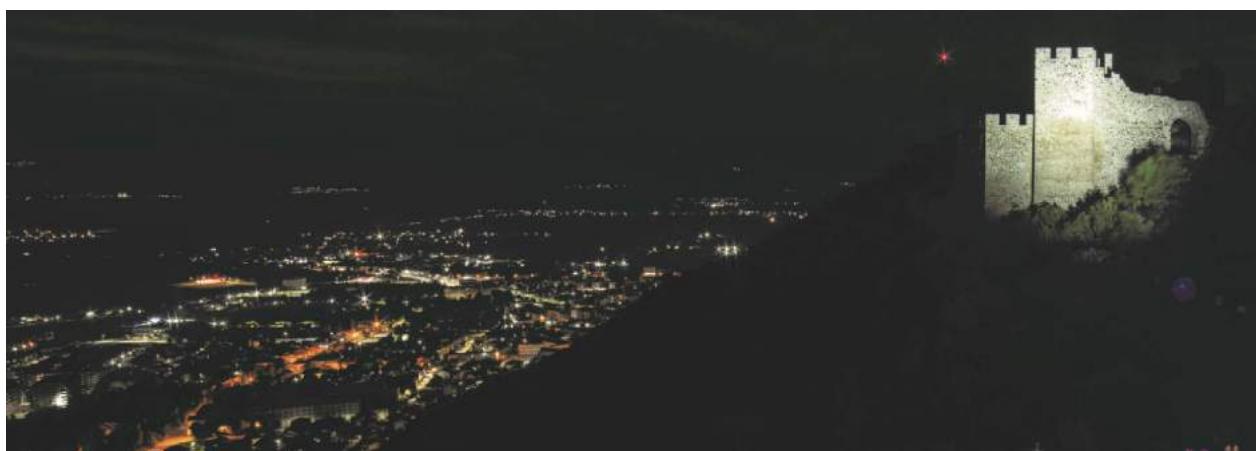




CULTURAL HERITAGE MANAGEMENT PLAN

TSAR'S TOWERS, STRUMICA



SUB-PROJECT
"ECONOMIC VALORIZATION OF CULTURAL AND
ALTERNATIVE TOURIST OFFER OF THE TSAR'S TOWERS IN
TOURIST DESTINATION STRUMICA"

Strumica, December, 2019

ABBREVIATIONS AND ACRONYMS

LRCP	Local and Regional Competitiveness Project
ESMP	Environmental and Social Management Plan
CHSMP	Cultural Heritage Site Management Plan
PIU	Project Implementation Unit
CASTT	Cultural Archaeological Site Tsar's Towers
NIIPCMMS	National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica
CHPO	Cultural Heritage Protection Office
CH	Cultural heritage
CHS	Cultural Heritage Site

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Cultural Heritage Site Management Plan of CHS “Tsar’s Towers”, ver.1, 2019

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FOREWORD

The Cultural Heritage Site Management Plan (CHSMP) of the Tsar's Towers has been prepared by a team of experts for the needs of the Municipality of Strumica and the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica in line with the requirements and full compliance with the existing legislation in the field of cultural heritage protection of the Republic of North Macedonia.

The archaeological site of "Tsar's Towers" (Carevi Kuli) is a cultural monument which has been declared cultural heritage of particular importance by Institute for Protection of Monuments of Culture, Natural Rarities and Museum – Strumica. The present CHSMP represents a statement of commitment of various stakeholders that sets out a robust framework for the development, protection, conservation and subsequent management of the Cultural Heritage Site (CHS) of Tsar's Towers. The CHSMP is a „live“ document that will serve as a blueprint for the development of the Tsar's Towers Site and will be reviewed in the future to serve its purpose better and ensure the efficient and sustainable management and protection of the CHS.

At its current revision, the CHSMP has been prepared for the foreseen activities within the framework of the sub-project "Economic valorisation of cultural and alternative tourist offer of the Tsar's Towers in tourist destination Strumica", implemented under the Local and Regional Competitiveness Project (LRCP). As such, it represents an integral part of the Environmental and Social Management Plan (ESMP) of the sub-project. The ESMP and the CHSMP identify sustainable and effective measures that can help avoid or reduce potential adverse impacts to an acceptable level on the living and social environment and on cultural heritage. Both documents consist of a collection of institutional and other mitigation and monitoring measures during the implementation of the activities, planned in order to eliminate the adverse and negative environmental and social impacts or to reduce them to an acceptable level.

The aim of the Cultural Heritage Site Management Plan (CHSMP) is protection, elimination and reducing the adverse effects on the cultural heritage in accordance with the Law on cultural heritage protection of the Republic of North Macedonia. In this aspect, CHSMP has an important role in indicating and defining the way in which physical and cultural heritage will be managed, in order to provide sustainable conditions for preservation during the development of the project, especially during the design phase, in the construction phase and in the operational phase. CHSMP also provides a description on how the Site will be managed financed and operated after the planned construction and preservation stages are completed.

The CHSMP includes a description of the project, technical details, scope and location, on the basis of which the environmental and social risks are assessed. CHSMP provides a description of the potential risks and mitigation measures, including the type of impact, description of equipment and procedures for action, assessments of the cultural heritage of these measures, etc.

The implementation and monitoring of the CHSMP will be a joint responsibility not only of the main parties involved in the process, i.e. Municipality of Strumica and the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica but also of a diverse number of stakeholders and their willingness to work in partnership in the process of developing, managing and preserving the CHS.

1. General information

1.1 Information on the Cultural Heritage Site

The cultural - archaeological site Tsar’s Towers in Strumica (CHS) - is located on the top of the hill above the city in the immediate vicinity of the city of Strumica, the main centre of the municipality, which in our country is categorized as the highest category of tourist site in accordance with the attractiveness criteria for tourist visits. Being situated in the vicinity of Strumica, the Site is easily accessible from the main entry points of the country, i.e. 140 km. from the city of Skopje (by bus or train), 30 km. from Bulgaria (by bus or a car), 50 km. from Greece (by bus or a car), etc. CHS fulfils all conditions according to the definition for “tourist site”: it is attractive (cultural and historical monuments); it is accessible (pedestrian and traffic accessibility), it has high receptivity (as the municipality has facilities and capacities that may accommodate tourists, offering the necessary services).

The CHS with its cultural, historical and spiritual heritage, which dates back from ancient times until the Middle Ages, represents a high potential for the development of the municipality and the city of Strumica and is one of the most recognisable landmarks of Strumica. Based on the typological characteristics, the cultural and archaeological site of Tsar’s Towers is categorised as a complex archaeological site of prehistoric, ancient and medieval type. There are various prominent and sacred monumental objects (facilities and items) within the framework of the CHS and it is one of the largest archaeological sites on the Balkans. Due to the large importance and value, CHS is protected as a **cultural monument** whose property is specified by Decision No. 925 from 16.09.1998 listed in the National registry of cultural heritage. It is listed as a cultural monument under No. 03-94/1 from 06.06.1981 at the Institute for protection of monuments of culture, natural rarities and museum - Strumica, in addition with Decision No. 09-53/1 from 01.09.1998. Due to the criteria in terms of documentation that fulfils, as well as diversity and integrity, CHS categorised as cultural heritage of particular importance. The Law on cultural heritage protection prevents activities and impacts that may damage and degrade cultural heritage sites, such as CHS and provide preservation of its historical and cultural values.

The current situation of the CHS is also confirmed in the program for revitalization of the “Tsar’s Towers”, but due to lack of funds for various types of interventions (like construction of protective fences, improvement of pedestrian networks and other open surfaces that are in exceptional degraded condition), the current state is still unsatisfactory.

1.2 About the project

The present Cultural Heritage Site Management Plan has been developed in the framework of sub-project “Economic valorization of cultural and alternative tourist offer of the Tsar’s towers in Tourist destination Strumica”, implemented under the Local and Regional Competitiveness Project (LRCP).

LRCP is a four-year investment operation, supported by the European Union through the Instrument for Pre-Accession Assistance (IPA II) and aimed at competitiveness and innovation in Macedonia. The project is implemented by the Cabinet of the Deputy Prime Minister in charge of economic affairs and administrated by the World Bank. The main objective of the Local and Regional Competitiveness Project is to strengthen the contribution of tourism in the local economic development and capacity building of the Government and public institutions in order to stimulate the development of tourism and facilitate destinations management. LRCP provides the financial assets for capacity building that contribute to further development of the tourism sector, destinations investment and support their progress. The project will support selected tourist destinations in the country through the combination of technical support in order to improve destination management, infrastructure investment and innovation investments.

The overall objective of the sub-project “Economic valorization of cultural and alternative tourist offer of the Tsar’s towers in Tourist destination Strumica” is to promote cultural and archaeological tourism in tourist destination Strumica and its surroundings, by promoting and improving the conditions for development of alternative tourism at the site of “Tsar’s Towers” (Carevi Kuli).

The specific objectives of the sub-project are:

- To improve the cultural and archaeological area at the Tsar’s Towers site and preserve the authentic appearance of the fortress, the towers and ramparts and
- To modernise the trails that lead tourists and visitors to the site.

To achieve the set of objectives, the sub-project envisages the implementation of two larger activities of which one is about reconstruction, restoration and conservation of towers and ramparts of Tsar’s Towers, while the other is about rehabilitation and arrangement (urban landscaping) of existing hiking trails for alternative tourism, thus reviving and modernising the wider location around this cultural and historical monument and enriches the tourist offer of the Municipality of Strumica.

In accordance with the Conservation approval under UP No. 08-892 from 15.11.2019 issued by the Ministry of Culture - Cultural Heritage Protection Office of the Republic of North Macedonia ([Annex 1](#)), the project decision is in accordance with the physical condition and values of the protected wealth and work activities may be performed according to the project.

1.3 Legal and institutional frameworks

The following legal and institutional frameworks have been taken into account in the process of development and subsequent implementation of the CHSMP. The list of regulations and relevant documents on proposed cultural heritage management measures includes:

Law on Protection of Cultural Heritage

- Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 20/04 dated from 02.04.2004);
- Law on Conservation of Cultural Heritage, consolidated text (Official Gazette of the Republic of Macedonia No. 20/04, 71/04, 115/07, 18/11, 148/11, 23/13, 137/13, 164/13, 38/14, 44/14, 199/14, 104/15, 154/15, 192/15 and 39/16);
- Law on Ratification of the Convention for Protection of Non-Intellectual Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 59 dated from 12.05.2006);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 18 dated from 25.09.2011);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 18 dated from 14.02.2011);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 148/2011);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 23/2013);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 164 dated from 27.11.2013);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 38 dated from 24.02.2014);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 44/2014);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 199/14);

- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 154/15);
- Modification and Amendment to the Law on Protection of Cultural Heritage (“Official Gazette of Republic of Macedonia” No. 39/16).

Article 2

According to the Law on Protection of the Cultural Heritage of the Republic of Macedonia, cultural heritage is the total material and immaterial well with archaeological, ethnological, historical, artistic, urban, social and other scientific values, contents and functions, which have cultural and historical value and are protected by law as a result of their value. The cultural heritage is categorised as movable and immovable. The Law on Protection of Cultural Heritage establishes a protocol for all stakeholders involved in the activities for cultural heritage preservation and management.

The Law on Protection of Cultural Heritage also foresees preparation of Cultural Heritage Management Plan which should contain proposed measures and activities for the protection of the cultural heritage as well as potential factors and risks which represent the risk of cultural heritage.

Article 4

Paragraph 1 - The main objective of the law is the protection of cultural heritage in its original state.

Paragraph 2 - The operational purpose of protection is to undertake activities to prevent actions and impacts that are carried out or which may result in damage, destruction, dissolution, degradation and illegal appropriation of cultural heritage.

