searches, the implementation of approved activities shall be carried out in archaeological monitoring mode and, if necessary, underwater rescue archaeological investigations shall be carried out;

- Underwater blasting, dredging, clam trawling, bottom trawling, construction of dikes, construction of buoys, dumping of earth masses into the sea and other activities leading to alteration of the seabed and endangering archaeological remains are prohibited.

- Underwater archaeological investigations are funded and carried out on the basis of a unified strategy and methodology, prepared by the CUA, with the aim of identifying, locating, documenting and preserving sites underwater in their integral entirety, as a constituent element of the historic settlement;

- Access to archaeological sites underwater is carried out in accordance with the provisions of Regulation No. H-7 of 12.06.2008 on the performance of diving and other underwater activities.

Up to now, no reasonable conclusion can be made regarding the number, type and location of the floating hydraulic structures in the water area of the Marina Nessebar, their compliance with the provisions in the attached to the Letter No. 117/27.03.2012. of the Directorate “Maritime Administration” - Burgas scheme for the placement of floating structures (Reinforced Concrete workshops) in the water area of the marina “Black Sea Fishing” Nessebar, as well as whether after the date 5.06.2015 new activities have been carried out on the placement of floating hydraulic structures requiring hydraulic engineering and/or dredging activities.

The Executive Director of the Executive Agency “Maritime Administration”, on the basis of Art. 115k, para. 2, of the MSIWPRBA and in accordance with the powers granted to him, is directed to order a documentary and on-site inspection, as appropriate, of the Marina Nessebar yact port on compliance with the requirements of § 4, para. 2 of the Transitional and Final Provisions of Regulation No. 9 of 201 for the requirements for operational suitability of ports and specialized port facilities, as well as an inspection of the ongoing reconstruction of the above-water part of a non-self-propelled pontoon BC 330 – Reg. No. 614469, and the Executive Director of the Executive Agency “Maritime Administration” should notify the DG IPCH at the MoC of the results of the inspection and the subsequent actions taken.

**Sincerely**

**ALEXANDER TRAYKOV**

*Director General of DG IPCH*



## ANNEX 6:

### *Opinion No. ST-84-417 dated 29.01.2024 of the Ministry of Culture (for the hotel with the built-in mill)*

Ext. № CT-84-417/ 29. 01. 2024

#### **MINISTRY OF CULTURE**

On the basis of Art. 84, para. 1 and para. 2, in conjunction with Art. 83 of the Cultural Heritage Act (CHA), in conjunction with Order No. ПД09-520/29.06.2023 of the Minister of Culture, Applications to the National Institute for Immovable Cultural Heritage (NIICH) with Incoming Ref. No. 9400-5250/01.04.2022, 9400-5250/05.05.2022, 9400-2535[5]/14.07.2023, 9400-5250[26]/03.08.2023, 9400-5250[27]/17.08.2023, in connection with Outgoing Ref. No. 9400-5250/11.05.2022, 9400-5250/05.07.2023, 9400-5250[29]/21.09.2023, Incoming Ref. No. 7000-3953[3]/18.09.2023, 9100-1368/12.10.2023 of NIICH, Statement of NIICH with Ref. No. 9400-5250/17.10.2023 and opened files with the Ministry of Culture No. CT-84-417/05.07.2022 and CT-84-417/19.10.2023.

#### **STATEMENT**

Subject: Design visa for “Reconstruction, redevelopment and major renovations - scope reduction, re-facade and pitched roof with terraced indents, of a hotel - building with identifier 51500.502.313.4 along mandatory building lines and with a reduction in building height”, Volumetric-planning study and Investment project for the site: “Reconstruction, scope reduction, major renovation of the facade and pitched roof with terraced indents of a legally constructed hotel - building with identifier 51500.502.313.4, Land Plot with identifier 51500.502.313 according to the Cadastral map and cadastral registers (CMCR) of the city of Nessebar, RLP VIII-639 for a hotel, restaurant and disco, quadrant 54 according to the plan of the city of Nessebar, Nessebar municipality, Burgas region; 1 Lyuben Karavelov Str.; parts: Architectural and Structural; phase: Technical design (TD)

**Applicant:** BHR Ltd., 8230 Nessebar, 25 Ivan Vazov Str., represented by Vanya Filipova, Manager

**Identification data for the subject of the documentation:** Building with identifier 51500.502.313.4 according to the Cadastral map and cadastral registers of the city of Nessebar, Land Plot 51500.502.313, RLP VIII-639 “for hotel, restaurant and disco”, quadrant 54 according to the plan of the city of Nessebar, 1 Lyuben Karavelov Str., Nessebar Municipality, Burgas Region

#### **Site Status:**

According to the data from the National Public Register of Immovable Cultural Properties kept in the NIICH, containing all acts until the entry into force of the Cultural Heritage Act (CHA) (published in the State Gazette, issue 19 of 13.03.2009, as amended and supplemented), the status of the sites as immovable cultural monuments (immovable cultural properties within the meaning of Art. 59, para. 4 of the CHA, §10, para. 1 and § 12, para. 1 of the Transitional and Final Provisions of the CHA), and all acts under Art. 58, para. 1, Art. 62, para. 1 and 2 and Art. 65, para. 1 of the same law, in the Land Plot with identifier 51500.502.313 on the CMCR of the city of Nessebar, RLP VIII-639 for hotel, restaurant and disco, quadrant 54 according to the plan of the city of Nessebar, there is no data on sites with the status of single immovable cultural properties.

#### **Status of the area in which the site falls:**

Land Plot with identifier 51500.502.313 on the CMCR of the city of Nessebar falls within the buffer zone “A” of the group immovable cultural property (GICP) “Ancient City of

Nessebar”, with category “world and national importance”, declared by Decree No. 243 of 18.07.1956 of the Council of Ministers (CoM) for architectural-urban and archaeological reserve; with the status of archaeological reserve, as included under No. 2 according to the Annex to Art. 50, para. 3 of the CHA - List of Archaeological Reserves with the category of “national importance”, which are of exceptional value for the culture and history of the country; “Archaeological Reserve and Historical Settlement” - architectural, structural and urban immovable cultural property according to Order No. ПД9P -14/05.06.2015 of the Minister of Culture (SG No. 51 of 07.07.2015), and inscribed on the List of World Heritage Sites at the VII Ordinary Session of the UNESCO World Heritage Committee, December 1983 - City of Florence, Republic of Italy.

The property falls within the territorial scope of the archaeological immovable cultural property (AICP) “Necropolis of Messambria-Mesembria”, proposed by the Protocol of 07.08.2012 of the on-site commission, appointed by Order No. ПД9K-157/31.07.2012 of the Minister of Culture, and adopted by Protocol No. 33 of 29.10.2012 of the Specialized Expert Council for the Preservation of Immovable Cultural Property (SECPICP), approved by the Minister of Culture, and with additions approved by Protocol No. 101 of 19-20.12.2022 of the SECPICP, approved by the Minister of Culture (the procedure has not been completed). The immovable archaeological sites in the territory of the “Necropolis of Mesambria-Mesembria” have the status of cultural heritage sites with the category of “national importance” until their establishment under the CHA.

The land plot does not fall within the buffer zone of an announced or declared single immovable cultural property, according to Art. 79, para. 4 of the CHA.

#### **Conservation regimes:**

There are defined conservation regimes - territorial scope, boundaries and prescriptions of the GICP “Ancient City of Nessebar” - “Archaeological Reserve and Historical Settlement - Architectural, Construction and Urban Immovable Cultural Property of World and National Importance”, which were approved by Order No. ПД9P -14/05.06.2015 of the Minister of Culture.

The prescriptions for the conservation of the immovable cultural property “Ancient City of Nessebar” and its buffer zone define a common approach through:

- *“...Creation of conditions for sustainable development of the territory of the property in adherence to its three principles: economic development, social balance and environmental protection (including cultural heritage) defined in the UN and CoE sustainable development documents...”*;

- *“...the conservation of immovable cultural property and the effective realisation of its role as a factor of sustainability can be realised in coordination with spatial planning” and others.*

For the buffer zone and specifically for the part of the new town - zone “A”, prescriptions for conservation are defined:

- *“...development is required to be free-standing, low density, and horizontally arranged on the site so as to be consistent with the traditional development characteristics of the property and to provide for the preservation of the cultural landscape, including views to the property...”*

- *“...The Chief Architect of the city of Nessebar shall notify the Museum “Ancient Nessebar” in writing of the approved spatial development plans and the issued design visas and permits for construction on the territory...”*;

- *... a reduced building is permissible - terraced on the natural relief (with 2 to 4 floors above ground), which would preserve the visual connection between the mainland and the peninsula and make the transition to the realized massive building. The development should provide the opportunity to expose the cists in groups that include both preserved in situ and single stone structures in good physical condition and with a specific typological affiliation, in compliance with the provisions of Art. 169, para. 2 of the CHA....*

*- ... Reduction of the scope of the hotel in which the mill is built is required - reducing the height and freeing up space around and above the mill.... ”.*

The conservation regimes - territorial scope, boundaries and prescriptions, of the AICP “Necropolis of Mesambria-Mesembria” were proposed by the Protocol of 07.08.2012 of the on-site committee appointed by Order No. ПД9К -157/31.07.2012 of the Minister of Culture, and were adopted by Protocol No. 33 of 29.10.2012 of the meeting of the SECPICP, approved by the Minister of Culture, and with the additions approved by Protocol No. 101 of 19-20.12.2022 of the SECPICP, approved by the Minister of Culture (the procedure has not been completed).

