

World Heritage Centre
UNESCO
7, place de Fontenoy
75352 Paris 07 SP
France

Dear Madam/Sir,

We are writing to you because we believe there are reasons for the historic centres of Croatian cities of Dubrovnik, Trogir, and Split, as well as the Stari Grad Plain on the island of Hvar, all of which are inscribed on the World Heritage List, to be inscribed on the List of World Heritage in Danger. Principally, we think that Split and Stari Grad Plain on the island of Hvar are prime candidates for the List of World Heritage in Danger.

Reasons we are addressing you:

- I) Croatian Parliament adopted the Final Proposal of the Law on Illegally Constructed Buildings on 13 July 2012.
- II) Changes to boundaries of zone under highest national protection, Zone A, in the eastern part of the historic centre of Split, as well as harmonization of boundaries of the UNESCO protected heritage with national boundaries of protection which are established by the Croatian Ministry of Culture.

In addition, we would like to point out 2 facts which increased our concern and which affected our decision to send this appeal:

- a) Publication of the survey urban planning competition for the construction of traffic terminals, catering and housing objects within the UNESCO protected nucleus of the historic centre of Split, namely its eastern section. The competition defined its coverage zone, which included the area protected by UNESCO, and which in the meantime is no longer protected under Zone A of national protection.
- b) Historical Complex of Split with the Palace of Diocletian, which is protected by UNESCO, lost a distinct buffer zone, while recent amendments additionally reduced Zone B of national protection.

I.

Final Proposal of the Law on Illegally Constructed Buildings adopted by the Croatian Parliament on 13 July 2012.

Final Proposal of the Law on Illegally Constructed Buildings pertains to legalization of illegal construction, which represents a huge problem in Croatia. The reason we are sending you this appeal is that the new Law allows, for the first time, the legalization

of illegally constructed buildings in areas inscribed on the World Heritage List, inside archaeological sites, within boundaries of immovable cultural heritage or cultural-historical complexes inscribed in the Register of Cultural Goods of the Republic of Croatia, or a reconstructed part of an individual immovable cultural heritage inscribed in that same Register.

We therefore propose that historic centres of Trogir, Split, Dubrovnik and the Stari Grad Plain on the island of Hvar be inscribed on the List of World Heritage in Danger. We find that the situation is especially grave concerning the Stari Grad Plain on the island of Hvar and the Historical Complex of Split.

Namely, in the section of the Final Proposal of the Law on Illegally Constructed Buildings titled "II Explanation of the Final Proposal of the Law on Illegally Constructed Buildings", its Item 2 "Matters regulated by this law", under *Difference in dealing with named and other issues between the existing Law on Illegally Constructed Buildings and the proposed new Law, comprises of the following*, in Paragraph 5 it states:

- *Application of this Law is expanded to buildings constructed in all areas outside building regions in protected maritime demesne, in all categories of agricultural land, in managed and protected forests and forests with special purpose, and under certain conditions to buildings constructed inside archaeological sites or Zone 22, cultural-historical complexes inscribed on the World Heritage List and buildings which are registered as individual cultural goods and buildings in water resources,*

http://www.mgipu.hr/doc/Propisi/KPZ_nezakonito_izgrad_zgrade.pdf

According to Article 6, Paragraph 2, the authorized regional body of the Ministry of Culture, i.e. the regional conservation department, may approve legalization of illegal construction on cultural property, as well as on that inscribed on the World Heritage List.

Article 6

(2) Illegally constructed building cannot be legalized if it is located:

- *within an archaeological site or zone, within boundaries of immovable cultural property or cultural-historical complexes which are inscribed in the Register of Cultural Goods of the Republic of Croatia, or if it is a reconstructed part of an individual immovable cultural heritage inscribed in that same Register, except those buildings for which the public legal body authorized to deal with the protection of cultural heritage issued a permit that said building was constructed in accordance with special conditions established by that body on the basis of specific regulations during the procedure of issuing a location permit, i.e. decision on conditions for construction,*

It is our opinion that the procedural discussion in the Croatian Parliament was deficient, because the Education, Science and Culture Committee did not participate in the discussion about the proposed amendments to the existing law, even though "the protection and utilization of cultural resources" falls under its purview.

