

World Heritage Watch Report 2025



World Heritage Watch

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Upper left: An aerial view of Saltaire, an English industrial town known for its distinctive rows of houses made of Yorkshire stone. *Photo: Geoff Griffiths / Getty Images*

Upper right: The archaeological site of Jebel Barkal, Sudan, heavily damaged after torrential rainfall in the summer of 2024. *Photo: National Corporation for Antiquities and Museums of Sudan*

Lower left: One of the few remaining vaquitas in the Gulf of California. *Photo: Marcelo Otero / Greenpeace*

Lower right: Sharif Jamil, Coordinator of Waterkeepers Bangladesh, speaking on a public gathering to demand the closure of the Rampal Power Plant, 27 December 2024. *Photo: Hasib Sarder*

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Appeal to Halt the Irreversible Destruction of the Kotor Region's Outstanding Universal Value

EXPEDITIO - Centre for Sustainable Spatial Development
The Friends of Boka Kotorska Heritage Society



Ten years after the first article about the Natural and Culturo-Historical Region of Kotor¹ (hereinafter referred to as Kotor Region) and repeated warnings about serious problems in 2018² and 2020³, we are compelled once again to speak out and send an appeal to stop the irreversible destruction of the Outstanding Universal Value (OUV) of this World Heritage Site.

As far back as since 2003 the World Heritage Committee Decisions have been continuously and clearly focusing on the problematic situation in the Kotor Region, primarily in relation to *excessive urbanization*, but also to the *inefficient protection and management system*.

At the beginning of 2025, excessive urbanization – particularly intensified over the past few years – continues, destroying the OUV of the area. The most problematic aspect is that it is being carried out under the existing spatial plan of the Municipality of Kotor. The current management system is entirely dysfunctional, with no revised Management Plan for over five years, and a Management Council that did not meet even once between 2021 and mid-2024. Excessive urbanization is solely linked to the development of tourism infrastructure, and the pressure from overtourism, particularly cruise tourism, now represents an enormous problem for the region's infrastructure and the quality of life for its residents.

In recent years, the **deterioration of the region has accelerated**. Unfortunately, this decline is not evident in the State of Conservation Reports by the State Party, which fail to address the key problems and instead create the impression that everything is under control. For example, the 2024 report contains false information, stating that the draft Management Plan is in the "final stage of preparation and will soon be sent to the Government for adoption," and that for the buffer zone study, "ongoing negotiations are taking place to finalize the conceptualization of this document." **Particularly concerning is the official stance of the state in the 2024 report regarding the "Heritage Impact Assessment for Natural and Culturo-Historical Region of Kotor for Harmonizing Policy/Planning Framework and Instruments"**. In the decisions of the World Heritage Committee, the updating of this HIA has been repeatedly requested for years. In its 2020 report, the State Party stated that the update was in progress; however, in the 2022

report, it was not mentioned at all, and in the 2024 report, it was stated that **"the relevance of this document has become redundant."**

This is a highly concerning position, especially because there is a visible problem with the huge number of individual HIAs that are being produced. The Committee has emphasized the need to consider the cumulative impact, rather than relying on fragmented individual assessments. Furthermore, the preparation of this assessment is explicitly recognized as a legal obligation under the Law on the Protection of the Natural and Culturo-Historical Region of Kotor, which states that: "Planning documents must be aligned with the Heritage Impact Assessment (HIA) for the entire Kotor Region, as well as for its individual parts."

Planning and the Spatial-Urban Plan of the Municipality of Kotor

The current state of the area reflects excessive urbanization, which is implemented on the basis of **Spatial Urban Plan of the Municipality of Kotor** (hereinafter referred as the SUP) **adopted in 2020**. The implementation of this plan continues to destroy the cultural landscape and OUV, which is **"embodied in the quality of the architecture in its fortified and open cities, settlements, palaces and monastic ensembles, and their harmonious integration to the cultivated terraced landscape on the slopes of high rocky hills."**

One of the most obvious examples is Dobrota, where the **"cultivated terraced landscape"** has been completely destroyed. All new constructions involve unnecessarily **large interventions in the natural terrain, completely altering its configuration**. As a result, the **terraced fields, one of the attributes of the OUV, are disappearing**. Additionally, the **density of buildings allowed by the SUP completely erases the inherited structure of settlements**, while the new buildings, due to their size and volume, dominate the space, overshadowing traditional structures, including the largest baroque palaces. **SUP does not consider the specific characteristics of individual historic settlements** within the Kotor Region, applying uniform parameters across all areas. The function of the buildings constructed in recent years is particularly problematic. Despite be-

ing designated for “residential use” in the plan, they are almost exclusively **built for tourism**, specifically as rental apartments.

