

## ENDANGERED 20TH-CENTURY HERITAGE IN BELGRADE (SERBIA) – STRATEGIES FOR SAFEGUARDING AND PRESERVATION

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**ABSTRACT:** On November 14, 2024, the Serbian government removed Belgrade's General Staff and Ministry of Defense buildings from the immovable cultural heritage monuments register, disregarding strong opposition from experts and the public. Even the Heritage Alert issued by the International ICOMOS was ignored. This decision represents one of the most drastic actions among various (un)legal strategies that deliberately lead to demolishing or neglecting 20th-century architectural heritage and has sparked research into the implications of a trend observed since the turbulent 1990s.

The findings reveal that, despite signing (or re-signing) international documents and agreements, the new Serbian state has been unprepared to establish a system for properly recognising, preserving, and managing its built heritage. By analysing numerous examples, the research uncovers various typical preconditions and decisions that facilitate the inadequate treatment of historic buildings and urban areas. Heritage has been sacrificed for profit, breaching legal frameworks and the principles and concepts of cultural heritage, along with its societal significance. Violating cultural property law risks completely undermining the cultural heritage protection system, potentially resulting in the loss of significant national heritage, highlighting this urgent issue.

Many doctrinal texts, including the Faro Convention, which marks its 20th anniversary in 2025, show us the path but cannot save monuments, especially in less wealthy countries, even if there are well-organised institutions and trained professionals. Belgrade's heritage faces not an exclusive issue but a widespread one: experts are overshadowed by government and political agendas.

**KEY WORDS:** Historic Built Environment, Heritage Preservation, Heritage Law Violations, Urban character erosion, Globalisation

## Introduction and research aim

### ***Consequences of investor-led urbanism and how to prevent further devastation***

In recent years, the capital of Serbia has faced negative impacts from investor-led urbanism. The Law on Cultural Heritage is openly violated, and the focus of heritage destruction is on mid-war architecture and structures from the socialist era<sup>1</sup>. With financial gain as the sole motive, the State is transferring the most expensive plots of city-center land to local and foreign developers, leading to the construction of entirely inappropriate structures in traditional areas of Belgrade, thereby altering its identity. The implication of this trend, observed since the turbulent 1990s, is the focus of this research.

Several examples throughout the city reveal typical preconditions and decisions that facilitate the inadequate treatment of historic buildings and urban areas. (Fig. 1) Despite signing (or re-signing) international documents and agreements, along with the long-standing reputation of Serbian scholars and professionals in the field of cultural heritage preservation, the State has been unwilling to strengthen institutions for the protection of cultural monuments and to establish a system for properly recognising, preserving, and managing its built heritage.



Fig. 1. Residential area K-District at the outskirts of the Belgrade Fortress is a glaring example of neglect of the city's historical values in favour of direct investment. Photo: Miroslav Dragojević. Danas. 2021/10/7; <https://www.danas.rs/vesti/drustvo/vlast-prodala-kalemegdan-za-solitere-i-garaze/> Accessed October 10, 2023

<sup>1</sup> The older parts of the city, including the Belgrade Fortress and remains of the Roman castrum and Singidunum, have long been at risk as well. A proposed transformation of the Sava and Danube riverbanks into a 5 km park, originally envisioned to connect the city with its rivers, has instead led to the neglect of historical values in favor of direct investment. Urban planning changes have enabled construction that irreversibly compromised two key symbols on the city's coat of arms – the views of the Fortress and the riverscape. Any historic site along the rivers is now targeted due to its prime location.

The rising demand for apartments, local economic conditions, and global investments in Serbia's real estate market in the last decades have significantly endangered built heritage. This research aims to uncover legal gaps, procedures, decisions, and (il)legal actions that have resulted in its deterioration, supported by an extensive review, thorough analyses, and an evaluation of the consequences of excesses over the past thirty years. The final goal is to identify measures that could avert such incidents in the future.

Following the trend of aggressive assaults on historic buildings and areas, along with neglect of the value of the inherited cityscape, Belgrade has already experienced a significant loss of its urban identity. This paper aims to highlight the laws and procedures that enable the destruction of cultural properties and to explore the impact of these acts. It also emphasises the critical concern that violations of cultural property law could lead to the complete erosion of the cultural heritage protection system and the potential disappearance of much of the national heritage. Finally, it suggests what should be avoided and the legal framework that should be applied to prevent unacceptable attitudes toward heritage in the future. The joint action of experts and the city's local communities, as suggested by many doctrinal texts, including the Faro Convention, which celebrates its 20th anniversary in 2025, is essential for strengthening awareness among citizens and the wider public. It could also fortify the position of experts and citizens in the decision-making process, despite being overshadowed by government and political agendas for decades.

## Theory

### ***Background of the expansion of new construction in Serbia that endangers built heritage***

Serbia experienced a significant population influx during the 1990s civil war, with hundreds of thousands of refugees from various territories of the former Yugoslavia settling mostly in the two largest cities. Despite low birth rates and high emigration, Belgrade's population has grown by around 80,000 since 1991 due to net immigration. Meanwhile, Novi Sad's population increased by a quarter, rising from 265,464 in 1991 to 341,625 in 2022, and is now estimated at around 385,000<sup>2</sup>.

Numerous newcomers, often from diverse backgrounds, hesitated to integrate and imposed their own lifestyles instead. Initially, they built makeshift homes atop existing structures without facing consequences. Although modernity eventually arrived, it did not manifest as remarkable architectural achievements. Instead, it presented as unremarkable "mediocrity" architecture.

