



**INFORMATION on the progress of the Coastal Area
Management Programme Montenegro (CAMP MNE)
in the context of preparation of the Coastal Area Spatial Plan of Montenegro (CASP)
and
of the National Strategy for Integrated Coastal Zone Management of Montenegro
(NS ICZM MNE)**

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1. Introduction

Integrated coastal zone management (ICZM) encompasses an integrated approach to managing coastal processes in order to ensure sustainable development. Emergence of the concept is linked to the UN Conference on Environment and Development held in Rio de Janeiro in 1992, i.e. to the Agenda 21. ICZM can be defined as a dynamic, multidisciplinary and iterative process that promotes and enables sustainable management of the coastal zone. The intent of integrated management is to balance longer term environmental, economic, social, cultural and other goals within the limits set by natural environment. In the ICZM concept, the word “**integrated**” refers to **comprehensive formulation of goals and integration of instruments needed to fulfil these goals** as well as to **integration of all relevant policies, sectors and levels of administration/ governance**. It also denotes **integration of land and marine parts of the coastal zone**. A very important ICZM aspect that should not be neglected refers to “**governance**” itself,, i.e. to the **development and application of appropriate governance mechanisms**.

Montenegro has signed the **Protocol on Integrated Coastal Zone Management in the Mediterranean (ICZM Protocol)** in 2008 in Madrid and has ratified it by passing the **Law on Ratification at the end of 2011**. The ICZM Protocol has thus become a constituent part of the national legal system. In line with the definition of coastal zones from the ICZM Protocol, the Montenegrin coastal zone covers **a surface of 1,591 km²**, i.e. the territory of the six coastal municipalities within their administrative boundaries **on land**, as well as **territorial sea and internal waters with the total surface of some 2,450 km²**.

The EU coastal zone policy has evolved from global processes and the need to address problems faced by many European countries when it comes to degradation and depletion of natural, socio-economic and cultural resources in these areas. For these reasons, the European Parliament and Council adopted the **ICZM Recommendation** in 2002, defining planning and management principles for coastal zones. The Recommendation is complementary with requirements of the ICZM Protocol, which was **ratified by the European Union** in September 2010. Following the ratification, the EU has initiated preparation of a new Directive that has ICZM at its core. The EU has also passed new instruments and horizontal policies. For example, **Marine Strategy Framework Directive (2008)** was adopted, as well as **Integrated Maritime Policy (2008)** that aims to provide for a more coherent approach to maritime issues with stronger co-ordination between different areas.

2. Importance of the Coastal Area Management Programme Montenegro (CAMP MNE) for sustainable development of the coastal zone of Montenegro

Having in mind obligations stemming from the ICZM Protocol implementation, as well as those linked to harmonisation of the national legal and institutional framework with the aforementioned EU policies and legislation, the **Contract** number 01-500/31 of 1 June 2011 has been concluded between the Government of Montenegro as the Party to the Barcelona Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean (Barcelona Convention) and the United Nations Environment Programme (UNEP) as the Barcelona Convention Secretariat. The Contract regulates implementation of the **Coastal Area Management Programme Montenegro (CAMP MNE)**.

In parallel with implementation of the CAMP MNE process and based on the **Report on Spatial Arrangement from 2010**, the preparation of the **Special Purpose Spatial Plan for the Coastal**

Zone of Montenegro (SPSPCZ MNE) has been initiated. SPSPCZ MNE is a regional plan covering the entire coastal zone, which, among other objectives, has the aim to assess the existing capacities and the level of their sustainability. Terms of Reference for the SPSPCZ MNE define that the Plan should be **developed in line with the goals of integrated coastal zone management**. In such a context, the two years of the so far implementation of the CAMP MNE have been dedicated to preparation of expert inputs. Integration **of these inputs** into spatial planning solutions should provide for a more sustainable use of space in the Montenegrin coastal zone in the future compared to the trends observed so far, which would contribute to sustainability and recognition of the country as a tourist destination. At the same time, sustainable planning solutions are a precondition for efficient implementation of the **National Strategy for Integrated Management of the Coastal Zone of Montenegro (NS ICZM MNE)** in line with international obligations agreed to at ratification of the ICZM Protocol.

In line with the Contract's provisions and taking into account the EU Integrated Maritime Policy, a programme of implementation of the CAMP MNE has been prepared in order to define conditions for protection and use of the key coastal resources as baselines for planning and for determining capacities for economic development of the coastal zone. To this end, a methodology has been developed (and applied) to assess **vulnerability and suitability of the coastal system** in Montenegro through recognition of important natural, ecological, landscape, cultural and social values and spatial potential.

Analytical foundation of this methodology includes: the assessment of general vulnerability of the coastal zone of Montenegro; a detailed vulnerability assessment for the narrow coastal belt; the assessment of the coastal zone's attractiveness for agriculture development; the analysis of land uses in the coastal zone, as well as the preparation of targeted sectoral studies having vulnerability assessments as their starting points (i.e. a biodiversity and nature protection study; studies on hydrology, geology and water quantity and quality; a study on the assessment of anthropogenic impacts on the environment and human health; and the analysis of natural hazards and coastal processes). Alongside with analyses of the existing state, processes of transformation of the coastal zone are studied in detail. This is primarily done through a targeted analysis of socio-economic processes and development, especially for agriculture and tourism (including the methodology for carrying capacity assessment for tourism), as well as through the analysis of institutional and legal conditions (which represent a starting point for the application of ICZM) and of the key sources of pressures. Through these analyses, expert baselines were prepared for:

1. **Development of criteria and guidelines for determining land uses**, primarily for the needs of the **SPSPCZ MNE**; this was done in a way as to direct land-use categories intended for performance of basic functions (zones planned for development and arrangement, i.e. construction areas) to the least vulnerable parts of space.
2. **Elaboration of the key instruments**: instruments for integration and participation, land-use and fiscal policies instruments, as well as those serving to monitor and evaluate progress, **to identify and guide changes in the coastal zone in a desirable direction** (not only in spatial but in the widest sense) **through the development of the NS ICZM MNE** and its concretisation through elaboration of the governance structure, objectives and indicators, as well as through an action plan for its implementation.

3. The most significant results of the Coastal Area Management Programme Montenegro (CAMP MNE) so far for the preparation of the SPSPCZ MNE

3.1. Vulnerability of the coastal zone of Montenegro

Vulnerability assessment of a given space is based on identification of possible impacts of specific activities or interventions and on determining possible scope of such impacts on the quality of environmental segments. Such an assessment enables to determine sections of space where planning of certain activities or interventions is less suitable or unsuitable. The degree of acceptability of spatial interventions is lower where the existing qualities are greater, i.e. where vulnerability is higher.

Assessment of general vulnerability within the CAMP MNE was conducted based on vulnerability of individual environmental segments whereas **the degree of spatial vulnerability derived through the assessment does not depend on potential impacts of specific activities or interventions but on (individual) characteristics, i.e. on the value of space.** The level to which specific environmental segments have been **polluted (endangered)** was also assessed as a specific characteristic; results of this analysis served as one of the baselines for determining vulnerability and for defining remediation measures.

Results of the vulnerability assessment clearly show exceptional vulnerability of the environment in the coastal zone of Montenegro where **2/3 of the area are highly vulnerable.** According to the size of highly vulnerable areas, Bar and Ulcinj zone (Ulcinjско and Anamalsko fields, area along Bojana River) stands out. As for the share of highly vulnerable areas in the municipal territory, this ratio is the highest in Budva (refers to natural preserved sections of hinterland and coast). Tables 1 and 2 in the Annex provide an overview of surfaces of highly vulnerable areas and their share in the municipal territories within the belt of 1.000 m from the coast line. Pressures are exceptionally high for tourism settlements, beaches and purely housing areas in Kotor, Budva, Bar and Ulcinj, as well as for the quality of the sea in Boka Kotorska and for the narrow coastal section, especially in the shallow water area in front of Ulcinjska beach and Budvanska Riviera. Assessment has shown that the share of highly vulnerable areas is lower within the 1000 m belt than on the level of entire coastal zone/ whole municipalities, which testifies of **well-preserved natural hinterland and pronounced urbanisation i.e. degradation of the narrow coastal belt.** A small share of highly vulnerable areas in the narrow coastal belt, nearby the shoreline, indicates it is necessary to protect them more intensively and efficiently.

