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EUROPA NOSTRA

# 7 Most Endangered 2025

Programme run by **Europa Nostra**,
the European Voice of Civil Society Committed to Cultural Heritage,
in partnership with the **European Investment Bank Institute**

# Castle of Monemvasia, Greece

# Technical Report

*"αισθητικά θα κυριαρχεί – ουσιαστικά δεν θα εξυπηρετεί"*
("it will dominate aesthetically – while serving little practical purpose")
*Alexander Kalligas p.26*

## European Experts Team

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## September 2025

# Acknowledgements

The European Experts Team visited Greece from 10 to 23 July 2025. In Athens and Monemvasia, the team met with a range of stakeholders and representatives of civil society. Unfortunately, despite repeated requests, no meetings could be arranged with the Ministry of Culture in Athens or with the Municipality of Monemvasia.

The team is deeply grateful to all those who met with them and shared their perspectives. These exchanges provided valuable insight into the concerns and attitudes surrounding the proposed cable car project. The team extends special thanks to the *Friends of Monemvasia Association* for organising the visit of the Upper Town.

Close collaboration was maintained with the Greek Society for the Environment and Cultural Heritage (ELLET), the nominator of this site for the 7 Most Endangered List 2025. This included extensive review of documentation, supported by an internet-based literature survey. ELLET's assistance was instrumental in identifying and verifying relevant national legislation and other Greek documentary and procedural sources. In particular, the team warmly thanks Stavroula Thravalou of ELLET for her invaluable coordination and dedicated support in matters of documentation and logistics.

In addition to footnotes, references are embedded in the Report in the form of links. These point to specific sources, statements or paragraph sections. Any omissions are entirely unintentional and the result of oversight alone.

Front cover photo: Ministry of Culture, Press release 03.01.2023

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# 1. Summary

The Castle of Monemvasia, a site of exceptional historical and cultural significance, is the subject of a proposed intervention involving the installation of a cable car system to improve access to its Upper Town. This proposal, promoted by the Ministry of Culture under its wider programme for universal accessibility to heritage sites, has prompted concerns about its incompatibility with the archaeological and environmental integrity of the site.

Europa Nostra selected the Castle of Monemvasia for the 2025 edition of 7 Most Endangered Programme run in partnership with the European Investment Bank Institute. A European experts team visited the site in July 2025, meeting with stakeholders in Athens and Monemvasia, conducting a field assessment, and reviewing the available documentation.

The team recognises and supports the Ministry of Culture's commitment to facilitating access for persons with disabilities. However, it found that the specific cable car proposal – due to its scale, design, and location – raises serious concerns regarding visual intrusion, archaeological disruption, and irreversible impact on the natural rock formation and landscape. The concern lies not with the objective of accessibility, which is fully endorsed, but with the appropriateness of the proposed technical solution.

Additional concerns relate to limited transparency and public participation surrounding the planning and approval process. Stakeholders, including local and international civil society groups, have pointed to gaps in documentation, lack of clarity in procedural decisions, and inadequate public consultation. The absence of engagement from institutional stakeholders such as the Ministry of Culture and the Municipality during the field visit contributed to a perception of lack of engagement with the local community and experts.

The Environmental Impact Assessment (EIA) has been criticised for its lack of clarity, lack of a carrying capacity assessment, insufficient alternatives analysis, and methodological gaps. Observations by the National Natural Environment and Climate Change Agency (ΟΦΥΠΕΚΑ) further highlighted concerns about the robustness of the EIA.

Despite these challenges, the mission on-site confirmed the possibility of implementing lower-impact alternatives to achieve accessibility goals. These may include an alternative technical solution accompanied with thorough archaeological investigations and restorations, improvements to existing historic

footpaths and pathways, minor infrastructure enhancements, and guided access arrangements – all consistent with the site's heritage status.

The European experts team urges a collaborative and inclusive process going forward, in order to identify a sustainable solution that meets accessibility needs while upholding the integrity of the site's cultural and natural heritage.

It is important to stress that the appraisal does not oppose the principle of accessibility for persons with disabilities – on the contrary, it fully supports it as a matter of social justice and inclusion. The concern raised is with the scale and visual/archaeological impact of the specific cable car proposal. The team believes alternative, less intrusive solutions should be sought.

## 2. Conclusions & Recommendations

The mission confirmed the exceptional cultural, archaeological, and natural significance of the Upper Town of Monemvasia. While the goal of improving accessibility is fully supported, concerns remain about the scale, visibility, and potential irreversible impact of the proposed cable car system.

The European experts team recognises the importance of making heritage sites accessible to all, including persons with disabilities. However, such efforts must be carefully balanced with the responsibility to preserve the integrity of protected cultural sites. The Upper Town of Monemvasia remains largely unexcavated, and the installation of heavy infrastructure could jeopardise its unique character and archaeological value.

The current project, due to its size and design, risks undermining the very qualities that make the site exceptional. Stakeholders across civil society, including local residents and international supporters, have expressed concerns not against accessibility, but against a project of this scale and type being imposed without adequate transparency or consultation.

Alternative technical solutions that are more proportionate, reversible, and environmentally sensitive should be urgently considered to fulfil the accessibility objectives without compromising the site's heritage.

Recommendations

1. Suspend construction of the cable car until all pending legal and procedural issues are resolved and a comprehensive review of alternatives is undertaken;
2. Initiate a transparent and inclusive consultation with local communities, civil society, experts, and relevant national and international organisations;
3. Conduct archaeological investigation in the areas impacted by any intervention, prior to the design of the interventions;
4. Conduct a full alternatives analysis, including lower-impact technical solutions specifically designed for persons with disabilities;
5. Keep the original access route to the Upper Town as the principal itinerary and study a less impactful solution for people with reduced mobility;
6. Prioritize interventions to improve accessibility through the original route, such as handrails, side ramps, reduce slippery ground;
7. Ensure publication and accessibility of all archaeological, technical and environmental studies, particularly where public funding is involved;
8. Carry out a comprehensive carrying capacity and landscape impact assessment, considering the site's protected status and outstanding universal value;
9. Protect unexcavated archaeological areas in the Upper Town through non-invasive approaches that preserve future research opportunities;
10. Explore UNESCO Nomination Potential: Safeguard the integrity of the site in light of its proposed inclusion in Greece’s tentative list for UNESCO World Heritage nomination;
11. Strengthen inter-agency collaboration, including the Ministry of Culture, local authorities, and independent heritage organisations, to ensure a balanced outcome that integrates accessibility, heritage protection, and community development;
12. Consider the principles suggested in the Annex 1 of this document.

To this end, the team remains open to dialogue and cooperation with the competent services of the Ministry of Culture, as already proposed in the letter addressed to the Minister on 25 June 2025 (see annex).

## 3. Location – Purpose

The Castle of Monemvasia, perched on a limestone rock that juts into the Aegean Sea from the Southeastern coast of the Peloponnese, located in the Municipality of Monemvasia, Prefecture of Laconia, Greece.

The Ministry of Culture is promoting archaeological sites and areas of natural beauty. In line with the UN Convention on the Rights of Persons with Disabilities – ratified by Greece and incorporated into the national Constitution[1] and legal framework[2] – the programme aims to ensure universal accessibility. As part of this programme, the Ministry of Culture launched a project to install a cable car to facilitate access to the Upper Town in Monemvasia.

The purpose of the inclusion of the Castle of Monemvasia on the 2025 List of the 7 Most endangered programme is to express concern and raise the awareness regarding the scale and technical characteristics of the proposed project, which the European experts consider incompatible with site's designated protection status[3]. Following its mission to Monemvasia, the European expert team believes that alternative, less invasive technical solutions are available. These could meet the accessibility needs of persons with disabilities while safeguarding the site's archaeological integrity and outstanding natural landscape.

Europa Nostra and its experts fully supports the Ministry of Culture's commendable programme, including the project to improve access to the Upper Town of Monemvasia. Europa Nostra and its experts remain ready to engage in constructive dialogue with the Ministry's services, as already proposed in its letter to the Minister of 25 June 2025.

## 4. History and Cultural Heritage

The rock of Monemvasia was separated from the mainland by a major earthquake in 375 AD. It is now connected to the Peloponnesian coast by a

[1] Article 21, Paragraph 6 (As amended by the 2001 constitutional revision)
"Persons with disabilities are entitled to benefit from measures ensuring their self-sufficiency, professional integration, and participation in the social, economic, and political life of the country."
(«Τα άτομα με αναπηρίες έχουν δικαίωμα να απολαύουν μέτρων που εξασφαλίζουν την αυτονομία, την επαγγελματική ένταξη και τη συμμετοχή τους στην κοινωνική, οικονομική και πολιτική ζωή της Χώρας.»)

[2] Law 4074/2012 ratified UNCRPD, Law 4488/2017 aligned national legislation, Law 4759/2020 set further building and urban-planning standards

[3] As listed *in extenso* in Council of State Suspensions Committee decision 94/2025, article 5.

narrow causeway some 400 m long, which was cut in the late 19th century to allow for a bridge crossing (Encyclopedia Britannica).

