Determining effectiveness in heritage impact assessments

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ABSTRACT

As a result of ratifying the World Heritage Convention, signatory parties undertake to protect World Heritage properties by ensuring that there is no impact on outstanding universal value (OUV). Heritage Impact Assessment (HIA) has been developed by the International Council on Monuments and Sites (ICOMOS) as a tool to identify threats to OUV, but there are concerns that the focus on HIA effectiveness is too procedural and not substantively focused on protecting the attributes that are recognized as being OUV. This paper discusses the application of a framework to determine the effectiveness of (cultural) heritage impact assessments, distinguishing significance, change agents, management, impact and effectiveness assessments, to better address potential shortcomings.

INTRODUCTION

When ratifying the World Heritage Convention, States Parties agree to assure the effective implementation of any measure to protect World Heritage properties. They need to make sure development or change does not impact negatively on the outstanding universal value, integrity and/or authenticity of the property. Despite this, management deficiencies and aggressive development are the two major threats to World Heritage properties. Even though there is much research addressing these two major threats, they lack a clarification of the nature of the management deficiencies or a definition of an aggressive development, and this is a barrier to protection. This paper elaborates on two potential contributors to this knowledge gap. First, the difference between the assessment frameworks used for tracing changes in protected urban areas, often performed by conservation officers, and those used for tracing changes in impact assessments, often performed by planning and/or building officers. Second, the pre-conception that management practices are change agents that can threaten protected urban areas. As such, these practices are handled as a "cause of the disease", instead of being handled as a "treatment to cure", and that can be ineffective. This paper presents the results of a literature survey on heritage impact assessments currently being applied to World Heritage and their criteria. A framework is derived to determine the effectiveness of (cultural) heritage impact assessments, distinguishing significance, change agents, management, impact and effectiveness assessments. Discussion is raised on its contribution to the global target of enabling cultural heritage protection while allowing their urban context to develop sustainably.

CONSERVATION VERSUS PLANNING ASSESSMENTS

Current Environmental Impact Assessment (EIA) studies are widely known as a suitable approach for assessing the impacts of development projects on the environment (Glasson *et al.*, 2012). Furthermore, all countries in the world have some form of legal or administrative requirement for EIA (Morgan, 2012). However, while cultural significance and sustainability are multi-dimensional, current environmental

assessment (EA) tools are mostly single-dimensional (Ding, 2008). Moreover, cultural heritage is generally the weakest component in EIA studies (Bond et al., 2004; Fleming, 2008). There is a lack of objectivity and completeness in heritage impact assessments (HIA), even when part of an EIA (Teller and Bond, 2002). EIA is also considered to neglect the interaction between attributes and "cumulative impacts and incremental changes" (ICOMOS, 2011). Thus, there is an unanimous plea for a more global and objective assessment approach to cultural protected areas, directly linked to their cultural significance. SUIT (Sustainable development of Urban historical areas through an active Integration within Towns - http://www.lema.ulg.ac.be/research/suit/) was a European Commission funded project developed as a "flexible and consistent Environmental Assessment methodology to assist with the active conservation of historical areas" (Dupagne et al., 2004). RE-ARCHITECTURE was another European Commission co-funded project (www.re-architecture.eu) developed to assist practicing architects in integrating heritage (impact) assessments on their design process, in order to raise the sustainability of their design proposals, and subsequently contribute to the protection of both natural and cultural resources (Pereira Roders, 2007). Both prototypes had only been tested within Europe and focused on supporting a specific stakeholder group, respectively, the experts assessing development proposals and those designing them. No other comparable research was found at international level, or on inventorying the effectiveness of the heritage (impact) assessments currently being applied to protected urban areas.