Following rapid economic growth, demand for housing surged throughout the country. The swift increase in newly constructed square meters from 1999 to 2025, along with a rise in real estate prices, is evident according to the statistical data<sup>3</sup>. After stabilising in the late 2000s as part of post-conflict recovery, the real estate market expanded throughout the 2010s. Belgrade central urban areas, such as Vračar and Stari Grad, have experienced heightened demand, further

<sup>2</sup> Statistical Office of the Republic of Serbia. <https://www.stat.gov.rs/sr-latn/oblasti/stanovnistvo/>, accessed: 15.02.2025.

<sup>3</sup> A comprehensive view of trends is collectively provided by various reputable source as *Investropa*, *City Expert*, *CBS International*, *Global Property Guide*, and *Statista*.

stimulated by increased foreign investment and infrastructure projects, all leading to noticeable price appreciation<sup>4</sup>.

As a result, new neighbourhoods were developed in all “suitable and prestigious” locations, irrespective of the existing structures or their status. Planned skyscrapers clash with Belgrade’s layered history – from the Roman fortress, to Ottoman, an oriental town for many centuries, and to a modest 19th-century European metropolis, still retaining many features from previous periods. Some undeveloped zones were entirely demolished for modern developments, like Belgrade Waterfront. The 2021 General Urban Plan permits new construction on almost all remaining spaces, including open areas previously designated for public use or green spaces in New Belgrade, a mid-20th-century planned city<sup>5</sup>, based on inter-war draft urban ideas.

### ***Cultural heritage protection system in Serbia and the background of recent demolitions***

Cultural heritage in Serbia is under the protection of the Ministry of Culture and a network of fourteen regional institutes, with the Republic Institute serving as the central authority. Two city institutes supervise two major cities, Novi Sad and Belgrade. In addition to the laws in the field of cultural properties<sup>6</sup>, the Law on Planning and Construction (2009-2023) provides certain protections based on the institute’s decisions. Nevertheless, some provisions in this law and bylaws<sup>7</sup> allow the evasion of cultural heritage protection. Final revisions of urban planning documents are carried out by city-appointed commissions, which can override heritage protection recommendations established by institutes. This loophole has been exploited, resulting in unlawful approvals and inappropriate interventions, including demolitions. Even the implementation of Heritage Impact Assessments has been undermined by interpretations from the Ministry of Construction, Transportation, and Infrastructure<sup>8</sup>.

Moreover, illegal practices are frequently overlooked. Some investors, unable to obtain a building permit, deliberately allow protected buildings to deteriorate, setting the stage for eventual demolition under the guise of neglect. This strategy has led to the loss of many historic buildings, especially mid-19th century and early 20th century villas and public structures in older city districts, often during delays in service decision-making or while the decision on protection

<sup>4</sup> By 2023, average prices in the centre of Belgrade exceeded €2,500 per square meter, with luxury developments reaching average apartment prices between €3,000 and €5,000 per square meter. The sale of apartments in the Belgrade Marina announced in January 2025 achieved an extraordinary price of €8,000 per square meter.

<sup>5</sup> According to the General City Urban Plans from 1950 and 1972.

<sup>6</sup> Law on Culture (2009, the last amd. 2023), Law on Cultural Heritage (2021), and Law on Cultural Assets (1994, amd. 2011, 2023)

<sup>7</sup> *The Rulebook on the content, manner and procedure of drafting planning documents*, (2019), Article 72. <https://www.mgsi.gov.rs/lat/dokumenti/pravilnik-o-sadrzini-nacinu-i-postupku-izrade-dokumenata-prostornog-i-urbanistickog/>

<sup>8</sup> The Act on the Implementation of Regulations related to the opinion on the preparation of the Study for the Protection of Immovable Cultural Property prior to the adoption of the Decision on the preparation of the planning document, according to the Law on Inspection Supervision (2015, amended in 2018).

was awaiting final confirmation by the government<sup>9</sup>. (Fig. 2) Though the Law on Planning and Construction requires permits for demolition, it does not impose penalties for illegal acts. Moreover, the Criminal Code (2019) fails to classify unauthorised demolition as a crime, further enabling private interests over public ones.

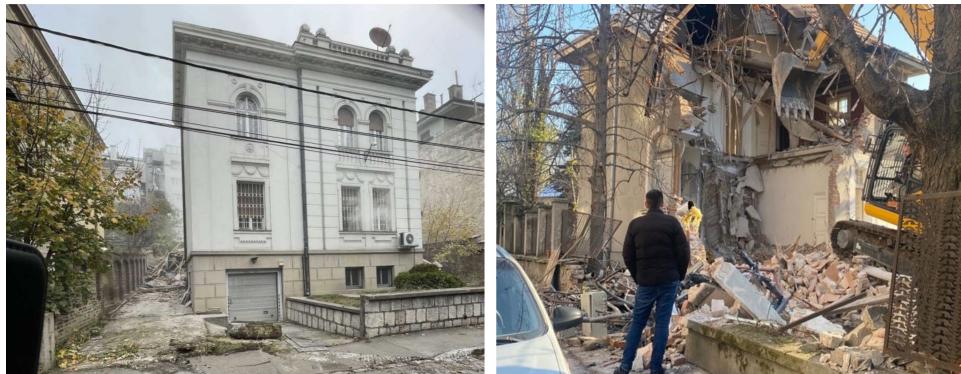


Fig. 2. The family house of famous architect Ivan Antić from the 1930s at Kotež-Neimar, 47 Internacionalnih brigada St, was demolished without legal permission, with a few breaks from 2021 to June 4, 2023. Left – Building in Int. Brigada 47 at Kotež-Neimar. Photo by Društvo za očuvanje Neimara [Society for the Neimar preservation]. Vreme. 2023/6/5. <https://vreme.com/vesti/naneimaru-srusena-i-anticeva-vila-zakon-ne-predvidja-kaznu-za-rusenje-bez-dozvole/> Accesed February 12, 2025; Right – Demolition of the building in Int. brigade 47. Photo by Olga Milovanović, Stranka slobode i pravde [Party of freedom and justice]. Nova.rs. 2024/12/28. <https://nova.rs/vesti/drustvo/srusena-vracarska-lepotica-pogledajte-kako-je-jos-jedna-bozanstvena-vila-otisla-uzaborav/> Accesed February 12, 2025.