The name Monemvasia derives from the Greek phrase *moni emvasis* (μόνη έμβασις) – meaning "single entrance" – a reference to the fortress town's sole point of access. The rock measures roughly 1.5 km in length and up to 600 m in width, rising steeply to about 200 m above sea level. The terrain is rugged and arid, with sparse vegetation and virtually no natural freshwater sources.

The surrounding region has been inhabited since prehistoric times. Just north of Monemvasia lies the site of ancient Epidaurus Limera, which flourished during the Roman period. The 2nd century Greek traveller and geographer Pausanias visited the area and noted that opposite the city was a promontory he called *Akra Minoa* – Cape of Minos – suggesting that the location may have served as a Minoan trading post.

The origins of the Castle of Monemvasia date to the 6th century AD, when the inhabitants of Ancient Sparta, which was then known as Lacedaemon, fled Slavic and Gothic invasions. According to the later *Chronicle of Monemvasia*, Sparta was abandoned after a Slav raid in 587-588 and fortified under the leadership of their bishop in Monemvasia. However, archaeological findings, such as the first level of the basilica church of Christ Elkomenos in the center of the Lower Town place the foundation of Monemvasia a few decades earlier, during the reign of Justinian[4].

From the 7th century onwards, unlike many other settlements in the Peloponnese that experienced decline, Monemvasia developed into a thriving commercial and cultural centre, thanks to its strategic position along key maritime routes. Its location on the sea lanes to the eastern Mediterranean made it the target of both pirate attacks and incursions by Western rulers. Beginning in the 9th century, Arab raids intensified, particularly after the establishment of the Emirate of Crete.

During the 11th and 12th centuries, under the Komnenos Byzantine Emperors, it flourished economically and militarily, with major churches like Agia Sophia and Christ Elkomenos being rebuilt. It served as a naval station in the wars against the Normans who invaded the area in the 12th century. In 1147, it repelled a Norman attack led by Roger II of Sicily.

[4] *Kalliga, Charis (2010). Μονεμβασία: Μια βυζαντινή πόλις-κράτος [Monemvasia: A Byzantine City-State] (in Greek). Athens: Potamos.*

After Constantinople fell to the Fourth Crusade in 1204, it was the last Byzantine stronghold in the Peloponnese. After a two-year siege, Monemvasia was captured by the Franks in 1252 and became a Latin bishopric. In 1262, Emperor Michael VIII Palaiologos recovered the city from William of Villehardouin. The city was granted extensive privileges under the Palaiologoi, such as tax exemptions and local autonomy. Its "golden age" followed, marked by prosperity and spiritual life. It thrived on maritime trade, including olive oil, local products, and especially *Malvasia* sweet wine, exported widely to Europe. However, it faced attacks by pirates like Roger of Lauria (1292) and hosted various foreign powers, including the Catalan Company.

The late Byzantine and early Ottoman periods were marked by political instability. After fluctuating between Greek, Latin, and Turkish control, Monemvasia was offered to Pope Pius II in 1460. It passed to the Venetians in 1463 but fell to the Ottomans in 1540. Under Ottoman rule, the Upper Town was largely abandoned. Venetian attempts to retake it in the 17th century largely failed, though Francesco Morosini briefly succeeded in 1690. After another Ottoman reconquest in 1715, Monemvasia enjoyed modest prosperity, with some population recovery and the establishment of a Greek school.

Monemvasia played an early role in the Greek War of Independence. It was the first fortress liberated in the Peloponnese after a four-month siege on 23 July 1821. Internal disputes and civil conflict, however, hampered its continued significance. After independence, the town declined sharply. The 1828 census counted just 659 residents, and many buildings were in ruins.

Despite efforts to revive the town, Monemvasia's population steadily declined throughout the 20th century, with many residents relocating to Gefyra on the mainland across the causeway. In the years following World War II, the historic settlement was largely abandoned. It was thanks to the determined efforts of a small group of remaining inhabitants that Monemvasia avoided being designated a protected archaeological site – like Mystras in nearby Sparta – which would have prohibited new construction and residential use. Until 1964, houses in the Kastro, the Lower Town, still relied on rainwater cisterns for water, and it was only in 1974 that the town was connected to the electricity grid.

From the 1970s onward, Monemvasia began to flourish once again. A turning point came in the late 1960s with the fortuitous visit of Alexandros and Haris Kalligas, renowned Greek architects who, captivated by the beauty and historical significance of the site, undertook the restoration of traditional houses with deep respect for both architectural integrity and archaeological conservation.

Over the years, they restored ninety buildings and documented an additional seventy. Their tireless efforts not only played a key role in the revival of Monemvasia but also earned them widespread recognition from the scholarly community, including the Europa Nostra medal for architectural restoration in 1981.

In sum, Monemvasia is one of Europe's oldest continuously inhabited fortified settlements. With a rich and layered legacy of a Byzantine stronghold and a medieval trading port, it has retained its historic character while evolving into a vibrant destination for cultural tourism. Much of the medieval infrastructure has been carefully restored and converted into residential houses, boutique hotels, artisan shops, and cafés. Leisure and tourism are now the primary economic driver. Although its population has grown to around 1,290 – most of whom reside on the mainland in Gefyra – Monemvasia's legacy as a maritime fortress and cultural landmark remains central to its identity. Today, it stands as a model of heritage preservation, combining its dramatic natural setting with its outstanding archaeological and historical significance.

## 5. The Cable Car Project

Background

Following the successful installation in 2020 of a modern inclined elevator for persons with disabilities at the Acropolis – replacing an earlier platform-type lift – the installation of an elevator to access the Upper Town was first announced during the visit of the Minister of Culture on 23 July 2021 to mark the bicentenary of Monemvasia's liberation at the start of the Greek War of Independence.

A subsequent ministerial decision[5] formalised the announcement, based on a proposal by the Municipality of Monemvasia[6] to install an aerial elevator (εναέριο αναβατόριο) in a location along the approach road just before the main western gate of the Lower Town. The proposed installation would essentially replace a temporary lift that had been used to transport equipment and building materials for restoration works on the Upper Town. Although the temporary lift was unsuitable and unsafe for passenger use, the request from visitors to access the Upper Town led to the consideration of a permanent passenger elevator. The chosen location was considered the least intrusive and immediately visible within

[5] Decision 452351/23.09.2021 Minister of Culture (ΑΔΑ ΨΕ754653Π4-8ΩΒ)
[6] Document ref. no. 5008/22.04.2021 Municipality of Monemvasia

the landscape. However, a subsequent geomechanical study identified a different location, which was then confirmed by a ministerial decision[7] reiterating the choice of an aerial elevator, i.e. a cable car.

A later decision approved the project entitled "Supply and installation of an elevator for the Castle of Monemvasia", designating the Municipality of Monemvasia as the implementing authority[8]. The project was included for financing under the Recovery and Resilience Fund[9,10], with the Ministry of Culture designated as the Ministry in Charge. The project was also included in the Public Investment Programme[11].

There is no available documentation explaining how or why the rock of Momenvasia was selected for this intervention. In light of the Minister of Culture's recent statement that "*At the moment, the Ministry of Culture has made accessibility one of its policy priorities. There are more than 150 sites across Greece where accessibility projects are being carried out—many of which are not without difficulty. A characteristic example is the Upper Town of Monemvasia."* it would be reasonable to expect that the selection of sites is based on formal criteria. These should include cost-benefit analysis, prioritisation frameworks, and clear justification to ensure that scarce public resources are allocated efficiently and transparently.

Technical Description

The following summary of the project is based on the published tender documentation[12] and publicly available information, including references to the final approval by the Central Archaeological Council (ΚΑΣ). The approved final design itself or any earlier designs have not been made publicly available.

[7] Decision 380223/04.08.2022 Minister of Culture (ΑΔΑ 6ΣΙΞ4653Π4-ΗΙΒ)

[8] Decision 553624/11.11.2022 General Director of Antiquities and Cultural Heritage, Ministry of Culture (ΑΔΑ ΩΤΦΩ4653Π4-52Γ)

[9] Decision 185395/19.12.2022 Alternate Minister of Finance (ΑΔΑ ΨΨΖΩΗ-ΦΕΤ)

[10] See Annex III - the Recovery and Resilience Fund (RRF)

[11] Decision 127738/30.12.2022 Deputy Minister of Development and Investments (ΑΔΑ 687946ΜΤΛΡ-ΙΘΝ)

[12] 24PROC014372797 2024-03-06

The project will affect an area of approximately 31 hectares. It consists of two main components:

a) installation of the cable car system (red rectangle), and
b) accompanying works at the Upper Town (yellow rectangle).

a) The cable car aims to provide safe and easy access to the Upper Town of Monemvasia, particularly for persons with mobility impairments.

The departure station and reception area will be located on the southern side of the rock, approximately 150 meters before the main gate to the Lower Town. The site will be accessible by private vehicles and tourist coaches and was selected to minimise traffic congestion near the main gate.
An initial design (472.7 m², dimensions 29.0 × 16.3 m, height ~13.5 m) was revised in the final plans to 233.20 $m^2$, dimensions 21.20 × 11 m, height 12.5 m. The structure will be in reinforced concrete, clad in stone, and semi-underground to integrate with surrounding terrain.
Access from the road will be facilitated by stairs and a ramp.

