

REVIEW

by Prof. Dr. Arch. Ivan Danov

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on a dissertation submitted for the award of the **Doctoral Degree (PhD)**

Professional field: 5.7. Architecture, Construction and Geodesy

Doctoral Programme: *Architecture of Buildings, Structures, Facilities and Details*

Varna Free University “Chernorizets Hrabar”

By Order No. 338 of 23 June 2026 of the Rector of Varna Free University “Chernorizets Hrabar”, I was appointed as a member of the Scientific Jury for the procedure for the public defence of the dissertation entitled:

“Organisational Models for the Creation of Buildings in Bulgaria and Bavaria and the Formation of the Professional Tasks of Architects”

submitted for the award of the Doctoral Degree in the above-mentioned professional field.

The author of the dissertation is **Dipl.-Ing. Arch. Stoyan Georgiev Todorov**, a doctoral candidate enrolled, according to the submitted documentation, under an unspecified mode of study at the Department of Architecture and Urban Planning, with **Assoc. Prof. Dr. Arch. Zhechka Ilieva** as academic supervisor.

The set of hard-copy materials submitted by Dipl.-Ing. Arch. Stoyan Todorov includes:

- the dissertation;
- the dissertation abstract;
- a list of scientific publications related to the dissertation topic.

The doctoral candidate has not submitted any studies, monographs, or publications specifically related to the dissertation topic.

The dissertation comprises **696 pages**, including 504 pages of main text and 192 pages of appendices, with 60 figures and a bibliography comprising 24 monographs, 25 printed normative publications, and 86 Internet sources. The dissertation is structured into an introduction, five chapters, and a conclusion. Of the 24 works listed as monographs, at least eight cannot properly be classified as scholarly works, including, for example, a Hansard transcript of Churchill's speeches, Leonardo's codices, and Llull's *Ars Magna*.

1. Comments on the Submitted Documentation and the Admissibility Procedure

In my opinion, the volume of the dissertation—504 pages of main text—as well as the considerable length of the abstract, necessitates substantial editorial revision, both in terms of content and style.

The dissertation contains numerous repetitions and extensive verbatim reproduction of normative documents. A considerable portion of this material could appropriately be transferred to appendices, thereby allowing greater emphasis to be placed on the principal theses, arguments, and research findings. The inclusion of forms, administrative documents, and court decisions also contributes significantly to the overall length without always adding directly to the analytical value of the research.

There is a noticeable disproportion between the principal analytical text and the supporting material. It should also be noted that entire pages are reproduced in foreign languages. Given that Bulgarian is the official language of the academic work, such material could more appropriately be presented in appendices or incorporated through carefully selected quotations accompanied by translations.

2. Brief Biographical Information on the Doctoral Candidate

The doctoral candidate has not submitted a curriculum vitae. Since I have known him and his professional career for more than ten years, I am in a position to provide relevant personal observations.

Arch. Todorov is a graduate of the Technical University of Munich and is a member of the Chambers of Architects in both Bavaria and Bulgaria. He is an established professional with successful architectural practices in Germany and Bulgaria.

His professional work is characterised by precision, consistency, and a high degree of commitment. He is familiar with contemporary trends, technologies, and practices in the architectural profession and possesses direct practical experience of the differences between the conditions governing professional practice in Germany and Bulgaria.

At certain points, however, this strong professional commitment to the issues under consideration appears to influence the degree of academic distance maintained in the dissertation.

3. Relevance of the Topic and Appropriateness of the Aims and Objectives

The problem addressed by the dissertation is highly relevant from scientific, scientific-applied, and practical perspectives. The topic addresses fundamental issues concerning the functioning of the state and public institutions in Bulgaria.

As early as 2013–2014, the Ministry of Investment Planning, which I headed at the time, prepared a comprehensive reform of construction legislation and of the legislation and regulations governing public procurement in construction. Approximately 99% of the proposed changes were based on German construction legislation and the German experience of that period. These reforms were not adopted, either by the government then in office or by the opposition. The reasons for this will become apparent later in the analysis of the dissertation.

In this respect, the doctoral candidate may be regarded as continuing an initiative with the potential to exert a positive influence on construction activity in Bulgaria and to reduce the corrupt practices criticised by the public but which have proved particularly persistent.

There appears to be an “unofficial barrier” in the public sphere surrounding the analysis of the causes and conditions that facilitate such practices.

In view of the experience I have accumulated, I consider the issues addressed in the dissertation to be exceptionally timely and socially significant. The future development of the country depends to a considerable extent on how these problems are addressed.

4. Knowledge of the Research Problem

Arch. Todorov demonstrates an in-depth understanding of the problems under consideration and possesses substantial practical experience in this field.

The literature and normative materials used demonstrate an ability to adopt an analytical and critical approach to a significant proportion of the issues addressed.

5. Research Methods

The declared methodology is based on a holistic comparative approach to phenomena within the construction sectors of Bavaria and Bulgaria. The author employs methods derived from systems theory, as well as systemic, comparative, and contrastive analysis and synthesis. He also proposes testing of the models developed in the dissertation.

