

ICCROM Comments on the draft IMP for the Historic Centres of Berat and Gjirokastra 2023-2030 (Version 15.02.2023)

General Remarks

The draft IMP as submitted on 15.02.2023 contains all relevant sections and a wealth of information both from existing datasets and from an extensive stakeholder engagement process reflecting a huge effort. This is an excellent basis for a comprehensive management plan and gives a clear overview of the status quo. However, the nature of the plan is still focusing on the present/past with limited information and planning regarding the future development of the property. The draft IMP follows in general the provisions of Decision No 169 20022020.

Being in the drafting stage, **several sections are yet to be completed and could not be commented** (e.g. Chapter 1 Executive Summary, Chapters 3.7., 3.8., 3.9., Table on values assessment on p. 75, Chapter 4.2., 5.1., 7.1. as well as Chapter 8).

Whereas the structure is well elaborated, the contents are hard to follow (e.g. long tables and lists, **uninterpreted information** from stakeholder consultation). Particularly regarding information collected from stakeholders, it is important to interpret them (in a management context) and pick relevant information. It could be useful to just include meaningful results in the main report, whereas the stakeholder survey results report is part of the annex. The rich **information collected from the large stakeholder workshop in September 2022 seems not to be considered or followed-up.**

The draft IMP presents a well elaborated vision and linked long-term goals and specific objectives. However, it still **lacks a connection between the objectives and the proposed actions and indicators.** Thus, it **remains unclear how the objectives could be reached** (and measured with related indicators). It is important that **each specific objective is connected to at least one action in the action plan** even if no funding is yet available but needs to be raised in future. Annex 3 (Indicators) provides valuable information regarding potential indicators as well as some actions to reach objectives but it was not visibly used in the main document.

According to Decision 37 COM 7B.70, the IMP should propose an **overarching integrated strategy.** A **common approach between the two cities is not yet visible** but rather puts information on the individual component parts next to each other without reflecting how coordination, communication and collaboration between the two cities could or will be organized. It still falls short in addressing the serial aspect of the Property.

According to Decision 39.COM 7B.75 (2015), a **risk management component** should be included. Whereas the IMP presents an overview of existing risks, it **falls short on how the management will address these risks (or what the process could look like)** (e.g. for mitigation/prevention, emergency response and rehabilitation in the case of disaster).

The aspect of **management and governance still remains vague, and it remains unclear who does what with whom for managing the site and making decisions.** The draft IMP very clearly elaborates the mandate of all actors involved and describes them but does not specify what they actually do within the frame of managing the site (and implementing the IMP).

Overall, the draft IMP is an ambitious effort with extensive relevant information which is an excellent **planning basis.** However, there is still a gap in creating a clear link between the status quo and needs with the vision, objectives, actions, and indicators. The **next steps of the work should thus focus**

particularly on a) actions related to the objectives and b) more clearly elaborating the management, governance and decision-making structures (how the plan is going to be implemented). Without an outline of future actions and clear responsibilities for their implementation, there is a high risk that the document will not be used in practice (and not being implemented).

As a minimum, the IMP needs to contain:

- 1.) A synthetic assessment of the Status Quo summarized in the SWOT
- 2.) Long-term and specific objectives how the SP wants to achieve to maintain the OUV
- 3.) A list of actions directly contributing to the specific objectives (incl. a rough estimate of resources needed)
- 4.) A clear description on governance and management setting in each municipality and description of arrangements for cooperation/communication between the two municipalities
- 5.) An estimation of (human and financial) resources needed to implement the management plan and coordinate the actions of the action plan

The draft IMP is a valuable but yet incomplete baseline document but is not yet a planning document. The way the document is organized at the moment cannot be considered a management plan and several essential sections (e.g. implementation) are completely missing. Thus, it requires substantial revision, reorganization and a concerted effort particularly on the planning, governance and implementation aspects.

