PARTNERSHIP-LED REGENERATION OF HERITAGE PROTECTION ZONES

The impact of public-private partnerships with civil society involvement on the protection and development of heritage protection zones in the Netherlands and England

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ABSTRACT

Like all parts of our environment, designated historic areas, whether urban or rural, are under pressure to adapt to social, economic and climatic challenges. It is, therefore, important to actively manage their development alongside their legal protection. In recent years, an integrated approach to heritage in planning aimed at sustainable heritage development has gained increasing theoretical and practical support. As the concept of integration is based on the realisation of a shared vision, the incorporation of participatory practices is considered essential for the successful regeneration of historic areas.

However, to what extent this is the reality in practice with already designated heritage assets varies largely from case to case. The governance structure and participation procedures in existing heritage protection zones and their impact on their development remain a largely under-researched issue. In order to explore how the participation of the public sector, the private sector and civil society can enhance protection and development in heritage protection zones, two partnership programmes aimed at regenerating heritage zones were studied. Within the context of the Dutch protective instrument of "beschermde stads- en dorpsgezichten", the analysis of the municipal scheme Dorpsontwikkelingsmaatschappij shows how the Frisian village of Ee tackled the issues of physical deterioration of the historic built environment and economic decline through a collaboration between the province, the municipality and citizens. To explore governance in England's 'conservation areas', the case of the Heritage Action Zone programme, which has been applied in several conservation areas across the country, shows how collaboration between Historic England, local authorities, NGOs and citizens has helped to improve a physically and economically deprived historic area in the city of Sunderland.

The case studies show that cultural heritage status does not necessarily imply a restriction on development, but rather can be seen as an opportunity for further activities in the area. The Dutch and English examples demonstrate how top-down measures can initiate or enhance bottom-up initiatives in protected areas in different ways, thereby strengthening the protection of the area and encouraging its further development. Heritage protection zones and other protective instruments play a significant role in preserving our cultural heritage. However, merely regulating the development within these areas falls short of securing their long-term future. Therefore, governing bodies must take measures and encourage active cooperation and participation in historic urban areas to enable them to adapt to changing times.

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1. INTRODUCTION

In the midst of the rapid changes of today's world, protected historic areas are an integral part of the built environment, preserving the essence of the past. However, despite such areas being inclined to remain unaltered, modern challenges such as climate change, globalisation and urbanisation force them to adapt. However, adapting these areas is often challenging due to the constraints imposed by designating them as heritage sites. Zoning is a common tool used to regulate undesirable development in these areas as part of the designation process, which protects them from external influences. Therefore, heritage protection zones often experience a tension between protection and development (Turner et al., 2012) – between preserving the cultural-historical values and adapting to change and progress. The challenges in many protected areas are pressing and will only increase in the coming years because the cities and the protection zones have to face multiple challenges such as inner-city construction, increasing traffic pressure, urbanization, sustainability measures, energy transition, climate adaptation as well as the need for the democratic participation of residents (Blom and Timmer, 2019). Some places experience the opposite effects of development, including declining populations and vacancy of shopping streets (Blom and Timmer, 2022). In the face of all these pressing challenges, protected historic areas can no longer resist change and must instead embrace new ways to sustain them and find a balance between protection and development.

How to sustain such changes is an issue faced by policy-makers, heritage professionals, urban planners as well as residents in these protected areas. Finding a balance between protection and development can be a tricky endeavour. In recent years, however, heritage has been increasingly perceived as a driver for sustainable economic, social, cultural and spatial development instead of an obstacle (Gražulevičiūtė, 2006; Janssen et al., 2017; Turner et al., 2012; Van der Auwera and Schramme, 2014). Within this context, there has been growing support for an integrated approach to heritage in planning in academia as well as in practice as an answer to the complexity of heritage development (Blom & Timmer, 2019; Blom & Timmer, 2022; Pickard, 2002; Strecker, 2019; Veldpaus & Bokhove, 2019). For instance, heritage-led regeneration of urban areas has gained more attention in recent years (Dogruyol et al., 2018; Fouseki and Nicolau, 2018; Said et al., 2013). By integrating the fields of cultural heritage and spatial planning and combining the expertise of both professions, it is possible to overcome the limitations of traditional siloed systems which may be unable to address these complex issues on their own (Van Straalen, 2012). The integrative approaches in planning and policy-making are based on improving governance practices and they are considered to be an inherent aspect of new governance ideals (Holden, 2012). Therefore, concepts such as collaborative governance, public participation and publiv-private partnerships often accompany integral processes as a way of organizing multiple stakeholders and different levels of planning authorities along with their different views, opinions and strategies (Van Straalen, 2012). Thus, public participation is a crucial aspect not only of spatial planning in general, but also of heritage integration in planning. In the heritage sector, the 2005 Faro Convention had an important impact on how the role of local communities is perceived in heritage planning and management as it emphasized the intangible aspects of heritage and put the human connection to the environment centre stage. National governments across Europe are becoming more aware of the need for participatory policies. However, as the 2017 OECD report on land-use planning systems in the OECD countries states, public participation in planning processes is still one of the challenges related to land use in European countries (OECD, 2017).

In the Netherlands, the new Environmental Law (Omgevingswet), which is due to come into force at the beginning of 2024, considers public participation as a key factor for successful planning and decision-making processes. This legal document foresees the integration of all aspects of the living environment under one framework, including the heritage sector. Therefore, public participation should be also part of processes concerning the development of heritage in the living environment. As the Dutch instrument of heritage protection zones, the "Beschermde stads- en dorpsgezichten" (BSDGs), which can be translated as "Protected Town- and Villagescapes", is to be covered by the new Environmental Law, the status of participation practices and its impact on development and protection in the protected areas is unknown. Although the new Environmental law is not in force at the time of conducting this research, it poses implications for the future development regarding governance that the protected areas ought to deal with. The law, therefore, poses the urgency for looking into the state of participation in protected areas in the Netherlands. Furthermore, it shows the trend of including participation in primary legal documents. Generally, there is regular discussion about the functioning of the BSDG instrument and its relevance (Prins et al., 2014). Recently, the Heritage Inspectorate found that many municipalities no longer draw up policies for protected town and village sites (Blom and Timmer, 2019). As a result, the instrument does not reflect the current challenges facing these zones and it is not clear how new developments should be anticipated. Moreover, neither the current nor the forthcoming legal framework specifies participation procedures for protected areas. Thus, it is not clear how participation in development in protected historic areas should be implemented in individual cases in the Netherlands.

In England, participation has been part of the planning system for a long time, however, the government is aware of limitations to public engagement in planning and wants to encourage participatory practices in different stages of planning, specifically in the beginning (UK Parliament, 2021). The English heritage protection zones, known as "Conservation areas", experience similar tensions as their Dutch counterpart as they cover parts of villages as well as cities throughout the country. In both countries, partnerships in the cultural heritage sector have a longer tradition in the form of heritage societies and organisations, which buy and renovate historic buildings. However, the implementation of partnership schemes and public participation in the development of heritage protection zones is in its early stages, and to what extent non-governmental stakeholders are involved in the development of historic areas differs from case to case. As countries across Europe put more emphasis on participation in planning processes and heritage management, it is important to understand the complexities of engaging various stakeholders in the development of heritage protection zones and the impact this can have on overall regeneration of historic areas.

1.1   Review of literature on heritage protection zones and their governance

There are multiple angles on heritage protection zones in existing literature as they can be looked at by different disciplines. Zoning as an instrument has broad coverage in literature from an economic perspective (Fischel, 1987; Fischel, 2000; Thorson, 1997), in urban planning (Booth, 1989; Lai, 1997; Sclar et al., 2019; Wilson, 2008) and in nature conservation (Ebregt and Dreve, 2000; Jongman, 1995; Maksin et al., 2008; Rotich 2012). In the real estate field, cultural heritage, in the form of individual monuments or whole historic areas, is known to have spillover effects on the real estate market by increasing the economic value of properties in the

area (Andersson et al., 2019; Lazrak, 2014). There are also examples in the literature regarding how to determine a zone for heritage protection through mathematical modelling (Bykowa and Dyachkova, 2021) and how to approach the development of contemporary architecture in protected areas (Zagroba and Gawryluk, 2017). However, there is a lack of sources that consider heritage protection zones as the main topic, or provide a broader perspective on this specific instrument and individual examples focusing on Europe are scarce (Pickard, 2002). In addition, there is little comparison between are-based heritage protection instruments in terms of what they actually protect and how they enable or support development.

However, heritage is increasingly viewed as a catalyst for spatial development and a tool for planning visions by academics and practitioners, often in the form of adaptive reuse practices (Foster and Saleh, 2021; Janssen et al., 2017; Kee, 2019; Plevoets and Van Cleempoel, 2011; Rzasa, 2016; Yun and Chan, 2012) and revitalization of historic urban areas (Doratli, 2005; Gražulevičiūtė–Vileniškė and Urbonas, 2011; Heath and Tiesdell, 2013). Participation in such processes is also gaining more attention in research. However, there is more focus in literature on participation in tourism development (Dragouni, 2018; Chong and Balasingam, A. S., 2019; Eladway, 2020; Esichaikul, and Chansawang, 2022; Kunasekaran, 2022), often with a focus on world heritage (Li et al., 2020; Rasoolimanesh, 2017), rather than participation in the spatial development of designated heritage. This is noted by Foroughi et al. (2023) as well, who suggest that the heritage field could take inspiration from participatory processes in spatial planning as it is more established and widely used. For instance, Stiti and Rajeb (2022), look at participation from the angle of cultural heritage and see it as a "broad term that includes all participatory approaches with different levels of (non)inclusivity" (p. 322). According to these authors, participation in cultural heritage is in its infancy and further research on different methods of participation and collaboration in the field are needed. One of the collaborative forms can be the public-private partnerships (PPPs).

There are a few examples of in-depth research exploring PPPs in cultural heritage. Thompson's (2007) research in Italy showed that the potential of local communities and partnerships "in not only safeguarding our cultural heritage, but delivering it a genuine role in modern society is too often overlooked in favour of government- or market-led strategies" (p. 8). Other research by Jelinčić et al. (2017) set in the context of Croatia, Poland, Slovakia and Slovenia argues that national policies and public-private partnerships, in combination with institutional support, can lead to "significant savings and create 'value for money' in public sector investments" (p. 86). However, the introduction of public-private partnerships in heritage to achieve these benefits is not without its challenges. This is shown in Abdou's (2023) analysis of a case of heritage conservation in Croatia which identified five challenges to the implementation of public-private partnerships in heritage: "political commitment, a lack of understanding of the nature of PPPs among public bodies, the lack of a sound economic environment, the non-competitive characteristics of private operators, and misrepresentation of PPPs" (p. 1). How PPPs work in heritage in practice was also the focus of Colomer's (2021) research which compared a Finnish and a French case of implementing the 2005 Faro Convention which promoted participatory processes in heritage. Based on her research, Colomer shows that there is no universal way of implementing such a process and that there is a "disparity between the participatory instruments proposed and the way in which they are implemented" (p.13). These examples show the need to further study partnerships and participation practices in cultural heritage and its integration in planning in different socio-economic and political contexts.

1.2   Research question

Based on this literature review, it is clear that there is a knowledge gap regarding collaborative practices in the development and further protection of already designated heritage protection zones in the Netherlands and many other countries. Participatory processes within the Dutch heritage protection zones, the beschermde stads- en dorpsgezichten (BSDGs), have not been the subject of academic research so far. To fill in this knowledge gap, the Dutch case will be looked at in detail. To contextualize the Dutch case within the European planning and heritage culture, the English conservation areas will serve as a comparison. This will also provide more information on participation in the protection and development of historic areas in different political, socio-economic, historical and urban contexts. Thus, to find out more about the layers of participation and how heritage can be used as a tool for development in heritage protection zones while ensuring the preservation of cultural-historical values, this research asks the following main question and subquestions:

RQ: How can public-private partnerships with civil society involvement enhance protection as well as development of heritage protection zones, based on a comparison between the Netherlands and England?

SQ1: What are the characteristics of European heritage protection systems in connection to heritage protection zones?

SQ2: What is the relationship between protection and development in the heritage protection zones in the Netherlands and England?

SQ3: How is participation in planning and heritage foreseen in the European, Dutch and English context?

SQ4: What is the current state of participation practices in protection as well as development of heritage in the Dutch and English heritage protection zones?

1.3   Scientific relevance

This research presents a contribution to governance studies, specifically collaborative governance with a focus on public-private partnerships in the heritage sector. The results of this research provide more information on the role of civil society and private sector stakeholders in cultural heritage. Details related to the participation of non-governmental stakeholders in heritage planning is an understudied phenomenon. The governance of heritage protection zones and the issues in these areas are complex due to varying political, historical, socio-economic and spatial circumstances. Therefore, it is crucial to provide more examples of participatory practices in different contexts. Furthermore, this research contributes to the field of heritage studies as well as spatial planning as it observes the integration of both in two case studies. These can prove beneficial for learning more about the complexities of integrative approaches and about what role participation can play in such processes.

1.4　　Societal relevance

As many European countries are in the process of introducing better collaborative and participatory methods and policies for planning practice, enshrining them in law and putting them into practice, more information is needed for policy makers, heritage professionals, urban planners and other stakeholders to use such approaches properly. Although this research presents only two cases and therefore cannot serve as general guidelines for designing participatory programmes in heritage and spatial planning, they can serve as an inspiration or a stepping stone for other places which might share some similarities, either in terms of the challenges that they face, or the heritage assets in question. Furthermore, this research can address many doubts around participatory practices by showcasing their benefits in detail and explaining their importance.

1.5　　Reading Guide

To provide a theoretical background, Chapter 2 explores three areas of theory connected to the topic of this research. Chapter 3 clarifies the methodology including the data collection and analysis. Chapter 4 serves to gain a better understanding of heritage protection systems in Europe and the general characteristics of heritage protection zones. This chapter explores these instruments in an international context and serves as a contextualization for Chapter 5. Chapter 5 provides detailed information on the Dutch and the English protection instruments, in terms of the nature of protection as well as development. It further presents two comparative case studies of partnership programmes aiming for regeneration of heritage protection zones in the Netherlands and England. Chapter 6 evaluates and synthesizes the collected data and presents the findings along with their discussion. The last chapter is a conclusion to this research.

2. THEORETICAL FRAMEWORK

By examining the concepts underlying the main research question viz. public-private partnerships, community involvement, spatial development, and conservation zones, it becomes evident that this study falls at the intersection of three academic disciplines: heritage studies, governance studies, and urban planning. The topic of heritage protection belongs to the field of heritage studies, while heritage protection zones and their development can be perceived both through the lens of heritage studies and spatial planning. Public-private partnerships (PPPs) and public participation are topics of governance studies. In recent years, governance has entered the field of spatial planning as more attention is paid to the variety of governance practices, models, and networks in planning processes (Hartmann and Geertman, 2016). So, the topic of PPPs can also be found at the intersection of governance and spatial planning. This results in a complex array of theories which could be applied to individual topics, however, there is no theory which would succeed in connecting all three of them in one. In order to develop a theoretical framework for this research, it is crucial to first define the areas relevant to the focus of the thesis which is formulated through the main research question.

As Figure 1 shows, the areas of interest within the three fields intersecting in this research are area regeneration, cultural heritage and public-private partnership governance. The relations within these areas of interest are as follows. The research looks at the regeneration of historic areas that have been granted the status of a cultural heritage site (see connection I., Fig 1). Spatial development processes can be generally described through their governance systems. In this case, the focus lies on the PPPs (see connection II., Fig. 1). The governance of the development of cultural heritage, specifically the effect of public-private partnerships in the regeneration of heritage protection zones, is the connection that this research aims to analyse (see connection III., Fig. 1). Within these themes, relevant theories were identified and then linked together to create the theoretical framework.
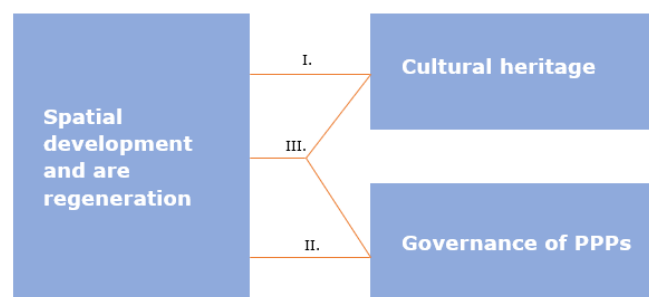
Fig. 1: Relations between theories

A theory that is related to the field of spatial planning is the social sustainability theory of historic environment regeneration developed by Izadi et al. (2020) who based it on Talcott Parson's theory of social systems (Parsons, 1964). There are multiple reasons for choosing the theory by Izadi et al. (2020) as the core theory for this research. First, the theory describes the regeneration of the historic environment which is the subject of this thesis as it focuses on the protection and development of the historic environment. The theory does so through the lens of social sustainability, which correlates with the societal approach of this research. Secondly, the theory is based on the premise of social sustainability being 'a socio-historical process' (Izadi et al., 2020, p. 163). This presents a link to the theory on cultural heritage by the prominent

heritage scholar Laurajane Smith who argues that heritage is a 'cultural process' (Smith, 2006, p. 44). Smith (2006) discusses the abstract concept of heritage in its general terms whereas Izadi et al. (2020) talk about the physical expression of heritage in the form historic built environment. However, both authors point to the processual nature of the cultural heritage and that links them together. Thirdly, these two theories are further connected through concepts such as a sense of belonging and identity that both of the theories describe. These concepts and the linkages between them are described in greater detail in the following sections of this chapter. Finally, the theory of Izadi et al. (2020) also shows multiple links to theories within governance studies in terms of participation, cooperation and trust. The connection between these theories is also explored in detail in this chapter. These connections can be observed in Figure 2.

Figure 2 also shows that this theoretical framework needs to be seen and understood in the context of listed (designated) heritage assets (buildings, ensembles, areas). Listing is a process carried out by national and local authorities whereby individual buildings, ensembles and whole areas are added to a national or local heritage list. Listing serves to protect cultural heritage and imposes several restrictions on the development of the assets and their use. This is related to the theory that cultural heritage is a public good and should, therefore, be regulated and funded by the public sector. This is a very important concept that needs to be understood first and foremost because this research focuses specifically on nationally listed historic areas and the development within them. For this reason, the theory of heritage as a public good and the practice of listing as well as the nature of these implications are explained first. After that, the other theories and their connection to each other are explained.
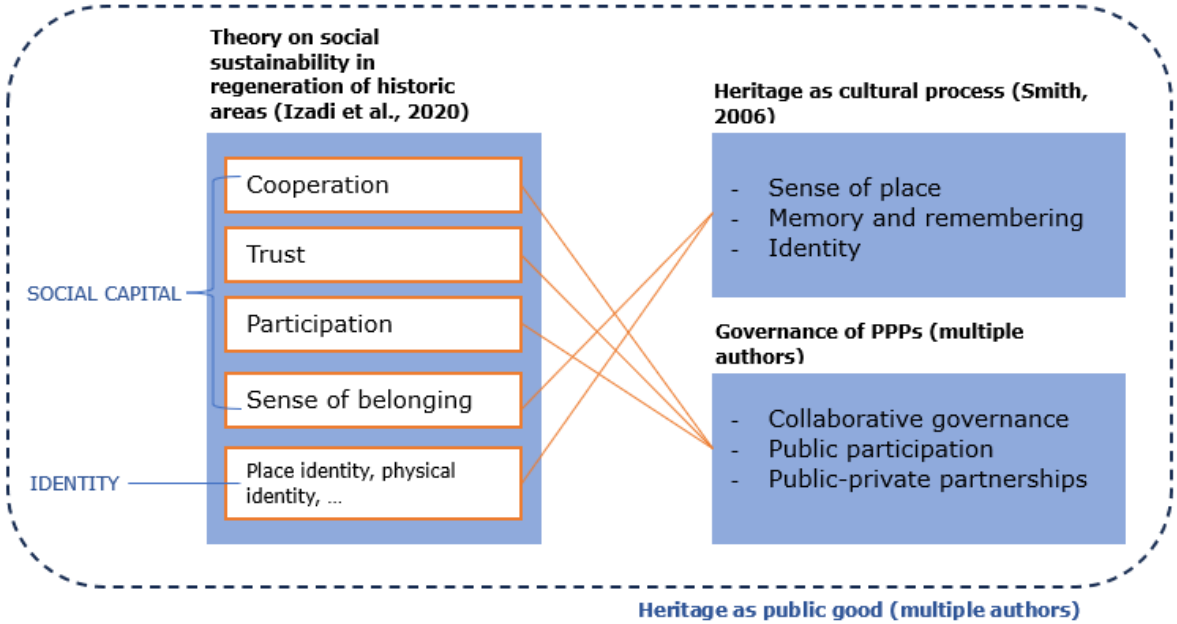
Fig. 2: Theoretical framework

The aim is to use this theoretical framework as a basis for interpreting the results of the case studies in this thesis and to see if they also apply in different contexts, i.e. in the English and Dutch contexts. The analysis will focus on the structure of the public-private partnerships and the role of social capital, identity, and their respective subsystems in the regeneration of heritage protection zones.

2.1 Heritage as a public good

Tangible heritage, meaning the historic built environment and its individual components, can be perceived as public good because heritage fulfils the two main characteristics of public good. Firstly, the consumption of built heritage (privately or publicly owned) is identical for all and also available to all, and secondly, the benefits of heritage are not limited only to those who are directly responsible for its protection, development and management (Benhamou, 2020). One such example is the "spillover effect", a positive external effect where proximity to historic monuments is beneficial to the local economy and tourism (Benhamou, 2020). However, these public good characteristics can lead to market failure which is described by economists as "inefficient allocation of resources with markets" (Ledyard, 1989, p. 189). As noted in a report from a conference organised by the Getty Conservation Institute back in 1998, "markets 'fail' when dealing with heritage conservation—that is, markets alone fail to provide for investment in heritage—and this phenomenon is due to the public good character of cultural heritage objects" (Mason, 1999, p. 6). That is why other measures, traditionally in the form of public funding provided by governments, are needed to correct this market failure so that heritage remains available to the public (Benhamou, 2020; Mason 1998). Regulation of public goods is, therefore, necessary to ensure their equitable distribution and future use. In the field of cultural heritage, the traditional regulatory instrument is the listing of monuments and historic areas.

