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## Deliverable D2.1: Mapping of Best Practices

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## Executive Summary

The SoPHIA project aims at developing a holistic impact assessment model of cultural heritage. A crucial step in creating the model is the identification and mapping of existing impact assessment practices in cultural heritage. To identify exceptionally well done as well as poorly done practices, the SoPHIA consortium consulted its Advisory Board members and stakeholders. This community of practitioners is an integral part of the consortium and represents the project's most valuable resource.

The Advisory Board members were asked which cases of impact assessments in cultural heritage they consider well/poorly done and what reasons characterized the cases as such. The results from the consultation process, implemented via open questionnaires were manifold.

- Firstly, the majority of practices reported by the stakeholders refers to the implementation of the Heritage Impact Assessments for Cultural World Heritage (HIA). These practices had been classified either as rather positive or rather negative examples of impact assessment, whether the HIA method had been applied with a holistic and inclusive approach or not. In fact, as underlined by our interviewees, issues such as who commissions the assessment and what it is used for, represent decisive factors when aiming at a holistic impact assessment in cultural heritage. Moreover, the resources available (both in terms of funding and time) for the assessment play a crucial role in ensuring the efficacy and quality of the assessment (chapter 2). The fact that financial and time resources are crucial in defining the method and period of assessment have also been confirmed by other good practices (not using HIA model) presented in chapter 3 of this report.
- Secondly, practices understood as rather positive examples of holistic impact assessments are often related to projects, programmes, and interventions that had a holistic and participatory approach themselves. That means, the probability of a holistic and participatory assessment process is high if the case assessed is characterized by a holistic and participatory process itself.
- Thirdly, and adding to the previous conclusions, transparency in terms of the management commitment to assessing the impact of a respective intervention and transparency in terms of the funding for assessments and monitoring is crucial in developing adequate methods and forms of holistic impact assessments. Because even if commitment is low and resources are limited, the

impact assessment framework may be adapted accordingly to achieve a holistic minimum standard.

- Finally, a poorly done practice listed in the analysis (chapter 4) as well as other references from the questionnaires have shown that national legislation can powerfully support the commitment to and the implementation of holistic impact assessments in cultural heritage.

For the development of a holistic impact assessment model in cultural heritage, the findings reported in this deliverable suggest that a reflection on issues related to objectives and commitment, resources, and legislative obligations, should be preliminary to the finalization of the holistic impact assessment model.

## 1. Aims and Methodology

The SoPHIA project seeks to propose a holistic impact assessment model for historical, environmental, and cultural heritage sites in Europe. It represents a new approach to impact assessments in cultural heritage based on three axes:

- People: the multi-stakeholders perspective;
- Domains: an inter-dimensional view that takes into account the positive and negative externalities that occur within and between the four domains (social, economic, environmental and cultural domain);
- Time: a longitudinal perspective, which takes into account the ex-ante, ex-post impact assessment.

D. 2.1 takes the next step in developing the impact assessment model by identifying cases of existing impact assessment practices and their applicability. D 2.1 therefore aims at collecting information on well and poorly done practices. For this reason, SoPHIA's Advisory Board members and stakeholders were asked to share their thoughts and experiences on good and poorly done practices in cultural heritage impact assessment via an open questionnaire.

### 1.1 The Questionnaire

A holistic approach, a multi-stakeholder perspective and longitudinal time horizons are, in the SoPHIA project, considered crucial for valuable practices of impact assessments in the field of cultural heritage. Therefore, the questionnaire asked about reasons why practices were considered well done; how the mentioned practices of assessments were holistic in their approach; have they included various stakeholders; and whether the time horizon of the assessments was considered appropriate by the interviewees. The questionnaire was structured as follows (the whole questionnaire can be found in the annex).

#### Good Practices

- Knowledge of cases considered exceptionally well done
- Role of the interviewee in these cases
- Characteristics of the case
- Holistic aspects of the impact assessment
- Inclusion of stakeholder perspectives in the impact assessment
- Time horizon of the impact assessment

#### Poorly done Practices

- Knowledge of cases considered poorly done
- Role of the interviewees in the cases
- Characteristics of the case
- Holistic aspects of the impact assessment
- Inclusion of stakeholder perspectives in the impact assessment
- Time horizon of the impact assessment

## 1.2 Distribution of Questionnaires

The questionnaires were distributed via email to SoPHIA's Advisory Board members and stakeholders<sup>1</sup> on 26th of August 2020 with the request to return them by 16<sup>th</sup> September 2020. Furthermore, additional potential stakeholders were approached via the networks of the project partner organisations and via the social platform established by the project (<https://sophiaplatform.eu/en>).

## 1.3 Responses

In total, 24 questionnaires were returned. Almost half of the questionnaires referred to one practice, classifying it as either good or poorly done practice. A few stakeholders also named two or three cases of good and poorly done practices. Furthermore, the majority of stakeholders did not classify the practices as entirely positive or negative and pointed at specific aspects that were good and/or poorly done. Finally, in many of the questionnaires the name of the practice(s) that it referred to was(were) not indicated.

In the next chapter, a complete analysis of the data retrieved from the questionnaires will be presented, as following:

- *Reflection on practices using HIA as a model of impact assessment in cultural heritage:* Since many respondents referred to various cases of Heritage Impact Assessments for Cultural World Heritage (HIA's), rating them as good as well as poorly done practices of impact assessments, this chapter provides an overview of the main challenges and opportunity of HIA as an impact assessment model as highlighted by the respondents.
- *Examples of Good Practices:* This chapter refers to six main practices that were referred to in the questionnaires. The analysis focuses on these six practices, since information on these cases provided by the respondents was broad.
- *A Poorly done Practice Example:* In this chapter only one bad practice is analysed. Other practices that were estimated to be poorly done by the stakeholders have mainly been HIA's or examples for which no name reference or detailed information was available.