Article 65

Article 65 of the Law on Protection of Cultural Heritage states: (1) If an archaeological site or objects (items) of archaeological importance are discovered during the construction, agricultural or other works, the contractor shall be obliged to:

1. Report the discovery in accordance with Article 129 of this Law;
2. Stop the works and secure the site from possible damage and destruction, as well as from unauthorised access;
3. Keep discovered objects (items) in the place (at the site) and in the state in which they were found.

(2) Notwithstanding paragraph (1) of this Article, if the objects (items) are excavated or removed for their better protection or in the circumstances, the Contractor shall:

1. To hand over the discovered objects (items) when reporting them or to do so during identification within the meaning of Article 66 of this Law, and to take measures which are necessary so as not to fail and not to be damaged or alienated and
2. Provide all relevant data regarding the location and position of the objects (items) at the time of discovery and the circumstances under which they were made.

OP / BP 4.11 Physical Cultural Resources

The Physical Cultural Resources Policy is activated when sub-projects in the sub-component 3-1 Infrastructure potentially include projects with direct or indirect impacts on immovable cultural resources. The aim of this procedure is to support institutions in the area of removal and mitigation of negative effects on physical cultural values in the development of projects funded by the World Bank. The potential impacts on physical cultural resources that may arise from project activities, activate the policy of the World Bank, according to which a plan for the management of cultural heritage affairs should be developed as part of the in-depth analysis procedures.

2. Development, methodology and procedures for the Cultural Heritage Site Management Plan

2.1 Main data sources

The following existing resources and documents have been utilised in the process of gathering information and data for the needs of preparing the current CHSMP:

- Environmental and Social Management Plan for the sub-project “Economic valorization of cultural and alternative tourist offer of the Tsar’s Towers in tourist destination Strumica”
- The application form of the sub-project “Economic valorisation of cultural and alternative tourist offer of Tsar’s Towers in tourist destination Strumica”, drafted by the Municipality of Strumica.
- The Project for arranging and improving access to Tsar’s Towers 2020, drafted by the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica and the Municipality of Strumica.
- Strategy for development of tourist destination Strumica 2020 – 2030
- Programme for Development of the Southeast Planning Region 2015 – 2019;
- Tourism Development Plan for Strumica and Surroundings (One of 10 Tourism Development Plans for North Macedonia);
- Existing scientific and specialised publications of the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica related to the CHS Tsar’s Towers.
- Annex 2 on the Project for conservation, restoration and partial reconstruction of the ramparts and towers in the Tsar’s Towers fortress in Strumica on foreseen activities on immediate protection of the project “Economic valorization of cultural and alternative tourist offer of Tsar’s Towers in tourist destination Strumica” - with tech. number 02-178 from October 2019 with a report from Audit;
- Main conservation project for the lighting of the ramparts of the Tsar’s Towers fortress in Strumica - with tech. number 02-178/1 from October 2019 with a report from Audit;
- Main conservation project for the construction of access trails and stairs with candelabras from Loven Dom to the north tower of the Tsar’s Towers fortress in Strumica - with tech. number 02-178/2 from October 2019 with a report from Audit;
- Positive report (No. 09-179/21 from 13.11.2019) was prepared after performing of expert control of conservation projects by a committee appointed by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica with a Decision No. 09-179/20 from 12.11.2019;
- Geodetic elaborate for geodetic works activities for special purposes for preparation of an updated geodetic base for the Tsar’s Towers site with No. 0809 -220/3 from 01.11.2019;
- Elaborate for geotechnical research and analysis on the part of the terrain at the Tsar’s Towers site in Strumica with No. 490-2 from 30.09.2019 prepared by the Faculty of Civil Engineering “Ss. Cyril and Methodius” - Skopje;
- Opinion by IZIIS on the designed degree of mechanical resistance, stability and seismic protection of the building with No. 0807-2086/3 from 07.11.2019;
- Prepared report after performing of conservation supervision of works activities on immediate protection, conservation, restoration and partial reconstruction of the Tsar’s Towers fortress in Strumica, phase 2 within the framework of EU funded project with No. 03-547/1 from 29.10.2017;
- Final report on completed conservation and construction activities and interventions on the part of the Tsar’s Towers fortress in the period from 2014 to 2015 with tech. No. 07/25 -1 from 24.03.2019.
- Tsars Tower Strumica – History, Culture, Discoveries - from prehistory to the Middle Ages - Research by Institute for Protection of Cultural Monuments and Museum" – Strumica.

2.2 Institutions and involved parties

The following institutions/organisations/stakeholders have been identified for the needs of developing and implementing the present CHSMP:

The Ministry of Culture of the Republic of North Macedonia and the Cultural Heritage Protection Office, as an institution within the Ministry of Culture, are responsible for the protection of the immovable and movable cultural heritage in the Republic of North Macedonia. The Cultural Heritage Protection Office and the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica, have cooperation in terms of conservation and development of cultural heritage, while some of their competencies include the legal procedures and performing activities related to conservation and access to cultural heritage.

The Municipality of Strumica is responsible for the entire implementation of the sub-project "Economic valorization of cultural and alternative tourist offer of Tsar's Towers in tourist destination Strumica" in cooperation with the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica and the Cultural Heritage Protection Office in North Macedonia. The proposed activities within the sub-project "Economic valorization of cultural and alternative tourist offer of Tsar's Towers in tourist destination Strumica" will not cause any changes in the cultural heritage, because they are in accordance with the Law on Cultural Heritage of Special Importance, where the direct protection of the Tsar's Towers is in accordance with the detailed parameters given by the project which is professionally prepared and approved by the appropriate institutions for protection of the cultural heritage.

The National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica was established as a provincial museum in 1952. On 01.01.2005 the institution grew into a regional conservation centre responsible for Strumica, Dojran Valandovo Bogdanci, Gevgelija and their environments. The archaeological site of "Tsar's Towers" is a cultural monument whose status was determined by Decision no. 925 dated 16.09.1998 brought by the Institute for Protection of Monuments of Culture, Natural Rarities and Museum – Strumica. Based on this decision for the cultural monument, it is registered in the Central Registry No. 925 of the Immovable Monuments of Culture of the Republic of North Macedonia, while in the Municipal Register of Immovable Monuments of Culture on the territory of the Municipality of Strumica it is registered under reg. no. 3 from 19.08.1998.

The Municipal Enterprise for Public Utilities "Komunalec" - Strumica is the institution responsible for all community-related services and maintenance. MEPU's main activities include waste disposal and recycling, maintenance of building infrastructure, maintenance of public areas, etc. The MEPU shall be directly involved in the implementation of the operational plan of the CHSMP.

2.3 Public consultations

In accordance with the requirements of the ESMF, the prepared Cultural Heritage Management Plan (CHMP) is a part of the tender documentation and the contract with the contractor (along with the accounting records) that will be obliged to implement the envisaged measures in accordance with the Mitigation Plan. The implementation of CHMP is mandatory for the contractor and the final Beneficiary.

The supervisory body engaged by the Municipality of Strumica and/or LRCP PIU has the obligation to monitor and evaluate the implementation of the proposed measures under the Monitoring Plan and to inform the Contractor and the Project Office of the LRCP PIU. The Municipality of Strumica will report on the state of the environment and the cultural heritage and on the implementation of the mitigation and monitoring measures in the regular sub-project reports and in the special report on the implementation of

CHMP. In accordance with the ESMF, this CHMP will be publicly consulted before the final approval of the sub-grant. Once the CHMP has been approved by the expert of the PIU and the World Bank Specialist, it will be published on the website of the PIU, the Agency for Promotion and Support of Tourism and on the website of the Municipality of Strumica, where it will be available for comments for at least 14 days. The printed version will be available in the PIU and the Municipality of Strumica. The debate is scheduled to take place in the Municipality of Strumica on the **11.03.2020**. Actively, the Applicant informs and invites all the stakeholders including local NGOs, affected communities and provides the appropriate funds. The relevant essential comments as well as the comments from the public debate will be included in the final version of the CHMP and will be included in the Public Debate Report and will be part of the final version of CHMP.

The CHMP should be publicly available and published in English, Macedonian and Albanian language. The implementation of the Environmental and Social Management Plan and the CHMP ensure timely undertaking of the proposed measures and contribute to the implementation of project activities without any significant effects on the environment or cultural heritage.

2.4 Development stages of the CHSMP

At its current revision, the CHMP has been prepared for the foreseen activities within the framework of the sub-project "Economic valorisation of cultural and alternative tourist offer of the Tsar's Towers in tourist destination Strumica", implemented under the Local and Regional Competitiveness Project (LRCP). As such it represents an integral part of the Environmental and Social Management Plan (ESMP) of the sub-project.

Additional revisions of the CHSMP shall be carried out after the completion of key stages of the activities on the CHS, as well as prior to the initiation of future interventions on the Site.

3. Current conditions and development potential of the CHS

3.1 Access and the current image of the Cultural Heritage Site

The Tsar's Towers CHS is located in the south-eastern part of the Republic of Macedonia, within the territory of the Municipality of Strumica. The wider site covers the belt around the southwestern periphery of the city, which is out of urban reach and is mostly hilly and steep. The fortress and the whole archaeological site "Tsar's Towers" is located on the top of the hill Cham Chiflik, above the city of Strumica. The CHS rises on the south side above the city of Strumica at 455 meters above sea level. The fortress has an elongated oval base and extends 210 meters east to west and about 90 meters northwest to south. From the northwest side, steep valleys descend to the foothills of the torrential rivers Koritnica and Sv. Ilia torrent.

At present, the access to the CHS is ensured via an existing traffic link from Strumica to "Tsar's Towers", which is represented by local road, with a length of 7,1 km, through the villages of Popcevo and Cham Chiflik to the necropolis. In addition, there is a steep pedestrian path of about 1 km and a damaged Trim Trail from "Loven Dom" to the monastery of St. Ilja, in length of 2.33 km.

Strumica as one of the most important economic and cultural centres in Southeast Macedonia has grown into a recognisable tourist brand that attracts many tourists and thus contributes to the local economic development of the municipality. At the core of its long-term efforts to ensure the sustainable development of tourism, the Municipality of Strumitsa has decided to establish and promote a destination brand of the city and the region of Strumitsa, as part of the community's effort to express its identity, unique characteristics and competitive advantages with the purpose to promote the city and the region as an attractive destination for tourism, business, recreation and living.

The adopted Tourist destination brand "Strumitsa – a star under the sky" expresses the efforts of the community to ensure the strategic development of tourism in the wider Strumica area. The CHS Tsar's Towers, a symbol of the city and the most recognisable landmark of Strumica, together with the Orta Mosque, Roman baths in the village of Bansko, the Monastery complex in Vodoca and Veljusa are the most visited sites by tourists, visiting the region. Tsar's Towers stand at the core of the newly established destination brand of Strumitsa and it is presented in all visual elements, related to the destination brand.