Specific aspects

Governance and management (essential revision needed)

The governance and management aspects still remain unclear. The document does not specify who is responsible/accountable for what. Whereas the stakeholder descriptions include an overall outline of the mandate and role, it does not specify which role they take in the implementation of the management plan, how the actors are coordinated and how these mechanisms look like.

For the governance section it is highly recommended to include a chart/organigram of the main actors and their connections (for Berat, for Gjirokastra and for the overarching governance) to have a clear overview of the governance and management system.

The document also does not mention the processes of interaction between the multitude of actors or how the interaction with the community could or should look like. According to 108. Operational Guidelines, "Each nominated property should have an appropriate management plan or other documented management system which must specify how the OUV of a property should be preserved, preferably through participatory means." Similarly, the MO 5 states that collaborative governance and community engagement should be developed but does not make any reference to the HOW this should be achieved in any section. The draft IMP still falls short on the HOW.

In the governance section, I would also expect a description of the workflows, processes, exchange and communication formats, working groups or existing coordinating committees and bodies for each of the component parts, but also for the overarching coordination. **The team should present in this section how the stakeholders are coordinated and which formats and processes are/ will be established for it and also think of actions needed to get there in the long run.**

There has been an ambitious and highly promising start (e.g. during the stakeholder workshops in September) that could present a starting point for participatory formats and stakeholder coordination. Unfortunately, the results seem not have been followed up (or have been followed-up but are not presented in the draft IMP).

Planning logic and action planning (essential revision needed)

A management plan should basically follow a **clear planning logic**. Based on the status quo/SWOT and the legal/social/economic context, a vision is formulated (how it should look like in the far future). Strategic/long-term objectives give direction on the fields of intervention and specific objectives describe what should be reached as a result within the 8 years (as a contribution to strategic objectives). This is supported by concrete actions linked to the specific objectives. Progress is measured by indicators including a baseline value and target value.

The IMP includes a thorough description of the status quo, a clear vision, goals and specific objectives. It also includes an (incomplete) action plan. **However, the action plan and the objectives are not connected. It remains unclear how the specific objectives should be reached (which actions are needed) and how their achievement is measured** (indicators with baseline and target information).

The monitoring indicators are abundantly available (ICOMOS 2016) but have not been used. **It is recommended to refer to indicators with regards to specific objectives (baseline and target values).**

As of now, the action plan only includes current actions but no future actions. This does not allow for proactive, future-oriented planning or being aware of a funding gap. The IMP should be valid for 8 years but there are no actions defined for future interventions (meaning the IMP is obsolete once the already planned actions are completed). If essential actions to reach the objectives are defined in the IMP, it will be easier to a) lobby for specific funding or integration of smaller actions into other projects/programmes, b) have a clear idea when approached by donors, c) to check whether a proposed project is in line with the objectives and actions needed. **Each specific objective should be addressed by at least one action irrespective of currently available funding.** It would be the task of the managing authority to raise the funds for implementing these actions.

Furthermore, there are actions that do not necessarily need explicit project-based funding (e.g. establish a formalized frequent exchange call between the two mayors, to inform relevant authorities about heritage related processes, define a process for intercity cooperation, to participate in urban planning meetings or to lobby for legal adjustments). **The action plan should include as well needed actions that are not necessarily linked to major investment projects but addressing less tangible aspects of management (as derived from specific objectives).**

Examples:

	Long-term goal	Specific objective	Related Action	Responsibility	Funding need	Indicator	Baseline	Target
MO 5	<p><i>Implementation of the integrated management plan for the WH property</i></p> <p>The Integrated Management Plan for the historical centers of Berat and Gjirokastra is implemented and integrated with other local strategies and general development plans of both cities.</p>	Collaborative governance and integrated estate planning to be effectively established.	Develop a cooperation process and format for frequent exchange between Berat and Gjirokastra to discuss common issues			Number of intercity meetings/year	0	2