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<sup>1</sup> The complete lists of Advisory Board Members and Stakeholders, please visit SoPHIA platform: <https://sophiaplatform.eu/en/advisory-board>

- *Common findings:* In this last section, information from the main examples as well as relevant insights from questionnaires that did not refer to a specific practice are summarized.



## 2. Reflection on Practices using HIA

Many of the consulted stakeholders referred to HIA as a form of impact assessment in cultural heritage. Following HIA practices were listed as positive and/or negative examples of HIA's:

- HIA on the wider area of Srđ in the context of the project “Baština – pokretač razvoja”
- HIA framework for the Old City of Dubrovnik World Heritage
- HIA of the Master Plan for the development of Functional Region South Dalmatia
- HIA Sports and Recreation Centre with a golf course and the Bosanka North and Bosanka South Tourist Resorts, Dubrovnik
- HIA Belvedere Redevelopment Project, Dubrovnik
- HIA Urban Development Plan for settlement for the veterans on Nuncijata, Dubrovnik
- HIA Urban Development Plan 2.2. "St. Jakov", Dubrovnik
- HIA a new railway transit system, Melaka
- HIA Golden Horn Metro Bridge Project, Istanbul
- HIA Orange Metro Line, Lahore
- HIA Waldschlößchen Bridge, Dresden

The commonality of the listed practices is their implementation according to the ICOMOS guidelines (ICOMOS 2011). In January 2011, ICOMOS provided guidelines on the implementation of HIA's. These were developed to record the threat to the exceptional universal value of world heritage sites.

SoPHIA stakeholders argue in the questionnaires that the HIA model can be applied holistically, especially because the ICOMOS guidelines require and expect a holistic approach.

“This framework, if it is used properly, ensures that all aspects of the impacts are taken into consideration.” (response from the SoPHIA stakeholder survey)

According to one SoPHIA stakeholder's experience, the application of the guidelines was “holistic substantially enough”. However, the stakeholder posed a question: who defines how holistic a HIA must be?

“Holistic approach is expected and required by the ICOMOS guidelines. However, reflecting on the question, a counter question might be posed: just how inclusive and how holistic would a HIA have to be? In my view and from my experience so far,

a HIA has to be effective and rationally manageable as process and a document (timeframe, scope, team, budget, etc.), and this inevitably imposes certain limitations. Who is the entity which would certify a presumed/required holistic minimum?” (response from the SoPHIA Stakeholder survey)

The difficulty of defining what is methodologically required to be holistic and inclusive in terms of various multi-stakeholder perspectives is also reflected in the fact that some cases of HIA's were judged by SoPHIA stakeholders as holistic and inclusive, others were not. That means that the HIA framework, from the perspective of the SoPHIA stakeholders, can be applied holistically and inclusive. However, at the same time the framework does not guarantee that holistic and inclusive standards are followed.

There has been also critique on the HIA in scientific debates in the last years. Therein, the term of “extraordinary universal value” has been repeatedly criticized, because it can reproduce dominant perspectives and interests on cultural heritage and runs danger of excluding certain (marginalized) topics and population groups as well as their history and values (Lambadi, 2007); relationships between local cultures are also ignored (Grenet, 2019). Therefore, scientists (Yu, 2018) propose a holistic approach to the assessment of cultural heritage which can capture interpersonal relationships and thus offers an inclusive orientation that includes different perspectives on cultural heritage.

The possibility of a holistic approach to the impact assessment in the field of cultural heritage through the ICOMOS guidelines is also offset by the criticism that the guidelines are based on the preservation discourse. This understanding of cultural heritage focuses on the intrinsic, universal, and unchangeable values of monuments that need to be protected from spatial development (Ashworth quoted from Patiwaël, 2019, p. 336). This discourse contrasts, above all, with a discourse on planning (“heritage planning discourse”), which understands cultural heritage as “the contemporary use of the past” (ibid.). Patiwaël et al. argue that the focus of the ICOMOS guidelines on a static understanding of the “extraordinary universal value” of cultural heritage contain an inherent discourse on preservation. At the same time, they show that practitioners who apply these guidelines also have different understandings of cultural heritage and, therefore also methodological uncertainty in the application of the HIA and the ICOMOS guidelines can be observed. This can result in:

“possible miscommunication and misunderstanding about the HIA procedure, the perceived purpose of HIA, and the way impacts are assessed. The implicit purpose of HIA in the HIA Guidelines (as the protection of OUV [outstanding universal value]) limits the potential of HIA because it ignores other potential purposes [...]. Different views on heritage values, the disciplinary background of the HIA practitioners, and the differing agendas of different stakeholders can affect the outcome of an HIA.” (Patiwaël et al, 2019, p. 344)

This assessment by Patiwael et al. has been repeatedly mentioned and recommended by stakeholders consulted during this phase of the SoPHIA project. Furthermore, the reflection of experiences in the implementation of HIA's by the stakeholders show that when assessing interventions in the field of cultural heritage, the "exceptional universal value" of a cultural heritage site often conflicts with issues of socio-economic development or environmental challenges. Among other things, HIA's in Istanbul, Dresden, or Dubrovnik are cited by the stakeholders. In Istanbul, a potential threat to the extraordinary universal value of the city's historic peninsula from an infrastructure project, the Metro Bridge over the Golden Horn, had to be assessed. The example is reminiscent of the Dresden bridge dispute, which ended with the revocation of the world cultural heritage seal and the construction of the Waldschlößchen bridge over the Elbe, whereas adjustments to the bridge in Istanbul were classified as sufficient to retain the status of cultural heritage on the Golden Horn. In the example given in Dubrovnik, the question of the protection of the world cultural heritage in Dubrovnik faced a tourist projects as well as residential building projects in the city.