2.1.1 Heritage listing

Listing is a legal instrument which has been traditionally used by municipalities and national governments, but also international organizations such as UNESCO (the United Nations Educational, Scientific and Cultural Organization). Listing is intended for the protection of valuable heritage assets to be passed on to future generations. The rationale for regulating cultural heritage from an economic point of view is for the protection of its long-term value (Benhamou, 2020). The assumption is that without regulations in place, heritage would experience considerable transformations which would lead to a decrease in its value (Benhamou, 2020). Thus, listing protects the public value of heritage (Rypkema, 2012). When a building, a set of buildings or an area is designated, it falls under the heritage protection law of the country and a set of protective principles is introduced (Rypkema, 2012). As Rypkema (2012) explains, "these protections can include restrictions on what can or cannot be changed and are often accompanied by a set of design and conservation guidelines specifying how alterations and maintenance are to be undertaken" (p.108).

Listing has an impact on how the built heritage is dealt with in terms of its development. There are several constraints that the listing implies which include the alteration, demolition and need of experts for supervision (Benhamou, 2020). In addition, as Benhamou (2020) argues, the listing has two distinct effects on heritage value. On one hand, the value of a heritage asset increases because of 'symbolic significance'. On the other hand, however, the opportunity cost reduces the value of the property. This is due to the fact that the conservation and maintenance costs pose an increased financial burden because historic buildings often require skilled labour and specific materials (Benhamou, 2020). As Rojas (2012) points out, developers and property owners are often the voice of opposition to listing due to the restrictions that listing poses for property development. However, Rypkema (2012) argues that a decrease in value is not necessarily true, since location from the point of view of real estate is the most important factor

for a building because the majority of the economic value of a parcel derives from its spatial context. The economic purpose of land-use laws and heritage designation is to protect this context (Rypkema, 2012). This is why, as Rypkema (2012) suggests, the value increases because the residents in such spatial contexts have the assurance that their neighbours will not be allowed to go through with inappropriate transformations. Therefore, the value of one's own property is also protected.

Thus, designating objects and areas as heritage can have an impact on their economic value after the listing process. However, the listing itself is also based on values that enter into the decision-making process as to why a particular building or historic area should be listed at all. These values are also subsequently incorporated into the financing and development of heritage assets (Rojas, 2012). The following section elaborates on such a process of heritage valuation.

2.1.2 Heritage valuation

Rojas (2012) sees tangible heritage property both as "fixed capital that could be income-producing, generating a flow of economic benefits, and as cultural capital generating a flow of noneconomic benefits for society" which are the satisfaction of people's needs in terms of social, spiritual, historic, aesthetic and symbolic values (p. 145). Defining and quantifying these values, however, is difficult, and this makes the argument for heritage protection and conservation based on social benefits rather complicated. Additionally, Rojas also emphasizes the use and non-use value of heritage, where the former describes the utility of heritage for specific groups (e.g., collection of higher rents from heritage properties or profiting from proximity to a historic building or an area), and the latter concerns, for example, the inheritance value or an 'existence value' when people appreciate the asset simply for the fact that it is there (p. 146).

According to Rojas (2012), different types of valuation of historic areas occur in several 'spheres of social interaction'. The first sphere, the scientific valuation, comes out of research in history, archaeology, anthropology and other academic fields. The second sphere is the sphere of cultural groups whose activities, such as securing partners for heritage maintenance or applying for incentives from the government, contribute to heritage valuation. Grassroots activities, such as community participation in conservation or NGO and civil society participation in decision-making, are the third sphere of social interaction proposed by the author. The fourth type is market transactions which concerns property purchases with the goal of preservation and development, sales and purchases of preserved, developed spaces and rental of such properties and other activities where for-profit private actors get involved. The last sphere is the institutional sphere. The institutional activities include, for example, setting up a national heritage institution, creating policies on protection, allocating resources for heritage protection, listing heritage assets, enacting a land-use law, offering fiscal incentives, determining the scale of interventions and coming up with a system of penalties applying to stakeholders (Rojas, 2012, p.150). The listing process has traditionally involved mostly experts such as academics and scientists or members of cultural groups who all come from 'the same socio-cultural strata' (Rojas, 2012, p. 149). Views and opinions of the non-expert public have had far less impact on listing processes. In heritage studies, this has been a long-standing notion, recognising the institutionalised dominance of expert opinion in valuation, the definition of 'official' heritage in policy-making and the exclusion of multiple views of and meanings for different civic groups (see 'Authorized Heritage Discourse' in Smith, 2006).

The economic value of heritage is no less important than its socio-cultural values. In connection with historic urban areas and their sustainable development, Rojas (2012) argues that "the sustainability of the conservation process is enhanced when a given urban heritage area is attractive to an array of users interested in a range of values associated with the heritage", and that "conservation efforts must strive to promote the economic value of the heritage as a complement and support for the conservation of the socio-cultural values that motivated action" (pp. 178-179). Rojas continues to say that "a flexible approach to preservation management and conservation is needed, to allow public and private partners to adapt heritage assets for new uses that are in line with social or market demand" (pp.178-179). Thus, to achieve the sustainable development of heritage, economic opportunities must be taken into account, and as the author suggests, public-private partnerships can have a crucial role in heritage protection and development. In the face of a constant need for adaptation in cities, public-private partnerships can ensure the sustainable development of heritage while protecting its socio-cultural values and integrating them into development.

2.2 Theory on social sustainability in the regeneration of historic areas

Sustainability plays an important role in spatial development and this applies also to the development of historic areas. The underlying theory of this research focuses on the social sustainability of historic area regeneration, developed by Izadi et al. (2020) who based it on Parson's theory of social systems (Parsons, 1964). Before exploring this theory in its entirety, it is important to first provide more background on the concept of regeneration of the historic environment.

2.2.1 Regeneration of historic environment

As already explained, officially recognised heritage arises through the listing process, which has implications for the heritage value and development of heritage assets. The concept of cultural heritage has mostly been associated with restrictions on spatial development, but in recent decades listed heritage has come to the fore as a source of income and a tool for development (Janssen et al., 2017), as it can guide urban and rural regeneration (Rypkema, 2012). The practice of using cultural heritage as a driving force in the regeneration process has even been termed as 'heritage-led regeneration' which "connotes initiatives where the driver for the social, economic and cultural revival of a declined urban or rural area is the heritage that makes a local place distinct" (Fouseki and Nicolau, 2018). Regeneration as a concept has been considered mostly in the context of cities and so the term 'urban regeneration' has gained prominence in literature (Granger, 2010; Healey, 1991; Roberts and Sykes, 1999). However, as Lončar and Vellinga (2020) argue, the challenges of rural regeneration "are not unlike those faced by urban areas" and regeneration projects in rural areas tend to follow the same principles as "their urban counterparts" (p. 147). That is why, in this research, the term 'regeneration' is not limited to urban or rural contexts, but refers to the historic environment in general and therefore also heritage protection zones in both urban and rural contexts.

Regeneration refers to a "comprehensive and integrated vision and action […] which seeks to bring about a lasting improvement in the economic, physical, social and environmental

condition of an area that has been subject to change" (Roberts and Sykes, 1999, p. 17). Regeneration has been traditionally associated with economic and social benefits (Orbaşlı and Vellinga, 2020). Economic benefits can include the provision of new jobs, new opportunities for local businesses and a boost to commercial trade in the area (Maeer et al., 2016). Social benefits include improving the quality of life, having a positive effect on life satisfaction, and supporting social cohesion in communities by enhancing interaction between people and therefore deepening a sense of collective identity (Maeer et al., 2016).

The concept of regeneration is closely linked to the concept of sustainability (Glasson and Wood, 2009). There are three sustainability domains in regeneration: economic sustainability, environmental sustainability and social sustainability (Xuili and Maliene, 2021). Izadi et al. (2020) perceive the regeneration of the historic environment through the lens of social sustainability. They base their theory on the theory of social systems by Talcott Parsons and his AGIL schema (Parsons et al., 1953).

2.2.2 Theory of systems by T. Parsons and the AGIL schema

In the late 1930s, the American sociologist Talcott Parsons proposed the social systems theory to explain the structure of any system in society. A social system, according to Parsons' theory, consists of "a plurality of individual actors interacting with each other in a situation, which has at least a physical or environmental aspect, actors who are motivated in terms of a tendency to the 'optimization of gratification' and whose relation to their situations, including each other, is defined and mediated in terms of culturally structured and shared symbols" (Groen, 2005, p. 74). A social system is not to be confused with a system of action, which is a broader concept to which a social system belongs. Within this theory, Parsons introduces an AGIL schema (see Fig. 3), arguing that it could be used to analyse both "abstract systems of action and actually existing, concrete societies" (Murphy, 2005, p. 6). There are four basic functions which ensure the performance of any (social) system: adaptation (A), goal attainment (G), integration (I) and latent pattern maintenance (L) (see Table 1). Parsons further argues that any system can be broken down into subsystems where each corresponds to one of the four functions (Murphy, 2005). The abstract nature of this scheme allows its application to different systems of any form and scale, such as groups, communities, institutions, social movements and others. Izadi et al. (2020) used this theory in their research to develop a systematic model of the social dimension of the historical environment, which is described in more detail in the following section.

THE AGIL MODEL OF SOCIAL ORGANISATION

| ADAPTATION (A) | GOAL ATTAINMENT (G) |
| INTEGRITY (I) | LATENT PATTERN MAINTENANCE (L) |

Fig. 3: The AGIL model of social organisations, adapted (Izadi et al., 2020, p.169)

Table 1

Four functional requisites of any system of action - AGIL schema by Talcott Parsons, adapted (Murphy, 2005, p. 7)	
(A)	Adaptation is an instrumental function by which a system adapts to its external environment or adapts the external environment to the system
(G)	Goal attainment is a consummatory function that defines the goals and ends of a system and mobilizes resources to attain them. Goal attainment is generally oriented externally
(I)	Integration is a consummatory function that manages the interrelationships of the parts of a system. The integration function maintains internal coherence and solidarity within the system
(L)	Latent pattern maintenance is an instrumental function that supplies all actors in the system with a source of motivation. It provides normative patterns and manages the tensions of actors internal to the system

2.2.3 System of social sustainability in the historic environment

As previously stated, urban and rural regeneration take into consideration social, economic and environmental aspects of sustainability. The theory by Izadi et al. (2020) takes the lens of social sustainability to describe components of the regeneration of historic environments. Izadi et al. (2020) perceive social sustainability as "a socio-historical process rather than an end state" (p. 163). Based on the AGIL model by Parsons, Izadi et al. (2020) developed a model where each of the components (adaptation, goal attainment, integrity, latent pattern maintenance) was applied in the context of social sustainability as follows: the 'social capital' fulfils the function of adaptation (A) which takes resources from the system and converts them into products; 'equity' functions as a subsystem for mobilizing resources to achieve stated goals (G) of social sustainability; 'social cohesion' creates unity of a system and so functions as the integration (I) component; and 'identity' is defined as the source of motivation of actors in the system and therefore labelled as latent pattern maintenance (L). Figure 4 shows these components in a simple model based on the AGIL schema.

SOCIAL SUSTAINABILITY OF HISTORIC ENVIRONMENT

SOCIAL CAPITAL (A)	EQUITY (G)
SOCIAL COHESION (I)	IDENTITY (L)
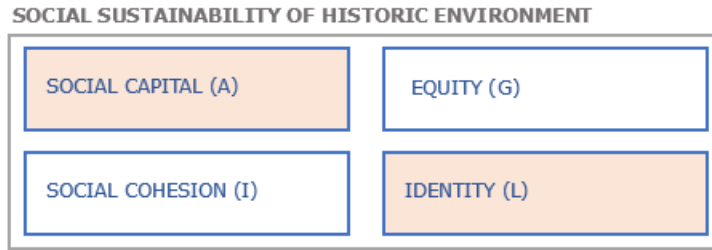
Fig. 4: Social sustainability of the historic environment, adapted (Izadi et al., 2020, p. 169)

Based on this theory, a system of regeneration of a historic environment can be socially sustainable and balanced only if it includes the four subsystems of social capital, equity, social cohesion and identity, where each of them fulfils a specific function of adaptation, goal attainment, integrity and latent pattern maintenance, respectively. The authors also introduce a second level of analysis and describe a second level of subsystems. On the second analysis level, two components, social capital and identity (see Fig. 5), are relevant because there are links to the theories on cultural heritage and governance of public-private partnerships. The following sections elaborate on the character of these connections.

SOCIAL CAPITAL (A)

Cooperation (A)

Trust (G)

Participation (I)

Sense of belonging (L)

IDENTITY (L)

Spatial/physical i. (A)

Place i. (G)

Functional-actual i. (I)

Cognitive-semantic i. (L)
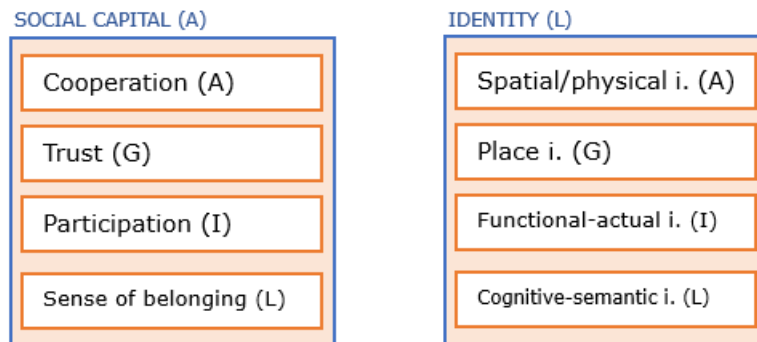
Fig. 5: Subsystems of social capital and identity, adapted (Izadi et al., 2020, p. 175)

2.3 Heritage as a cultural process

The previous section presented that social capital fulfils the adaptive function of social sustainability in regeneration. One of the structural components of social capital is a sense of belonging. For Izadi et al. (2020), a sense of belonging drives the residents of historic areas to "maintain intangible heritage such as customs and traditions as well as authenticity and environmental values" of their environment (p. 170). Another subsystem defined by Izadi et al. (2020) is 'identity', which is considered to be a source of motivation for citizens to protect their historic environment. The concept of identity has four components in the theory of social sustainability in regeneration: spatial-physical identity (A), place identity (G), functional-active identity (I) and cognitive-semantic identity (L) (Izadi et a., 2020). The concept of a sense of belonging as well as the various levels of identity can also be found in the theory of heritage scholar Laurajane Smith (2006) who describes heritage as a 'cultural process' (see Fig. 6).
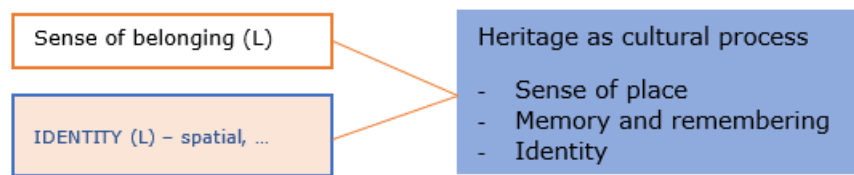
Fig. 6: Link between the theory on social sustainability of regeneration of historic environment and the theory on heritage as cultural process

Smith (2006) argues that heritage is not something static or purely tangible, but rather a cultural process. Smith's approach applies broadly to a general understanding of the concept of heritage and is not limited to architecture, urban areas or traditions and customs. She stresses that heritage "is not a 'thing', it is not a 'site', building or other material object" (p. 44). She does not dismiss the importance of physical objects, but perceives them as "cultural tools that can facilitate, but are not necessarily vital for" the process of heritage (p. 44). She explores the notion of heritage through seven concepts: heritage as experience, heritage as identity, the intangibility of heritage, memory and remembering, heritage as performance, the sense of place, and dissonance of heritage. Through these lenses, she shows how heritage is not something frozen in time, perceived only through its physical form, but rather a continuous and fluid creation of cultural meanings and a social and cultural process. Three of the seven concepts are of importance here which are the sense of place, heritage as identity, and memory and remembering. It's these three concepts that are the connecting links to Izadi et al.'s theory.

2.3.1 The sense of place

In Smith's view, a sense of place is closely related to a sense of belonging (the source of motivation in the theory of social sustainability in regeneration). Smith (2006) argues that a sense of place is about the creation of identity, a sense of belonging, and the "act of being at a heritage place" and experiencing it in real time (p. 77). For Smith, a 'place' is more than an area on a map defined by drawn boundaries. It is also more than its physical components such as buildings or streets. Traditionally, physical features and material authenticity have been the defining aspects of a heritage object or a site. In one of the first major international documents dealing with heritage conservation known as the Charter of Venice from 1964, tangibility plays a major role in heritage definition (Glendinning, 2013). The emphasis on material authenticity was at the forefront of the institutionalization of cultural heritage. This has had an impact on how people perceive heritage and what they identify as heritage in listing processes (Glendinning, 2013; Smith, 2006). The term 'site' has been traditionally used and applied in the field of archaeology and architecture for a heritage object. However, according to Smith (2006), 'site' is too restrictive a term for the broad and complex meaning of 'place'. In Smith's view, 'place' is more abstract and fluid. It is not constrained by fixed physical boundaries and it has a direct link to the construction of identity of the area. The concept of 'place' fosters a sense of belonging and offers more space for the inclusion of social and cultural aspects (Smith, 2006).

Since Smith (2006) characterises place as having fluid boundaries, its scale can vary from small areas to whole landscapes. In recent years, there has been more focus on whole landscapes as places of heritage which also induce a sense of belonging (Kolen and Renes, 2015; Strecker, 2019; Veldpaus and Bokhove, 2019). Garden (2006) introduced the notion of 'heritagescapes' that transcend the physicality of heritage sites and approaches them as a cultural phenomenon.

Garden describes heritagescapes as being both a place, defined by its physical attributes, and space in the sense of social complexities that construct the heritagescape through interactions and perceptions of the individuals inhabiting and experiencing the space over time. Garden (2006) argues that a heritagescape is more than "the sum of its physical components" as it is also about the "ephemeral aspects" which are "grounded in the physical components" (p. 398). For Garden (2006), "the landscape is never inert, people engage with it, rework it, appropriate and contest it" (p.407).

Relatedly, Smith (2006) also emphasizes the factor of constant change that characterise heritagescapes. She stresses that landscapes are "inevitably physically shaped or altered by human cultural practices" and also that the way they are managed and used is dictated by how these landscapes are defined (Smith, 2006, p. 78). In other words, a landscape is treated differently under different labels. Smith refers to the most common issue in dealing with landscapes and that is the 'issue of the nature/culture divide' (p. 78). This dualistic divide has been a long-standing issue in landscape research as initially the idea of 'pristine nature' prevailed as the epitome of landscapes (Kolen and Renes, 2015). In this conception, the human factor was omitted from an understanding of landscapes for a long time, as were the layers of history, stories and associated values and experiences (Renes, 2015). In recent years, biographical approaches to places have received more attention as they promote two-way interaction between landscapes and people and emphasize how they are intertwined. For example, the approach of landscape biography "starts from the assumption that landscapes are essentially human life world, and that people and their life worlds produce and transform each other in an ongoing dialectical movement" (Kolen and Renes, 2015, p. 25). This paradigm shift was also reflected in the European Landscape Convention, adopted by the Council of Europe in 2000. This convention strove to go beyond the sole appearance and physicality of a place and emphasized the relationship between the place and the people (Strecker, 2019). In this sense, this human factor is related to Smith's concern in connection with landscapes which is the 'issue of multivocality. Smith stresses the plurality of meanings that are embodied in a landscape and argues for accepting this in the definition of heritage. The multi-vocality implies the need for negotiation as these different meanings and values can be contested.

In this conception, a sense of place is, therefore, a complex and multi-layered notion that embodies the past as well as the present experiences that shape the places in return. According to Smith, these experiences are, however, "inevitably constrained by the boundaries defined […] by management practices and classification, listing or scheduling systems" which require well-defined boundaries (p. 79), such as the ones in heritage protection zones. Thus, the fluidity of meanings and values in protected areas can be limited by the listing process and its associated rules and constraints.

2.3.2 Heritage as identity and memories

Identity, like social capital, can have many facets that can be divided into second-level subcategories. Izadi et al. (2020) perceive identity in relation to collective memory and shared values (L), the physical environment (A), activities and life in the area (I) and a sense of attachment to a place (G). Smith (2006) perceives identity more holistically as she does not divide it into subsystems or categories, but connects to the concept of heritage in general. Despite this, there are multiple links between these two theories.

Firstly, the concept of collective memory and shared values (L) and the sense of attachment to a place (G) can be found in Smith's theory. Smith (2006) argues that "material heritage objects are symbolic not only of identities, but also of certain values" (p. 53). These values can either be in line with or contradict the dominant discourse that Smith attributes to official institutions and the dominance of experts in heritage listing and management. Smith points to the notion of 'national identity', which has traditionally been represented through official institutionalised practices in the field of cultural heritage, along with an emphasis on the importance of material, that is, tangible values over intangible values. However, as Smith explains, recently there has been more attention given to "subnational, and particularly 'local', construction of identity" (pp. 49-50). Smith also discusses memories and the act of remembering in the context of heritage. She specifically mentions the concept of 'collective memory', as does Izadi et al. (2020, p. 173). Smith argues that "memory is an important constitutive element of identity formation, unlike professional historical narratives, it is personal and thus collective memory has a particular emotive power" (p. 60). She further links collective memory with a sense of continuity and belonging: "a sense of collective memory may provide individuals and the collective with feelings of continuity and thus belonging and emotional security" (p. 63). Although Smith points out that this is different from historical continuity because memories can fade over time, sharing memories still provides "a sense of connection and communion" (p. 64).

Secondly, Smith also argues for a strong link between identity and the physical environment (A). According to Smith, identity is physically represented in the environment through material culture. In other words, the historic built environment is an expression of identity in an area. Physical attributes in the environment make it possible for people to build an attachment to it. The materiality of buildings thus gives the abstract and intangible concept of identity a concrete form. Lastly, Smith also refers to life in an area (I) in her concept of heritage as experience. Smith stresses that not only the physical characteristics of a heritage site are important but also its use. In other words, she attributes equal value to both physical attributes and the everyday life of the local community living in or nearby a heritage object or area.