Regarding the declared use of a questionnaire-based approach, however, I was unable to identify the questionnaire itself or the corresponding results in the dissertation.

The same applies to the proposed software application for a new “digitalised business process”, whose definition and functional scope are not sufficiently clearly specified. There is also serious reason to question the statement that, through the software, “the conclusions reached are practically confirmed” (p. 478).

It is methodologically problematic for software that implements the author’s own assumptions to be subsequently presented as confirmation of those same assumptions. There is no independent validation mechanism; figuratively speaking, this constitutes a “closed loop of assumptions and confirmations”.

Testing under alternative evaluation conditions is therefore necessary before claims of objectivity and, consequently, scientific validity and reliability can be made.

The research methods selected are well established and widely used in the relevant academic fields. They provide an appropriate basis for pursuing the stated aims and addressing the research questions. At the same time, certain of the declared methods and results require additional empirical validation in order to strengthen the scientific reliability of the conclusions.

6. Characterisation and Evaluation of the Dissertation: Analytical Review by Chapter

6.1. Introduction

A principal motivation underlying Arch. Todorov's work is the intention to establish the profile of the contemporary architect as a "**generalist**", together with a number of conclusions concerning certain regularities in the practice of the architectural profession.

To a considerable extent, and recognising that these claims are informed by Arch. Todorov's German professional background, I agree that they are valid. Nevertheless, they are strongly differentiated according to geographical and historical context.

The tendency to treat a single model as universally applicable in our multipolar and open world gives rise to serious reservations. Numerous successful architectural practices are known, particularly in North America, where so-called "star architects" commission the preparation of detailed working documentation to specialised design firms whose principal staff are "narrow specialists", in the terminology used by Arch. Todorov.

The English model is another relevant example. Equivalent to phases 6, 7 and 8 under the German HOAI—and in some cases even phase 5—are activities undertaken by an entirely different profession, namely the **quantity surveyor (QS)**.

International practice therefore accommodates both "generalists" and successful forms of highly specialised professional practice.

From the outset, the dissertation displays a certain tendency to idealise, or to adopt a somewhat partial view of, the qualities of the Bavarian model. Because this aspect is expressed predominantly in declarative rather than evidentiary terms, it affects the objectivity of the research and constitutes a methodological weakness.

Scientific inquiry must be based on facts, appropriate scholarly methods, and evidence. This is one of the fundamental distinctions between academic research and advocacy or media promotion.

The declared objects of research are "buildings in Bulgaria and Bavaria as the result of the embodiment of specific building cultures, framework conditions, and relationships between the roles of architects and clients in building projects and the quality of the built living environment".

This definition suggests that the buildings themselves are to be investigated, as explicitly stated by the author. Such an investigation, however, is not actually identifiable in the text.

In practice, the object of investigation is the normative and institutional framework—the framework conditions governing the practice of the architectural profession in Bavaria (or, more precisely, Germany, given that many of the documents used by the author are German rather than specifically Bavarian) and in Bulgaria.

The dissertation does not, however, provide sufficient evidence that these framework conditions directly influence or determine the quality of the living environment.

The definition of “quality of the living environment” is based on the Davos document of 2018, which is essentially a political declaration rather than a concept fully compatible with architectural science.

It should nevertheless be acknowledged that the doctoral candidate correctly identifies the quality of the living environment as being dependent on “building culture”, although the literal translation of the German term *Baukultur* does not fully correspond to its meaning and established usage in the Bulgarian context.

There is also a lack of clarity concerning the precise subject of the research. The scope of the study, moreover, requires substantial refinement, primarily through reduction.

The aims of the research are likewise insufficiently defined. An “analysis of the interests and public responsibilities of the participants in the process” (p. 23) cannot itself constitute a research objective. Analysis is a research instrument, not an objective.

The four proposed hypotheses are formulated in such a way that they cannot readily be falsified. A formulation of the type “the more distorted ..., the stronger ...” employs evaluative terms for which no operational measure is provided.

Scientific research, however, requires precision and clearly defined parameters. In their present form, these hypotheses therefore do not provide sufficiently robust scientific propositions, although they could serve as starting points for further research, which has not been undertaken in the dissertation.

A hypothesis is a scientifically grounded proposition intended to explain a phenomenon or a relationship between events and is subject to testing and verification. Such verification is not demonstrated in the dissertation.

These observations relate to a considerable extent to the organisation of the doctoral training and to the procedures preceding the defence, insofar as the development and refinement of the research framework constitute an integral part of the educational component of a doctoral programme.

In this context, I believe that the academic supervision should have directed the author towards a clearer definition of the research subject, objectives, and testable hypotheses.

6.2. Chapter One – Historical Metamorphoses of the Professional Tasks of Architects in Bulgaria and Bavaria

This chapter represents a highly detailed study of archival documentation dating from 1861 onwards. It provides an excellent historical overview based on preserved and reproduced authentic documents.