3.2 Preservation and conservation of the Cultural Heritage Site

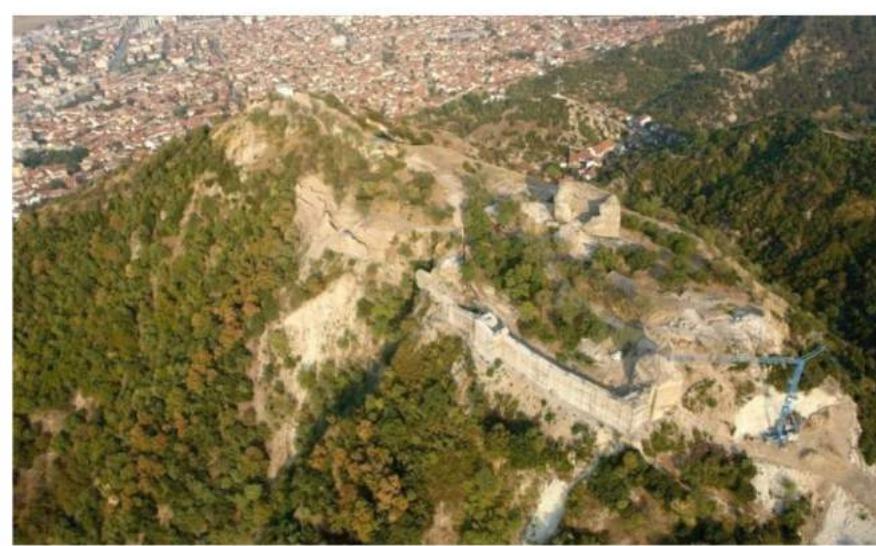
The CHS Tsar's Towers has been declared as a cultural heritage of special importance. The Decision to declare the archaeological site Tsar's Towers as a cultural heritage of special importance with No. 925 dated from 16.09.1998 and has been issued by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica. The Law on the Protection of Cultural Heritage prevents activities and effects that may damage and degrade this cultural monument and provides for the preservation of its historical and cultural values.

Studies have shown that the fortress has an elongated elliptical base. Inside the fortress, there were different objects (items) of economic and residential character, service and protection.



Picture 1: An old picture showing the layout of the South Tower portal

The Tsar's Towers as a fortress has been the subject of much research so far, which has improved the condition of the fortress by retaining its authentic outlook. According to archaeological excavations, research and other studies performed by relevant institution, the significant historical and cultural value of the Tsar's Towers has been determined and established. Chronologically, the first excavations and research were made in 2002 and 2004, and in 2005 new archaeological excavations of 288 m² were continued in order to define the object (facility) to the east of the Donzon Tower (Pyrg). In 2007, a project funded by the European Union revealed the ramparts of the west and east sides, the northeast and southwest entrances of the fortress, the cistern, etc. Then, the necropolis located on the crest south of the fortress and cemetery from the beginning of the IV century and the second half of the IV century.



Picture 2: Conservation, restoration and reconstruction works on part of the Tsar's Towers fortress

In 2009, systematic archaeological research was funded by the Government of the Republic of Macedonia as a capital project, which conducted an entire study of the south-eastern plateau and 2/3 of the central plateau. In this research, a total of 42 tombs belonging to different periods were discovered. In 2008, within the project mentioned above conservation, restoration and partial reconstruction of approximately 80 meters of the western rampart were implemented. During 2013, as part of the implementation of the "Heritage" project, funded by the European Union, most of the restoration and conservation work was implemented and therefore now we have a well-preserved situation. In 2014, the southwest tower was almost completely reconstructed, as well as part of the entrance gate, northwest tower and northwest rampart.

The envisaged activities of the current CHSMP and planned sub-project activities do not change the cultural and historical heritage of the Tsar's Towers fortress and the original outlook of the fortress and do not plan activities that would harm the cultural heritage. The relevant institutions will strictly supervise all civil work activities.

Article 65 of the Law on Protection of Cultural Heritage states that "if archaeological findings are found during construction works, the contractor/investor shall be obliged to submit a report to the competent institution in accordance with Article 129 of the Law on Protection of Cultural Heritage within 3 days. Also, the contractor is obliged to stop all construction works. This project does not plan and envisages archaeological excavations.

According to the Law, all involved, relevant and competent entities are obliged to respect and act in accordance with the regulation. The Municipality of Strumica, as an applicant and beneficiary of the funds of this grant in accordance with the legal regulations, during the implementation of the activities, will require the contractor and the supervisor to carry out the activities, as required, in order to preserve the cultural heritage.

3.3 Measures to avoid, mitigate and reduce the impact on cultural heritage

Due to the risk of possible adverse effects on the authentic outlook of the ramparts and towers of the Tsar's Towers fortress, such as a derogation from the Law on Protection of Cultural Heritage through the use of building material inappropriate with the outlook of the ramparts and towers of the Tsar's Towers to avoid, mitigate and reduce the effects on cultural heritage, the following measures are proposed:

- Conducting activities for conservation, restoration and reconstruction in accordance with the project documentation approved by the competent institutions (Cultural Heritage Protection Office, Conservation Approval UP No. 08-892 from 15.11.2019);
- Creation of favourable conditions for maintaining the integrity of the buildings according to the conservation conditions issued by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica;
- Adjustment of the outlook, colour and other parameters for the objects (facilities) that are conserved with the existing authentic documentation;
- Implementation of the Environmental and Social Management Plan (ESMP) and the Cultural Heritage Management Plan (CHMP).

A detailed list of potential measures that will be taken into account in the process of implementing the CHSMP has been provided in [Chapter 6: Monitoring and Evaluation](#).

3.4 Visitors Management

Despite the implemented reconstruction and restoration works that have been carried out over the past 10 years, the access to the CHS is difficult and unregulated. The entire site is surrounded by a steep gorge that makes it rather dangerous for potential visitors. Due to lack of resources, the main visitor management facilities and necessary interventions (like the construction of protective fences, improvement of pedestrian networks and other open surfaces that are in exceptional degraded condition) are missing or in a very poor state. At present, the CHS lacks a Visitors Management Plan.

3.5 Security and accessibility

As mentioned above, due to the lack of funding and resources, access to the CHS is somewhat chaotic and unorganised. There is no security system in place. The site is not secured as there is no security personnel on the site. Local medical institutions handle emergencies.

3.6 Ownership and funding

At present, the institution that is directly responsible for the operation and management of the CHS Tsar’s Towers is the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica. The municipal administration of Strumica is legally responsible for the maintenance and preservation of all public properties/facilities, located/operating on its territory.

3.7 Capacity building

All stakeholders, interested parties and individuals involved in the implementation of the activities and projects that fall within the scope of the CHSMP should be informed about the specifics of the preservation and management of the physical cultural heritage.

The aim of such capacity building and awareness-raising initiatives is to enable non-professionals to identify dangers to movable and immovable cultural heritage, prevent damage to cultural heritage, register and report on any cultural heritage.

Additionally, upon approval of the CHSMP, the broader community and potential stakeholders in the process of developing and implementing the Plan should be presented with its main objectives, envisaged activities and foreseen action plans.

4. Objectives of the Cultural Heritage Site Management Plan

4.1 Objectives of the CHSMP

The overall purpose of the CHSMP is to set out a participatory framework for the protection, conservation and management of the CHS Tsar’s Towers that bring together various policies and stakeholders for its implementation as well as ensure protection of CHS features and values.

The aim of the CHSMP is protection, elimination and reducing the adverse effects on the cultural heritage in accordance with the World Bank policies and procedures on physical cultural heritage and the Law on cultural heritage protection of the Republic of North Macedonia. This first version of the Cultural Heritage Site Management Plan of the Tsar’s Towers takes into account the specifics of the processes related to the conservation of the CHS, the various uses and interests and the practical realities of management and operation. As a result, the following specific objectives have been defined:

- To establish a sustainable and participatory approach to ensure the preservation, management and operation of the CHS.
- To ensure visitor and communities’ access and safety and guarantee the safeguarding of the cultural heritage, value and current state of the CHS.
- To ensure the preservation and sustainable development of the CHS.

- Fostering the participation of the local community and stakeholders in the process of implementing the CHSMP.

In order to achieve the abovementioned objectives, while adhering to the WB OP/BP 4.11 Physical Cultural Resources, the implementation of the CHSMP will rely on the following main principles:

- **Sustainability** of planning and implementation;
- **Shared responsibility** and joint actions to achieve the goals of the CHSMP;
- **Communication and participation** of all actors involved in the implementation of the CHSMP;
- **Fostering ownership** of the CHS among the local community to help achieve the objectives of the CHSMP.

In addition to setting the mandatory measures to mitigate project risks to cultural heritage, the present CHSMP represents a statement of commitment of various stakeholders that sets out a robust framework for the development, protection, conservation and subsequent management of the Cultural CHS Tsar’s Towers. Moreover, the CHSMP can serve as a blueprint for the development of the Tsar’s Towers Site .

5. Action plans of the CHS

5.1 Conservation and reconstruction plan

Despite the numerous activities and implemented projects by the Municipality of Strumica for reconstruction, conservation and revitalisation of the site, there is not yet a fully-established, operational and accessible CHS providing visitors with a complete and attractive exterior appearance, modern, safe and accessible infrastructure, alternative tourism and biking trails.

The activities for conservation, restoration and reconstruction of the Tsar's Towers fortress started in 2007, and the overall activities so far have been divided into several main phases, as follows:

- ❖ **Phase I - Archaeological, architectural and conservation research and providing accessibility to the site.** Completed in 2013. This phase was implemented in the period from 2007 to 2013 and was funded by the European Union, under the CARDS Programme and by the Government of the Republic of North Macedonia. The vehicular access to the site has been ensured through the construction of the local road Strumica – Popchevo. The road was constructed with funds from the World Bank and the Municipality of Strumica in 2013.
- ❖ **Phase II - Reconstruction and restoration of parts of the Tsar's Towers site.** Completed in 2015. This phase included the restoration and reconstruction of parts of the towers and ramparts of the site. It was implemented in the period from 2014 to 2015 and was funded by the European Union under the IPA Cross-Border Cooperation Programme.
- ❖ **Phase III - Economic valorisation of cultural and alternative tourist offer of the Tsar's Towers in tourist destination Strumica.** This phase is planned to be implemented in 2020 with the financial support of the European Union and the Government of the Republic of North Macedonia under the Local and Regional Competitiveness Project, administered by the World Bank.
- ❖ **Phase IV - Arranging and improving the access to Tsar's Towers** – this phase will be carried out in parallel with Phase III. It will be carried out by the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica. The phase envisages the implementation of activities that will aid to improve the current state of the CHS, facilitate the access to the Site and support the final presentation of Tsar's Towers as a fully operational and accessible tourist site and part of the Strumica brand.

The current CHSMP covers Phase III (activities under the LRCP Project) of the activities for conservation, restoration and reconstruction of the Tsar's Towers fortress, as well as relevant future activities related to the operation, maintenance and management of the CHS. While the Phase IV is not a part of the project, it can be considered an associated activity and as such subject of the EA for this sub-project. Additionally, phases related to the further conservation and reconstruction of the CHS should be carried out in accordance with the relevant legislation of the Republic of North Macedonia and the adopted international practices in the field of CHS management. A detailed Time plan for implementation of Phase III and Phase IV of the CHSMP of Tsar's Towers in Strumica is provided in [Annex IV](#) of the present CHSMP.