The arrival station will be located on the edge of the Upper Town wall, with a footprint of approximately 161.5 m² (17.0 × 9.5 m). Its height is unspecified. The design features a rectangular stone façade with metal roof supported by stone walls, intended to blend with the Upper Town wall. The upper platform will also serve as a panoramic viewing balcony.

The travel distance will be approximately 155 m (about 120 meters horizontal and 90 meters vertical). The three pylons envisaged in the initial design were reduced to a single one projecting above the Upper Town wall. Each of the two cabins will accommodate 15 persons, or 2 wheelchairs with two attendants, or 1 stretcher with 2 paramedics.
The travel time will be less than one minute per trip, ensuring a transport capacity of about 160 persons per hour.
The system will operate without onboard staff, with a single operator at each station.

b) The works at the Upper Town include the restoration of part of the superstructure of the Upper Town wall, adjacent to the arrival station; and,
The construction of a network of accessible routes for persons with disabilities, currently being implemented by the Ephorate of Antiquities of Laconia.

The paths will link the arrival station with key monuments, including the church of Agia Sophia, the gate and central square at the top of the footpath connecting with the Lower Town, the Ottoman bath complex and two restored buildings within the Upper Town.

Cost & Funding

The Technical Data Sheet, Annex II of the decision which included the project for financing under the Recovery and Resilience Fund[13], provides the following cost summary:

| | RRF Contribution (EUR) | PIP Contribution (24% VAT) | Estimated Budget (EUR) |
|---|---|---|---|
| Municipality of Monemvasia (cable car system) | 4,650,000.00 | 1,116,000.00 | 5,766,000.00 |
| Ephorate of Antiquities of Laconia (ancillary works) | 563,559.02 | 69,800.98 | 634,360.00 |
| Directorate for the Restoration of Byzantine and Post-Byzantine Monuments | 322,580.65 | 77,419.35 | 400,000.00 |
| Total | 5,537,139.67 | 1,263,220.33 | 6,800.360.00 |

The cost of the cable car system, as stated in the signed contract, is € 4,640,700.00 excluding VAT – see Procurement section below. A more detailed breakdown is provided in the minutes of the Municipal Committee of Monemvasia concerning the acceptance of deliverables[14]. While it is difficult to definitely assess whether the investment cost is justified, international benchmarks and high-level comparisons suggest that the amount falls broadly within a reasonable range for such a custom-designed, short-distance cable car project. However, for context, a post on the Onassis Foundation website notes that the cost of the inclined elevator installed at the Acropolis was less than €1.5 million – though this figure appears low and may refer only to the equipment, excluding associated infrastructure and installation costs.

[13] Decision 185395/19.12.2022 Alternate Minister of Finance (ΑΔΑ ΨΨΖΩΗ-ΦΕΤ)

[14] Excerpt from Minutes No. 29 / 02-12-2024, Decision No. 264/2024 Municipality of Monemvasia

Implementation

The project is implemented through a "Programmatic Contract for Cultural Development" signed on 18 March 2023 by four entities: the Ministry of Culture, as the lead authority; the Region of Peloponnese, providing regional oversight; the Municipality of Monemvasia, as the implementing body; and the Local Government Development Organisation "Parnon", ensuring key coordinating services and technical support.

Procurement

On 23.10.2023, the Municipality of Monemvasia launched a call for tender for the cable car system (reference number 15886), selecting the "design-build" procedure, which provides for the simultaneous assignment of both design and construction tasks with the aim of accelerating project implementation.

The "design-build" approach allows works to begin before final plans are completed, potentially shortening the overall timeline. However, it also entails trade-offs, including reduced design oversight – as evidenced by the revisions to the departure station layout and the number of pylons – limited competition on design quality, and a greater risk of compromise on construction or architectural standards. The design-build model further requires the contracting authority to define detailed technical specifications and performance requirements upfront to avoid ambiguity during execution.

The initial tender procedure was subsequently annulled[15] and a new call for tender was issued on 06.03.2024 (reference number 3317[16]). The contract was ultimately awarded to a consortium of two companies[17], which was the sole bidder. It was signed on 23.07.2024[18] between the Municipality of Monemvasia and the contractor consortium for the supply and installation of the cable car, with a total value of € 5,754,468.00 including VAT.

The two companies of the consortium comprise "Monte Noulikas", a firm specialising in ski lifts and custom technical systems covering rural tourism

[15] Decision 100/2024 of the Hellenic Single Public Procurement Authority (ΕΑΔΗΣΥ), following a pre-contractual appeal submitted by an interested economic operator, on the grounds that the contract to be awarded had been classified as a works contract, whereas it was in fact a mixed contract for supply and works, with the main object being the supply.

[16] 24PROC014372797 2024-03-06

[17] Decision 114/2024 Municipality of Monemvasia and Minutes 13/28.03.2024 Municipal Committee (ΑΔΑ 6ΜΟΔΩΚ9-2ΞΨ)

[18] 24SYMV015173988 2024-07-23

infrastructure and urban mobility systems, and "Kontos Concreate" (also known as Kontos Concrete), which is active in heritage-related infrastructure projects. The Monemvasia cable car appears to be Noulika's first project of this kind. Kontos Concreate was previously involved in the installation of rockfall protection barriers above the Lower Town of Monemvasia.

Timetable

The original timetable, as set out in the Technical Data Sheet, Annex II, of the decision approving the project for financing under the Recovery and Resilience Fund[19], indicated that the cable car project was to start on 16.01.2023 and be completed by the end of 2025. Failure to meet this deadline would result in the withdrawal of RRF funding. However, the RRF funding deadline has since been extended to the end June 2026, with a possible further extension to end 2026, provided certain conditions are met – including the requirement that more than 50% of the project's physical implementation has been completed.

Due to accumulated delays, the final design was only approved by the Central Archaeological Council (ΚΑΣ) of the Ministry of Culture on 15.04.2025. Given the "design-build" model adopted for the project, further design modifications during implementation cannot be ruled out[20]. The unanimous approval by ΚΑΣ formally authorised construction to proceed. However, by that date, only an exploratory drilling had been carried out at the departure station site. At the time of the mission on-site, restoration works on a section of the wall's superstructure adjacent to the planned arrival station in the Upper Town had since been completed, and initial clearing of the access paths had begun.

On 10.06.2025, the Council of State Suspensions Committee (ΣτΕ) issued Decision 94/2025, ordering a temporary suspension of all works related to the cable car project. The outcome of the pending court rulings – scheduled for 24.09.2025 – will determine whether construction may proceed. Until then, all works remain legally suspended, pending the adjudication of annulment appeals filed by stakeholders, including ELLET, the Nominator of the Castle of Monemvasia for the 2025 List of 7 Most Endangered sites in Europe, the *Friends of Monemvasia Association*, and others. The appeals seek to overturn: a) the decision of the Region of Peloponnese approving the Environmental Terms Approval Decision (ETAD) – see Environmental Impact Assessment section; b)

[19] Decision 185395/19.12.2022 Alternate Minister of Finance (ΑΔΑ ΨΨΖΩΗ-ΦΕΤ)

[20] As noted by one participant during the meetings, and repeated in the ICOMOS press release, there is a risk of a "βλέποντας και κάνοντας" approach – or, in English, of proceeding with an unclear plan – leaving the project vulnerable to unforeseen complications and additional delays during its implementation.

the Ministry of Culture's decision endorsing the EIA; and, c) the Municipality of Monemvasia's award of the design-build contract to the consortium – see Procurement section.

Even if the suspension is lifted, it is doubtful that more than 50% of the project can be completed by the end June 2026, given the limited progress to date. In these circumstances, RRF funding may be withdrawn, compromising the full execution of the project.

Environmental Impact Assessment

On 01.04.2024, the Region of Peloponnese announced the posting of the Environmental Impact Study on its official website. The EIA file (reference number 16141/21.02.2024) was submitted by the Directorate of Environment & Spatial Planning of the Peloponnese – Department of Environmental & Spatial Planning. The public, interested stakeholders, municipal and local community committees were invited to review the file and submit their comments or opinions within a one-month consultation period ending on 01.05.2024

The Ministry of Culture and the Region of Peloponnese approved the EIA study with respective decisions on 17.05.2024[21], with the Ministry of Culture amending its decision on 05.07.2024[22]. It is alleged that the Natural Environment & Climate Change Agency (ΟΦΥΠΕΚΑ) has not signed-off the EIA study.