The SoPHIA stakeholders furthermore emphasized that issues, such as who commissions the assessment and what it is used for, represent the decisive factors for the implementation of HIA's. One of the consulted stakeholders reported on the example of an HIA commissioned by the Malaysian Commissioner for Cultural Heritage:

"[...] it was to look at the World Heritage Site (historic urban centre, dating of 19century) to convince the government to support the commissioner in stopping the industry of birds nets in the historical buildings. [...] This HIA provided the Heritage Commissioner with the tools to defend why raising birds in houses was unacceptable by all international standards before her government and so to get rid of this practice. Not only it damaged the building structure, but also had an impact on the living intangible attributes of this world heritage property. This HIA, acted as a specific management tool, and was a good example in covering both of the tangible and intangible aspects; and, also, how HIA can be used for a very specific, almost political purpose." (response from the SoPHIA stakeholder survey)

This shows that the course of an HIA and of any commissioned evaluation crucially depends on the purposes behind it, as well as the needs and the ideas of the party commissioning it. Furthermore, the position of the initiating party, will also be reflected in the resources available for the assessment. Consequently, to provide the grounds for transparent assessment, it also must be made transparent what purposes the impact assessment is motivated by and why it is implemented.

### 3. Examples of Impact Assessment Practices, other than HIA

Apart from the HIA impact assessment model, the consulted stakeholders also referred to a range of other practices of holistic impact assessment approaches they considered successfully implemented. These are cases of interventions in cultural heritage for which a monitoring and evaluation framework/tool has been applied or developed in a specific context.

Following examples have been listed as good practices and a case that has been referred to as a poor practice of an impact assessment in cultural heritage.

<i>Location/context of IA</i>	<i>Framework/tool developed and/or applied for IA</i>	<i>Stakeholders' evaluation</i>
Liverpool as the European Cultural Capital in 2008 (United Kingdom)	Impact 08	Good practice
European Heritage Label Programme (Europe)	Interim Programme Evaluation according to Better Regulation standards	Good practice
Medvenica Nature Park (Zagreb)	Feasibility study developed under national law	Good practice
Jamtli New Village (Sweden)	IA as a practice embedded in the management of the site	Good practice
Palazzo Merulana (Italy)	Sustainability report	Good practice
Urbino as a UNESCO site (Italy)	IA embedded in the management plan of the UNESCO site	Good practice
Mullagmore/Luggalla visitors centre (Ireland)	Environmental impact study	Poor practice

Table 1: Examples of good and poorly done practices (not using HIA method)

For each of these examples, the context and/or and the characteristics of the intervention will be briefly described. The objective is to offer further insights for a final reflection on elements that affect the success or failure of impact assessments in cultural heritage.

### 3.1 Liverpool – Impacts 08

A holistic assessment model that has been developed to capture an intervention in the cultural area, although not exclusively in the cultural heritage field, is the Impacts 08 model, developed for the monitoring and assessment of Liverpool as the European Cultural Capital in 2008. The model has been mentioned by stakeholders as a renowned framework of assessing impact. One of the main researchers associated with Impacts 08, Beatriz Garcia, is also Advisory Board member of the SoPHIA project. The model was developed by the University of Liverpool to accompany Liverpool being the European Capital of Culture (ECoC) in 2008 and assessing its impact. Liverpool's ECoC project exceeded the scale, resources, and capacities of other EcoC's. In this context also the model was awarded with much better resources than impact assessments in the cultural area are usually provided with. It was a five-year joint initiative of two universities in Liverpool, the University of Liverpool, and Liverpool John Moores University. It was funded and commissioned by the Liverpool City Council for the period from 2005 to 2010.

The research started already three years before the ECoC year 2008. From the start, the assessment had a longitudinal character that included an evaluation and monitoring of the project before, during, and after the intervention. By these means, the assessment was able to grasp the outcome as well as the process of the intervention and did so based on a broad narrative of culture, that goes far beyond the understanding of "cultural festival". Impacts 08 defined multiple dimensions of impact, considering positive as well as negative impacts that can derive from the ECoC year. In total, five main thematic clusters of impact were defined by the project, data was collected and assessed by these measures. The areas included the following:

- city image and reputation;
- cultural participation and access;
- cultural and creative vibrancy;
- economic and tourism development;
- cultural governance and leadership.

Ten years after the intervention, the Impact08 initiative defined additional areas of long-term impact that were considered:

"For 2018, additional emphasis will be placed on the assessment of long-term impacts on citizens wellbeing, city identity and local self-perceptions. Data across all of these themes will be analysed with a view to determining how durable the effects of the ECoC on these areas have been in the time that has elapsed since 2008."<sup>2</sup>

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<sup>2</sup> <http://www.beatrizgarcia.net/projects-newer/impacts18-ecoc-legacies-10-years-on/> [accessed 03/12/2020].

The final report of the Impacts 08 project describes the main outcomes for the research. Apart from the longitudinal impact analysis that was implemented with a wide range of stakeholders, three other points are emphasized that reflect on the possible role that impact assessments may take in the cultural area and in cities:

- First, “an enhanced evidence base for the multiple impacts of culture upon regeneration and city renaissance, which has assisted local and regional cultural planning as well as informing the UK national debate.”
- Second, “the provision of intelligence to guide decision-making for the Liverpool ECoC delivery team.”

And third, “the legacy of a replicable research framework, which can be used to explore the impacts of culture-led regeneration programmes beyond Liverpool and 2008.” (Garcia et al., 2010, p. 4)

The researchers of Impacts 08 tested the transferability of the model after it has been developed for Liverpool. It was applied in the case of the European Parliament review of ECoC’s from 1985 until 2019. As Beatriz Garcia emphasized in the SoPHIA workshop, the framework from Liverpool was adapted to existing data from 60 other cases, developing a new approach of modelling in which the different identified areas of impact were fit to the different areas of strategic thinking, programming, and setting up that explain the logic of an intervention.<sup>3</sup>

### 3.2 European Heritage Label Action

The evaluation of the European Heritage Label action (EHL) has been considered an important practice of impact assessments in cultural heritage by the SoPHIA stakeholders, since the action is a flagship programme of the EU in the field of common cultural heritage and since it represents an interesting practice of an interim programme evaluation carried out on the European level.

