



Culture Sector
Division for Heritage

United Nations
Educational, Scientific and
Cultural Organization

Organisation
des Nations Unies
pour l'éducation,
la science et la culture

Organización
de las Naciones Unidas
para la Educación,
la Ciencia y la Cultura

Организация
Объединенных Наций по
вопросам образования,
науки и культуры

منظمة الأمم المتحدة
للتربية والعلم والثقافة

联合国教育、
科学及文化组织

H. E. Mr Filip Vucak
Ambassador Extraordinary and
Plenipotentiary of the Republic of
Croatia to France
Permanent Delegate of Croatia to
UNESCO
UNESCO House

Ref.: CLT/HER/WHC/EUR/18/10812

10 October 2018

Subject: State of conservation of the World Heritage property "Old City of Dubrovnik" (Croatia)

Dear Ambassador,

I have the pleasure to transmit to you an ICOMOS Technical Review (Annex I) concerning the Design Proposal and the Introduction in addition to the Heritage Impact Assessment, received on 10 May last, concerning the Belvedere Redevelopment Project in the vicinity of the World Heritage property "Old City of Dubrovnik."

ICOMOS concludes that the proposed project would not have a negative impact on the Outstanding Universal Value of the property, if proceeded with carefully, strictly adhering to all mitigation measures and other spatial planning guidelines. However, the Technical Review notes that building permits can only be issued if the Detailed Urban Plan is annulled, a new Detailed Urban Plan is issued and the necessary revisions to the Spatial Development Plan of the City of Dubrovnik and to the General Urban Plan of the City of Dubrovnik are enacted.

Thanking you for your continuous collaboration and support in the implementation of the *World Heritage Convention*, I remain,

Yours sincerely,

Mechtild Rössler
Director
World Heritage Centre

cc: Croatian Commission for UNESCO
National Focal Point for World Heritage
ICOMOS International

Annex I

ICOMOS Technical Review for *Design Proposal and the Introduction in addition to the Heritage Impact Assessment*, concerning the Belvedere Redevelopment Project in the vicinity of the World Heritage property “Old City of Dubrovnik”

ICOMOS Technical Review

Property	Old City of Dubrovnik
State Party	Croatia
Word Heritage ID	95ter
Date of Inscription	1979
Criteria	(i)(iii)(iv)
Project	Proposed construction of the new Hotel Belvedere

On 29 May 2018, ICOMOS received information from the State Party, via the World Heritage Centre, regarding the Belvedere Redevelopment Project, including a Heritage Impact Assessment. The Advisory Body presents its comments below.

Introduction

The currently derelict Hotel Belvedere occupies a very prominent, 4.5 ha site on Cape Sveti Jakov (Cape Saint James), a rocky promontory which lies 1800m south-east of the Old City of Dubrovnik. The hotel overlooks the Old City which was inscribed on the World Heritage List in 1979 on the basis of criteria (i) and (iii), with criterion (iv) being added in 1994 when the World Heritage property was extended and a small buffer zone was established.

In 2015, a UNESCO/ICOMOS Reactive Monitoring mission recommended that the World Heritage property's buffer zone should be increased in order to protect its setting. The State Party submitted a buffer zone extension proposal in 2017. At the 42nd session of the World Heritage Committee (Bahrain, 2018) this revised buffer zone was approved so that the hotel now lies at its extreme eastern end.

The Heritage Impact Assessment (HIA), which is discussed below, provides a very helpful written commentary on the history and development of the hotel site, together with many maps, plans and photographs. The hotel has two distinctive landscape areas with dense pine and cypress woodland to the west of the hotel building and a native shrub area to the east. There is no evidence of early occupation, however the site lies near to, and east of, the buildings of the former Benedictine monastery of Sveti Jakov, founded in 1222, and south of the former caravan routes leading from eastern gate of the city into the Balkans.

The original Belvedere Inn was built in the 1930s on the western slope of the Cape Sveti Jakov, close to the rocky shore line, and facing the city. In 1985, the inn was renovated and became a tavern restaurant of the new, state-run, 469-bed Belvedere Hotel. The design of this high-rise hotel was controversial, but it was built in spite of objections from local and national heritage experts. The HIA's verdict on the hotel is that "The over-sized and obtrusive structure heavily imposed itself on the slope's silhouette and aggressively intruded into the visual image of the area" and that it did not do justice to "an extraordinary location" with "exquisite views".

The bulky building sits squarely in the World Heritage property's setting and dominates views from the eastern side of the Old City and from the north side of the island of Lokrum.

During the Homeland War, the Croatian War of Independence, 1991-1995, the hotel became an immediate and obvious target for the Yugoslav Army. It was bombed and shelled from the land, sea and air. As a result, the hotel became almost immediately uninhabitable and it has lain empty and

derelict ever since. The HIA states that the present condition of the building is “extremely, poor, obsolete and dilapidated” and that the whole site is gradually transforming into “a sort of post-apocalyptic quasi-archaeology”.