The EIA study has been the subject of strong criticism – for example, "*the issues that are expressed in vague and insufficient generalities across the 180 pages*"[23]. The Non-Technical Summary states that the project is not located within areas covered by urban planning instruments or Residential Control Zones (ZOE), yet fails to acknowledge that a comprehensive Management Plan is currently being developed for Gefyra and the Lower Town. The study places emphasis on tourists and residents rather than persons with disabilities, downplays the potential for induced traffic, and omits reference to concerns raised by ΟΦΥΠΕΚΑ. These concerns have been summarised as pointing to an apparent lack of thoroughness and preparation, with methodological weaknesses and gaps in supporting evidence – raising questions about the overall robustness of the EIA[24]. Moreover, given the site's protected status, an assessment of its

[21] Decision 32/17.05.2024 Region of Peloponnese (ΑΔΑ ΨΣΕΨ7Λ1-4Α4)

[22] Decision 215876/17.05.2024 amended 05.07.2024 Ministry of Culture (ΑΔΑ ΨΕΘΘ46ΝΚΟΤ-3ΣΧ)

[23] ICOMOS Press Release, 26.04.2024

[24] Antonis Kotsonas, Associate Professor of Mediterranean History and Archaeology at New York University, Voulis TV 24.05.2025, Watch on YouTube at 01:08:50

carrying capacity and the potential impact of the project would have been appropriate in order to inform more effective and preservation-focused decision-making.

The Region of Peloponnese, Department of Environmental and Spatial Planning, approved the Environmental Terms Approval Decision (ETAD / ΑΕΠΟ)[25], which simply notes that ΟΦΥΠΕΚΑ has expressed reservations and, following the Ministry of Culture amended decision of 05.07.2024, adds "*Although the project is located within an archaeological site, no negative impacts are anticipated provided that the approved siting and provisions of Ministerial Decision no. 380223/4.8.2022*[26] *and Law 4858/2021 are observed.*"

Law 4858/2021 codifies and consolidates existing legislation for the Protection of Antiquities and Cultural Heritage in General, including Law 3028/2002 and its amendments, into a single, coherent legal framework. However, certain academic and policy analyses have pointed out that the law does not sufficiently incorporate procedural safeguards for stakeholder engagement and public participation. The law has also been criticised for reinforcing a centralised, top-down model of heritage governance, leaving limited room for civil society, local communities, and independent professionals to participate in decision-making[27].

In the case of the Monemvasia cable car project, the EIA procedure appears to have been formally adhered to. However, given the scale of the project and its potential impact on both the local community and the wider public – particularly in light of its implications for the archaeological site and a landscape of national heritage significance – additional measures would have been warranted. Beyond the formal one-month long posting of the EIA study on the Region of Peloponnese's website, a public consultation involving physical presence and direct engagement would have been appropriate. Furthermore, the ETAD / ΑΕΠΟ could have directly addressed the reservations expressed by ΟΦΥΠΕΚΑ.

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[25] Decision 44351/05.06.204 Region of Peloponnese, General Directorate of Spatial, Environmental and Agricultural Policy, Department of Environmental and Spatial Planning (ΑΔΑ ΡΗ1ΕΟΡ1Φ-ΣΞ1)

[26] See Background

[27] Markellou, M. Cultural Heritage Accessibility in the Digital Era and the Greek Legal Framework. *Int J Semiot Law* 36, 1945–1969 (2023).

Stelios Lekakis, Cultural policy and public engagement with modern architectural heritage in Greece: An empirical analysis

Ioanna Katapidi, The role of conservation policies in local understandings of heritage in living heritage places: a Greek testimony

G. Giannakourou, E.Balla, Historic and cultural preservation: the case of Greece, Berlin, 16-19 October 2024

Such an approach would have promoted a more inclusive and democratic process, avoiding the perception that key decisions are driven primarily by budgetary or policy objectives rather than by participatory deliberation rooted in cultural and heritage values.

To put in context the archaeological importance and the significance of the national heritage landscape of Monemvasia, it is worth quoting from Article 5 of Decision 94/2025 of the Council of State Suspensions Committee, which states:

"*Monemvasia has been attested as a settlement since the 6th century AD and, due to the exceptional significance of its architecture and monuments, is subject to a special protective status. In particular, by Royal Decree of 19.04.1921 (A' 68), Monemvasia (specifically, the Castle area along with its medieval structures) was declared a prominent Byzantine monument (Royal Decree of 25.02.1922 (A' 28)*" …

the text continues:

"*it was designated as an "archaeological site and historic preserved monument", including, among others, "the entire area of old Monemvasia", including the 'Bridge', that is, the narrow strip of land connecting Monemvasia to the mainland*" …

it further mentions:

"*It was designated as a "site of exceptional natural beauty and as a historic site"*"

Throughout it refers to successive decisions, and concludes:

"*Additionally, Monemvasia is located within the Natura 2000 network, specifically in the area with code GR2540001*." To which may be added that the rock of Monemvasia also forms part of the Corine biotopes[28] (A00010062) and has been partly designated a historically designated forest area[29].

Concerns also arise regarding the compatibility of the Monemvasia cable car project with the European Landscape Convention, adopted in Florence in 2000 and ratified by Greece in 2010 (Law 3827/2010). The lack of meaningful public consultation and the scale of technical infrastructure may be seen as inconsistent with the Convention's principles of landscape integrity, democratic engagement, and sustainable development rooted in heritage values.

The cable car project also appears to be at odds with the recently approved Regional Spatial Framework of the Region of Peloponnese[30], which includes Monemvasia amongst its Strategic Priority Proposals for nomination to the

[28] https://filotis.itia.ntua.gr/biotopes/c/A00010062/

[29] Decision 349098/2022 Ratification of the forest map for the entire Regional Unit of Laconia

[30] Government Gazette, ΦΕΚ Δ' 186/2025, pp. 1762, 1768

UNESCO World Heritage List. The project's scale and potential impact could jeopardise the site's eligibility for such a listing.

Of particular interest is a legal opinion prepared by a local lawyer, which argues that the State's constitutional obligation to protect the natural and cultural environment takes precedence over the need to ensure accessibility for persons with disabilities to archaeological sites, in cases where these objectives are in conflict – since Article 21, paragraph 6 of the Constitution does not provide for such an override.

The legal opinion further argues that, under the pretext of serving a public benefit – namely, improving accessibility for persons with disabilities – the project's underlying objective appears to be the promotion of large-scale commercialisation of the monument. The other stated purposes, such as facilitating emergency access or transporting materials for restoration works, are described as unsubstantiated. According to the study, the proposed installation – an oversized mechanical structure – would have the capacity to transport up to 160 persons per hour to the Upper Town.

The opinion concludes that there is no legal basis for the project as proposed. Specifically, it argues that neither existing legislation on the protection of antiquities and cultural heritage, nor Article 21 of the Constitution, provides grounds for such an intervention. Similarly, Article 100 of Law 3852/2010 – concerning cultural development programme agreements for the promotion, protection, and conservation of monuments – cannot reasonably be interpreted to permit the construction of a cable car of this scale, or the high-volume transport of visitors. On this basis, the relevant administrative decisions are considered to be legally unfounded.

Use, market, demand

Initial decisions approving the installation of the cable car, as well as related press releases, refer to an intended mixed use: transporting passengers, supporting emergency response and firefighting, and facilitating the movement of materials for restoration works. However, these functions are arguably not fully compatible in practice.

A later press release of the Ministry of Culture, refined the purpose and use stressing "*Universal accessibility to monuments and archaeological sites, especially those with high visitor numbers, is a priority for the Ministry of Culture and Sports … The cable car is intended not only to facilitate access to the Upper*

*Town … but also to allow persons with disabilities and, more generally, individuals with limited mobility to reach the particularly important monuments of the castle town … and now the cable car gives new momentum to tourism - especially in its special forms - as well as to an immersive cultural experience for all of us*."

With a further one adding "*The necessary interventions are being approached within the framework of a sustainable strategy for the development of the monumental and residential ensemble. According to the Environmental Impact Study, the project is expected to bring significant benefits, such as job creation, strengthening of the local economy…"*

Yet none of the publicly available documentation includes any effort to quantify the expected number of users. No estimates have been provided regarding projected passenger volumes or how use would be distributed across the various proposed functions.

For reference, the inclined lift at the Acropolis has a capacity nearly identical to that of the proposed cable car in Monemvasia and was designed for approximately 200 trips per day. It has proven effective in serving visitors with disabilities – estimated at around 10% of total visitors, or about 2,000 individuals per day during peak season – but appears to be reaching its operational limits and has experienced repeated breakdowns. Since 2023, to manage overcrowding during the peak season, the number of daily visitors to the Acropolis has been capped at 20,000 per day.

In contrast, no reliable data are publicly available for visitor numbers to Monemvasia. Based on rough estimates from local hotel sources, seasonal visitor numbers, say from May to September, may reach up to 200,000. This would suggest that even during peak periods or week-ends, daily visitor numbers are unlikely to exceed 2,000 to 3,000. Moreover, the vast majority of visitors are holidaymakers staying in the wider area, primarily drawn to the beaches, cafés, restaurants and the historic Lower Town. Only a fraction of them typically visit the historic monuments of the Upper Town. Assuming a similar proportion of visitors with disabilities as at the Acropolis – and even allowing for generous margins of error – it is doubtful that more than 200 or 300 persons would use the cable car on any given day. Given its transport capacity of approximately 160 persons per hour – see Technical Description section above, the system is likely to remain idle for extended periods, even at peak times.

