



**Culture Sector**  
Division for Heritage

United Nations  
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منظمة الأمم المتحدة  
للتربية والعلم والثقافة

联合国教育、  
科学及文化组织

Mr Ivo Goldstein  
Ambassador  
Permanent Delegation of the Republic  
of Croatia to UNESCO  
1, rue Miollis  
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Ref.: CLT/HER/WHC/7922/HR/AS/KR 6 May 2015

**Subject: ICOMOS technical review of development proposals for the World Heritage property "Historical Complex of Split with the Palace of Diocletian"**

Dear Ambassador,

Please find enclosed a technical review of development proposals in the World Heritage property "Historical Complex of Split with the Palace of Diocletian", provided to the World Heritage Centre by the Advisory Body ICOMOS International.

May I take this opportunity to thank you for your cooperation and support in the implementation of the *World Heritage Convention*.

Please accept, dear Ambassador, the assurances of my highest consideration.

  
Kishore Rao  
Director  
World Heritage Centre

cc: National Commission of Croatia for UNESCO  
National Focal Point for World Heritage  
ICOMOS International Secretariat

## ICOMOS Technical Review

<b>Property</b>	<b>Historical Complex of Split with the Palace of Diocletian</b>
<b>State Party</b>	<b>Croatia</b>
<b>Property ID</b>	<b>97</b>
<b>Date inscription</b>	<b>1979</b>
<b>Criteria</b>	<b>(ii)(iii)(iv)</b>
<b>Project</b>	<b>Development proposals</b>

In September 2011 ICOMOS submitted comments to the World Heritage Centre (WHC) in relation to the development proposals at the Marjan and Ambassador Hotels on the western coastline of the port of Split and at the Contarini Bastion on the City wall. The State Party (SP) considered these comments and responded by providing clarifications and additional information on these issues to the WHC on 20 December 2011 and 20 February 2012. ICOMOS commented on this material in July 2012 and these comments were also forwarded to the SP. In November 2012, following criticisms of the Conservation Department of Split by a group of residents, calling themselves 'the Genius Loci of Split', the WHC asked the SP to respond to these criticisms and also asked for updates on the following issues still outstanding since July 2012:

- Submission of the final proposal for the Contarini project;
- Designation of Zone B as the buffer zone of the World Heritage property;
- The most appropriate design for the construction of the Hotel Ambassador;
- Progress concerning the infrastructure project in the Eastern Part of the Ports.

The WHC also asked for an update about the progress with the Management Plan of the property. In April 2013, the WHC repeated this request for information from the SP, and the SP replied to these various requests in January 2014 providing additional information on the state of conservation. ICOMOS provided a technical review of this information in April 2014, which was transmitted with a request from the WHC for further information and clarification from the SP. The WHC also drew the SP's attention to a further complaint from a group calling itself the "Civic Initiative Split", which the WHC had received in December 2013. The SP responded to the WHC's letter in October 2014 and this latest material received from the SP is the subject of this review which has also taken into account the draft retrospective Statement of Outstanding Universal Value (draft RSOUV) submitted by the SP and reviewed by ICOMOS in December 2014.

### ***The Contarini Project***

The project has two parts: a) the construction of a residential-business building and b) the major conversion of the Contarini bastion itself.

The SP has now confirmed that the design of part a) received approval in 2012, although ICOMOS notes that the "Civic Initiative Split" says that approval was granted in 2013. The SP has re-submitted the small scale plans and elevations of this building.

In response to the specific concerns about this building's design previously expressed by ICOMOS, the SP has now replied that "since this is an entirely modern building in the scope of the existing residential bloc the selection of the colours and materials for external surfaces has been left to the

architects with a recommendation to give priority to natural materials such as stone and wood". It must be concluded therefore that the approved design has taken no account of ICOMOS's concerns.

In answer to ICOMOS's request for clarification as to when it was proposed to implement the proposal, the SP has responded that the investor had announced the beginning of works "for beginning of 2014". Presumably therefore the work has started, although this is not specifically stated by the SP. The only available satellite imagery (which may be outdated) still only shows the site cleared for construction.

No information is provided about the second element of the Contarini project: b) the major conversion of the bastion itself.

The SP states that "no interventions were made in the area that would jeopardise the value of the World Heritage property", however a contrary view is expressed by the "Civic Initiative Split". ICOMOS previously expressed concerns about this project which seems to exemplify the comment in the draft RSOUV that "small scale incremental change within the property could have an adverse impact on the OUV".

The SP makes no specific reference to the criticisms made by the resident's group the "Civic Initiative Split" forwarded by the WHC.

#### ***Buffer Zone***

The SP states that in its view, it is not necessary to define a Buffer Zone, as defined in the *Operational Guidelines*, "as the area surrounding the World Heritage property, marked in the national register as zone B is protected by very strict legal provisions implemented and supervised by the competent Conservation Department in Split".

It is still the firm view of ICOMOS that zone B should be designated formally as the Buffer Zone. Since the SP is confident that the area is fully protected this would impose no extra burdens, but would allow the SP to conform to the best practice followed in other World Heritage properties.

#### ***Hotel Ambassador***

ICOMOS notes that the permission to build a facsimile of the 1930s existing hotel has lapsed and that an application for a new building of the same dimensions as the existing may be considered in the future. Given the prominent nature of the site it is essential that the design of any such new building is of the highest quality and is sensitive to its highly visible location. This view is supported by the draft RSOUV which states that "inappropriate development in the area around the property may be an issue".

#### ***Eastern Part of the Port Project***

ICOMOS notes that there are currently no activities relating to this former infrastructure project.

#### ***City of Split Historic Core Management Plan***

The SP's report indicates that the situation with regard to the preparation of the Management Plan is still confused and unresolved. The process began in 2007; a draft was compiled in 2009; public consultation was begun; and a Commission was appointed in 2012 to draft the final plan. The Commission has not yet reported back however and there is no programme for completion.

In this unsatisfactory situation ICOMOS hopes that the State Party can agree a timetable for completion and submission to the WHC as soon as possible.

ICOMOS also repeats its recommendation that the final plan should contain:

- A clear revised statement on the Outstanding Universal Value of the property to replace and to amplify the Statement of Significance prepared in 1979. This review notes that the draft RSOUV has now been submitted by the State Party and commented on by ICOMOS which marks some positive progress towards the fulfilment of this recommendation.
- A section analysing the crucial viewpoints of the property which should be protected since new buildings within and outside Zone B may still impact on the setting of the property. This importance of this point has been noted in the draft RSOUV.

ICOMOS, Charenton-le-Pont  
April 2015