

ICOMOS Comments on the draft Integrated Management Plan for Historic Centres of Berat and Gjirokastra 2023-2030 (version 15.2.2023)

Overall comments

The document gathers much information and represents a good basis for the development of the Integrated Management Plan. It is noted however that some key aspects are relegated to annexes – e.g. Annex 3 on attributes and indicators – which would benefit from being re-elaborated and included in the main text; on the other hand, part of the main text would be better placed in the annexes and only a summary of it presented in the main text of the document.

As this is still a draft, some of the key paragraphs have not been drafted yet and there is no indication of what type of content is to be expected. It is important that the information therein is relevant for the development of objectives and actions and not simply descriptive. This consideration also applies to paragraphs or chapters that have already been completed.

So far, the document does not yet have the profile of a planning/programmatic document, as it is still too descriptive and not oriented to prepare the groundwork for the programmatic part, which remains rather underdeveloped at this stage. Further work is needed to ensure that this draft document can become a planning/ programmatic one able to support and orient the management actions.

It is noted, with some regret, that the richness of the debate that emerged in the two workshops held in Gjirokastra and Berat, is not reflected in the document so far compiled. It is hoped that the outcomes of these intense days of reflection, brainstorming and discussions can be harnessed and integrated into the final version of the IMP.

Comments on the structure

The articulation of the document reflects a ‘desktop’ approach rather than a planning approach. The executive summary may also include a paragraph explaining how to read the document, the content of each section/chapter, and what users can find in it.

Instead of “Introduction”, it is better to call that section/chapter “Background information” because this is what it is and would be more useful for the document's readers and users.

The distinction between chapter 3 on the description of the WHP and chapter 4 on the assessment of values is not clear. It seems that the identification of attributes should go with the OUV and not as a separate item in another chapter.

Chapter 4 could be better focused on the state of conservation of the property and its attributes and on trends in its state of health, from a physical perspective but also a socio-economic one. This chapter could be more useful if it presents a sort of ‘diagnosis’ of the state of health of the property based on an analysis of the situation – all the documentation that has been produced and gathered so far, including SOC reports and World Heritage Committee Decisions and the work done in 2008 for the attributes and monitoring indicators, provide a good picture of the state of health of the two cities and of the challenges they face. This section should be clearly identifiable in the document because it forms the basis for defining objectives and planning actions to achieve those objectives.

Since there is overlap between sections and some topics are addressed in different sections/chapters,

it is highly recommended that once a robust structure is agreed upon, which demands the revision of the one proposed in the draft, an indication of what each section/chapter should include should be set out in a master document to guide the compilation of the various sections avoiding repetitions and helping the different compilers of the various chapters. A final reading of the document by key actors in the management as well as by people that were not involved in the drafting would help to achieve clarity.

Comments on each section

Executive Summary

This section is not developed yet so no comment can be made. However, it is suggested that this section briefly recalls why the property is important for all humanity, which are the obligations stemming from the WH status, the key elements of the management system and how the IMP intends to address issues and achieve management objectives. An indication of how the IMP is approved and becomes a compulsory engagement for the subscribers is also important to be set out, as well as the modalities for its update and modification, when and where needed. A guide for readers and users is recommended, by providing a summary of what can be found in each chapter and in the annexes.

Introduction

Apart from the suggested change in the title, it is recommended to significantly shorten this part and to put most of the text in the annexe. It is not necessary, in a document which is expected to be of use, to provide a lengthy description of the methods and processes carried out to develop it. What might be important is to explain the outcomes – how the plan has been conceived and developed, as a result of the methodology and the consultation. For instance, it is not considered necessary to report how many meetings have occurred in consultation with the stakeholders; what is important is to set out who are the main actors (stakeholders and shareholders) for the implementation of the IMP.

The description of the responsibilities of each institutional actor should be more focused on the role played in relation to the property, and not be limited to describing their mandates as indicated in the relevant legislation. It is important to indicate what role each institution plays and what role could play in the management of the property, based on their legal mandate, and what relationships and actions are in place on which synergies, communication and collaboration could or should be sought.

For instance, the specific role (and stake) of the two Funds (FSHZH and AADF) in the two cities would need to be set out more clearly: understanding what projects have been supported or are being supported, with whom these projects have been negotiated, who benefits from them, how these agencies can be involved in implementing actions related to World Heritage management objectives, are all very important aspects for management. The present and potential role in the process of all the institutions mentioned in the table concerning the mission and competencies included in this chapter would need to be clarified and set out.