The action was externally evaluated for the first time in 2018 after the first six years of its existence (2011–2017). It assessed the relevance, coherence, efficiency and governance, effectiveness and EU added value of the action. However, since the EHL was already an intergovernmental action from 2006 until 2011 forward, also impact assessments done earlier (like in 2010) were a reference to the evaluation. Furthermore, monitoring and panel reports that were done since the EHL became an EU action, were an important source for the evaluation. By these means it was possible for the programme evaluation to rely on earlier assessments that also gathered data that were relevant to the research questions. In terms of a longitudinal approach, it therefore has to be noted that the evaluation was carried out in the course of 11 months yet, the existing on-going programme monitoring was supportive in terms of a long-term

<sup>3</sup> <https://sophiaplatform.eu/en/meetings/workshops/workshop-1> [accessed 03/12/2020].

perspective on the programme. This internal monitoring considers a variety of different indicators of different social, cultural, economic, and ecological dimensions such as identity, access, education, tourism, preservation, etc.

Concerning the methodology of the external evaluation, two broad types of methods of data collection were employed: desk research and stakeholder consultations. The latter included an open public consultation (OPC) process, interviews, and focus groups. By these means a multi-stakeholder perspective in the evaluation of the EHL programme was ensured. As highlighted by the SoPHIA stakeholders, this form of multi-stakeholder perspective was specifically required by the contracting authority.

“The inclusion of stakeholder perspectives via the OPC and other forms of data collection were explicitly requested by the European Commission and were a prerequisite in order to be commissioned with the implementation of the evaluation” (response from the SoPHIA stakeholder survey)

The OPC was a minimum standard in the request for services by the EC and was in accordance with Commission’s Better Regulation Guidelines. These guidelines define standards and key principles for impact assessment commissioned by the EC as well as principles of monitoring.

“‘Better regulation’ means designing EU policies and laws so that they achieve their objectives at minimum cost. [...] It is a way of working to ensure that political decisions are prepared in an open, transparent manner, informed by the best available evidence and backed by the comprehensive involvement of stakeholders.” (European Commission 2017, p.4)

In this document the EC defined the minimum standards in terms of a multi-stakeholder perspective of impact assessments. Furthermore, it is noted in the document that the

“Commission’s impact assessment system follows an integrated approach that assesses the environmental, social and economic impacts of a range of policy options thereby mainstreaming sustainability into Union policymaking.” (European Commission 2017, p. 9)

In this way, the Better Regulation Guidelines also define standards in terms of a holistic understanding of impacts. In addition, the EHL evaluation was led by the objectives of the programme as well as the objectives in terms of cultural policies on the European level in general. These objectives are based on policy goals that were determined in the New European Agenda for Culture that defines strategic objectives in the social, economic, as well as external dimension. So also, here, a rather broad understanding in terms of potential impacts and the attainment of objectives can be observed.

### 3.3 Medvenica Nature Park

Another individual case that has been identified and highlighted as a good practice of impact assessment is Medvenica Nature Park. The Medvenica Nature Park is located north of Zagreb, and is a popular recreational area for many, including the people from the capital of Croatia. More than a quarter of Croatia's population lives in the Park's surroundings. The park itself stretches over 18 hectares, with 81% of the park's area covered by well-preserved forest, as well as a medieval castle and the Veternica Cave being located in the area.<sup>4</sup>

“Mount Medvenica is a very rare example of a nature park merging with a capital city. It is the area in which natural, cultural and historic values interlace and depend on each other.”<sup>5</sup>

In the exchange with stakeholders of the SoPHIA project, it has been highlighted that the process of the preparation and realization of the Nature Park Medvenica had to satisfy procedures under two Croatian national laws, the nature protection law, and the cultural heritage protection law. Due to the obligation under the national legislation, the project of the Public Institution Nature Park Medvenica had the obligation to implement a pre-feasibility as well as a feasibility study in accordance with EU recommendations. The impact was assessed in the environmental, economic, social, and cultural domains with several different methods applied, such as a financial and economic impact analysis, demographic and spatial impact analysis, socio-cultural impact analysis, and environmental impact analysis (response from the SoPHIA Stakeholder Survey).

According to the information from consulted stakeholders, the impact assessment also included a multi-stakeholder perspective, with the following stakeholders being consulted and involved in the analyses:

- local authorities;
- local tourism representatives and event industry representatives;
- educational institutions;
- other main stakeholders such as representatives from the Croatian forests, the City of Zagreb roads, police, and Croatian Mountain Rescue Association. (response from the SoPHIA Stakeholder Survey)

A broad range of stakeholders has also been consulted in the preparation of the project itself via so-called multi-stakeholder forums. Therefore, similarly to the cases listed

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<sup>4</sup> <https://www.interreg-central.eu/Content.Node/Nature-Park-Medvednica.html>;  
<https://www.pp-medvednica.hr/en> [accessed 03/12/2020].

<sup>5</sup> <https://www.pp-medvednica.hr/en/> [accessed 03/12/2020].



above, the project development and implementation as well as the impact assessment took various perspectives and positions from stakeholders into account.

### 3.4 Jamtli New Village

The Jamtli New Village was a project implemented by the Jamtli Open Air museum in Sweden that is located in the municipality of Östersund about 600 kilometres North from Stockholm. The museum includes a permanent exhibition about the region's past as well as temporary exhibitions of arts and handicrafts. Departing from an understanding that the museum needs to represent the whole population and to be accessible to all people, the board of the Jamtli foundation decided to initiate a brave project in the middle of the refugee movement to Europe in 2015.

“In late September 2015, the board of Jamtli Foundation decided to look into the possibility of building houses at the museum site which could offer relatively cheap but good quality housing especially for families in need.” (Zipsane, 2016, p. 31).