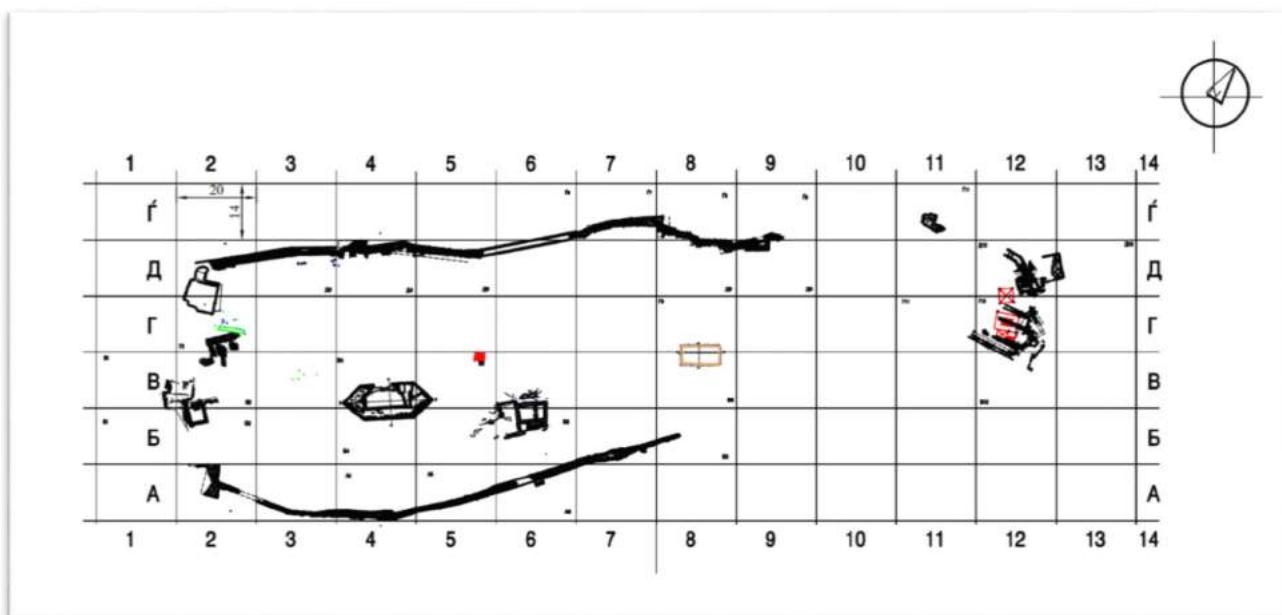
The implementation of any additional phases of reconstruction and restoration of the CHS in the future should be carried out in compliance with the provisions, stipulated in the current CHSMP. Below is described Phase III and associated Phase IV of the activities for conservation, restoration, reconstruction and improving access to the CHS Tsar's Towers.

5.1.1 Phase III: Economic valorisation of cultural and alternative tourist offer of the Tsar's Towers in tourist destination Strumica

As part of Phase III, which will be carried out in the frame of the sub-project "Economic valorisation of cultural and alternative tourist offer of the Tsar's Towers in tourist destination Strumica" the following set of activities/projects will be carried out with the aim to restore, conserve and improve the overall access to the cultural and archaeological area of the CHS:

Project 1. Conservation, restoration and partial reconstruction of the ramparts and towers in the Tsar's Towers fortress in Strumica¹

The project for the conservation, restoration and partial reconstruction of the ramparts of the Tsar's Towers fortress is prepared on the basis of previously performed archaeological and conservation research, conservation-research work activities, work activities on the immediate protection within the framework of which international norms and regulations have been followed. The archaeological discoveries, architectural and conservation research which are being performed during a period of ten years by domestic and international experts, have created conditions to localise the construction elements of the medieval fortress, that is the ramparts, entrance gates, defence towers, interior sites and other buildings (facilities), to the extent that the outline of the once complex medieval fortress has been determined. The extent of the destruction, the reasons for it and the opportunities that allow it to be reconstructed, are also known. As part of the project and based on the prepared technical documentation, the following work activities on the main project have been determined:



Picture 3: Map and overlay of the fortress

A) Preparation work activities for the entire Tsar's Towers site

Clearing the terrain at and around the fortress prior starting construction interventions, shaping and levelling the trail for transport of material from platform to the northern tower and eastern rampart; preparation of storage space for the materials; removing all damaged and broken parts (that had lost co-existence) and cleaning to the intact layer; that is to calcified mortar associated with stone in the monolith; removing moss, lichen and vegetation from the rampart walls and remediation of each segment separately; separating the material for reuse (stone and brick);

¹ **Technical documentation reference:** Annex 2 on the Project for conservation, restoration and partial reconstruction of the ramparts and towers in the Tsar's Towers fortress in Strumica on foreseen activities in immediate protection of the project "Economic valorization of cultural and alternative tourist offer of Tsar's Towers in tourist destination Strumica" - with tech. number 02-178 from October, 2019 (prepared by Univerzal Gradba - Strumica);

B) Reconstruction, restoration and rehabilitation works

B.1 Northern tower, north-eastern rampart and north-western rampart (Continuing the restoration and reconstruction of the partially constructed northern tower; restoration and reconstruction of a part of the north-eastern and north-western rampart; reconstruction of stone stairs for entering the northern tower through walk trail of the rampart; reconstruction of temporary single stairs to access the fortress from its outer side; setting protection metal fences on places of the rampart which are critical in order to achieve physical protection of visitors);

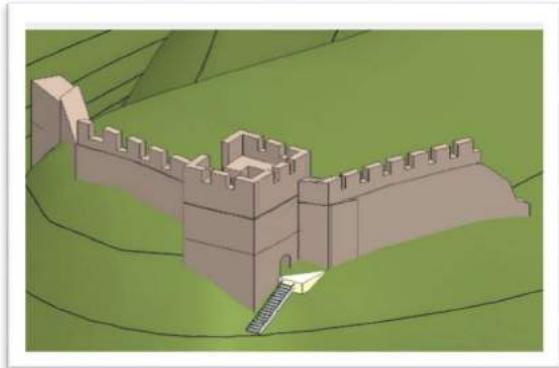
B.2 Eastern rampart (Conservation and restoration of the medieval eastern rampart; conservation and restoration of the remains of the ancient rampart which are located on a part of the eastern rampart; ground embankment from the interior side along the eastern rampart appropriate to the terrain; setting protection metal fences on places of the rampart which are critical in order to achieve physical protection of visitors);

B.3 South-western rampart (Continuing the partial reconstruction of the partially built south-western rampart; construction of single wooden stairs to the south-western tower with a wooden fence to access the walking trail of the south-western rampart);

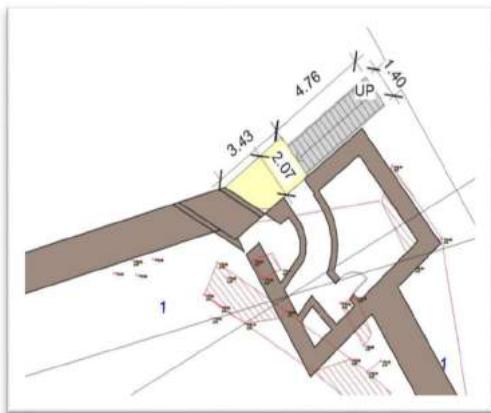
B.4 South portal and south-eastern tower (Conservation and partial restoration of the south-eastern tower; continuing the partial reconstruction of the partially built rampart between the south portal; shaping the already existing temporary access trail of stone to access the south portal (entrance) in the fortress; construction of temporary metal stairs with landing to access the south portal (entrance) in the fortress with metal fence that are planned to be in continuation of the already existing temporary stone trail; setting protection metal fences on places of the rampart which are critical in order to achieve physical protection of visitors;)



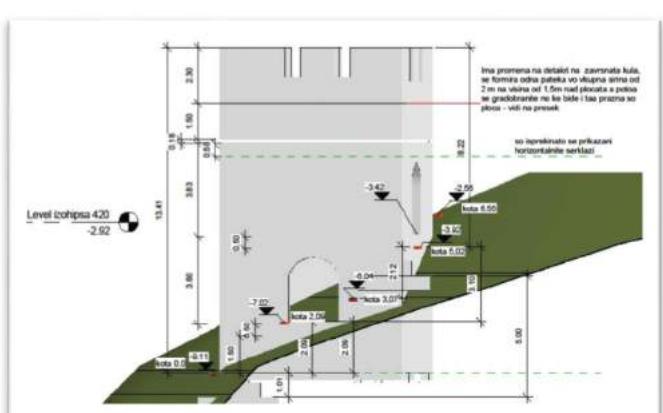
Picture 5: Outlook of the northern tower and ramparts with the planned restoration, marked in yellow



Picture 4: 2D outlook of the reconstructed northern tower with ramparts (from the outer side)



Picture 7: Construction of stairs to the Northern tower



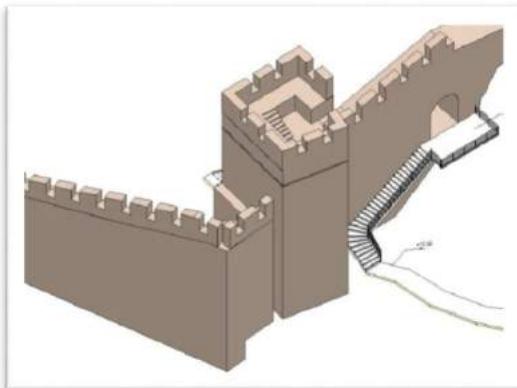
Picture 6: Tower details and elements



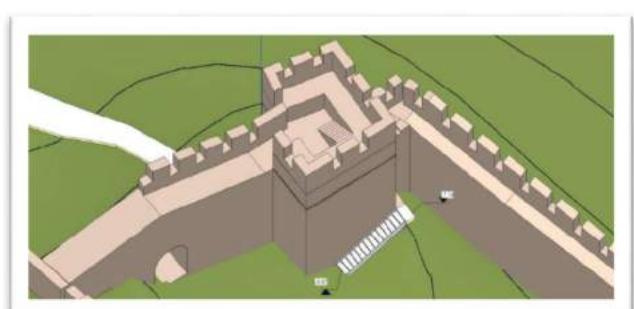
Picture 13: 3D Outlook of the reconstructed Northern tower with ramparts (from the inside)



Picture 12: Outlook of the western rampart with the planned restoration marked in yellow



Picture 14: 2D outlook of the south gate



Picture 15: 3D outlook of the accession wooden stairs beside the south-west tower to the west wall



Picture 17: Outlook of southern gate with planned conservation and restoration marked with yellow and marked access stairs



Picture 16: Outlook of the eastern rampart with the planned conservation marked in yellow

Details and drawings separately for all parts of the fortress to be conserved are given in Annex 2 of the Main project for restoration, reconstruction and conservation of Tsar’s Towers, with the foreseen protection interventions according to the project documentation.

All foreseen interventions of the ramparts and towers of the Tsar’s Towers fortress are derived based on extensive conservation analyses and research, so that the given positions have been accurately determined. Special attention and research have been paid to the configuration of the terrain, which dictated the spreading of the rampart.

All reconstruction, restoration and conservation work activities planned within the framework of this project with dimensions, materials to be used and the origin of the materials, are included in the technical documents of the project and are in accordance with the legal regulations, including the required permits for performing work activities on immediate protection of the fortress, as well as for including a permanent conservation supervision during the implementation of the foreseen activities of the fortress by the competent institution i.e. National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica.

All interventions on the walls of stone of the fortress include a procedure which is contained and described in details in the main project, of which some are extraction of materials for reuse (stone and brick), stone installation inside the walls and reconstruction with natural stones authentic to the original stone. This stone is used from the site itself, with the same structure and dimensions as the installed stone according to the performed analyses and recommendations. The mortar will be prepared in accordance with the recommendations and the recipe by the conservator, while the natural stone is from local quarries. National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica is a supervisory body for all activities for reconstruction, restoration and conservation of the archaeological site Tsar's Towers. Because of that, all materials to be used in the activities mentioned above will be the subject of control, approval and supervision by authorised conservators and will be provided from quarries that have work permits for this type of stone in accordance with the laws in the Republic of North Macedonia. The trails will be reconstructed with reuse of the natural excavated soil and natural stone. For the implementation of these activities, the authenticity and the content of the protected cultural monument will not be disturbed.

An expert statement by the National Committee – ICOMOS Macedonia has been requested for the project: "Conservation, restoration and partial reconstruction of the ramparts of the fortress – Tsar's Towers – in Strumica. It states that the project and all activities have been prepared on a highly professional level meeting all standards, for the proper treatment of immovable cultural heritage, both on a national and at the level of ICOMOS recommendations, especially by respecting the authenticity of the object and applying adequate methods and materials for conservation, restoration and reconstruction of immovable cultural heritage. The expert statement is provided in [Annex 2](#).