The analysis of the historical period in Bulgaria prior to 1944 is particularly convincing and successfully conveys the legacy and professional ethos of the “architect-generalist”.

I nevertheless consider it problematic to treat the period from 1945 to the present as a single historical period.

The conclusion that the three principles of structural soundness, functionality, and aesthetics were observed and applied to varying degrees is correct, as is the observation that the architect gradually lost the role of the “generalist” that had largely characterised the profession before 1945.

The changes that occurred in Bulgaria after the Second World War were political as well as economic. Arch. Todorov provides a highly precise examination of changes in the regulatory framework and in the roles and functions of architects during this period, supported by documentary evidence.

From a scientific perspective, however, the treatment of the periods 1945–1989 and the post-1989 period as a single continuum constitutes a weakness. The comparison with Bavaria over this period is likewise insufficiently substantiated.

In Bavaria, private property did not undergo the kind of disruption and subsequent transformation experienced in Bulgaria. Even the Nazi regime (1933–1945), although totalitarian, preserved private property. This continuity contributed to the consistent development of the institutional framework governing the architectural profession.

For the purposes of this argument, I will refer to the Marxist proposition that culture has a superstructural character and is consequently dependent upon the economic base. Marx also regarded architecture as part of culture, a proposition to which I have certain reservations.

Consequently, the framework conditions governing the architectural profession may be regarded as partly deriving from the prevailing form of ownership and the corresponding economic model.

Unfortunately, Arch. Todorov does not analyse several factors that had a profound influence on the differences between the conditions under which the professions developed.

Bavaria is one of the wealthiest federal states of Germany and was comparatively little affected by the Second World War. Following the war, it remained within the American sphere of influence, including economically.

Munich has a distinctive constitutional and administrative status as a city-state and federal state, traditionally described as a “free city”. The political transition in West Germany was from a

totalitarian to a democratic form of government within a federal system, characterised by substantial decentralisation and without a fundamental transformation of property relations.

These circumstances provided significant foundations for political freedom and democratic governance. There was no fundamental historical or economic discontinuity in property relations, and consequently no corresponding disruption in the status of the practising architect or the administration.

By contrast, Bulgaria established an economic model of state capitalism, with only limited private ownership, combined with totalitarian political power, officially referred to for ideological reasons as “socialism”.

Within such a system, those in power had little need for the “architect-generalist”: an independent, autonomous, knowledgeable and capable professional with an understanding of construction economics.

Moreover, the period was characterised by centrally established state prices, including in construction, which rendered the contemporary phases 6 and 7 of the professional methodology of the Chamber of Architects in Bulgaria largely meaningless.

What was required at that time were employed designers organised within design institutes, who gradually became increasingly detached from the construction process and evolved into what might be described as “architects as document producers”.

In 1960, the state authorities, which were in practice party authorities, introduced the position of **Chief Architect**, namely an architect placed hierarchically above other professionals.

The Chief Architect was empowered to serve the interests of the governing authorities and to regulate the professional activities of the architectural community, including by authorising deviations from construction rules and standards whenever the authorities required them.

The Chief Architect was effectively placed above the law. In order to maintain control over the professional community, the official Union of Architects in Bulgaria (SAB) was established, while architects were encouraged to identify themselves with the artistic professions, together with certain privileges associated with that status. The result was an even greater separation of architecture from construction practice. This type of state and economic system had no structural need for “generalists” of the type found among some architects in Bavaria.

After 1989, the new Constitution restored and guaranteed private property and the right to free economic initiative. The political system was founded on modern democratic principles comparable to those prevailing in Western European countries. Over approximately the past two decades, however, the country’s economy has evolved into what may be described as an oligarchic model, with representative democracy significantly influenced by oligarchic interests.

The structures of this model, particularly those connected with the construction sector, are sustained to a significant degree through investment projects financed by state and European funds. Under these conditions, as previously, there is little room for the architect or engineer as a “generalist”, because such professionals could constrain uncontrolled increases in construction

costs. Thus, since the Second World War, Bulgaria has undergone a series of highly dynamic stages that have not had a particularly positive impact on the model of architectural practice, although the profession has survived despite these adverse conditions.

Had Arch. Todorov incorporated these factors and the conclusions arising from them, the dissertation would have provided a more complete scientific explanation of the causes underlying the phenomena rather than focusing primarily on their consequences. Nevertheless, his conclusions, insofar as they are based on the facts he has documented, are in many respects undoubtedly valid. I offer these additions and observations in the spirit of constructive criticism, with the intention of further substantiating some of the doctoral candidate's conclusions. Arch. Todorov correctly traces the changes in the legal framework of the country and explains their consequences for the transformation and distortion of the architect's professional role. His criticism of the normative documents through which the professional significance of the "architect-generalist" was progressively diminished and eventually removed from substantial participation in the construction process is well founded. These normative documents were themselves consequences of the prevailing economic models and served to facilitate their functioning. The conclusion that the term "project"—used at one point to denote an undertaking and at another to denote a component of a body of documentation—constitutes a form of **"conceptual eclecticism"** is of considerable value. It helps explain existing realities, including the numerous conflicts of interest involving both public administration and professional practice. The analysis and critical observations concerning the Spatial Development Act, including the fact that the word "architect" occurs only once in it, are particularly noteworthy. The conclusion that the Spatial Development Act has a hybrid character, combining a legal doctrine originating in a socialist society with an unsuccessful adaptation to a free-market economy, is persuasive (p. 56). Consequently, the law contributes to constraining both the development of a favourable living environment and the broader economic development of the country. Similar conclusions were reached by the Ministry of Investment Planning in 2013. However, the political-economic model described above, based on the allocation and absorption of substantial public funds, has little incentive to modify a legislative framework that protects its financial interests.