MANAGEMENT PRACTICES AS CHANGE AGENTS

The duty to ensure the "identification, protection, conservation, presentation and transmission to future generations" (UNESCO, 1972) of World Heritage properties is now shared by nearly all countries of the world. Still, there is a great gap between tracing global targets for cultural areas as opposed to natural protected areas. Such a gap is detrimental to cultural protection, and it also prevents the tracking of progress towards global targets for protected areas. One important difference may be how cultural and natural heritage perceive management practices. Management deficiencies are by many perceived as a threat to cultural heritage properties (Addison, 2007; ICOMOS, 2005; Pereira Roders, 2010; Turner et al., 2011). By contrast, in natural heritage conservation, stakeholders are largely focused on assessing the effectiveness of management approaches (Leverington, 2010) leading to considerable research and academic debate (see, for example, Bruner et al., 2001; Chape et al. 2005). A particular driver behind this is the variety of non-governmental organisations with a vested interest in the use of the natural habitat. For example, the Royal Society for the Protection of Birds (RSPB) in the UK has more than one million members which exceeds the total for all the political parties combined, and is thus a powerful force when it comes to ensuring that a natural habitat of importance to birds is managed to achieve its objectives, rather than simply managed in line with set procedures and practice. In environmental impact assessment, this reflects a difference between what is termed 'procedural effectiveness', the extent to which management stages have been properly undertaken, and 'substantive effectiveness' the extent to which the intended outcomes have been achieved (Sadler, 1996). In cultural heritage management this distinction is not recognised and the involved stakeholders, in the absence of large and thus powerful boundary organisations (like RSPB for bird habitats), are focused on management compliance and not management outcomes.

HERITAGE IMPACT ASSESSMENTS AND WORLD HERITAGE PROPERTIES

The International Council on Monuments and Sites (ICOMOS) has recently published a crucial guidance on HIA specific to cultural WH properties, to fill the gap and contribute to an effective impact assessment "of potential development on the Outstanding Universal Value (OUV) of properties" (ICOMOS, 2011). It is addressed to managers, developers, consultants and decision-makers, but also to the WH Committee and States Parties. ICOMOS is the Advisory Body to the World Heritage Committee for cultural World Heritage properties. ICOMOS gives ten main recommendations related to HIA. These are respectively (Pereira Roders and Van Oers, 2012):

- 1. The (broadness of the) HIA team
- 2. The (early consultation with) relevant parties
- 3. The (training of the) involved parties
- 4. The (appropriateness of the) commissioning of the HIA process
- 5. The (full and effective) use of HIA output
- 6. The (transparency of) HIA reports
- 7. The (feed back into) the design process
- 8. The (adequacy of) the HIA tools
- The (good) understanding of the WH property, its significance and OUV, its attributes and its context
- 10. The baseline data about the WH property and its condition

ICOMOS (2011) relates the cause of inefficiency on HIA or similar practices to being "not clearly and directly tied to the attributes of OUV". That becomes even clearer when addressing States Parties who apply statutory environmental impact assessments. Accordingly, "where cultural heritage sections of EIAs clearly do not focus on the attributes of OUV, they would not meet desired standards in managing change at WH properties" (ICOMOS, 2011). Yet, the main aim of a HIA is to assess the impact of development projects or policies and prevent those that adversely impact on the attributes of OUV. Therefore, can a HIA which is not clearly and directly tied to the attributes of OUV, be considered as inefficient? Or, should one better focus on preventing development considered detrimental to the attributes of OUV from being implemented? The ICOMOS guidance does seem to focus on procedural efficiency, rather than on the intended outcomes.