<http://www.sabor.hr/Default.aspx?sec=5272>

Objections put forth to the proposed Law on Illegally Constructed Buildings, the aim of which was to protect the valuable areas, were rejected based on arguments of grave concern. For example, the proposer of the law rejected an objection by the Environmental Protection Committee of the Croatian Parliament, which said as follows:

▪ *we find the fact that the proposer of the law does not sufficiently protect the protected maritime belt and other valuable resources under special regulations, unacceptable.*

The explanation as to why the objection was not accepted, among other things, states the following:

Namely, the said region loses its natural characteristics and actually becomes eligible for construction as soon as buildings are constructed on it, regardless of whom they belong and what their intended usage is. The same may be applied to the legalization of buildings in areas which under physical planning acts were deemed of exceptional value as agricultural land, as well as in managed and protected forests and forests with special purpose, which in actuality can no longer be described as such because they now have construction on its territory (page 39).

http://www.mgipu.hr/doc/Propisi/KPZ_nezakonito_izgrad_zgrade.pdf

It is our opinion that such attitude by the proposer of the law is alarming because, following this line of thinking, it points to the conclusion that it will be easy to conduct the legalization of devastation perpetrated through illegal construction on cultural property. It would suffice to accept the argument that said cultural property, because of the devastation it suffered, no longer possess its authentic value. Although the Ministry of Construction and Physical Planning and the minister himself, Mr. Ivan Vrdoljak, pointed out on several occasions that illegal buildings that cannot be legalized will be demolished, the above quote is based on the premise that there will be no demolition in valuable and protected areas. Furthermore, legalization of illegal buildings in said areas is justified by saying that those areas lost the reason for their protection as valuable agricultural land or protected forests due precisely to such illegal construction. The possibility of removing illegal construction is not being considered, therefore it follows that it is given priority and as such becomes the measure of value of a certain area.

Such expressed tolerance for illegal construction, moreover its precedence, poses a serious threat of degradation of the cultural-historical complexes of the Republic of Croatia (its three historical city complexes inscribed on the UNESCO list, as well as the Stari Grad Plain on the island of Hvar, which, as is well known, contain illegal buildings).

Conservation Departments of the Ministry of Culture are supposed to provide special conditions for legalization of illegal buildings on cultural property. However, such activity is in direct opposition with the Law on Protection and Preservation of Cultural Goods. Article 6, Item 3 of this Law defines preservation of cultural goods as “*systematic monitoring of the condition of cultural goods and ensuring its protection*”

from any danger posed to it or its monumental properties, as well as any other illegal or unauthorized usage". Legalization of illegal construction would degrade the exceptional value of those cultural goods, which is why they were inscribed in the Register and as such should be preserved for present and future generations.

In addition, it should be pointed out that there are no mechanisms that would enable consideration of possible legalization of illegal construction on cultural property, without improvisation and danger of corruption. Not a single area in Croatia that is protected by UNESCO has a Management Plan. The historical complex of Split, which is protected under the strictest zone of protection, Zone A, and is also protected with strict regulations in the new amendments to the General Urban Plan (GUP) of the City of Split, but there are still no key documents which would regulate construction, e.g. conservation basis, the writing of which is proscribed in the System of Protection Measures and should be built in the spatial plan-documentation. (Attachment No.1: Official Journal of the City of Split, 27 February 2012, no. 3, page 6)

In addition, the Criminal Code of the Republic of Croatia, in its Article 252.a prescribes a punishment from 6 months up to 5 years of imprisonment for illegal construction in cultural-historical complexes, on cultural property.