For years, 20th-century architecture was overlooked by heritage services, as professionals believed that time would validate its value and confirm their perspective. However, efforts to preserve these buildings through research and evaluation coincided with a rising demand for the central city zone, leading to their destruction. (Fig. 3)

<sup>9</sup> Under the Law on Cultural Heritage, the relevant institute declares a three-year pre-protection period to prepare documentation, which is then double-checked by the Republic Institute and submitted to the Ministry of Culture. In some cases, the Belgrade City Institute failed to complete the documentation, but more often, delays stemmed from communication breakdowns between the Ministry, Government, or Assembly. The striking fact is that most procedures were stalled just before the final protection decision.

The 2022 Law on Cultural Heritage allows the pre-protection period to be extended by three years with protection taking effect upon submission of documentation to the Ministry of Culture.

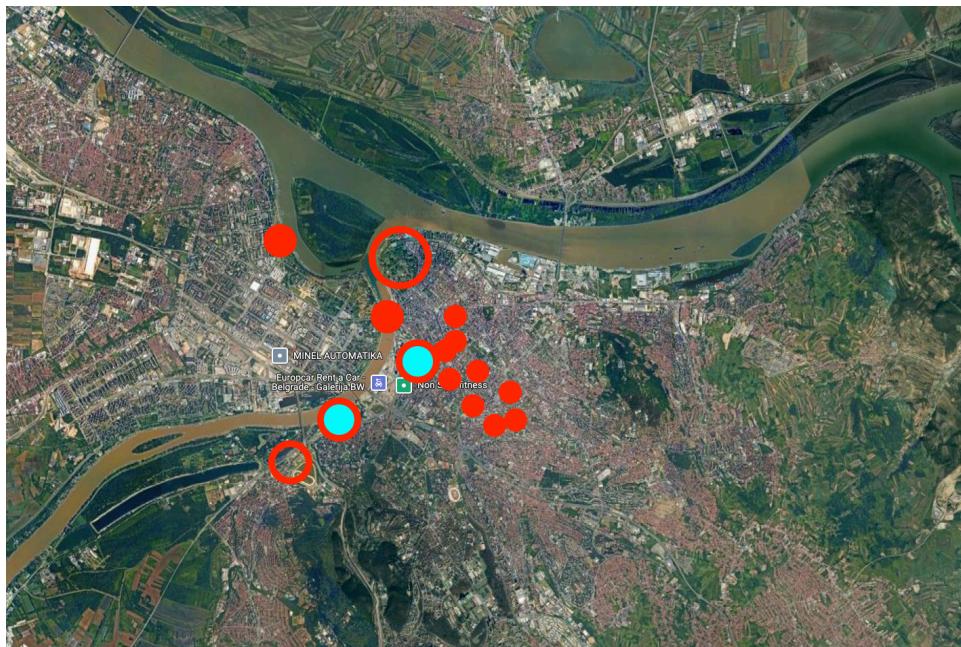


Fig. 3. Annotated map of Belgrade showing demolished sites (marked with a red dot) and endangered historic sites planned for demolition or major reconstruction (indicated by a blue-filled red circle). Source: Screenshot of Google Maps with author-added markers

#### ***Status of the most prominent endangered buildings – recent case studies***

A striking example is the **Belgrade Fair Complex**. After the original fairground<sup>10</sup> was used during the WWII as a concentration camp (*Semlin Judenlager*), a new complex was built in 1957 along the right bank of the Sava River, based on the first-prize winning concept by architects Vladeta Maksimović and Milorad Pantović, as well as civil engineers Branko Žeželj and Milan Krstić, reflecting socialist Yugoslavia's aspirations. It comprises a group of 18 buildings located over 14 hectares of designed fairground land. (Fig. 4)

<sup>10</sup> Founded in 1923, the Belgrade Fair Society opened a purpose-built complex on the left Sava's bank in 1937.



Fig. 4. Aerial view of the Belgrade Fair complex (1954-1957) designed by architect Milorad Pantović and engineers Branko Žeželj and Milan Krstić. Source: Studio Strugar, Photo by Branislav Strugar.

The Belgrade Fair was declared a cultural heritage site by the Serbian Government on January 20, 2009<sup>11</sup>. Just a few days later, the decision was revoked, limiting protection to only Hall 1 by a new protection decision from March 6, 2009<sup>12</sup>. Both Institutes, the Belgrade City and the Republic, responded tepidly. Despite a change in government in 2013, priorities remained the same. Over a decade later, the city continues planning the complex demolition, with the exception of Hall 1. Due to its innovative urban, architectural, and construction solutions of the time, Belgrade Fair Hall 1 was featured among sixteen architectural masterpieces from Serbia in the exhibition “Toward a Concrete Utopia: Architecture in Yugoslavia, 1948-1980”<sup>13</sup>.