Project 2. Lighting the ramparts of the Tsar's Towers fortress²



Picture 19: 3D outlook of the lighting of the Tsar's Towers fortress from south-west

This supporting project has the aim to ensure the efficient and effective lighting of the Tsar's Towers fortress, which highlights the historical value of the object (fortress) and provides a view of the Tsar's Towers, in the evening hours. Within the framework of the project, a lighting of the towers and ramparts will be implemented. The lighting project will feature a total of 37 LED spotlights of 18.6W with total installed power of 688W. It will be taken care of highlighting the towers from the fortress and not to damage the ramparts and towers of the fortress. It is planned to be installed 13 spotlights on the southern portal with the south-eastern tower, 10 spotlights on the south-western rampart, 3 spotlights on the north-

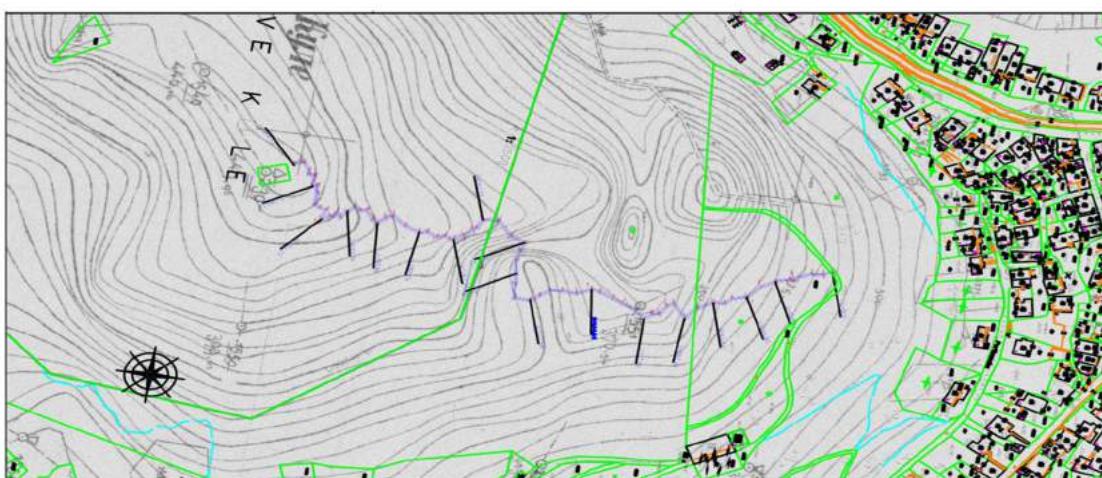
² **Technical documentation reference:** Main conservation project for lighting of ramparts of the Tsar's Towers fortress in Strumica - with tech. number 02-178/1 from October, 2019 (prepared by Univerzal Gradba - Strumica);

western rampart, and 11 spotlights on the northern tower and north-eastern rampart. The spotlights on the southern portal with the south-eastern tower (11) due to the configuration of the terrain will be installed on metal consoles with L=1.3m, while the other 26 spotlights will be installed on concrete fundaments built for that purpose in a distance of 1.5 meters of the fortress. The exact position of each spotlight may be seen in the graphic part. The angle of direction towards the fortress will be 15 degrees. The lighting will be installed in accordance with the conservation project for lighting and the conservation approval, and will not damage the outlook of the fortress and the surroundings. The performance of the lighting activities will be under constant expert conservation supervision. The exact locations of the spotlights that will be installed are provided in the technical documentation of the project.

Project 3. Rehabilitation of access trails and stairs with candelabras from Loven Dom to the north tower of the Tsar's Towers fortress in Strumica³

No new access trails or roads will be constructed under this Project. The main objective is to ensure the urban landscaping of the existing hiking trail from Loven Dom to the northern tower of the Tsar's Towers fortress in the length of 406.31 meters. The project envisages the installation of candelabras (street lights) along the length of the trace, protection metal fence, as well as the construction of stone stairs. Within the framework of the main project, the following work activities have been determined:

- 1) Rehabilitation of the existing access trail and stairs from Loven Dom to the northern tower of the Tsar's Towers fortress in the length of 406.31 meters.** (Marking and securing the route; Cleaning of the terrain; Manual ground excavation with loading and transport of excavated material to the dump; Construction of reinforced concrete stairs with setting a top layer of stone slabs).
- 2) Lighting the staircase access trail from Loven Dom to the northern tower of the Tsar's Towers fortress** (Installation of 45 candelabras, warning strips, excavation and concreting of pillar poles for candelabras, cables, earthling, etc.).
- 3) Installation of a protective fence on the access trail from Loven Dom to the northern tower on the Tsar's Towers fortress** (Installation of protection fence along the length of the route, installation works).



Picture 20: Marked route for construction of access trail with candelabras and foundation

³ **Technical documentation reference:** Main conservation project for creation of access trails and stairs with candelabras from Loven Dom to the north tower of the Tsar's Towers fortress in Strumica - with tech. number 02-178/2 from October, 2019 (prepared by Univerzal Gradba - Strumica);

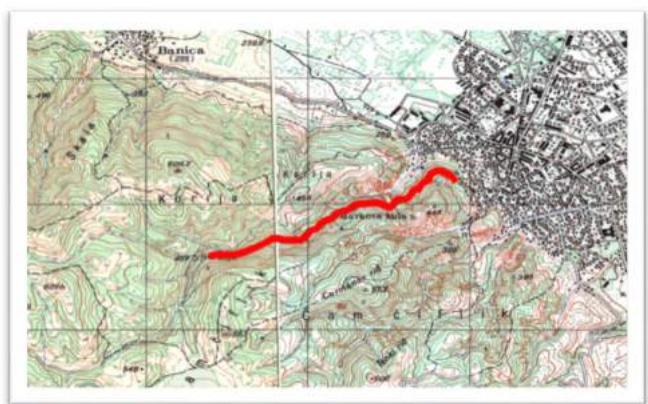
Project 4. Urban landscaping the remaining part of the popular trim trail that leads to the monastery St. Iliah - Strumica⁴

This annex to the main conservation project for the construction of access trails and stairs with candelabras from Loven Dom to the northern tower of the Tsar's Towers fortress has the aim of **urban landscaping existing part of the popular trim trail that leads to the monastery St. Iliah - Strumica**. Within the framework of the annex, the following work activities will be carried out:

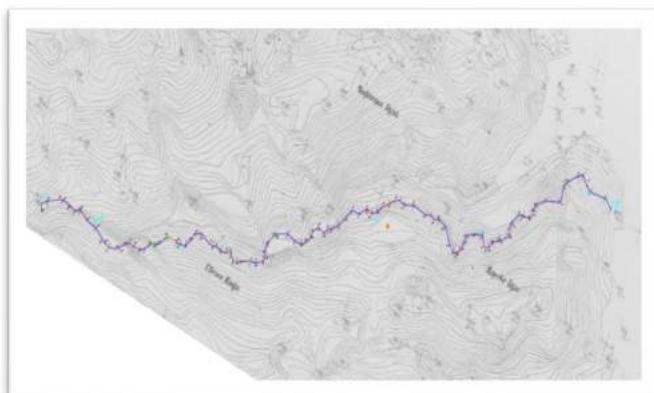
- 1) **Urban landscaping of the tourist trim trail to the monastery St. Iliah – Strumica** (Preparatory work activities; Installation and repair of the metal fence for the safety of the trail; Repair and completion of the existing stone stairs and other activities).
- 2) **Design and construction of family corner** of natural materials for outdoor activities - installation of a gazebo, urban equipment, swings for children and other props made of wood).
- 3) **Installation of wooden signposts and information boards.**



Picture 21: Location of the trim trail where the family corner will be landscaped



Picture 23: Overview of the situation with a marked route of the trim trail from Loven Dom to St. Iliah



Picture 22: Situation with the marked places where investment activities will be performed on the trail (marked in blue, green, orange) and the location of the family corner (marked with a red dot).

⁴ **Technical documentation reference:** Annex - Urban landscaping and finalizing of tourist trim trail from Loven Dom to St. Iliah Strumica towards MCP (Main Conservation Project) for creation of access trails and stairs with candelabras from Loven Dom to the north tower of the Tsar's Towers fortress in Strumica - with tech. number 024/19-П from February, 2019 (prepared by DPI Hidroinzhenering - Strumica);



Picture 24: The current situation of the trim trail with the locations that will be landscaped

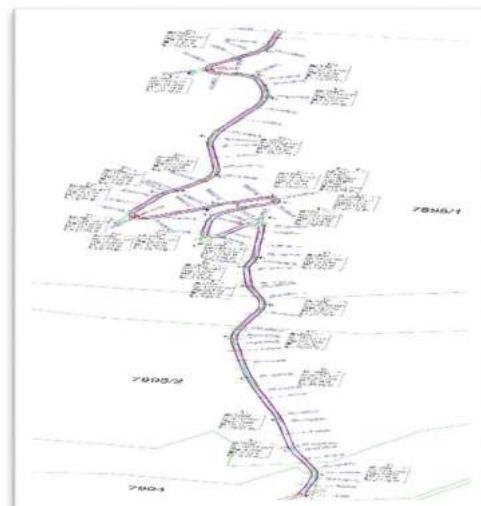
Project 5. Urban landscaping of mountain bike trail to St. Iliah from Tsar's Towers⁵

This main project will include the urban landscaping of the existing mountain bike trail from the monastery St. Elijah to the path which leads to the Tsar's Towers site Strumica in the length of 1.052 km and existing width. Within the framework of the project, the following work activities have been determined:

- 1) **Preparatory works:** Marking and securing the route and cleaning the terrain from low vegetation such as bushes, excavation, loading and transport. The trail will remain within its dimensions.
- 2) **Groundworks:** Machine ground excavation, Compacting the ground; Stormwater collection - Machine excavation of canals in the ground; Creation of buffer layer of crushed stone.



Picture 25: Marked route of the mountain bike trail from St. Elijah to the Tsar's Towers



Picture 26: Situation of the mountain-bike trail

⁵ **Technical documentation reference:** Main project for urban landscaping of mountain bike trail to St. Elijah from Tsar's Towers - with tech. number 62-08/18 from August, 2018 (prepared by DPI Hidroinzhenering - Strumica).

5.1.2 Phase IV: Arranging and improving access to Tsar's Towers⁶

Phase IV will be carried out in parallel with Phase III in accordance with the Time plan provided in [Annex 4 and is considered associated activity](#). As such, all the activities of the Phase IV must be implemented adhering to the national regulation and WB operation policies and procedures. For these activities the Borrower will prepare ESMP, in accordance with the project ESMF, subject to the WB approval. The project for arranging and improving access to the CHS Tsar's Towers 2020 – 2021 has been developed by the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica in partnership with the Municipality of Strumica. The implementation and financial support for the activities, under the project, will be provided by the Ministry of Culture and the Municipality of Strumica.

The phase envisages the implementation of the following activities that will aid to improve the current state of the CHS, facilitate the access to the Site and support the final presentation of Tsar's Towers as a fully operational and accessible tourist site and part of the Strumica brand:

- 1) Improving the access to the Tsar's Towers CHS by cleaning up the access road and the placement of protective banks on dangerous sections.
- 2) Setting – up necessary security facilities.
- 3) Establishing of a drinking water sink for visitors.
- 4) Installing a protective fence on the water cistern inside the CHS (48 meters).
- 5) Installing protective fences at potentially dangerous sections and locations on the Site (123 meters).
- 6) Installing 13 benches and 13 waste bins for the needs of visitors.
- 7) Arranging existing pathways inside the CHS for facilitating and directing visitors (423 meters).
- 8) Horticultural and landscaping activities on the CHS.
- 9) Additional activities related to the improvement of the safety at certain sections of the CHS.
- 10) Installation of a large information board to display tourist information
- 11) Arranging and setting up of small information boards with brief descriptions and photographs of key locations on the Site to support visitor's experience.
- 12) Setting-up a mobile sanitation services – WC for visitors of the CHS.