2.4 PPP governance

Smith's theory on heritage as a cultural process presented connecting links to identity and one of the components of social capital, namely a sense of belonging. The other three components (subsystems) of social capital - cooperation, trust and participation – are typically addressed in studies of governance (see Fig. 7). According to Izadi et al. (2020), cooperation (A) is necessary for regeneration to convert sources into a final product. Trust (G) is an essential part of the interaction between individuals and authorities in the historical environment, and participation (I) is a tool to create coordination and cooperation between citizens. Izadi et al. (2020) even suggest that "participation draws the components of the system [of social capital] together" (p. 170). While Izadi et al.'s theory does not specifically address public-private partnerships, it does include concepts that are closely related.

Firstly, cooperation is an integral aspect of PPPs since the partnerships are based on partners cooperating and collaborating (Hodge and Greve, 2007). Secondly, in terms of participation, the PPP arrangement can increase the problem-solving capacity and legitimacy of governance through democratic participation (Börzel and Risse, 2005). Of particular interest in this study is public participation since the focus also lies on how the PPPs engage local communities in

heritage protection zones. And lastly, the effectiveness of PPPs can be positively influenced by mutual trust between partners (Padma et al., 2017). The theories in this section, therefore, deal first with the broader concepts of collaborative governance and public participation before looking in detail at PPPs.
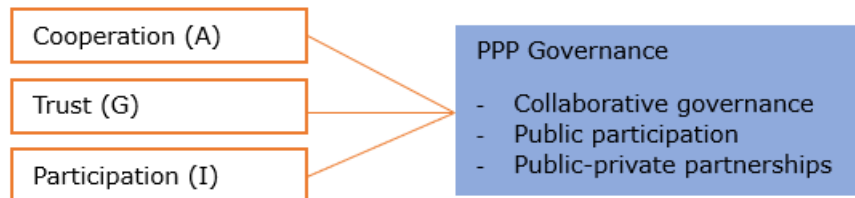
Fig. 7: Link between the theory on social sustainability of regeneration of historic environment and the theory on governance of PPPs

2.4.1 Collaborative governance

Collaborative governance has gained popularity among scholars and practitioners in the past two decades, but its specific characteristics along with a proper definition widely differ (Gash, 2016). As Gash illustrates, collaborative governance is becoming "a superior method of policy redress" (2016, p.455). According to Johnston et al. (2010), collaborative governance includes any "method of collective decision-making where public agencies and non-state stakeholders engage each other in a consensus-oriented deliberative process" (p. 699). Gash (2016), on the other hand, describes it as a "model of interest aggregation" (p. 455). However, she points out that despite the variety in definitions of collaborative governance among scholars, they all understand collaboration as being an entire process, from the point of setting a goal to the evaluation of an outcome. Emerson et al. (2012) see collaborative governance as "the processes and structures of public policy decision making", which engage several stakeholders across the public and private sectors "in order to carry out a public purpose that could otherwise not be accomplished" (p. 2). Emerson et al. emphasize that their definition does not limit collaborative governance to be only between governmental and non-governmental stakeholders. These authors see collaboration as being inclusive of multiple partners across all possible sectors, from governmental bodies and the private sector to civil society. These can create different sets of combinations such as public-private partnerships (PPPs).

The group that constitutes the decision-making body within the cooperation can be described in different ways. Innes and Booher (2000) and Quick and Bryson (2016) use the term 'network' to describe a collaborative group of stakeholders. Gash (2016) describes the group of organisations, partners and other stakeholders as a 'collaborative'. Gash (2016) also defines four main components that describe collaborative governance: 1) A collaborative is established through a network of partners that is able to draw on multiple perspectives in analysing and solving problems based on their "institutional, geographic, cultural, political or substantive pluralism"; 2) The collaborative unit must be able to govern in the sense of having the authority as well as autonomy in decision-making processes; 3) Key components of collaborative governance are the joint decision-making and 'problem-driven approach' which enable the

stakeholders to come up with new and innovative solutions; 4) Collaborative governance puts large emphasis on learning and evaluation or reflection in the process (p. 457). This implies that the sole sharing of information is not sufficient as the stakeholders ought to work together in all the stages of a collaborative process to support mutual understanding and to increase the chances of reaching a consensus.

Collaborative governance processes can be characterized by certain challenges. Gash (2016) presents four main challenges which collaborative approaches face. Firstly, the pluralism and multiplicity of views can increase tension during the collaborative process. Such diversity among stakeholders also implies power asymmetries. The goal of consensus and plurality of views can lead to excluding groups with a less popular view on the issue at hand or it can result in these groups leaving the collaborative as they need to "sacrifice their vision for the greater good of the collaborative" (Gash, 2016, p. 461). Secondly, limited access to resources can automatically exclude some stakeholders. Certain groups may lack access to information about open collaboratives due to their exclusion from traditional processes. Thirdly, the effectiveness of a collaborative arrangement is based on voluntary participation. And lastly, there is the danger of disillusionment of participants due to their high expectations prior the participation. This can lead to frustration among the participants.

It is important to mention that each collaboration is defined by the political, legal, socio-economic and environmental context in which it takes place and these components can influence the collaboration at any point of the process (Emerson et al., 2012). The impact of collaborative governance can be "physical, environmental, social, economic, and/or political" and have a short-term or long-term effect (Emerson et al., 2012, p. 18). Emerson et al. (2012) also elaborate on the drivers of collaboration. These are leadership, consequential incentives (such as resource needs or institutional crises), interdependence, which arises when problems cannot be solved by institutions or organisations alone, and uncertainty, which leads groups to work together, thereby reducing and sharing risks.

2.4.2 Public participation

Collaboration and (public) participation are intertwined concepts. According to Ghose (2005), the model of collaborative governance fosters public participation as a democratic practice. As Innes and Booher (2004) propose, the concept of participation is collaborative. They also argue that for a participatory method to be effective, it needs to include "collaboration, dialogue and interaction" (p. 422).

Quick and Bryson (2016) describe participation in general terms as "the process of engagement in governance" (p. 158). Participation in the broad sense can therefore take many forms: it can take the form of a survey, a one-off information meeting, or it can go beyond such forms and involve stakeholders in the decision-making process. Public participation occurs when members of the public directly interact with the government, politicians, NGOs and private businesses (Quick and Bryson, 2016). There are several purposes for public participation, including: meeting legal requirements; embodying the ideals of democratic participation and inclusion; advancing social justice; informing the public; enhancing an understanding of public problems and exploring and generating potential solutions; producing policies, plans and projects of higher quality (Bryson et al., 2013).

Public participation can be of great benefit to a variety of processes. According to Ghose (2005), "by legitimising citizen [public] participation and local experiential knowledge, community organisations are better able to engage in contestations, defending their interests and gaining greater control" (p. 65). As Quick and Bryson (2016) describe, public participation has the advantage of providing new information relevant to the decision-making process, spreading awareness of an issue among government and the public, supporting a more just distribution of public resources and creating resources for problem-solving in the future by building trust and supporting the legitimacy of the processes. However, the authors also stress that whether public participation can actually have these benefits depends on four factors. The first factor is the issue of 'legitimacy' where a process of public participation needs to be legitimate in order not to "alienate the public from government and disrupt the implementation of policy decisions" (Quick and Bryson, 2016, p. 161). Quick and Bryson (2016) suggest that the stakeholders are more likely to accept a decision if they believe that it was reached in a legitimate way. If they perceive the decision-making process as being manipulative in any way, it leads to unacceptance and dissent. The second factor is 'diversity and inclusion'. Quick and Bryson (2016) point out that the majority of participatory processes are not inclusive because there is a tendency to involve the usual suspects, and it does not provide a space for joint learning. They argue that participation needs to be inclusive of different views and interests and needs to involve a diversity of stakeholders. The third factor is described as 'expertise and participation' where the authors point out that expert knowledge has traditionally been given preference over lay knowledge in policy-making and that this disbalance can lead to poor outcomes since it does not consider other types of knowledge. This issue is well known in planning theory (Rydin, 2007) and in heritage studies (Smith, 2006), as already mentioned under the topic of heritage valuation. The fourth and last factor is the 'challenge of designing participation processes', which refers to the importance of a good design of participation to reach a successful outcome. These factors can also be applied to evaluate the success of public-private partnerships.

2.4.3 Partnerships

Public-private partnerships (PPPs) are a form of collaborative (Gash, 2016) that "bring together the skills and assets of all partners to deliver a public service or good for public consumption by providing incentives for both public and private sectors" (Macdonald and Cheong, 2014, p. 15). Hodge and Greve (2007) see PPPs as a governance tool in the form of a cooperative arrangement between public and private actors.

Klijn et al. (2006) define two forms of PPPs: contract and partnership. These two forms have different characteristics in terms of organisation, method of co-production, division of responsibility, circumstances in which they are appropriate to implement, and their purpose. The contract relationship, as the name suggests, is based on a contract between a client (public party) and a contractor (private party) with a clear division of responsibility and strict rules for tendering, competition and other phases of creating the partnership. A PPP as a contract integrates "the design, building, financing and commercial operation of an infrastructure project (such as a road, or a building […])" (Klijn et al., 2006, p. 3). On the other hand, a PPP as a partnership (also called organisational cooperation project), is characterised by joint problem and solution specification, joint decision-making, shared responsibility and extensive co-production during the whole process – from defining the nature of ambitions to realising them.

A PPP as a partnership is usually implemented in urban regeneration projects which aim at the improvement of the living environment and strengthening of the local economy.

The way of generating added value also differs in each form. A contractual relationship generates added value through the efficiency of coordinating between the various components resulting in lower costs of the project and actors maximising their own profit. In a PPP as a partnership, actors maximise joint benefits by combining different activities and projects. This is a particular benefit of the partnership form of PPP because the individual projects and activities reinforce each other which then "makes it possible to achieve financial trade-off between profitable and less profitable, but socially interesting components" (Klijn et al., 2006, p. 3). Partnership PPPs are, according to Klijn et al. (2006), better suited for complex projects since contracting is more appropriate when there is a clear product or service that needs to be delivered. This partnership form of PPP, further referred to just as 'partnership', is the type of governance tool that is relevant to this research because, as mentioned previously, it describes the form of PPP used in area regeneration projects that this research focuses on.

According to Majamaa (2008), there are two types of public-private partnerships based on to which degree the civil society is involved. The commonly used term of public-private partnerships can be abbreviated as 'P3' and Majamaa has additionally introduced 'P4': public-private-people partnerships. The P4 model foresees citizens acting as project developers. The fourth P (people) can include "natural persons, legal persons with non-profit objectives […], non-profit organizations and various types of foundations" (Boniotti, 2023, p. 3). Both P3 and P4 foresee people, i.e. non-professionals who are not part of the private sector, as part of a partnership, but the extent of their involvement varies. The P3 model includes people in the partnership by informing them about processes or consulting with them on specific issues, whereas the P4 model sees them as active contributors throughout the whole (development) process. As Majamaa (2008) argues, the P4 model creates "possibilities for engaging new pro-active and positive participation methods and solutions, not only for the early stages of urban development process (planning and design), but also for construction, operation and management of local economic and social infrastructure" (p. IV). The P4 model is, therefore, a form of community participation as the citizens themselves become the co-designers, co-producers and co-evaluators (Boniotti, 2023). The categories of stakeholders in the public-private-people partnership are as follows (Boniotti, 2023, p. 4):

- (1) Public entities, i.e. the central government, local governments and public estate owners;
- (2) Private entities, i.e. businesses, developers and private owners;
- (3) People, i.e. common citizens, the non-profit sector and end-users.

Rojas (2012) argues that to achieve a successful regeneration and development of urban heritage, it is crucial to include all the stakeholders: experts on conservation and heritage, civil organisations, government bodies, local community, property owners, real estate investors, households and the business community. PPPs, in both forms of P3 and P4, are becoming a more common practice in planning and heritage as they include all the necessary stakeholders and can achieve high-quality outcomes as they break through the siloed systems in planning and heritage practice. In the regeneration of historic areas, PPPs attract funding and they can be a good way of involving local citizens who can contribute to emphasizing the past of the local community (Macdonald and Cheong, 2014).

PPPs in the heritage sector are particularly important because they can achieve collaboration among different sectors and so combine various skills, resources, funding opportunities and political influence (Macdonald and Cheong, 2014). According to Macdonald and Cheong (2014), the role of the public sector in the regeneration of historic areas is crucial because the public sector can create the conditions for the private sector to be involved in the first place. In addition to a financial contribution to heritage management and/or development, the public sector can also contribute to long-term protection by listing individual buildings, ensembles of buildings or whole urban areas. The authors point out that to reach positive outcomes, the government cannot act alone and that is why partnerships with the private sector and the civil society (residents, NGOs, community organisations, etc.) are important.

3. METHODOLOGY

3.1   General research strategy

The research process for this thesis made use of qualitative methods. This methodology is suitable when a new field of study is researched or when the researcher aims to explore and describe specific issues (Jamshed, 2014). In this case, the specific issue is the role and impact of partnerships in regeneration of heritage protection zones. To explore this topic in depth, this thesis uses a form of comparative cross-cultural research design (Bryman, 2012).

For the comparative element, this research is based on a multiple-case study approach. This includes two case studies from different cultural contexts: the Netherlands and England. The first one is the "Dorpsontwikkelingsmaatschappij" or DOM (Village Development Company) in the village of Ee in Friesland, which applies a method of public-private cooperation in the regeneration of the historic village core designated under the instrument of "Beschermde stads-en dorpsgezichten". The second case study is the "Heritage Action Zone" in Sunderland in England, which is a partnership scheme launched by the public agency of Historic England.

In general, case studies enable researchers to explore a phenomenon holistically where an issue is researched through multiple lenses (Baxter and Jack, 2008). A case study is a fitting approach in research that focuses on 'how' and 'why' questions and the contextual conditions of the phenomenon that are of importance for its understanding (Yin, 2003). Yin (2003) defines three types of case studies: explanatory, exploratory and descriptive. This research will use exploratory case studies because the aim is to explore specific cases where the intervention has no single set of outcomes (Yin, 2003). The two case studies present themselves in different contexts, and the aim is to understand the similarities and differences between them (Baxter and Jack, 2008). The benefit of this approach is that it offers reliable and robust evidence (Baxter and Jack, 2008). Yin (2003) defines a comparative approach as one of the six methods of reporting a case study. As Do Amaral (2022) argues, a "comparative case study approach […] offers productive and innovative ways to account sensitively to culture and contexts" (p. 57). Furthermore, Do Amaral suggests that collecting data from multiple case studies enables researches to gain insight into a phenomenon while still respecting the uniqueness of the single cases. Yin (2003) suggests two possible outcomes of multiple-case studies: either they provide similar results or contrasting results which can be predicted based on theory. In this research, the two case studies look into the phenomenon of participation of multiple sectors (public, private and civil society) in the regeneration of listed historic environment. The two case studies clarify the predispositions, challenges and opportunities of participation in nationally designated heritage protection zones. Additionally, they provide detailed information on the specific instruments, the areas where they were implemented and the public-private partnerships. In addition, the cases will be analysed based on the theories presented and evaluated whether they contradict or confirm the theories.

3.2   Selection of case studies

This research is based on the goal of understanding more about the heritage protection zones as an area-based heritage protection instrument and the governance of their spatial development. This research limits its scope to Europe (the European continent). Firstly, to get an understanding of the general characteristics of heritage protection zones, seven European countries and their instruments of heritage protection zones were looked at in detail. The aim was to choose countries in Western, Southern and Central Europe. The research focused on large countries with long-established heritage protection systems: Spain, France, Italy and Germany. Naturally, the Netherlands and England were considered as well, since they are the countries where the case studies were chosen. Due to the familiarity of the author of this thesis with the Czech language and its legal system, the Czech Republic was also added to this list to complete the examples of heritage protection zones and their definitions. Countries in these parts of Europe tend to have similarities in their heritage protection systems due to their common roots in the 19th century (Glendinning, 2013). These roots are further explored in Chapter 4.

Secondly, to obtain a deeper understanding of heritage protection zones, two specific heritage protection zone instruments were chosen. As this thesis has been written in a Dutch academic context, one of these instruments is the Dutch "Beschermde stads- en dorpsgezichten" or BSDG (Protected townscapes and villagescapes). The second instrument to serve as a comparison to BSDG is the English instrument of "Conservation areas". The Dutch and English instruments are suitable for comparison for a couple of reasons. Firstly, the heritage protection systems of both countries share common roots and the English system has had generally large influence on heritage protection systems in the whole Europe (Glendinning, 2013). This is explained in greater detail in the fourth chapter of this thesis. Secondly, the Netherlands and England are in close geographical proximity to one another which implies a frequent cultural exchange, in the past and the present, as well as similar climatic conditions that can be of influence on the built environment and architecture. Thirdly, both countries have a long history of institutionalised heritage protection with considerable experience.

The case studies aim to explore how development occurs in these heritage protection zones and what role civil society can play in this. Therefore, the selection process focused on partnership schemes which aimed for regeneration within heritage protection zones. The criterion for these public-private partnerships was that the residents living in or near the heritage protection zone should be involved in the regeneration process. The extent of their inclusion was the object of the analysis and its results can be found in the fifth chapter of this research. Such partnership schemes are fitting for this research as they provide information about governance structure within listed historic areas. Moreover, through studying them it is possible to understand the tension between protection and development that those specific historic areas might deal with. The selection criteria, therefore, required the case study to be a public-private partnership which focused on the regeneration of a historic protection zone in a village or a city. Given that listed heritage assets are public goods and often they fall into the responsibilities of the government, as it was established in the theoretical framework, the aim was to find a partnership programme that was initiated by a government or a government organisation. These PPPs ought to include the civil society and not only the public and private sectors. The timeframe of these partnerships was also important as they should be completed in order to analyse their results and impact on

the built environment and socio-economic system in the areas. Their duration should be similar in both cases, between 5 and 10 years, as well as the decade when they took place. The case studies were therefore to take place in the 2010s and 2020s.

3.2.1 Case study in the Netherlands

The village of Ee and its partnership with the former municipality of Dongeradeel was chosen as the Dutch case study for this research. The partnership was named Dorpsontwikkelingsmaatschappij, which translates to 'Village Development Company' in English, and will be further referred to as 'DOM'. This case study is fulfilling the criteria mentioned above. The programme was launched by the local government and it started in 2012 and finished in 2019. The focus of the DOM was on the regeneration of the protected village core in the village of Ee which is designated under the BSDG instrument as 'beschermd dorpsgezicht' (protected villagescape). Furthermore, the partnership involved local citizens and made them active partners in the DOM partnership. How this was done is explored in Chapter 5. The DOM in Ee was also chosen for its uniqueness. As established in the theoretical framework, rural regeneration is a topic that has not received much attention. Heritage as a catalyst is usually seen in urban contexts. Therefore, Ee's DOM is one of the few examples of a larger programme of rural regeneration and empowerment of the local rural community. Moreover, the first research into the initiative has shown that the DOM was generally a successful initiative and Ee had good media coverage (Redactie RTVNOF, 2016; Redactie RTVNOF, 2019; Van der Werf, 2018). So far, however, there have been no comprehensive studies on this.

3.2.2 Case study in England

For the English case study, the city of Sunderland was chosen for its participation in the Heritage Action Zone (HAZ) programme. This case study fulfils the above criteria just as well as the Dutch case study. It was a partnership launched by a government organisation which focused on including the local community in the process of regeneration. How and to what extent the local community was involved is further explored in Chapter 5. In the case of Sunderland, there was not one but three nationally designated heritage zones as the area of interest of the regeneration programme. The HAZ partnership in Sunderland started in 2017 and ended in 2022.

The case study of Sunderland is a suitable comparison to the Dutch case study. Compared to the rural context of Ee, the HAZ in Sunderland deals with complex urban surroundings. The local community, therefore, is much larger than in Ee. This difference is essential for the presented theory in Chapter 2 as the concept of heritage is not limited to only urban or rural environments. It is an all-encompassing concept and therefore, theoretically, the two case studies should produce similar results in terms of understanding heritage as a cultural process. This also goes for the theory on social capital and identity which is seen as necessary for social sustainability in a regeneration process.

3.3   Data Collection and Analysis

Data for a case study tend to come from a variety of sources such as archives, documentation, interviews or observation to achieve a holistic result (Baxter and Jack, 2008). In this research,

the data is collected through document analysis and interviews with key stakeholders. Bowen (2009) defines document analysis as "a systematic procedure for reviewing or evaluating documents—both printed and electronic (computer-based and Internet-transmitted) material" (p. 1). The types of documents that were of interest in this research were the following: organisational and institutional reports, survey data, press releases and brochures. In the case of studying the various heritage protection zones in selected European countries, legal document analysis was the primary method of research which focused on heritage protection laws in the chosen countries. According to Altheide et al. (2008), a qualitative approach to a document analysis "focuses on describing and tracking discourse including words, meanings, and themes over time" (p.127). The words and their meaning were the main focus in analysing the definition of the various protective instruments.

Interviews are the most common form of data collection in qualitative research (Jamshed, 2014). As Shackleton et al. argue, "in-depth interviews and life histories can be used to bring culturally derived understandings into the assessment of long-term social, ecological, economic and cultural changes" (2021, p. 111). One type of interview is a semi-structured interview, which is conducted with an individual or a group, making use of a semi-structured interview guide with open-ended questions that focus on specific topics (Jamshed, 2014). The interview includes core questions and complementary questions (Jamshed, 2014). This type of interview allows for the collection of reliable data that helps to understand the issue at hand in depth (Shackleton et al., 2021). The selection of interviewees is purposive. Purposive sampling allows researchers to collect necessary information about the cases, and unlike random sampling, it does not require a certain sample size to provide a sufficient basis for the findings (Patton, 2015). In this research, the interview questions were always tailored to the specific respondent. However, all interviews were conducted in a similar manner. The questions covered issues faced by the city or town before and after the partnerships, complications related to the heritage status of the areas, civil society involvement, specific projects within the partnerships, and the vision for the future of the city or village.

The interviewees were selected based on the topic at hand. For collecting information on the development of the beschermde stads- en dorpsgezichten and the degree of participation in the Netherlands in general, interviews were conducted with a municipal policy maker and experts in the field from the Rijskdienst voor het Cultureel Erfgoed (the Netherlands Cultural Heritage Agency) (see Table 2). The latter was facilitated by absolving an internship in the organisation as part of this thesis research. The goal of these interviews was to get a better understanding of the BSDG instrument and to obtain initial information on the state of their development and the role of civil society within it.