**Archive data:**

The National Documentary Archive (NDA) of the NIICH does not keep archival data on discovered archaeological properties or finds and there is no data on the presence of archaeological sites within the boundaries of the Land Plot with identifier 51500.502.313 on the CMCR of the city of Nessebar, RLP VIII-639 for a hotel, restaurant and disco, quadrant 54 according to the plan of the city of Nessebar.

By Statements No. 10221/10.09.2003, No. 4690/05.01.2005 of NICM the coordination of a sketch with a visa and an architectural technical project for a hotel with dining and entertainment facilities “Windmill” in RLP VIII-639, quadrant 54, city of Nessebar was refused and restrictions are placed on the design of the site.

By letter No. 10042/06.12.2005 of NICM for the Architectural detailed design for the hotel complex “Menabria” in the RLP VIII-639, quadrant 54, city of Nessebar, the conditions for the archaeological survey of the site intended for construction and the procedure after its completion are set, the project documentation being in accordance with it and with the restrictions presented in the previous letters.

By the Statement No. 33-00-0193/18.06.2010 of the Ministry of Culture, the coordination of the sketch with a visa for the preparation of the CIP - project for the DSP-RDP and investment project for the reconstruction and extension of the existing building - hotel “Menabria” in the RLP VIII-639, quadrant 54 (Land Plot with identifier 51500.502.313) on the plan of the city of Nessebar was refused.

By Statement No. 33-00-0193/20.04.2012 of the Ministry of Culture, a sketch with a visa “For research and design of the reconstruction of existing premises and a swimming pool below the average level of the adjacent terrain for the separation of a kitchen and a hall serving public catering establishments of the “Melnitsata” hotel and research and design of a change in the scope of the existing building in order to ensure an adequate environment for the existing mill with a view to its subsequent inclusion in the list of cultural monuments of local importance in RLP VIII-639, quadrant 54 (51500.502.313) according to the plan of the city of Nessebar, taking into account the future design task with the listed restrictions and requirements.

By Statement No. 33-HH-614/02.12.2019 of the Ministry of Culture, the approval of the Vision and technical assignment for the reconstruction and re-facade of the existing hotel in RLP VIII-639, quadrant 54 according to the plan of the city of Nessebar, with identifier under the approved Cadastral map – Land Plot 51500.502.313.4, 1 Lyuben Karavelov Str., with the requirement “to comply with the requirement in item 3.4.2 for the buffer zone A of the Prescriptions for the conservation of the immovable cultural property “Ancient City of Nessebar”, approved by Order No. ПД9П -14 of 5 June 2015 of the Minister of Culture and promulgated in State Gazette No. 51 of 2015, namely: “Reduction of the scope of the hotel, in which the mill is integrated - reduction of the height and freeing of space around and above the mill”, is required before undertaking new investment initiatives”.

By letter No. 9400-5250/04.06.2020 of NIICH an objection to the refusal of the coordination of the Visa and technical assignment for the reconstruction and re-facing of the existing hotel in RLP VIII-639, quadrant 54 on the plan of the city of Nessebar, with identifier under the approved Cadastral map – land Plot 51500.502.313.4, 1 Lyuben Karavelov Str. was answered.

By Statement No. 33-HH-614(20)/04.03.2021 of the Ministry of Culture, the coordination of the Design Visa and Investment Project for reconstruction, re-facing and replacement of the flat roof with a pitched roof, without change of height of the existing hotel with identifier 51500.502.313.4 on the Cadastral map, in RLP VIII-639, quadrant 54 on the plan of the city of Nessebar, Land Plot with identifier 51500.502.313 on the Cadastral map, 1 Lyuben Karavelov Str., city of Nessebar. Parts: Architecture and Geodesy; phase: Technical design (TD) was refused on the grounds that they were prepared in non-compliance with the regimes and regulations for the conservation of the “Ancient City of Nessebar” and Ordinance No. 4 of 21.05.2001 on the scope and content of investment projects and the above-mentioned omissions and inconsistencies.

By the Constitutive protocol of 22-23.04.2021 of the Regional Inspectorate for Cultural Heritage Protection - South-Eastern Region (RICHP-SER), Ref. No. 24-00-77/29.04.2021 of the Ministry of Culture, it was established that construction works were carried out on an existing building with identifier 51500.502.313.4 on the CMCR of the city of Nessebar, with location in the Land Plot with identifier 51500.502.313 on the CMCR of the city of Nessebar, RLP VIII-639 for hotel, restaurant and discotheque, quadrant 54, city of Nessebar, including dismantling works, repair concrete and installation works on facades - terraces, facade elements, etc., and elevator shaft in the building scope.

By Protocol No. 99-2 of the SECPICP, Reg. No. IIP-48/02.09.2022 of the Ministry of Culture, under item 3, it was decided to propose to the Minister of Culture to issue a negative statement in connection with the Design Visa for “Reconstruction, redevelopment and major renovation - scope reduction, re-facing and pitched roof with terraced indents, of the hotel - building with identifier 51500.502.313.4 along mandatory building lines and with reduction of the building height”, Volumetric Spatial Development Study and Investment Project for the site: “Reconstruction, scope reduction, major renovation of the facade and pitched roof with terraced indents of a built hotel - building with identifier 51500.502.313.4 located on a land plot with identifier 51500.502.313 under the CMCR of the city of Nessebar, RLP VIII - 639 for a hotel, restaurant, disco, quadrant 54, 1 Lyuben Karavelov Str., city of Nessebar, municipality of Nessebar, region of Burgas”, parts: Architectural, Architectural survey, Structural, Electrical, Plumbing; phase: Technical design (TD), with the following motives:

- *There is no coordinated General Spatial Plan for the territory under the CHA, reflecting immovable cultural properties.*
- *There is no Detailed Spatial Plan agreed for the territory under the CHA.*
- *The Design Visa does not reflect the intended construction in the adjacent properties and the parameters of construction, in accordance with the requirements of Art. 140, para. 2 of the SPA.*
- *The Design Visa has not been issued with mandatory building lines according to Art. 140, para. 4 of the SPA.*
- *The activities envisaged in the Investment Project do not fully comply with the Design Visa.*
- *The area around the mill has not been cleared according to the prescriptions for the conservation of the “Ancient City of Nessebar”, adopted by Order No. PД9P-14/05.06.2015 of the Minister of Culture.*
- *The project is developed in non-compliance with the regimes and prescriptions for the conservation of the “Ancient City of Nessebar” and Ordinance No. 4 of 21.05.2001 on the scope and content of investment projects.*

and with the following requirements:

- *An inter-institutional committee of specialists to carry out an on-site inspection in order to clarify the facts of the interventions made during the reconstructions in 2021 and whether any archaeological structures were affected during them.*
- *With the subsequent submission of project documentation, the approved projects by the Municipality of Nessebar, on the basis of which the construction was carried out and the building permit was issued, shall be submitted.*
- *If the investment projects approved under the SPA are not available in the archives of Nessebar Municipality or the owner, they should be recovered under Art. 145, para. 5 of the SPA and submitted to the Ministry of Culture and the NIICH.*

The 2023 Report of the Joint World Heritage Centre/ICOMOS Reactive Monitoring Mission of 16-20 January 2023 to the World Heritage Site of the Ancient City of Nessebar establishes the progress made by the Republic of Bulgaria in the implementation of Decision No. 44 COM 7B.154 of the World Heritage Committee (Fuzhou, People's Republic of China / online meeting of 2021) and the recommendations of the Joint Mission of 22-26 October 2018 for the reactive monitoring of the World Heritage Committee / ICOMOS, as well as assessing the overall conservation status of the property and compliance with the criteria for inscription on the List of World Heritage in Danger, in accordance with § 179 of the Operational Guidelines for the Implementation of the Convention concerning the Protection of the World Cultural and Natural Heritage ratified on 07.03.1974.

It is concluded that the state of conservation of the property is influenced by a number of negative factors that represent identified and potential threats to the outstanding value of the cultural property, and which threaten its authenticity and integrity. The attributes that defined the Outstanding Universal Value (OUV) of the cultural property at the time of inscription have deteriorated and in some respects eroded beyond recovery. The State Party has not submitted a Conservation and Management Plan (CMP) for the property, a Detailed Development Plan and an Overall Development Plan. Item 9 is included in the “List of Recommendations” contained in the 2023 Report. *“Exploring the feasibility of re-acquiring the parcel with the hotel construction-in-progress and its subsequent removal to create an uninterrupted view from the necropolis to the peninsula....”*.