THE HIA EFFECTIVENESS FRAMEWORK

Figure 1 illustrates the framework proposed to assist determining the effectiveness of management practices, including HIA practices. It attempts to guide HIA, and the relationships between the five key sub-assessments. The framework is subdivided into five sub-assessments. Those are respectively: the protected urban areas, the change agents and management practices. The impact assessment of the change agents on the protected urban areas and the effectiveness assessment of management practices applied to protected urban areas need the input from the previous three assessments. A protected areas assessment is also known as cultural significance assessment and often found summarized in a Statement of Significance (SOUV for World Heritage properties). They are used for defining the cultural significance conveyed on the cultural heritage properties and/or for monitoring their state-ofconservation in time. The change agents assessment deals with the factors, eminent and potential, found affecting the protected areas, often referenced as the threats or causes for the degradation of the stateof-conservation of a cultural heritage property. The management practices assessment focuses on the procedural effectiveness in terms of the stakeholders involved, their actions and tools. HIA, as earlier explained, regards the assessment to determine the impact of change agents in protected areas, designated as cultural heritage. Instead, the effectiveness assessment, regards the contribution of the chosen management practices, including HIA, to achieve the targeted goals on the protected areas and change agents.



Figure 1. The HIA effectiveness framework, and inter-relation between the five key sub-assessments

DISCUSSION AND CONCLUSIONS - A SWOT ANALYSIS

Impact assessment literature reveals that there is a tendency to focus on procedural requirements at the expense of intended outcomes, this is because "in a broad constitutional and governance sense, decisions, and decision-making processes, are ultimately controlled by courts" (Craig and Jeffery, 2013). For this reason, undue emphasis is often applied to management steps, and also the procedural stages of impact assessment conducted on change agents or protected urban areas. However, the key outcome in HIA should be the protection of the attributes of OUV and, based on this premise, Table 1 presents some strengths, weaknesses, opportunities and threats associated with the implementation of the framework in figure 1, with a view to a stronger focus on substantive outcomes. This SWOT analysis is mainly based on existing literature and experience with the application of Environmental Impact Assessment to projects developed in heritage sites. By nature, it should be considered that some of the weaknesses or threats identified here could be addressed by an adequate design of the HIA effectiveness framework. Further research on the ICOMOS HIA recommendations is hence needed, in order to continue clarifying and raise understanding for the role of HIA in WH management, and more generally in cultural heritage management. To classify HIA recommendations as efficient may not be enough. Research is needed to verify its efficiency e.g. comparing the results on State of Conservation of WH properties where HIA or similar practices are applied as guided by ICOMOS with the results from those where other practices were applied. There is great need for monitoring changes and assessing the impact of development projects on WH properties in order to prevent their cultural significance from being destroyed. Yet, also the effectiveness of HIA should not be underestimated as they might be generating misleading results. Thus, many doors are ready to be opened by further research. There is much to learn from the related field of Environmental Impact Assessment where the pursuit of effectiveness has a long history (Cashmore and Bond, 2009).

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Strengths	Weaknesses
 Increases objectivity related to individual assessments; Long term improvements in assessments; Better protection of OUV attributes; Clearer understanding of key threats and causes to OUV attributes; Clearer understanding on the level of integrity of OUV attributes; Acknowledges and considers both substantive and procedural effectiveness; Greater legibility of the overall system and potential conflicts, especially when one actor/agent belongs to different sub-systems — e.g. change agent, part of management structures and involved in HIA. 	 Introduces another layer of assessment and cost; No short-term improvements in protection of OUV attributes; Lack of enforcement routes; Lack of capacity to undertake effectiveness assessment; Lack of time; May not be adapted to situations where lack of change —e.g. musealisation— would constitute in itself a threat to heritage conservation; Lack of means to capitalize experience and knowledge gained from effectiveness assessment.
Opportunities	Threats
 Increased dialogue between different set of cultural heritage stakeholders; Clearer understanding of key threats to OUV attributes; Preparation of clearer, more focused, guidance; New research agendas focused on HIA effectiveness; Potential to develop standard impact templates for specific change agents; Periodic revision of global targets and management practices, following experience gained through effectiveness assessment. 	 Lack of political buy-in from key stakeholders; Increased budgetary requirements impacting on existing heritage protection and management budgets; Lack of consensus on critical elements of effectiveness; Lack of funding; Misuse of the transparency to destroy the OUV attributes; Adoption of a reactive rather than preventive approach to conservation in case of framework misinterpretation.

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