MO 1	The OUV and its attributes, as well as other cultural values and related heritage are protected and maintained in their built environment and wider cityscape, lived, understood and appreciated by the residents and visitors of Berat and Gjirokastra Districts.	Historical sites and built heritage of cultural importance are protected and conserved to ensure the continuity of life and their sustainable / coherent use in the future, in a fair relationship between vital needs, economic activity and heritage protection.	Revitalization bonus			Number of buildings benefiting from the revitalization bonus / number of buildings in good condition		
		To minimize the phenomenon of uninhabited buildings, through the implementation of policies and regulatory measures.	Revitalization bonus			Number of uninhabited buildings		
			Mapping of uninhabited buildings					
			Development of a programme to revive uninhabited buildings					

Risk management section

The risk management section includes elements of disaster risk, but also general SWOT analysis elements. The main risks (landslide, (wild)fire, seismic activity, flooding) are identified and described and an overall risk assessment of the monuments is presented.

Some aspects mention a) risk prevention /mitigation measures or b) recovery rehabilitation needs. A description of emergency procedures is not included. Next to a description of the main risks (e.g. fire, where is it relevant, which elements of the property could be affected), it should also propose mitigation measures (e.g. as mentioned in the draft IMP: improvement of electric installations, smoke detectors) and emergency response procedures (e.g. discussed with firefighters during the WS; communication with which authorities, prioritization list for firefighting).

Any gaps identified (e.g. no firefighting infrastructure would be gap and should be included in the action plan). Ideally, it should describe also the process (e.g. what happens if a fire breaks out, what to do, which process to follow etc.). Considering an integrated perspective, I would assume that there is already a local authority in place (i.e. firefighters) which would need the corresponding protocol.

The risk management section should be restructured along the main risks, describing them and outline responsibilities and processes for risk mitigation, emergency response and rehabilitation. All gaps and needed actions to get there, should be included in the action plan.

Remarks/ Comments per chapter

* Please note that the original document has a discrepancy in the numbering of main chapters and sub-chapters, and this document follows the numbering provided with page numbers.

Chapter 2 Introduction

This chapter well explains the formal need of an IMP detailing related decisions and the historic development. For the reader (and all relevant bodies), **it is recommended to add a section on purpose/function of the IMP**. There is not only a formal need for it, but as a plan it shall fulfill a practical function (e.g. give orientation to stakeholders regarding the objectives for the property, to serve as supporting instrument for HIA for development projects, to be used to approach donors to fund relevant actions etc.). Any management plan shall also fulfill a practical function to guide decisions, to develop actions in pursuit of a clearly defined objective. I think it would be helpful to gain more clarity regarding the function of the document if a section is included here.

p. 13 and 14 contain a long list of stakeholders followed by a narrative description of general mission and competencies of the individual stakeholders p 15-20. To improve legibility, **it is recommended to move these to the annex as supplementary information.** In this chapter (Stakeholder consultation). The description of the stakeholder roles and mandates are also an important basis for the governance and management chapter.

The large stakeholder workshop(s) attended and supported by the international consultants is not mentioned – and further on also not integrated into the document (e.g. in terms of governance, role of actors, necessary actions etc.). **As a key event of the elaboration, it should be mentioned both in the methodology and its findings included in the IMP where appropriate. The team should go back to the documentation of the workshop, and identify relevant information to be included.**

Pages 22-30 present the survey results. However, they are not interpreted but included in a raw format. Whilst containing relevant information, results should not be presented in the section on stakeholder consultation but rather attached as a **separate report in the annex. Relevant figures should be included in the text and interpreted** (e.g. p.24, Perceived State of Conservation by stakeholders: This should be mentioned when reflecting on the SOC. This needs be a) reflected (it is the perception of stakeholders not necessarily the real SOC) and b) used to describe the State of Conservation in the corresponding section).

P 30-33 have nothing to do with stakeholder consultation or methodology and is duplicated in other sections.