<http://www.zakon.hr/z/98/Kazneni-zakon>

The only way to enable legalization of illegal construction is for the competent bodies to pretend it does not exist, i.e. to act in accordance with Article 60 and 61 of the Law on Protection and Preservation of Cultural Goods:

Article 60

As per the special regulation it is necessary to obtain an obligatory location permit in order to conduct works on an immovable cultural property, as well as within boundaries of that cultural property, and the body authorized to issue such a permit is obliged to ensure all necessary conditions for the protection of the cultural property.

As per the special regulation it is necessary to obtain a decision on conditions for construction in order to conduct works from Paragraph 1 of this Article, and the investor is obliged, before filing a request for permit, to ensure special conditions for protection of the cultural property.

Article 61

As per the special regulation it is necessary to obtain an obligatory location permit in order to conduct works in protected cultural-historical complexes, and the body authorized to issue such a permit is obliged to ensure all necessary conditions for the protection of the cultural property.

As per the special regulation it is necessary to obtain a decision on conditions for construction in order to conduct works from Paragraph 1 of this Article, and the investor is obliged, before filing a request for permit, to ensure special conditions for protection of the cultural property.

Special conditions for the protection of cultural property from Article 60 and 61 is not an administrative act and is issued by the competent body at the request of the administrative body authorized to issue location permits i.e. at the request of the investor during the procedure of issuance of decision on conditions for construction.

<http://www.zakon.hr/z/340/Zakon-o-za%C5%A1titi-i-o%C4%8Duvanju-kulturnih-dobara>

In other words, competent authorities are supposed to pretend not to see any illegal construction, that the investor perpetrated no offence as per the Law on Preservation and Protection of Cultural Goods, and they ought not to report the offender for committing a crime as per the Criminal Code. Moreover, they are supposed to ignore provisions of two laws protecting the cultural heritage, pretend that persons engaging in illegal construction did not build anything, but that they are coming to them in a completely legal manner to request issuance of special conditions for the protection of cultural property, prior to submitting a request for the issuance of the appropriate decision on construction. This farcical procedure would enable legalization of something that the competent authorities would pretend exists only as a project. Their officers would then consider whether to approve the intervention as an “idea”, and not an already realized illegal act.

However, it is a matter of public knowledge that those same bodies of the Ministry of Culture in most cases failed to fine those engaging in illegal construction, even though Article 88 of the Law on Protection and Preservation of Cultural Goods empowers their inspector to pronounce a fine and collect it at the scene of offence. Article 90 prescribes that the monitored person is obliged to inform the inspector, within 8 days, that they fulfilled their obligation. If they do not act in accordance with the inspector’s decision, *the competent body will perform the prescribed actions at the expense of the monitored person.* However, there are no cases known to the public, at least not in the historical centre of Split, where competent bodies conducted such actions. Also, although the Ministry of Construction and Physical Planning annually receives and processes between 30 and 50 reports of illegal construction in the historical centre of Split, there is no known case of anyone being prosecuted as per the Criminal Code which foresees punishment of imprisonment for the offence of illegal construction in cultural-historical complexes.

Therefore, the question is whether those competent authorities that thus far mostly reacted in a mild manner to reports of illegal construction instead of applying the proscribed harsh repressive measures, would really be strict when they evaluate the possibility of legalization of that same illegal construction? By pretending that there is no illegal construction (in accordance with Articles 60 and 61), how are competent authorities going to react when investors request issuance of special conditions for the protection of cultural goods that could have been saved from devastation with a little more strictness?

Three Croatian historical city complexes of Dubrovnik, Split, Trogir, and the Stari Grad Plain on the island of Hvar are inscribed on the World Heritage List, which contain illegal construction. Because it is not possible to find in the Law on Protection and Preservation of Cultural Goods clear criteria, which would guarantee that

requests for legalization would be considered in a manner that would exclude arbitrariness and non-transparency, i.e. that consequences damaging to the heritage would be avoided, we are of the opinion that the above mentioned cultural-historical complexes should be inscribed on the List of World Heritage in Danger. We reiterate, however, that we think priority should be given to Split and the Stari Grad Plain.