From then on, 17 houses were built in 2016 and 2017. By the end of 2019, approximately 40 people with refugee background lived in the houses. In the phase of building the houses, the museum worked closely together with the Östersund municipality and a local housing company. The long-term goal of the project was to support the museum in its development as an intercultural meeting place. The idea was to promote intercultural dialogue in the spirit of the European learning approach, especially by promoting the exchange with staff and tenants. This view was clearly communicated by the management of the Jamtli museum to the tenants of the village and the museum staff and continuously assessed.

Therefore, the idea of the assessment at Jamtli New Village as well as its relevance to impact assessments in cultural heritage lie in the fact that the project is continuously assessed according to its objectives and that the results of the assessment are played back into the management of the museum. Since its beginnings, the volunteer manager at the museum reported on it to the director of human resource development and the estate manager reported on technical issues and maintenance of the village:

“The assessment method is good practice because it is efficient and did not end with erecting the houses. [...] The impact assessment is holistic in the sense that all aspects which are considered relevant by the tenants and the staff are documented and acted upon. In collaboration with the local municipal authorities and the government local employment office the integration process is monitored. This is also documented continuously.” (response from the SoPHIA Stakeholder Survey)

Furthermore, all the relevant stakeholders are included in the assessment, especially also the tenants as well as the staff and the local authorities.

“[The assessment has been implemented] during the erection of the village and since the village is included in ordinary activities within the museum. That means that economic, social and incident reports are produced continuously by staff beside the documentation already mentioned. There should be little risk that important aspects related to the aim of the intervention are not observed.” (response from the SoPHIA Stakeholder Survey)

The impact assessment has thereby become integrated in the management of the museum, with the principles and aims of the project thereby also becoming an integral part of the museum as a whole. The case represents an important example of how the issue of monitoring and assessing the impact of a specific project can be embedded in the management process and thereby ensure sustainability of monitoring and reporting as well as increase the opportunity of participation of all stakeholders in the process.

### 3.5 Palazzo Merulana

Palazzo Merulana has been also a good practice case highlighted by stakeholders of the SoPHIA project in terms of its practice of assessing and reflecting its cultural, social, economic, and environmental sustainability.

Palazzo Merulana is a museum of contemporary art that was opened in the city of Rome in 2018. As pointed out by a stakeholder, the strategy of Palazzo Merulana combined two objectives. Firstly, the palazzo aims at an artistic brand reputation that should not be limited to the local area of Rome or the district where the museum is located. Secondly, Palazzo has been developed with a community and social mission linked to the local area it is located in the district of Esquilino. Adding to this, Palazzo Merulana was re-built and developed in a Private-Public-Partnership scheme, with the Palazzo itself being a non-profit institution with no public subsidies. (response from the SoPHIA Stakeholder Survey)

“In our interpretation the innovative core of Palazzo Merulana cultural strategy is the experiment of an integration between a museum model based on artistic brand (starting from the importance of the hosted permanent collection and the quality of proposed exhibitions) and a museum model based on the empowerment of cultural vibrancy existing in the local community of the district of Esquilino and, in general, in the city of Rome. The reported results about the networking and co-producing activities of Palazzo Merulana with a large number of local stakeholders and cultural partners are impressive.” (Casucio et al., 2019)

Like the case of the Jamtli Museum, the Palazzo Merulana is considered an innovative project. Here also, application of the impact assessment, adds to and continues the innovative aspects of the project. One year after the opening of the Palazzo Merulana a sustainability report was realized. The report is multi-dimensional, assessing the cultural,

social, organizational, and economic sustainability of the project. Similar to the case of Jamtli, the assessment has become an integral part of the project that enables self-reflection and conclusion for the management of Palazzo Merulana.

“The report testifies the important commitment to accountability and, at the same time, has the nature of a self- evaluation exercise aimed at understanding the points of strength and weakness emerged during the first year of life of the museum.”  
(response from the SoPHIA Stakeholder Survey)

### 3.6 Urbino as UNESCO World Heritage site

The historic city centre of Urbino was included in the UNESCO List of world heritage since 1998 for its outstanding universal value<sup>6</sup> while the UNESCO site management plan was drawn in 2013<sup>7</sup>.

The Municipality of Urbino carried out an ex-ante impact assessment with the aim of contributing to the definition of both the strategic projects relating to the cultural heritage assets and those included in the strategic plan of the City.

For the realization of these activities, a holistic analysis was carried out, conducted according to the criteria defined in the Historic Urban Landscape (HUL), and following the guidelines for the implementation of the Management Plans of UNESCO sites of the Italian Ministry of Heritage, Cultural Activities and Tourism<sup>8</sup>. This, according to the city managers, was done in order to implement a correct approach to urban space management, identified with the HUL guidelines, consistent with the principles of UNESCO<sup>9</sup>.

The HUL is an approach to the safeguard, protection, and valorization of cultural heritage that goes beyond the geographical and geomorphological scope, determining the increasing relationships between conservation and development. The role of HUL in local development processes has been recognized as «cultural urban heritage/landscape provides quality, sense and meaning to the urbanization processes, promoting the implementation of “places” as attractive (economic/social/cultural) spaces in the city/metropolitan areas, where many plus values are produced» (UN-Habitat 2014, p.49). This approach recognizes the landscape as a “living heritage”—an “organism” made of complex characters and multidimensional inter-relationships (Fusco et al. 2015; Angrisano et al. 2016).