A comprehensive assessment of the coastal zone's state prepared in this way, encompassing natural and anthropogenic factors, pressures and risks, was then translated into spatially applicable concept offering a possibility to analyse in detail spatial planning aspects of any part of the coastal zone of Montenegro and enabling **optimal decisions on planned land uses** of the space in question. This form of optimising planned land uses **based on vulnerability assessment** is achieved in two ways: a) by **guiding future siting decisions** within land-use plan of the SPSPCZ MNE; and b) by **re-examining the existing siting decisions**, i.e. spatial planning solutions from currently valid spatial plans in the six coastal municipalities.

Based on vulnerability assessment, **criteria and indicators on the state of spatial arrangement are defined** and they contribute to transparency in formulating alternatives for spatial planning solutions. At the same time, a GIS application enables more rational, objective and substantially faster elaboration of alternatives in line with selected spatial planning criteria.

3.2. Planning and use of the coastal zone space

The analysis of spatial plans that are currently in force and of the level of actual development (the extent to which the land is built-up) based on orthophotos from 2011 (Table 3) showed that

much oversized construction areas have been designated in relation to population numbers and tourist capacities. **Share of construction areas in the total surface of six coastal municipalities in Montenegro is 15.5%**, while the same ratio for the coastal counties in Croatia (that have similar population density) ranges from 4.0% (Dubrovačko-neretvanska County) to 7.1% (Splitsko-dalmatinska County). Pressures are especially pronounced for the narrow coastal area with **as much as 46% of the surface of 1 km wide coastal belt designated for construction**. At the same time, Mediterranean countries such as Italy, France and Spain have lower percentages for planned levels of built-up areas (on average around 30%) while having substantially higher population density. A consequence of oversized construction areas is **low extent to which they have been built-up, i.e. used**. Total surface of construction areas in the six coastal municipalities is 23,363 ha, while only 4,321 ha or **18,5%** have been developed so far. The same ratio in, for example, coastal counties in Croatia ranges from 51.8% (Istarska County) to 77.9% (Primorsko-goranska County). A similar situation (based on available data for some municipalities) is found in Slovenia where share of construction areas in municipal territories varies from 1.96% (Loški potok Municipality) to 28.29% (Ljubljana city Municipality) depending on geographical and social characteristics. The extent to which construction areas are used varies from 33.0% (Pivka Municipality) to 79.5% (Ljubljana city Municipality).

Low extent to which construction areas have been utilised means that there are large reserves within them. Total **surface of non-developed construction areas is 19,042 ha**. Out of this number, some **13,000 ha refers to mixed purpose settlements areas**, which means that **additional 600 – 800,000 people could live within the existing construction areas** (assuming population density of 45 – 60 inhabitants per hectare). Reserves in the **zones designated for tourism and tourist apartments are around 4,600 ha** which enables, with supposed minimum density of 60 beds per hectare, development of new capacities of around **270,000 additional beds**. **If a more frequently applied standard of 80 beds per hectare is taken into account, development of new capacities with some 350,000 beds would be possible**. If reserves in construction areas are recalculated into new apartments taking into account present population density, a total of **532,000 additional flats could be built within the existing construction areas whereas some 213,000 of new flats would be for permanent housing**.

Planning of construction areas that several times exceed the needs represents irrational use of valuable and non-renewable spatial resources and has numerous negative consequences including: dispersed construction which requires considerably longer transport infrastructure and **several times more expensive infrastructure arrangements for construction land, unnecessary depletion of valuable resources**, especially of valuable agricultural and forest land, **higher energy and fuel costs**, i.e. stronger pressure on the environment, **loss of traditional physiognomy of settlements** and disturbance of original landscape values, and, in economic sense and in the long run, **lower revenues from tourism and decline in the destination's rating**.

3.3 Assessments of the coastal zone's attractiveness and suitability for agriculture development

Areas suitable for individual activities cannot be determined based on the vulnerability assessment alone. Instead, it is necessary to perform valuation of space in relation to development goals by conducting an **assessment of attractiveness** within the planning process, i.e. to look for parts of space that require lower costs and investments, where development and maintenance is easier and more efficient. After that, it is necessary to perform comparison and alignment of protection and development goals within **suitability assessment** by looking for more attractive and less vulnerable parts of space. In addition to preservation and improvement of the quality of environment, protection goals include preservation of the quality of landscapes.

In line with spatial dimension of the coastal zone and by taking into account specific cultivation patterns for certain varieties, tradition and market requirements, assessment of attractiveness and suitability has been done for agriculture with a focus on three key sectors: **olive growing, production of citruses and vine**, as they are important not only for the coastal zone but also for economic development on the national level. The purpose of the attractiveness assessment for agriculture was to determine parts of space where it would be justified to maintain the existing surfaces in the long run as well as those where it would be most efficient to set up new surfaces of the most significant agricultural varieties for the coastal zone. Analysis shows that the **total surface of suitable agricultural land is around 44,630 ha**, whereas **land surfaces** that are at the same time **highly suitable for all the analysed varieties** (olives, citruses and grapes) make some **21,187 ha and the total surface of optimal, i.e. priority areas** is around **18,834 ha**. Moreover, it was concluded that the biggest opportunities are linked to flat areas of coastal fields with alluvial-colluvial soils located in the area from Herceg Novi to Ulcinj (total of **8,300 ha**).

These fields represent areas with potential for development of more **intensive agriculture** as they offer opportunities for a range of agricultural subsectors – from intensive production of vegetables, to multi-annual plantations (of citruses, vine, olives and other kinds of fruits) and production of feed for different types of farmed animals. These are areas where irrigation is possible which additionally increases agricultural potential. At the same time, these larger flat areas are the ones where pressures from other sectors and risks to permanently lose potential for agriculture due to land-use changes are the highest. In addition to these areas with potential for more intensive agriculture, **areas with lower potential for agriculture development** or with certain natural restrictions are also significant. They are mainly located in border areas of the coastal fields, on terraces and small plateaus on flysch or karst terrain. Such larger areas are found in the region between Bar and Ulcinj (Velje selo and surrounding fields, Mala and Velika Gorana, Pečurice) as well as in the zones of Grbalj (Zagora, Krimovica, Kovači, Bigova) and Luštica (Klinici and surroundings, Gošići, Radovanići, Merdari). These areas are also specific due to traditional organisation of space for living and agriculture. Regardless of somewhat more difficult cultivating conditions, agriculture is still important in these areas but it also overlaps with other activities, i.e. land uses. By the means of attractiveness and suitability assessment, **special agricultural areas** have been identified. These are recognisable and specific in a sense that they are important for preservation of entire cultural heritage and landscape characteristics due to the very fact that they have emerged as a result of application of traditional practices in cultivating and maintaining agricultural surfaces (arranged olive groves, terraced surfaces and similar).

3.4. Areas of conflicts between non-developed parts of construction areas and areas of the highest vulnerability

Based on a comparative analysis of the areas with high vulnerability, existing planned land uses and existing level to which the areas have been built-up, **35 areas of conflicts** between non-developed construction areas and areas of the highest vulnerability have been singled out. Illustration 1 in the Annex shows selected areas of conflicts between non-developed construction areas and areas of the highest vulnerability having a surface of more than 50 ha. For these zones, it is suggested that a decrease of construction areas should be considered where their scope overlaps with highly vulnerable areas. Total **surface of conflict areas** is **6,246 ha**. Given the fact that the total surface of non-built construction areas is 19,042 ha, it can be concluded that around 33% of non-developed construction areas is in conflict with the areas of high and very high vulnerability. Details on the scope of conflict zones are provided in Table 4 in the Annex. For 15 areas where conflicts have been identified based on the highest vulnerability, land uses are at the same time not aligned from the aspect of potential to develop agriculture (these areas are shown on Illustration 2 in the Annex). **If construction was carried out in all the conflict areas mentioned above, some 4,700 ha of the**

existing agricultural land and land potentially suitable for agriculture would be lost! The so far practice in defining areas for settlements in a way as to include large ranges of surrounding agricultural surfaces inevitably leads to fragmentation of agricultural land and dispersed construction.