We would like to emphasize that the Assistant Minister of Construction and Physical Planning, Ms. Ana Taritaš Mrak said in the Croatian Parliament on 21 June 2012 that the initiative to approve conditional legalization of illegal construction on cultural properties came from the Ministry of Culture. Said Ministry of Culture never provided a meaningful and comprehensive explanation as to why they are in favour of such a possibility of legalization, nor did they explain on which legal basis or criteria. It is important to note that great pressure can be anticipated from those who engaged in illegal construction. As we already pointed out, just in Split the building inspection receives and processes between 30 and 50 reports of illegal construction per year. Among such reports many relate to changes in elevation of historic houses and infrastructural interventions, which are probably the consequence of gentrification and more frequent transformation of housing objects into hostels.

<http://m.slobodnadalmacija.hr/Dalmacija/Najnovije/tabid/297/articleType/ArticleView/articleId/179091/Default.aspx>

Furthermore, buildings smaller than 400 m² can be legalized without an architectural or engineering certificate verifying that it meets the necessary criteria of fire protection, static load, hygiene, etc. This opens the possibility for legalization of illegal buildings, reconstruction and other interventions that endanger cultural heritage because they pose the risk of fire since they possess no attestation.

Illegal buildings constructed in zones of historic value are in contradiction with the Law on Spatial Planning and Construction, which proscribes as one of the important components of engineering and construction that in case of fire “it be contained from spreading to neighbouring buildings”.

This is especially important for historical city centres that do not meet contemporary standards of fire protection and have out-dated electrical installations, but which are very densely built. Therefore, areas which pose an extreme fire hazard. Legalization of interventions using unknown material which burdens the existing unstable system, are hazardous because the law does not foresee that in cases of such legalization conducted in cases of world heritage, fire protection standards ought to be improved within a reasonable time period. In that respect, the new law neglected to act preventively with regards to fire hazard reduction in protected areas.

It is evident that we can expect non-transparency with regards to decisions on legalization in those areas, from the manner in which the Final Proposal of the Law on Illegally Constructed Buildings regulates informing parties in the procedure. Namely, Article 17, Paragraph 3 states:

Summons to view the case file is provided to the parties by public notification on the bulletin board of the administrative body competent in the region where the building for which the decision on the situation report was requested, is located.

Therefore, the Law annuls the possibility to inform bordering neighbours and the unit of local self government, who (along with the requestor) are all recognized as parties in the procedure, by mailing the summons to their home addresses. And Paragraph 5 of the same Article states that the party, which does not respond to summons to view the file, cannot on that basis request the repeat procedure.

Furthermore, the new Law on Illegally Constructed Buildings foresees that the decision on the situation report (document which legalizes illegal construction), in its abbreviated form rather than the complete file, be delivered to all parties in the procedure. The parties may then, with insufficient documents, lodge an appeal to the competent Ministry or an administrative court. However, the Law does not foresee evidence procurement (e.g. photos of the bulletin board, etc.) to prove that parties in the procedure were provided with the summons to view the case file and react to it, i.e. that the summons was ever announced on the bulletin board. Provisions of the law do not prevent fraudulent behaviour, i.e. that the decision on conditions of construction is issued to the requestor without ever announcing the summons to view the file on the bulletin board.

In short, who will supervise decisions of the Conservation Departments of the Ministry of Culture and other participants in the process of issuance of decisions on situation reports on cultural property? Moreover, it is clear that the Law did not enable democratic mechanisms of control by independent experts and the interested public, in the process of issuing extremely sensitive decisions affecting aesthetic appearance and security, with regards to legalization in the area of cultural heritage by the competent bodies.

II.