Adjacent to the Belgrade Fair (1957), the **General Staff Complex** (1955-1963), another key subject of this research, was showcased at the same exhibition. (Fig. 5) It occupies a prominent urban site at the intersection of two major streets, designated as a central area in the 19th century, featuring public buildings, primarily intended for state administration and military headquarters, alongside the former Prince Milan's court, as outlined in the partial Belgrade plan for its outskirts, created by Franc

<sup>11</sup> *Službeni glasnik Republike Srbije* [The Official Gazette of the Republic of Serbia]. 4/2009. (25. 01.2009) Beograd: Službeni glasnik.

<sup>12</sup> *Službeni glasnik Republike Srbije* [The Official Gazette of the Republic of Serbia]. 16/2009. (06. 03.2009) Beograd: Službeni glasnik.

<sup>13</sup> *Exhibition Toward a Concrete Utopia: Architecture in Yugoslavia, 1948-1980*. (2018, July 15 – 2019, January 13) Curators Stierli, M. and Kulić, V. Museum of Modern Art, New York. <https://www.moma.org/calendar/exhibitions/3931>

Janke in the 1830s.<sup>14</sup> (Jovanović, 2013; Blagojević 2009) The complex consists of two twin buildings – the General Staff Headquarters (Building A) and the Ministry of Defense buildings (Building B), and it is the only work in Serbia built by academician, university professor, and architect Nikola Dobrović. It shared the fate of earlier buildings on the site – Dragutin Đorđević's former General Staff and Jovan Ilkić's Military Academy, both destroyed in WWII bombing. Severely structurally damaged during two NATO bombings in 1999, Building A and the lower wing of Building B became unusable, while the tower of Building B has remained in use to this day. (Fig. 6)



Fig. 5. General Staff Complex – Secretariat of People's Defense and the Headquarters of the Yugoslav People's Army by Nikola Dobrović (1954-1963). Left – General Staff Complex in 1960s. National Library, Photo: Dušan Debeljković. Right – General Staff Complex in 1960s. Source: Republic Institute for the Protection of Cultural Monuments, Catalogue of immovable cultural property

The complex was designated a monument in 2005<sup>15</sup>, five years after being bombed and partially abandoned. It was legally protected again in 2020 as part of the Spatial Cultural-Historical Unit Area alongside Kneza Miloša Street<sup>16</sup>. Despite explicit opposition from experts and the public, the General Staff and Ministry of Defence buildings were removed from the Cultural Heritage Register on November 14, 2024<sup>17</sup>. This unlawful unilateral decision by the Government enabled a deal with Jared Kushner's "Affinity Partners," committing Serbia to a 99-year lease and the site's demolition for redevelopment.

<sup>14</sup> Jovanović, M. (2013). "The City in our hands": urban management and contextual modernity in nineteenth-century Belgrade. In: *Urban History*, 40(1). 32-50. Cambridge University Press; Blagojević, L. (2009). Urban Regularisations of Belgrade, 1867: Trace vs. Erazure. In: *SAJ – Serbian Architectural Journal*, 1(1). 27-44.

<sup>15</sup> *Službeni glasnik Republike Srbije [The Official Gazette of the Republic of Serbia]*. 115/2005. (27.12.2005) Beograd: Službeni glasnik.

<sup>16</sup> *Službeni glasnik Republike Srbije [The Official Gazette of the Republic of Serbia]*. 159/2020. (30.12.2020) Beograd: Službeni glasnik.

<sup>17</sup> Decision on amendments to the decision on determining the area next to Kneza Milosa Street in Belgrade for a spatial cultural-historical unit = Odluka o izmenama odluke o utvrđivanju područja uz ulicu Kneza Miloša u Beogradu za prostorno kulturno-istorijsku celinu (Official Gazette, 90/15.11.2024). Decision on termination of cultural property buildings of the General Staff of the Army of Serbia and Montenegro and the Ministry of Defense in Belgrade = Odluka o prestanku svojstva kulturnog dobra zgradama Generalštaba vojske Srbije i Crne Gore i Ministarstva odbrane u Beogradu (Official Gazette, 90/15.11.2024)



Fig. 6. The General Staff complex after the 1999 NATO bombing. Source: Studio Strugar. Photo: Branislav Strugar

The decision to remove the General Staff complex from the cultural heritage register violates both legal procedures and the law on cultural property, stripping protection from an existing and significant monument. NC ICOMOS Serbia and the experts from the Republic Institute for the Protection of Cultural Monuments have taken a firm stance: the complex must be restored and reconstructed to reflect its original design and public function. Dobrović's modernist masterpiece of post-war architecture and urban transformation possesses multi-layered meanings – architectural, urban, artistic, authorial, societal, and memorial. Its architecture is exceptional, not only in Serbia but throughout the former Yugoslavia and beyond.

The complex aligns harmoniously with Belgrade's urban fabric, particularly the 19th-century cityscape. Its location at an intersection historically designated in the 1830s for key state and military institutions of the newly formed state further underscores its civic importance. The structure of the complex respects the dynamics of the entire intersection, with the alternation of built structures and open spaces reflecting this role. Through stepped facades and rhythmic voids, it embodies symbolic narratives, one alluding to one of the decisive battles against fascism in the canyon of the Sutjeska River during WWII. Beyond its architectural merit, the complex holds profound memorial value, which is its most cited aspect. As a testimony to the first unauthorised bombing of a European state after WWII, it stands as a monument to the trauma of war and foreign aggression, resonating deeply with generations across the Balkans. Its layered history and symbolism are precisely what make it irreplaceable.

Importantly, the remaining structure allows for complete reconstruction. Original architectural drawings and materials – such as the distinctive red stone façade – are preserved along with much of the core structure. In addition to full restoration, professionals have proposed an alternative: preserving the current ruin with a sensitive modern interpolation that maintains the visibility of the damage while assigning the space a meaningful new function.