Perhaps the most critical issue is that **the SUP does not comply with the Cultural Heritage Protection Study**. Because of this, institutions are requesting individual HIAs for non-compliant zones. This only leads to an overproduction of individual HIAs, failing to address the cumulative impact on the OUV, which was also pointed out by the WHC.

In addition to all, there are also **problematic interventions** that are **not in accordance with the SUP**, like **newly built road from Donji to Gornji Stoliv**, in the zone of special importance for OUV, where roads were not planned.

The Management Council and revision of the Management Plan

The Council for the Management of the Natural and Culturo-Historical Region of Kotor, which is formed by the Government for the purpose of coordination of the activities of protection, preservation and management of Kotor Region, **is not functional**. As early as 2017, Council members clearly stated that the role of the Council did not entail management function (which had been recognized in the Management Plan itself) and that it is “necessary to review the legal and institutional framework which would improve the mechanisms and the bodies that were to manage the region.”⁴ However, the situation has worsened since then. The **Law on the Protection of Natural and Culturo-Historical Region of Kotor defines that the Council sessions are held at least once a month**. During 2020, the Council met only twice, and **from 2021 to mid-2024 there were no meetings at all**.⁵ The Government of Montenegro appointed new members of the Council on 20 June 2024, and that **Council held only two meetings until 1 February 2025**, on 13 August 2024 and 24 January.⁶ It is clear from the above that the Council is not functional at all, which represents a big problem for the management of the Kotor Region. In addition to that, one of the key problems, pointed out already by the WH Committee, is that **the Revision of the Management Plan**, the key instrument for management, which **started in March 2019, has not yet been completed**.

Overtourism and the decline in the residents’ quality of life

In recent years, **overtourism**, especially mass cruise tourism, has put extreme pressure on the Kotor Region⁷. While in 2003, Kotor had 100 cruise ships, with around 34,000 passengers, in 2025, 485 ships with 700,000 passengers are expected.⁸ At the same time, **statistical data indicate that the population of Kotor is declining, while the number of housing units is rapidly increasing**. While the entire municipality of Kotor

had 22,601 residents in 2011, according to the 2023 census, the number has decreased to 21,916. In the Old Town of Kotor, the population dropped from 961 residents in 2011 to 562 in 2023. However, the number of housing units in the entire municipality increased—from 13,516 in 2011 to approximately 17,092 in 2023, a rise of about 3,500 units. All of this highlights the **impact of tourism on excessive urbanization** and the enormous pressure from cruise tourism on the entire Kotor Region, especially on the town of **Kotor, which, with only 562 residents in 2025, is expected to receive at least 700,000 cruise ship tourists**. In addition to that, the issue of **traffic congestion** has become increasingly pronounced, not only within the protected area but throughout the entire bay. The problem largely stems from the fact that automobile traffic is dominant, the number of cars continues to rise, and the area is becoming more densely built-up.

Kotor Municipality has **no official Tourism Development Strategy**. In July 2024, the **Global Sustainable Tourism Council** prepared “**GSTC Destination Assessment**” for Kotor⁹. The State of Conservation report by the State Party for 2025 states that “*this Study should answer the questions of how successfully Kotor can respond to the problem of the pressure of a large number of tourists*”. However, **this assessment focuses exclusively on the town of Kotor, without taking into account the entire Kotor Region, inscribed on the World Heritage List**, and therefore, it cannot be considered sufficient. Additionally, it would be highly beneficial to conduct a Strategic Environmental Assessment (SEA) for the Kotor Region, as stated in the decisions of the Committee. We must emphasize that the SEA for the Spatial Plan of Montenegro until 2040¹⁰, which is mentioned in the State of Conservation report by the State Party for 2025, is not the document of the same level and does not adequately address the impact of tourism on the Kotor Region.