P 36: Best practice: The draft IMP lists only best practices but makes no references a) why it is a best practice and b) how and which information of it was used in the draft IMP. **The team should reflect why they picked these good practices and which aspects they integrated in the IMP.**

P 37-41 Analysis of legislation in force: This chapter gives an overview of all relevant laws, acts and regulations. It is mainly descriptive but rather than describing the laws as such, **it should more strongly focus on how it affects the management of the property, which challenges arise from the legislation and to which extent it is currently implemented in practice.** Whereas the description is comprehensive, the analysis is extremely limited. The paragraphs on detailed permit processes are too detailed in this part and not relevant here.

P 39 Here the General local plans are mentioned as important documents for local development. Here **it is important to include: a) what are the plans currently in force, b) how do they address/integrate WH issues and c) whether the development aspirations and plannings support or contradict property related objectives.**

P 39/40 The section on WH nomination and listing and the relevant criteria is a duplication to the description of the property and would better fit to the chapter on the description of the property.

Chapter 2 Description of the WH property

The description of the OUV is basically a copy-paste from the general UNESCO Website. It could be useful to **break down to the relevant attributes and values to better understand the OUV** and the “Condition assessment of heritage values” in the subsequent section (e.g. refer also to Annex 3 Monitoring indicators which includes a breakdown of attributes).

P. 43. The condition assessment of heritage values is extremely limited and gives no idea of the current condition of heritage values. This should be a **synthetic description of the current condition and**

should next to the perception of stakeholders also include information from the relevant SOC reports. This chapter is not developed at all.

P 44-53 Chapter 3.3. describes the property in detail in a descriptive manner, sometimes making reference to past investments and to further needs (which could be use to derive necessary actions for the action plan). For Berat, several times the question of traffic is mentioned – however, it is not found in the action plan. The whole chapter is varying a lot in terms of detail.

P.54. The chapter on integrity and authenticity of the property is very limited. I would have expected here a **more critical reflection, taking also into account past and current (development) trends and potential future developments that could affect it.** There is not a single reference to common aspects / connections of the both cities.

P. 55-58 presents an uncommented and uninterpreted list of past investments. Whereas this list could be put into the annex, it would be **important to describe here in a synthetic manner what these investments contributed to, if there was a focus in investments on certain aspects and how they supported the maintenance of the property.** Without interpretation and putting into a context, this list is only of limited relevance.

P 59. Risk Assessment: It is very valuable that a chapter on risks is included. However, it is not presented in a systematic manner mixing disaster risks, management issues, recommended actions, needs and gaps with anecdotal detailed examples (e.g. rocky limestones slopes in Berat). **I would recommend to take each risk identified in the first table on p 59 ,describe the type of risk, where it has already resulted in a disaster and what are the challenges related to it.** It also remains unclear how/who manages these risks. It also often mentions needed actions, these should be extracted and added to the action plan. A more detailed reflection is found in the section of this feedback report under “Risk management”. The figure on p. 67 summarizes the risk assessment. **All figures (in the whole IMP) require a description/interpretation.** It remains unclear whether the risks refer to landslides/fire/flooding or whether it refers to the risk that they are being destroyed (e.g. as they are not used). Context remains unclear.

p. 67-68: Here are several headings without any text.

P 69-74: Here are only zonation maps and photos without any explanation.

Chapter 3 Assessment of values of the WH Site

p.75 Assessment of values of the WH site. It remains unclear what the difference is between Chapter 3.2. Condition assessment of heritage values (p43). **The main table for values assessment is empty.** The table on p76 mixes attributes, values, challenges, indicators and necessary actions. The purpose of this table remains unclear. The subsequent text “Berat and Gjirokastra – two complementary historic city centres” is interesting but partly a duplication of the description of the property. It describes the property and its attributes (which is also part of Chapter 2). **For the reader, it might be confusing to first read about individual monuments in Chapter 2, finding then a detailed description of the property some 20 pages later. For the whole plan, the authors should take care that it does not duplicate confusing the reader.** Furthermore, this chapter is not really an “assessment of values” rather a description of the property.