Table 2

Interviewees - BSDGs		
Amsterdam Municipality	Interviewee #1 - Anette van Dijk - Senior advisor Policy and Strategy Monuments and Archaeology, Municipality of Amsterdam	02.05.2023
RCE	Interviewee #2 - RCE Programme manager	27.03.2023
RCE	Interviewee #3 – RCE Senior policy advisor	03.04.2023
RCE	Interviewee #4 - Peter Timmer – senior adviser on cultural heritage	06.07.2023

Another set of interviewees was chosen for the case study of the DOM in Ee in Friesland (see Table 3). The interviewees were members of the former DOM team, the village board in Ee or the municipality of Noardeast-Fryslân. As later explained in Chapter 5, the municipality of Noardeast-Fryslân was established in 2019. The DOM in Ee ran under a different municipality – the municipality of Dongeradeel. Therefore, some of the interviewees who nowadays work at the Noardeast-Fryslân municipality used to have ties with Dongeradeel and therefore they were able to provide more information on the DOM in Ee. Due to language limitations, some of the interviews were conducted in a written form, with respondents providing detailed text responses to a series of open-ended questions that would normally have been asked in a personal interview.

Table 3

Interviewees - DOM case study		
Noardeast-Fryslân Municipality	Interviewee #5 - Saapke Nijhuis – Village coordinator Interviewee #6 - Wieke Kooistra – Policy support officer	24.05.2023
Province of Friesland	Interviewee #7 - Sjoerd Hoekstra – DOM programme manager	08.05.2023
The village of Ee	Interviewee #8 - Former president of DOM in Ee, current president of the village board in Ee	21.06.2023
The village of Ee	Interviewee #9 and #10 - members of the former DOM team in Ee	07.06.2023

In the case of the English instrument of conservation areas, an interview was conducted with two employees of Historic England (see Table 4), which is a government agency caring for England's heritage assets. This interview also provided information about the case study in Sunderland. These interviewees served as gatekeepers for further contacts about the case study in Sunderland. The other interviews were conducted with people who were (or still are) involved in specific architectural regeneration projects in the HAZ area in Sunderland (see Table 5).

Table 4

Interviewees – conservation areas		
Historic England - team	Interviewee #11 - Historic places adviser Interviewee #12 - Architect at Historic England	23.05.2023

Table 5

Interviewees – Conservation areas and HAZ case study		
Historic England	Interviewee #11 - Historic places adviser Interviewee #12 - Architect at Historic England	23.05.2023
Church Conservation Trust	Interviewee #13 - Tracey Mienie – Centre manager, involved in the Seventeen Nineteen Church project	31.05.2023
Newcastle University	Interviewee #14 - Loes Veldpaus – involved in the Pop Recs project	01.06.2023

The data from the interviews were analysed through the form of open coding (Bryman, 2012) based on an interview recording or notes taken by the author. This way of coding allows approaching the data without any previous bias on concepts or categories within the interviews. Themes were identified based on the theoretical framework in terms of the different subsystems of social capital (cooperation, trust, participation and sense of belonging) and the concept of identity as presented in theory by Izadi et al. (2020), along with a connection to Smith's (2006) theory on heritage as a cultural process and to the theories on governance. Specific emphasis is put on the role of the public sector, the private sector and civil society. The analysis looks into connections between the context of the specific case study and the extent to which the individual sectors were included and empowered. The results of the analysis can be found in Chapter 6.

3.4   Ethics

This research followed principles of ethics in conducting interviews as part of qualitative research. Before the interviews, the interviewees were made aware of the topic and the aim of the research. Informed consent is a crucial part as it is an "ethical and legal requirement for research involving human participants" (Nijhawan et al., 2013, p. 134). The participatns were introduced to the research via email and the subject of this thesis was introduced then and once again at the beginning of the interview. Most of the interviews were conducted online. Prior to conducting the interviews, consent was sought to record the interviews for research purposes. Most of the interviews were recorded, however, in some cases, notes were taken. Participation in this research was voluntary. To avoid violating the privacy of the interviewees, full names are used only in cases where explicit consent has been obtained. The final version of this research is made accessible to all the participants in this research to maintain transparency.

3.5   Reliability and validity

Reliability and validity are key aspects of qualitative research. Research reliability bases on "consistency, stability and repeatability" of the research as well as accurate data collection (Brink, 1993, p. 35). Reliability in this research is obtained through the criterion for case study

selection and using theory to inform data collection and analysis. Furthermore, as previously mentioned, semi-structured interviews were used which ensure the reliability of collected data since the interviews follow the stream of information from the interviewee and do not strictly follow predefined questions.

Validity refers to the "extent to which research findings are a true reflection of reality" (internal validity) and to the "extent to which such representations or reflections of reality are legitimately applicable across groups" (Brink, 1993, p. 35). Internal validity was achieved through consultation with cultural heritage experts within RCE and feedback from experts within PBL. This work was undertaken as part of a joint internship with these organisations. Regular meetings were also held with supervisors in both organisations. In terms of external validity, meaning how the conclusion of this research applies to other heritage protection zones in the Netherlands and England, the results provide information on two specific cases that cannot be taken as a generalization for all heritage protection zones and participation in their regeneration. However, other heritage protection zones in a rural context or an urban context may face similar challenges. For these places, the case studies could serve as a source of inspiration.

For this thesis, multiple documents in languages other than English were analysed. It is therefore possible that an error occurred in translating these documents or making a mistake when interpreting such translation. While reading the policy documents, an observer bias could have also occurred where the researcher's background, opinions or prejudices have an impact on the interpretation of collected data. The language was also a barrier in conducting interviews where some of them were conducted in a written form rather than in person. This could have led to misinterpretation of the written answer which could have resulted in alteration of the initial information. However, by combining document analysis and interviews as methods of data collection, such bias can be minimized (Bowen, 2009).

4. HERITAGE PROTECTION ZONES

Historic areas within the built environment are to be seen all across the European landscape. Due to their special character and high cultural-historical value, many of these are protected through national legislation in the form of heritage protection zones. The most renowned protected areas can be seen in historic centres of major cities such as Amsterdam, Prague, Vienna or Rome. However, not only centres but also city peripheral areas, neighbourhoods, villages and landscapes can be designated as heritage protection zones for their special cultural-historic character. These zones can vary in size, architectural style, urban layout and the decade in which they were constructed. Even though the designation of whole areas has been a common practice in all European countries since the second half of the 20th century, there are no universal guidelines for what ought to be seen as an 'area of special character'. This is due to the fact that heritage is a very complex and context-bound concept and every country has its own legal system, characteristic culture and unique set of values which reflect themselves in heritage designations. Moreover, within these countries, there are further subdivisions into provinces, regions, municipalities and local units, which in turn have their own values and unique views on what they see as heritage. This results in one common instrument, zoning, being used in many different ways but usually with one primary goal: protection. In other words - controlling undesirable development.

Heritage protection zones are part of a much larger system of cultural heritage which spans from local authorities and national heritage agencies to international organisations such as UNESCO (the United Nations Educational, Scientific and Cultural Organization) or ICOMOS (The International Council on Monuments and Sites). Cultural heritage and the systems of its protection find themselves in a broader historical, political, societal and economic context which also have further implications for its governance. The following section elaborates on the characteristics of this context and provides crucial background information in terms of the development of the heritage protection system and governance and concludes with a comparison of heritage protection zone instruments in European countries.

4.1 Development of heritage protection in Europe

Heritage protection zones are one of the many heritage assets that nowadays create monument lists in European countries. Listing is a core part of the heritage protection systems as it officially acknowledges the value of a heritage asset and therefore provides its status with a legal basis. It is a common practice for national and local governments to designate objects, buildings, ensembles or areas as heritage for their cultural-historical values. It is important to understand how this system came about because it has an impact on how cultural heritage is treated in current practice.

4.1.1 History of the Conservation Movement

Conservation in the sense of a modern movement informing institutionalized heritage policies has its roots in the late 18th and early 19th centuries when the European environment and culture were experiencing multiple processes of change. At the outset, conservation was not mainly concerned with preserving an aesthetic image, but rather with making use of the past for various other objectives. As Glendinning (2013) explains, "France and Britain, around 1800, developed

parallel modern revolutions, both exploiting monuments as agents of stabilisation from within" (p. 67). On one hand, heritage was instrumentalised in modern politics as a result of the rise of nationalism induced by the French Revolution of 1789 (Smith, 2006). Heritage was the expression of a nation's identity and it was France who introduced the notion of a 'national monument' for the first time (Svoboda, 2013). On the other hand, heritage both underpinned and opposed the quick pace of progress. In Britain, the Industrial Revolution introduced social and economic changes and with it processes that in 50 years' time transformed a largely rural landscape into a modern urban society (Glendinning, 2013). The progress has inevitably resulted in changes to the landscape, often at the expense of historic areas. Therefore, the need to protect the past was even greater as the built history was disappearing while the Romantic Movement fuelled the resistance to modernity and revelled in nostalgia for architectural ruins (Glendinning, 2013).

During the 19th century, there was a growing necessity for more structured approaches to identifying, evaluating, and conserving national monuments, which led to the institutionalisation of monument care (Svoboda, 2013). As Janssen et al. (2017) suggest, the heritage practice evolved chronologically from a sectoral approach where heritage is "isolated from spatial transformation by being listed as protected monuments and/or landscapes" (p. 12) to a vector approach which aims to emphasize the intangible aspects and the narrative of the built environment rather than focusing on its physical aspects. The beginning of the sectoral approach dates back to the time of the official institutionalisation of cultural heritage. In England, for example, this started as early as 1882 with the Ancient Monuments Protection Act. In Germany, the Monument Protection Act (Denkmalschutzgesetz) was approved in 1902. In France, one of the earliest heritage policies was enacted in 1913 and in Spain, the law to protect and conserve the country's cultural heritage took force in 1933. Thus, the sectoral view of heritage built the very primary fabric of European heritage legislation. The first designated monuments and areas in Europe therefore complied with the dominant idea of heritage of that time and so this imprinted itself in society's comprehension of heritage. Since then, subsequent cultural heritage policies and laws have built on and refined these documents.

4.1.2 International treaties

In the 20th century, multiple international charters and conventions were drawn up which aimed to provide unified guidelines on principles of conservation (see Table 6). One of the first major documents was the Charter of Venice 1964 which became a basis for national as well as international heritage policies (Jokilehto, 1998). The Charter is based on the principles of material authenticity and a clear distinction between old and new built fabric, and condemns any pastiche or architectural copies, let alone reconstructions of partially or completely destroyed heritage. Furthermore, it advocates for governmental bodies to take over responsibility for national heritage, therefore implying the use of public funds for heritage protection, conservation and management (Rojas, 2014). The Charter embodies the rather traditional views of heritage and its care and since it was the basis for many national heritage policies, the heritage protection systems still tend to reflect this traditional approach. The gradual shift of heritage discourse towards the vector approach is reflected in other documents that followed the Charter of Venice.

Table 6

Timeline of important charters and conventions					
1964	1975	1994	2000	2005	2011
The Charter of Venice	The Declaration of Amsterdam	The Nara Document	The European Landscape Convention	The Faro Convention	The UNESCO Recommendation on the Historic Urban Landscape

The next important document was the Declaration of Amsterdam of 1975 which aimed to break away from the sectoral approach. The declaration emphasizes the importance of integrating heritage in regional and national planning processes and it strives to encourage local authorities to involve citizens and to focus on social factors in general. In 1994, the Nara Document expanded on the traditional notion of authenticity. The Charter of Venice has been criticized for being Eurocentric and giving undue emphasis only to material authenticity (Boccardi, 2019). The Nara document introduces more aspects of authenticity. As Article 13 of the document states, "authenticity judgements may be linked to the worth of a great variety of sources of information. Aspects of the sources may include form and design, materials and substance, use and function, traditions and techniques, location and setting, spirit and feeling, and other internal and external factors." The document also stresses the uniqueness of different cultural contexts, as different cultures have specific views of their heritage. The Nara document generally provided more support and understanding for individual views on heritage and emphasized the importance of local communities and cultural contexts in heritage definition and management.

The Faro Convention 2005 was another important milestone for the role of local communities in heritage. The convention urges the states which would sign and ratify the document to "recognise that rights relating to cultural heritage are inherent in the right to participate in cultural life" (Article 1). The Faro Convention builds on the European Landscape Convention of 2000 because it puts people first along with the variety of their views and aspirations and therefore contrasts with the building-centred approach of conservation in the Charter of Venice (Fairclough et al., 2014). The convention encourages countries to implement democratic participation throughout the processes of heritage identification, protection and development and to involve different stakeholders in open debates regarding heritage, its challenges and solutions (Article 12). The Faro Convention also encourages communities to be the creators of the narrative and even to redefine values of existing heritage to expand on established experts' opinions (Colomer, 2021).

The UNESCO Recommendation on the Historic Urban Landscape of 2011 is the latest international document which expanded on the meaning of urban heritage as a whole landscape. Through this document, UNESCO argued for urban conservation to go beyond individual monuments and historic sites to understand these areas as whole landscapes with their multiplicity of cultural and historical layers (Rojas, 2014).

The extent to which these documents have been practically implemented differs from country to country and case to case. This is due to the fact that even if the states sign these documents, they are not obliged to ratify them. Ratification would make these documents legally binding.

Furthermore, the documents usually do not provide detailed guidelines for the implementation of its principles. For example, in the case of Faro, the document does not specify how the participation of communities should proceed, nor the rules for such a process which result in different levels of commitment to the Faro principles (Colomer, 2021). However, these are still important documents as they can steer the development of heritage protection and enhancement to a certain degree in countries in Europe and elsewhere. Responsibility for whether and how their principles are applied in practice usually rests with governmental bodies.

4.2 Governance and participation in cultural heritage

Traditionally, the governance of cultural heritage has been characterised by a top-down approach, an institutionalised definition of heritage and low citizen participation (Sokka et al., 2021). As Lee (2016) explains, "the classic governance model of heritage conservation is state ownership and management of a given heritage site whereas the market model in the neoliberal age is private ownership of a resource with government regulation and sometimes funding" (p. 5). Cultural heritage, having the characteristics of a public good, has been traditionally funded by the public sector (Allegro and Lupu, 2018). However, this has been changing in recent years due to deregulation and privatisation (Abdou, 2023) and the realisation that top-down policies are becoming ineffective in the face of the growing complexity of the problems that need to be addressed on larger scales (Allegro and Lupu, 2018). In combination with the frequent lack of funding and other resources for cultural purposes, it has become increasingly important to actively engage the private sector and civil society as well to support heritage protection and its development (Macdonald & Cheong, 2014). Even though the concept of participation in cultural heritage is in its early stages (Stiti and Rajeb, 2022), participatory methods and partnerships between the public, private and civil society are becoming more and more common. This is all the more important because the question of who should decide the fate of heritage and the problematic issues of who to include and who to exclude have been a long-standing theme in heritage studies (Bender, 1993; Stegmeijer and Veldpaus, 2021) and planning (Hendriks, 2014; Healey, 2008; Rydin, 2007). Many criticize the primary dominating role of experts in such processes (Smith, 2006; Ashworth et al., 2007) and call for inclusion and a greater degree of participation.

The degree of participation may differ from case to case, but there can still be general conclusions drawn as the research by Li et al. (2019) shows (see Fig. 8). Li et al. (2019) conducted an analysis of 60 cases from around the world, showing that the most common levels of participation in cultural heritage are 'information' and 'consultation'. The more advanced levels of participation, namely 'involvement' and 'cooperation', were less frequently observed. Additionally, it was observed that the highest level of participation, 'empowerment', was present in fewer than 20% of the analysed cases. This research shows that in current practice, the extent to which the community can influence the outcomes of heritage management decreases almost exponentially from the first degree to the highest degree of participation. Furthermore, this exponential tendency can be also observed in the different phases ('steps') of a process, namely identification, programming and execution. As the research showed, communities are mostly included in the first step, the 'identification', less so during the 'programming' and the least in the last step of execution.
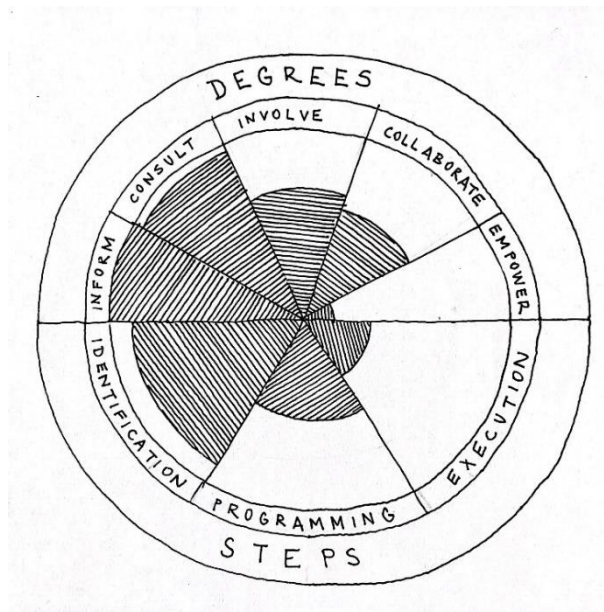
Fig. 8: Quantitative overview from systematic literature review on community participation in cultural heritage management, adapted (Li et al., 2019, p. 5)

4.3 Comparison of area-based protection instruments in Europe

In most European countries, the planning system is based on the principle of zoning as a regulation of land use (Janin Rivolin, 2008). Spatial and land-use plans are one of the most widely applied instruments in European spatial planning on all levels of government (OECD, 2017). Countries such as the Netherlands, Germany, Austria, Spain and the Czech Republic base their decision-making processes in terms of land-use and development on specific predefined rules and laws in their land-use plans (OECD, 2017; Schulze Bäing & Webb, 2020). The UK is an exception on the European continent as their system is not regulatory but discretionary, meaning, that the development control system is based on a planning application and permission system (Schulze Bäing & Webb, 2020). However, as the local authorities in England, Scotland, Wales and Northern Ireland do designate conservation areas which must be reflected in the local policies, it can be said that zoning is present in the British heritage practice as well. To what extent the heritage protection zones experience further spatial development depends on how these instruments are implemented and also further policies, schemes, grass root initiatives and other factors. A designation does not automatically lead to creating a development vision for the listed historic area. In fact, some designated heritage protection zones can even be seen as 'at risk' due to poor management and lack of finances or general care. Therefore, heritage protection zones may vary in their degree of maintenance and they can continue to develop but also deteriorate over time. Some areas can also stay in the 'in-between state' of opposing change and favouring constancy. Such places have been criticized in the past for being mere 'open-air museums' (Čamprag, 2017; Lovell & Bull, 2017) that inordinately worship the past or as 'consumption landscapes' (Althof, 2022) that exploit heritage for profit.

A closer analysis of area-based protection instruments for cultural heritage in a selection of European countries shows a variety of laws, years of their introduction and names of the area-based instruments (see Fig. 9, Table x). First of all, the introduction of heritage protection zone

instruments occurred at various times, but generally, it took place in the second half of the 20th century, specifically during the period from the 1960s to the 1980s. An exception to this is Italy where the focus on whole areas was introduced as late as 2004 in the Cultural Heritage Code in the form of "centri storici" or generally as "aree di notevole interesse pubblico" (areas of significant public interest). Italy, however, is a specific case as the protection of whole landscapes is integrated into Article 9 of its Constitution. The protection of cultural heritage has a long tradition in Italy, dating back to 1602 when the first law on the control of cultural property was passed (Calabi, 2020). In Germany, there is no national legislation for heritage protection because that is a matter of the 16 individual federal states within Germany. That is why Figure 9 shows at least one example of Bavaria, the largest state in Germany. In all the countries shown on the timeline in Figure 9, the first legislation documents were revised, updated or transformed into new laws and acts. An example where the most changes occurred is France which changed the name of their conservation zones and the accompanying legislation four times since 1962.

Secondly, heritage conservation zones tend to be called differently in each country. The instruments include terms such as 'sector', 'site', 'zone', 'reserve' or 'ensemble'. In the case of some names, it is not advisable to translate them into English since the terms can be so specific that an English equivalent cannot be found. That is the case of the Dutch "Beschermde stads- en dorpsgezichten" which would loosely translate as "Protected townscapes". However, the Dutch word 'gezicht' translates into 'view' which can have certain implications for how the instrument is understood among policy makers and the public because it emphasizes the visual aspects of heritage protection. This does not mean that the linguistics of these instruments fully define what they protect and how they are implemented and dealt with in practice, but it is an important factor which mirrors the unique cultural contexts of every country. That is why these instruments, in case there is no direct translation into English, are referred to in their original phrasing.
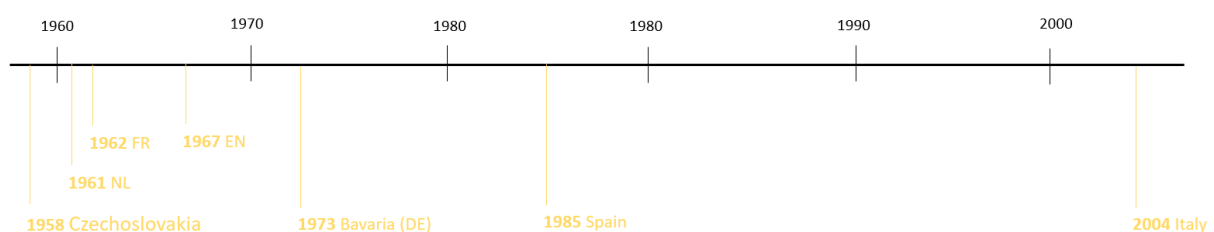
Fig. 9: Timeline of legal introduction of heritage protection zones in seven European countries

Thirdly, every country provides a definition of what is included under their heritage protection zones. Although the phrasing of the definitions varies, they share similarities in a number of aspects. Most of the instruments, in one way or another, refer to immovable property as an object of protection and emphasize its physicality and materiality. One of the main focuses lies in the visual qualities of the area which is highlighted through the use of specific words such as 'aesthetic', 'appearance' and 'beauty'. In this regard, the Italian areas of notable public interest also include scenic views. This shows a similarity to the visual aspect of the Dutch instrument. All instruments declare their aim of protection in the form of 'conservation' or 'preservation'. Several instruments, such as the French and the English ones, specifically mention the

'enhancement' of heritage as an objective. It is, however, not specified further in what forms such enhancement should take place.