No visitors will be allowed to the premises until **Phase IV** is completed and site is safe for visitors.

5.1.3 Additional information and publicity activities

In order to support the newly reconstructed CHS, the Municipality of Strumica, as part of the sub-project "Economic valorisation of cultural and alternative tourist offer of the Tsar's Towers in tourist destination Strumica" will carry out a set of activities that will aim to boost the promotion of the CHS, as follows:

- Preparation and design of a website.
- Preparation and design of cards and maps.
- Preparation and design of flyers, guide in Macedonian and English language
- Advertisement (recording and broadcasting a TV advertisement).

5.2 Visitors Management Plan

The main objective of the Visitors Management Plan (VMP) is to provide visitors of the CHS Tsar's Towers with a better experience, safety and security and better access to the CHS and thus contribute for the sustainable development of tourism in Strumica and the wider region.

At present, despite the implemented reconstruction and restoration works that have been carried out over the past 10 years, the access to the CHS is difficult and unregulated. Due to lack of resources, the main visitor management facilities and necessary interventions (like the construction of protective fences,

⁶ The Project for arranging and improving the access to Tsar's Towers 2020 is provided in Annex 3.

improvement of pedestrian networks and other open surfaces that are in exceptional degraded condition) are missing or in a very poor state.

The VMP represents an integral part of the CHSMP of Tsar’s Towers CHS and outlines the main policies and vision of key aspects related to the management of visitors. The main policy of the CHS is to create conditions for experiencing the Tsar’s Towers without compromising the conservation status of the site. Therefore, the following **main principles** have been established:

- Access for all.
- Management of safety of visitors.
- Information and awareness.
- Compliance with the regulations in the field of cultural heritage and CHS management.
- Supporting auxiliary and external activities (tours, concerts, shows, theatre, etc.).
- Fostering volunteering and participation of the community.

Based on the adopted policy and main principles, as part of the VMP and the CHSMP, the following activities will be established, managed and regulated for the main aspects of the VMP.

A graphic representation of the key aspects of the Visitors Management Plan has been provided in [Annex 6: Visitors Management Site Plan](#).

5.2.1 Access to the CHS

Currently, the access to the CHS is ensured via an existing traffic link from Strumica to “Tsar’s Towers”, which is represented by local road, with a length of 7,1 km, through the villages of Popcevo and Cham Chiflic to the necropolis. In addition, there is a steep pedestrian path of about 1 km and a damaged Trim Trail from “Loven Dom” to the monastery of St. Iliah, in length of 2.33 km.

Tables below provide an overview of the planned measures for improving the overall accessibility of the CHS Tsar’s Towers that will be carried out in the framework of **Phase III and Phase IV** of the activities for conservation, restoration, reconstruction and improving the access to the CHS:

Table 1: Improving vehicular access

Activity	Project	Responsible institution
A: Improving access to the Tsar’s Towers CHS by cleaning up the access road and the placement of protective banks on dangerous sections.	Project for arranging and improving access to Tsar’s Towers 2020 (financed by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica)	Municipality of Strumica / National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica
B: Additional arranging of the existing parking area for vehicles (ten vehicles and two busses) in front of the site in its current dimensions.		Municipality of Strumica

Table 2: Improving pedestrians access

Activity	Project	Responsible institution
A: Rehabilitation of access trail and stairs from Loven Dom to the northern tower of the Tsar’s Towers fortress in the length of 406.31 meters	Project 3. Creation of access trails and stairs with candelabras from Loven Dom to the north tower of the Tsar’s	Municipality of Strumica

B: Installation of a protective fence on the access trail from Loven Dom to the northern tower on the Tsar's Towers fortress	Towers fortress in Strumica (financed by LRCP)	Municipality of Strumica
C: Urban landscaping and finalising of the tourist trim trail to the monastery St. Iliah - Strumica in the length of 2.06 km	Project 4. Urban landscaping and finalising the remaining part of the popular trim trail that leads to the monastery (financed by LRCP)	Municipality of Strumica
D: Urban landscaping of the existing mountain bike trail from the monastery St. Elijah to the path which leads to the Tsar's Towers site Strumica in the length of 1.052 km and width of 3.50 meters	Project 5. Urban landscaping of mountain bike trail to St. Iliah from Tsar's Towers (financed by LRCP)	Municipality of Strumica
E: Setting - up necessary security facilities.	Project for arranging and improving access to Tsar's Towers 2020 (financed by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica)	Municipality of Strumica / National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica
F: Variety of safety measures to improve the overall access to the site and ensure the safety of visitors (see 5.2.2).		

Additional measures, aimed at improving the overall accessibility of the CHS have been planned by the Municipality of Strumica and the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica:

- Lighting the staircase access trail from Loven Dom to the northern tower of the Tsar's Towers fortress to support security and access in wintertime, where daytime lighting is insufficient and during days with limited visibility due to weather conditions.
- Establishing of a drinking water sink for visitors.
- Installing 13 benches and 13 waste bins for the needs of visitors on the territory of the CHS.
- Arranging pathways inside the CHS for facilitating and directing visitors (423 meters).
- Design and construction of family corner of natural materials for outdoor activities - installation of a summer house, urban equipment, swings for children and other props made of wood).
- Setting-up a mobile sanitation services – WC for visitors of the CHS.
- Setting-up zones of the CHS (see 5.2.3).
- Information and awareness measures for visitors (see 5.2.3).

At present, due to the current characteristics of the CHS (i.e. environment, terrain, pathways, etc.) the accessibility for people with disabilities cannot be provided to the entire CHS. The Municipality of Strumica shall explore possibilities to ensure such access in the near future.

5.2.2 Managements of visitors safety

The safety of the visitors stands at the pinnacle of the VMP. Therefore a variety of measures have been planned and will be implemented in the framework of the CHSMP.

Safety infrastructure

Improving the safety of visitors by installing safety equipment (fences) at particular (risky) locations of the CHS. Such measures will include the installing protective fence on the water cistern inside the CHS (48

meters) and installing of protective fences at potentially dangerous sections and locations on the Site (123 meters). Both activities will be implemented in the frame of the Project for arranging and improving access to Tsar's Towers 2020 of the National Institution "Institute for Protection of Cultural Monuments and Museum" – Strumica.

Zoning

The CHS will be divided into two zones. Zone A will be accessible on a 24/7 basis and will be situated outside of the CHS itself in order to allow the residents of Strumitsa to visit the area around the CHS, outside working hours. Zone B will include the CHS itself and the access will be based on the adopted working hours. Visitors will be informed on the access rules in both zones, through the information boards and other signage. Seasonal / temporal limit of site usage will be carried out in the event of an emergency, severe weather conditions, external events/activities, etc.

Emergency plan

In case of emergency, the CHS will have an adopted emergency/evacuation plan/scheme. It will be displayed at a visible location on the main entry points to the site. The staff which will be available on the CHS will be trained in providing first aid to visitors.

The estimated time of arrival of emergency vehicle (i.e. ambulance) to the site of the CHS from the nearest hospital in the town of Strumica is 10 minutes.

Code of conduct

A visitor's code of conduct will be prepared for the CHS and displayed at the main entry points of the site. It will provide information on the behaviour norms for the visitors, restrictions on items to be carried out on the site, vandalism warnings, tips and advice for a better visitor's experience, etc. It will result in more visitors adopting appropriate behaviours that will reduce impacts and provide them with a more pleasant visit.

Visitors monitoring

For the needs of both ensuring the safety of the visitors, as well as in order to reduce the negative impact on the CHS, including vandalism and misconduct, visitors monitoring will be carried out on the CHS. Initially, the monitoring will be carried out by the assigned security and administrative personnel on the site. In addition, a video monitoring system (through video cameras) will be installed on pre-defined locations, in and around the CHS. Additional security of the CHS will be ensured through the installation of metal doors (see attached images of the envisaged doors in [Annex 3](#)) that will limit the access to the CHS outside working hours.

5.2.3 Information and awareness

Table 3 provides an overview of the planned works and activities for improving the information and awareness of the CHS Tsar's Towers that will be carried out in the framework of Phase III and Phase IV of the activities for conservation, restoration, reconstruction and improving access to the CHS.

Table 3: Information and awareness infrastructure

Activity	Project	Responsible institution
A: Installation of a large information board to display tourist information	Project for arranging and improving access to Tsar's Towers 2020 (financed by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica)	Municipality of Strumica / National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica
B: Arranging and setting up of small information boards with brief descriptions and photographs of key locations on the Site to support visitor's experience.		

C: Arranging pathways inside the CHS for facilitating and directing visitors (423 meters).		
D: Installing wooden signposts and information boards along the access trails and stairs from Loven Dom to the north tower	Project 3. Creation of access trails and stairs with candelabras from Loven Dom to the north tower of the Tsar’s Towers fortress in Strumica (financed by LRCP)	Municipality of Strumica
E: Installing information board on the old trim trail to the monastery St. Iliah - Strumica	Project 4. Urban landscaping and finalizing the remaining part of the popular trim trail that leads to the monastery (financed by LRCP)	Municipality of Strumica
F: Installing information board at the starting location of the mountain bike trail to St. Iliah	Project 5. Urban landscaping of mountain bike trail to St. Iliah from Tsar’s Towers (financed by LRCP)	Municipality of Strumica

The location of the information and awareness infrastructure is displayed on the Visitors Management Site [Plan \(Annex 6\)](#).

Online and on-site promotion

The Municipality of Strumica will carry out a set of activities that will aim to increase the awareness on the CHS among the local community and visitors in the region. For that purpose, as part of the sub-project “Economic valorisation of cultural and alternative tourist offer of the Tsar’s Towers in tourist destination Strumica”, the following activities will be implemented:

- 1) Preparation and design of a website for the newly established CHS.
- 2) Preparation and design of cards and maps.
- 3) Preparation and design of flyers, and a printed guide in Macedonian and English language.

The printed promotional materials will be provided to tourism stakeholders in the Municipality of Strumica and displayed at the on-site visitors’ facility.

Visitors feedback system

A printed and an online feedback system will be utilised for the needs of measuring the overall experience of visitors of the CHS, as well as to collect ideas for further improvement of the CHS and the provided services. The online version of the feedback system will be uploaded on the web portal of the CHS.

Operating hours

The official working hours of the CHS will be as follows:

Summertime (May to September)

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Closed	10:00 – 19:00	10:00 – 19:00	10:00 – 19:00	10:00 – 19:00	10:00 – 19:00	10:00 – 19:00

Wintertime (October to April)

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Closed	10:00 – 17:00					

5.3 Security plan

As part of the [Operation and Maintenance Plan \(Annex 5\)](#), the Municipality of Strumica will ensure appropriate security measures for the needs providing security of the CHS, ensuring visitors' safety, prevention of vandalism, etc.

5.4 Operational and Maintenance Plan

The part of the CHSMP related to operation and maintenance of the CHS has been developed to the sustainability, proper maintenance and operation of the tourist infrastructure/facilities and assets that will be carried out in the process of implementing the CHSMP. It provides an overview of the necessary resources (both human and financial), as well as the specific operation and maintenance activities, the specific means and deadlines for their implementation, necessary for ensuring proper operation and maintenance of the public facilities, project results and software solutions, that will be reconstructed, renovated and developed as a result of the implementation of the activities of the CHSMP.

As with the CHSMP itself, the Operation and Maintenance Plan of the CHS will be updated on a regular basis in the process of implementing the CHSMP.

The Operation and Maintenance Plan of the CHS is provided in [Annex 5](#).