Chapter 4.2. “Assessment of other associate values” is empty

Chapter 4.3. Conservation and protection measures in function of values” represents a descriptive classification of values, movable cultural property and mentions the national inventory of cultural

heritage. However, the section does **not include any information about measures as indicated in the heading. Whilst it remains unclear what is meant by the heading, the subjective interpretation would be that here ongoing measures, processes and actions already in place are mentioned.**

Chapter 4 Other Aspects related to WH Sites (p. 83-86)

This chapter strives to describe the wider context of the property referring to social-economic and touristic development. **This chapter is very raw with void sections.** I would have expected here an analysis of main livelihood aspects, population dynamics, economic development in different sectors and how they affect the property. Same is valid for tourism development, it only refers to registered collections and number of visitors but gives no indication at all how tourism infrastructure in the city centres is organized, how it has developed and how it supports/affects the property. The further subheadings jump between periphery, Berat, Gjirokastra, museums, natural sites without a recognizable order.

The final concluding chapter “5.3. Values, SWOT and management issues” (p.86-87) should basically summarize the Status Quo, the foundation of the management plan summarizing strengths, weaknesses, threats and opportunities in relation to the OUV/values derived from the stakeholder consultation, the analysis of legal conditions, ongoing development, document review and assessment of risks and values to have solid base for vision, objective and action formulation. However, **this chapter only presents unreflected results of the questionnaire not taking into account other information. The team should make sure that the SWOT integrates ALL findings and that the contents are reflected in the objectives and the proposed actions.**

Chapter 5 Vision, aim and objectives (p. 88-93)

This chapter includes the overall vision, 5 management objectives, all with a stated long-term goal and specific objectives to be reached in the next 7 years. This was discussed and agreed in a participatory manner during the workshops held in September 2022. It is very valuable to have agreed objectives. The team should make sure that the objectives reflect both the values and attributes of the property but also the results of the SWOT analysis.

The total of 26 specific objectives to be reached in the next 7 years is ambitious. At this planning stage, the objectives are not further specified often being very general. Here **it would be essential for the team to define “what in specific should be achieved for these objectives”** (e.g. MO4 “increase employment opportunities in the buffer zone”: If this is an objective, it must be clear what should be done to increase them, how this should be achieved and who should do it). Thus, it is recommended for the team **to have a look at each objective and define what the contribution to this objective should be** (e.g. develop and fundraise a project for craftsmanship businesses, build up a visitor centre with employees...). Unless this is discussed and reflected in the action plan, there is a) no way to achieve the objective and b) no way to measure progress towards this objective. (see detailed comment on planning logic).

Example: “MO2, spec. objective: “Traffic, transportation infrastructure managed with an emphasis on protection of landscape” – here it should be clear what the process is. I would assume it is not IKTK in charge of it, so it must be clear how to address the stakeholder in charge so that it is a) aware of it that there is an objective, b) that the body feels responsible to do it and c) to implement it. This very well shows the integrated nature of the objectives.

Some objectives also already include recommended actions (e.g. update of administration plans and technical guides, clear definition of competences etc.). **The team should revise the objectives and make sure that relevant actions are moved to the action plan or further reflected there.**

Particularly MO 5 includes a lot of specific objectives where it remains fully unclear which actions will be taken to achieve them.

P92-93 include pictures of the stakeholder workshop in September 2022. This would fit better to the methodology chapter where this key event is mentioned under "Stakeholder consultation".

Chapter 6 (Governance / management) (p. 94-102)

This chapter should describe how decision-making, and responsibilities of individual actors involved in the management of the WH property are organized. As of now it does not sufficiently describe how the system looks like. It **remains unclear who is responsible for what in specific even though it provides a detailed description of general powers of a wide range of actors involved.** It is not mentioned how these bodies interact for managing the property nor does it mention arrangements and powers in the context of Berat, Gjirokastra and of coordination between the two. The section describes in detail the existing legal processes (e.g. permits) which are an essential element but a "passive" way (i.e. reacting to development efforts by others). However, also referring to the objectives, there are many objectives that require "active" development. Who does that, who has the mandate for it, who is responsible and accountable for it?