Furthermore, it is not clear from the mandates of the National Institute for Cultural Heritage and the Ministry of Culture why these are the institutions developing the IMP and why no other actors, e.g., the local municipalities or other relevant bodies, are not part of the working group. Municipalities are key actors in the management of the two historic cities, even within heritage-protected zones; therefore, the involvement of their staff in the development of the integrated management plan is crucial to be sure that the plan takes into account the current reality, conditions and dynamics within the cities and can be implemented. Otherwise, there is a risk of developing a document which is disconnected from the present situation and will not be useful to guide management.

The statistics presented in the introductory section would be more useful and informative if they were commented on and interpreted and not simply put into the document without an analysis/ synthesis

of the outcomes. The set of questions for the interviews is not necessary for the main text and should be placed in an annexe.

The articulation of the institutions related to cultural heritage is presented separately from other stakeholders and is partly overlapping with it (pp. 30 – 33). If all this information preludes to the discussion of the management system, then it should go in a chapter on the governance and management system, otherwise as presented now, it appears unclear and confusing.

The aim of the sub-chapter on best practices is unclear. The information provided in it is too general to be indicative of what ways, in practice, the drafting team has examined the examples and drawn specific lessons to develop the IMP for Berat and Gjirokastra. As such, reference to examples of possible best practices is not meaningful in terms of impacts on the way in which the IMP is articulated, on its possible management strategies, or on its mechanisms for implementation.

Some information is provided with regard to the means for implementing protective measures on protected monuments by the MoC's institutions; however, this is limited to the issuance of permits, which is an important element but is not sufficient to ensure the effective safeguarding of all the attributes of the property, as a number of them are not tangible and related to the socio-economic dimensions of the property; hence it is difficult that building permits only can be seen as tools that can proactively sustain the conservation and transmission to the future of heritage values, including OUV.

On the other hand, nothing is explained with regard to how more proactive instruments, such as environmental or heritage impact assessments at the project or plan level (strategic level) are embedded into the legislation and are harnessed by the cultural heritage institutions to ensure that planned projects or plans do not affect negatively the OUV of the property but can, on the contrary, contribute to sustaining the attributes of OUV.

At this stage, the sub-chapter on the provisions of the urban masterplans for Berat and Gjirokastra is not developed yet but it is important that key information is presented on the provisions of the plan and on how they consider the OUV of the two historic cities. If criticalities arise, these need to be clearly set out, if not in the description, in the chapter concerning the state of conservation and affecting factors (ideally chapter 4). Furthermore, the document does not address whether other special plans have been proposed or adopted by other national agencies or through cooperation with international donors and how they would address the need to preserve the OUV or could be harnessed to achieve objectives supporting OUV and overcome the challenges detected in recent years.

The history of the proclamation as World Heritage should not be mentioned in this chapter but in the chapter concerning the OUV of the property, to avoid repetitions.

Description of the property (chapter 3)

Chapter three contains interesting information but would benefit from the reordering of the section in a way that OUV and attributes are easily identified and understood. Consideration of the geographical location of the two cities, the locality, geomorphology and their role in defining the specificity of the urban structures of the two cities and of their focal points would be also important to consider, as the large-scale attributes are important for the recognisability of the two cities and of certain dimensions of their Historic Urban Landscape. The document would benefit from some sketches, images or other graphic representations to illustrate the mutual spatial relationship of the key attributes in the cities and assist in a better understanding of the content of the chapter/section. The description of the property can also integrate the outcomes of the exercise carried out in 2008 on attributes and monitoring as a way to structure the attributes of the two cities at different scales. The

reference to the maintenance and conservation needs is important, but might perhaps be included in the management and protection requirements and in the integrity section. A number of conservation needs are expressed in this chapter/ section which could be associated with objectives and for which specific actions could be planned/ designed to be funded and implemented (e.g., p. 47, the castle still needs restoration works and rearrangement of its infrastructure, p.48 need for continuous maintenance of the castle in Berat, pp. 48 and 50, restoration projects for frescoes in byzantine churches, p.51 need for stimulation of dwelling adaptation, issues related to accessibility – envisaging alternative solution to normal vehicular traffic?), p. 52 – need for a new vehicular bridge - how to address it without spoiling the value of historic city? All these are important points that would need to be further discussed in a programmatic section. Ideally, long-term goals and specific objectives should be commented and discussed and not simply set out as they are now.