In the subsequent Decision No. 45 COM 7B.179 of the Session of the World Heritage Committee (Riyadh, Kingdom of Saudi Arabia, 10-29.10.2023), under the reference No. 9100-1368/12.10.2023 of the NIICH, the progress achieved in the conservation of the World Heritage property “Ancient City of Nessebar” regarding the implementation of the previous decisions and recommendations was noted. At the same time, it is noted with concern that some issues remain unresolved; and some of the features that underpin the Outstanding Universal Value/OUV of the site have deteriorated. Implementation of spatial planning actions that are essential for adequate protection and management of the cultural property is identified, and finalization of a Conservation and Management Plan (CMP) is encouraged following the organization of a series of consultation missions. In order to protect the outstanding cultural significance of the site for the present and future generations of all mankind, it is encouraged and required to:

- update the August 2021 Plan for the Integrated Development of the Municipality of Nessebar for 2021-2027, in light of the vision to improve Outstanding Universal Value (OUV) and the strategy to expand the focus beyond tourism, as a mono-economy;
- endorsement and integrated implementation of the CMP in the overall spatial planning of the area with the participation of the local community and civil society, and based on the principles of the UNESCO Recommendation on Historic Urban Landscape (2011) and the ICOMOS International Charter for Heritage Tourism (2022);
- approval and implementation of the General Spatial Plan (GSP) of the city of Nessebar and subsequently of the Detailed Spatial Plan (DSP) of the “Ancient City of Nessebar”,



in compliance with the established regimes for the conservation of the immovable cultural property;

- implementation of the recommendations of the 2023 Joint Mission on Reactive Monitoring and the 2018 Joint Mission on Reactive Monitoring.

Decision No. 45 COM 7B.179 also requires the submission by 01.12.2024 of the specific results of the activities carried out related to the conservation of cultural heritage.

**Findings and evaluations:**

The documentation submitted shall be subject to the provisions of Art. 83, para. 1, item 1, letter “a” and Art. 83 para. 1, item 2, letter “a” of the Cultural Heritage Act (CHA).

The file contains Design Visa No. 097 dated 31.03.2022 of the Chief Architect of the Municipality of Nessebar for “Reconstruction, redevelopment and major renovations - scope reduction, re-facade and pitched roof with terraced indents, of a hotel - building with identifier 51500.502.313.4 according to the CMCR of the city of Nessebar, along mandatory building lines and with a reduction in building height”, Volumetric Spatial Development Study of January 2022 and Investment Project of 2022 for the site “Reconstruction, scope reduction, major renovation of the facade and pitched roof with terraced indents of a legally constructed hotel - building with identifier 51500.502.313.4 on the CMCR of the city of Nessebar”, with location in the Land Plot with identifier 51500.502.313 on the CMCR of the city of Nessebar, RLP VIII 639 for hotel, restaurant and disco, quadrant 54 of the plan of the city of Nessebar, in the phase of Technical design in parts Architectural with architectural survey, and Structural.

Attached are the documents of ownership: the Deed of Incorporation dated 20.01.2011 for the establishment of BHR LTD., Consent of 20.01.2011 for a contribution in kind to the capital of BHR LTD., and a sketch dated 02.03.2022 of the Geodesy, Cartography and Cadastre Service - Burgas for the land plot. Also submitted are: a combined sketch dated April 2022 of SVETGEO LTD., Sofia, a status certificate dated 19.08.2021 of NIICH, notification letter No. H2 YT 2436/29.04.2022 of Nessebar Municipality, certified copies of Use Permit No. CT-05-249 dated 25.02.2010 of the Ministry of Regional Development and Public Works, Directorate for National Construction Control (DNCC) for the construction of “Hotel “Menabria” - reworking and renovation of completed construction and LV cables”, Protocol under Annex No. 16 of 23.02.2010 of the State Acceptance Commission (SAC) for establishing the suitability for use of the construction “Hotel “Menabria” - reworking and renovation of completed construction and LV cables”, Building Permit No. 128 of 08.12.2005 of the Chief Architect of Nessebar Municipality with a remark under Art. 154 of the Spatial Planning Act (SPA) of the Chief Architect of Nessebar Municipality after the approved project, Project of February 2008 for revision in the phase of technical design on the part Architectural, approved on 09.04.2008 by the Chief Architect of Nessebar Municipality, Contract of 28.12.2008 with Elektrodistribution Stara Zagora AD for connection of consumer sites to the electricity distribution network, Contract No. 204055 of 11.02.2010 with Water Supply and Sewerage EAD, Burgas for the supply of drinking water, wastewater disposal and treatment, Statement of 2022 on the part of Electrical (regarding building diversions/connection to networks), photo documentation of 7 pages, visuals of 3 pages, notarized power of attorney, and electronic/digital media with record of documentation - 3 pieces.

Certified copies have been provided by the Municipality of Nessebar of the documents concerning the spatial development plans for RLP VIII-639 for hotel, restaurant and disco, quadrant 54 and for the adjacent land plots as follows: Draft of 1995 for Partial Amendment of the Development and Regulation Plan (PADRP) of quadrant 103 and quadrant 104 (new quadrant 54 and quadrant 62) according to the plan of the city of Nessebar; Order No. 11 of 11.01.1995 of the Mayor of Nessebar Municipality for approval of the DRP of quadrant 103 and quadrant 104 according to the plan of the city of Nessebar; Draft of 2000 for Partial Amendment of the Development and Regulation Plan of quadrant 54 according to the plan of the city of

Nessebar; Order No. 30 of 13.04.2000 of the Mayor of Nessebar Municipality for approval of Partial Amendment of the Development and Regulation Plan (PADRP) of quadrant 54 according to the plan of the city of Nessebar; Draft from 2004 for Partial Amendment of the Detailed Spatial Plan – Regulation and Development Plan (PSP-RDP) for RLP XI 802 for residential areas and RLP IV municipality, quadrant 54 according to the plan of the city of Nessebar; Order No. 408 of 19.07.2004 of the Mayor of Nessebar Municipality for approval of Partial Amendment of the DSP-RDP for RLP XI 802 for residential areas and RLP IV municipality, quadrant 54 according to the plan of the city of Nessebar; Draft from 2004 for Partial Amendment of the Detailed Spatial Plan – Regulation Plan (DSP-RP) for RLP I, RLP VIII and RLP IX in quadrant 54 according to the plan of the city of Nessebar; Order No. 627 of 09.09.2004 of the Mayor of Nessebar Municipality for approval of Partial Amendment to the Detailed Spatial Plan – Regulation and Development Plan (DSP-RDP) of RLP I municipality, quadrant 54 of the plan of the city of Nessebar; Draft from 2005 for Partial Amendment to the Detailed Spatial Plan – Regulation and Development Plan (DSP-RDP) of RLP I municipality, quadrant 54 of the plan of the city of Nessebar; Order No. 663 of 27.06.2005 of the Mayor of Nessebar Municipality for approval of Partial Amendment to the Detailed Spatial Plan – Regulation and Development Plan (DSP-RDP) of RLP I municipality, quadrant 54 of the plan of the city of Nessebar.

Attached are certified copies of documents of various competent authorities concerning the existing building on the site of Hotel “Menabria - reworking and renovation of completed construction and LV cables” with location in the land plot with identifier 51500.502.313 on the CMCR of the city of Nessebar. RLP VIII 639 for a hotel, restaurant and disco, quadrant 54 according to the plan of the city of Nessebar and subsequent interventions: Decree No. 7912/07 of 28.04.2011 of the Regional Prosecutor's Office of Burgas for termination of criminal proceedings concerning the issuance of a building permit for the hotel complex “Menabria”, Constative Act No. 2 of 22.04.2021 of the RDNCC-Burgas for construction “Reconstruction, redevelopment and major renovations of the Menabria Hotel”, Order No. ДК -09-B-2 dated 19.07.2021 of the head of RDNCC-Burgas for construction “Reconstruction, redevelopment and major renovations of the Menabria Hotel” - building with identifier 51500.502.313.4 under the CMCR of the city of Nessebar”, Act No. Б-17 dated 22.07.2021 of RDNCC-Burgas for construction “Reconstruction, redevelopment and major renovations of the Menabria Hotel” - building with identifier 51500.502.313.4 under the CMCR of the city of Nessebar”, Penal Decree No. Б-ДНЧК-3 dated 17.01.2022 of the MRDPW-DNSC, Payment Order dated 11.03.2022 of B.H.R. LTD., and Instruction Letter No. OH-456-00 211 dated 23.03.2022 of the Head of RDNCC-Burgas regarding the continuation of the construction after eliminating the reasons that led to its suspension..

Additional survey and design work has been submitted to the 2022 Investment Project for the site as follows: a July 2023 Pre-Investment Survey-Snapshot with Architectural Capture (addendum to May 2019 documentation), a July 2023 Pre-Investment Survey-Snapshot with Architectural Capture and Structural Capture (addendum to 2022 documentation), and a July 2023 Pre-Investment Survey-Snapshot with Architectural Capture and Structural Capture (addendum to 2022 documentation).), Investment Design dated July 2023 in the Technical Design phase on the Architectural part (addendum to the Explanatory Note dated 2022); Construction Opinion dated July 2023 in the Preliminary Study phase, and Conformity Assessment on the Construction part dated July 2023 by Eng. Ekaterina Papen on the Construction Opinion on the basis of Art. 142 para. 10 of the SPA.