<sup>6</sup> <http://whc.unesco.org/>

<sup>7</sup> [http://www.comune.urbino.pu.it/fileadmin/docs/settori/unesco/ufficio\\_unesco/attivita-ufficio-unesco-allegati/Piano\\_di\\_gestione\\_del\\_Sito\\_Unesco.pdf](http://www.comune.urbino.pu.it/fileadmin/docs/settori/unesco/ufficio_unesco/attivita-ufficio-unesco-allegati/Piano_di_gestione_del_Sito_Unesco.pdf)

<sup>8</sup> <https://www.unesco.beniculturali.it/il-piano-di-gestione/>

<sup>9</sup> <http://www.historicurbanlandscape.com/>

The strategic guidelines of the management plan of the UNESCO site of Urbino are divided into several areas of intervention that emphasize the holistic approach of the management plan:

- conservation and enhancement of the urban structure, green areas and landscape;
- enhancement of the Urbino cultural and tourist system;
- accessibility and mobility within the historic centre of the city;
- projects for the economic and social development of the Urbino community;
- diversification of the destinations of use characterizing the historic center;
- innovation and strengthening of the functions of the historic center through digital technologies - Urbino smart city -
- safety and emergency management of the historic settlement - disaster risk management plan and guide to disaster risk management.

"The HUL approach aims to promote and strengthen the management and conservation of cultural heritage, which is based on the shared values of the population that lives there, works and carries out permanent or temporary activities in that site, with respect to cultural, economic, social, etc. values of the cultural asset. The HUL approach used for the preparation of the Management Plan of the Historic Center of Urbino was therefore aimed at "taking advantage of" the historical heritage and local culture also to guide and direct, in a process of mutual enrichment, planning and design of the whole city development, with a view to sustainability ". (response from the SoPHIA Stakeholder Survey).

In compliance with the HUL principles, efforts were made to ensure that the drafting of the management plan emerged from activities conducted in a highly participatory way, with the aim of maximizing the involvement of citizens and stakeholders in the process.

"To implement this participatory process, a digital section was set up on the home page of the municipal administration and an initial consultation phase was planned for all those involved in the management of the World Heritage site." (response from the SoPHIA Stakeholder Survey)

The impact assessment of the projects according to the management plan is foreseen ex-ante and ex-post.

In the planning phase and on the basis of a series of indicators, an objective and updated picture of the historic centre of Urbino was built, highlighting problems and criticalities, but also explicit or implicit potential and strengths. These elements have become the projects on which to intervene in the implementation phase of the Management Plan.

Following the approval of the Plan, the Municipal Administration created the office specifically dedicated to the implementation of the plan and its monitoring, but the structure soon evolved, becoming an autonomous sector of the administration, which was mainly entrusted with the function related to the Urban Decor. Furthermore, it should be noted the difficulty in carrying out a periodic monitoring process of the impacts achieved, every 2-3 years, as initially planned. The establishment of the Commission for the evaluation and monitoring of the Plan, in fact, was not followed up, as it was considered a too complex and articulated mechanism in view of the limited spending budget of the municipality, and due to the fact that the monitoring process is voluntary and not required by law. However, currently, the municipality is working on the monitoring of the plan approved in 2013, which will be conducted not only using the indicators provided in the management plan but also through useful indicators for monitoring the achievement of the UNESCO 2030 SDGs. Finally, a survey will be conducted to assess the satisfaction of the expectations that the population had on specific projects. All these activities would lead to a participatory monitoring system, which is the basis for a participatory governance of a UNESCO site (Del Baldo & Demartini, 2021)

In the following, one example of a negative practice will be presented. Other practices that were considered poorly done by the SoPHIA stakeholders were HIA's cases or cases to which no name reference and information was given.

### 3.7 Mullagmore/Luggalla visitors centre

The Mullagmore/Luggalla visitors centre, and the controversies surrounding it, was listed as an example of poorly done impact assessments in cultural heritage by one of the SoPHIA stakeholders. The stakeholder was, at the time, working for the state institution responsible for the establishment of the visitor centre and was able to provide detailed information about the case.

In the beginning of the 1990s the European Commission was funding the establishment of an interpretative (visitors) centres in national parks in Burren, the Boyne Valley, the Dingle Peninsula and the Wicklow Mountains planned by the Office of Public Works (OPW). Especially the plans for the centres in Mullagmore and Luggalla sparked lots of critique after the OPW commissioned an environmental impact study (EIS). The study was strongly criticized by various parties. The critique referred to following points:

- The EIS for the visitors centre near Mullagmore was “fundamentally flawed” because it did not consider other sites, according to an independent report that was commissioned by the WWF-UK in 1992.
- Furthermore, the WWF criticized that the study was carried out very quickly and evidence of bias in the report was noted because of the reliance on the reputation of the OPW. (McDonald 1992).

- At the core of the public and political critique was that the OPW first chose the site, then commissioned the EIS and not a full-scale EIA. The OPW was exempt from planning control and therefore “acted as a judge and jury at the same time” (McDonald 1992a)
- In terms of stakeholder perspectives, it also must be noted, that the OPW started a public consultation process after legal proceedings were initiated by the Burren Action Group against the OPW plans. Yet, also this consultation was condemned as biased (McDonagh 1993).
- In this context, the SoPHIA stakeholder also pointed out that “clearly, there was a complete absence of anything resembling a holistic approach” (response from the SoPHIA Stakeholder Survey)

Finally, in 2000 the Irish Supreme Court refused planning permission for the visitors centre in Mullaghmore. It was the end of a nine-year long debate on the location of the facility and the management of the Burren National Park as well as the “most protracted heritage controversy” in Ireland (response from the SoPHIA Stakeholder Survey).

## 4. Conclusions

Apart from the specific practices highlighted by the stakeholders, common elements and findings from the questionnaires can be identified. These elements for identifying good and poorly done practices are described and summarized in the following.

### 4.1 Holistic and participatory objectives, holistic assessments

When comparing and reviewing the good practice examples above as well as other comments from the questionnaires, it becomes obvious that the practices understood as positive examples are often impact assessments related to projects, programmes, and interventions that had a holistic and participatory approach themselves.