The Serbian Academy of Sciences and Arts, along with architectural and arts faculties, professional associations, NGOs, and numerous experts, supported this position by signing the Declaration<sup>18</sup> which demands the preservation of this cultural property.

By initiating the Heritage Alert process<sup>19</sup> the ICOMOS Serbia National Committee sought for assistance from the International Council on Monuments and Sites (ICOMOS), which sent a letter to Serbian authorities on June 5, 2024, expressing concern over pressure on heritage professionals and opposing the abolition of the building's protected status and its unacceptable demolition. Following research by the ICOMOS International Scientific Committee for 20th-Century Heritage and prior studies by the Serbian NatCom, ICOMOS sent a second letter on November 22, 2024, issuing the Heritage Alert "Belgrade's 20th Century Heritage at Risk."

The Serbian Government ignored all appeals, including NatCom's November 17 and November 29 statements, urging it to overturn the hastily made decision. The decision from November 14 paves the way for the proposed development project, which includes residential towers, hotel facilities and a shopping mall, unsuitable functions for the city's administrative centre. (Fig. 7) Other registered cultural monuments on the very same plot, overlooked by the Government's decision – the **Seventh Regiment barracks** from 1895 by Dragutin Đorđević and the **Old General Staff** building from 1928, known as the Stone Palace by Vasily Wilhelm Baumgartner – are also at risk.

<sup>18</sup> Deklaracija o sudbini Beogradskog sajma i Generalštaba [The Declaration on the fate of the Belgrade Fair and the General Staff]. (06.05.2024) Beograd: Akademija inženjerskih nauka Srbije [Academy of Engineering Sciences of Serbia], Udruženje Arhitektata Srbije [Union of Architects of Serbia], et.al <https://www.u-a-s.rs/item/591-d-l-r-ci-sudbini-b-gr-ds-g-s-i-g-n-r-lsh-b.html>

<sup>19</sup> The Heritage Alert was initiated in 2023, first for the Belgrade Fair and almost immediately for the General Staff Complex. Through its decades-long activities and the publication of the journal Modern Conservation since 2013, ICOMOS Serbia NatCom has significantly enhanced various aspects of the cultural heritage field among experts. However, in practice, many international conventions, guidelines, and principles remain unimplemented. The Heritage Alert confirmed both the relevance of our approach towards achieving modern conservation concepts and that we are not alone on this path.



Fig. 7. The Barracks of the 7th Regiment are set to be transformed into Hotel Trump, following the realisation of the proposed development project by Jared Kushner's Afinity Properties. This project includes residential towers, hospitality services, and a shopping mall spread across several structures: three towers, the Barracks, and Baumgarten's Old General Staff building. Apartment sales have already been announced online. Source: Studio Genesis. Bloomberg, Europe Edition, 2025/1/16. <https://www.bloomberg.com/news/articles/2025-01-16/jared-kushner-s-next-bet-a-trump-hotel-with-emirati-billionaire?embedded-checkout=true> Accessed February 15, 2025

These events coincided with the political turmoil triggered by the tragic incident in Novi Sad on November 1, 2024, when 16 people lost their lives due to the collapse of the recently renovated canopy at the city's railway station. The lack of accountability and withheld documentation fueled nationwide unrest, which has been led by student protests for several months and joined by employees of academic and cultural institutions, educators, farmers, and many others who have also raised their voices.

In December 2024, amid daily protests and rising public discontent, several controversial decisions were made. Adjacent to several villas, two notable historic buildings that were not legally recognized as immovable cultural properties were demolished to make way for new construction. (Fig. 3)

The City of Belgrade granted permission to demolish the **Hotel Jugoslavija**, a 1960s architectural icon on the Danube in New Belgrade that hosted global dignitaries and celebrities. Its overall urban appearance and architectural design, along with its interior featuring custom-designed elements, symbolised Yugoslav prestige and significantly contributed to its international recognition in the latter half of the 20th century. Damaged in the 1999 NATO bombing and

later neglected, it remained a remarkable urban landmark. The Millennium team, one of the government-favoured developers and construction companies, took ownership in 2024 and announced the construction of a new complex including a Ritz-Carlton hotel and two apartment towers.

Alongside new developments, Belgrade authorities proposed reconstructing the façades of long-lost buildings that lack valid archival plans as a quick “beautification” strategy. One notable example is the **Old Post Office**, officially referred to as the Post Office Building II. It was initially built in 1929 by Momir Korunović in the Serbian-Byzantine revival style. After experiencing structural damage from WWII bombing, it was reconstructed in 1947, adopting a modernist aesthetic typical of the post-war socialist era. (Fig. 8) In 2018, the city revealed plans for restoring its original façade, which received partial approval from the Belgrade City Institute for Protection. However, following a contract agreement between the City of Belgrade and the Belgrade Waterfront investment, the building was demolished in January 2025 to facilitate a complete reconstruction based on Korunović's design, while adapting the functional layout to serve as a children's museum and theatre.