The second part of this chapter has considerable informational value, as it provides a detailed account of the development of professional practice in Bavaria. As a minor correction, I would note that some of the laws and normative documents cited are German federal regulations rather than specifically Bavarian legislation. The chapter's concluding discussion, describing the separation of the Bulgarian architect from the substance of the profession, provides a valuable comparison of the nature of property ownership in the two countries and its influence on the quality of the living environment. Whereas the Bulgarian Constitution proclaims private property to be inviolable (Article 17(3)), the German constitutional framework, while guaranteeing property, also establishes that ownership entails obligations and that its use should simultaneously serve the public good. The author's conclusion that the German constitutional framework establishes a balance between private and public interests in relation to property, whereas this issue is not equally fundamental in the Bulgarian Constitution, represents a significant contribution to the arguments concerning the architect's role and responsibilities towards the living environment of society. I would recommend that this chapter also investigate the reasons for the increasing frequency of amendments to the Bavarian Building Code

(*Bayerische Bauordnung*), which was relatively stable until 2008, whereas amendments subsequently became almost annual. This raises questions concerning legal continuity. I would also recommend that the German terms “**vorlageberechtigt**”—referring to the entitlement to submit or sign building documentation—and “**Entwurfsverfasser**”—the person responsible for preparing the design—be explicitly discussed. These terms, which define important aspects of professional responsibility, help explain the capacity of the architect in Germany to function as a “generalist”. The German framework also contains another important feature: architectural designs may be prepared by persons without formal architectural education who nevertheless possess the legal right to submit building documentation (*Vorlageberechtigung*). I know personally several such practitioners. This raises an important question concerning the extent to which the professional status of the architect in Bavaria, and more broadly in Germany, is legally protected and whether it is, in fact, subject to such protection. Most of the conclusions of the chapter are valid. Particularly valuable is the analysis of the distinction that, in Bulgaria, the architectural profession is oriented towards producing projects as documents, whereas in Bavaria it is oriented towards delivering completed buildings. The expected outcome of professional activity is therefore different because the underlying objectives are different.

Arch. Todorov places considerable emphasis on the responsibility of the profession for the quality of the human-living environment. In this context, however, attention should also be paid to the **cost–quality relationship** in construction, which is repeatedly mentioned throughout the dissertation. No comparison is made of architects’ professional fees in Bavaria and Bulgaria. Fees are also a determining factor: expectations concerning the type and scope of professional services cannot be considered equitable unless those services are adequately remunerated. This important dimension is absent from the analysis.

6.3. Chapter Two – Regulatory Framework Conditions for the Practice of the Architectural Profession in Bulgaria and Bavaria

This chapter defines the characteristics and content of the architectural profession on the basis of various European documents. It examines European Commission directives, qualification requirements, and related matters. This part of the dissertation is predominantly informational.

I would make the following recommendations concerning Chapter Two:

- A substantial part of the chapter should be transferred to the appendices, given its predominantly informational character and the inclusion of extensive normative documents. In this form, the material could constitute a valuable independent reference resource for the practice of architecture in Germany and Bulgaria. Within the dissertation itself, however, it should be substantially reduced so as not to obscure the principal analytical line.
- There is a certain linguistic imprecision in the author’s statement on p. 84 that “the Bulgarian architect can perform xxx% of his professional profile in Bavaria”. It would be more accurate to state that Bulgarian or Bavarian architects are legally entitled to perform certain types of work in Bavaria or Bulgaria, respectively. Whether they possess the

competence and preparation to perform those activities is a separate question. Legal entitlement does not necessarily imply professional capability.

The generalisation that Bulgarian architects as a group are unable to perform such activities is professionally inappropriate and factually incorrect. It could readily be disproved by reference to numerous highly competent Bulgarian architects.

- The chapter again demonstrates an imprecise understanding of the term “**EU/EC directive**”. A directive is not a law in the conventional sense but an instrument intended to harmonise national legislation where appropriate and desirable. It does not automatically or completely unify national legal systems. Member States retain a degree of discretion in transposing directives into national law.
- The parallel presentation of identical texts in German and Bulgarian—for example, on pp. 151–154 and elsewhere—is not convincing. If the purpose is to demonstrate the accuracy of the translation, it would be sufficient to reproduce selected key passages together with the necessary translation. Full bilingual reproduction substantially increases the length without a proportionate increase in scientific value and could appropriately be transferred to the appendices.