Although the hotel is ruinous, the site now has an established hotel use, and the Heritage Impact Assessment emphasises that “Catastrophic scenarios aside, it will most likely never again be possible to restore the project site to an untouched (pre-1985) condition”.

Accordingly, a specific Detailed Urban Plan (DUP) was drawn up for the site in 2013 which allowed for a new hotel with a significant increase in guest capacity. This DUP is discussed in the HIA, which concluded that:

- the proposals would be an overdevelopment which “would be most compromising for the WHP and the buffer area, and would additionally degrade the Belvedere site”; and
- the Plan is now considered “unsustainable and unacceptable by all accounts and aspects”.

Importantly, however, the DUP stipulates reforesting the site as far as possible. The DUP will remain in force until such time as it is formally annulled.

In 2015, the UNESCO/ICOMOS Reactive Monitoring mission viewed the hotel site and considered it in the light of changing attitudes to the setting of heritage sites as reflected in the ICOMOS Xi'an Declaration, 2005.

In anticipation of its recommendation of an extension of the buffer zone, described above, the 2015 Reactive Monitoring mission suggested that if, and when, a detailed project plan for the site was brought forward, a Heritage Impact Assessment, in line with Paragraph 172 of *The Operational Guidelines for the Implementation of the World Heritage Convention* (UNESCO, 2015), should be conducted and submitted to the World Heritage Centre.

A new project plan for redevelopment of the hotel site has indeed now been brought forward. The project plan is described in the next section of this Technical Review. In accordance with the 2015 Reactive Monitoring mission’s recommendation, this HIA itself was commissioned by the City of Dubrovnik’s Department of Urban Planning and Environment Preservation.

The objective of the HIA is to evaluate the overall impact of the proposed development on the World Heritage property, its buffer zone and the overall setting of the property, and to consider mitigation measures.

The Project

The new hotel project is funded by a private company, Vila Larus Ltd, and project managed by Fanzun AG (Zurich). Following a two tier competition, details of which are given in the HIA, the chosen architect is the 3LHD architecture studio (Croatia). This practise focuses on the integration of architecture, art and landscape.

3LHD proposes that the ruined high-rise hotel should be demolished and replaced by a new resort occupying a gross floor area of c.28,000 m² with a capacity of 270 beds.

The component parts of the resort would consist of:

- hotel reception pavilion;
- main hotel building;
- a short funicular connecting these two buildings; and
- 7 (originally 9) hotel-operated villas.

The main buildings will be low-rise (no more than six storeys) with a non-reflecting matt facade cladding and non-reflective glass. The buildings are designed to blend in with the natural surroundings, since they will be visible from the Old City.

In order to take account of the very steep gradient of the site, the building components are to be arranged to reflect the nearby 'urban matrix' to the west i.e. large buildings (main hotel) at the bottom of the site and smaller ones (the villas) at the top.

A preliminary design has been prepared together with supporting technical studies. The buildings are designed to be environmentally-friendly, resource efficient and energy renewable. There may also be a helidrome, but this is not a critical part of the project.

The Heritage Impact Assessment

The methodology of the Heritage Impact Assessment follows closely the ICOMOS *Guidance on Heritage Impact Assessments for Cultural Heritage Properties*, 2011 (hereafter: ICOMOS *Guidance*). However, in view of the fact that the site and its relationship to the World Heritage property changed dramatically in 1985, when the present ruined hotel was built, the author of the HIA has made "certain adjustments of the methodological approach...the present Heritage Impact Assessment is based on existing conditions, documentation and data, and focuses on the World Heritage Property's Outstanding Universal Value whereas the ICOMOS *Guidance* encompasses all heritage values of a site grading them according to their significance". The HIA employs the definitions used in the *Operational Guidelines*.

The Heritage Impact Assessment takes a five step approach:

- understanding the Outstanding Universal Value of the World Heritage property;
- analysing comprehensively the project site and its values;
- analysing the redevelopment project and the resulting changes;
- identifying the impacts both direct and indirect and their scale and severity; and
- proposing mitigation measures.

The results of this work are contained in six detailed chapters:

- Introduction;
- Methodology;
- Site History and Description;
- Belvedere Redevelopment Project;
- Assessment and Evaluation of Overall Impact of the Proposed Changes;
- Conclusions and Mitigation Measures.

The text is fully referenced and well illustrated.

The HIA demonstrates a thorough understanding of the concept of Outstanding Universal Value as applied to this World Heritage property. The Retrospective Statement of Outstanding Universal Value submitted to the World Heritage Centre in 2017 has been used in the assessments of the World Heritage property's attributes.

All available data sources have been searched: historical and cartographic research conducted; desk-based assessments and field surveys have been commissioned: geodetic, vegetation, and ground based and drone based photography.

Based on the World Heritage property's Outstanding Universal Value and its general setting, the HIA identifies a number of its specific attributes:

- Historic urban landscape;
- Fortification landscape;
- Historic route and communications;
- Historic (designated) buildings;
- Visual, physical and symbolic edge of the Old City's eastern suburb (everyday perception);
- Edge of the place-based identity area of the City (associative landscape);
- Strategic position.