Changes to boundaries of zone under highest national protection, Zone A, in the eastern part of the historic centre of Split, as well as harmonization of boundaries of the UNESCO protected heritage with national boundaries of protection which are established by the Croatian Ministry of Culture.

As a special example of non-transparency of the Conservation Department of Split, which is the authorized body responsible for issuance of special conditions for legalization of illegal construction, we can specify that in 2010 they conducted the reduction of boundaries of the southeastern part of the area inscribed in the UNESCO protected register in 2008. This was conducted in such a manner that part of the zone under highest protection, that of Zone A, was reduced i.e. abolished and given lower zone of protection, that of Zone B. Despite complaints from civic associations, the competent authorities never explained why that was done.

The response given by the Ministry of Culture spokesperson, Ms. Ivana Krušec, is that the Ministry was asked for their opinion regarding the changes to boundaries of protection, that of Zone A, of the Split historical centre, and that they will send a comprehensive response to UNESCO and are prepared to provide further explanations if necessary. Many things remained unclear with regards to boundaries

of protection of Zone A to those who had the opportunity to listen to the explanation of Mr. Radoslav Bužančić, head of the Conservation Department of Split, when he presented amendments to the General Urban Plan (GUP). We should also stress that Mr. Bužančić initially denied that the area of Zone A was changed at all.

Dr. Ante Tukić from the Association of Friends of Cultural Heritage protested that there are differences in Zone A drawn in the existing GUP map and the new GUP map to be adopted, while Mr. Bužančić insisted that the conservation department did not change anything, but added that the old GUP map was probably the wrong one. This provoked the present urban planners who said that they drew the map of the existing GUP according to the one from 2003 provided by the conservation department. Mr. Bužančić then admitted that he does not know what happened and how the changes came to be, perhaps because now the boundaries of protected zones are determined according to cadastral plots, and it was previously possible to draw them more freely?!

In any case, while the previous boundaries of Zone A were identical to the area under UNESCO protection, the new Zone A is not. It was reduced in the area east of the Port Authorities of Split, and extended towards the Croatian National Theatre. However, according to Mr. Bužančić this should not be a matter of concern for UNESCO because the area protected as Zone A falls under the national authority, and changes to its boundaries do not question boundaries under the protection of UNESCO.

<http://www.h-alter.org/vijesti/kultura/unesco-zabrinut-za-split>

The fact that boundaries of the area of Zone A have changed in comparison to that of UNESCO, but also in comparison with the Zone A as it was previously drawn, is evident from the attached photographic material. (Attachment No 2: Map of boundaries of the protected Split historical zone). It is especially noticeable in the southeastern section. There, Zone A was changed so that it was reduced in comparison with both the UNESCO protection and previous Zone A of protection. The reason is unclear and cannot be found in the official explanation given by the competent authorities. Reason can likewise not be found in the statement by Mr. Radoslav Bužančić, head of the Conservation Department of Split who said that the boundaries are now drawn in accordance with cadastral plots. Namely, since boundaries of the area under protection, the new Zone A, were included in the amendments to the General Urban Plan of the City of Split, the Official Journal dated 27 February 2012 contains the following controversial data:

It turns westwards along the southern edge of cadastral plot no. 12782/1 (Old Marketplace) and joins the southeastern corner of Hrvojeva Street, from where it turns southwards along the eastern edge of the Riva (Obala hrvatskog narodnog preporoda) and intersects the cadastral plot no. 13828/1, and further comprises plots no. 9537/1, 13827/1, and 13827/3 (Obala Lazareta), whose eastern edge it follows to the sea.

In other words, the reduction of boundaries of the comprised area in that location does not follow cadastral plots, in the sense that it adapts to them, but it intersects

plot no. 13828/1. This means that the border in that location is drawn independently from the area and shape of cadastral plots.