Alternatively, the cable car could become a focal point of attraction in itself, drawing a disproportionately large number of visitors relative to Monemvasia's scale, including cruise ship day-trippers and domestic tourists. However, this scenario would conflict with current media coverage, which highlights that Monemvasia's appeal lies in its medieval character, cultural heritage, and scenic landscape – not in mass tourism infrastructure.

Some local traders may welcome the project in anticipation of increased numbers of visitors and business. Yet experience elsewhere suggests that cruise ship day-trippers tend to contribute minimally to the local economy, as most of their expenses are covered within pre-paid packages. In addition, the cable car's departure station located a distance from the Lower Town's gate would likely divert visitors away from its cafés, restaurants, and souvenir shops – potentially undermining rather than supporting local business.

Perhaps most critically, overexposure risks eroding the very qualities that make Monemvasia attractive in the first place. The town appears to be approaching its carrying capacity[31]. Any sharp increase in visitor numbers, as seen in other destinations facing overtourism, can degrade both the site's cultural character and visitor experience.

The narrow access road connecting the mainland to the gate of the Lower Town is already congested with traffic and lined with parked vehicles. Any additional traffic – particularly from tour coaches or shuttle vans bringing cruise ship passengers to the cable car departure station – would only worsen the situation. The current project design includes no provision for road improvements, nor would such modifications be permitted under the strict conservation status of the entire rock of Monemvasia – see Environmental Impact Assessment section above. Over time, such pressures could discourage the very type of visitor who contributes most sustainably to the local economy – those who stay longer, explore more, and spend more.

A solution truly aligned with the needs of persons with disabilities and limited mobility would involve an elevator designed specifically for that purpose – proportionate in scale, discreetly integrated into the historic landscape, and sensitive to the archaeological and visual context of the site. At the same time, access to the Lower Town should be improved. The narrow-cobbled alleyways and steps could be adapted to accommodate wheelchairs, and the extremely slippery cobblestones surfaces treated for safety. The historic footpath leading to

[31] Law 4967/2022 (Article 64) provides a definition for "carrying capacity", mandates its application, and calls for its integration into planning standards.

the Upper Town gate, with its winding ascent, should also be upgraded where possible, with the addition of handrails and rest points, and the possible use of mechanical chairlifts explored. Such improvements would encourage those who are able and willing to use the original access route, preserving an authentic experience of the site. Indeed, some archaeologists argue that engaging with the original route, with all its physical challenges, is integral to fully appreciating the site's heritage value.

In sum, an elevator tailored to real accessibility needs – rather than broader tourism development – would more faithfully reflect the Ministry of Culture's commitment that: "*culture, as a social good, must be accessible to all - whether elderly individuals, persons with limited mobility, or people with disabilities - so that everyone may participate equally in the cultural experience*." At the same time, it would promote a model of tourism that remains true to Monemvasia's medieval identity, cultural richness, and natural beauty – rather than one that risks eroding these very assets.

Operation and maintenance

The Technical Data Sheet, Annex II, of the decision approving the project for financing under the RRF[32] states that the Municipality of Monemvasia and the Ephorate of Antiquities of Laconia (ΕΦΑΛΑΚ) will ensure the operation of the project after its completion, using their respective personnel. Specifically, the Municipality of Monemvasia will be responsible for the maintenance and uninterrupted operation of the cable car infrastructure, whilst ΕΦΑΛΑΚ will oversee the maintenance and operation of the network of visitor pathways and the archaeological site in the Upper Town.

The cost breakdown of the cable car system, as recorded in the minutes of the Municipal Committee of Monemvasia regarding the acceptance of deliverables[33], includes €10,000 for training municipal personnel in the operation of the system, and €100,000 for two years of maintenance, including materials and consumables.

Based on the above – and in the absence of full technical specifications – only indicative annual operational and maintenance costs can be estimated drawing on comparable systems:

[32] Decision 185395/19.12.2022 Alternate Minister of Finance (ΑΔΑ ΨΨΖΩΗ-ΦΕΤ)
[33] Excerpt from Minutes No. 29 / 02-12-2024, Decision No. 264/2024 Municipality of Monemvasia

| Cost component | Indicative annual cost EUR |
|---|---|
| Maintenance, materials & consumables (cf. above) | 50,000.00 |
| Personnel (4-5 personnel, balancing operational roles and technical support) | 75,000.00 |
| Energy (Assumed 400kW x 10 trips/hr x 8 hrs/day x 300 days/yr x 0.15 €/kWh) | 12,500.00 |
| Administrative costs, insurance, contingencies, etc (indicative) | 12,500.00 |
| Total: | 150,000.00 |

It should be emphasised that the above cost estimates are purely indicative, based on prudent assumptions. Actual figures may vary. For instance, more personnel may ultimately be required, which would increase operating costs. Conversely, the cable car may operate for fewer hours or days throughout the year e.g. due to strong winds, which are frequent during the peak season and may render the system inoperable. While this would reduce energy costs, it would also mean that the cable car remains idle precisely when demand is highest.

There is yet no indication in the publicly available information as to how the operation of the cable car will be integrated into the Municipality of Monemvasia's regular functions, e.g. regarding the allocation or recruitment of personnel, maintenance contracts, or procedures for regular safety certification. It also remains unclear whether use of the cable car will be free of charge or subject to a fare, and if free, who would cover the resulting operational costs. However, the Municipality's 2025 Financial statement of revenue and expenditure suggests that the additional burden – barring exceptional costs, such as major breakdown – could potentially be absorbed without undue fiscal strain.

Locals have expressed concerns about the standard of public services in the Lower Town. Notable issues include the deteriorating quality of fresh water supply, inadequate sewerage infrastructure, and the discharge of treated wastewater into the sea rather than its reuse. In addition, the cobblestones in the alleyways and steps of the Lower Town, as well as those along the historic footpath leading to the Upper Town, are poorly maintained and untreated, raising safety concerns – see Use section above. The shuttle bus service between Gefyra

and the Lower Town gate is irregular, with the same vehicle also serving as a school bus.

Taken together, these shortcomings have led many locals to question the Municipality's capacity to properly operate and maintain a complex mechanical system such as the proposed cable car.

Economic review

The Ministry of Culture's rationale for the project aligns with its broader programme to ensure universal accessibility to archaeological sites and areas of natural beauty, as stated in its official decisions and related press releases already cited. No feasibility study or cost-benefit analysis has been made available to the public.

The Performance Requirements document, supporting the first call for tender – see Procurement section above, provides a qualitative justification for the project. It outlines a series of anticipated benefits resulting from improved accessibility to the Upper Town. The following highlights summarise its key points – but notably, they make no explicit reference to persons with disabilities:

- Easier access for both residents and visitors to the Upper Town, enhancing public engagement with a major cultural asset and supporting educational and heritage outreach at regional and national levels.
- Increased visitation and tourism activity, particularly in peak season, with positive economic impacts expected at the local level, especially in a community reliant on tourism.
- Creation of new jobs related to operation, maintenance, and support services, contributing to economic activity and social cohesion.
- Urban revitalisation and improved safety and comfort for all users. The cable car is also expected to support emergency needs and assist the local archaeological authority in its work.

A simple and straightforward cost-benefit calculation based on the figures present in this report (including investment cost, operation and maintenance costs, and projected use) suggests that, for the project to achieve a positive Net Present Value (NPV) at a 4% discount rate[34], a fare of € 5-10 per user would be required. This estimate depends on actual usage levels and fare policy -

[34] European Commission, *Economic appraisal vademecum 2021-2027 – General principles and sector applications*,

particularly whether persons with disabilities would use the system free of charge, and what proportion of total users they represent.

While a full economic appraisal could likely justify the project overall, the key issue is not whether the investment is justified in principle, but whether the cable car is the most appropriate technical solution for ensuring access to the Upper Town for persons with disabilities. The Social Return on Investment (SROI) metric might reasonably yield a ratio around 3:1 (i.e. €3 in social value for every €1 invested). However, once the impact on the archaeological site and the greater visual and environmental disruption caused by the cable car are taken into account, the project would probably rank lower than alternative solutions that are less intrusive and more compatible with the historic and natural landscape.

Within the Recovery and Resilience Fund, the project was registered under Measure 16735, which focuses on "Utilisation of art as a prescribed therapy for the promotion of social cohesion and the activation of the 'Silver Economy'"[35]. While this may partially align with the project's broader aims, it does not fully reflect the rationale stated in the initial decisions approving the cable car installation – namely, its intended mixed uses: transporting passengers, supporting emergency response and firefighting, and facilitating the movement of materials for restoration works. Moreover, under the section Project Milestones and Objectives, no quantitative indicators are provided. The emphasis is placed on the timetable for physical completion and the consequent absorption of financial resources. While this is not inconsistent with the provisions of the RRF Regulation, the absence of specific outcome-related metrics may risk limiting the project's overall social value and its alignment with the broader goals of accessibility and sustainability[36].