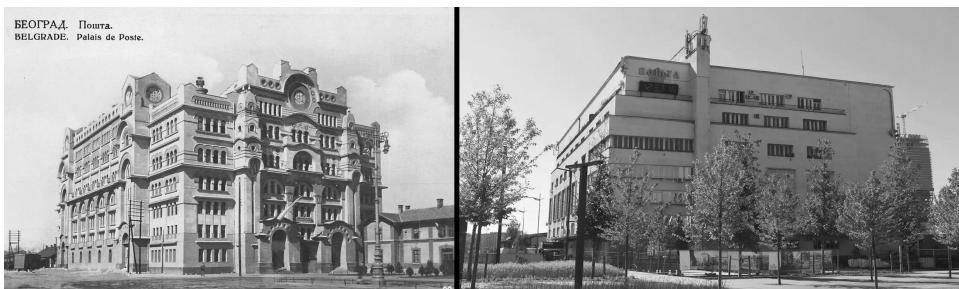


Fig. 8. The Old Post Office by Momir Korunović, after the construction in 1929 and after the reconstruction from 1947. Left – Post Office Building II by M. Korunović. Source: ПТТ Поштанско-телефонско-телефонски музеј [PTT Postal-telegraphic-telephonic Museum]. Belgrade. Collection of postcards. The Post Office Belgrade 2. [http://www.pttmuzej.rs/struktura/lat/galerija/galerija.asp#prettyPhoto\[pp\\_gal\]/2/](http://www.pttmuzej.rs/struktura/lat/galerija/galerija.asp#prettyPhoto[pp_gal]/2/) Accessed October 8, 2023. Right – Belgrade 6 Post Office. Source: Oblakoder. 2023/8/23. <https://www.oblakodermagazin.rs/novi-stambeno-poslovni-objekti-nastavljaju-da-brisu-istoriju-beograda/> Accessed October 8, 2023

The urban renewal development project **Belgrade Waterfront**, launched in 2014 by the Serbian Government with Eagle Hills from Abu Dhabi, aims to transform an undeveloped area of approximately 90 hectares along the Sava River between the Belgrade Fair and Branko's Bridge. Entering its second phase, the project is set to expand beyond the Sava Amphitheatre, doubling the size, expanding southward and across the river. Amendments to the *Spatial Plan for the Special Purpose Area of Belgrade Waterfront* adopted in August 2025, enabled the expansion of the Belgrade Waterfront's contemporary dwelling megastructure, affecting the Belgrade Fair and the protected Topčider Park area.

This action also threatens the **Old Sugar Factory** in Belgrade (1899-1901), which has been endangered since its bankruptcy in 2007. This exceptional industrial-urban site has largely been preserved, retaining its atmosphere and identity, along with several facilities important for the technological process. While earlier plans envisioned a cultural hub, the State did not exercise its pre-emption right following a sale announcement in 2023. Despite having complete documentation from the Republic Institute, the Ministry of Culture unexpectedly halted the legal proceedings. In June 2024, the 11-hectare site, comprising 18 buildings, was sold to a private investor, and current online listings display plans for its complete redevelopment and transformation. (Fig. 9)

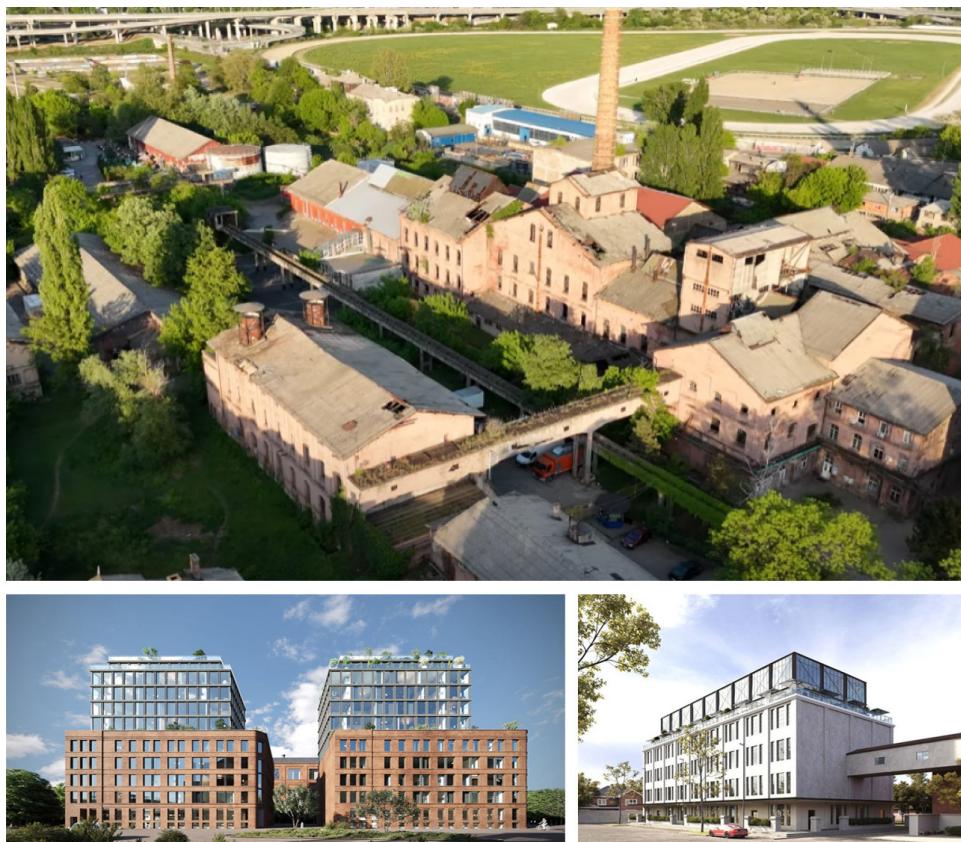


Fig. 9. Old Sugar Factory in Belgrade (1899-1901) and the suggested transformation in 2024. Source: YouTube printscrean. 2024/4/13. <https://www.youtube.com/watch?v=4nZuNC8nqew> Accessed February 15, 2025. Lower photos – Renders by CGI Kite Studio. Gradnja 2024/9/6. <https://www.gradnja.rs/beogradska-secerana-novi-renderi/> Accessed Febrary 7, 2025

## Results, Discussion and Conclusion

### Results

Monuments and historic structures in prominent locations are particularly vulnerable, such as city centre buildings, residential villas, and significant public edifices. Urban planning driven by investors, reinforced by governmental decisions and actions from high-ranking officials, takes priority over the insights of experts. Notable illustrations of this trend include two decisions made by different political groups over a period of fifteen years.