The assessment of values and attributes should be part of the description of the property rather than being put in a separate chapter as it is now (chapter 4). The description of the property needs to be linked to the OUV and the understanding of the values and attributes of the property. Only when OUV, other heritage values and attributes are identified, will it be possible to understand the impact of the affecting factors, state of conservation, issues and challenges on those values. Discussing the state of conservation and the risks before understanding the values and the attributes, would not lead to an adequate assessment of the situation at the property and what would be needed to address criticalities, harness opportunities and pursue OUV- and attributes-based objectives.

Subchapter 3.5 on investments made on the property over the last years is limited to a table of projects but there is no appraisal of whether these projects are in line with the long-term goal of protecting and transmitting to the future the OUV of the property, ensuring the integrity of the attributes, and supporting their capacity to convey the OUV. Some further explanation of the revitalisation bonus mentioned in the table would be helpful in the appropriate section (e.g., management system or in the part concerning active conservation measures). It is also not clear who is the implementer and whether the project was completed, initiated or is still to begin. This table could be more usefully placed elsewhere, e.g., when discussing the current initiatives in the two cities and not in the chapter on the description of the property. These projects should also be tied to the management objectives and the needs of the property. How do they address needs, issues and challenges? How have they been decided? At what stage of implementation are they? What are the challenges in implementation and what are the positive outcomes so far? Other projects or projects proposals are mentioned in the text (e.g., pp.63 – 64 a project proposal for the conservation of the Berat castle and structural intervention for the stabilisation of its rocky outcrop are mentioned) but it is not clear at which stage they are and if there are intentions and funds to implement them.

The paragraph on risk assessment, therefore, would need to be discussed in a subsequent section/chapter. The sub-chapter on risks is synthetic but interesting and informative, however, some more information concerning the hazards to which the two cities are prone would be useful, if available. For instance, has Albania a seismic hazard classification map? Has a seismic micro-zonation study been made for Albania or the two cities? Are there hydrogeological and landslide vulnerability maps for the two cities? In any case, the description of hazards and the situation of the two cities already offer ideas about possible actions to be put in place to diminish vulnerabilities and disaster risks. A number of paragraphs are yet to be developed and would be very important to provide a full picture of the conditions of the property, the hazards and the vulnerabilities to which the attributes of OUV are prone.

Paragraph 3.10 refers to the legal status of the property. This section does not seem well-placed. This should be part of the chapter on the management system, under legal protection, which is one of the elements of the management system. Some explanation of what being included in the zoning plan

adopted by the Council of Ministers in 2014 and 2015 respectively for Berat and Gjirokastra entails would also be useful to understand the management system, its instruments and mechanisms.

A large part of Chapter 4 (indicated as three in the document by a numeration that needs updating) should be in chapter 3, as explained above. The table summarising the attributes includes not only attributes, but also issues and threats, and would therefore need to be reorganised considering the statement of OUV and the exercise on attributes completed in 2008. There is a long text on the complementarity of Berat and Gjirokastra: as much as this text is interesting to read, it does not seem to belong to a planning/programming document, unless some conclusions are drawn that are relevant for planning and management purposes. It is suggested that the text is summarised and only some key points are presented in the revised IMP as a basis to explain the management arrangements devised for the property. The distinctions between the residential buildings in Gjirokastra and Berat are very interesting and would be very useful to develop guidance on how to conserve, restore and rehabilitate these buildings whilst respecting their typology, conception and construction techniques.

Another very important point which is not explored in the draft document concerns the protection and sustenance of attributes. The draft contains information on protected heritage buildings according to national legislation, but they do not equate, or not totally, with attributes of OUV; as shown in the 2008 exercise on attributes and monitoring, some attributes because of their intangible nature may not necessarily be protected according to the existing legal framework. Intangible heritage would need to be sustained through proactive measures, rather than simply documented and listed, to be maintained and transmitted to future generations. It is therefore important that mechanisms are envisaged through the management to guarantee that those attributes are sustained through appropriate mechanisms or actions.