Finally, there are also some instruments whose definitions include aspects which are not mentioned in any other of the analysed phrasings. One of them is the Spanish "Sitio Histórico" which refers to intangible aspects of the living environment such as 'memories', 'traditions' as well as 'cultural and natural creations'. This contrasts with the strong focus on the physical domain in all other definitions (see Table 7). Another one is the French Sites Patrimoniaux Remarquables whose definition explicitly states that these heritage protection zones "are equipped with tools for mediation and citizen participation" (article L631-1). Again, there are no further specifics on which tools these are or how and when such participation takes place. However, it is a rare example of mentioning participation and the role of citizens directly in connection with heritage protection zones. That does not mean that these documents do not consider the engagement of the public, on the contrary, many of the newer documents and the revised versions of older documents encourage public participation and acknowledge a general multiplicity of views on heritage. However, they do not specify more than that and therefore it can vary from case to case how participation actually proceeds in heritage processes in different areas.

Table 7

Overview of area-based protection instruments in seven examples of European countries			
Country	Instrument	Law	Definition
Spain	Bien de Interés Cultural – Conjunto Histórico, Sitio Histórico	Spanish Law 16/1985 on Spanish Cultural Heritage (Ley 16/1985 del Patrimonio Histórico Espanol)	Conjunto Histórico: "*grouping of immovable property that forms a settlement unit, continuous or dispersed, conditioned by a physical structure representative of the evolution of a human community because it bears witness to its culture or constitutes a use and enjoyment value for the community. […] any individualized nucleus of buildings included in a higher unit of population that meets these same characteristics and can be clearly delimited*" (Art. 15) Sitio Histórico: "*place or natural area linked to events or memories of the past, to popular traditions, cultural or natural creations and to the works of man, which have historical, ethnological, paleontological or anthropological value*" (Art. 15) --- "*The <u>conservation</u> of the Historical Sites [Conjuntos históricos] declared Assets of Cultural Interest entails the <u>maintenance</u> of the urban and architectural structure, as well as*

			the general characteristics of its environment." (Art. 21)
France	Sites Patrimoniaux Remarquables	French Heritage Code 2016	*"Remarkable heritage sites are towns, villages or districts whose conservation, restoration, rehabilitation or enhancement is of public interest from a historical, architectural, archaeological, artistic or landscape point of view." (L631-1)* *"Rural spaces and landscapes which form with these towns, villages or neighbourhoods a coherent whole or which are likely to contribute to their conservation or enhancement can be classified in the same way." (L631-1)* --- *"The classification as remarkable heritage sites has the character of a public utility easement affecting the use of land for the purpose of <u>protection</u>, <u>conservation</u> and <u>enhancement</u> of cultural heritage. Remarkable heritage sites are equipped with tools for mediation and citizen participation." (L631-1)*
	Aires de mise en valeur de l'architecture et du patrimoine (AVAP) (Area for the enhancement of architecture and heritage)	"Grenelle II" 2010	
	zones de protection du patrimoine architectural, urbain et paysager (ZPPAUP) (architectural, urban and landscape heritage protection zones)	Act of 1993	
	secteurs sauvegardés (safeguarded sectors)	Act of 1962 (Loi Malraux)	
Italy	Immobili ed aree di notevole interesse pubblico – centri storici (Properties and areas of significant public interest - historic centers)	Codice dei Beni Culturali e del Paesaggio (2004) (Cultural Heritage Code)	*"complexes of immovable things that make up a characteristic aspect having an aesthetic and traditional value, including historic centers and nuclei" (Art. 136)* *"scenic beauties and so are those viewpoints or belvederes, accessible to the public, from which the spectacle of those beauties is enjoyed" (Art. 136)*

Czech Republic	Památková zóna (Monumental zone)	Czech National Council Act No. 20/1987 (Zákon České národní rady č. 20/1987)	*"An area of a settlement or part thereof with a smaller proportion of cultural monuments, a historic environment or part of a landscape unit which has significant cultural values" (Art. 6)*
	Památková rezervace (Monumental reserve)	Act No. 22/1958 Coll., on cultural monuments (Zákon č. 22/1958 Sb., o kulturních památkách)	*"An area whose character and setting is defined by a collection of immovable cultural monuments or archaeological finds" (Art. 5)*
Germany – Bavaria	Baudenkmal (Architectural monument) or bauliche Anlagen / Ensemble	Bayerisches Denkmalschutzgesetz – BayDSchG, 1973	*Baudenkmäler: "structures or parts thereof from past times, […] including historical furnishings and fittings intended for them […]. Movable objects may also be historical furnishings if they are integral components of a historical spatial concept or of a historically completed refurbishment or redesign that is equivalent to it. Garden sites that meet the requirements of paragraph 1 are considered monuments." (Art. 1)* *Bauliche Anlagen (Ensemble): "A majority of the 'Bauliche Anlagen' (Ensemble) can also be considered as 'Baudenkmäler', even if none or only some of the associated buildings meet the requirements of para. 1, but the overall appearance of the place, square or street is worthy of preservation." (Art. 1)*
England	Conservation area	The Civic Amenities Act 1967	*"areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance" (Art. 69)*
The Netherlands	Beschermde stads- en dorpsgezichten (Protected townscapes and villagescapes)	Monumentenwet 1961	*1961: "Groups of real property, including trees, roads, streets, squares and bridges, canals, waterways, ditches and other waters, which with one or more monuments belonging to the group form a picture, which is of general interest because of the beauty or character of the whole."* *Monumentenwet 1988: "groups of immovable property, of general interest because of their beauty, mutual spatial or structural cohesion, scientific or cultural-historical value and in which groups one or more monuments are located"*

5. HERITAGE PROTECTION ZONES IN THE NETHERLANDS AND ENGLAND

This section will provide detailed information on the instruments of heritage protection zones in the Netherlands and England. Each instrument is provided with a general institutional context as well as common governance practices within that country. To illustrate the practice of public-private partnerships and local community participation in the regeneration of heritage protection zones, two case studies are presented with each protective instrument. The Dutch case presents the 'beschermd dorpsgezicht' in the village of Ee (see Fig. 10), in the Province of Friesland whereas the English case explores a cluster of conservation areas in the city of Sunderland (see Fig. 11) in the Region of North East England. Both of these partnerships were established to tackle the physical deterioration and economic deprivation of local historic areas. Prior to the programmes, both places were struggling with socio-economic problems and deterioration of the historic environment. The aim for each partnership was the same: to improve the built environment in a heritage protection zone and support the local economy through the area's cultural heritage.

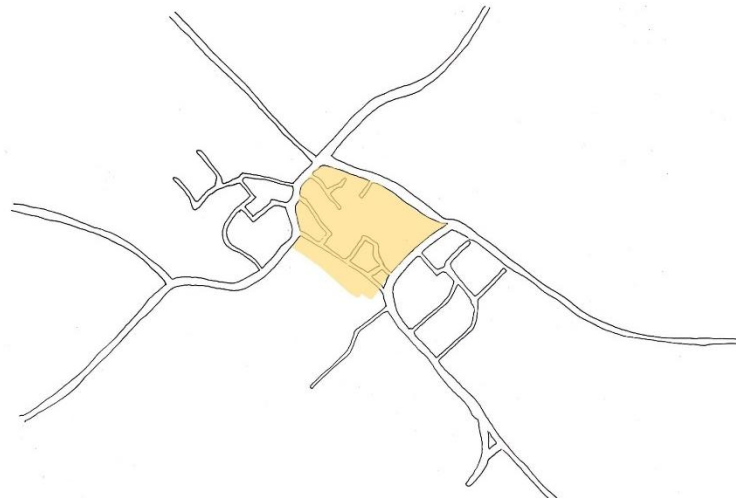

Fig. 10: Simplified depiction of the heritage protection zone around the historic village core in Ee in Friesland
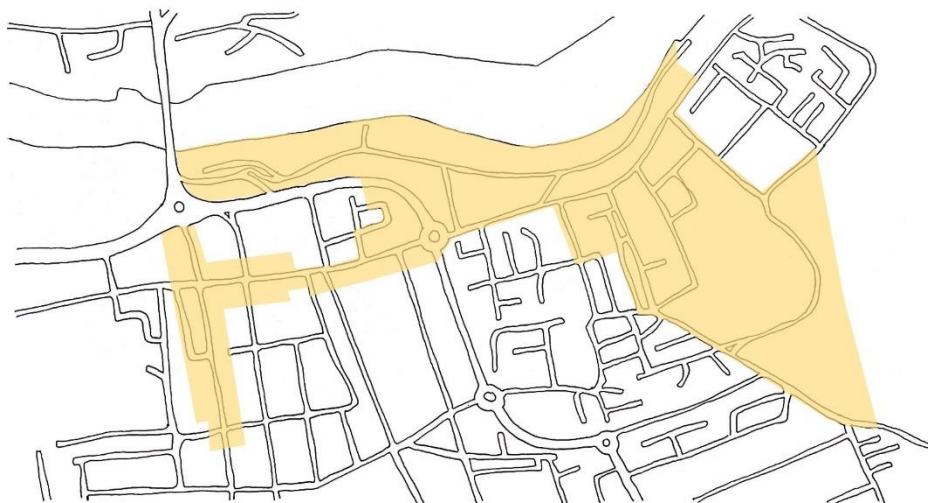

Fig. 11: Simplified depiction of a cluster of three heritage protection zones in the East End area in the city of Sunderland

5.1   Beschermde stads- en dorpsgezichten (the Netherlands)

The heritage protection zones in the Netherlands are called "Beschermde stads- en dorpsgezichte" (BSDGs) which can be loosely translated as "Protected town- and villagescapes". This instrument was introduced in 1961 as part of the Monuments Act (Monumentenwet) and has been since then taken up by other legal documents that followed: the Monuments Act (Monumentenwet) 1988 and the Heritage Act (Erfgoedwet) 2016. The BSDGs are defined as "groups of immovable property, of general interest because of their beauty, mutual spatial or structural coherence, scientific or cultural-historical value, and in which groups there are one or more monuments" (RCE, 2020, p.11). While this definition doesn't cover the intentions for the conservation of the sites, the following goal of the designation, which is also incorporated in many designation files, is used: "The purpose of the designation is to recognise the area's characteristic structure and spatial quality associated with historical development as a weighty interest in future developments within the area. The designation thus aims to provide a basis for spatial development that responds to, utilises and builds on the qualities present" (P. Timmer, personal communication, July 6, 2023).

The BSDGs can protect urban environments and rural settlements on a national level. Locally designated BSDGs also exist, but are based on local legislation. The national designation lapsed in 2016, but local designations are still possible. To date, there are 472 nationally protected areas. These areas have a building history predating the 1940s, although legally designating areas with a recent building history is also possible (there is no restriction in the law when it comes to the age of an area). However, in line with the national policy framework for cultural heritage (Momo, Modernisering Monumentenzorg, 2009) it is not possible to designate new areas as BSDG.

The designation is arranged on a national level by ministries responsible for culture and planning. Actual protection of the site's heritage features however should be implemented in a land use plan (instrument of the Spatial Planning Act) that is established by the City or Municipality Council. This was also arranged by the Monumentenwet in 1961. The BSDGs are therefore directly embedded in the Dutch heritage protection and planning system which has implications for its function and also its future.

5.1.1 The Dutch system of heritage and planning

Heritage policy has changed radically in the past decades as it shifted from a sectoral to an integral approach (Meurs et al., 2022). Heritage is a crucial component of the living environment. The integral protection of cultural heritage is achieved through the Heritage Act (Erfgoedwet) which was last updated in 2016. Further integration will be achieved through the Environmental Act (Omgevingswet) which is not in force yet, but it will apply from the beginning of 2024. In the future, the designation of the beschermde stads- en dorpsgezichten and regulations for its development will fall under the Environmental Act. The principles of the Monuments Act (Monumentenwet) from 1988 will remain in effect until 2024, when this authority will be transferred to the new Environmental Act in its entirety. Since this research was conducted before 2024, it regards the existing legislation in 2023 which are the Monuments Act 1988 and Heritage Act 2016.

Planning in the Netherlands falls under the Ministry of the Interior and Kingdom Relations (Ministerie van Binnenlandse Zaken en Koninkrijksrelaties) and the Ministry of Infrastructure and Water Management (Ministerie van Infrastructuur en Waterstaat). The Ministry of Education Culture and Science (Ministerie van Onderwijs, Cultuur en Wetenschap) is responsible for heritage. The Cultural Heritage Agency of the Netherlands (Rijksdienst voor het Cultureel Erfgoed - RCE) is under the Ministry for Cultural Heritage and is responsible for generating knowledge, providing advice and, in a joint effort with the Ministry, implementing various laws, regulations and policies in the field of cultural heritage. The state has responsibility for the legal system and policy-making. Provinces have a directing role (and responsibility for provincial heritage), while municipalities have an executive role.

Generally, the integration of heritage and cultural-historical values in planning has been an important topic in Dutch policy since the policy document Nota Belvedere 1999 which proposed conservation through development (Veldpaus et al., 2019). The inclusion of cultural heritage in development is currently done in two ways. Firstly, it is generally done through listing, which ensures that the history of the area plays a role in the future development of villages, towns and cities (Prins et al., 2014). Listing strives for development in a controlled manner, meaning that it allows a limited number of changes and enforces restrictions on major or unsuitable development. In this case, 'unsuitable changes' would be anything that disturbs the values which were defined during the designation of the areas.

Secondly, the inclusion of cultural heritage is done through spatial planning. The National Strategy on Spatial Planning and the Environment (NOVI) is the policy framework on a national level. This strategy has appointed cultural heritage as a matter of national interest. This means planning activities on all government levels should take cultural heritage into account. Furthermore, the Spatial Planning Decree (Besluit ruimtelijke ordening – Bro) from 2011 prescribes that cultural-historical values are supposed to be integrated holistically into spatial planning endeavours. The municipalities should carry out an analysis of the cultural-historical values within their boundaries and integrate the conclusions from this analysis into their land-use plans. The land-use plans (bestemmingsplannen) fulfil a dual function: to steer development, meaning to support desired land uses and prevent undesired land uses, and to safeguard the function of the area in terms of maintaining certain uses on parcels such as living, offices or mixed functions (Buitelaar and Sorel, 2010). Each municipality in the Netherlands is obliged to create a land-use plan for their territory with accompanying text explaining the characteristics, rules and guidelines for the specific areas. The purpose of the 2011 regulation is to ensure that cultural heritage is taken into account at the beginning of the entire planning process, so it is not limited only to protected objects and areas but covers the whole municipality area.

Since the introduction of this principle in land-use plans, the need to designate new BSDGs decreased (Prins et al., 2014). Furthermore, in 2009 it was also decided upon Momo (Modernisering Monumentenzorg) that post-war heritage areas will be designated by directly incorporating them into the national policy framework on spatial planning. This was presented as a new way of working and has been applied to 30 urban as well as rural areas with a history dating from the period 1940-1965 in 2011. Any BSDGs that were designated after the year 2011 were the ones that were already part of the national designation scheme (or "monument selection programme") before that, meaning that their designation or the aim to designate them had been already in progress (Interviewee #3, personal communication, April 3, 2023). The

existing BSDGs, however, are still integrated into the land-use plans along with a description of their cultural-historical values and information on how these zones are taken into account. The extent of information on this depends on each municipality.

5.1.2 Nature of protection in BSDGs

To understand the character of the BSDGs as an instrument, it is vital to understand what are the aspects of an area that lead to listing it as national heritage. At the start of this instrument, areas with a history up to 1850 were considered for designation. In the 1990s, the state started to survey also areas from later periods, specifically 1850-1940. Whereas the selection criteria for the older areas were based on expert judgement and description of the instrument in the Monumentenwet, the designation process of the 1850-1940 areas was based on value (P. Timmer, personal communication, July 6, 2023). These values are of different characters and the RCE (Cultural Heritage Agency of the Netherlands) distinguishes between six separate values: cultural-historical value, historical-spatial value, urbanistic value, situational value, integrity or recognizability, and rarity (RCE, 2012). These values are expressed through physical aspects of the built environment such as landmarks, image-defining buildings, street patterns, building lines, roof shapes, greenery and gardens, public spaces, bridges and sightlines (RCE, 2012).

According to the RCE, these values are underpinned by three core components, which are the underlying recognisable historical characteristics that together create a place. These are 'image', 'structure' and 'function'. In recent years, in the course of developing a deeper understanding of intangible heritage in the heritage field, 'narrative' has been added as a fourth component. However, the concept of narrative has been fully part of the heritage discourse only for the last 30 years since the Nara Convention of 1994. Considering the age of the BSDG instrument and the fact that most of the protected historic areas in the Netherlands were designated before 2000 (see Fig. 12), it can be assumed that, to a large extent, 'narrative' has not been considered as a factor for a designation of a BSDG area. This term can have different meanings to different people and it is quite flexible in its interpretation. According to Walter (2020), a "narrative approach is the claim that a building is meaningful primarily for what it represents as a cultural whole, and only secondarily for its parts, however interesting they may be. The current values-based methodology works in the opposite direction, from part to whole, with significance understood as merely the sum of the separate values identified" (p. 134). This can be seen in the case of the BSDG designation as well since the process is value-based. However, it is possible to identify intangible traits in the other three components (image, structure, function) as well. For example, the 'function' component, such as land use or local economy, could theoretically be also seen as part of the narrative of a site. Moreover, based on Article 5.23 of the Living Environment Quality Regulation, the selection criteria in terms of cultural-historical values for BSDGs also consider the "importance of the area as a special expression of (a) cultural, socio-economic and/or spiritual development(s)" (Overheid, n.d.). However, this is always related to the physical features of the site. Intangible heritage per se, such as traditions and customs, is not included because BSDGs, by definition, consider movable and not immovable property.
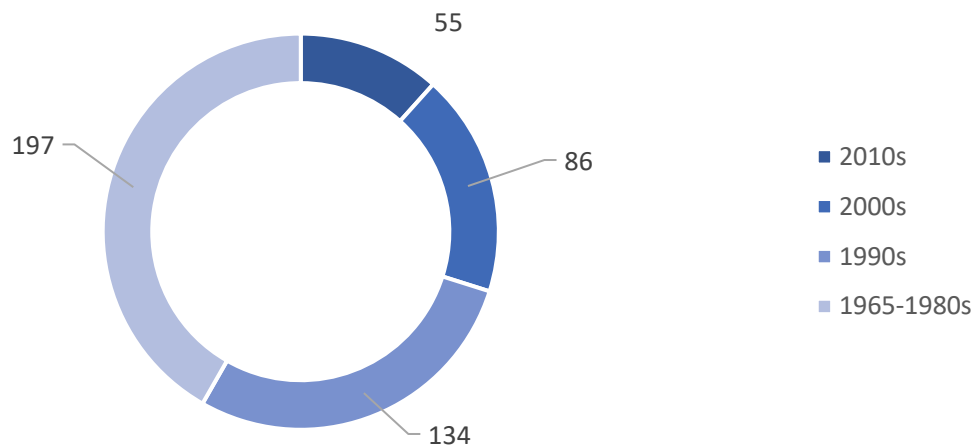
Fig. 12: Number of designated BSDGs since 1965 (*RCE data, accessed through the internship*)

In terms of what is protected, the RCE created six categories of urban environments covered in the BSDG instrument: dense city, green city, buildings ensembles, villages, landscapes and city parks (see Table 8). These categories are based on two main factors: the degree of built density and use. Dense cities and villages are the most designated category, making up more than half of the listed assets (see Fig. 13). Each designated area is assigned only to one of the six categories. To date, there are 185 areas defined as a 'village', 148 as a 'dense city', 59 as a 'building ensemble', 26 as a 'green city/town', 50 as a 'landscape' and 4 as a 'city park'.

Table 8

Types of BSDG and their definitions (RCE data, accessed through the internship)	
Dense city	Built-up areas with high density and multifunctional use.
Green city	Built-up area with a certain degree of density and multifunctional use and large green structures in an urban context.
Building ensemble	Built-up area with a certain degree of density and predominating mono-functional use.
Village	Built-up area with moderate density and multifunctional use.
Landscape	Low-density rural structures.
City park	The city park as a designed unit. City parks as part of a larger area and/or structure fall within the category 'The green city'.
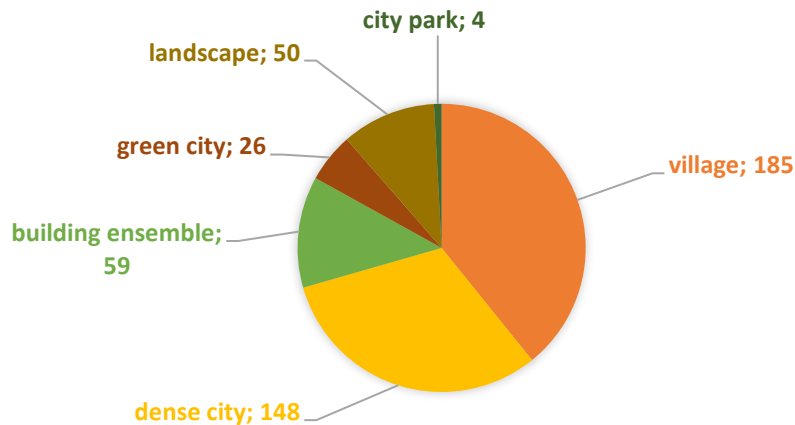
Fig. 13: Types of BSDGs (RCE data, accessed through the internship)

5.1.3 Nature of development in BSDGs

The character of protection of BSDGs imposes certain conditions regarding development in the designated areas. However, that does not mean that the instrument opposes all kinds of development. The BSDG instrument was indeed originally intended as a protection measure but also as a regulation of unsuitable development. As the explanatory memorandum to the Monument Act from 1961 states, "it is by no means the intention to "freeze" such town and villages in the state in which they are" and the aim must be to ensure that any changes that are desirable or necessary are only made in such a way that the aspect of the whole, or at least as little as possible, is not damaged (RCE, 2012, p. 5).