In its conclusions, the doctoral candidate proposes the direct adoption of the Bavarian definition of the architect’s role, with the professional tasks formulated according to the HOAI document, which has itself been translated almost literally and proposed as a methodology of the Chamber of Architects in Bulgaria (KAB). Unfortunately, this methodology has not been successfully implemented in Bulgarian practice. The KAB methodology concerning the scope of architectural services does not correspond to Ordinance No. 4 on the Scope and Content of Investment Design Projects. This discrepancy makes the KAB methodology difficult to apply in practice. Arch. Todorov correctly identifies the conceptual differences between the two countries. The conclusions of the chapter are, in general, sound. The criticism of the Spatial Development Act, the Copyright and Neighbouring Rights Act, and related regulations is reasoned and persuasive. Construction documentation differs substantially between the two countries. One of the major weaknesses in Bulgaria is the absence of a normative document comparable to **DIN 69901**, defining what constitutes a project and specifying its characteristics.

In this chapter, Arch. Todorov describes many of the peculiarities of Bulgarian practice from the perspective of a professional practicing in Bavaria. I would nevertheless recommend extending the critical analysis to the German construction regulatory framework itself, as well as to European Commission directives. These too contain proposals that may be illogical or difficult to implement and that may function more as politically attractive aspirations than as effective regulatory mechanisms. On pp. 116–118, Arch. Todorov analyses a European Commission document concerning the regulation of professional services. The document has a restrictive dimension and, as the author correctly observes, “invisible barriers that restrict innovation” may be embedded within such regulatory approaches. The conclusion that the European Commission cannot always achieve an appropriate balance between necessary entry regulation and the actual quality of professional outcomes is convincing.

The comparison between models based on the logic of **professional protection** and those based on **market efficiency**, as practised in different EU Member States, supports the conclusion stated above. The chapter also examines the role of the architect in various stages of the process of creating the built environment. Attention is paid to **architect's supervision**, the **site manager**, and the **consultant** in the preparation and implementation of an investment project in Bulgaria. Pages 163–166 explain the philosophy and logic underlying project implementation procedures and the legal basis governing professional relationships in Germany, including the German Civil Code. At a later stage, I would recommend studying the construction legislation of other European countries with demonstrably successful architectural and construction models, such as Italy, France, Austria, and England, including both their strengths and their weaknesses.

At the end, in the section designated as a “summary”, consisting of a thesis, argumentation, and conclusions, the author partially redefines the results obtained up to that point. Some of the conclusions are convincing, while others require clarification or reflect a personal position. The proposition that the correct professional model is that of the “**Bavarian architect-generalist**” is appealing and is also viewed favourably by this reviewer. However, international practice demonstrates that it is neither the only successful model nor a universal solution to the problems under consideration. I would add that an even more comprehensive “generalist” model than that found in Bavaria is represented by the Austrian **Baumeister**, who possesses broader powers related to construction and its documentation and occupies a hierarchical position above both the architect and the structural engineer. The author’s partiality towards the Bavarian model constitutes an obstacle to the scientific substantiation of such a universal thesis. I therefore recommend that experience from the rest of Europe, North America, and Asia—including Dubai, the United Arab Emirates, Singapore, and China—also be examined. Bavaria is undoubtedly a valuable example, but it is not the only successful model in the world.

6.4. Chapter Three – Administrative, Judicial and Business Practices Shaping the Framework Conditions for the Practice of the Architectural Profession in Bulgaria and Bavaria

There is no doubt that legislation reflects the political and economic reality of a country and regulates relations between public and private interests. This chapter, however, contains substantial material directly related to the author’s personal administrative and judicial proceedings involving KIIP, KAB, and DNCK. When a researcher is personally involved in the proceedings being examined, questions necessarily arise concerning the required degree of scholarly distance and the extent to which such materials can serve as impartial empirical evidence. Additional attention should be paid to the way judicial decisions and individual public officials are characterized. I recommend that such evaluative statements be replaced with a neutral analysis of facts, procedures, and legal consequences. Accordingly, I consider that Chapter Three should be substantially reduced or, if it cannot be directly connected to the central research thesis, removed from the main body of the dissertation.

There is nevertheless one conclusion in Section 4.1 that merits particular discussion. The dissertation claims that “the genesis of the decline of the architectural profession in Bulgaria lies in the historical development of the country” and that this “degradation” is reflected in the work

of numerous Bulgarian architects practising under different regulatory regimes from 1944 to the present (p. 305). In my view, this formulation is excessively generalised and does not adequately recognise the diversity and quality of Bulgarian architectural practice during the period under consideration. Numerous significant architects and important architectural works can be identified that were produced under different political, economic, and regulatory conditions. It is therefore necessary to distinguish between limitations imposed by the professional environment and the quality of particular architectural works. Such a distinction would strengthen the analytical basis of the argument.