Conclusions and Recommendations

Considering all the above and referring to Decision 46 COM 7B.11 of the World Heritage Committee, we believe that:

- It is essential that Montenegro complies with the Committee’s decisions and **invite an Advisory Mission** to avoid any risk of cumulative impacts on the property’s OUV. Along with the Advisory Mission, we believe that, **due to the overall condition of the Kotor Region, a Reactive Monitoring Mission should also be organized**.
- The current **Spatial Urban Plan (SUP) of the Municipality of Kotor must be urgently repealed**. Following this, it is necessary to initiate the development of a new plan aligned with the Cultural Heritage Protection Study, which will halt further devastation of the area.
- It is necessary to **immediately initiate the preparation of a HIA for the entire Kotor Region**, as required by law, with its process running parallel to the development of a new

SUP. This would **help put an end to the overproduction of individual HIAs**, which fail to assess the cumulative impact on OUV of the Kotor Region.

- In accordance with the Committee's decisions, a **Strategic Environmental Assessment** must be conducted to proactively manage tourism development throughout the property.
- A **new model for the effective management of the Kotor Region must be developed**, including a new model for the Management Council. **In the meantime, the existing Council must be reactivated and operate in accordance with the law.**
- The **revised Management Plan must be urgently completed, with the involvement of experienced experts** who would lead the process in line with internationally recognized best practices. The assistance of the Advisory Mission throughout this process from its beginning would be of great importance.
- The process of developing a **Cultural Heritage Protection Study for the buffer zone** must finally begin, along with its implementation into spatial planning documentation.
- An **integrated transport plan** should be developed for Kotor Region and its buffer zone, incorporating also alternative modes of transport, particularly maritime transport.
- A **tourism development strategy** must be created, along with a **new tourism impact assessment**, for the entire Kotor Region and its buffer zone.

Considering all of the above, we urge local and national authorities to take responsibility and stop the irreversible destruction of the Outstanding Universal Value of the Natural and Cultural-Historical Region of Kotor.

Annex: Photographic Documentation

All photos by EXPEDITIO

The illustrations show the condition of the Natural and Cultural-Historical Region of Kotor in January 2025, mostly through the most problematic example of the settlement of Dobrota.



Fig. 1: Above the historic settlement of Dobrota, the characteristic cultivated terraced landscape is almost completely destroyed. The traditional ensembles, baroque palaces, and churches have been entirely buried by contemporary urbanization. Therefore, the characteristic vertical landscape profile and visual landmarks, recognized as attributes of outstanding universal value of Kotor Region, have been completely lost.

Fig. 2: An example of the complete destruction of traditional terraced landscape in Dobrota is evident in the preparatory works for the construction of a new residential complex in the upper zone of Dobrota, where originally traditional buildings (an old stone house and a threshing floor) and terraced fields were preserved. This zone was not designated for construction in the Cultural Heritage Protection Study, but it was in the Spatial Urban Plan (SUP), and therefore an individual Heritage Impact Assessment (HIA) was required.





Fig. 3: High density of construction in historic settlement of Dobrota.



Fig. 5: Zone above Ivanović palace: remains of the cultivated terraced landscape at the left, and the area where new construction is beginning in the already overbuilt area at the right.



Fig. 7: Another example from Dobrota, below the Church of St. John, where a building under construction with a ground floor and four floors completely surpasses all existing structures. The building at the right, was built in the past two years on cultivated terraced landscape with very ancient oak trees, which have been removed. This building represents an example of structure permitted under the SUP.



Fig. 4: Part of Dobrota south of the Church of St. Eustace, including the Ivanović and Dabinović Palaces, with marked historic structures and overdevelopment in the zone of terraced landscape. The area around the Dabinović Palace has already been completely overbuilt with excessive density, with buildings of inappropriate size and volume. In the area above the Ivanović Palace, in the recent years large-scale structures have been built, and preparations are underway for the construction of a new residential complex to the right of the palace.