[35] SUB 1.2.2 Supply and Installation of a Passenger Elevator for the Monemvasia Castle and associated works

[36] Analysis "The EU Recovery and Resilience Facility falls short against performance-based funding standards" Bruegel, 06 April 2023

## 6. Mission on-site, July 2025

The European experts team visited Greece from 10 to 13 July 2024. During their visit, the team met with stakeholders and representatives of civil society at ELLET's offices in Athens, as well as in Monemvasia. Unfortunately, despite repeated requests, no meetings were held with the Ministry of Culture in Athens or with the Municipality in Monemvasia. While in Monemvasia, the team visited the Lower Town and was given a guided tour of the Upper Town, accompanied by an accredited guide and archaeologist.

As a result of the visit, the team gained valuable insight into the condition of the historic footpath leading to the Upper Town gate, recognising both the urgent need for its maintenance and the potential for low-impact upgrades. It appreciated the measured and respectful restoration works the Ministry of Culture has already undertaken, which enhance and promote the Upper Town without overwhelming its historic character. The team also noted that large sections of the Upper Town – of exceptional archaeological significance – remain unexcavated, and was concerned over the disruption that the construction of the cable car terminal station will likely cause. There was particular unease about the irreversible loss of archaeological evidence in areas that will be overbuilt with new infrastructure, such as access paths. Finally, the team observed with serious concern the permanent scarring the rock formation will suffer, an iconic natural feature that has remained largely untouched for centuries.

In the absence of engagement from key institutional stakeholders, namely the Ministry of Culture and the Municipality of Monemvasia, the perspectives of the project's proponents were primarily represented during the meetings by the *Union of Monemvasians Worldwide*, an NGO founded in 1918, a few local business representatives, and individual supporters of the cable car as currently proposed. By contrast, concerns were raised by a broad spectrum of civil society actors, including NGOs, such as ICOMOS and the *Friends of Monemvasia Association*, as well as both local residents and members of the international community. As a result, the team was more exposed to public opinion expressing reservations or opposition to the project.

Among the recurring themes raised in the meetings were the lack of transparency, limited public access to technical studies, and insufficient clarity surrounding procedural decisions. Several participants highlighted a breakdown in communication between authorities and the wider community, which has fuelled speculation regarding procurement processes, technical choices, and the origin of project components. Some stakeholders also described a climate of

pressure, suggesting that individuals may feel reluctant to express dissenting views openly. In response, the appraisal team noted that information related to public investment, particularly projects benefitting from EU funds, such as the RRF, should be publicly accessible. They therefore encouraged participants who felt that access to such information had been unduly restricted to consider referring the matter to relevant oversight institutions, including the Greek Ombudsman and, if appropriate, the European Ombudsman.

The absence of structured public consultation – beyond the formal online posting of documentation, such as for the EIA study – has further contributed to mistrust and, at times, to exaggerated claims and misunderstandings. Several individuals reported being unaware of project details or unsure how to express their views meaningfully. In such an environment, even well-intentioned initiatives may be perceived as top-down or politically driven.

Supporters of the cable car typically frame their arguments around principles of democracy, social cohesion, equal participation in public life, and universal access to cultural heritage. Local business representatives also welcomed the initiative, anticipating increased visitor numbers and economic activity – see Use, Market, Demand section above.

Opponents, by contrast, focus on the scale and technical characteristics of the proposed intervention and its impact on the archaeological site and surrounding landscape, both recognised as assets of significant national heritage. Their views have been integrated in the relevant sections of the report, as appropriate. They argue that alternative solutions, specifically designed to meet the needs of persons with disabilities and more proportionate in scale, could achieve accessibility goals while remaining sensitive to the site's archaeological integrity and visual character.

A telling comment came from Alexander Kalligas, the esteemed architect who, together with his wife Haris, pioneered the conservation and restoration of Monemvasia. Present throughout the meetings, he aptly observed: *"αισθητικά θα κυριαρχεί – ουσιαστικά δεν θα εξυπηρετεί"* ("it will dominate aesthetically – while serving little practical purpose"). His remark encapsulates broader concerns that the cable car risks visually overwhelming the site without delivering commensurate gains in accessibility.

The nomination of the Castle of Monemvasia to the 2025 edition of the 7 Most endangered programme was intended to draw attention to the scale and technical nature of the proposed intervention, which, however well intentioned, appears incompatible with site's designated protection status[37].

Europa Nostra and its experts fully support the Ministry of Culture's broader and commendable programme to promote universal accessibility to archaeological sites and areas of natural beauty. Following the mission to Monemvasia, the European experts team believes that less invasive and more context-sensitive technical alternatives are available. These could meet the accessibility needs of persons with disabilities while safeguarding the integrity and natural landscape of this unique site. To this end, Europa Nostra and its experts remain open to dialogue and cooperation with the competent services of the Ministry of Culture, as already proposed in the letter addressed to the Minister on 25 June 2025.

[37] As listed *in extenso* in Council of State Suspensions Committee decision 94/2025, article 5.

# Annexes

## I - Threatened Heritage and Landscape Assets

Monemvasia stands as a rare medieval settlement in Greece that is both a fortress and a town. This remarkable site, located in the southern Peloponnese, is an islet carved by a powerful earthquake in the 4th century CE. Its very existence is a blend of natural components and human history, with defensive walls, an Acropolis, and buildings that are organically part of the unique landscape.

As a vital part of a network of castle towns, including Mystras, Kardamyli, Methoni, and Koroni, Monemvasia is different in being organized in two distinct settlements, the lower and the upper town, connected through a steep and winding walkway. The lower town has been progressively transformed since the 1960s into a vibrant touristic site with charming streets, shops, and guesthouses, which still reflect the rich cultural Byzantine, Venetian, and Turkish background. The restoration of the houses, public and religious buildings and public space have been internationally recognized as one of the best examples of restoration/reconstruction of historic settlement. The upper town is an archaeological site, where only a few structures, like the Church of Agia Sophia, are preserved in their entirety and still in use.

Fig. 1 Annex. While the proposed cable car will be positioned on the southern side of the islet, keeping it out of sight from the mainland to the northwest (this picture), its impact will be highly visible. Located near the main gate and on the current access road, the new infrastructure will significantly compromise the visitor's initial experience of the rock, altering the view for those entering the lower town (Europa Nostra).

The identity of Monemvasia is inextricably linked to its dramatic natural setting. Rising between 150 and 200 meters above the sea, the upper settlement's boundaries are defined by the sheer rock face and slopes. Its geomorphological characteristics create impressive and unique visuals from both afar and up close, giving the impression of a solitary rock fortress seemingly untouched by time. The site's inaccessibility is a key part of its defensive genius, with only a single, winding access point[38], located strategically above the upper town, to remain included into the lower defence system. The vast majority of the rock remains steep and untouched, preserving its unique character. While archaeological traces of the upper town are concentrated on the southwest side and the Acropolis, the rest of the rock maintains its pristine, natural appearance, a fundamental element of the site's enduring allure.

Fig. 2 Annex. The winding cobblestone path is the only connection between the lower and upper towns, and it offers a fundamental understanding of Monemvasia's unique character and historical significance. With properly designed handrails and repairs to make it less slippery, this path could be made more accessible for tourists (Europa Nostra).

Despite its remarkable archaeological and historical significance, the Upper Town of Monemvasia has been surprisingly under-researched. Scientific publications are scarce, and archaeological reports are often generic, suggesting a vast, unexplored reservoir of information.

[38] Although the south access is the only way to reach the upper plateau, there is evidence of another possible access point on the north slope. This potential route was once protected by a stretch of walls known as the Mura Rosse.

Since the late 1950s, when restoration began on the Agia Sophia church, there has been a significant expansion of work. In 1995-96, following the collapse of a stretch of the fortification (1993), the wall was repaired and some archaeological investigation was conducted. EU-funded projects have focused on clearing vegetation, stabilizing walls, and repairing paths. More recently, large-scale initiatives have centered on the Agia Sophia church and the Central Gate complex, involving structural repairs, artifact conservation, and extensive archaeological excavations. During a recent field visit, it was evident that conservation work is also underway on several ruined structures located between the so-called House of the Kritikos and the Pallazzo, signaling a new era of proactive preservation.

Fig. 3 Annex. The rockfall barriers, as seen from the path to the upper town, create a jarring visual impact. The invasive metal anchors and modern materials stand in stark contrast to the historic character and traditional materials of the site (Europa Nostra).

Rockfall protection barriers, installed to safeguard the lower town, have recently introduced a jarring visual element. Their modern materials and stark appearance create an unfortunate contrast with the historic environment. The lack of a visual impact study during installation is particularly noticeable along the winding cobblestone path known as the “Voltes”. Here, the anchors and the structural supports embedded in the bedrock were designed as a typical infrastructure project, resulting in solutions inappropriate for their material and visual invasiveness, lacking the mandatory evaluation of their minimal impact and careful juxtaposition to the historic landscape.

With the proposed installation of a new cable car — a modern infrastructure project that will likely require similarly invasive solutions — it is essential to outline the potential alterations

and impacts of the infrastructure and associated works for the circulation of tourists, as well as the risk of irreversible damage to this heritage site. To date it is unclear the impact of the new construction on the archaeological evidence.