6.5. Chapter Four – Regularities in the Implementation of Building Development Projects in Bulgaria and Bavaria

This chapter declares an intention to identify regularities, but the discussion is to a considerable extent focused on models for organizing the relevant processes. In connection with the Bavarian Phase 0 discussed on p. 311, the question arises as to whether construction costs can reliably be determined over an extended period in conditions of significant price volatility and inflation. On p. 343, source No. 347 from 2010 is used, at a time when the economic conditions in Germany differed substantially from those prevailing today. The cost forecasting methodology should therefore be linked to current economic indicators, and the range of applicability of the proposed model should be clearly specified. The conclusions concerning the role of the architect in Bulgaria and Bavaria are, to a considerable extent, convincing. The assertion that in Bavaria design is concentrated in a single interdisciplinary professional—the author of the conceptual design, who is most often an architect and is entitled to sign the entire project documentation while assuming the corresponding responsibility—is correct, but primarily in relation to smaller projects for which a “one-man show” organizational model is sufficient. This does not, however, correspond to the organisational structure of major German architectural practices, such as von Gerkan, Marg und Partner; Behnisch & Partner; JSK; the German branches of Norman Foster’s practice; OMA; Zaha Hadid; Helmut Jahn; and many others. Most such practices involve a division of professional activities. Indeed, the author’s subsequent clarification partially contradicts his preceding statement. The subsequent observations, information, and findings are generally valid. Particularly valuable for Bulgarian practice is Arch. Todorov’s conclusion that effective control mechanisms over the design process in Bulgaria are insufficient and that professional responsibilities are significantly reduced. The negative consequences generally fall upon the client and the contractor. This chapter provides a useful account of the various participants in the process. The proposed models for implementing construction tasks are of particular interest. At the same time, a question again arises as to whether the subject matter of the dissertation may more appropriately belong to another academic field, such as construction economics, project management, or a related discipline. The relationships between the various participants in the process are examined and five implementation models are proposed, most of which appear applicable primarily to residential buildings. Arch. Todorov observes that Bulgarian architects lack the knowledge and skills necessary to guarantee an appropriate cost–quality relationship in the construction product and that they regard economic planning as “outside the proper scope” of the profession. He does not, however, take sufficiently into account the fact that Ordinance No. 4 on the Scope and Content of Investment Design Projects does not provide

such activities at all. This anachronistic situation, inherited from the period of centrally established construction prices, continues to exist. Responsibility for this situation cannot reasonably be attributed to architects. It derives from the regulatory framework and, more fundamentally, from an economic model that does not require systematic definition or scientific justification of construction costs. The absence of this conclusion constitutes a weakness of the dissertation. The conclusions presented at the bottom of pp. 323–324 are particularly significant for the professional and institutional debate. The claim that financial savings may reach **15–20%** is interesting and has considerable potential for further quantitative investigation. Based on my practical observations, savings in certain circumstances may be considerably greater. In order for this conclusion to acquire greater scientific value, however, it should be supported by specific empirical data and comparable case studies.

The organisational models presented and their analysis possess significant scientific-applied value and contribute to the body of knowledge relevant to project management. A characteristic weakness of accountability in Bulgarian construction is the transfer of responsibility to the legal entity—the construction company—while individual responsibility is often absent. The analyses of the advantages, limitations, and shortcomings of the models are generally correct. A certain incompleteness can be observed in **Model BG-5**, particularly in cases where the architect simultaneously acts as client and contractor. For residential construction, such an organisational arrangement would provide the architect with a direct understanding of the actual market value of professional work following completion of the final product—the dwellings—expressed as the difference between construction and associated costs and the final sales price. Section 1.6.1 examines the functions of construction supervision and the consultant. The statement that construction supervision has no equivalent in another European country is not correct. The model was adopted from France, where at least three companies—**SECOTEC, DEKRA, and Apave**—perform functions essentially equivalent to those performed by construction supervision entities in Bulgaria. The effectiveness of this form of control is a separate matter; however, in scientific work the accuracy of factual statements is of fundamental importance. In Section 1.6.2, concerning the “site manager”, Arch. Todorov, as well as many Bulgarian contractors working in Germany, employs terminology that, in my opinion, requires greater precision. The German equivalent in functional terms of the Bulgarian “technical manager” is the **Polier**, whereas the **Bauleiter** is the technical director responsible for the relevant professional and licensing functions. The dissertation subsequently presents five German organisational models. This part of the work is predominantly descriptive. Comparable organizational models based on **DIN 276** were presented by the Ministry of Investment Planning in 2013–2014, but they were rejected. This remains an issue that is rarely discussed publicly. The current economic structure of the country does not permit the implementation of any of these models in investment projects. The thesis and conclusions in Sections 3.1, 3.2 and 3.3 are correct and well argued. There is a lack of political and economic will in the construction sector, but this cannot reasonably be attributed to the architectural profession.