3.5. Coastal setback

Article 8 of the ICZM Protocol defines specific measures and criteria for protection and sustainable use of the coastal area, including determination of the **setback line** at a distance of at least **100 metres** from the seashore. The space between the seashore and the setback line comprises a **setback zone where construction is not allowed**.

In line with requirements of the ICZM Protocol, this setback might be insufficient for parts of the coast which are low and prone to erosion, exposed to risks from sea level rise or have significant ecological values. That is why the additional vulnerability assessment was done for the narrow coastal zone, aiming to identify zones where conditions for **expansion of the coastal setback** exist. The Protocol also allows for the **adaptation (exceptions)** of the coastal setback (to **less than 100 m**) for areas with special geographical and other restrictions, as well as for projects of public interest which must be identified in a national legal act and guided by the principles and goals of the Protocol.

The narrow coastal belt and the coastal setback zone always represent areas of special value for the physical structure of settlements and criteria of public interest and public needs must have priority in designing urban solutions for these areas. **Good practices show that the best solutions are usually the ones that leave public surfaces next to the shoreline to be primarily used for leisure and with open access for all inhabitants.**

In order to ensure as objective and consistent definition of the setback as possible, with conditions for its adaptation or expansion, criteria have been elaborated including: **anthropogenic criteria** comprising land uses planned under the existing spatial planning documents and the level to which the areas have been developed; and **criteria resulting from natural and physical characteristics of the coastal area** expressed through a unique vulnerability grade ranging from 1 to 4. Based on these criteria, a matrix has been proposed for consistent approach to various typical situations (Table 5). Based on data from Tables 5 and 6 from the Annex, it is apparent that **setback cannot** be applied to **50.8% of the coastline** due to existing structures and acquired (inherited) rights. It is important to have in mind that the signed state contracts do not determine scope of their spatial application precisely, meaning the space they refer to is not always equivalent with surfaces from adopted planning documents which usually cover just a part of space to which the contracts refer. Due to this fact, share of category “no setback due to acquired rights – state contracts, DSL, LSL and UP” currently referring to 21.6% of the coastline might be subject to change as spatial implications of implementing state contracts will be considered in detail. **Adaptation (decrease) of setback** is possible for **15.7% of the coastline**. The remaining part, i.e. **33.5%** or 80,444 m **of the coastline** comprises parts of the coastal zone where **setback should be applied**. **Major share** of this category – **22.3%** of the coastline or 54,193 m – refers to **zones outside construction areas** which have not been planned for development anyway. **Within construction areas, “no adaptation” category was proposed for just 4.4%** or 10,050 m of the coastline comprising areas of moderate, higher and high vulnerability, while **conditions for setback expansion exist for 6.7% of the coastline’s length**. According to results from the assessment of vulnerability in the narrow coastal zone, conditions for expansion of the setback (to more than 100 m) exist for the following locations: mouths of Sutorina and Morinjska rivers, Tivat Saltpans, Buljarica, Long beach (Velika plaža) and Ada Bojana. For some of the listed locations where conditions for expanding the coastal setback exist yet public interest for investments in tourism development will override aspirations to protect and use their natural values sustainably, investments should be carried out by applying optimal planning and

urban development approaches that will take into account sensitivity/ vulnerability of space in order to ultimately also ensure safety of construction.

In line with provisions of the ICZM Protocol, all the situations where adaptation will be applied need to be documented and the purpose and justification of each specific adaptation need to be elaborated in line with the national legal act that will regulate the matter. It is important to understand that **setback in large planned tourist zones does not represent an obstacle for investments.** Serious tourism projects of higher standard actually need free setback zone for arrangement of public, green, recreational, beach and other amenities, whereas it is quite common to develop accommodation segments behind the setback line. As a rule, it is the real estate projects for temporary residing (apartments, villas) that have a problem with the setback. A criticism of setback is thus a good indication of investors' intentions – whether they are interested in actual development of commercial tourism or in real estate business. **It should be also emphasised that principle of sustainable coastal planning means locating the zones for temporary housing within or besides settlements; by no means should they be sited in precious detached areas with temporary housing being an exclusive land use.**

3.6 Rural areas

Integration of valuable parts of the coast (where setback adaptation is not recommended) with neighbouring spaces in the hinterland is an important aspect for sustainable development of the coastal zone of Montenegro. Due to landscape and nature qualities, these areas should remain in their natural state and become a part of **open spaces where intensive urbanisation is not planned.** The areas in question predominately have rural characteristics and their **future development would be mainly linked to the existing traditional settlements or to activities on agricultural estates and agricultural produce processing.** Parts of the system of open spaces are also **areas with fertile soil and valuable traditional cultural landscape.** Their preservation is a basis for **multifunctional rural development** where agricultural production is combined with tourism offer (agro tourism) and different types of open space recreation. Rural development has a strong support from EU funds in the pre-accession process as it links in an ideal manner interests of local communities, creates new jobs, preserves and promotes autochthonous cultural and historic values and is at the same time environmentally friendly. Financial allocation for Montenegro through IPA component V intended for rural development (IPARD) for 2012 and 2013 was around € 11 million. These funds will grow in the coming period, and following the accession to the EU, they will be many times higher. Croatian example is illustrative to this end: the country used between € 26 and 28 million from IPARD annually, and following its accession to the EU, more than € 300 million became available annually from the European Agricultural Fund for Rural Development (EAFRD). Development of absorption capacities for using these funds is a long lasting process. That is why it is important to create preconditions for their efficient utilisation, via, among other things, spatial planning documents. The fact that there is at least 10,000 ha of uncultivated cultivable land and more than 10,000 people on official unemployment record in the coastal region speaks of the potential for rural development and so does the data on imports of agricultural products where around € 3 million is spent annually just for imports of olive oil and citrus.

One of the current development problems is that the main share of economic development opportunities in the coastal zone of Montenegro is linked to tourism and especially to real estate business (secondary housing) within the narrow coastal belt. **An important task for the SPSP CZ MNE is to recognise other development opportunities that open possibilities for development of diversified economy in the coastal zone. Potential of rural, open spaces and resources they have is one such development opportunity.** Through a consistent analysis of previously presented results from CAMP MNE, i.e. based on valuation of landscapes and a suitability assessment (which included results from vulnerability assessment) **areas especially suitable for agriculture, areas with**

exceptional landscape values, protected areas (existing without national parks and potential without regional parks of nature) and forests valuable on ecosystem grounds have been singled out. **Surface of open rural areas** identified in this way is around **40,000** ha which makes 26.5% of the total territory of coastal municipalities (150,000 ha). Some 8,000 ha overlaps with construction areas representing zones of potential conflicts that need to be resolved through spatial planning documents, especially through SPSP CZ MNE, by introducing measures for optimisation of land uses. When the scope of the optimisation zones was being determined, areas of conflicts between undeveloped construction land (with a surface of more than 50 ha) and the areas of highest vulnerability, comprising also areas of conflicts from the aspect of agriculture development potential, have been taken into account. The approach was to include areas of conflicts from the aspect of agriculture within the scope of proposed open spaces where land use optimisation was recommended. Other conflicting areas need to be managed by defining land use conditions based on the guidelines provided for each area in the framework of vulnerability assessment for the coastal zone of Montenegro. **Optimisation of land uses (Illustration 3) for predominantly rural areas needs to be achieved by:**

- defining specific conditions for spatial arrangements in order to preserve rural values, **decreasing or revoking dispersed and unrealistically planned construction areas while respecting rights acquired** through adopted spatial planning documents and contractual obligations (state contracts, national and local location studies, detailed urban plans, urban projects);
- increasing the level of efficiency in carrying out the investments in detached zones outside settlements by applying **instruments that limit investor's rights based on adopted spatial planning documentation** to a certain time frame (for example, 3 years). After this period expires, the zone in question would lose construction area status if implementation of investment had not started (it would be possible to introduce **simulative measure** that would allow expansion of this deadline if capacities for temporary housing would be replaced with hotel capacities within mixed-use resorts in the respective plans).