By letter No. OH 456 00 398/17.08.2023 of the Head of RDNCC-Burgas were submitted the documents issued in the administrative proceedings for the construction “Reconstruction, redevelopment and major renovations of Hotel Menabria”. It has been certified that the issued Order No. ДК-09-Б-2/19.07.2021 of the Head of RDNCC-Burgas is being executed, and the issued Penal Decree No. Б ДНЧК-3/17.01.2022 of the MRDPW-DNSC has been paid by the

current applicant in the administrative proceedings. According to the letter No. OH-456-00 211/23.03.2022 of the Head of RDNCC-Burgas, instructions were given to continue the execution of the construction *“... after elimination of the reasons that led to its suspension, respectively the construction to be brought into compliance with the construction documents on which the Use Permit No. CT-05-249/25.02.2010 was issued. “Hotel “Menabria” - reworking and renovation of the completed construction and LV cables”, after providing investment projects coordinated with the Ministry of Culture under the CHA, or after submitting a valid building permit and coordinating investment projects with the Ministry of Culture under the terms and conditions of the CHA... for construction”* for the reconstruction, redevelopment and major renovations of the existing hotel building.

In fulfillment of the requirements of notification letter No. CT-84-417/ 23.06.2022 of the Ministry of Culture and notification letter No. 9400-5250/05.07.2023 of the NIICH, which have been duly received, with subsequent letters No. CT-84-417/30.06.2022 of the Ministry of Culture (respectively No. 9400 5250/30.06.2022 of the NIICH), and letters No. 7000-2535[5]/14.07.2023, 9400-5250 [26]/03.08.2023 and 9400-5250[27]/17.08.2023 of the NIICH, the file is fully supplemented with certified copies of documents and documentation from current studies regarding spatial development plans, investment projects, the construction and installation works carried out, and procedural and ascertainment actions for the constructed building and its subsequent operation and architectural interventions.

A comparative analysis between the May 2019 architectural capturing and the February 2008 design documents approved on April 9, 2008 has been prepared in the supplemental architectural rendering submitted (Addendum to May 2019 Documentation), in the phase of Technical design of the constructed building of a hotel with dining and other service facilities, which was put into operation with the Use Permit No. CT-05-249/25.02.2010 of the Ministry of Regional Development and Public Works DNSC under the issued Decree No. 7912/07/28.04.2011 of the Regional Prosecutor's Office-Burgas. On the basis of empirical analysis of the available graphic materials, applying the theoretical method of the systematic structural analysis, a conclusion was formulated that *“...the two project documents are in compliance within the meaning of the SPA in terms of the main architectural and planning solutions and building-structural systems and elements, as there are no discrepancies in the scope of material deviations...”*.

The July 2023 architectural capturing and structural capturing (a supplement to the 2022 documentation) and the design statement for which the compliance assessment was prepared reflect the current architectural and structural condition of the building as of July 2023, including after the construction and installation works carried out, as established by the above-mentioned Constitutive Report dated 22-23.04.2021 of the RICHP-SER, No. 24-00-77/29.04.2021 of the Ministry of Culture, and Constitutive Report No. 2 dated 22.04.2021 of the RICHP-SER, in relation to the original commissioning of the building. The structural elements completed in the months of March-April 2021 comply with the provisions of the investment project of 2022 on the Structural part. For the executed works on the construction site, no interference on the ground surface, the ground base, and the subsoil outside the contour of the existing foundations has been detected, which also applies to all works under the 2022 project. The construction performed in 2021 is in accordance with the project documentation for the site “Reconstruction, scope reduction, major façade and pitched roof repairs with terraced indents of a legally constructed hotel - building with identifier 51500.502.313.4 on CMCR of the city of Nessebar at the Technical design phase. The technical feasibility for the continuation of the construction of the site in compliance with the requirements of the law in accordance with the instruction letter No. OH 456 00 211 dated 23.03.2022 of the RDNCC- Burgas is substantiated.

A new Design Visa has been submitted for the reconstruction, redevelopment and major renovations - scope reduction, re-facing and pitched roof with terraced indents, of an existing lawfully constructed public service building within the “A” buffer zone of the GICP with

“World and National Importance” and within the boundary of an archaeological cultural heritage property. No development exists on the adjacent properties or across the street according to the combined sketch plan, and the proposed new development under the current spatial development plans is noted in the volumetric survey attached as an integral part of the documentation. The vision does not envisage any change to the existing type of main construction - free building, and the nature of construction - medium building. The functional purpose of the building is preserved, and the volumetric spatial solution provides for a reduction in the scope of the existing construction to four storeys, without including extensions or new construction in the regulated land plot. The Museum “Ancient Nessebar”, Nessebar, has been duly notified in writing of the issued Design Visa.

The volumetric study covers the regulated land property - subject of the design, and its adjacent properties. The current detailed spatial plan is attached for the RLP VIII 639 for hotel, restaurant and disco, quadrant 54. The purpose, manner and character of the development and the spatial development indicators shall comply with the rules and regulations for the relevant spatial development category, without changing the character and manner of development provided for by the current detailed spatial plan. The development shall be free, with lower values of building density and building intensity than the normatively determined indicators for planning and building of the land plot. The study justifies a reduction in the built-up area and maximum height of the four-storey building and its ridge heights in absolute heights, and the number of storeys in its compositional parts, as well as the specific shape and pitch of the new roofs. The height of the building's cornice (eaves) is lowered and the solution of the roofs with terraced indents is in accordance with the visual identity of the area.

The investment project provides for the reconstruction, redevelopment and major renovations of an existing four-storey hotel building – building with identifier 51500.502.313.4, which is commissioned under current legislation. The built-up area and the built-up scope of the building shall be reduced, including the reduction of the building height in compliance with mandatory building lines and with silhouetting in accordance with the issued Design Visa and the prepared Volumetric Spatial Development Study. By dismantling horizontal and vertical architectural and structural elements, the space around and above the mill built into the site, which does not have the status of immovable cultural property, shall be freed as much as possible. The exterior and interior exposure of the mill as a single stone structure in good physical condition and with a specific typological affiliation is ensured. Part of the fourth floor in the north-east corner of the building is also being removed, thus achieving spatial integration within the extent of the heritage area. An internal reconstruction has been designed to optimally comply with the current regulatory requirements and the specified comfort categories for the type of public service building for accommodation and catering. The project includes a major refurbishment of the building elevations and a new pitched roof with terraced indents. The intervention defined by the investment project - reconstruction, redevelopment and major renovations - does not include any activities related to impact on the ground surface, the ground base and the subsoil that are outside the contour of the existing foundations. During the implementation and construction of the investment project no excavation works for architectural and structural elements will be carried out outside the contour of the existing foundations, and therefore no possible archaeological sites are expected to be affected or disturbed. Given the installation characteristics of the building and the contracts concluded with the operating companies, no new transport and/or installation technical infrastructure is foreseen, including building diversions for connection to common networks and facilities. There is no change to the basic vertical layout, as well as to the existing parking and landscaping, in RLP VIII 639 for hotel, restaurant and disco, quadrant 54.

The investment project of 2022 on the Architectural part is supplemented by an explanatory note of July 2022 on the conservation of immovable cultural property within the scope of the site. The compliance of the project documentation of 2022 with the prescriptions for

the conservation of the group immovable cultural property “Ancient City of Nessebar” within the boundaries of the buffer zone “A” is presented through textual materials and graphical schemes in tabular-comparative form. The adequate formation of the architectural composition of the facades and roofs of the hotel is considered as a condition for sustainable development in accordance with the current spatial plan and when built around the theoretically defined three pillars of sustainable development.

The issued Design Visa is in accordance with the norm of Art. 140 of the SPA and Art. 79, para. 5 of the CHA on immovable cultural property. It is in compliance with the current detailed spatial plan and the development indicators for the development category are respected.

The submitted Comprehensive Spatial Development Study fulfils the requirement of Art. 83, para. 4 of the CHA in conjunction with Art. 138 of the SPA where no detailed spatial plan has been agreed for an area or part of an area of cultural heritage. In the specific location of the site, the statutory permissibility under the CHA and appropriateness has been demonstrated. The volumetric and spatial solution is in a horizontal layout on the site, consistent with the traditional spatial characteristics of the area.

The investment project has been developed in accordance with the Design Visa, the submitted volumetric and spatial study and detailed architectural capturing, structural capturing and structural statement of the current state of the existing structure. The architectural image “conforms to the traditional development spatial characteristics” for the buffer zone of the heritage property and organically “makes a transition to the realized massive construction” of the mainland. The project documentation complies with the norms for the spatial planning protection of the immovable cultural heritage pursuant to Art. 79, para. 5 et seq. of the CHA.

The planned intervention in the buffer zone of the group immovable cultural property “Archaeological reserve and historical settlement - architectural and urban immovable cultural property “The Ancient City of Nessebar” (Order No. PД9P-14/05.06.2015. of the Minister of Culture) of world and national importance and within the territorial scope of an archaeological immovable cultural property with the category “national importance” according to the submitted design visa, volumetric and spatial planning study and investment project, does not contradict the cultural value and significance of the above immovable cultural property. The investment proposal for reconstruction, redevelopment and major renovations with reduction of the area and scope of the existing main building for public services - hotel, is in accordance with the defined and announced prescriptions for conservation of the buffer zone “A” of the group immovable cultural property “Ancient City of Nessebar” and with the proposed prescriptions for conservation of the archaeological immovable cultural property “Necropolis of Mesambria-Mesembria”.