6.6. Chapter Five – The Role of the Architectural Profession in Balancing Public and Private Interests in the Creation of Buildings in Bulgaria

This chapter largely repeats material presented earlier. Its title is not fully consistent with its actual content, which is again predominantly citation based. I would recommend transferring a substantial part of this material to the appendices, as it does not make a significant independent scientific contribution. The terminology cited could and should be consolidated in a glossary at the beginning of the dissertation to ensure clarity and consistency throughout the text. A substantial part of the chapter repeats information and arguments already presented in earlier chapters. Again, the discussion focuses predominantly on Bavaria, whereas the chapter title suggests a considerably broader direction. The scope even extends to suppliers of construction materials and equipment. Regarding the statements on p. 418 concerning digital reform in Bulgaria, the dissertation does not appear to take sufficient account of recent developments. Platforms based on artificial intelligence are currently being prepared in Bulgaria with the aim of facilitating and accelerating processes in this field. There are also statements on p. 421 concerning the legal order in Bulgaria that are factually questionable and lie outside the immediate subject matter of the dissertation. The conclusions of the chapter do not clearly distinguish newly established scientific results and, in places, have a more journalistic than academic character. I therefore consider that Chapter Five should be substantially revised and, if it cannot be clearly linked to the central research thesis, removed from the main body of the dissertation. The dissertation concludes with a section in which the author reiterates several of his theses and formulates his views concerning the scientific, scientific-applied, and practical contributions of the work. In view of the specific conditions prevailing in the country, I will refrain from making a definitive assessment of the practical applicability of the study. The dissertation nevertheless possesses substantial value as an informational and reference resource.

7. Contributions and Significance of the Research for Science and Practice

In the concluding section of the dissertation abstract, the author himself acknowledges that the scientific contributions of the work are not sufficiently clearly differentiated. The dissertation does not formulate sufficiently clear answers to the question of “**why**”, nor does it investigate causal relationships in a systematic manner. The material selected for investigation and the holistic approach provide a basis for numerous conclusions of scientific relevance and potential. Some of these shortcomings are attributable, in my view, to academic supervision and to the relevant academic unit. The historical review presented in Chapter One and the analysis of the exceptionally large body of documents, drawings, and texts collected by the author possess genuine scientific value. The principal achievements of the dissertation are related to the investigation of an issue of considerable contemporary relevance in Bulgaria, while at the same time the subject appears to be surrounded by an “unofficial barrier”—an informal reluctance to engage openly in discussion of the issue. The comparison with the Bavarian model demonstrates that there is an alternative approach to the implementation of investment projects, with its own advantages arising from a different economic and political foundation. This has a clear scientific-applied dimension.

The significance of the dissertation lies primarily in its critical analysis of the state of the architectural profession in Bulgaria, the limitations and negative consequences of the existing model, and the arguments supporting the need to reform that model to establish a more sustainable and predictable framework for future development. If one contribution is to be identified as the most significant, it is the observation that, under Bulgarian legislation, projects are primarily oriented towards the production of documentation—whether paper-based or digital—whereas in Bavaria the objective is the completed building: **the project ultimately becomes the building itself**. This conclusion deserves to be communicated to the architectural profession, as well as to clients and legislators. Whether the architect should function as a “generalist” or as a member of a specialised team is, in my view, a secondary issue. The organisational models presented in the dissertation possess substantial practical value.

8. Assessment of Publications Related to the Dissertation

The publications are presented quantitatively—nine in total—and, on the basis of the documentation submitted, it is not possible to provide a substantive review of each individual publication. Arch. Todorov has also submitted a table of so-called scientometric indicators in accordance with the applicable formal requirements. I would emphasise, however, that quantitative measurement of publication activity should not replace an assessment of the **quality, scientific significance, and individual contribution** of the publications.

9. Personal Contribution of the Doctoral Candidate

The personal contribution of the doctoral candidate to the development of the dissertation is beyond doubt, as is the absence of evidence that the research was substantially directed by the academic unit. Arch. Todorov demonstrates an impressive command of the subject matter, presents his thesis convincingly, and defends it with confidence and consistency. He is motivated by a strong personal professional commitment to improving the legislative framework governing the architectural profession in Bulgaria. His persistence, personal commitment, and professional engagement deserve positive recognition.

10. Dissertation Abstract

The submitted dissertation abstract occupies ten pages of the principal document. In formal terms, it corresponds to the requirements adopted in Bulgaria for the structured presentation of doctoral research. Its quality and content demonstrate the author’s ability to present the principal theses and results in a concise and coherent manner. The material is logically structured, comprehensive in content, and clear and intelligible in presentation. The abstract itself possesses qualities that would allow it, following appropriate editorial revision, to serve as the basis for an independent publication.

11. Critical Remarks and Recommendations

a. The preparation of a scholarly work requires an impartial and evidence-based approach.