According to completed analyses, **there is a realistic potential for some 2,000 new jobs and annual revenues of around € 50 million (with € 12 million linked just to rural tourism) solely in the sectors of ecological and traditional agriculture, rural and adventure tourism, and supporting services sector.** If this potential was used, **employment in the coastal region would increase for around 4%** while **contribution to GDP growth** was estimated to **3 – 4%**. It is especially important to enable use of available pre-accession funds (IPARD) for a major part of this component of rural development (diversified rural economy). The mentioned projections include agricultural production and tourist capacities of primarily family type (importance of this segment of rural economy has been also recognised by the United Nations which have declared 2014 the year of family agricultural holdings) and do not include intensive agricultural production in the fields such as Anamalsko, Ulcinjsko, Zoganjsko, Tivatsko, Barsko, Mrčevo and others. It should be also emphasised that only a tourist region with developed traditional rural offer can provide for autochthonous events and experiences (gastronomic, oenological, cultural, educational, adventurous, etc.) expected by modern tourists. Rural areas and rural economy are thus not just a value in itself but also an important part of the attractiveness basis and an important segment of high-quality tourism offer at the coast.

Renewal of the spatial planning documentation and above-mentioned supporting spatial planning measures alone cannot resolve the problem of pressures on the coastal space and provide for preservation of its natural and landscape values as well as for preservation of long-term economic potential for development of quality tourism and rural development. It is therefore **necessary to also plan complementary measures of land and fiscal policy** to regulate and direct spatial development. In this sense, **general tax on real estate** is particularly important (the accent is on higher taxation for

construction areas) as is **tax on non-built (undeveloped) construction land** that can have a progressive rate until the taxed land is brought to a planned purpose. Introduction of **tax on capital profits** could be also considered to capture extra profits from converting other land uses into construction land (projects of public interest could be exempted from its application) or introduction of **tax on changing the use of agricultural land** that has a similar purpose but is mainly used to provide incentives for rural and agriculture development. These land and fiscal policy instruments are delicate and should be thoroughly elaborated while all the effects of their application which are wider than those referring to management of spatial development should be simulated.

3.7 Concluding deliberations

Results of the analyses conducted within the CAMP MNE as well as findings presented in the Report on Spatial Arrangement from 2010 indicate that it is necessary to **optimise land uses in the coastal zone by decreasing the scope of construction areas**. If the SPSP CZ MNE confirms all the areas planned for construction in the coastal zone as designated under valid spatial plans, i.e. if it confirms construction areas expanding over 46% of the surface of 1 km wide belt, **planned construction in the period of 16 years up to 2030 would more than double all the capacities that were built so far by all previous generations and all investors until nowadays** (14% of the 1 km belt have been developed by now). It is more than obvious that **such a plan is neither sustainable nor realistically implementable**. Planned level to which the area is to be built up is exceptionally high even when compared to several times more densely populated coasts of Spain, France and Italy. On the other hand, natural, non-developed coast and adjacent spaces represent an important attractiveness basis for tourism and overall development of the coastal zone of Montenegro.

Planning of construction land is regulated by the **Article 77 of the Rulebook** on More Precise Content and Form of the Planning Document, Criteria for Land Use Planning, Elements of Urban Regulation and Unique Graphic Symbols, which also requires decrease of construction areas if the **existing level to which they are built up is lower than 50%**.

In a situation where decrease of construction areas is mandatory the issue of criteria for selecting the zones or parts of the zones where annulation of construction area status should be proposed arises. While respecting other criteria, in particular inherited rights in a situation where detailed planning documents are being developed for a certain zone (with known investors), general vulnerability assessment might be particularly useful. This assessment showed that **80% of undeveloped parts of all the construction areas is on locations with high (grade 4) and very high (grade 5) vulnerability**. Areas of Herceg Novi, Budva and Ulcinj municipalities merit special attention. Despite the fact that the values of vulnerable surfaces and shares of highly vulnerable surfaces in total territories in other municipalities are somewhat lower compared to the three mentioned above, it can be said that they are still high.

Irrational **expansion of construction areas** is frequently conducted **by changing the use of agricultural land**. Such practice is harmful not only for agriculture but can cause other negative consequences such as soil erosion, environmental pollution, destruction of cultural heritage and lowering of the overall attractiveness of certain areas. In relation to the attainment of one of the basic objectives of sustainable development that refers to preservation of agricultural land as a natural resource, conflict caused by changing the use of agricultural land requires a responsible approach in planning urbanisation at municipal and regional level. Such an approach requires consistent restrictions to expansion of existing settlements and dispersed construction, including a decrease of construction areas and their redirecting to the zones within urbanised units.

One of the key instruments of the ICZM Protocol is the **instrument of coastal setback**. However, **intention of prescribing the coastal setback is not to prevent further development of valuable traditional coastal settlements** in line with rules that guided emergence of their physical

structures in the first place. A good example are numerous settlements along the coasts of Bokokotorski Bay where steep shores and narrow coastal belt conditioned a matrix of coastal settlements that have necessarily developed along the coastline. Insisting on strict observation of the coastal setback in such situations is not justified and the ICZM Protocol recognizes such situations and envisages a possibility of adapting the setback to address them. It is also important to mention that application of the coastal setback is not automatic – instead it has to result from careful consideration of natural conditions of space while respecting guaranteed ownership relations as well as important urban and social conditions.

Related to this, application of the coastal setback should not be distinguished from good spatial planning practices as the principles that motivated introduction of the setback are the same ones that make the basis of spatial and urban planning. For the same reason, an optimal solution would be to resolve **the issue of coastal setback** according to the ICZM Protocol in the same process used to **redefine construction areas of settlements** (including determination of **open spaces**) in line with obligations from Article 77 of the Rulebook, i.e. in line with findings of analyses conducted in the framework of SPSP CZ MNE preparation and CAMP activities.

4. Key recommendations for preparation of the SPSP CZ

The key findings from the process of CAMP MNE implementation have been derived in a way as to **find their full application in the SPSP CZ MNE**, primarily **through definition of the main land uses** (forest and agricultural areas), **determination of zones with limited construction** (through setback application and identification of wider zones that should be preserved from future development) and **establishment of conditions for bringing planned land uses to their purpose**. The following can be singled out as the **key recommendations**:

- Agricultural land and forests, especially in areas with valuable landscapes, are the key resources of rural areas that have their **own economic potential**, particularly through ecological and autochthonous production and diversification with different forms of tourism. They are also an **important part of the attractiveness basis and a segment of high quality tourism offer on the coast**.
- In order to preserve natural and landscape values of the coastal zone of Montenegro **in the function of further improvements in positioning the tourist destination** on the global market and **stimulating rural development concept to diversify tourism offer**, it is necessary to end the so far practice of fragmentation of agricultural surfaces and permanent destruction of valuable coastal forests by controlling the expansion of existing settlements and halting of dispersed construction, including decreases of construction areas and construction channelling to inside the urbanised entities.
- In line with provisions of the Rulebook on More Precise Content and Form of the Planning Document, Criteria for Land Use Planning, Elements of Urban Regulation and Unique Graphic Symbols (which is currently in force) and determined areas of the highest conflicts between natural vulnerability of space and non-built construction areas, the **process of revising, i.e. decreasing construction areas in these zones should be considered**.
- Every new expansion of construction areas should be conditioned by their decrease at other similar locations in **order not to exceed achieved level to which the area is developed**.