With reference to Decision No. 45 COM 7B.179 of the Session of the World Heritage Committee in the part concerning the implementation of the recommendations under item 9 of the “List of Recommendations” of the 2023 Joint Mission Report on Reactive Monitoring in relation to and with the recommendations of the 2018 Joint Mission Report on Reactive Monitoring: 9. *Study the possibility of re-acquiring the plot with the unfinished hotel construction and its subsequent removal to create an uninterrupted view from the necropolis to the peninsula.*

The Ministry of Culture, by letter No. CT-84-417/21.12.2023, has started a process of studying the possibilities for acquisition of real estate, representing a hotel - building with identifier 51500.502.313.4 and a land plot with identifier 51500.502.313 according to the CMCR of the city of Nessebar, RLP VIII-639 for hotel, restaurant and disco, quadrant 54, on the plan of the city of Nessebar, Nessebar Municipality, Burgas Region; 1 Lyuben Karavelov Str. In compliance with the Bulgarian legislation in force regarding the possibilities for the property to be acquired by the State, the Ministry of Culture has sent a letter No. CT-84-417/21.12.2023 to B.H.R. LTD, the owner of the property, with a request regarding its views on the purchase by the State of the real estate owned by it on mutually satisfactory terms. The Ministry has



expressed its readiness to hold a preliminary meeting with the owner to discuss the intentions and find a suitable solution that would benefit the cultural heritage of the Republic of Bulgaria and its citizens and respect the right to private property.

In a letter No. CT-84-417/08.01.2024 to the Ministry of Culture, Ms. Vanya Filipova, Manager of B.H..R. LTD., declared clearly and definitely that she does not consider any possibilities for the sale to the state of her own real estate - a building (with the purpose of a hotel) with the identifier 51500.502.313.4, Land Plot with the identifier 51500.502.313 according to the CMCR of the city of Nessebar, RLP VIII-639 for hotel, restaurant and disco, quadrant 54 on the plan of the city of Nessebar, Nessebar Municipality, Burgas region, 1 Lyuben Karavelov Str.

Based on the above,

**THE MINISTRY OF CULTURE AGREES:**

**Design Visa for “Reconstruction, redevelopment and major renovations - scope reduction, re-facade and pitched roof with terraced indents, of a hotel - building with identifier 51500.502.313.4 along mandatory building lines and with a reduction in building height”, Volumetric and spatial study and Investment project for the site: “Reconstruction, scope reduction, major renovations of facade and pitched roof with terraced indents of a legally constructed hotel - building with identifier 51500.502.313.4, Land Plot with identifier 51500.502.313 according to the CMCR of the city of Nessebar, RLP VIII-639 for a hotel, restaurant and disco, quadrant 54 according to the plan of the city of Nessebar, Nessebar municipality, Burgas region; 1Lyuben Karavelov Str.; parts: Architectural and Structural; Phase: Technical Design (TD), with the following requirements:**

a) In view of the works included in the investment proposal for “*reconstruction*, scope reduction, major renovation of the facade and pitched roof ... of a legally constructed hotel”, in the process of subsequent execution of construction works that are related to the impact on the ground surface and the ground base, including excavation of parking and landscaping (if applicable), to be carried out under the supervision of an archaeologist in accordance with Art. 161, para. 2 of the CHA and under the conditions of Art. 148, para. 5, Art. 160 et seq. of the same Law.

b) In case of discovery of archaeological sites that have signs of immovable archaeological cultural property, Articles 148 and 160 of the CHA in conjunction with Art. 72 of the same law shall be applied, as the construction activities shall be stopped immediately and the Museum “Ancient Nessebar” and RHM-Burgas shall be notified. The salvage archaeological field investigations required by law shall then be accepted by a committee in accordance with Art. 158a of the CHA.

в) In the case of archaeological structures on site, the investment project shall be revised in accordance with the decisions of the approved protocol of the Commission under Art. 158a of the CHA, and the revised project documentation shall be coordinated with NIICH / Ministry of Culture on the basis of Art. 83 and in accordance with Art. 84 of the CHA.

The final assessment and decision, taking into account the compliance of the documentation with the technical requirements, rules and regulations, according to the procedure regulated in the SPA, is within the competence of the specialized municipal administration.

**DEPUTY MINISTER OF CULTURE:**

**ARCH. CHAVDAR GEORGIEV**

| No | No. and date of the permission for use | No. and date of a planning permission | Construction  | Location        | Land Identifier  | Quarter  | Zoned Land     | Contracting Authority (person - three names, entity, represented by....) PIN or UIC |  |
|----|--|---------------------------------------|---|-----------------|--|----------|----------------|---|--|
|    |  | 5/14.03.2011                          | Conservation, restoration and socialization of the Church of 'St. John the Baptist'   | Town of Nesebar | 51500.501.331  | 6        | III-278        | Nesebar Municipality  |  |
|    |  | 6/14.03.2011                          | Conservation, restoration and socialization of the Church of 'St. Paraskeva'  | Town of Nesebar | 51500.501.116<br>и<br>51500.501.104                                  | 12<br>10 | VII-204<br>IV- | Nesebar Municipality  |  |
|    |  | 7/14.03.2011                          | Cultural and tourist route 'Spiritual Way', fragment of the Church of 'St. John the Baptiste' to the Church of 'St. Paraskeva' and the Church of 'St. Archangel Michael and Gabriel', town of Nesebar | Town of Nesebar | 51500.501.303;<br>51500.501.304;<br>51500.501.100;<br>51500.501.106; |          |                | Nesebar Municipality  |  |
|    |  | 9/05.04.2011                          | Internal reconstruction - change of the functional purpose of a commercial site into an 'espresso cafe'   | Town of Nesebar | 51500.501.404  | 47       | III-164        | Georgi Dimitrov Shishmanidov  |  |
|    |  | 17/20.04.2011                         | HH Cables   | Town of Nesebar | 51500.501.134  | 16       | IX-269         | EVN<br>Elektorazpredelenie  |  |
|    |  | 17/20.04.2011                         | HH Cables   | Town of Nesebar | 51500.501.134  | 16       | IX-269         | EVN<br>Elektorazpredelenie  |  |
|    |  | 20/29.04.2011                         | External electrification with HH cables   | Town of Nesebar | 51500.501.41;<br>51500.501.40;                                       |          |                | EVN<br>Elektorazpredelenie  |  |
|    |  | 21/29.04.2011                         | External electrification with HH cables   | Town of Nesebar | 51500.501.409  |          |                | EVN<br>Elektorazpredelenie  |  |
|    |  | 22/04.05.2011                         | Rebuild of the rooftop of a residential building  | Town of Nesebar | 51500.501.434  | 50       | V-311          | Atanas Hristov Kufetov; Radka Hristova Kufetova                                     |  |

[illegible]

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|----|--|---------------------------------------|---|-----------------|-----------------|---------|--------------|---|
|    |  | 17/10.04.2012                         | Residential building (adaptation)   | Town of Nesebar | 51500.501.250   | 31      | II-126       | Aleksandar Kirilov Stoyanov   |
|    |  | 25/19/04/2012                         | Internal reconstruction of a part of a ground floor of a residential building in order to create 2 shops for industrial goods | Town of Nesebar | 51500.501.365   | 58      | IV-326       | Veselin Dimitrov Marinov  |
|    |  | 26/20.04.2012                         | Internal reconstruction of an existing garage into a shop for industrial goods  | Town of Nesebar | 51500.501.314   | 55      | V-290        | Ivan Atanasov Naumov  |
|    |  | 31/04.05.2012                         | Construction of a covered commercial area - a shop for light industry goods and refacading an existing shop                   | Town of Nesebar | 51500.501.138   | 14      | III-208; IV- | Georgi Petrov Stamkov   |
|    |  | 40/04.06.2012                         | Residential building with a shop - refacading, removal of illegal volume and reconstruction                                   | Town of Nesebar | 51500.501.313   | 55      | IV-289       | Stefko Spasov Strezov; Mariya Nedelcheva Strezova                                   |