A very simple question (illustration example): Take MO 4 (4th specific objective: increased employment opportunities in the buffer zone): If nothing happens, who is responsible for it? Who is accountable? Who develops measures for it? Who pushes if nothing happens here? What would be the process / structure here?

Here a more practice-oriented section would be useful. This could be for instance organizing it not by institution but per field of responsibility (e.g. Integration WH aspects into territorial planning: main responsibility/mandate: XX, involved: XY, YY, ZZ), same for risk management, tourism development, maintenance of objects/buildings, community engagement etc. in any case it should also include an overview:

- **how intercity communication is ensured and organized (e.g., which meetings should take place)**
- **how community involvement should happen (exactly)**
- **how the individual institutions involved are coordinated (and by whom).**
- **Which committees, councils etc. exist, how they are composed, what they do/decide and how often they meet and what they mandate is**

P97 "categories of transformative development projects"

This chapter is informative but neither related to governance or management and by far too detailed for the management plan.

P101 (Chapter 7.1.). Empty chapter

P101-102 (proposals for change and improvement of administration model)

This section does not contain proposals for changes or improvements. The Committee is interesting and relevant but would rather fit to the overall governance chapter defining its role, composition and mandate (maybe a chart/organigram would be useful).

Chapter 7 Action Plan

The draft action plan contains headings of specific projects but gives no idea which objectives they contribute to. **The team should make sure that the actions are clearly linked to individual objectives and that each specific objective is reflected in an action.** Only objectives with actions can be achieved and measured. In terms of presenting, it could include a column making reference to the specific objectives addressed (e.g. number/ID) or mention the main actions included in this large projects.

The draft IMP includes several smaller actions that cannot be packed into large investment projects (e.g. awareness raising through annual stakeholder meetings, monthly calls of mayors to explore common fields of cooperation, definition of working processes, preparation of proposals, lobbying, organizing intersectoral meetings for coordination....). This particularly refers to MO 5 but also to all other Main Objectives.

The Action Plan should clearly show what will/should be done in the next 7 years to achieve the objectives set. As of now, it remains completely unclear.

Chapter 8 Implementation and Monitoring

This chapter is yet completely empty. The team should clearly define **HOW this management plan will be implemented and also how it is monitored to which extend the objectives are reached.** A simple reference to an overall presentation of monitoring indicators as developed in 2016 is not sufficient. It should rather link the proposed indicators with the objectives presented in Chapter 5 and present the process and responsibility of monitoring, analyzing and using them.

The main purpose of indicators in this context is to be able to ASSESS THE PROGRESS MADE towards achieving the objectives. The team should think how it wants to use the indicators in the management process and how they want to collect, analyze and use the monitoring data for management.

The team should think of an initial review (after 1-2 years) as a basis to revise indicators or actions and to include an intermediate review of the IMP (e.g. after 3-4 years) to reflect on the progress made.

Potential steps for the revision of the draft IMP

- Clearly assign a person that ensures that the whole document is consistent and complete
- The team should organize an internal meeting to discuss the recommendations as soon as possible
- Revise the structure along the comments
- Write the individual sections in a more reflected synthetic manner interpreting the available data and their relation to heritage
- The team should start revising with the key elements:
 - integrated SWOT analysis
 - Revising the action plan in line with the SWOT results and the formulated objectives (there is already a wide range of actions included in the texts presented)
 - Starting the revision of the governance and management chapters by building organizational charts to get a clearer picture and then thinking of actions/processes how these organizations interact
 - The team should particularly invest into elaborating HOW this management is going to be implemented (i.e. its actions) and coordinated.
 - The team should consider going back to the main actors to discuss the proposed actions and governance system for validation and taking them on board.

Final conclusion

The draft IMP is valuable collection of information containing a huge amount of data collected also via participatory means. This is highly valuable. However, the planning (the look into the future) is still widely missing and it is not yet elaborated how this should be achieved (governance and management). These are essential elements of a planning document, thus essential revision, restructuring and also planning is still needed. Unfortunately, several incomplete or missing sections did not allow for a full assessment of the document.