- It should be ensured that **planned detached construction areas are not utilised**, i.e. that they are **strictly protected until serious and complete projects for their development are proposed** with considerable implementation guarantees. The highest risk from **hypertrophic construction areas** is a possibility to initiate in all of them **small-scale, unaligned, partial interventions that will irreversibly degrade the space and destroy development potential of large sections of the coastal zone**.
- **Costal setback needs to be applied** in line with elaborated criteria. This includes areas where setback is not applicable, where its adaptation (decrease) is possible, as well as those where adaptation is not allowed or exceptionally areas where setback can be expanded. In applying the setback it is necessary to respect inherited rights (DSL, LSL, DUP, UP) as well as contractual obligations resulting from tender procedures.
- As a part of maintaining prescribed **spatial documentation basis**, the Ministry of Sustainable Development and Tourism **should monitor and document how setback adaptation is used**, especially when it comes to adaptation **due to inherited rights** and adaptation **for projects of public interest**. The same needs to be monitored through the regular reports on spatial arrangement too. It is also important to **determine the state of detailed planning documents (DSL, LSL, DUP, UP) on the date when national legal act will come into force** and have this data archived in the spatial information system.
- It is necessary to ensure **integration of valuable parts of the coast where setback adaptation is not proposed with neighbouring spaces in their immediate hinterland** that should remain in their natural state due to landscape, nature and other qualities i.e. that should **become part of a system of open spaces** where intensive urbanisation is not planned.
- Identified **open spaces** with preserved natural, cultural and landscape values and with mainly rural characteristics **are the key elements for attaining wide recognisability of the Montenegrin coast and its traditional values and as such they should become an important attraction and significant segment of a high-quality tourism offer**. This approach is based on their significant economic potential with positive impacts on GDP, which should become complementary to the existing tourism offer, primarily through large investments in tourism. Diversification of the tourism offer and extension of the tourist season would be provided in this way. For these reasons, it is necessary that SPSP CZ MNE provides for sustainable valorisation of open spaces with mainly rural characteristics. At the same time, NS ICZM MNE needs to consider them in the context of proposals for valorisation of spatial resources as an integral element of the entire system of sustainable integrated development of the coastal zone of Montenegro.
- **For the part of the coastal zone** spreading over **some 8,000 ha** which represents an area with overlaps and potential conflicts between open spaces with preserved natural, cultural and landscape values and mainly rural characteristics on one and construction areas on the other side, it is necessary to **carry out optimisation of land uses, partly through revision of construction areas**.
- In addition to spatial planning instruments it is necessary to also **plan complementary land and fiscal policy measures** to regulate and direct spatial development. In this sense, of particular importance is **general tax on real estate (with an emphasis on higher taxation for construction land)** or **tax on undeveloped construction land** that can have progressive rate

until the land is brought to a planned purpose. **Tax on capital profit** can be also considered aiming to capture extra profits from converting other land uses into construction land (projects of public interest could be exempted from its application) as well as **tax on changing the use of agricultural land** that has a similar purpose but is mainly used to provide incentives for rural and agriculture development.

- In the context of applying proposed instruments and measures it is necessary to **adopt changes and amendments of certain national regulations**. Law on Spatial Arrangement and Construction of Objects needs to be amended with provisions that will regulate fulfilment of obligations from implementing the ICZM Protocol, especially in relation to **setback application and adaptation** (deadlines for inherited rights), **definition of projects of public interest**, as well as **obligation of monitoring and reporting** on the implementation of prescribed legal norms. Moreover and in relation to presented principles on protection of rural areas, according to the ICZM Protocol it is necessary to **define criteria for sustainable use of the coastal zone**, especially for **identification and determination of boundaries for open spaces where urban development is limited (or, if necessary, prohibited)** through the national legal act (the best solution would be to do it through the Law on Spatial Arrangement and Construction of Objects). Having in mind a wide range of their effects, **land and fiscal policy instruments** need to be elaborated in co-ordination with other parts of administration to ensure alignment of all the regulations in this area.
- Based on the SPSP CZ MNE, which should be prepared in line with recommendations and guidelines presented here, and through identification of problems and causes that led to unsustainable trends in the coastal zone's development, **NS ICZM MNE** shall define **strategic priorities of integrated development and management of the coastal zone and elaborate goals and measures for their implementation**. Among other priority problems and shortcomings the following will be addressed: **insufficient level of integration of environmental goals into other sectoral policies** (economic, social, cultural and spatial planning policies); **unsustainable trends in planning and rational use of coastal zone's space**; **not using possibilities for greening the coastal zone's economy**; **lack of monitoring mechanisms** (information basis); **inadequate institutional and legal framework to provide for the application of ICZM instruments**; and **insufficiently developed capacities and necessity to raise awareness of the importance of integrated development and management of the coastal zone**. The **ICZM Plan** will start from measures defined in the NS ICZM to further elaborate them by defining their implementation in spatial terms and provide for their further operationalization through an action plan containing a portfolio of priority projects. Based on conducted analyses of state and processes of transformation of the coastal zone, a prominent place among ICZM instruments will be reserved for those required under the ICZM Protocol including: **controlling urbanisation in line with vulnerability, suitability and attractiveness of the coastal area**; **application of carrying capacity for tourism**; **coastal setback**; and **protection of open/ rural spaces**. In this context, **instruments of land and fiscal policies** will be considered at operational level and on the level of simulating their application.

Montenegro
GOVERNMENT OF MONTENEGRO
Number: 08-2878/8728/3
Podgorica, 26 December 2013

MINISTRY OF SUSTAINABLE DEVELOPMENT AND TOURISM
Mr. Branimir Gvozdenovic, Minister

PODGORICA

At the session held on 18 December 2013, the Government of Montenegro considered the Information on the Implementation Results of the Coastal Area Management Programme of Montenegro (CAMP MNE) in the Context of Preparation of the Special Purpose Spatial Plan for the Coastal Zone of Montenegro (SPSPCZ MNE) and of the National Strategy for Integrated Coastal Zone Management of Montenegro (NS ICZM MNE), submitted by the Ministry of Sustainable Development and Tourism.

In relation to this, the Government adopted the following

CONCLUSIONS

1. The Government adopted the Information on the Implementation Results of the Coastal Area Management Programme of Montenegro (CAMP MNE) in the Context of Preparation of the Special Purpose Spatial Plan for the Coastal Zone of Montenegro (SPSPCZ MNE) and of the National Strategy for Integrated Coastal Zone Management of Montenegro (NS ICZM MNE) as a part of activities on execution of the Agreement relating to implementation of the Coastal Area Management Programme of Montenegro (CAMP MNE). The Agreement was concluded on 1 June 2011 between the Government of Montenegro as a party to the Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean (Barcelona Convention) and the United Nations Environment Programme (UNEP), as the Barcelona Convention Secretariat.
2. The Ministry of Sustainable Development and Tourism and other relevant ministries are hereby mandated to enable integration of the Coastal Area Management Programme of Montenegro (CAMP MNE) results presented in this Information into the new Special Purpose Spatial Plan for the Coastal Zone of Montenegro (SPSPCA MNE), and municipalities are mandated to enable their integration in the processes of development and adoption of municipal spatial-urban plans (PUP) and other spatial planning documents, in order to create preconditions for sustainable economic valorisation of potentials of the coastal zone of Montenegro.
3. The Ministry of Sustainable Development and Tourism is hereby mandated to continue providing support, in accordance with CAMP Montenegro results presented in this Information, to the on-going process of drafting the National Strategy for Integrated Coastal Zone Management of Montenegro with the Management Plan and the Action Plan in order to create conditions for implementation of the Protocol on Integrated Coastal Zone Management (ICZM Protocol).