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|----|--|---------------------------------------|---|-----------------|-----------------|---------|------------|---|------------|
|    |  | 24/27.01.2014                         | Conservation, restoration and socialization of the Church of 'St. Archangel Michael and Gabriel'  | Town of Nesebar | 51500.501.104   | 10      | IV-235     | Nesebar Municipality  |            |
|    |  | 165/03.04.2014                        | Forming yard space in order to eliminate illegal construction and exposure of a residential building - immovable cultural property and forming a canopy - commercial area in the yard space | Town of Nesebar | 51500.501.61    | 27      | VII-79     | Dobrina Yankova Nikolova  |            |
|    |  | 228/14.05.2014                        | Reconstruction and change of the purpose of a residential floor into a shop   | Town of Nesebar | 51500.501.112   | 12      | V-244      | Georgi Vladov Aleksiev  |            |
|    |  | 321/11.08.2014                        | Reconstruction and change of the purpose of a part of a residential floor into a souvenir and packaged goods shop   | Town of Nesebar | 51500.501.257   | 35      | III-139    | Stavrina Kirilova Mihaylova   |            |
|    |  | 381/08.09.2014                        | Reconstruction and change of the purpose of a part of a residential floor into a souvenir and packaged goods shop   | Town of Nesebar | 51500.501.113   | 11      | VI-208     | Dimitar Stoyanov Genchev  |            |
|    |  | 422/01.10.2014                        | Reconstruction of existing electrical equipment .....   | Town of Nesebar | 51500.501.454   | 106     | II-454     | Marina Nesebar AD   |            |

|  |  |                    |   |                    |  |     |          |   |  |
|--|--|--------------------|---|--------------------|--|-----|----------|---|--|
|  |  | 423/01.10.20<br>14 | Reconstruction of existing<br>electrical equipment .....  | Town of<br>Nesebar | 51500.501.454;<br>51500.501.452;<br>51500.501.490; |     |          | Marina Nesebar AD                         |  |
|  |  | 424/01.10.20<br>14 | External power supply of<br>'Marina harbour with a<br>commercial administrative<br>complex Marina Nesebar<br>1'.....HH Cables...  | Town of<br>Nesebar | 51500.501.454;<br>51500.501.468;<br>51500.501.490; |     |          | EVN Bulgaria<br>Elektrozpredelenie<br>EAD |  |
|  |  | 425/01.10.20<br>14 | External power supply of<br>'Commercial service complex<br>Marina Nesebar-2'.....HH<br>Cables...  | Town of<br>Nesebar | 51500.501.454                                      |     |          | EVN Bulgaria<br>Elektrozpredelenie<br>EAD |  |
|  |  | 426/01.10.20<br>14 | External power supply of<br>'Commercial service complex<br>Marina Nesebar-2'.....HH<br>Cables...  | Town of<br>Nesebar | 51500.501.454;<br>51500.501.490;                   |     |          | EVN Bulgaria<br>Elektrozpredelenie<br>EAD |  |
|  |  | 427/01.10.20<br>14 | External power supply of<br>'Commercial service complex<br>Marina Nesebar-2'.....HH<br>Cables...  | Town of<br>Nesebar | 51500.501.454                                      | 106 | II-454   | EVN Bulgaria<br>Elektrozpredelenie<br>EAD |  |
|  |  | 447/14.10.20<br>14 | Internal restructure in order to<br>change the purpose of a part of<br>the first floor of a residential<br>building into a shop - merger of<br>an existing shop and storage | Town of<br>Nesebar | 51500.501.403                                      | 47  | II-163   | Stoyan Lyubomirov<br>Isaev                |  |
|  |  | 24/27.01.201<br>4  | Conservation, restoration and<br>socialization of the Church of<br>'St. John the Baptist'   | Town of<br>Nesebar | 51500.501.440                                      | 50  | VIII-313 | Nesebar Municipality                      |  |
|  |  |                    |   |                    |  |     |          |   |  |
|  |  | Legend:            |   |                    |  |     |          |   |  |
|  |  |                    | New Construction  |                    |  |     |          |   |  |

[illegible]

| No | No. and date of the permission for use | No. and date of a planning permission | Construction  | Location        | Land Identifier | Quarter | Zoned Land | Contracting Authority (person - three names, entity, represented by....) PIN or UIC | Tax Return |
|----|--|---------------------------------------|---|-----------------|-----------------|---------|------------|---|------------|
|    |  | 18/22.01.2015                         | Reconstruction and restructure if 'Menambria' hotel-restaurant  | Town of Nesebar | 51500.501.393   | 53      | I-332      | Mesembria AD  |            |
|    |  | 71/16.02.2015                         | Change of the purpose of a part of a residential floor into an industrial goods shop  | Town of Nesebar | 51500.501.135   | 14      | I-202      | Atanas Yanakiev Kostov  |            |
|    |  | 145/27.03.2015                        | Replacement of an existing MCTP Mitropolit.....   | Town of Nesebar | 51500.501.497   | 34      | VI-417,418 | Nesebar Municipality  |            |
|    |  | 147/30.03.2015                        | Reconstruction of a one-storey building - summer kitchen, reconstruction in order to change its purpose and turn it into a shop           | Town of Nesebar | 51500.501.198   | 23      | V-39       | Zora Vasileva Dramcheva   |            |
|    |  | 201/22.04.2015                        | Change of the purpose of a part of a residential floor into a souvenir and packaged goods shop  | Town of Nesebar | 51500.501.434.1 | 50      | V-311      | Radka Georgieva Kufetova.....   |            |
|    |  | 253/08.06.2015                        | Strengthening of a ramp of a building with ID No. 51500.501.497 under Cadastre ( 42 Mesembria Str.)                                       | Town of Nesebar | 51500.501.497   |         |            | Nesebar Municipality  |            |
|    |  | 382/15.10.2015                        | Sports sites in land 51500.501.4 under Cadastre, town of Nesebar, subproject 'Mini football pitch with two basketball courts - 1st stage' | Town of Nesebar | 51500.501.4     |         |            | Nesebar Municipality  |            |





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|----|--|---------------------------------------|--|-----------------|---|---------|------------|---|------------|
|    |  | 47/10.02.2016                         | Change of the purpose of a part of a residential floor into a souvenir, light industrial goods and packaged goods shop             | Town of Nesebar | 51500.501.123   | 11      | VI-208     | Elka Aleksandrova Taneva  |            |
|    |  | 48/11.02.2016                         | Internal reconstruction of an existing shop, garage and storage space in order to merge them into one - 'an industrial goods shop' | Town of Nesebar | 51500.501.249   | 31      | I-125      | Nikolay Kostoya Stoyanov  |            |
|    |  | 89/11.03.2016                         | Reconstruction of a street network   | Town of Nesebar | 51500.501.303;<br>501.360;<br>501.395;<br>501.442;<br>501.443 |         |            | Nesebar Municipality  |            |
|    |  | 206/22.07.2016                        | Change of the purpose of an existing space into a souvenir, light industrial goods and packaged goods shop                         | Town of Nesebar | 51500.501.149   | 42      | XV-98      | Penka Kirova Nikolova.....and others  |            |
|    |  | 283/11.11.2016                        | Change of the purpose of a 'confectionary' into a 'bistro'   | Town of Nesebar | 51500.501.359   | 51      |            | Gyuldzhan Kamber Adem   |            |
|    |  | 307/30.11.2016                        | Change of the purpose of an existing hotel into a residential building   | Town of Nesebar | 51500.501.101   | 10      | V-237      | G V TRADING EOOD  |            |
|    |  |                                       |  |                 |   |         |            |   |            |
|    |  | Legend:                               |  |                 |   |         |            |   |            |
|    |  |                                       | New Construction   |                 |   |         |            |   |            |

[illegible]

| No. | No. and date of the permission for use | No. and date of a planning permission | Construction  | Location        | Land Identifier | Quarter | Zoned Land | Contracting Authority (person - three names, entity, represented by....) PIN or UIC | Tax Return |
|-----|--|---------------------------------------|---|-----------------|-----------------|---------|------------|---|------------|
|     |  | 28/10.08.2017                         | Refacading of a two-storey residential building   | Town of Nesebar | 51500.501.405   | 47      | IV-166     | Krastyu Yankov Kopilov; Mariya Yankova Kopilova                                     |            |
|     |  | 211/18.08.2017                        | Restructure of a residential building (party wall) into a residential building for seasonal use with shops for industrial goods and implementing the 2nd stage: 2,3 residential floors and an attic | Town of Nesebar | 51500.501.320   | 104     | IX-694     | Borislav Krastev Baychev  |            |
|     |  | 216/31.08.2017                        | Sport sites in land 51500.501.4 under Cadastre, town of Nesebar, subproject 'Two playgrounds' 2nd   | Town of Nesebar | 51500.501.4     |         |            | Nesebar Municipality  |            |
|     |  | 239/09.10.2017                        | Engineer work for the construction of street lights at the town of Necebar - ancient city, 'Kraybrezhna' Str. in the 'Northern Harbour' part  | Town of Nesebar | 51500.501.485   |         |            | Nesebar Municipality  |            |
|     |  | 250/27.10.2017                        | Reconstruction in order to change the purpose of 2 industrial goods shops into a 'fast food restaurant'   | Town of Nesebar | 51500.501.148   | 42      | XII        | Zoya Ivanova Markova  |            |
|     |  | 305/15.12.2017                        | Reconstruction in order to change the purpose of a part of an existing residential building into a shop   | Town of Nesebar | 51500.501.421   | 38      | I-161      | Elenka Nikolova Petrova   |            |
|     |  | 324/22.12.2017                        | Renovation of the roof and refacade of a two-storey residential building  | Town of Nesebar | 51500.501.386   | 57      | I-347      | Stoyanka Zapryanova Kozhuharova.... And others                                      |            |
|     |  | Legend:                               |   |                 |                 |         |            |   |            |
|     |  |                                       | New Construction  |                 |                 |         |            |   |            |
|     |  |                                       | Reconstruction, Refacading, Removal of Illegal Volumes with the aim of Restoring the Authentic Look, etc.'  |                 |                 |         |            |   |            |
|     |  |                                       | Development and Infrastructure  |                 |                 |         |            |   |            |
|     |  |                                       | Conservation and Restoration of Single Immoveable Cultural Property   |                 |                 |         |            |   |            |