The excesses in the cultural heritage sector have highlighted a rise in the demolition of 20th-century buildings in Belgrade and other Serbian cities in recent decades, particularly in recent years. Any monument or historical structure in a prominent location is at risk, including city-centre dwellings, residential villas, and significant public structures. Investor-driven urban planning, supported by the government and high-ranking authorities' decisions, has taken precedence over expert opinions. The clearest examples are two decisions made by distinct political options over a span of fifteen years.

In 2009, the decision from January 25 to designate the Belgrade Fair complex as a cultural monument was absurdly reversed, following an amendment less than two months later<sup>20</sup>. Without understanding the whole, the protection was reduced to only Hall No 1. The dossier that referred to the protection of the entire complex was literally cut off behind the description of Hall 1, without even deleting parts of the sentences that referred to the entire complex<sup>21</sup>.

In 2024, the illegitimate Serbian government decision revoked the status of the General Staff complex as a cultural asset<sup>22</sup>. In addition to the procedural violation, the legal protection of the still-existing cultural heritage property is being removed.

The proposed demolition of these unique architectural and urban landmarks is not merely an assault on cultural heritage. It also undermines the symbolism and rich memories these complexes hold for various generations. Neither the professional community, the wider public, nor the emergence of Heritage Alert on the ICOMOS website was able to rival the economic interests of the investors and the country's leadership. Precedents such as these two open the possibility for similar procedures to be applied in any further case jeopardising any cultural heritage site. In addition, the purpose of the existence of the service for the protection of cultural monuments is questioned.

<sup>20</sup> *Službeni glasnik Republike Srbije [The Official Gazette of the Republic of Serbia]*. 4/2009. (25.01.2009) Beograd: Službeni glasnik; *Službeni glasnik Republike Srbije [The Official Gazette of the Republic of Serbia]*. 16/2009. (06.03.2009) Beograd: Službeni glasnik.

<sup>21</sup> Due to the pressure from professional groups and organizations, Serbian Academy of Science and Arts, and public opinion, Halls 2 and 3 of the Belgrade Fair are set to be preserved next to the Hall 1 in line with the Spatial Plan for the Special Purpose Area of Belgrade Waterfront adopted in August 2025.

<sup>22</sup> *Službeni glasnik Republike Srbije [The Official Gazette of the Republic of Serbia]*. 90/2024. (15.11.2024) Beograd: Službeni glasnik.

The latest incident involves the fate of the Generalstaff building. On Sunday, 2nd November 2025, a group of 110 representatives from the ruling party, who comprise the majority of the Serbian Assembly, put forward a special law (*lex specialis*) to enable the demolition of the complex and support the planned new development. Despite the clearly unlawful process of delisting based on forged documents<sup>23</sup>, the proposed law was scheduled for discussion within just two days and was approved by 7th November. This rapid approval indicates an apparent intention to demolish the complex before legal challenges, including those related to the fraud involved and the assessment of the law's constitutionality and legality, can be resolved.

### **Discussion**

In cities like Belgrade and Novi Sad, as well as other larger towns, the proportion of residents who have lived there for two or three generations is lower than that of newcomers. This situation is quite typical in our current era. However, when this change occurs rapidly, it initially becomes challenging to provide food and housing for so many individuals, then to help them assimilate into daily life, and finally to educate them about established values so they can articulate their own values as well. However, allowing space for new construction, whether private or public, at the expense of threatening the heritage of the host city is entirely unacceptable, regardless of the challenges and obstacles involved. Local community societies<sup>24</sup>, dedicated to preserving and enhancing neighborhoods and improving quality of life, advocate for maintaining the existing urban fabric rather than allowing its destruction.

International charters that clearly define the concept of cultural heritage and its importance for society are being violated by these and related decisions. To mention only the provisions of the Faro Convention which point to *values derived from the experiences gained through progress and past conflicts, to enhance the protection of cultural heritage as a central factor in the objectives of sustainable development, cultural diversity, and to promote quality as an objective when carrying out modern interventions in the environment, without compromising its existing values, etc.*<sup>25</sup>

In reaction to violent actions against notable public buildings, a significant social and professional community has formed. After years of being overlooked, heritage and the conservation profession have gained prominence. Experts have responded decisively regarding the General Staff complex and the Belgrade Fair, and students have shown an understanding of the situation. A group of students from the Faculty of Architecture and the University of Arts, where conservation education is provided, regular lectures has been organising for months, occurring once or even twice weekly, highlighting the value and significance of heritage, with a focus on the General Staff. Members of the ICOMOS Serbia National Committee actively participate in this initiative.

<sup>23</sup> The acting directors of the Republic and the City of Belgrade's Institutes for the Protection of Cultural Monuments pleaded guilty to documentation forgery.

<sup>24</sup> The Society for the enhancement of Vračar, The Society for improvement and enhancement of Krunski venac, The Society for the Neimar preservation, and The Topolska Street Society are active in the historic central Belgrade.

<sup>25</sup> *The Faro Convention.* (2005). Council of Europe. Articles 3, 5, 8. <https://www.coe.int/en/web/culture-and-heritage/faro-convention>

The banner featuring the stepped edges of two General Staff buildings facing one another has become a symbol of heritage protection.