SECRETARY GENERAL

Zarko Sturanovic
(stamped and signed)

ANNEX: Statistical data and maps

Table 1: Surface of vulnerable areas and their share in the total municipal territories taking into account vulnerability grades from cumulative vulnerability assessment – model of pronounced protection of the most significant elements

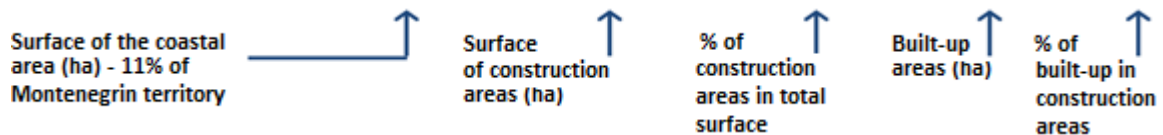
Grade	Very low vulnerability (1)		Low vulnerability (2)		Moderate vulnerability (3)		High vulnerability (4)		Very high vulnerability (5)	
	ha	%	ha	%	ha	%	ha	%	ha	%
Municipality	ha	%	ha	%	ha	%	ha	%	ha	%
Bar	473	1	482	1	16236	35	13336	29	15380	34
Budva	329	3	51	>1	2400	19	3477	28	6324	50
Herceg Novi	470	2	436	2	7489	33	7412	33	6554	29
Kotor	450	1	198	1	13793	41	10066	30	9143	27
Tivat	256	6	133	3	1287	28	1065	23	1893	41
Ulcinj	66	>1	129	1	3319	13	10956	42	11386	44
Total	2044	1	1429	1	44524	31	46312	32	50680	35

Table 2: Surface of vulnerable areas and their share within the belt encompassing 100 m from the shoreline by municipalities and vulnerability grades taking into account vulnerability grades from cumulative vulnerability assessment – model of pronounced protection of the most significant elements

Grade	Very low vulnerability (1)		Low vulnerability (2)		Moderate vulnerability (3)		High vulnerability (4)		Very high vulnerability (5)	
	ha	%	ha	%	ha	%	ha	%	ha	%
Municipality	ha	%	ha	%	ha	%	ha	%	ha	%
Bar	189	6	315	10	840	27	1133	36	658	21
Budva	190	7	31	1	541	20	957	36	966	36
Herceg Novi	267	7	147	4	1712	42	1183	29	794	19
Kotor	9	>1	38	1	2465	42	1557	27	1785	30
Tivat	233	9	131	5	925	37	628	25	614	24
Ulcinj	11	>1	34	1	516	18	1387	48	933	32
Total	899	5	696	3	6999	33	6845	32	5750	27

Table 3: Indicators of the planned level to which construction areas (CA) are to be built up and used, status by municipalities in 2011 (Source: Analysis of the level to which the coastal area has been built up, CAMP MNE, 2013)

Indicators of the planned level to which construction areas (CA) are to be built up and used, status by municipalities in 2011					
Municipality	Total surface (ha)	CA (ha)	CA/ total (%)	Built (ha)	Built/ CA (%)
columns	1	2	3=2/1	4	5=4/2
Bar	50,429	4,326	8.6	1,331	30.8
Budva	12,243	2,628	21.5	535	20.3
Herceg Novi	23,360	7,017	30.0	844	12.0
Kotor	33,575	2,659	7.9	517	19.5
Tivat	4,745	1,339	28.2	519	38.8
Ulcinj	26,105	5,394	20.7	575	10.7
Total	150,457	23,363	15.5	4,321	18.5



Croatian counties

Istarska	281,300	19,389	6.89	10,044	51.8
Primorsko g.	358,700	15,202	4.24	11,843	77.9
Zadarska	364,700	23,376	6.41	16,155	69.1
Sibensko k.	298,900	14,739	4.93	7,970	54.1
Dubrovačko n.	177,900	7,120	4.00	4,650	65.3

Sustainable share of construction areas is 4 - 7% (depending on population density); in the coastal region of MNE, this value is 15.5%

The lower the level to which construction areas are built - the lesser level of sustainability; in the coastal region of MNE, this value is 18.5%

Indicators of the planned level to which construction areas are to be built up and used within the 1000 m wide belt, status in 2011					
Municipalities	Total surface (ha)	CA (ha)	CA/ total (%)	Built (ha)	Built/ CA (%)
columns	1	2	3=2/1	4	5=4/2
Bar	3,103	2,256	72.7	797	35.3
Budva	2,676	1,470	54.9	440	29.9
Herceg Novi	4,256	2,684	63.1	678	25.2
Kotor	5,721	1,337	23.4	393	29.4
Tivat	2,727	1,072	39.3	435	40.6
Ulcinj	2,908	1,085	37.3	217	20.0
Ukupno	21,391	9,905	46.3	2,961	29.9

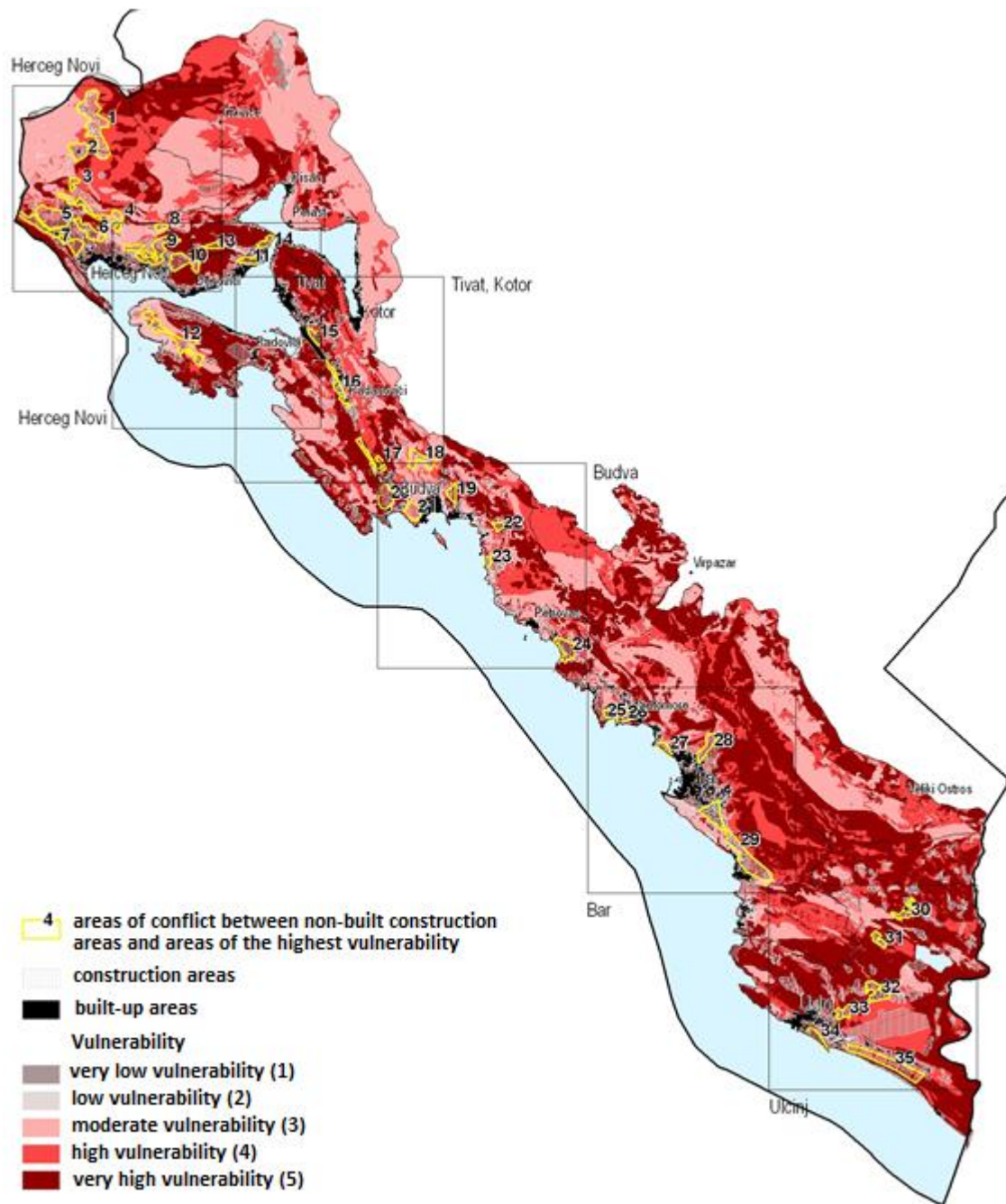


Illustration 1: Areas of conflict between non-built construction areas and areas of the highest vulnerability – cumulative model of general vulnerability