For instance, in comparison to other ECoC's Liverpool 2008 was characterized by a very large budget. This enabled actions in many different spheres departing from a broad understanding of culture. In this context a holistic, longitudinal, and participatory assessment which was implemented in a collaborative way was also financed. Similarly, Palazzo Merulana had a very community-oriented understanding of the objectives of a museum, resulting in a sustainability study that looked at various aspects of impact and considered many to be relevant. Furthermore, the Palazzo Merulana study was also built on the holistic understanding of the Cultural Heritage Counts for Europe report (CHCfE Consortium 2015). Therefore, the role that a holistic, participatory, and longitudinal impact assessment can play for projects that do not have a broad approach to cultural heritage needs to be reflected.

“In my experience, the problem of the measurement of an impact is always linked to the fact that in origin the objectives are not clear, measurable, directly connected to a responsibility of someone, achievable, etc. And, moreover, by the fact that the objectives are set by public office without any consultation process.” (response from the SoPHIA Stakeholder Survey)

### 4.2 Transparency in terms of management commitment and adequate funding

A commitment to continuous assessment as part of the management of the intervention is recognizable in good practices' examples. Specifically, in the case of the Jamtli museum, the assessment and monitoring of the Jamtli village became part of the management structures of the museum. The museum thereby committed to the project and to the evaluation by financing the assessment and including it in its management system. Such an understanding stands opposite to many other impact assessment practices reported. Many stakeholders emphasize that impact assessments are often

commissioned too late and, thus, they have to be implemented in a short period of time and do not have the funding for a broad participatory course of action.

“Typically, assessments are narrow, partial and done at a late stage. In many countries, a large share of proposals is not formally assessed or is assessed with a ‘tick box mentality’.” (response from the SoPHIA Stakeholder Survey)

The question of resources in terms of time and funding depends on who is commissioning the assessment, at what point of the project and why. Such information provides detailed information in order to understand how an assessment can be implemented in a holistic manner, with a longitudinal approach, covering multi-stakeholder perspectives. This becomes even more relevant considering that culture and cultural heritage have, in addition to an intrinsic and institutional value, an instrumental value that serves an interest and a goal (Throsby, 2001). Therefore, transparency is necessary:

“The understanding – for whom, and for what are we doing this impact assessment – who stands behind – is relevant and needs clarification and more transparency.” (response from the SoPHIA Stakeholder Survey)

### 4.3 Relevance of national legislative obligations

Finally, some cases of interventions in cultural heritage described above (as well as other cases referred to in the questionnaires) have been obligated to implement holistic impact assessments due to national legislations. Such legislation mainly refers to obligatory Environmental Impact Assessment Review (EIAR) processes in infrastructure and building projects.

“When a plan is drawn up, the environmental impact of implementing the plan, including socio-economic, social, cultural, and other impacts, must be assessed to the necessary extent. Such an assessment must cover the entire area where the plan may be expected to have material impact.” (response from the SoPHIA Stakeholder Survey)

By these means, impacts of interventions in cultural heritage are assessed on the grounds of national legislative provision. These national laws have greater legislative power than guidelines provided by international organisations, specifically if the cases or not directly connected to international funding or status. If national legislative provision also takes a holistic approach they can represent a key guarantor for holistic assessments in cultural heritage.

The Mullaghmore/Luggala visitor centres are a historically interesting case in terms of changing legislative obligations. The responsible state agency



“[...] blundered into this project secure in the knowledge that as a state agency it was exempt from the obligation to seek planning permission. Some years later a Supreme Court judgement found this to no longer be tenable and the state has since been subject to the planning laws.” (response from the SoPHIA Stakeholder Survey)

The case also points at the question of political power and political context that will always influence interventions in cultural heritage and poses the question how the political context can be included as a variable in assessment.

From this perspective, it would also be interesting to analyse to which degree (national) legislative provisions on interventions in cultural heritage may also change the action of the responsible institutions ensuring and financing more credible impact assessment procedures.

#### 4.4 Implications for the SoPHIA model

According to these findings deriving from the consultation with Advisory Board members and stakeholders, the following questions need to be considered in developing a holistic impact assessment model. These will also be included in the work for creating and implementing policy recommendations, operational programmes, and a practical toolkit for the heritage professionals:

- how can an impact assessment model support transparency in terms of the objectives of an assessment (for whom and why?) and, at the same time, promote a holistic, inclusive, and continuous longitudinal assessments?
- how can an impact assessment model stay applicable in terms of holistic, inclusive, and longitudinal standards, despite having little budget and resources?
- how and when can international framework guidelines effectively support the application of a holistic impact assessment model?

## Literature

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- Angrisano, M., Biancamano, P.F.; Bosone, M.; Carone, P.; Daldanise, G.; De Rosa, F.; Franciosa, A.; Gravagnuolo, A.; Iodice, S.; Nocca, F.; et al. (2016). Towards operationalizing UNESCO Recommendations on “Historic Urban Landscape”: A position paper. *Aestimum* 2016, 165–210
- Caussucio, L., Causi, M., & Gennari, L. (2019). Giving a value to community mission and artistic brand: a new museum tale from the hill of Esquilino.
- CHCfE Consortium. (2015). Cultural heritage counts for Europe. CHCfE Consortium: Krakow, Poland.
- Colleran, E. (2000). Decision puts to rest the debate on siting visitor centres in national parks. *The Irish Times*, Nar 7, 2000, p.5
- Delbaldo, M. & Demartini, P. (2021). Cultural Heritage through the “youth eyes”: towards participatory governance and management of UNESCO sites, in Demartini, P., Marchegiani, L., Marchiori, L. & Schiuma G., *Cultural Initiatives for Sustainable Development. Management, Participation and Entrepreneurship in the Cultural and Creative Sector*. Springer.
- Echter, C.-P. (2015). The cultural heritage counts for Europe project and historic cities." *Sustainable Development, Culture, Traditions*, 1a, 49-65.
- Fusco Girard, F., Gravagnuolo, A., Nocca, F., Angrisano, M., & Martina Bosone, M. (2015). Towards an Economic Impact Assessment framework for Historic Urban Landscape conservation and regeneration projects. *BDC (Bollettino del Centro Calza Bini, Università degli Studi di Napoli Federico II)*, 15(2),265-293.
- Garcia, B., Melville, R., & Cox, T. (2010). Creating an impact: Liverpool’s experience as European Capital of Culture. University of Liverpool. Available: [https://www.liverpool.ac.uk/media/livacuk/impacts08/pdf/pdf/Creating\\_an\\_Impact\\_-\\_web.pdf](https://www.liverpool.ac.uk/media/livacuk/impacts08/pdf/pdf/Creating_an_Impact_-_web.pdf) [accessed 03/12/2020].
- Grenet, S. (2019). Heritage of display: interculturality and cultural diplomacy in the 2010 UNESCO falconry file. *International Journal of Heritage Studies*, 25(6), 553-564.
- ICOMOC (2011). *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*. International Council on Monuments and Sites: Paris, France.