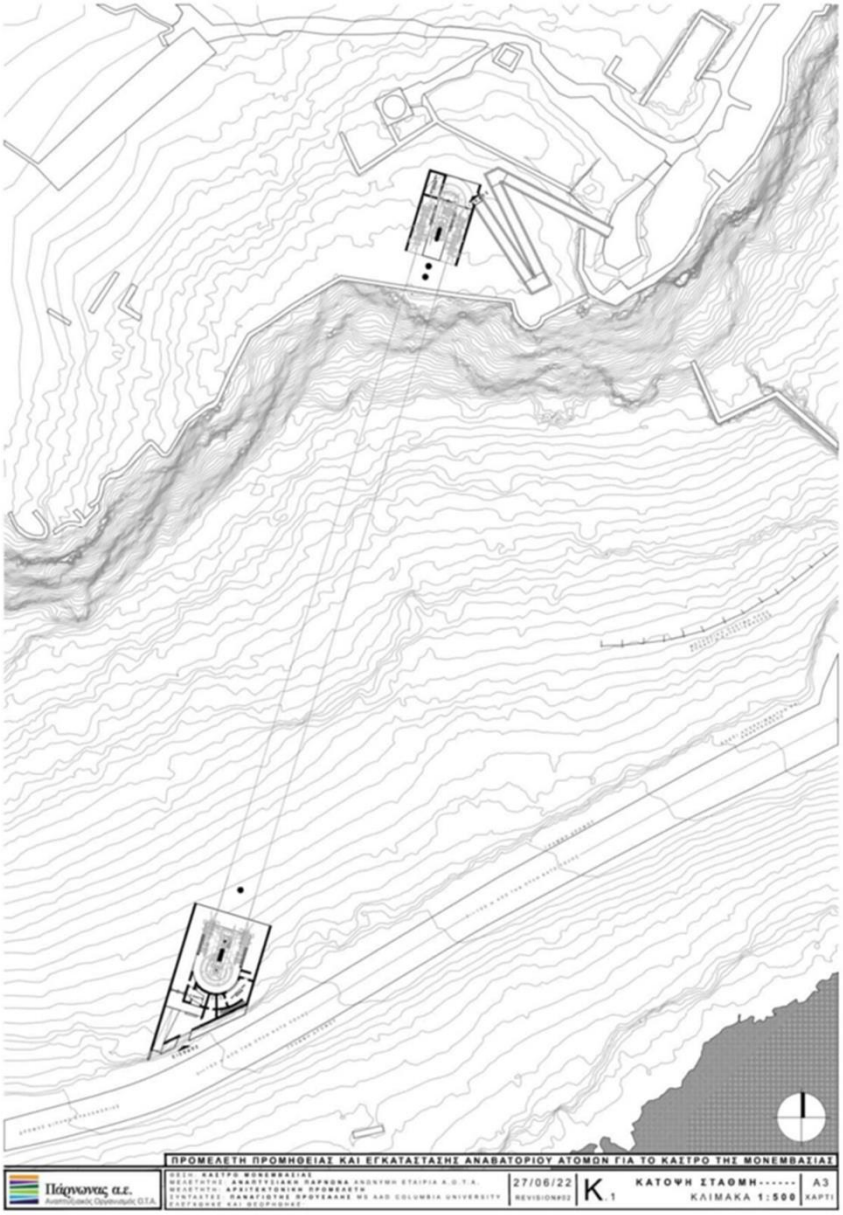


Fig. 4 Annex. Plan of the line of the cable car, the supporting pylons, the upper and lower stations,and the ramp by the upper station (shaped as a reverse N) (image after: https://www.trixilis.gr/deltia-typou/d-t-dimoprateitai-i-egkatastasi-anavatoriou-atomon-sto-kastro-monemvasias)

The cable car project entails four major works: a lower station, an upper station, a tower - to allow the gondolas to gain appropriate height to land on the upper station - and paths towards the main sightseeing of the Upper Town.

Fig. 5 Annex. A: lower station; B: Upper station; C: entrance gate to the Lower Town; D: Access path to the Upper town. (source: https://www.culture.gov.gr/el/Information/SitePages/view.aspx?nID=4455 with modifications).

### The lower station

The planned location for the lower station will require extensive landscaping and infrastructure, including the construction of access paths, given that the sloped areas make it necessary to connect the street level to the station. This will be the first modern building to be built outside the walled settlement, and its placement will interfere with how visitors perceive the main gate. This raises two major concerns:

- First, a modern construction—even if designed to mimic Monemvasia's architectural style—will disrupt a unique historical setting that has survived remarkably intact for centuries.
- Second, it will interrupt the powerful sense of progression as visitors approach the main gate, where the natural landscape gives way to the defined urban area.

### The upper station

The planned upper station for the cable car is located in an area known as **Tapia tou Kritou**, a leveled platform created by a soil fill between the fortification wall and the natural rock. This site is home to significant, well-preserved heritage, yet it has never been properly investigated. The proposed construction will be built directly on this fill, potentially causing irreversible visual damage to a part of the city known for its impressive water management facilities and dramatic views towards the sea.

Fig. 7 Annex. A view of the Tapia tou Kritou from the cisterns, showing the Galeazza in the foreground, the domed fountain, the fortification and the House of the Kritikos (Europa Nostra).

The remains include:

- **The Cisterns:** Two cisterns stand in close proximity. The **Galeazza** (or **Katergo**) is a vaulted, elongated structure featuring a water collection area with a crushed brick pavement. Rainwater was collected here through both a sloping wall and holes in the roof. The structure, including the water collection floor, is remarkably well preserved. Above the Galeazza is the **Galera** (or **Karavi**).
- **Stretches of the fortification** with a bastion and a barrel-vaulted construction, which offer impressive views to the steep rock, the Lower Town and the access route.
- **The House of Kritikos:** A partially preserved, unroofed construction that is partially in ruined condition.
- **The Fountain:** A small, four-sided vaulted structure with arched openings. Though identified as a mausoleum in the panels of the site, this building could be a post-Byzantine fountain. It is architecturally remarkable for its domed construction and proportions. It is supposed that water was supplied from two large reservoirs located at a close distance, including the Galeazza, the Galera and the Bastarda.

Fig. 8 Annex. The domed construction identified as a fountain or mausoleum (Europa Nostra).

The proposed construction of the upper cable car station presents a significant threat to Monemvasia's uninvestigated history. The buildings in this area are connected to a series of defensive structures and terraces whose character and significance are still unknown. Building the upper station on this site risks destroying critical historical evidence before it can be properly understood.

Specifically, the following concerns arise from the plan:

- **Invasive Construction:** The upper station is a large, invasive structure that will require extensive foundations. This will inevitably interfere with the historic character of the site and its existing structures.
- **Threat to Water Facilities:** This sector is particularly significant for its historic water management facilities—a critical component of a settlement that lacks natural springs. These structures are architecturally distinct and deserve careful preservation.
- **Lack of Investigation:** The full significance of this area has not been thoroughly investigated. Any intervention could irreversibly compromise the site's historical integrity.
- **Compromised Landscape:** The planned landscaping needed to connect the station's different levels is a modern addition that will fundamentally and irreversibly alter the original setting. Since the area has not been thoroughly studied, the exact nature of this historical setting remains unclear, making the potential damage even more unpredictable.