Table 4: Vulnerability of space in conflict zones

Grade	Very low vulnerability (1)		Low vulnerability (2)		Moderate vulnerability (3)		High vulnerability (4)		Very high vulnerability (5)		Total (ha)
	ha	%	ha	%	ha	%	ha	%	ha	%	
HERCEG NOVI											
1. Vrbanj	0	0	1	0	11	6	142	85	13	8	168
2. Kruševice	7	1	1	0	44	7	551	85	49	8	652
3. Kruševice	1	2	0	0	4	9	3	7	39	82	48
4. Mokrine – Kameno	6	2	1	0	6	2	52	20	198	75	263
5. Prijedor – Mojdež	2	1	0	0	1	0	123	37	207	62	332
6. Ratiševina – Trebišnj	4	2	1	1	6	4	35	22	117	72	163
7. Sutorina	3	1	0	0	0	0	69	26	193	73	265
8. Žlijebi	0	0	0	1	1	2	0	1	41	96	42
9. Podi - Šašovići – Kudi	2	1	2	0	11	3	84	25	235	70	334
10. Kuti	0	0	0	0	0	0	25	11	202	89	228
11. Biljela – Jošice	1	1	0	0	1	2	1	2	57	94	61
12. Luštica	0	0	17	5	74	22	223	66	26	8	340
Total	26	1	23	1	159	5	1308	45	1377	48	2896
TIVAT											
13. Bijelske Kruševice	0	0	0	0	1	1	4	8	50	91	55
14. Đurići	0	0	0	0	0	0	3	5	59	95	62
15. Mrčevac	1	1	0	0	0	0	17	21	64	78	82
Total	1	>1	0	0	1	>1	24	12	173	87	199
KOTOR											
16. Radanovići	2	3	0	0	1	3	27	56	19	38	49
17. Gorovići – Lastva	1	1	0	0	0	0	13	11	101	88	114
Total	3	2	0	0	1	>1	40	24	120	74	163

Grade	Very low vulnerability (1)		Low vulnerability (2)		Moderate vulnerability (3)		High vulnerability (4)		Very high vulnerability (5)		Total (ha)
	ha	%	ha	%	ha	%	ha	%	ha	%	
Areas of conflict											
BUDVA											
18. Pobori	1	0	2	1	1	1	29	17	143	81	176
19. Ostrog	1	1	0	0	1	0	2	3	69	95	72
20. Mrčevo polje	7	4	0	0	12	7	51	28	112	62	182
21. Prijedor	3	2	0	0	0	0	20	14	121	84	144
22. Kuljaće	0	0	0	0	2	4	4	9	42	87	48
23. Sveti Štefan	0	1	0	0	3	9	19	58	10	32	33
24. Buljarica	0	0	0	0	2	3	5	6	75	91	168
total	12	1	2	>1	21	3	130	16	572	70	823
BAR											
25. Zagrade	0	0	0	0	5	9	42	83	4	7	50
26. Sutomore	2	3	0	0	11	15	10	14	47	68	70
27. Šušanj	1	2	0	0	3	5	24	43	29	50	57
28. Župci	6	4	0	0	26	18	85	60	27	19	144
29. Barsko polje - Dobre vode	5	1	24	4	54	8	355	54	214	33	651
total	14	1	24	2	99	10	516	53	321	33	972
ULCINJ											
30. Vladimir	1	1	3	3	0	0	31	29	72	67	106
31. Donja Klezna	0	0	0	0	0	0	13	13	85	87	98
32. Saško jezero	0	0	0	0	10	12	0	0	78	88	89
33. Žoganj	2	1	0	0	4	2	100	43	124	54	230
34. Kodre – Kolonza	0	0	0	0	0	0	34	29	83	71	118
35. Ulcinj	0	0	0	0	1	1	57	57	41	41	100
36. Velika plaza	0	0	0	0	0	0	394	87	59	13	453
Total	3	>1	3	>1	15	1	629	53	542	45	1194
TOTAL	59	1	52	1	296	5	2647	43	3105	50	6247

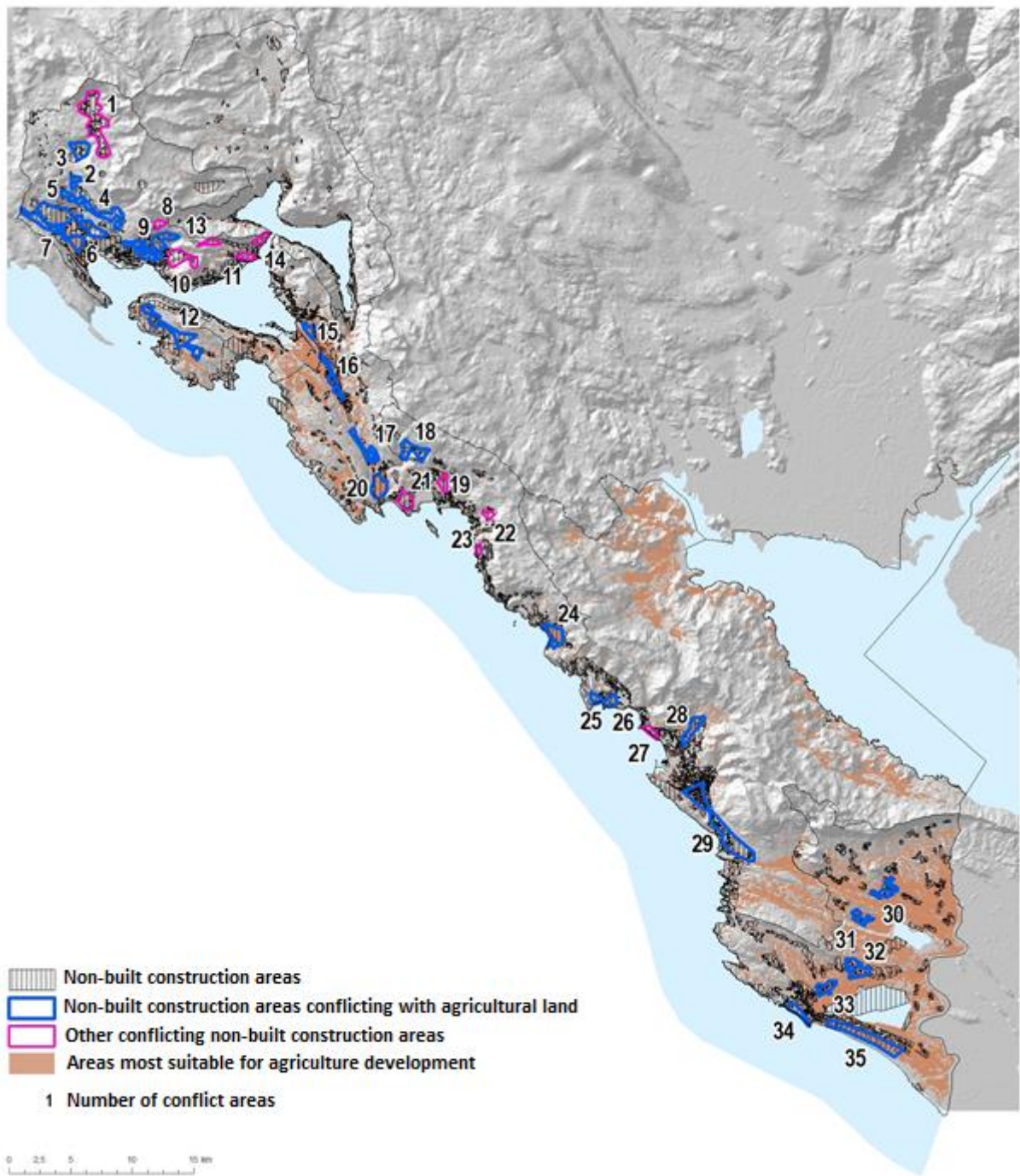


Illustration 2: Surface of larger areas with non-alignment (conflicts) between non-built construction areas and areas (entirely or partly) suitable for agriculture

Table 5. Criteria and guidelines for defining the coastal setback. Left part of the Table are anthropogenic criteria where categories of the setback zone are taken over from previous analysis. Right part of the Table defines natural criteria integrated within 4 degrees of vulnerability according to vulnerability assessment of the narrow coastal zone. Cross-sections of anthropogenic and natural criteria provide matrix with guidelines for defining the setback line as well as possibilities and conditions for its expansion in line with the ICZM Protocol provisions.