- Labadi, S. (2007). Representations of the nation and cultural diversity in discourses on World Heritage. *Journal of social archaeology*, 7(2), 147-170.
- McDonagh, S. (1993). Mullaghmore consultation renews doubts on OPW role. *The Irish Times*, Aug 10, p.10
- McDonald, F. (1992) Plea to EC over Burren centre. *The Irish Times*, Mar 5, 1992, p.9
- McDonald, F. (1992a) 'Elitism' claimed I growing controversy over heritage. *The Irish Times*, Mar 9, 1992, p.12
- Patiwael, P. R., Groote, P., & Vanclay, F. (2019). Improving heritage impact assessment: an analytical critique of the ICOMOS guidelines. *International Journal of Heritage Studies*, 25(4), 333-347.
- Throsby, D. (2001). *Economics and Culture*. Cambridge University Press.
- UN-Habitat (2014). Report of the First Urban Thinkers Campus. Caserta, Italy, 15-18 October 2014.
- Yu, S. (2018). Searching for the in-between: Developing Indigenous holistic approaches to cultural heritage assessment and interpretation. *Coolabah*, (24&25), 168-182.
- Zipsane, H. (2016). Investing in a sustainable intercultural dialogue at Jamtli. *ENCATC MAG*, 104, 31-34.

## Annexes

### Questionnaire on best and bad practices of cultural heritage impact assessment

We would kindly like to ask you to participate in a short survey on existing impact assessments in cultural heritage.

During the first months of our project we collected a first list of relevant impact assessment models in the field. To complete the list and identify existing good and rather poor impact assessments, we would like to ask you for your support.

Please find below a few short questions on best and bad practices of impact assessment of concrete cultural heritage interventions.

Thank you for your support!

#### 1. Best Practices

<p>1.1 Are you aware of any case of impact assessment of intervention on cultural heritage that you consider exceptionally well done?</p> <ul style="list-style-type: none"> <li>• How do you know the case, and have you had any active role either in the intervention or in the impact assessment, or in both?</li> <li>• Would you suggest this case as a best practice and if so, which characteristics make this case a best practice?</li> </ul>
<p>1.2 Would you define the impact assessment <i>holistic</i>, as it included all the relevant domains (environmental, economic, social, and cultural)? If so, how is this reflected in the method that has been used in the impact assessment?</p>
<p>1.3 Would you agree that the impact assessment has duly included a multi-stakeholder perspective, taking into account the stakes of main stakeholders involved, such as: a) policy makers at different levels (regional, national, EU); b) local communities (to guarantee the construction of a shared heritage under an inclusive and participatory perspective); c) youth and future generations (to take into account our legacy and responsibility); d) civil society organisations and networks; e) others.</p>
<p>1.4 Would you state that the impact assessment had considered appropriate time horizons? How did it consider the planned impact, which should be measured <i>ex ante</i>, as well as unplanned impact, that can be reconstructed only <i>ex post</i>? How did it include in the evaluation positive as well as negative impacts?</p>

## 2. Bad Practices

<p>2.1 Are you aware of any case of impact assessment of intervention on cultural heritage that you consider poorly done?</p> <ul style="list-style-type: none"> <li>• How do you know the case, and have you had any active role either in the intervention or in the impact assessment, or in both?</li> <li>• Why do you believe that the impact of the intervention has not been correctly assessed?</li> <li>• How was the process of assessing the impact performed?</li> <li>• Would you state that the process had been flawed, and how? What would you have done differently?</li> </ul>
<p>2.2 Do you believe that the impact assessment has not been holistic, and why?</p>
<p>2.3 How has the impact assessment neglected the stake of any relevant stakeholder?</p>
<p>2.4 Has the impact assessment considered a limited time horizon?</p>

### List of (good and bad) practices mentioned by stakeholders

- Craft Initiative Georgia (Strategy21)
- Ex-post Evaluation of the Trout Museum in Gacka

- HIA on the wider area of Srđ in the context of the project “Baština – pokretač razvoja”
- HIA framework for the Old City of Dubrovnik World Heritage
- HIA of the Master Plan for the development of Functional Region South Dalmatia
- HIA Sports and Recreation Centre with a golf course and the Bosanka North and Bosanka South Tourist Resorts, Dubrovnik
- HIA Belvedere Redevelopment Project, Dubrovnik
- HIA Urban Development Plan for settlement for the veterans on Nuncijata, Dubrovnik
- HIA Urban Development Plan 2.2. "St. Jakov", Dubrovnik
- HIA a new railway transit system, Melaka
- HIA Golden Horn Metro Bridge Project, Istanbul
- HIA Orange Metro Line, Lahore
- HIA Waldschlößchen Bridge, Dresden
- Jamtli New Village
- Impact 08 – Liverpool
- Medvednica Nature Park
- Master plan (action plan) for the community Polemi, in Cyprus
- Mullaghmore/Luggala visitor centre
- Palazzo Merulana