As previously stated, zoning provides protection for these areas, but it also ensures that their existence is taken into consideration in spatial development in the area. The designation of areas comes along with a number of rules and constraints which are reflected in the land-use plans. Although each BSDG has its own land-use plan and rules, there are rules that apply in general. Additionally, there is also a "welfare policy" through which the municipality can impose aesthetics criteria in certain areas. The land-use plan and welfare policy are completed by the permit system with the aim of controlling development in the areas. Permits need to be obtained in case of demolition, renovations, expansion and new constructions. In the case of demolitions, the environmental permits have such an advantage that they prevent parcels from remaining vacant since these permits might be withheld if no environmental permit was granted for the replacement structure (RCE, 2012). The plans for new buildings need to be assessed by responsible departments and an independent heritage or spatial quality committee within a municipality. This also applies to new buildings in a non-protected area, but there are fewer restrictions. In the case of new construction, municipalities can have additional requirements, for example in terms of aesthetics. Therefore, it is always imperative to get in contact with the relevant municipality office since the requirements for the protected areas can differ.

What activities require a permit or are permit-free depends on the relevant land-use plan and the General Provision Act Wabo (Wet algemene bepalingen omgevingsrecht). Generally, minor changes to the rear facades and rear roof surfaces usually do not require a permit. An example of a permit-free structure is a garden shed located at the rear of a house. However, this exemption only applies if the yard is not facing a publicly accessible area (e.g., a public park) (Olsthoorn, 2019). This is also true for indoor changes which are permit-free, provided that the building itself is not a national or a municipal monument and the supporting structure remains untouched. Necessary repairs, such as replacing a few bad roof tiles, are also permit-free. However, for example in the case of Arnhem, renewing the entire roof is again not allowed (Gemeente Arnhem, n.d.).

Specific details of how development can proceed can differ from case to case, and it is up to each municipality how they steer this development. The characteristics of a BSDG often play a role in urban design plans, landscape plans, water management plans and visions of the future of a city or the entire municipality (P. Timmer, personal communication, July 6, 2023). In some cases, municipalities create guidelines to support the goal of the BSDG. For example, the municipality of Rotterdam published a 50-page guide in 2018 providing the residents of the protected areas with very detailed directions for their nine nationally protected townscapes (Gemeente Rotterdam, 2018). Generally, the municipality of Rotterdam aims for getting "closer to the original appearance and qualities of an area" so that "it can become even more beautiful" (Gemeente Rotterdam, 2018, p. 8). In this case, the layout, colours and materials play a major role in this task.

5.1.4 Governance and participation in BSDGs

The processes accompanying the BSDGs, from their identification and designation to their management, are steered by national expert committees as well as provincial and municipal governments. Designation is part of a democratic process where the municipality agrees to the designation of a certain area given that local people do not oppose it (P. Timmer, personal communication, July 6, 2023). Participation is imposed by the 'Algemene wet bestuursrecht' which currently creates the legal framework for mandatory participation in the Netherlands. It concerns participation in the sense of providing information, as the law states that administrative bodies are obliged to inform the public about decisions. Based on this announcement, members of the public can object to a decision or support it. For example, in the process of designation of the beschermde stadsgezicht 'Plan Zuid' in Amsterdam, which was designated in 2017, the Amsterdam municipality received a lot of support for the intention to list the area from its residents, who were bothered by the frequent development activities in the area (A. van Dijk, personal communication, May 2, 2023).

The governance around the BSDGs will be affected by the new Environmental Act. Although it is not in force yet, it is important to shortly elaborate on this anticipated change as it will have implications for the processes within BSDGs. The Cultural Heritage Agency of the Netherlands (RCE) participated in the creation of this act. The new Environmental Act will put a large emphasis on participation and promotes participation in the early stages of a project or an activity. The new act requires obligatory participation in processes in environmental vision (omgevingsvisie), environmental plan (omgevingsplan), project decision (projectbesluit), environmental permit (omgevingsvergunning), programmes, environmental regulation (omgevingsverordening) and water board regulation (waterschapsverordening). In creating

these documents and reaching decisions, the administrative body needs to state how the public and other organisations were involved in the preparation and the results that this brought. In the case of an environmental permit, which will also concern the BSDGs, the applicant must state if there was a process of participation. In other words, it is not required for the applicant to collect other opinions on the project, however, it is encouraged (Interviewee #2, personal communication, March 27, 2023). Even if it would be indicated that there was no participation, the relevant authority is still obliged to process the application (Informatiepunt Leefomgeving, n.d.). There is no form pre-defined for the process of participation in the law and it is up to the authority to decide whether the participation process is sufficient. What this demonstrates is that participation processes for heritage and BSDGs won't be specifically legally bound in the near future.

5.1.5 Existing participatory initiatives

Despite the lack of guidelines for participatory practices in protected areas in the Netherlands, there are examples of top-down approaches supporting community participation as well as bottom-up initiatives.

The top-down approaches are initiated by the local governments and usually strive to inform the population about their policy processes and heritage development vision (e.g., Elburg and Laag-Soeren), or encourage some sort of action by the public. In recent years, the energy transition has also been an important topic within conservation and heritage which further increased the need for including the public in integrating renewable energy systems in historic environments. For example, Dutch cities like Doesburg, Haarlem and Amsterdam ran surveys and campaigns to enable the positioning of solar panels in protected areas (Gelders Genootschap, 2021; Gemeente Haarlem, 2021; Federatie Ruimtelijke Kwaliteit, 2022).

There are also long-established organisations which focus on the revitalization of individual architectural sites. The "Stadsherstel" organisations have a long tradition in the Netherlands. The approach emerged from the grassroots as a public-private partnership before the Second World War (Timmer, 2014). Most of these organisations were created in the 1970s when historic districts across the Netherlands were dilapidated and in threat of demolition, which led to opposition and subsequent action from residents and Dutch intellectuals (Timmer, 2014). These organisations purchase and subsequently restore and lease heritage buildings. Some Stadsherstels work locally and some focus on entire provinces. These organisations enable the broader public to participate through donations and volunteering programmes and also organise cultural events.

Bottom-up initiatives mostly include associations ('vereeiniging') and foundations ('stichting'), which were originally formed with the aim of delivering a project or a heritage development vision for their area. For example, the villages Gortel and Nielsen joined forces and created an association to put together a neighbourhood vision using the landscape biography approach which emphasizes the connection between people, the landscape and its various historical and social layers (see Kolen and Renes, 2015). In the protected area of Witte Dorp in Eindhoven, a group of residents created a neighbourhood association which actively contributes to the preservation of the BSDG and strengthens the sense of community in the neighbourhood.

5.1.6 Case study: Dorpsontwikkelingsmaatschappij in Ee, Friesland

One of the prominent examples of an initiative that support collaboration among multiple sectors and participation of a local community is the Dorpsontwikkelingsmaatschappij (Village Development Company) in the Frisian village of Ee (Ie in Frisian). The Dorpsontwikkelingsmaatschappij, further as the DOM, emerged with the goal of the improvement of the historic built environment in rural areas in the Province of Friesland. The DOM was a partnership between the former municipality of Dongeradeel, the Province of Friesland and four villages: Ee, Paesens-Moddergat, Holwerd and Metslawier. The Dongeradeel municipality merged with other smaller municipalities to form Noardeast-Fryslân in 2019. The DOM partnership programme ran from 2012 until 2019 which means that the programme ran under a different local government than the current one. All four villages have a historic village core protected under the BSDG instrument as 'beschermd dorpsgezicht' (protected villagescape). This case study focuses on the village of Ee.

Fig. 14: Ee village in the past (Van den Berg, 2983, pp. 310-311) and in 2023

Ee is a village of 850 inhabitants and takes pride in having the shortest name in the Netherlands (Interviewee #8, personal communication, June 21, 2023). Ee has a historic village core which was designated as a beschermd dorpsgezicht in 1990. As the designation document states, Ee's historic core was listed for its high quality of historical-spatial structure, the village image, a coherent structure with the church at its core, a connected built-up street pattern and a recognition of historical development (RDMZ, 1990). A photo comparison (see Fig. 14) shows that the village still exhibits the unique historical character as it did several decades ago and it still maintains the qualities for which it was designated.

Before the start of the DOM project, Ee was dealing with population shrinkage. As Ee's village vision from 2012 states, "Over the past 10 years, the population of Ee has decreased by 15%, from 1000 inhabitants to 850 inhabitants. A clear shrinkage that does not benefit the quality of life in Ee" (Vereeniging Dorpsbelang Ee, 2012, p. 1). Moreover, the village was dealing with deterioration of the built environment as well. As the members of the former DOM team in Ee shared via written communication: "there were neglected buildings, especially within the boundaries of the protected village core" (Interviewees #9 and #10, personal communication, June 7, 20203). Ee was not the only village dealing with these challenges. The other three villages - Paesens-Moddergat, Holwerd, and Metslawier - were also facing population shrinkage and physical deterioration. That is why the Frisian Province, the Municipality of Dongeradeel and the four villages jointly set up an experiment with the aim of tackling these challenges and strengthening the living environment in the villages. At the heart of this experiment was the creation of a team of motivated residents in each village who would actively contribute to and decide on the regeneration of their historic environment.

Project governance:

The governance of the DOM partnership was based on the premise that all parties should be equal participants in discussions and decision-making processes. However, the main objective was to allow the villagers to be the ones to come up with ideas and solutions and implement them. According to Sjoerd Hoekstra (personal communication, May 8, 2023), a DOM program manager, there is often untapped potential among the villagers: "The people often have ideas about their village but do not get them realized because they do not have an entry point into the municipality". Therefore, there was a need to empower the village residents and create a connection with the municipality.

For this reason, a local DOM team composed of motivated residents was formed in Ee as well as in the other villages. The local DOM creates one of the three components of a DOM partnership (see Fig. 15). Another partner was the municipality. On the municipality level, there was the municipal DOM team which functioned as a sort of umbrella for the local DOMs. The municipal DOM team was composed of local DOM team chairs from Ee, Paesens-Moddergat, Holwerd, and Metslawier and municipal government directors from Dongeradeel. The local DOM-teams were run by five volunteers in each village and were ideally composed of men and women of diverse backgrounds, knowledge and expertise (Interviewees #9 and #10, personal communication, June 7, 2023). The third component of the DOM partnership was the 'DOM-denker', also called an independent connector. The DOM-denker is a person who is independent from both the village and the municipality and helps both parties to listen and understand each other. The partners and their tasks are summarised in Table 9.

Thus, the residents were involved throughout the whole process, from identifying the goals to the implementation of plans. At the beginning of the project in 2012, the DOM-team and the residents co-created a vision for the future of Ee called the Dorpsverkenning (Village Exploration). This document in combination with building-historical and cultural-historical analysis conducted by RCE (Cultural Heritage Agency) created a Development Plan for the village. The residents' overall vision for the village was to raise awareness of the Ee as the "Flax village" (Vlasdorp) across the Netherlands. In other words, it was to strengthen the identity of the village as the place where the processing of flax into linen is an old craft and part of the identity of the villagers. The Dorpsverkenning set out four aims: 1) to make residents and
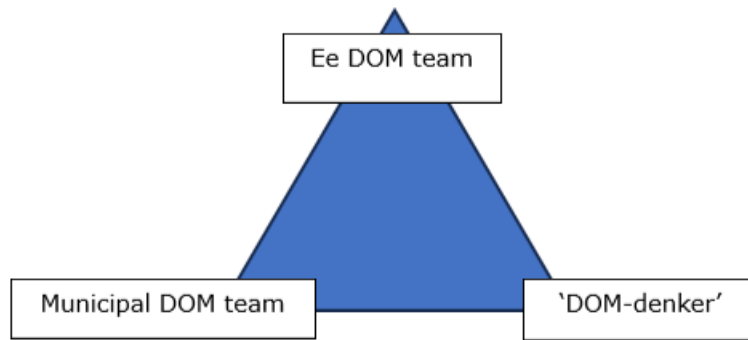
Fig. 15: Governance structure of DOM in Ee

businesses stay in Ee, 2) to attract new residents, 3) to boost tourism, and 4) to support youth activities and encounters. The document also states how this will be achieved, as the residents came up with three possible ways: a) the preservation of heritage, b) development, and c) marketing Ee's unique character.

The residents were encouraged to identify problems and come up with a solution. As two members from the former DOM team in Ee shared, "all realized projects originated as ideas from the village community" (Interviewees #9 and #10, June 7, 2023). There were monthly meetings with the municipal DOM team and the representatives from the other three local DOM teams. In these meetings, projects were discussed and approved. After the approval, necessary funding would be made available. Finally, the residents that submitted the application would be responsible for the implementation of their idea. The budget for the DOM scheme was made available by the municipality and the province. Four different funding types were set up which focused on the maintenance of the private housing stock, larger changes to the private housing stock, public projects and a so-called opportunity pot which was intended for other types of interventions and social activities.

Table 9

Actors in Dorpsontwikkelingsmaatschappij programme in Ee		
Sector	Partners	Tasks
Public sector	Municipality of Dongeradeel Province of Friesland	Funding, policy and strategy
Private sector	Independent connector	Linking all actors, communication
Civil society	Local DOM team Dorpsbelang (village board) Village residents	Creation of plans and their implementation of plans

Project results and challenges:

In Ee, citizens were empowered through the establishment of the local DOM team, resulting in the maintenance of private property, knowledge-sharing among the team and citizens, and further protection of cultural-historical, and architectural values. The funding provided by the DOM allowed for an improvement in the building stock within the protected area. This encouraged residents to undertake repairs and renovations on their houses. Moreover, the DOM initiative enabled the protection not only of the physical fabric of the area, which was the initial intention of the funding scheme, but also of intangible heritage in the form of stories and local history.

One of such projects that promoted tangible and intangible heritage of Ee was the Waddentour project. The goal of this project was to raise awareness of the village and its history (Redactie RTVNOF, 2016). For the Waddentour, there was intensive cooperation because it was a joint project among all four villages. The former members of Ee's DOM team remembered the process of it: "It was not easy as motivations [of the individual village representatives] sometimes differ". Nevertheless, the Waddentour was successfully developed together and implemented in each village. In Ee, multiple signs were put up throughout the village presenting snapshots of the past along with stories of the locals who used to live there (see Fig. 16). The signage ca be followed also with a smartphone app and on a website. This project brought an economic boost to the village and also regional tourism (Interviewees #9 and #10, personal communication, June 7, 2023). As the members of the former DOM team see it, the Waddentour has put Ee on the map: "Buses full of people from governments passed by and through the villages, as well as many walkers and cyclists". While this is a small intervention, smaller than a house renovation or creating a public square, it provides the built fabric with social context – a human story.

Another project which aimed to promote local identity was the renovation and re-opening of Ee's Flaxmuseum. The museum is in a part of a historic building right next to the church in Ee containing a small room with artefacts and posters telling the visitors about the history of flax produce in Ee. Part of the exhibition is also a recording of a local resident who tells the visitors about this part of Ee's history. The museum is open every day of the year and is run by volunteers.

The flip side of tourism development is the pressure on the housing market in the Ee from people who want to buy houses within or close to the historic village and rent them out for short stays. According to the former president of the DOM team in Ee, this trend needs to be actively managed so that the village remains a place where people live and does not become just a holiday destination (Interviewee #8, personal communication, June 21, 2023). Further ways how participation supported the development of the area was the creation of the development vision in the beginning, which was co-created with residents. The vision set out goals in the form of small interventions, such as putting up better signage throughout the village, and improving the greenery, but also bigger targets such as a public square, realized in 2019. Another example of a public space intervention was a project focusing on a local cemetery where a group of residents received funding to make it a barrier-free environment. These repairs throughout the village have also contributed to the visual improvement of public spaces.

Setting up the DOM, creating a development vision and making this vision a reality also had a great impact on the social structure in the village and on community empowerment. In general, the residents of Ee seem to be proud of their beschermd dorpsgezicht as multiple signs along the streets in the village point to the beschermd dorpsgezicht. Even at the beginning of the DOM programme, one of the members of the Ee's village board wrote: "[When looking at a picture of Ee I saw] the beauty, the uniqueness of our village of Ee. A feeling of pride came inside of me: yes, that's where I live!" (Vereeniging Dorpsbelang Ee, 2012, p. 1). Equally, former DOM's president in Ee shared his motivation for volunteering his time for the village: "I enjoy living in EE very much. A lot is happening and I have to help". Despite this, however, the village community was not particularly cohesive before the start of the DOM and any wishes for interventions in the village were hoped to be done by the municipality, as the interviewee

Fig. 16: Waddentour sign showing a photo of the time when Ee had a harbour

pointed out. According to interviewees from the former DOM team in Ee, the biggest challenge in the beginning was to take action together with the municipality and find support in the village: "Ee was not known as the most active or progressive village", they shared. Despite these pessimistic suppositions, the village managed to find a group of young people in the village to form the DOM team. The members of the former DOM team shared that they worked a lot on reaching the people within the village community: "The DOM team has paid much attention to internal communication with Ee residents. Many forms have been used: social media, village newspaper De Jister, website, information meetings, open days, etc". Through the local DOM team's efforts, people in Ee got to know each other better. Moreover, these changes inspired residents within the village. As Saapke Nijhuis and Wieke Kooistra from the Noardeast-Fryslân Municipality reported: "If one person starts an initiative, it is contagious and others start it too" (S.Nijhuis and W. Kooistra, personal communication, May 24, 2023). They provided an example of how the first steps in public space and around the church led to an improvement of privately owned properties for example in the form of garden maintenance or a new coat of paint on the houses.

The short lines of communication between the different levels were highly valued by multiple interviewees (S. Hoekstra, personal communication, May 8, 2023; Interviewee #8, personal communication, June 21, 2023; W. Kooistra and S. Nijhuis, May 24, 2023). As the two members of Ee's DOM team shared, it was about creating a close relationship between the village and the municipality of Dongeradeel: "Those two worlds, village and municipality, got to know each other. All those involved were easily approachable on both sides". Breaking down the communication boundary was crucial: "We learned to speak each other's language and there was a respect for each other's roles and positions". According to the DOM programme manager Sjoerd Hoekstra, having the municipality "at the table right at the start of the DOM" was crucial for the success of this scheme. In his view, "it only works when a municipality is open to the plans from the villages and arranges internal capacity to take these plans further". Hoekstra admitted that it needs a lot of energy and time at the beginning of a project like the DOM in Ee. However, he saw the positive outcome of this effort: "the investment pays off in terms of support and the quality of plans and initiatives". Hoekstra also saw that good communication can be of crucial importance when trying to develop an area with a heritage status and national monuments: "Although a protection status is a challenge, in conversation with each other, people come out of it and as a result, people think in terms of opportunities". Hoekstra commented on how the programme can help in understanding the value of the historic environment: "People can also understand the quality of buildings with a protected status and see their value for the village".

The DOM scheme was not renewed in its initial form after Dongeradeel was merged with other municipalities into Noardeast-Fryslân in 2019. The absence of close contact with the new municipality government is a source of frustration for many in the village. The members of Ee's DOM team see the lack of cooperation from the municipality as a major limitation in solving the current problems in the village after the end of the DOM program: "The biggest challenge in 2023 [for Ee] is the energy transition for the buildings and homes within the protected village core. Solutions are being sought but not found together with the municipality". The problem around energy transition arises due to the fact that the municipality of Noardeast-Fryslân prohibits the installation of solar panels on rooftops in the protected core of Ee for aesthetics reasons. That poses a major problem for the village because it cannot move forward with its intention to use more renewable energy to achieve its sustainability goals. According to the interviewees from Ee's DOM team, cooperation with the municipality is crucial and without it, people in the village will not be motivated to follow the municipality's guidelines: "If the municipality keeps coming up with answers like 'can't, can't', then the dissatisfaction arises and that can lead to disobedience among residents".

However, despite the end of the DOM in the village, the method and experience stayed with the residents. "It is in our DNA now", as the former president of Ee's DOM said. Throughout the years of working with the DOM, the village learned about how to improve their living environment through active engagement, communication and co-creative processes. The Ee's village board and the village residents have also acquired new skills in terms of financing projects and related administration. As the former president reported, the funding opportunities from the DOM experiment were very important and served mostly as initial financial support: "It was often start-up capital to find more financial sources and funds. Gradually the villages learned this [how to find and apply for funding] from each other, the municipality and the provinces. Money can often be found for good plans". The interviewee added that "those experiences continued in Ee and are still being used and learned by new people".

The village board (the Dorpsbelang) as well as the village residents keep on working with the DOM mindset. The members of the former Ee DOM team see this very positively and hope that Ee's Dorpsbelang and its residents will continue on the path that DOM has introduced, despite the lack of cooperation with the municipality. In the view of the former DOM team members, "the village is strong enough to continue on its chosen pat" as "new plans and ideas are still being worked on with great pleasure and new people" (Interviewee #9 and #10, June 7, 2023). For instance, there is a new programme started by the Dorpsbelang after the DOM ended. The new programme "Ienergy", combining the word 'energy' with the Frisian name of the village, is a programme that aims to facilitate energy transition in the village. This initiative emerged with the DOM mindset, hoping to tackle the future challenges in this dynamic and determined Frisian village.

5.2   Conservation areas (England)

In England, conservation areas were introduced in the Civic Amenities Act 1967 and since then they have been included in various legal documents. Section 69 of the Planning Act (Listed Building and Conservation Areas) of 1990 defines conservation areas as "areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance". The Act sets out duties for municipalities in terms of 'preservation' or 'enhancement' of a conservation area. As paragraph 72 states in the context of planning in conservation areas, "In the exercise, with respect to any buildings or other land in a conservation area […] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area". Compared to the Dutch case, there is no age cap on the designation of a conservation area and therefore also post-war areas or estates from the 1990s can be designated based on a decision of local authority. Technically, any area can become a conservation area, but it is essential that its cultural-historical values can be justified. Currently, Historic England considers the age of 30 years and older as a good age limit to consider a heritage asset for designation (Interviewee #11 and #12, personal communication, May 23, 2023). To date, the list of conservation areas counts more than 10 000.

5.2.1 The English System of heritage and planning

Within the United Kingdom, England, Northern Ireland, Scotland and Wales have their own legislature on heritage and planning. Within this context, the English planning system is discretionary. In comparison to the regulatory system, which is based on regulations imposed through a land-use plan, this system is based on planning applications and permissions. In the English system, this is perceived to enable larger flexibility in decision-making processes because the law does not prescribe many rules and negotiations are needed to reach a decision (Kormoczi, 2022).