Other aspects related to the World Heritage site (chapter 5)

This section/chapter is unclear in its aim. It is still to be completed so it is very short and collects disparate information on tourism and cultural attractions. One key paragraph on socio-economic development is announced but has no content so far. It would be important to develop it.

The chapter also includes a summary of the results of a SWOT exercise. SWOT is always a very useful tool but demands some time for the re-elaboration of its outcomes. In this case, it seems that some further work is needed to clarify its content. In addition, it is noted that weaknesses and threats (and strengths and opportunities) are all put together. This aggregation however prevents an understanding of the endogenous and exogenous negative and positive factors in the property and its surroundings and makes it more difficult to harness this information for management purposes and devising strategies. Some textual analysis of the SWOT exercise, when it was carried out, who participated in it, who took part in the elaboration of the information and how this analysis can be read in terms of management planning would be required to make the SWOT useful and usable.

The vision is well set out, although there seems to be a mismatch with the pages. It is hoped that the text as formulated has been circulated among those who participated in drafting it, workshop participants and authorities, made known to citizens of the two cities and that the representatives of the Berat and Gjirokastra, i.e., mayors and municipal councils, adopted these visions as a basis for their action. At the national level, it would be good that relevant ministries are aware of this programmatic statement and confirm their willingness to abide by it. Such a vision should also be acknowledged by other relevant stakeholders, especially investors.

The long-term goals are clear. Perhaps a little bit too general in the sense that they could apply to many World Heritage cities. From the analysis carried out throughout the years, including the work done in 2008 on attributes, and the numerous states of conservation presented and discussed in the

World Heritage Committee, it is wondered whether more property-specific long-term goals can be envisaged. One would expect that based on the careful description of the property, and all the accumulated information on the affecting factors, the long-term goal could be more evidently tied to the specific long-term management needs of the property.

The link between long-term goals and specific objectives is also clear, although two things are missing: a link between the attributes and the challenges faced by them and the identification of actions or sets of actions (and possibly sub-objectives) to achieve the specific objectives. Some of them in fact are complex ones and would need some strategy to be set out, which includes projects and mechanisms to be outlined in a more detailed manner. Integrating the 2008 work on attributes with the more recent exercise carried out in preparation for the IMP would help strengthen the logical connection between attributes, their needs and challenges, the goals, the specific objectives and the actions.

Some objectives, i.e., linked to the hazard analysis, seem to be missing. The analysis of hazards, in fact, suggests that some objectives related to the management of risks would also be needed and some actions seem to be already implicitly suggested in the hazard analysis. A careful reading of the specific objectives may also lead to merging some of them into one and adding some other objectives related to other topics (e.g., risk management and path for collaboration between the two cities in specific management areas).

The action plan needs to be more consistently tied to the specific objectives and actions would need to be further developed. An explanation of what objectives certain actions would contribute to achieving and how would be helpful. At this stage, the actions in the action plans seem to be projects already in place but not really connected to the long-term goals, the objectives and the overarching aim to sustain OUV and its attributes. The action plan would then need to be revised to show more clearly the linkages between the attributes, the objectives and the actions. The action plan seems to require further work to be populated with actions addressing all objectives set out for the next cycle of planning.

It is important to indicate whether actions are ongoing or only planned. It is necessary to remind that, for projects that may have an impact on the Outstanding Universal Value, paragraph 172 of the *Operational Guidelines* needs to be applied. Hence, when infrastructural projects are discussed/conceived to respond to certain needs, it is advisable to inform the World Heritage Secretariat about them in advance of any definitive decision.

Governance

The chapter on governance addresses essentially how decisions are taken with regard to projects and plans, and so addresses only part of the management system. As a first consideration, the information provided here should be collected in one single chapter with the information provided earlier in the text on the tasks and competencies of the various institutions, in order to achieve a clear picture of the responsibilities and mandates of the institutions that, together with the legal framework, form the 'hardware' of the management system. One can observe from the description that the role of the municipality is important, although a crucial planning/regulatory role is played also by the National Council of the Territory. Which depends on the Council of Ministers; hence it is important that NCT is involved explicitly in any steering committee or governing body that may be established for the governance and coordination of the management of the serial property. An acknowledgement of the vision and of the long-term objectives for the management of property by the NCT would be very important. A formal agreement signed by all key actors mentioned in the governance chapter that engages them all in collaborating for the sustenance of the Outstanding Universal Value and related attributes of the property through an agreed and shared management instrument would be a good

way to bring to the table relevant decision-makers in the sphere of territorial development.