Simultaneously with the campaign for saving the General Staff and the Belgrade Fair during the last months, some other valuable structures were destroyed. Not the registered monuments of culture, but significant Belgrade landmarks, such as the Old Sava Bridge or the Hotel Yugoslavia. The Belgrade Waterfront project has arrived right in front of the entrance to the Belgrade Fair complex, endangering also the Topčider Park and the Old Sugar Factory, as well as the New Belgrade urban area on the opposite riverbank. It is clear that there are intentions to spread generic architecture throughout Belgrade with the aim of “embellishing” its cityscape, neglecting the values of the historic urban fabric. The planned heritage sacrifice entails the total destruction of the General Staff complex, as suggested by the proposed towers for the Dobrović ensemble site and a large portion of the Belgrade Fair. Nevertheless, this does not deter the ongoing struggle for heritage.

### **Conclusions**

Considering these points, it can be concluded that the Republic of Serbia has remained in a transitional phase for twenty-five years since the war in the former Yugoslavia. Although it has signed or re-signed various international documents and agreements, it has failed to create a system that effectively recognises, preserves, and manages its heritage.

Recent testimonies to the history of architecture, including masterpieces, are attracting increasing public attention and conservation interest worldwide. Lesser-known 20th-century creations, particularly those from the Interwar Period and from the 1960s to the 1990s, are also drawing growing public interest and conservation efforts. At the same time, we are witnessing a rise in the destruction of 20th-century buildings in Belgrade and other cities in Serbia. Our daily efforts to combat these threats are proving ineffective or have only a marginal impact. Each day presents new challenges.

Thus, general globalisation leads to the destruction of identity everywhere, particularly in less wealthy countries that face numerous existential challenges. (Fig. 10) The Faro Convention, along with many other significant doctrinal texts, may illuminate our path but cannot save historic buildings, even with well-organised institutions and well-trained professionals. Governments and politics prevail, not the experts. Harmonisation of law in culture with all other laws<sup>26</sup>, specifically the Law on planning, construction, transportation, and infrastructure, including a thorough restoration of the legal provisions, is essential if Serbia intends to safeguard its cultural heritage and identity.

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<sup>26</sup> The Republic Institute has amended the Law on Planning and Construction, along with its bylaws in recent years, to promote fairness and accuracy, showing a true commitment to safeguarding cultural heritage. Moreover, the Working Group responsible for drafting the Law on Cultural Property submitted the draft to the Ministry of Culture in early 2024. Crafted by experts in the field, the draft includes all essential elements needed for the effective and lasting protection of the monument fund. Unfortunately, the documentation is still under review.

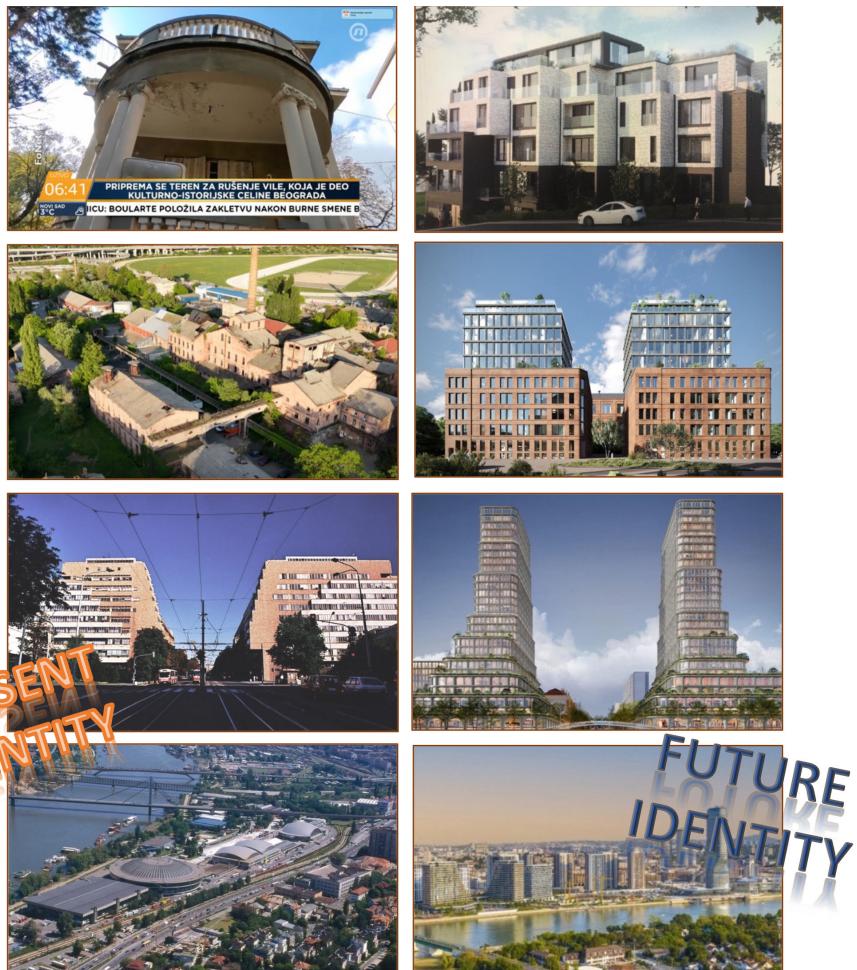


Fig. 10. The state of the art of the villa at Hadži Milentijeva St. No 72 in Vračar in 2022, along with the present condition of the Old Sugar Factory, the General Staff complex, and the Belgrade Fair complex, as well as all sites envisioned by architects and developers. Source: Authors, based on visual material from various sources (see lists of references and figures). 10.03.2025

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