The historic environment in England is regulated by four legal documents: the Town and Country Planning Act 1990, the Planning (Listed Buildings and Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979 and the Protection of Wrecks Act 1973. Any decisions relating to conservation areas and listed buildings must adhere to the Planning (Listed Buildings and Conservation Areas) Act 1990 and the policies within the National Planning Policy Framework (NPPF) and the Local Plan. The NPPF introduced a new planning policy regime in 2012 and a new version was published in 2018. In 2010, the shift away from the government towards a larger focus on the local level led to the removal of regional governments and an enhancement of a centralised system (Veldpaus et al., 2019). Therefore, there are currently no policies at the regional level.

The national level, represented by the UK government, has the responsibility of allocating funds to local authorities and preparing the NPPF for England (OECD, 2017). Local authorities are responsible for local planning (OECD, 2017) and for designating a conservation area. Conservation areas are the only heritage assets in England that are designated by local authorities, as Historic England is responsible for the listing of other heritage assets. Historic England is a non-departmental public body and a government agency, which is sponsored by the Department for Culture, Media and Sport and acts as an advisor in heritage matters to the government. Historic England is responsible for recommending sites for designation, providing advice and maintaining the National Heritage List for England. The Town and Country Planning

(Development Management Procedure) (England) 2015 sets out an obligation for local planning authorities to consult Historic England in case planning applications concerning listed heritage assets. Historic England is funded by the government and partly from the services they provide, and the organisation itself runs multiple grant schemes for the historic environment. The Heritage Lottery Fund is another non-departmental public body which works across the entire UK and is an important actor related to the funding of heritage.

5.2.2 Nature of protection in conservation areas

In England, the designation serves the purpose of protecting and recognising all the special character-defining aspects in planning decisions. However, Historic England also states that "designation is undertaken […] in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest" (2019, p. 5). This shows that within this instrument, the element of neglect and threat can be one of the incentives for having the area designated.

Prior to designation, three aspects need to be considered in this context (Historic England, 2019). First, the local authority needs to consider whether the character of the area can be seen as 'special'. Secondly, it should be clear how this can be experienced, so also the local body needs to decide what parts of the environment help deliver this experience. Thirdly, the local authority needs to consider whether the status could help to solve problems the area is facing. Identification of areas suitable for designation can stem from research into areas, but also from local communities working on a 'Neighbourhood Plan' (see Chapter 5.2.4). In these plans, people can identify non-designated assets which hold value for them. Suitability for designation as a conservation area depends on at least five aspects (Historic England, 2019). First, the area abounds in already designated heritage assets along with having a variety of architectural styles. Second, the areas are linked to a certain individual, industry, custom or pastime that is of local interest. Third, the historical layout is still visible in the modern pattern. Fourth, there is one architectural style or a specific material that predominates in the area. Finally, the public realm or a spatial element is of high quality in terms of design, settlement patterns, green spaces, parks etc. Once an area is designated, the local authority is obliged to review this designation 'from time to time' to see if the conservation area should be extended, other areas added or if the area should remain designated at all. According to Historic England, the ideal timeframe is a review every five years (Historic England, 2019).

Conservation areas can be in villages as well as cities. There are different types of heritage assets designated as conservation areas, such as historic centres, fishing and mining villages, suburbs (18th/19th/20th century), model housing estates including those from the late 20th century, country houses in historic parks, historic infrastructure (canals, railways, airfields) and industrial heritage sites (Historic England, n.d.). The 'special character' of these areas is created through the buildings, street layout and other boundaries and characteristic materials (Historic England, n.d.). A toolkit which was produced by Oxford City Council and funded by Historic England can help with understanding the character of historic areas, their use as well as physical appearance, relating to five aspects: spaces, buildings, landscape, views and ambience (see Table 10)

Table 10

Components of character of historic areas (Oxford City Council, n.d., pp. 5-8)	
Spaces	A 'space' is normally the gap between buildings and other features. They may be formally designed or develop informally over time. They may be enclosed by surrounding buildings, trees and foliage, have structure created by the alignment and spacing of surrounding buildings or property boundaries, and be narrow or wide and open. The character of areas can depend on their uses and vibrancy, as well as the choice of paving, kerbs, seating, telephone or post boxes or the presence of formal planting or other greenery.
Buildings	Do buildings make an important contribution to the character of the area and if so, what features are significant to their contribution? Do buildings reflect an important period in the area's history and is this reflected in their past or current use? Do buildings share a uniform scale and size, or is there a high degree of variation that is visually attractive? Are the buildings very old or do they form a single development with shared or similar architectural detailing? Do styles of windows, doors or other features add to the visual interest of the buildings, reflect their origins and use, or form part of a designed scheme? What condition are the buildings in? Have changes increased or reduced their interest, or have they lost important features?
Views	Are there views of interest and distinction? Is a view well known because of a historical event, painting, prose or poetry, or is it popular with local residents as a part of a public place? Are views glimpsed through gaps between buildings, channelled by lines of trees or buildings, or open and expansive? Does the shape of a street create a series of views, or is a single viewing point particularly important? What features of the view contribute to its interest? Does a landmark, such as a building or group of trees, form a focal point? Does the view include an attractive frontage or roofscape? Is the view urban or rural in character? Do background features like the city's rural setting contribute to the view's attractiveness?
Landscape	What landscape features contribute to the area's character and how do they affect it? Do hedgerows or grass verges create a rural feel or do street trees provide a leafy suburban character. What hard surfaces are present, are they attractively designed or do they use materials that are out of keeping with the area? Does their maintenance affect their contribution? Is a river of canal a significant feature in the area? Does it have scenic or wildlife value?
Ambience	Many less tangible features, such as activity, changes in light during the day, shadows and reflections affect reaction to an area. How does the area change between day and night? Do dark corners or alleyways feel unsafe at night time? What smells and noises are you aware of and is the area busy or tranquil? What affect, if any, does vehicle traffic have on character?

5.2.3 Nature of development in conservation areas

In England, using heritage as a development tool has been a common practice for several decades (Veldpaus et al., 2019). The National Planning Policy Framework (NPPF) requires conservation areas to be given great weight in the process of issuing planning permission for developments. This framework also states that "Local planning authorities should look for opportunities for new development within Conservation Areas […] to enhance or better reveal their significance" (article 206, p. 58). The NPPF also states the obligation of local authorities to make local development plans which include the future development of the conservation area along with other areas.

The English do not use a regulatory system (like the Dutch) but a discretionary system. In this system, decisions are not made on the basis of a land-use plan, but on the basis of a planning policy, and decision-making is left to the judgement of the administrators. The integration of heritage is, therefore, achieved differently. The English do not regulate land use through land-use plans, but with so-called "Local Plans". A local plan is a framework for development prepared by all municipalities in England. The aim of these plans is to create a 15-year vision for the future of a municipal area. The Local Plan describes a vision and a framework for the future development of an area (OECD, 2017). Part of a Local Plan, there are also so-called 'Core Strategies' which function as the main local land-use plan drawn in 1:2500 or 1:200 accompanied by a section on general policy guidelines (Schulze Bäing & Webb, 2020). Conservation areas must be included in these local plans (Veldpaus et al., 2019). These plans should include a strategy for preserving or enhancing the character and appearance of these areas if planning decisions are to affect them (Historic England, 2019). According to Historic England, such a strategy should cover points such as protection of important views, demolition and replacement of buildings, support for applications that aim for viable reuse, an urban design strategy to secure good design quality in new development, or criteria for retail and other uses to protect the character of the historic environment.

If there are changes to be made in conservation areas, planning permissions are required. Generally, the rule applies that developments which affect the external appearance of buildings and the visual experience of the place are excluded from permit-free activities. Activities in need of a permit are, for example, the demolition of gates, fences or walls which are next to publicly accessible areas, house extensions and cladding of the outside of the property with specific materials. The local authorities decide about granting permissions and they need to consider if the planned intervention preserves and/or enhances the special character of the area. During these processes, great detail is paid to the scale, materials, form and other design aspects to make sure it fits within its environment (Greater Cambridge Shared Planning, n.d.). Further additions to the buildings such as solar panels, insulation, antennas and house extensions require permission. The same applies to the replacement of windows and doors. Small outbuildings and temporary structures are permit free in case they follow certain rules such as the area of cover, their size and where on the property they are. The NPPF encourages local planning authorities to develop guidelines on the controls, limitations and opportunities for the development of conservation areas and also specific issues in terms of design such as replacement of windows and doors, maintenance and repairs, extensions, design of shop fronts, positioning of solar panels and so on (Historic England, 2019).

5.2.4 Governance and participation in conservation areas

In 2011, the Localism Act introduced an obligation to include a certain degree of participation through the notion of 'Duty to Cooperate' (OECD, 2017) which is a legal obligation for the local planning authorities, county councils and public bodies to actively engage with each other in strategic planning matters. This act also introduced a unique approach to participation at the neighbourhood level: the so-called 'Neighbourhood Plans'. These plans can be created by self-organising neighbourhood communities known as 'Neighbourhood Forums'. These forums do not have the authority to override decisions made in a Local Plan, but they can designate additional land for development. The Neighbourhood Plan also must conform with the NPPF (OECD, 2017). In terms of heritage, these groups can identify non-designated heritage assets

in their area and include them in the plan. In such cases, these groups work with the Local Planning Authority to ensure a high-quality outcome.

When it comes to the process prior to designation, there is no obligation of involving the public in this process. However, it is recommended by Historic England to go through local consultation to ensure public support for the process of implementation of the necessary policies. The Planning (Listed Buildings and Conservation Areas) Act 1990 requires local authorities to publish the intention to designate an area in the London Gazette and a local newspaper (section 70 (8)). Proposals for preservation and/or development of the conservation areas need to be made available at a 'public meeting' where different stakeholders can consider it and potentially raise concerns. This is believed to have benefits for wider support of the proposal as it can avoid a misunderstanding of the measures by the public (Historic England, 2019). This meeting should also ensure integration with other policies for the given area. Some conservation areas might be subjected to further control regarding small alterations, such as repainting house elements with new colours, changes to the roofing material and appearance, and even placement of satellite dishes, which can be prohibited.

Historic England and their partnership schemes are one of the ways of financing repair and maintenance in conservation areas. The Act from 1990 also refers to grants from local planning authorities in sections 57 and 58. Furthermore, funding can come from the Heritage Lottery Fund through the Townscape Heritage Initiative Scheme. Historic England encourages the processes of creating an area appraisal to include communities to obtain information, which would later be a resource for decision-making or neighbourhood-planning use (Historic England, 2019).

5.2.5 Existing participatory initiatives

As in the Dutch case, action within the English conservation areas can be initiated in a top-down or a bottom-up manner. England has a long tradition of involving the private sector and civil society in the conservation of national heritage (Macdonald and Cheong, 2014). The revitalization of the Lace Market area in Nottingham or the Grainger Towne in Newcastle upon Tyne are examples where partnerships between local governments, the private sector and civil society, delivered the repair of historic buildings and boosted economic development (Macdonald and Cheong, 2014).

Building Preservation Trusts (BPTs) are a common civil society tool in the conservation sector in England and the rest of the UK, mostly in relation to heritage assets that are labelled as 'at risk' (Macdonald and Cheong, 2014). Based on specific cases, the BPTs can decide to what extent they will involve the public and how the public's input informs further endeavours of the BPT organisations. Non-profit organisations, such as the Prince's Regeneration Trust, also play an important part in heritage regeneration all across the UK as they enter into partnerships with the private sector and can ensure the future of deteriorated heritage sites.

Historic England runs multiple programmes which aim for public participation. Many of their projects focus on research and including communities in the process. For example, Historic England's scheme known as the 'Missing Pieces Project' invites anyone who would like to contribute to share a picture or a story in connection with a designated heritage asset. This aims to broaden the narrative around already designated objects and places. This initiative is important in providing people with a platform to express their views on England's heritage.

Research is a crucial part of supporting potential development of areas because it can inform its future steps. However, it is only a stepping stone for improving areas through heritage by sharing knowledge or highlighting forgotten heritage assets.

5.2.6 Case study: Heritage Action Zone in Sunderland, North East England

An initiative that was launched by Historic England, but with a broader scope and in-depth impact, is the Heritage Action Zone (HAZ) programme. In this scheme, which started in 2017 and ran until 2022, Historic England cooperated with 10 different places (cities as well as villages) in England focusing on their conservation areas and heritage at risk. This programme was initially seen as an experiment. It turned out to be a successful initiative, which led to this scheme being implemented in a number of other places in England starting in 2023 and 2024 (Interviewee #11 and #12, May 23, 2023). The HAZ initiative was introduced by Historic England to address conservation areas that are classified as being 'at risk'. Its aim was to use heritage as a tool to enhance these areas and support their economies. One of the places that applied to be included in this programme was the city of Sunderland

Sunderland is located in the North East England region and has population of almost 350 000 inhabitants. Within the city's boundaries, there are multiple conservation areas. Three of them – the Old Sunderland, the Old Sunderland Riverside and Sunniside, all situated in the area of East End – were part of the Heritage Action Zone (see Fig. 17). In the case of Sunderland, the scheme was built on previous work by the Council and local partners, other investment initiatives and ongoing projects. The HAZ Team was formed to cover multiple sectors "to ensure the cross-cutting socio-economic and historic environment challenges" (Sunderland City Council, 2017, p. 7). This began by creating a Delivery Plan, which set out a five-year programme and identified projects and activities (see Fig. 17) to achieve the aims of the HAZ. The programme was updated throughout the life of HAZ to increase its impact. During that time, other smaller organisations and businesses joined as people became aware of the programme. Funding for this programme was mostly covered by Historic England, Sunderland City Council, Heritage Lottery Fund and the Architectural Heritage Fund.

Fig. 17: Heritage Action Zone in Sunderland and individual projects (Altogether Creative, n.d.)

The delimitation of the HAZ area included three conservation areas in Sunderland. Within this boundary, there are 70 listed building sites as well as more than 150 below-ground heritage assets. These areas are mostly valued for revealing traces of the expansion of Sunderland in the Middle Ages. The city has a rich industrial history which is tied to the identity of Sunderland. However, due to industry relocation to out-of-town business parks and their reorientation, these areas were left economically deprived with several derelict buildings, many of them listed as heritage sites. Moreover, planning interventions into the city's infrastructure resulted in a new traffic ring surrounding the city centre which, as one of the interviewees from Historic England sees it, cut the East End from the rest of the city and left behind a disjointed urban fabric (Interviewee #11, personal communication, May 23, 2023). So, despite the presence of many heritage assets in the area, it is one of the most deprived parts of the city.

Project governance:

As previously stated, the HAZ in Sunderland was built on existing organisations and projects in the city. The governance structure therefore aimed for deepening the networking between already existing organisations and initiatives to support ongoing projects and to define new ones within the boundaries of Sunderland's HAZ. The partnership for this programme was formed between Historic England, Sunderland City Council and other partners (Sunderland Culture, Churches Conservation Trust, Tyne & Wear Building Preservation Trust, Sunderland Heritage Forum). It was based on pooling the partners' resources in terms of knowledge, finance and expertise to enable the regeneration of the East End. These partners, from both the public sector and civil society, together formed the HAZ team (see Fig. 18).
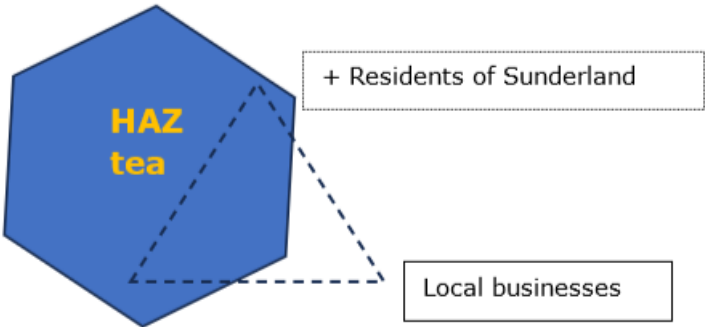
Fig. 18: Governance structure of HAZ in Sunderland

The whole programme was established around a number of pilot projects, spread out across the delimited HAZ area. The local community was not reached through the HAZ initiative directly, but rather through the organisations and various projects that were running under the HAZ framework (see Fig. 18). In fact, the HAZ was initially not set up with community involvement at the forefront. As an adviser from Historic England said in an interview, "It was set up with community involvement included, but not driven by that. It became much more important to delivery as the HAZ progressed" (Interviewee #11, personal communication, May 23, 2023).

The partners involved residents in different ways and different phases of their projects, so there was a large variety of forms in terms of how the local community contributed to the project. Local businesses, such as architecture firms and building companies, were also involved in individual pilot projects. They worked with the HAZ partners to renovate some of the selected listed buildings in the city. Figure 18 shows the relationship between the public and private sectors and civil society. Table 11 summarises the partners and their tasks.

The local community's views were collected through a public perception survey which was conducted for the Historic Area Assessment by Historic England. In this survey, 300 respondents shared their views on the area's heritage and its future. The survey showed that the participants supported the protection and conservation of Sunderland's built heritage and they also expressed a desire for greater community use and involvement. These results, however, are not representative of the majority of people living in the city. The Historic Area Assessment states that: "this survey says nothing about the significance of the built heritage for most people in Sunderland; what it does do is articulate what is significant for those with an interest in the built heritage" (Armstrong, 2018 p. 163).

Table 11

Actors in the Heritage Action Zone programme in Sunderland (Sunderland City Council, 2017)		
Sector	Group or organisation	Tasks
Public sector	Sunderland City Council	Lead overall activity (strategic, policy, maintenance, management)
Private sector	Local businesses	Providing function to renovated premises
Civil society	Historic England	Expertise and support
	Tyne & Wear Building Preservation Trust	Acquisition and restoration of key buildings within the HAZ
	Sunderland Culture	Management and operation of cultural attractions and projects
	Churches Conservation Trust	Redevelopment of Holy Trinity and aligning the project with others in the area
	Sunderland Heritage Forum	Representation of heritage groups in the city
	Sunderland University, Sunderland College, local school, residents of East End and Sunderland	Participation in educative programmes and information events

Project results and challenges:

Sunderland's East End area, also called Old Sunderland, experienced many changes in the past decades, from demolitions and industry relocation to large planning interventions. The heritage of this area, in the form of the physical environment as well as intangible heritage, suffered under these changes. Physical deterioration of heritage assets and a lack of awareness about Old

Sunderland's history were the results that the HAZ initiative strived to solve. The HAZ programme initiated deeper research into the area and managed to update information on five buildings on the National Heritage List, publish a Historic Area Assessment and an aerial photography report. They also tried to raise awareness of Old Sunderland's history by working with local schools and through open-day events.

The HAZ team targeted multiple projects in the three conservation areas. Overall, the initiative delivered renovation and the reuse of 13 deteriorated buildings, which had been left vacant. Among these were, for example, Elephant Tea Rooms, buildings on 170-175 High Street which are now the Pop Recs music venue (see Figs. 19 and 20), Mackie's Corner (see Figs. 21 and 22), the Seventeen Nineteen Church, which was the former Holy Trinity Church and Phoenix Hall, the oldest surviving purpose-built masonic lodge from the 18th century. The buildings at 170-175 High Street were vacant for a long time and in danger of being demolished and now are filled with a café and a music venue called Pop Recs, along with other businesses. The former Holy Trinity Church was renovated to host different types of events, from concerts and cultural fairs to weddings. The renovation of Mackie's Corner was delivered through the collaboration of the developer with the Council, Historic England, an architect firm and independent businesses to bring it back yet again to full use. The research into the building of Mackie's Corner enabled the developers to renovate it respectively to the original architecture of the buildings. However, economic factors were important in the work of the HAZ initiative in Sunderland. As the architect involved in the project said, "We now have Mackie's Corner back how it used to be, which is fantastic. But also, more importantly or equally as importantly, is the fact that it's given it the uses that it needs to guarantee its future" (Invest Sunderland, 2022).

Fig. 19: Pop Recs before renovation (Historic England, n.d.)

Fig. 20: Pop Recs before after renovation (Liebenrood, 2022)

Fig. 21: Mackie's Corner in 1961 (Sunderland, Antiquarians, 1961)

Fig. 22: Mackie's Corner after renovation (Selby, n.d.)

Due to limits on funding and time, the HAZ projects did not target public spaces over the five years it functioned in Sunderland. However, the renovation of individual buildings still had an effect on their immediate surroundings and the East End area. In the case of Pop Recs, according to the adviser from Historic England, the effect on public space was instantly palpable:

> "Pop Recs was a derelict set of buildings in a very prominent location for a generation, for 20 years. Not having to look at dereliction, not having to walk past dereliction automatically is a positive uplift in the neighbourhood. And that affects positive well-being, of course, and it simply is a more attractive environment to be in. The Pop Recs uses the space outside its venue when the venue is in use and so there is great potential for improvements to the public realm around that culture hub." (Interviewee #11, personal communication, May 23, 2023)

In the case of "Mackie's corner", the work on the ground-floor shopfronts inspired other businesses in the area to renovate their shopfronts with their own funding, as reported by one of the Historic England's employees (Interviewee #12, personal communication, May 23, 2023).

Reaching residents proved to be difficult in the beginning. As Loes Veldpaus, who was involved in the Pop Recs project as a researcher working on a life case study, shared: "I found it quite hard to understand how people see their city because, on the one hand, they are really proud of this kind of industrial history. But then, at the same time, there is a lot of pain around that as well because a lot of those industries are diminishing" (L. Veldpaus, personal communication, June 1, 2023). According to Veldpaus, the sense of 'pride' that is usually associated with heritage status was not strong in Sunderland. In Veldpaus' eyes, this is also due to the physical deterioration of the built environment: "there are some really nice buildings in the city centre, but because it is so deprived, it is generally quite complicated for people to feel proud of that".