| No. | No. and date of the permission for use | No. and date of a planning permission | Construction   | Location        | Land Identifier  | Quarter | Zoned Land | Contracting Authority (person - three names, entity, represented by....) PIN or UIC | Tax Return |
|-----|--|---------------------------------------|--|-----------------|--|---------|------------|---|------------|
|     |  | 32/24.01.2018                         | Reconstruction of a residential plot into a commercial one   | Town of Nesebar | 51500.501.367  | 58      | XIV-687    | Kalinka Stefanova Geringer; Velimira Aleksandrova Karadzhova                        |            |
|     |  | 289/28.09.2018                        | Sport sites in land 51500.501.4 under Cadastre of the town of Nesebar; Subproject 'Starcasе' - third stage | Town of Nesebar | 51500.501.4  |         |            | Nesebar Municipality  |            |
|     |  | 346/17.12.2018                        | Reconstruction of a street network: 'Aheloy' .....   | Town of Nesebar | 51500.501.311;<br>51500.501.402;<br>51500.501.409;<br>51500.501.294;<br>51500.501303;<br>51500.501.283 |         |            | Nesebar Municipality  |            |
|     |  |                                       |  |                 |  |         |            |   |            |
|     |  |                                       |  |                 |  |         |            |   |            |
|     |  | Legend:                               |  |                 |  |         |            |   |            |
|     |  |                                       | New Construction   |                 |  |         |            |   |            |
|     |  |                                       | Reconstruction, Refacading, Removal of Illegal Volumes with the aim of Restoring the Authentic Look, etc.' |                 |  |         |            |   |            |
|     |  |                                       | Development and Infrastructure   |                 |  |         |            |   |            |
|     |  |                                       | Conservation and Restoration of Single Immovalble Cultural Property  |                 |  |         |            |   |            |



| No. and date of the permission for use | No. and date of a planning permission                              | Construction  | Location        | Land Identifier   | Quarter | Zoned Land           | Contracting Authority (person - three names, entity, represented by....) PIN or UIC | Tax Return |
|--|--|---|-----------------|---|---------|----------------------|---|------------|
|  | 12/16.01.2019  | Change of the purpose of a part of a residential floor - first floor rooms turned into light industrial goods, souvenir and packaged goods shops  | Town of Nesebar | 51500.501.429   | 49      | III-304              | Nikola Matev Boyadzhiev   |            |
|  | 14/18.01.2019  | Overhaul of 'Lyuben Karavelov' Primary School - buildings with ID No. 51500.501.377.1 and 51500.501.377.2   | Town of Nesebar | 51500.501.377   | 57A     | I-municipal          | Nesebar Municipality  |            |
|  | Order No. 89-2016-001/12.02.2019r. To Regional Court 89/11.03.2016 | Reconstruction of a street network: 'Mesembria' Str., 'Mena' Str. .... Etc.   | Town of Nesebar | 51500.501.303;<br>51500.501.360;<br>51500.501.395;<br>51500.501.442;<br>51500.501.443 |         |                      | Nesebar Municipality  |            |
|  | 36/28.02.2019  | Reconstruction of the roof ( removal of illegal volume ) and delineation of usable under-roof space of a residential building   | Town of Nesebar | 51500.501.157   | 28      | IV-83                | Plamen Panayotov Kehayov  |            |
|  | 130/30.04.2019   | Sport sites in zoned land IV-4, 477, municipal quarter 18A, land 51500.501.516 (former land 51500.501.4) under the Cadastre of the town of Nesebar <b>I stage</b> - Outdoor Fitness   | Town of Nesebar | 51500.501.516 (former land 51500.501.4)   | 18A     | IV-4, 477, municipal | Nesebar Municipality  |            |
|  | 131/30.04.2019   | Sport sites in zoned land IV-4, 477, municipal quarter 18A, land 51500.501.516 (former land 51500.501.4) under the Cadastre of the town of Nesebar <b>II stage</b> - Park space and water and sewage diversion for the property                       | Town of Nesebar | 51500.501.516 (former land 51500.501.4)   | 18A     | IV-4, 477, municipal | Nesebar Municipality  |            |
|  | 132/30.04.2019   | Sport sites in zoned land IV-4, 477, municipal quarter 18A, land 51500.501.516 (former land 51500.501.4) under the Cadastre of the town of Nesebar <b>III stage</b> - Site for the placement of movable objects ( cafe, pavilions and public toilet ) | Town of Nesebar | 51500.501.516 (former land 51500.501.4)   | 18A     | IV-4, 477, municipal | Nesebar Municipality  |            |
|  | Order No. 289-2018-001/10.06.2019                                  | Sport sites in land 51500.501.4 under the Cadastre of the town of Nesebar - subproject Staircase - third stage - change during construction   | Town of Nesebar | Land 51500.501.4 under the Cadastre   | 18A     | IV-4, 477, municipal | Nesebar Municipality  |            |
|  | 210/01.08.2019   | Conservation, restoration, exhibition and adaptation of cultural property 'Windmill' ( in the middle of the isthmus )   | Town of Nesebar | Land 51500.501.484 under the Cadastre   | 18A     | IV-4, 477, municipal | Nesebar Municipality  |            |

| No. and date of the permission for use | No. and date of a planning permission | Construction   | Location        | Land Identifier                       | Quarter | Zoned Land       | Contracting Authority (person - three names, entity, represented by....) PIN or UIC | Tax Return |
|--|---------------------------------------|--|-----------------|---------------------------------------|---------|------------------|---|------------|
|  | 229/02.09.2019                        | Reconstruction of the fence in zoned land V-237 quarter 10 under the Cadastre of the town of Nesebar (land 51500.501.101 (towards 'Aheloy' Str. (land 51500.501.79) and towards 'Venera' (land 51500.501.106)  | Town of Nesebar | Land 51500.501.101 under the Cadastre | 10      | Zoned land V-237 | Borislav Pavlov Moravenov   |            |
|  | 234/10.09.2019                        | Reconstruction of a separate site with ID No. 51500.501.244.1.3 under the Cadastre of the town of Nesebar, in two catering and entertainment establishments: with ID. No. 51500.501.244.1.4 and ID No. 51500.501.244.1.5, situated on the first floor of a residential building PART I - catering and entertainment establishment with ID No. 51500.501.244.1.4  | Town of Nesebar | Land 51500.501.244                    | 31a     | II-129           | Kosta Georgiev Novakov  |            |
|  | 237/12.09.2019                        | Reconstruction of a separate site with ID No. 51500.501.244.1.3 under the Cadastre of the town of Nesebar, in two catering and entertainment establishments: with ID. No. 51500.501.244.1.4 and ID No. 51500.501.244.1.5, situated on the first floor of a residential building PART II - catering and entertainment establishment with ID No. 51500.501.244.1.5 | Town of Nesebar | Land 51500.501.244                    | 31a     | II-129           | Margarita Georgieva Novakova  |            |
|  |                                       |  |                 |                                       |         |                  |   |            |
|  | Legend:                               |  |                 |                                       |         |                  |   |            |
|  |                                       | New Construction   |                 |                                       |         |                  |   |            |
|  |                                       | Reconstruction, Refacading, Removal of Illegal Volumes with the aim of Restoring the Authentic Look, etc.'   |                 |                                       |         |                  |   |            |
|  |                                       | Development and Infrastructure   |                 |                                       |         |                  |   |            |
|  |                                       | Conservation and Restoration of Single Immoveable Cultural Property  |                 |                                       |         |                  |   |            |

| No. | No. and date of the permission for use | No. and date of a planning permission | Construction   | Location        | Land Identifier    | Quarter | Zoned Land  | Contracting Authority (person - three names, entity, represented by....) PIN or UIC | Tax Return |
|-----|--|---------------------------------------|--|-----------------|--------------------|---------|-------------|---|------------|
|     |  | No. 65/26.03.2020r.                   | Temporary emergency strengthening of national cultural property 'Windmill' (at Eleusa, at the northern shore)  | Town of Nesebar | Land 51500.501.515 | 18A     | I-4,7       | Nesebar Municipality  |            |
|     |  | 66/26.03.2020                         | Conservation, restoration, exhibition and adaptation under authentic data of national cultural property 'Windmill' (at Eleusa, at the northern shore)  | Town of Nesebar | Land 51500.501.515 | 18A     | I-4,7       | Nesebar Municipality  |            |
|     |  | 158/15.09.2020                        | Development of park space and site plumbing and electrical networks to a bazaar of movable sites in zoned land I-municipal quarter 106 under the Cadastre of the town of Nesebar, with ID No. 51500.501.451 under the Cadastre | Town of Nesebar | Land 51500.501.451 | 106     | I-municipal | Nesebar Municipality  |            |
|     |  | 177/07.10.2020                        | Reconstruction and restoration of the southern part of the national cultural property 'The House of Ivan Tulev' and restoration of the facade of the whole building  | Town of Nesebar | Land 51500.501.163 | 28      | III-89      | Pavel Ivanov Masov  |            |
|     |  |                                       |  |                 |                    |         |             |   |            |
|     |  |                                       |  |                 |                    |         |             |   |            |
|     |  |                                       |  |                 |                    |         |             |   |            |
|     |  |                                       |  |                 |                    |         |             |   |            |
|     |  | Legend:                               |  |                 |                    |         |             |   |            |
|     |  |                                       | New Construction   |                 |                    |         |             |   |            |
|     |  |                                       | Reconstruction, Refacading, Removal of Illegal Volumes with the aim of Restoring the Authentic Look, etc.'   |                 |                    |         |             |   |            |
|     |  |                                       | Development and Infrastructure   |                 |                    |         |             |   |            |
|     |  |                                       | Conservation and Restoration of Single Immoveable Cultural Property  |                 |                    |         |             |   |            |