(Attachment No 3: Drawing of cadastral plots from Arkod Programme, which was initiated by the Ministry of Regional Development, Forestry and Water Management, on the basis of which it can be concluded that cadastral plots do not coincide with the new reduced boundaries of the protected Zone A, in the area bordering southeastern tower of the Diocletian's Palace and the Tourist Palace).

Also, the claim that *"Zone A (complete protection of historical structures) incorporates all parts of the city within the Baroque walls built in the 17th century"* (Official Journal, 27 February 2012, no. 3, page 5) is no justification for the reduction of the protected Zone A in the area along the southeastern tower of the Diocletian's Palace towards the Tourist Palace. Evidence of this is found when we compare the earliest drawings of the Baroque walls – whose layout can clearly be seen in the drawing of the Plan of Split by Giuseppe Santini, dating from 1666 – with the drawing of the newly established Zone A. By comparing those two drawings we can see that the Baroque fortifications, at the southeastern section, were located significantly further away from the southeastern tower of the Diocletian's palace, than it is the case with the present protected Zone A. Furthermore, based on Santini's Plan of Split from 1666 we can conclude that with the reduction in Zone A in that area, the drawing of Zone A is in obvious contradiction with the text of the amended GUP which states that Zone A "incorporates all parts of the city within the Baroque walls built in the 17th century".

(Attachment No 4: Comparison of the Santini drawing and the drawing of Zone A provided by the Conservation Department of Split in 2010)

After we explained reasons under I. and II., which we consider to be key reasons for inscription on the List of World Heritage in Danger, we would like to point out reasons which cause further concern.

- a) We think that the reason for the stated reduction of Zone A and introduction of Zone B, i.e. reduction in degree of protection for the area which falls under UNESCO protection, is the publication of the survey competition which is mentioned in the GUP as City Project 2 East Coast.
- b) The protected Zone B was significantly reduced in Split, and with regards to everything thus far stated it is important to note that the buffer zone does not exist, nor is it known when it might be defined.

a) Competition for the East Coast

Town of Split conducted a survey urban planning competition for the East Coast of its city port, which is among the busiest passenger ports in this part of the Mediterranean. Railway, ferry, and bus terminals, which annually transport approximately 3.5 million passengers, are located at the eastern part of the city port, in the immediate vicinity of the zone protected by UNESCO. With this survey competition the City Authorities intended to investigate possibilities of utilizing those facilities in a potentially more successful manner, which would involve significant possibility of new construction. Mr. Radoslav Bužančić, head of the Conservation Department of Split publically promised to inform UNESCO about this competition.

We are not aware whether he did that or not. In accordance with Article 172 of the Operational Guidelines for the Implementation of the World Heritage Convention, we are hereby informing you that this urban planning competition has been concluded, although there was no public announcement about the winning design.

It is interesting to note that nowhere in the competition programme is it emphasized that part of the competition coverage area is under UNESCO protection. This was not done in any part of the programme:

“6.4 CONSERVATION GUIDELINES FOR RECONSTRUCTION OF EAST PART OF THE SPLIT CITY PORT Extract of the study *Conservation background of the East Coast of the Port of Split* – Section for the protection of cultural heritage, Conservation Department in Split, May 2011”.

Moreover, item 6 of the programme, MEASURES FOR PRESERVATION AND PROTECTION OF SCENIC AND NATURAL VALUES AND OF CULTURAL-HISTORICAL COMPLEXES AND BUILDINGS, states the following:

From the aspect of protection the coverage area in the City Project 2, which is part of the cultural-historical complex of the City of Split, has the property of cultural heritage and as such belongs to Zone ‘B’ – ‘partial protection of historical structures’. Zone ‘B’ covers the area of the City of Split, which developed in the historic period from the end of the 17th c. until mid 20th c.

However, it is clear from the competition drawing that its coverage area overlaps with the zone under UNESCO protection. Also, it is clear from the Santini drawing of the Baroque walls that Zone B in this case covers also part of the city, which dates from an earlier period than that *which developed in the historic period from the end of the 17th c. until mid 20th c.* (Attachment No 5: Comparison of the coverage area from the competition programme, UNESCO protected zone, and the Baroque walls).