6. Monitoring and evaluation

The Cultural Heritage Management Plan during the implementation of the project provides information on the key aspects of the project for the protection of cultural heritage, in particular, the effect of the project and effective mitigation measures. This information provides the recipient and the World Bank with an evaluation of the success of the mitigation as part of the monitoring and allows for the undertaking of proper actions in emerging situations. For this reason, the Cultural Heritage Management Plan identifies the monitoring objectives and determines the type of monitoring by linking with the assessed effects in the Report on the Cultural Heritage Management Plan and the measures described therein.

In particular, the monitoring part of the Cultural Heritage Management Plan provides:

- a) A specific description and technical details of the monitoring measures, including measurement parameters, methods to be used, frequency of measurement, limits of detection (where appropriate) and definition of the boundary that will signal the need for repairs;
- b) Monitoring and reporting procedures for (1) providing early detection of conditions requiring specific additional mitigation measures and (2) providing information on the effectiveness, progress and results of mitigation measures.

The Project Coordinator submits a short initial report two weeks after the beginning of the construction works. It is expected to report on the team's engagement, the location of the site, and for anything that may have an effect or to change the implementation of the mitigation and monitoring measures.

At the end of each month, the Municipality of Strumica submits to the PIU (Project Implementation Unit) a brief progress report, concentrating specifically on any problem or implementation of CHMP measures that require measures along with the expense. Submitting the report on the ESMP and CHMP will be quarterly to the UIP. In case of disagreement, the Municipality of Strumica will immediately inform the UIP.

The approved report by the contractor or the supervising expert for cultural heritage is a condition for the complete payment of the agreed fees. In order to ensure a special impact on the work of the contractor, an appropriate clause will be included in the employment contract, which will precisely state the penalties in case of non-compliance with the agreed environmental protection provisions in the form of non-payment of a certain part of the payment, and the value will depend on the severity of the breach of the contract. For extreme cases, the contract will also provide a termination clause.

Risk management plan

Construction Phase					
Activity	Expected risks/environmental impacts	Proposed Measure for Mitigation	Responsibility for Implementing Mitigation Measure	Period of Implementing Mitigation Measure	Cost associated with implementation of mitigation measure
Preparation of technical documentation	Application of the mode of protection when planning the project activities	<ul style="list-style-type: none"> - Preparation of project documentation in accordance with the positive legal regulations for protection of cultural heritage and according to the Decision n.925 from 16.09.1998 for determining the status of the monument of culture of Tsar's Towers - Approval of the project documentation from relevant institutions (National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica, Ministry of Culture - Directorate for Protection of Cultural Heritage) prior to commencement of construction works 	Municipality of Strumica, National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica	Prior to initiating a public procurement procedure	Envisaged in the budget of Municipality of Strumica
Conservation conditions	Application of the protection regime in defining the conditions	<ul style="list-style-type: none"> - Project for conservation, restoration and partial reconstruction of the ramparts and towers in the Tsar's Towers fortress in Strumica on foreseen activities on immediate protection of the project "Economic valorisation of cultural and alternative tourist offer of Tsar's Towers in tourist destination Strumica" - with tech. number 02-178 from October, 2019 - Incorporation of the conservation conditions in the project documentation and in the CHMP <ul style="list-style-type: none"> - Positive report for envisaged conservation conditions for removal of impacts and risks on cultural heritage No. 09-179/21 from 13.11.2019 after an expert control of the conservation projects was carried out by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica 	Municipality of Strumica, National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica	Prior to initiating a public procurement procedure	Envisaged in the budget of Municipality of Strumica
Conservation permit	Application of the protection regime	<ul style="list-style-type: none"> - Approved project and a conservation permit issued with UP No. 08-892 from 15.11.2019 issued by the Ministry of Culture - Directorate for Protection of Cultural Heritage - Works will be carried out under conservation and archaeological supervision 	Ministry of Culture, Directorate for Protection of Cultural Heritage	Prior to initiating a public procurement procedure	/

Cultural Heritage Site Management Plan of CHS "Tsar's Towers", ver.1, 2019

General conditions	Possible negative impacts on the authentic appearance of the Tsar's Towers if it is deviated from: - Law on Construction - Law on Cultural Heritage - Measures for protection of cultural heritage	<ul style="list-style-type: none"> - Adjustment of the appearance, color and other parameters for the object that is conserved with the existing authentic documentation. - Respect of the national regulations for protection of cultural heritage - Use of materials according to the regulations and the conservation permit - Appropriate warning signs and information boards during the construction activities - Workers need to be trained for the appropriate work - Adjustment of the object's signs with the legislation for the protection of cultural heritage - During all the activities, the conservation supervision is obligatory/mandatory in all phases of the works 	Contractor, Supervisor	During the implementation of the activities	Envisaged in the budget of Municipality of Strumica
Possibility for archeological findings	Small probability of possible damages to archaeological findings, if potential excavation occurs during construction works (The site has been thoroughly investigated in the period 2005 - 2009)	<ul style="list-style-type: none"> - Appropriate treatment in case of excavation of an archaeological find. The operations should immediately stop, and then the responsible institutions (Ministry of Culture, Directorate for Protection of Cultural Heritage, and National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica) should be informed as soon as possible (but no more than 72 hours) in accordance with the national procedures (The Law on Protection of Cultural Heritage) - The operations will start again after the approval by a responsible institution - Archeological surveillance is mandatory at all stages of work although the possibility of new archaeological findings is very small because the site has been thoroughly investigated in the period 2005 - 2009 	Contractor Supervisor	During the implementation of activities	Envisaged in the sub-project budget
All constructions work	Inadequate approach of the construction workers and other staff involved in the realization of the project activities, safety of the location	<ul style="list-style-type: none"> Provided adequate training in preservation procedures for physical cultural resources for all construction workers and other staff engaged in the project - The selected contractor should have a license A and a professional team with all the certifications and licenses for carrying out such projects 	Contractor Supervisor, Representatives from the municipal administration	During the implementation of activities	Envisaged in the sub-project budget
Preparatory works at the Cultural archeological site Tsar's Towers	Application of the protection regime	<ul style="list-style-type: none"> - No impact of the cultural heritage is expected during the preparation works at the site and the two hiking trails - The Contractor will complete the preparatory works in accordance with the project documentation 	Contractor Supervisor	During the implementation of activities	Envisaged in the sub-project budget

Cultural Heritage Site Management Plan of CHS “Tsar’s Towers”, ver.1, 2019

Conservation, restoration and reconstruction of parts of the towers and ramparts at the Cultural archeological site Tsar’s Towers: - Northern tower, north-eastern rampart and north-western rampart - Eastern rampart - South-western rampart - South portal and South-eastern tower	Possible negative impacts on the authentic look of the site Tsar’s towers if: - Deviates from the Law on Construction - Deviates from the Law on Cultural Heritage - Derogation from measures to protect cultural heritage	- All intervention will be carried out in accordance with the approved project - The materials used will be natural or similar to the original materials on the remains of the fortress walls and other objects on the site. - The stones found on the site will be re-used in the process of restoration and conservation - The stones used for reconstruction should be the same, with the same color and quality like the existing - In other case, should be from quarries with valid licenses and with approval by the conservation supervisor	Contractor Supervisor	During the implementation of activities	Envisaged in the sub-project budget
Illumination of the ramparts of the site “Tsar’s Towers”	Safety	The installation of the reflectors will be in accordance with national and international security standards in this area	Contractor Supervisor, Representatives from the municipal administration	During the implementation of activities	Envisaged in the sub-project budget
Construction of access trail and stairs with candelabras from Loven dom to North tower of the Tsar’s Towers	Possible negative impacts on cultural heritage if deeper excavation is performed than the already existing floor layer or if a new excavation is performed on a new surface	- Following the conservation conditions in accordance with Decision no. 09-179/21 from 13.11.2019 by the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica and Conservation permit UP no.08-892 from 15.11.2019 that envisage: - Not to carry out excavation deeper than forecast (no to go deeper than 0.20 m, or to use already existing floor layer) - Not to carry out excavation and ground works on new surfaces, without a prior consultation or permit from a competent authority - The installation of spotlights will be in accordance with the national and international safety standards in this area - All the activities will be carried out under constant supervision from the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica and other supervisory authorities	Contractor, Supervisor Municipal personnel	During the implementation of the activity	Envisaged in the budget of the sub-project
Rearrangement of tourist trim trail to St. Ilrijah Monastery	Application of the mode of protection	- During the urban landscaping of the tourist trim trail, no negative impact on cultural heritage is expected - The contractor needs to complete the planned works according to the project documentation	Contractor, Supervisor	During the implementation of the activity	Envisaged in the budget of the sub-project
Arrangement of mountain-bike trail to St. Ilrijah	Application of the mode of protection	- During the urban landscaping of the tourist trim trail, no negative impact on cultural heritage is expected	Contractor, Supervisor	During the implementation of the activity	Envisaged in the budget of the sub-project

Cultural Heritage Site Management Plan of CHS “Tsar’s Towers”, ver.1, 2019

		- The contractor needs to complete the planned works according to the project documentation			
Operational (post-construction) Phase					
Safety for visitors and tourists	Project for arranging and improving the access to Tsar's Towers 2020	<ul style="list-style-type: none"> - Providing safer vehicle access to the site by placing protective fences of the road Strumica – Popchevo – Tsar's towers - Providing drinking water and portable restrooms for the visitors - Consider placing additional information boards at the site - Conducting training for tourist guides in order to increase the safety of the tourists. - No visitors will be allowed to the premises until Phase IV is completed and site is safe for visitors. 	Municipality of Strumica / National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica	Envisaged	Envisaged in the budget of the Municipality of Strumica for 2020
Protection of cultural heritage	Preventing vandalism and damage to cultural heritage and infrastructure	<ul style="list-style-type: none"> - Consider increasing safety of the location by introducing additional safety measures e.g. cameras, night watch, installation of equipment or any other appropriate mean that would prevent burglary and vandalism. - Only activities that do not present the risk for existing cultural heritage will be allowed. 	Municipality of Strumica	After the implementation of the sub-project	-
Maintenance of the generated outputs	Poor maintenance	<p>Finalization of the Operational Maintenance plan of the generated outputs for periods of 7 years after the completion of the sub-project</p> <ul style="list-style-type: none"> - Operation Plan should include: • Maintenance and cleaning of the road Strumica – Popchevo; • Waste disposal; • Maintenance of the road in winter; • Maintenance and cleaning of hiking trail, snow cleaning and defrosting; • Maintenance and repairs; • Lightening; • Horticultural activities and prevention of vegetation overgrow (mowing, weeding, irrigation, etc.); • Maintenance of urban equipment and protective fences; • Cleaning toilets. 	Municipality of Strumica	After the implementation of the sub-project	-
Seismic risks	Possible damage to the site and infrastructure	The degree of mechanical resistance, stability and seismic protection of the CHS has been developed in accordance with the existing legislation in the Republic of North Macedonia	Municipality of Strumitsa	After completion of the construction activities (all phases)	-

Monitoring Plan

Construction Phase					
What Parameter is to be monitored?	Where Is the parameter to be monitored?	How Is the parameter to be monitored (what should be measured and how)?	When Is the parameter to be monitored (timing and frequency)?	By Whom Is the parameter to be monitored—(responsibility)?	How much is the cost associated with implementation of monitoring
Implementation of regulation and construction laws in the protected area and areas for cultural and historical heritage	Around and on the construction site	Documentation check Check at the construction site	At the beginning of reconstruction, restoration, conservation and construction works and During the implementation of sub-project activities	Supervisor Municipal personnel PIU - LRCP	Envisaged in the sub-project budget
Measures to protect cultural and historical heritage areas	Around and on the construction site	Documentation check Check at the construction site	Every working day during the implementation of sub-project activities	Supervisor Municipal personnel PIU - LRCP	Envisaged in the sub-project budget
All activities planned in the sub-project (1-7)	Around and on the construction site	Documentation check Check at the construction site	Every working day during the implementation of sub-project activities	Supervisor Municipal personnel PIU - LRCP	Envisaged in the sub-project budget
Implementation of measures for protection of cultural heritage defined in the mitigation plan	Around and on the construction site	Documentation check Check at the construction site	Every working day during the implementation of sub-project activities	Supervisor Municipal personnel PIU - LRCP	Envisaged in the sub-project budget
Monitoring and reporting – The Municipality of Strumica in cooperation with the National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica will monitor the activities and confirm whether they comply with project documentation and law for protection of cultural heritage. After the implementation of project activities, National Institution "Institute for Protection of Cultural Monuments and Museum" - Strumica will submit a final report for all conducted activities for protection of cultural heritage					

Annexes:

Annex 1: Conservation approval



Republic of North Macedonia
Ministry of Culture

CULTURAL HERITAGE PROTECTION OFFICE

Adm. No. 08-892
15.11.2019U
Skopje

TO

MUNICIPALITY OF STRUMICA
Str. "Sando Masev" no.1
2400 Strumica

Subject: Submission of Conservation approval

In addition to this letter, we are submitting the Conservation approval for Annex 2 of the Main project **for conservation, restoration and partial reconstruction of the ramparts in the archaeological site Tsar's Towers in Strumica** and one (1) certified project.