| No | No and date of the permit to use | No and date of construction permit | Construction  | Location         | LP Identifier | qtr.   | UPI      | Assignor (individual-full name, legal person represented by ... UCN or | Tax declaration |
|----|----------------------------------|------------------------------------|---|------------------|---------------|--------|----------|--|-----------------|
|    |                                  | 87/ 23. 04.2021                    | "Reconstruction of the head of an existing breakwater to a floating pier - breakwater on the territory of the fishing port "Severna buna - Nessebar"                    | Town of Nessebar | 51500.501.507 |        |          | Municipality of Nessebar   |                 |
|    |                                  | 88/ 23. 04. 2021                   | "Reconstruction of existing on-site electricity and water supply networks for powering port facilities on the territory of the fishing port "Severna boua - Nessebar" " | Town of Nessebar | 51500.501.507 |        |          | Municipality of Nessebar   |                 |
|    |                                  | 98/ 12. 05. 2021                   | "Reconstruction of an existing residential building with identifier 51500.501.480.1 as per the CM of Nessebar"  | town of Nessebar | 51500.501.480 | VI-328 | 58       | Zdravka Ventsislavova Tihova - Nikolova and Evgenia Ventsislavova      |                 |
|    |                                  | 123/ 25. 06. 2021                  | "Conservation, restoration, exposure and socialization of the Church "Christos Pantokrator" ICA with identifier 51500.501.321.1 as per CM"                              | town of Nessebar | 51500.501.321 | 56     | I        | Municipality of Nessebar   |                 |
|    |                                  | 151/ 29. 07. 2021                  | "Restoration and adaptation of a building with identifier 51500.501.92.3 as per CMCR of Nessebar - "House of Heirs of Kosta Nenov" ICA                                  | town of Nessebar | 51500.501.92  | 9      | VIII-323 | Alexandra Velimirova Mircheva  |                 |
|    |                                  | legend:                            |   |                  |               |        |          |  |                 |
|    |                                  |                                    | New building  |                  |               |        |          |  |                 |
|    |                                  |                                    | "Remodeling, re-facade, removal of illegal volume in order to recover the   |                  |               |        |          |  |                 |
|    |                                  |                                    | Landscaping and infrastructure  |                  |               |        |          |  |                 |
|    |                                  |                                    | Conservation and restoration of single immovable cultural   |                  |               |        |          |  |                 |

| № | No and date of the permit to use | No and date of construction permit | Construction  | Location         | LP Identifier   | qtr.     | UPI     | Assignor (individual- full name, legal person represented by ...) UCN or UIC | Tax declaration |
|---|----------------------------------|------------------------------------|---|------------------|---|----------|---------|--|-----------------|
|   |                                  | 64/ 28. 03. 2022                   | "External power supply "Rehabilitation and Modernization of the Severna buna fishing port - Nessebar" in LP 51500.501.507<br>In the CM of Nessebar: Low voltage cable, type NAY2Y- J 4x240 SMMm <sup>2</sup> of LVB of PS "Kraybrezhen" situated in LP 51500.502.79 under the CM of Nessebar next to a new electric dashboard, mounted in LP 51500.502.507 under the CM of Nessebar"  | town of Nessebar | 51500.501.79, 51500.501.343 and 51500.501.507   |          |         | "Electrorazpredelenie Yug" EAD   |                 |
|   |                                  | 81/ 15. 04. 2022                   | "Reconstruction of the roof, major repair of the facade and internal reconstruction of the "House of Orthodoxy Kaloforov" ICA with identifier 51500.501.195.1 under the CM and a terrace thereto with identifier 51500.501.195.2, as well as wc and bath with identifier 51500.501.195.3 under CM"  | town of Nessebar | 51500.501.195   | 21       | II-23   | Rumen Slavchev Stefanov  |                 |
|   |                                  | 93/ 11. 05. 2022                   | "External power supply of a residential building in LP 51500.501.5/UPI II-695 qtr. 18a/ under Nessebar's CM sub-site: CCTP"Kraybrezhen 2" 20/0.4kV, 1x800kVA /Equipped for 1x400kVA/ in LP 51500.501.516 in CM of Nessebar"   | town of Nessebar | 51500.501.516   | IV-4,477 | 18A     | "Electrorazpredelenie Yug" EAD   |                 |
|   |                                  | 136/ 06. 07. 2022                  | "Street network reconstruction: Mesambria str. /partially/ between p.92 -p. 93 - p.98 - p.60-p.59 - p.58-p.50, on the Regulation plan of Nessebar - the old town, Municipality of Nessebar"   | town of Nessebar | 51500.501.409   |          |         | Municipality of Nessebar   |                 |
|   |                                  | 189/ 05. 10. 2022                  | "External power supply of a residential building in LP 51500.501.5/UPI II-695 qtr.18a/ under Nessebar's CM: Cables 20kV (2 pcs), type NA2XS(F)2Y3x(1x185mm <sup>2</sup> ) from connecting sockets of a broken existing cable 20KV "TP" Bogoroditsa" - TP "Granichar" next to CCTP "Kraybrezhen 2" in LP 51500.501.516 in CM of Nessebar; pipe - duct grid/2 pcs. of concrete shafts with dimensions 1.50/1.50/1.50m and 6 pcs. of PVC F160mm tubes/ in LP 51500.501.516 under CM of Nessebar, Municipality of Nessebar" | town of Nessebar | 51500.501.168, 51500.501.41, 51500.501.79 and 51500.501.516 (UPI IV-4,477) In qtr.18A | 18A      | IV-4477 | "Electrorazpredelenie Yug" EAD   |                 |
|   |                                  | 190/ 05. 10. 2022                  | "External power supply of a residential building in LP 51500.501.5/UPI II-695 qtr.18a/ under Nessebar's CM: AY2Y-J 4x95 SMMm <sup>2</sup> low voltage cable from the LVB of the "Kraybrezhen 2" CCTP" found in LP 51500.501.516 as per CM of Nessebar next to a new electric board, mounted on the borderline of LP 51500.501.5 as per CM of Nessebar"  | town of Nessebar | 51500.501.79 and 51500.501.516 (UPI IV-4,477) In qtr.18A                              | 18A      | IV-4477 | "Electrorazpredelenie Yug" EAD   |                 |
|   |                                  | 194/ 06. 10. 2022                  | "Reconstruction of the roof and under-roof space and repair of the facades of residential building with identifier 51500.501.480.1"   | town of Nessebar | 51500.501.480   | 58       | VI-328  | Zdravka Ventsislavova Tihova and Evgenia Ventsislavova Tihova – Popova       |                 |
|   |                                  | legend:                            |   |                  |   |          |         |  |                 |



| No | No and date of the permit to use | No and date of construction permit | Construction  | Location | LP Identifier | qtr. | UPI | Assignor (individual- full name, legal person represented by ...) UCN or UIC | Tax declaration |
|----|----------------------------------|------------------------------------|---|----------|---------------|------|-----|--|-----------------|
|    |                                  |                                    | New building  |          |               |      |     |  |                 |
|    |                                  |                                    | "Remodeling, re-facade, removal of illegal volume in order to recover the authentic look etc. |          |               |      |     |  |                 |
|    |                                  |                                    | Landscaping and infrastructure  |          |               |      |     |  |                 |
|    |                                  |                                    | Conservation and restoration of single immovable cultural assets                              |          |               |      |     |  |                 |

| № | No and date<br>of the permit<br>to use | No and date<br>of construction<br>permit | Construction  | Location                       | LP Identifier                         | qtr.           | UPI                   | Assignor<br>(individual- full<br>name, legal<br>person | Tax declarat ion |
|---|--|--|---|--------------------------------|---------------------------------------|----------------|-----------------------|--|------------------|
|   |  | 254/<br>16.11.2023                       | Street water pipeline for<br>Regulated land property II-<br>468, neighborhood 105 and<br>Regulated land property II-<br>454, neighborhood 106 | the Ancient City of<br>Nesebar | 51500.501.450<br>and<br>51500.501.490 | 105 and<br>106 | II-468 and II-<br>454 | Municipality of<br>Nessebar                            |                  |

| No | No and date of the permit to use | No and date of construction permit | Construction   | Location | LP Identifier | qtr. | UPI     | Assignor (individual-full name, legal person represented by ... UCN or UIC) | Tax declaration |
|----|----------------------------------|------------------------------------|--|----------|---------------|------|---------|---|-----------------|
|    |                                  | 68/<br>21.02.2024                  | conservation and restoration interventions on the church St. Archangels Michael and Gabriel  | Nesebar  | 51500.501.104 | 10   | IV      | Municipality of Nessebar  |                 |
|    | Vth                              | 123/<br>22.04.2024                 | Commissioning of part of the ground floor of an existing residential building into a shop and a terrace to the first residential floor of the building | Nesebar  | 51500.501.91  | 9    | VII-231 | Elena Hristova Yapadjieva   |                 |