A strong personal commitment to the problem under investigation is understandable and may constitute a valuable source of motivation. It should nevertheless be clearly distinguished from analytical assessments and scientific conclusions.

b. As a continuation of the above observation, and in response to the relatively uncritical treatment of the German construction context in the dissertation, I would recommend that the following issues be considered critically within the comparative analysis:

- **Control of unauthorised construction in Germany.** The Tesla factory near Berlin, where construction commenced before the final permit for the entire facility had been issued, provides a relevant example. This was possible through the German mechanism of *vorzeitiger Maßnahmenbeginn*, permitting certain construction activities to commence in advance following authorisation by the environmental authorities. The project was accompanied by significant public protests. The case raises questions concerning the effectiveness of construction-control mechanisms and the influence of economic interests on their implementation. The dissertation does not provide sufficient information concerning the subsequent legal regularisation of the project. This raises questions concerning the comparability of such practices with the Bulgarian context. In terms of scale, the Tesla facility is incomparable with the “Tesla Baba Alino” project near Varna.
- **The assumption of error-free design practice.** Construction of Berlin Brandenburg Airport lasted for more than twelve years, and substantial corrective works were required because of errors and deficiencies in the original design. The associated cost overruns have not, according to the reviewer’s assessment, received adequate public attention. This experience contributed to changes in German construction legislation in 2005, including the introduction of five building categories under which the approach, content, and scope of project documentation differ from those applied during the 1990s. The conclusion is straightforward: not all projects are error-free.
- **Equality and fairness in professional practice.** Article 650 of the German Civil Code, discussed in Arch. Todorov’s dissertation, grants extensive rights to the client and may place designers and contractors in a comparatively weaker contractual position. This raises questions concerning equality and fairness in commercial law. The relevant provisions were amended in the early 2020s. According to press reports, some of the causes of the large number of insolvencies among construction companies and design practices in Germany in recent years have been associated with these legislative changes.
- **Housing costs.** As a consequence of what is presented as “good design practice”, housing loans for recently constructed dwellings may extend over periods effectively involving two or three generations of borrowers. Housing is becoming increasingly inaccessible to citizens. Such a situation can hardly be regarded as constituting an “optimal living environment”.

These four examples justify raising the question of whether the uncritical and literal adoption of Bavarian construction legislation in Bulgaria would necessarily produce positive effects for

Bulgarian construction practice and society. In my view, comparative analysis should take into account not only regulatory solutions but also the economic, institutional, and historical contexts in which those solutions operate.

c. I recommend that Arch. Todorov expand the comparative analysis to include other models of organising architectural and design activities. Particularly relevant examples include London, Paris, the United States, Dubai, Singapore, and China. In large and complex investment projects, it is difficult to apply a model based on a single independently practising architect, even where that architect possesses a high level of professional competence. The legal framework should nevertheless allow for different forms of organisation, including the generalist, theoretician, researcher, technocrat, and other professional profiles. The scientific analysis would benefit from recognising this diversity.

d. I recommend that Chapters Three and Five be removed from the main body of the dissertation. The arguments supporting this recommendation have been set out in the respective sections above.

e. I recommend that the academic unit undertake a systematic review of the experience accumulated during the doctoral procedure and consider possibilities for improving the organisation of doctoral education, academic supervision, and the internal procedures for preparing dissertations. A substantial proportion of the critical observations contained in this review relates precisely to these aspects.

13. Personal Impressions

Arch. Stoyan Todorov is a practising architect with substantial professional experience, particularly as a “**generalist**”. I view positively and highly value his personal professional commitment to achieving better conditions for the practice of architecture in Bulgaria. This commitment deserves support and respect.

14. Recommendations for the Future Use of the Dissertation’s Contributions and Results

Following appropriate editorial revision, I recommend that the dissertation be published and that its findings and conclusions be brought to the attention of the governing bodies of the **Chamber of Architects in Bulgaria, the Chamber of Engineers in Investment Design, and the Bulgarian Construction Chamber**.

CONCLUSION

The dissertation contains scientific, scientific-applied, and practical results that are relevant to the development of architectural practice and that are presented in accordance with the requirements of the **Law on the Development of the Academic Staff in the Republic of Bulgaria**, the Regulations for its implementation, and the relevant regulations of Varna Free University “Chernorizets Hrabar”.

The dissertation demonstrates that the doctoral candidate, **Dipl.-Ing. Arch. Stoyan Todorov**, possesses in-depth theoretical knowledge and professional competence in Professional Field 5.7, Architecture, Construction and Geodesy, and demonstrates the ability to conduct independent scholarly research.

In view of the considerations set out above, I give a **positive assessment** of the research undertaken, the submitted dissertation and abstract, the results achieved, and the contributions formulated by the doctoral candidate.

I therefore recommend that the distinguished Scientific Jury award **Dipl.-Ing. Arch. Stoyan Todorov** the **Doctoral Degree (PhD)** in the field of higher education and Professional Field 5.7, Architecture, Construction and Geodesy, Doctoral Programme *Architecture of Buildings, Structures, Facilities and Details*.

1 September 2026

Reviewer:

Prof. Dr. Arch. Ivan Danov