Respectfully,

**Director,
Aco Kostov**
(Signed manually and stamp)

Attachment: Conservation approval and one (1) certified project



Cultural Heritage
Protection Office

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Republic of North Macedonia
Ministry of Culture

CULTURAL HERITAGE PROTECTION OFFICE

Adm. No. 08-892

15.11.2019U

Skopje

THE CULTURAL HERITAGE PROTECTION OFFICE, an institution within the Ministry of Culture as a legal entity, on the basis of Article 87 from the Law on Protection of the Cultural Heritage ("Official gazette of the Republic of Macedonia" No.20/04, 71/04, 115/07, 18/11, 148/11, 23/13, 137/13, 164/13, 38/14, 44/14, 199/14, 104/15, 154/15, 39/16 and 11/18), upon the request of **the Municipality of Strumica (No. 23-36/17 from 13.11.2019)** issues,

CONSERVATION APPROVAL

**for Annex 2 of the approved project for conservation,
restoration and partial reconstruction of the ramparts
in the archaeological site Tsar's Towers in
Strumica**

1. To **the Municipality of Strumica**, a conservation approval is being issued for realization of **Annex 2 for conservation, restoration and partial reconstruction of the ramparts in the archaeological site Tsar's Towers in Strumica**, prepared by "**Univerzal gradba**" – Strumica (tech. no. 02/178 from 10.02.2019), and in accordance with the approved Main project for **conservation, restoration and partial reconstruction of the ramparts in the archaeological site Tsar's Towers in Strumica**, prepared by National Institution "Institute for protection of cultural monuments and Museum" – Strumica (12-217/1 from 07.04.2018);
2. Works from item 1 from the dispositive of this approval to be completed not longer than ten (10) years within the framework of the provided assets, in cooperation with National Institution "Institute for protection of cultural monuments and Museum" – Strumica;
3. This Conservation approval shall be terminated if the investor does not start with construction within **two (2) years** from the day when the approval under the construction regulations became effective.



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CULTURAL HERITAGE PROTECTION OFFICE

4. Works to be performed under conservation supervision of an authorized architect conservator indicated by NI Institute and Museum – Strumica;
5. Works to be performed under archaeological supervision of an authorized archaeologist indicated by NI Institute and Museum – Strumica;
6. It is indicated that in accordance with Article 87, paragraph 10 from the Law on protection of cultural heritage for works from item 1 from the dispositive of this approval, it is necessary to provide **an approval in accordance with the construction regulations**;
7. About the exact term of starting works, it is compulsory to inform **the Cultural Heritage Protection Office and NI Institute and Museum – Strumica**;
8. Conservation approval brought by the Cultural Heritage Protection Office (Adm. No. 08-917 from 08.11.2017) is null and void.

Rationale

To the Cultural Heritage Protection Office, **the Municipality of Strumica** submitted a request for receiving conservation approval for **Annex 2 of the approved project for conservation, restoration and partial reconstruction of the ramparts in the archaeological site Tsar's Towers in Strumica**.

The proposers provided evidence in addition to this request that the necessary conditions for receiving conservation approval have been fulfilled, as envisaged in Article 87 from the Law on protection of cultural heritage, as the following:

1. Annex 2 of Main project for **conservation, restoration and partial reconstruction of ramparts in the archaeological site Tsar's Towers in Strumica**, prepared by “**Univerzal gradba**” – Strumica (tech.no. 02/178 from 10.2019), and in accordance with the approved Main project for **conservation, restoration and partial reconstruction of ramparts in the archaeological site Tsar's Towers in Strumica**, prepared by National Institution “Institute for protection of cultural monuments and Museum” – Strumica (12-217/1 from 07.04.2018);



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2. **Positive report (No. 09-179/21 from 13.11.2019)** from a performed expert control on a conservation project by a commission appointed by **NI Institute and Museum – Strumica** with Decision No.09-179/20 from 12.11.2019.
3. Elaborate for geodetic mechanical research and testing on a part of the terrain at the fortress Tsar's Towers – Strumica by the Faculty of Civil Engineering Skopje (No. 12-10/490-2 from 30.09.2019);
4. Opinion by the IEEES for the projected degree of mechanical resistance, stability and seismic protection of the building (No. 0807-2086/3 from 07.11.2019);
5. Completed audit report for Annex 2 of Main project for conservation, restoration and partial reconstruction of the ramparts in the archaeological site Tsar's Towers in Strumica by “Inkom Inzhenering”, LTD, Skopje (23/19 from 10.2019);
6. Report by a completed conservation supervision of performing immediate protection works, conservation, restoration and partial reconstruction of the fortress “Tsar’s Towers” – Strumica, phase 2 within the framework of the international project for cross-border cooperation between the Municipality of Strumica and the Municipality of Kilkis – R. Greece prepared by the authorized architect conservator Aleksandar Cicimov (No. 03-547/1 from 29.10.2017).
7. Completed report for performed conservation-construction interventions on a part of the fortress Tsar’s Towers in Strumica in the period of 2014-2015 by CPTS “Univerzal Gradba”, Strumica (tech. No. 07/25-1 from 24.03.2019)

After studying the documents attached to the request, the Cultural Heritage Protection Office stated that the request is justified and the conditions in accordance with Article 87 from the Law on protection of cultural heritage and Article 3 from the Rulebook for conservation projects are fulfilled.

The Office in terms of cultural heritage, this approval is issued in accordance with the **Positive Report (no. 09-179/21 from 13.11.2019)** from a performed expert control of conservational project by a commission appointed by **NI Institute and Museum – Strumica** with Decision no.09-179/20 from 12.11.2019, Opinion by IEEES about the projected degree of mechanical resistance, stability and seismic protection of the building (no. 0807-2086/3 from 07.11.2019), as well as Completed audit Report for Annex 2 of Main project for conservation,





Republic of North Macedonia
Ministry of Culture

CULTURAL HERITAGE PROTECTION OFFICE

restoration and partial reconstruction of the ramparts in the archaeological site Tsar's Towers in Strumica by "Inkom Inzhenering", LTD, Skopje (23/19 from 10.2019). On the basis of the above-mentioned documents, the project decision is in accordance with the physical condition and the values of the protected wealth and works may be performed according to the attached project.

Due to the above, it has been decided as in the approval dispositive.

LEGAL MORAL: Against this act, a complaint may be filed within 15 days to the State Commission for Decision-making in Administrative Procedure and Second Instance Employment Procedure.

Director,
Aco Kostov
(signed manually and stamp)

Prepared by: B. Kuzmanoska (signed)
Prepared by/approved by: Master of Arts B. Jovanovska (signed)

Delivered to:

- Municipality of Strumica
- NI Institute and Museum – Strumica
- Archive
- File
- Inspection Department

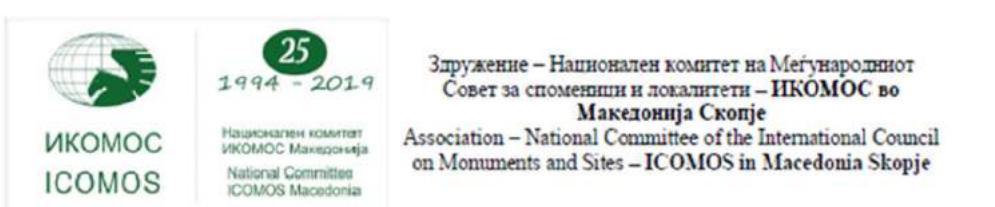


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Annex 2: ICOMOS Expert opinion



No. 03-0302/1-1

Date: 14.01.2020

Dr. Kosta JANEVSKI

Mayor – Municipality of Strumica
Strumica

Subject: Expert opinion on the project: "Conservation, restoration and partial reconstruction of the ramparts of the fortress – Tsar's Towers – in Strumica"

Dear Dr. Janevski,

On the basis of the submitted request, by Your side, for expert opinion by the National Committee – ICOMOS Macedonia about the project: "Conservation, restoration and partial reconstruction of the ramparts of the fortress – Tsar's Towers – in Strumica", approved by the NI Institute and Museum – Strumica, it is our duty and pleasure to inform you that:

- The specified project has been prepared on a highly professional level meeting all standards, for the proper treatment of immovable cultural heritage, both on a national and at the level of ICOMOS recommendations, especially by respecting the authenticity of the object and applying adequate methods and materials for conservation, restoration and reconstruction of immovable cultural heritage (with a maximum use of the authentic and traditional material - lime mortar);
- Properly foreseen phased implementation of the project, due to the inability to provide the necessary financial assets for a complete implementation of the project;
- Properly defined priority for implementation of the phases;

The National Committee – ICOMOS Macedonia, salutes the efforts by the local self-government of Strumica, the Government of RNM, the European Union and the World Bank bodies, to financially support the complete implementation of the proposed project, as proof for the increased care about the immovable cultural heritage on a national and regional level.

Respectfully,

Dr. Lazar Shumanov
President

Delivered to:

- Archive
- File

Nacionalen komitet IKOMOS Makedonija, Skopje P.Fab 816 Ul. Polkriena "sar(j)a" 37 B, lokal 13 1000 Skopje, MAKEDONIJA Tel/faks: (02) 3215 435 e-mail: icomosmk@mt.net.mk www.icomos.org.mk	National Committee ICOMOS Macedonia, Skopje P.O. Box 816 ul. "Pokriena Carsija" 37B, Local 13 1000 Skopje, MACEDONIA tel/fax: +389 2 3215 435 e-mail: icomosmk@mt.net.mk www.icomos.org.mk
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Annex 3: Project for arranging and improving access to Tsar's Towers



Проектна програма за Уредување и подобрување на пристапноста на Цареви Кули 2020

Име на проектна програма: Уредување и подобрување на пристапноста на Цареви Кули Струмица- 2020

Носител: Национална Установа за заштита на споменици на култура Завод и Музеј Струмица

Партнер: Општина Струмица

Период на реализација: 01.01.2020- 30.10.2020

Cultural Heritage Site Management Plan of CHS “Tsar’s Towers”, ver.1, 2019

Annex 4: Time plan for implementation of Phase III and Phase IV of the CHSMP of Tsar's Towers in Strumica

Annex 5: Operation and maintenance plan of the CHS



Operation and maintenance plan

Tsar’s Towers Cultural Heritage Site

Annex 5 to Cultural Heritage Site Management Plan of Tsar’s Towers

Annex 6: Visitors Management Site Plan