These attributes are each examined in detail. The World Heritage property's intangible visual aspects receive particular attention.

For this exercise, extensive use is made of the most recent research on Dubrovnik's heritage resources: *Heritage Driver - Development, Dubrovnik and Boka Kotorska region, joint cross border activities in applying new methodologies in natural and cultural heritage protection and management 2012-2015*. This research provides grading of the different landscape components of the Dubrovnik municipal area.

The impacts of the proposed development are considered in relation to the World Heritage property itself, its buffer zone and its overall setting. The impacts of the present derelict situation and the proposed redevelopment are compared based on the six specific attributes listed above.

The impacts themselves are identified as:

- environmental impacts (noise and vibration, vegetation, light pollution);
- cumulative impacts (local economy, tourism management, community infrastructure, road traffic);
- visual impacts (context, setting, historic importance, character, associative and perceptive qualities);
- World Heritage Property management objectives.

The HIA again follows the ICOMOS *Guidelines*' recommendations on grading impacts on the six identified attributes.

The HIA rightly concentrates on the visual impacts of the project, since "The experience of historic approach to Dubrovnik by land or sea indisputably has a high intangible value". This has involved 3D modelling of the proposals by 3LHD, which provide visualisations from key viewpoints showing the present and proposed conditions. These visualisations are supplemented by geometric model visualisations independently generated by the HIA author himself.

The impact of the 1985 hotel on the World Heritage property, buffer zone and its setting was reassessed to provide a baseline with which the new project could be compared. The HIA concludes that the 1985 building "moderately affected the overall setting of the World Heritage Property and compromised intangible associative and visual (inter)connections of the World Heritage Property and the wider setting".

The conclusions of the impact-per-individual-attribute assessment of the new project are:

- No change on the historic communication routes and buildings;
- Neutral or slightly beneficial (due to expected forestation) on the strategic position;
- Slightly beneficial on the everyday perception and appreciation of the landscape as well as on the historic urban landscape and fortifications landscape due to better design integration relying on extensive landscaping reflecting and preserving the existing area of cypress woodland in the northwest and the area of native shrubs to the east.

“Mimicry strategies” such as giving roof gardens the appearance of the surrounding landscape will also be employed. Any surviving underground features from the demolished hotel will be filled with soil to allow for the planting of large trees. The existing geomorphology will be respected and the natural coastline should be fully protected.

Four detailed groups of mitigation measures are identified and described:

- Mitigation measures already implemented during the process of preparing and drafting the Amendments and Updates to the City of Dubrovnik spatial plans.
- Mitigation measures to be implemented during the design development process which will be controlled via the planning approval purpose.
- Mitigation measures to be implemented during the construction process.
- Mitigation measures to be implemented during the occupancy period e.g. woodland maintenance and control of light pollution.

The overall assessment of the impact of the new project is “slightly beneficial”, subject to “all mitigation measures being fully and consistently implemented in the subsequent phases of the Redevelopment project”.

The HIA concludes that the development will have “mildly positive” effects on the attributes of the World Heritage property and will reduce the negative effects of the present ruined building. However, the site will require continuous extensive landscaping and maintenance. If this work is carried out, the redevelopment “would contribute to restoring the overall visual integrity of such a prominent WHP setting location”.

Discussion and Conclusion

In terms of land use, the site already has an established use as a hotel and this is unlikely to change. There is no indication that any other use e.g. housing has been considered.

The HIA is extremely thorough, meticulous and clear and easy to use. It is clear from the HIA that the present building, even in its ruined condition, continues to have a negative effect on the setting of the World Heritage property and now on the newly-approved buffer zone extension.

The new project proposals, if fully implemented, and, in particular, the landscaping carried out and maintained and the potential light pollution controlled, will improve the situation, particularly the views eastwards out from the Old City and Lokrum. The new proposal will to some extent reduce this degradation through the design of the buildings and the landscaping and “in the long term and with continuous intensive landscaping”.

The restitution, rehabilitation and maintenance of the cypress woodland and natural vegetation are absolutely critical to the potential success of the scheme as demonstrated by the visualisations which all assume that this will be the case in ten years time.

This Technical Review therefore endorses the conclusion of the Heritage Impact Assessment that the Belvedere Redevelopment Project as designed by 3LHD is acceptable and can proceed carefully, strictly adhering to all mitigation measures and other spatial planning guidelines.

The Technical Review notes that building permits can only be issued if the Detailed Urban Plan is annulled, a new Detailed Urban Plan is issued and the necessary revisions to the *Spatial Development Plan of the City of Dubrovnik* and to the *General Urban Plan of the City of Dubrovnik* are enacted.

If the project proceeds, then ICOMOS would recommend that a progress report should be sent to the World Heritage Centre.

If the project does not go forward for any reason and a new scheme is proposed, that scheme would require a new Heritage Impact Assessment to be compiled and submitted to the World Heritage Centre, in line with Paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention* (UNESCO, 2017).

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
October 2018