If we take into consideration that the survey competition facilitates a very ambitiously presented new construction in the maximum amount of 130,000 m² of functional space, it is clear that such ambition invites caution, especially if the competition participants are not warned of the need to respect the heritage inscribed on the World Heritage List which is in direct contact with the coverage area, and which is not emphasized in the “Conservation guidelines”.

b) Reduction of protected Zone B.

Considering all thus far stated, it seems that the reason Split does not have a defined buffer zone is no accident. Because urban planning competitions which foresee significant interventions in the Port of Split were conducted for its West Coast and now East Coast as well, and these are areas in direct contact with Zone A.

Furthermore, we are not aware of whether the City of Split informed UNESCO about the implementation of the competition for the West Coast of the city port, which is currently in the process of realization, and of which obligation the City of Split was informed by the former head of the Conservation Department of Split.

Namely, having in mind the location which is in direct contact with the historic centre and is in the vicinity of the Palace of Diocletian, the City will be obliged to request, in

addition to the approval of the conservation department, the permission from UNESCO on the winning design which will be the basis for construction. Therefore, as in the case of the reconstruction of Riva, UNESCO will decide whether the new appearance of the West Coast in relation to the cultural heritage is acceptable.

- The City should send us official results of the competition, and we will provide an opinion as to whether it is in accordance with the conservation report which was the basis for the competition programme. Following our approval, the City is obliged to inform UNESCO about the planned intervention, said Ms. Tajma Rismondo-Čalo, former head of the Conservation Department of Split.

The City's Spokesperson Ms. Ivana Viđak-Bjedov said that the City would respect the legal procedure.

<http://www.slobodnadalmacija.hr/Split/tabid/72/articleType/ArticleView/articleId/106189/Default.aspx>

Reduction of Zone B occurred in 2 stages. First, at the end of 2010 Ministry of Culture accepted the proposal of the Conservation Department of the City of Split, which in practice abolished Zone B from an important section of valuable parts of Split, and which it previously covered, e.g. Marjan Park Forest, and town districts of Bačvice, Meje, etc. This provoked a series of public protests organized by associations dealing with heritage as well as professional public. New amendments of GUP from the beginning of 2012 introduced local level of lowest protection, so-called Category C, for the Marjan Park Forest, although the Ministry of Culture announced its plan to inscribe the Marjan Park Forest in the Register of National Cultural Goods. Moreover, Bačvice city district also found itself in Zone C. GUP amendments from the beginning of 2012 restored Zone B of protection, but in significantly reduced coverage area, mostly for the territory constructed before World War II, e.g. Varoš, Dobri, Lučac, Manuš, Tioč, East and West Coast of the City Port, and portions of Gripe. Inevitably, instead of working towards defining the buffer zone for Split which would be inscribed on the UNESCO list, the reduction of Zone B and introduction of the “consoling” Zone C, as zone of lowest protection responsibility for the Marjan Park Forest, this only succeeded in creating distrust among the public. (Attachments No 6 & No 7: Drawing from 2008 GUP, amendments to GUP of the City of Split from 2012, which demonstrate the scope of reduction of Zone B and introduction, in its place, of the lowest level of protection Zone C).

Because of all these reasons, we would like to reiterate an appeal that the historic centres of Trogir, Split, and Dubrovnik, as well as Stari Grad Plain on the island of Hvar – and primarily the centre of Split and Stari Grad Plain – are inscribed on the List of World Heritage in Danger. We think that inscription on this List would act as a warning to the national Ministry of Culture. It would represent a preventive measure and would assist in significant reduction of decisions by officers of the Ministry, which could cause irreversible damage to the heritage recognized to be of outstanding universal value.

Best regards,

Inicijativa Za Marjan (For Marjan Initiative)