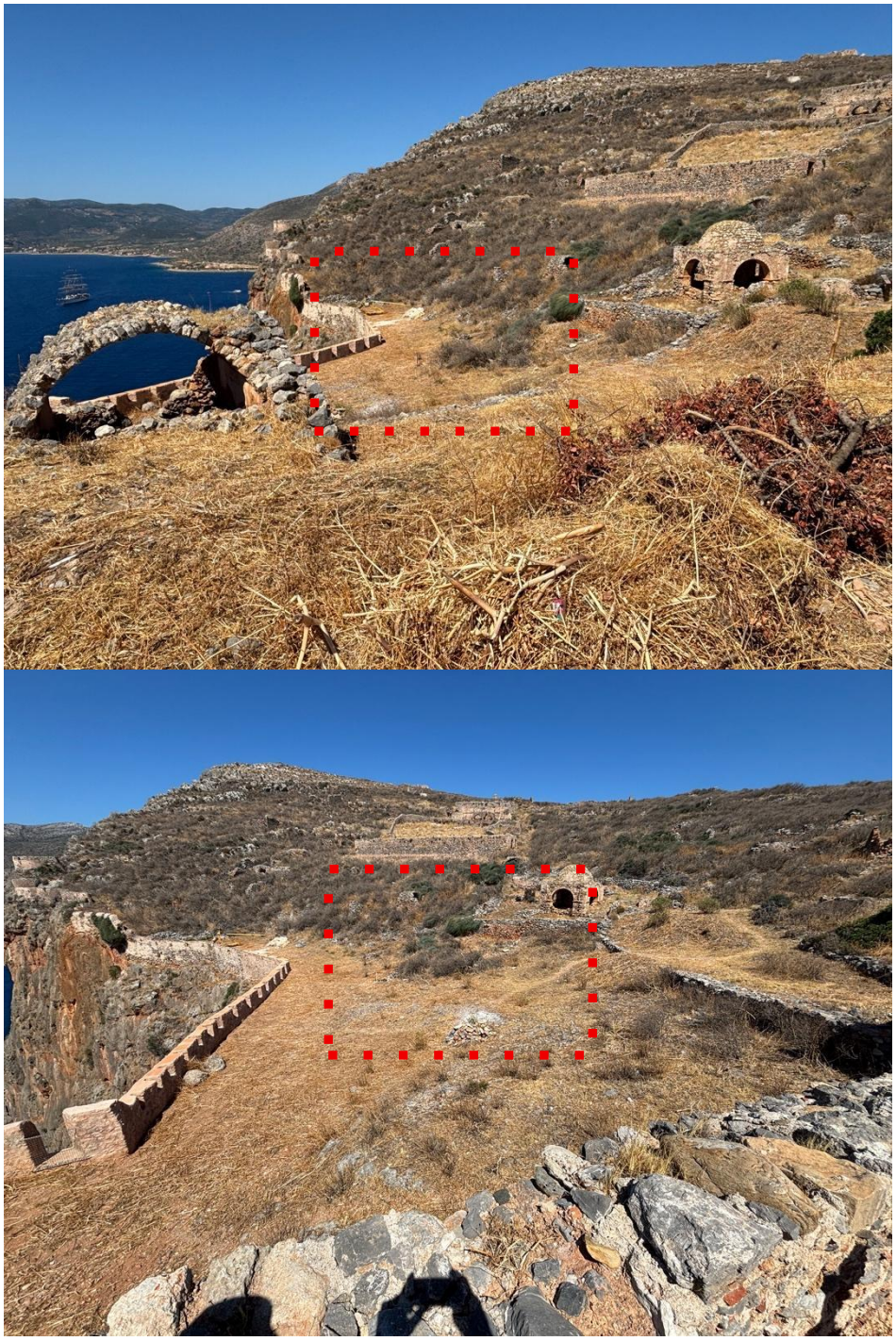

Fig. 9 and 10 Annex. These views of the area highlight the proposed location of the Upper Cable Car Station (marked by the red rectangle), showing how it will negatively impact the sightlines to the archaeological remains (Europa Nostra).

## The tower

The tower, a metal pylon necessary to support the weight of the cable car and its passengers, will require substantial anchoring to the rock through massive excavation. This raises several concerns:

- **Irreversible damage to a protected site**: The installation will involve drilling into the rock and creating concrete foundations, causing irreversible damage to a protected historical area.
- **Visual conflict**: The tower's invasive, contrasting metal structure will compromise the view from the surrounding buildings and disrupt the site's historical character.

**The path**

The installation of a cable car would inevitably increase human activity in the Upper Town. While the project aims to improve access for visitors with reduced mobility, this would require invasive interventions like constructing new ramps and paved surfaces.
A fundamental principle of heritage preservation is that visitor itineraries should enhance understanding of how a site was originally organized, not be randomly created. Unfortunately, the Upper Town remains a largely unexplored ruin covered in dense vegetation. Without systematic archaeological investigation to understand its original layout and street network, a comprehensive master plan for true accessibility is impossible. As a result, these interventions could be inappropriate and likely would only provide access to people with limited mobility in a very limited area of the site, as most structures are reached by uneven paths or steps.
For this reason, a significant concern is that new pathways will be created without a thorough understanding of the Upper Town's original infrastructure. This could compromise the historical integrity of the site.

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To conclude the following **principles** should be prioritized and thoroughly evaluated to ensure the site's preservation.

1. Preserve the Integrity of the Rock. The rock itself is an integral part of Monemvasia's heritage. Any new structures must avoid causing material damage to the rock or altering the existing views, especially in areas near historic buildings. Irreversible concrete foundations and rock drilling are not acceptable for a site that is fully protected by law.
2. Protect the Historic Access Path. The historic winding path connecting the lower and upper towns is not just a route; it is a fundamental part of the visitor's experience and a core element of the site's character. Any modern infrastructure, such as the proposed cable car, must not compromise this historic route or the perception of approaching the main gate.
3. Conduct Thorough Archaeological Investigations. The upper town remains largely unexplored. Before any intervention, systematic archaeological research is essential to understand the urban layout, infrastructure, and street network. The current understanding is often based on hypothetical interpretations, and the lack of thorough investigation could lead to irreversible damage to undiscovered historical evidence. Any new visitor paths should be designed in a way that respects the original layout, not created arbitrarily.
4. Ensure Scientific Review and Documentation. All research and proposed interventions must be fully documented and published. This is crucial for scientific consultation and ensures that any work conducted on the site is reviewed and approved by the community of experts. This principle guarantees that all actions are grounded in sound scientific practice.

5. Promote Community and Expert Dialogue. As one of the most significant examples of medieval archaeology in Greece, Monemvasia requires open discussion about any proposed interventions. All plans should be reviewed and discussed with experts, local stakeholders, and the wider community to ensure the preservation of this unique heritage site.
6. Uphold the Principles of Minimal Invasiveness and Reversibility. Any new installations must be minimally invasive and, ideally, reversible. The use of incompatible, modern materials and large, contrasting structures—such as metal towers—can jeopardize the site's aesthetic and historical integrity. Visual and material compatibility must be guaranteed to protect the site's unique character.

## II - Meetings – Persons met during the mission 11 – 13 July 2025

Friday 11 July (Athens)

a.m. Public Open Discussion
- Mr. Alexakis, Union of Monemvasites
- Mr. Kalligas
- Mr. Tanoulas, ICOMOS
- Local Journalists
- Members of ELLET
- Members of ELLET Architectural Council

p.m. transfer to Monemvasia

Saturday 12 July (Monemvasia)

a.m. Guided visit to Upper Town
- Efi Anagnopoulou, archaeologist and tourist guide
- Christos Panagiotopoylos, photographer

p.m. meeting
- Association "Politismikes Diadromes"(Cultural Paths)
- Mr.Giannis Kastanias, President
- Diamantis Panou

Sunday 13 July (Monemvasia)

a.m. Open Discussion with residents and the public
- Ann Eldridge, Monemvasia Society
- Giannis Favvas, Association 'Kastropolites'
- Giannis Moutsatsos, The Association of Engineers of Epidavros
- Panagiotis Papadakis, shop owners union representative
- Manolis Makaris, Opposition at regional Scale - voted against the project
- Byron Varas, works with the Municipality, access to studies
- Efi Anagnopoulou, archaeologist and guide
- Tsimpidis Theodoros, Athens resident with house in Monemvasia
- Maritsis Nikos, author of books on the protection of Monemvasia
- Maria Zisimou, guide
- Ioanna Maria Giakoumaki, artist, intangible heritage
- Lazarakis, engineer, foreign resident
- Maria Harami, Lawyer
- and more

p.m. transfer to Athens

## III - The Recovery and Resilience Fund (RRF)

The Recovery and Resilience Facility (RRF) is part of the NextGenerationEU programme. It totals €672.5 billion in 2018 prices - split between €312.5 billion in grants and €360 billion in loans. Established in 2021 to help EU Member States recover from the COVID-19 crisis and accelerate the green and digital transition, it is financed by common EU bond issuance under the 2021-2027 budget framework (Eipa, European Commission).

By 30 April 2021, Member States were asked to submit national recovery and resilience plans outlining reforms and investments with at least 37% devoted to "green" and 21% to "digital" priorities. Each plan included milestones and targets, which must be achieved to unlock disbursements (European Commission).

Allocation of the RRF was formula-based, favouring countries hardest hit by the pandemic e.g. Italy was allocated €194 billion and Spain €163 billion. Greece's plan "Greece 2.0" totals €35.95 billion, comprising €18.2 billion in grants and €17.7 billion in loans (aegeanconsulting.gr). EU-wide, by the end of 2024 only around 42% of funds had been disbursed and 28% of targets met, raising transparency and accountability concerns (Reuters). By contrast, Greece had reached 59% disbursement by mid-2025 (Greece 2.0, European Parliament).

The RRF has helped advance urban redevelopment and energy-efficiency projects in Greece (tovima.com), boosted hospital upgrades nationwide (euronews.com), and financed strategic infrastructure. A major success is the Cycladic Islands electricity interconnection, a €524 million project, co-financed by a €108 million RRF loan and €157 million loan from the European Investment Bank (EIB), building 350 km of underground and submarine cables to link the islands with the mainland (eib.org).

By contrast to the RRF, the EU Structural and Investment Funds (ESIF), notably the European Regional Development Fund (ERDF), are long-standing cohesion policy instruments (dating back to 1975) designed to reduce regional disparities, support infrastructure, innovation, and competitiveness across more than one multiannual budget cycle (2021–2027) (Wikipedia). Unlike the performance-based, earmarked RRF, ESIF uses shared-management delivery: Member States draft operational programmes, the Commission approves them, and regions then manage project selection, implementation and control - with continuous oversight from the Commission (Wikipedia).

# IV - Photographs

Photo 1

Ministry of Culture

Photo 2

The departure station and pylon

Photo 3

The arrival station – note the pylon on the left.