The chapter on governance should provide a picture of the overall management system as it stands, of the strengths but also challenges to address, and also explain how the issue of governance, coordination and collaboration among decision-makers can be overcome and a sound heritage-based governance can be pursued. The plan should document the process of setting up a coordinating/ steering/ governing entity for the property that facilitates synergies and collaboration in the management of the property and avoids contradictory decisions or actions.

Way forward to turn the current descriptive document into a planning/ programming document

The current document is a useful compilation of information and work carried out so far. It is still to be completed as a number of key paragraphs are not drafted yet; however, it is difficult to see this document as a draft management tool. This depends in part on the structure of the document, which would benefit from some revision and reorganisation of the content, and in part from a lack of focus on the planning/ programming nature of this document.

The textual part of a plan, including a management plan, aims at providing an explanation of how the plan is organised and is to be used. It is a document that should make it understandable to all parties what is to be achieved through the plan, how this is achieved, who are the actors, the timeframes, the modalities of implementation, participation, appraisal, modification and update.

Its content, therefore, is not simply descriptive but programmatic. Also, the sections concerning the description of the 'state of the art' or 'state of health' of the property are to be written thinking that the outcomes of the 'diagnostic' part, the needs, will be the basis for the programmatic part, the general goals, the specific objectives, the actions the resources that would be needed (and not only those available, including human resources).

At this stage what is needed to develop in order to finalise the document as a draft IMP is much more clarity about the attributes of the property, the affecting factors, challenges, hazards, and needs, as well as the strengths and opportunities for overcoming the issues identified for the property throughout the years and reinforcing its conservation and management. More focus should be put on the long-term goals, and objectives and particularly on the actions that should be more developed, in all relevant areas, including the management system and governance.

Annexe 3 which reports the work carried out in 2008 on the attributes, the target for each attribute, the challenges and the actions needed, is a key document as it represents the basic core of the possible Integrated management plan.

Building on this document and using the most recently collected information through interviews, workshops and visits on-site to update the conditions of the property and its needs, will lead the MP team to establish OUV- and attributes-based long-term management objectives, as well as short- and medium-term objectives/ targets to be achieved in the envisaged 7-year cycle of implementation of the integrated management plan to be developed. In Annex 3, there is plenty of relevant targets to be pursued for each of the identified attributes. With regard to the chapter on values and attributes, it is highly recommended to refer to the attributes mentioned in Annex 3 and, with regard to the state of health, issues, challenges and trends detectable in the two cities, as updated by the more recent considerable work carried out by the drafting team under this present International Assistance.

ICOMOS observes that the word 'integrated' in the title of the management plan would need to be better defined. It is understood that an integrated approach to management was recommended by

previous Committee Decisions; however, it is key for the State Party and the managing actors to agree on how this notion could be meaningfully understood for the two components of the serial property. As rightly noted in the text prepared by the drafting team of the MP, these two cities have elements in common but also their specificity in historic and cultural terms. They also are specific from a social and governance perspective, as these are two different municipalities, which are keen to maintain their identity. Hence, it is important that a path for strengthening collaboration be developed based on joint actions of common interest or responding to common needs and that actions to be undertaken are clearly outlined.

Finally, the document needs to be programmatic but adherent to the reality on the ground. It is crucial that the IMP does not become a desk document but a living document, known, used and applied. At this stage, the way in which it is presented does not suggest that it will easily become an operational tool. If there are issues that are currently difficult to tackle, it is better to acknowledge these difficulties and include actions that are meant to overcome those difficulties. For instance, if it is difficult to establish cooperation with some key actors, it is better to acknowledge this difficulty and consider steps to overcome this limitation over time. If some issues and related objectives are crucial, but there is no clear idea on how to achieve them, it is important to acknowledge this and see that you will be seeking guidance or exchanges in order to define possible actions that can address that particular issue.

It is understood that the State Party feels the need to deliver the document, also in relation to contractual obligations; however, in order to become an operational document that guides all stakeholders, this document needs to be further developed and discussed with relevant decision-makers and actors. Management is a process, and it is important that this process is kept alive. The IMP needs to be aspirational but also document and guide the process in the reality and not simply be a good deskwork.

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

ICOMOS, Charenton-le-Pont
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