Fig. 6: The historic settlement of Dobrota, south of the Church of St. Matthew, with Milošević palace (early 19th c.) the largest Dobrota palace, along with ensembles of traditional buildings. Yellow - buildings of traditional architecture, including the Milošević palace. Red - oversized structures built in recent years, including the complex currently under construction on the right. In the upper zone, residential houses were built throughout the 20th century, but their density and volume did not significantly threaten the traditional terraced structure. However, the structures built in recent years, as well as those currently under construction, have completely degraded the inherited structure of the historic settlement and the overall landscape due to their high density, volume, and placement.



Fig. 8: Example of structures currently under construction in Ljuta under the provisions of the Spatial Urban Plan for Kotor Municipality (SUP). Although the basement should be an underground part of the structure, this is often not the case. As a result, buildings presented in the plan as having just first floor and attic usually comprise four full levels, with large volumes that deviate from traditional structures, and disrupting the historic urban fabric. The largest traditional buildings, palaces, typically feature a ground floor, two floors, and an attic with a belvedere. But those new structures vastly exceed the traditional structures, including even the palaces.

Notes

- 1 <https://world-heritage-watch.org/content/wp-content/uploads/2021/06/2015-WHW-Bonn-Conference-Proceedings.pdf>
- 2 <http://world-heritage-watch.de/wp-content/uploads/2018/06/2018-Report-WHW.pdf>
- 3 <https://world-heritage-watch.org/wp-content/uploads/2020/06/WHW-Report-2020.pdf>
- 4 Report on the Implementation of the Management Plan for the year 2017, prepared by the Council <http://www.kotor.me/me/savjet-za-upravljanje-podru%C4%8Djem-kotora/>
- 5 Secretariat for the Protection of Natural and Cultural Heritage of the Municipality of Kotor, document from 23 January 2025, issued on the basis of the request on free access to information of the NGO MANS.
- 6 <https://radiokotor.info/clanak/drustvo/-sastao-se-savjet-za-upravljanje-podru%C4%8Cjem-kotora-prva-sjednica-u-novom-sazivu/0> i <https://www.kotor.me/opstinakotor/vijesti/druga-sjednica-savjeta-za-upravljanje-podru%C4%8Cjem-kotora/>
- 7 <https://www.reuters.com/world/europe/montenegros-adriatic-gem-struggles-with-tourist-influx-2024-08-09/>
- 8 <https://www.portofkotor.com/en/cruise-ships/statistics/>, [https://radiokotor.info/clanak/drustvo/danilovi%C4%86:-u-toku-2025.-oko-485-brodova-i-700.000-putnika-\(audio\)/0](https://radiokotor.info/clanak/drustvo/danilovi%C4%86:-u-toku-2025.-oko-485-brodova-i-700.000-putnika-(audio)/0)
- 9 <https://www.gstcouncil.org/wp-content/uploads/GSTC-Assessment-Kotor-2023.pdf>
- 10 Document “SPU Nacrt PPCG” at the web page <https://www.gov.me/clanak/prostorni-plan-crne-gore>



Fig. 9a and b: The historic settlement of Ljuta in 2020 and with new constructions in January 2025. The historic settlement of Ljuta was one of the most well-preserved historic settlements along the coast. However, the buildings newly constructed under the SUP vastly exceed in volume the traditional structures, including even the largest palaces. The most significant complex in Ljuta, the Church of St. Peter, has been visually degraded by new construction behind it.



Fig. 10: In the north part of Ljuta, at the first row along the coast, a newly constructed building, interpolated into a row of traditional structures, exceeds the highest traditional building - a small palace - by an entire floor. The approval document for the project states that the building has a three floors P+1+Pk (three visible levels: ground floor, first floor, and attic). However, it is evident that the floor count was not calculated from the coastal road elevation, which should have been a requirement, and the attic was constructed as a full-height floor.



Fig. 11a, b and 12a, b: Kavalin area in Dobrota, and detail of traditional house (2018) and after restoration (2025). Parallel to the new constructions, there are also cases of **inappropriate restoration works** on traditional buildings. In this traditional house, original stone window frames - previously in good condition - were removed and replaced with profile dimensions and stone type that are not in accordance with the traditional ones. The authentic roof cornice was replaced by a new oversized and profiled cornice that is not at all characteristic of the traditional architecture of Bay of Kotor.



Fig. 13: Overtourism: Four cruise ships anchored simultaneously in the Bay, November 2024