	Land use	State of development	Description	Planning document	Natural criteria			
					R1 lower vulnerability	R2 moderate vulnerability	R3 high vulnerability	R4 highest vulnerability
Anthropogenic criteria	1. Construction areas (CA) in settlements	1. Built-up	1.1 areas of coastal settlements, built-up or brought to a planned use, undivided CA		1 built-up area – setback is not applicable, 60,147m, 25.9%			
				2. Partly built-up	1.2 areas of coastal settlements, partly built-up, linear or discontinuous CA	DSL	2 adaptation, acquired development rights 2,595m, 1.1%	
		LSL	2 adaptation, acquired development rights, 0			2 adaptation, acquired development rights, 0		
		DUP/UP	2 adaptation, acquired rights, 7,986m, 3.4%			2 adaptation, acquired rights, 4,694m, 2.0%		
		Other plans	3 adaptation, urban planning criteria, 2,799m, 1.2%			4 adaptation, urban planning criteria and additional measures, 0		
		3. Undeveloped parts	1.3 undeveloped parts of construction areas in settlements	DSL	2 adaptation, acquired development rights, 1,410m, 0.6%			
				LSL	2 adaptation, acquired rights, 93m, 0.0%	2 adaptation, acquired rights, 385m, 0.2%		
				DUP/UP	2 adaptation, acquired rights, 4,720m, 2.0%	2 adaptation, acquired rights, 307m, 0.1%		
				Other plans	3 adaptation, urban planning criteria, 3,072m, 1.3%	9 no adaptation, 0		
		2. CA outside settlements	1. Built-up	2.1 built-up detached zones, primarily for tourism purposes		1 setback is not applicable, 8,204m, 3.5%		
	2. Partly built-up				2.2 areas of detached zones, primarily for tourism purposes, partly built-up	DSL	2 adaptation, acquired development rights, 13,744m, 5.9%	
			LSL	2 adaptation, acquired development rights, 0		2 adaptation, acquired development rights, 0		
			DUP/UP	2 adaptation, acquired rights, 525m, 0.2%		2 adaptation, acquired development rights, 0		
			Other plans	3 adaptation, urban planning criteria, 1,924m, 0.8%		6 adaptation, projects of public interest with additional measures, 718m, 0.3%		
3.	2.3 undeveloped	DSL	2 adaptation, acquired development rights, 12,745m,					

	Undeveloped parts	areas of detached zones, primarily for tourism purposes		5.5%	
			LSL	2 adaptation, acquired development rights, 0	2 adaptation, acquired development rights, 0
			DUP/UP	2 adaptation, acquired rights, 4,800m, 2.1%	2 adaptation, acquired rights, 6,196m, 2.7%
			Other plans	5 adaptation, projects of public interest, 3,211m, 1.4%	9 no adaptation, 10,050m, 4.3%
3. Coast outside CA planned to remain in its natural state	1. Built-up	3.1 Areas built-up through illegal construction	-	1 setback is not applicable, priorities formalization and rehabilitation, 1,378m, 0.6%	1a setback is not applicable, priorities formalization and rehabilitation, additional measures, 289m, 0.1%
	2. Partly built-up	3.2 Partly built-up areas through illegal construction	-	7 adaptation, priority formalisation and rehabilitation, 3,977m, 1.7%	8 adaptation exclusively in the function of formalisation and rehabilitation, additional measures, 1,536m, 0.7%
	3. Undeveloped parts	3.3 Untouched, natural coast	-	5 adaptation, projects of public interest, 20,596m, 8.9%	9 no adaptation, 54,193m, 23.3%

Table 6. Total lengths and percentages for different types of setback presented in Table 5

Setback type	Length (m)	%	Description of the setback type (category)
1	70,018	29.2	built-up area – setback is not applicable
2	51,862	21.6	no setback due to acquired development rights* – state contracts, DSL, LSL, DUP and UP
3	7,795	3.2	adaptation in partly built-up CA, <u>urban planning criteria</u>
4	0	0.0	adaptation in partly built-up CA, <u>urban pl. criteria with additional measures</u>
5	23,807	9.9	adaptation for <u>projects of public interest</u>
6	718	0.3	adaptation for <u>projects of public interest with additional measures</u>
7	3,977	1.7	adaptation, priority <u>formalisation and rehabilitation</u>
8	1,536	0.6	adaptation, priority formalisation and rehab. with <u>additional measures</u>
9	64,244	26.8	no adaptation
10	16,200	6.7	conditions for expansion
Total	240,157	100.0	

* The share can be changed depending on the status of implementation of signed state contracts in the context of acquired development rights

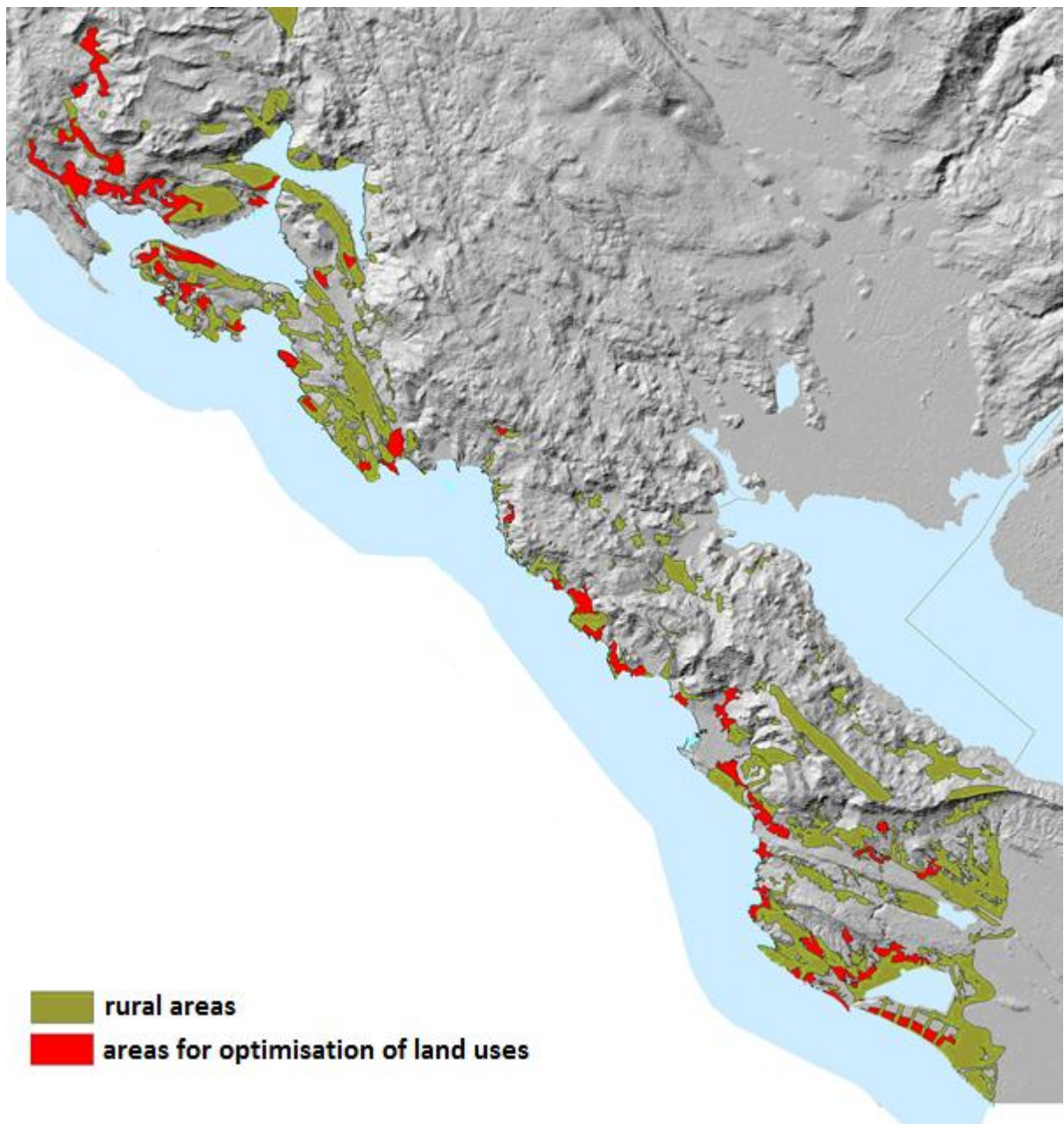


Illustration 3: Optimisation of land uses