Tracey Mienie from Church Conservation Trust, who is part of the project Seventeen Nineteen, expressed a similar view on community engagement in Sunderland: "Sunderland is often a place where funding comes in and things are done to the community rather than with the community. As a result of years of that, what we have is a community that will not engage around us" (T. Mienie, personal communication, May 31, 2023). However, Veldpaus and Mienie suggest a possible solution. The Seventeen Nineteen project demonstrated that involving the broader heritage community in the city can enhance the participation of the residents that were not interested in the project in the first place. As Tracey Mienie said, the local community around the church "would not take ownership at first". However, as people from the rest of Sunderland began to hear about the work at Seventeen Nineteen, it had an impact on the local community. Tracey Mienie reported in relation to the local community claiming ownership: "The effect of that is that the local community are saying 'this is our place'". In the case of Pop Recs, it was crucial to create a possibility for people to relate to their local heritage. Loes Veldpaus commented on this: "What is important is that people can relate. That is not to say that people need to learn. […] Lots of people are excluded by the way we talk about those buildings and the stories we tell about them". In this case, it was not so much about enhancing or fabricating a sense of pride in heritage, but about opening heritage up to the community and letting them share their thoughts and stories, and letting them express their narrative. For Veldpaus, it was important to accept that some people will never relate to heritage

in the area: "And that's also alright. It is important to make sure that it is possible to relate to it".

It is also important to state that the period of the programme overlapped with the COVID-19 pandemic in the last two years, 2020 to 2022. Several respondents suggested that the COVID-19 pandemic had a negative impact on projects such as Pop Recs and the Seventeen Nineteen Church as reconstruction works had to be halted. The involvement of East End's residents in these projects was limited as well because the social structure was not strong enough after only three years of the programme to be easily transferred to an online environment, as Veldpaus reported. Another challenge was the novelty of the programme. As the Historic England's adviser argued, it was a new experience for Historic England to do such a large-scale experiment and it naturally came with initial problems in terms of administration and funding, which sometimes left the partners frustrated. However, this was gradually worked out throughout the process and all the participants could learn from it for the rest of the programme as well as for the future.

Despite the difficulty of reaching individual residents in the area and the fact that the HAZ structure was based on a team composed of local organisations and not primarily citizens like in the Dutch case in Ee, the projects strengthened the local community, as the examples the Pop Recs and Seventeen Nineteen show. Loes Veldpaus commented on the effect the HAZ had on the local community: "It's nice for them to feel a connection with buildings in the city they are actually in. It's not necessarily something that would make the building process faster. It's about the engagement and giving people opportunities to connect." Therefore, creating space for the community provides a way to begin making Sunderland's society more cohesive. The process of the HAZ also involved locals through the initial survey which informed about people's views on local heritage. The children were also encouraged to engage with the area's heritage through the Heritage School Programme where they could learn more about the local heritage and obtain skills in heritage research. Another educational facility was approached in the Pop Recs project, when the coordinators partnered with a local college to provide training in conservation skills on the site.

Generally, this partnership managed to strengthen relationships among the different local partners. Tracey Mienie sees the impact the HAZ had on the current network between the partners, noting that: "The legacy of HAZ is that we still meet. It's once every six months to talk about how our projects are going and what the need is". As there are still challenges that this area is facing, continuing collaboration among the HAZ partners is important for the future development of the East End area. Sunderland still battles with challenges, as Historic England's adviser reported: "Fragmentation remains one of the area's biggest problems". Additionally to that, the three conservation areas that made up the HAZ area keep being at risk. However, one of the interviewees could see a positive impact of HAZ in relation to tackling these issues: "The risk is now being better managed and therefore reduced. Now, among decision-makers, local authorities and partners, there is a growing momentum for improvement and change to improve heritage in this part of the city. So clearly the HAZ has had a long-term impact on the improvement of heritage management in these conservation areas" (Interviewee #11, personal communication, May 23, 2023). Thus, The HAZ left a legacy of active change. This could be also observed in December of 2022 when a public meeting took place to produce a conservation management plan to further steer the heritage development as the area still faces many challenges. Since the issues facing Sunderland and the East End are complex, they cannot

be tackled in a short timeframe by a single programme. The HAZ was, however, a stepping stone towards a better future for Sunderland.

6. DISCUSSION

The two case studies show the impact of partnership initiatives and civil society involvement on the protection and development of Dutch and English historic areas. In both cases, partnerships were formed to address physical decline and economic deprivation in these areas. In addition, the aim was the same: to improve the environment by preserving and enhancing their cultural heritage and focusing on public-private relationships and engaging the local community in the form of residents and, in Sunderland, local organisations. The aim of this section is to summarise the key findings presented in the case studies and interpret them in the context of the theoretical framework.

6.1   Protection and Development

The main objective of this research was to explain the impact of public-private partnerships and public participation on the protection and development of heritage protection zones. First and foremost, the Dorpsontwikkelingsmaatschappij in Ee and the Heritage Action Zone in Sunderland show that a participatory approach in the regeneration of historic areas can enhance their protection and development in multiple ways (see Table 12). In terms of protection, both initiatives contributed to the maintenance of architectural heritage and the conservation of its core values. In both cases, a survey of the area was carried out to inform the renovation of the houses and raise awareness of the local heritage amongst its residents, as well as promote it beyond Ee and Sunderland. Providing space for residents to express their views on heritage and their experiences has helped to strengthen local identity and residents' relationship with heritage, whether through a sense of ownership, pride or simply the ability to relate to the historic environment.

Regarding development in the two case studies, participation contributed to spatial, economic and societal development. Spatial development tends to be the most visible one. Ee's citizens co-created a development vision that identified needed interventions in private housing stock and public spaces and led to the implementation of plans created by residents. In Sunderland, the focus was on renovation and the reuse of individual buildings which were spread across the three conservation areas. The visual quality has improved in the area, particularly in Sunderland, and the interventions elevated the general experience of the built environment. In terms of the economic development, Ee's economic strategy focused mainly on marketing the village and raising awareness of its heritage across the Netherlands, which supported further tourism in the area. In contrast, in Sunderland, the refurbishment of historic buildings in the HAZ area was carried out in close collaboration with local businesses to fulfil the economic function of the building, securing their future. Furthermore, both initiatives helped the areas to attract further investment.

In both cases, there was an element of inspiring each other. In Ee, it was among individual residents and local DOM-teams. In Sunderland, it concerned local businesses that carried out maintenance work with their own financial resources. Societal development and community empowerment could also be observed in both areas in different ways. Ee's DOM team managed to strengthen the local community and social cohesion. Even after the end of the programme,

in addition to the municipality withdrawing from the partnership, the people of Ee continue to use what they have learnt during the DOM period and apply DOM thinking to projects in the village. In Sunderland, the HAZ initiative also had an ongoing legacy. The sense of partnership between the HAZ organisations lasts and the local government carries on with taking the area's heritage as a catalyst for change.

Table 12

Ways of participation and PPPs enhancing protection and development in the case studies	
DOM	HAZ
Protection	Protection
• Maintenance of private housing stock • Raising awareness of heritage (beyond Ee) • Sharing knowledge and information (among citizens) • Supporting research • Strengthening a sense of identity and pride	• Maintenance of buildings • Raising awareness of heritage (among citizens in Sunderland and in England) • Review of designations • Supporting research • Strengthening identity, providing space to relate
Development	Development
• Putting together a development vision • Small intervention in public spaces • Inspiring others – chain reaction (individual citizens) • Enhancing tourism in the area • Community empowerment - enhancing social cohesion • Increasing the community's capacities in the long term	• Economic boost for the area • Reuse and renovation of vacant buildings • Inspiring others – chain reaction (businesses) • Improvement of public space through targeting individual buildings in an area • Community empowerment - strengthening a sense of community – providing social infrastructure • Increasing the community's capacities in the long term

Thus, it is evident that pursuing participation can drive positive change, empower communities and have a long-term effect. These examples also show that cultural heritage status need not be the constraint it is generally perceived to be, given the limitations on development within heritage protection zones which are imposed by the designation. Conversely, through an initiative that actively promotes heritage as a vehicle along with participatory processes, heritage status can be an opportunity for development. This opportunity is supported by multiple factors. Firstly, it is due to the fact that heritage sectors generally run multiple funding programmes that municipalities or individuals can apply for. Such funding usually comes with rules which limit its spending. Historic England, for example, can spend its funding only in officially designated areas or in listed monuments. Secondly, there are organisations and heritage enthusiasts who care about local history and architecture and who can be approached to collaborate. Thirdly, heritage and history have the ability to induce a personal connection in

people which makes it more probable that they would like to contribute to the development of something they care about or they can relate to.

Lastly, heritage protection zones are an established term widely known among policymakers as well as residents, and even if these groups may not understand the implications of these zones fully, they are aware of their general function. People are also becoming more aware of the economic benefits that heritage development can bring. The theory of heritage as public good states that heritage needs to be regulated to ensure its equitable distribution and future use. The regulation in this case was listing the areas as heritage protection zones. However, in both cases, such regulation proved to be insufficient. In Sunderland, future use was endangered by a lack of maintenance on buildings that were in a conservation area. Additionally, some of the buildings in a conservation area were listed as monuments (e.g., Pop Recs buildings). In Ee, future use was endangered by population shrinkage in the village. As already stated in the theory on heritage valuation, economic values need to be taken into account as well as socio-cultural values to achieve sustainable heritage development. The case studies confirm this theory as they demonstrate that mere listing is not enough. It is a static instrument which needs an active incentive to guide further development and prevent heritage to fall into disrepair. Partnerships, cooperation and involvement of local communities are proving to be effective tools for achieving sustainable development of architectural heritage and historic areas by integrating protection with development and socio-cultural values with economic ones. This supports the theory in this research, which has more than once stated that a form of partnership can ensure sustainable development of historic areas precisely because of this feature of integration

6.2   Approach to participation

The analysis shows that the partnerships had a different approach to participation in each case. In the case of Ee, the DOM gave rise to action across the protected core and the village which was undertaken by individual residents (see Fig. 23). The HAZ in Sunderland was building on already existing activities in the area as there were already many heritage and cultural organisations active. The HAZ programme did not introduce new practices in the area, but rather strengthened existing activities by providing an incentive to network and identify intervention sites in the defined area (see Fig. 24). It could be argued, that if each of the initiatives would be applied in the context of the other country and place, it would not succeed. Ee as a village, along with its societal structure, challenges, architectural fabric, economic situation and political situation of a smaller municipality would not be suitable for a large-scale operation of HAZ which is built on organisational partnership and targeting of individual historic monuments in the area. And vice versa, the DOM would not succeed in Sunderland since reaching the residents was reported to be a big challenge. This demonstrates that in different contexts, different solutions are needed. These contexts have not only historic and urban, but also societal, economic and political dimensions that are intertwined with each other and have implications for the implementation of each programme. This confirms the theory of collaborative governance, which states that collaboration is influenced by the political, legal, socio-economic and environmental context in which it takes place.
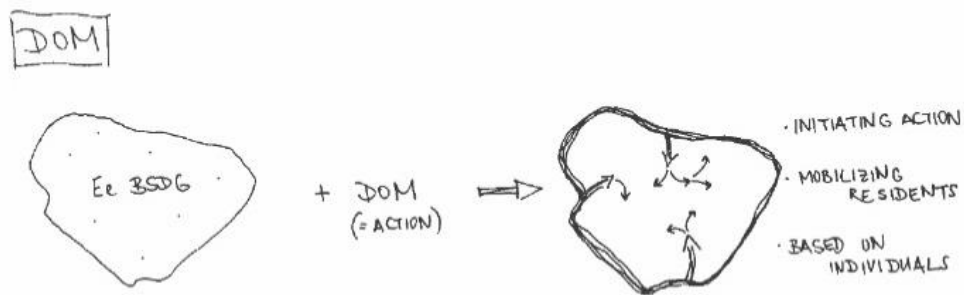
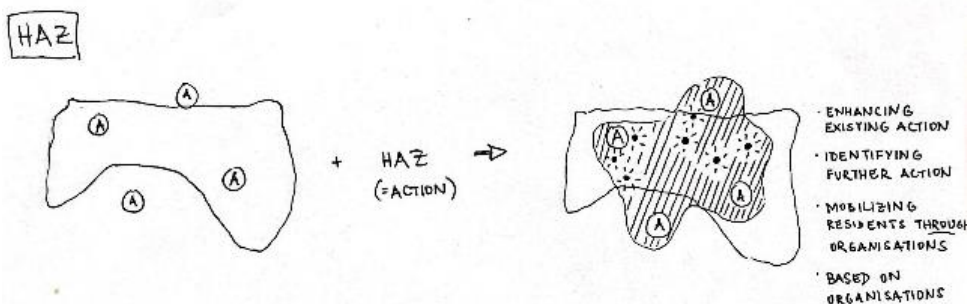*Fig. 23: Implementation in Dorpsontwikkelingsmaatschappij in Ee*

Fig. 24: Implementation in Heritage Action Zone in Sunderland

Moreover, the two case studies present a type of initiative that is not necessarily bottom-up or top-down. Generally, in the heritage sector of both countries, there are examples of grass root initiatives (type A, Fig. 25) that contribute to the preservation of built cultural heritage, such as the heritage societies in England or Stadsherstel in the Netherlands, and top-down initiatives (type B, Fig. 25), like Dutch policy programmes focusing on sustainability or the Historic England public agency. The DOM and the HAZ include both aspects within them which leads to a third form of strategy approach which, for this research, was termed as "top-down leading to bottom-up" (type C, Fig. 25). In both cases, the local governmental bodies had the initiative to take action. In Ee, it was the former municipality of Dongeradeel that started the experiment that eventually turned into the DOM. In Sunderland, the municipality took the initiative to apply for the programme of Heritage Action Zones created by Historic England. The top-down approach, at that moment, provided the private sector and civil society with an organisation in the form of the DOM team in Ee and the HAZ team in Sunderland along with funding for the processes related to the envisioned programme. It was then that the local cultural organisations and two preservation trust organisations took over the initiative to revitalise the local heritage based on this impetus from above, multiplying these efforts, and the organisations and people involved over time. Based on Majamaa's (2008) theory (see Chapter 2), both partnerships could be described as P4. Putting locals in charge, in the form of residents (in Ee) or local organisations (in Sunderland), while ensuring close collaboration with the municipality, has

created sustainable and self-sufficient communities with considerable capacity to initiate action, even after there was no active encouragement from the public sector anymore.
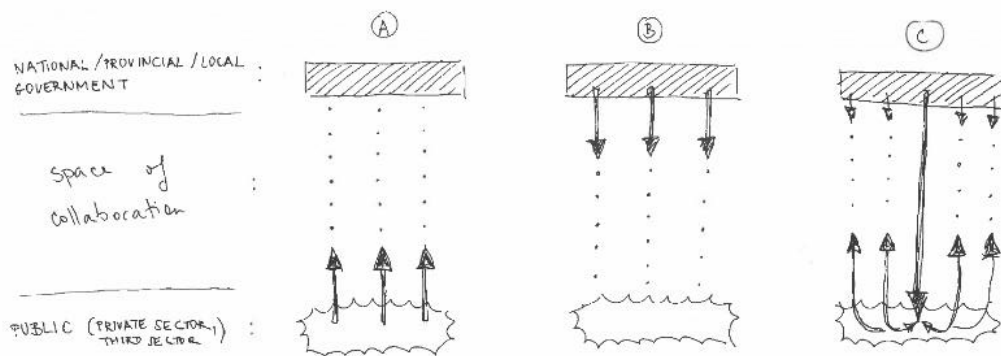

Fig. 25: Three different approaches to collaboration

6.3 The role of social capital and identity in the regeneration of heritage protection zones

To link the results of the case studies to Izadi et al.'s (2020) theory of social sustainability in historic environment regeneration presented in Chapter 2, the following section recalls the five guiding principles which are elaborated on in connection with the case study results:

1- Through collaboration, the system can adapt to its external environment.

Collaboration was at the heart of both partnerships. The partnerships emerged for multiple stakeholders and actors to collaborate. In the words of the theory of Izadi et al. (2020), this collaboration aimed for adaptation - in both cases, the partnership has tried to adapt the historic environment as much as possible to the needs and wishes of the present day, while taking care to preserve cultural and historical values. In Ee, small-scale modifications made to improve the state of the houses while improving the aesthetics of their façades. In Sunderland, many architectural heritage assets were adapted to house new uses and also new technology. Such modifications were achieved thanks to the cooperation of the owners (developers) of the houses, architects, local businesses and organizations interested in using the newly renovated spaces in the buildings, and in some cases the residents who expressed their ideas about the future of the building. Collaboration in the form of partnership was thus a prerequisite for the implementation of the projects they carried out.

2- Trust mobilizes resources to attain goals.

The concept of trust played a specific role in each case study. In Ee and DOM, trust was absent in the relationship between the local municipality and the village. As one respondent confided, there was a general perception that Ee is not a progressive village. However, as the partnership started, the village DOM team proved to be a competent and effective partner in the partnership and proved that together with Ee's residents they can come up with high-quality projects and cooperate with others. As the local DOM team and municipal DOM coordinators worked more

closely together, they built mutual trust. This mutual trust was valued very highly. In Ee, trust existed not only between the partners but also towards the residents in developing their own ideas and finding solutions for their implementation. The residents of Ee were encouraged and trusted that they could be the change they wanted to see in their village, which led to them taking an active role in the regeneration of their heritage.

In Sunderland, the past decisions made by the municipality deepened the feeling of distrust of the residents, as one of the interviewees shared. Relations between the local authority and the people of Sunderland, therefore, lacked trust at the start of the HAZ programme. This was reflected in the difficulty of engaging the local community at the beginning of the programme, as one respondent noted. It is therefore crucial to keep building trust between the citizens and the public sector. As DOM in Ee has successfully demonstrated, a municipality can also put trust in citizens to make the right decisions about their environment and their future. In Sunderland, this could be explored in the future - empowering citizens to make changes themselves.

3- Participation creates coordination and cooperation between citizens.

In this third theoretical principle, the two case studies show different results. In Ee, residents were encouraged to participate by first forming a local DOM team that was open to all village volunteers. Second, anyone could participate by submitting an intervention plan in the village or simply carrying out maintenance work on their houses. As was mentioned in the interviews, the work on the houses in the historic core and people's participation in the regeneration of the village led to people inspiring each other. People exchanged knowledge and experience with each other. For example, in the case of the cemetery project, a group of citizens came together, presented an idea and implemented it. Thus, the fact that the programme encouraged participation in the village regeneration led them to cooperate with each other in the implementation of the project.

In Sunderland, the participation of citizens worked differently. As the results show, citizen participation was not at the forefront of the HAZ project in the beginning. There was therefore no cooperation between citizens. However, the HAZ still encouraged participation among different organisations in Sunderland. As some interviewees reported, the HAZ started with six main partners, but throughout the process, other smaller organisations and businesses joined the programme and cooperated with each other.

4- Sense of belonging motivates the residents to care for their historic environment.
5- Identity is a source of motivation for the residents to contribute to sustainable regeneration of their historic environment.

The last two statements from the core theory of this research can be seen together since the sense of belonging and identity are both closely related concepts. Aaccording to the theory by Izadi et al. (2020), they are both sources of motivation for the regeneration of historic environment. Other words and phrases have been used for these concepts in the previous chapter on case studies such as 'ability to relate', 'pride' and 'place attachment'. The interviews and document analysis in the case of Ee showed that pride and place attachment were present at the beginning of the DOM programme. It proved to be one of the driving forces for one of the interviewees to volunteer his time and be part of the DOM team. The sense of pride was

also very evident in the village vision, which was written by the village board (Dorpsbelang) and co-created with the residents.

In Sunderland, the HAZ programme had to deal with a much greater degree of physical deterioration of the built historic environment than the DOM team had to deal with in Ee. As it was reported in the Sunderland case study, such visible deprivation made it hard for the residents to feel a sense of pride. Based on the theory of Izadi et al. (2020), the reason for the lack of motivation of the residents to participate in the process of regeneration of their city's heritage may be the absence of a sense of belonging and the associated pride in one's surroundings. In reality, of course, there were many factors that made it difficult to involve citizens in the HAZ programme process. One of these, the pandemic, was touched upon in the case study. However, other factors were not explored as they were beyond the scope of this research. Some of the individual HAZ projects attempted to provide opportunities for residents to relate to the city's heritage. It could be argued that the act of relating to a place in one's environment is to begin to create a sense of belonging which later on can become the motivation to care for the future of that historic environment. Given that the HAZ programme has only recently ended, in 2022, it is perhaps too early to assess whether this attempt to enable residents to relate to their environment can be a source of motivation for them later on. However, change in an area of the size and complexity of Sunderland's East End is unlikely to happen in the short time that the HAZ programme lasted, so further research may provide more answers in the future.

6.4   Significance of the research

This research is relevant to two fields at once, spatial planning and heritage studies. Academic research into heritage has tended to use a singular lens of one or the other field. This is understandable because, as explained in Chapter 4 of this research, heritage has long been a separate and expert-driven field. However, as the complexity of the issues facing the built environment calls for more integrated approaches, this also has implications for research. This research attempted to address the issue of heritage integration in spatial planning by integrating two academic disciplines, heritage studies and spatial planning. Thus, this research is unique in the way how it perceives heritage in the built environment as it acknowledges its physical expression through the built environment but also its intangible attributes. This research complements conventional research on the regeneration of built heritage by recognising intangible heritage in terms of a sense of place and identity. Moreover, the results show that listed historic areas should not be perceived as protected "islands" within the urban and rural fabric but as a fully-fledged part of the territory of a city, town or village. Having a heritage status should not result in stunted development of these areas because, as this research has shown, historic areas must also continue to develop and confirm measures of economic, social and environmental sustainability.

This research can be useful for policy-making processes that deal with heritage protection and development in rural as well as urban contexts. The results suggest that initiating public-private partnerships that involve local communities of residents and organisations can have a positive impact on the protection of historic areas and their spatial, social and economic development. This can be useful knowledge and incentive for employees of the public sector and those in charge of spatial development of specific (historic) areas to support partnership programmes or to even seek them out. This research also shows the great potential of heritage for spatial

regeneration of a physically and economically deprived area and so it can provide further inspiration for policy makers to focus on tangible and intangible heritage as a catalyst for change.

6.5   Limitations

Due to time constraints, this research could provide limited attention to the topic at hand. The analysis of the European heritage protection zones focused only on seven countries. It would have been beneficial to conduct more in-depth research in order to contextualize the Dutch and English protection instrument to a greater extent. Additionally, the limited amount of time also meant constraints on the number of interviewees for the case studies. In the respondent search phase, it proved difficult to make contact with people who had been involved in both programmes. The contact information was often out of date, or there was a lack of interest from organizations or individuals to participate.

The language was another limitation to this research. Considerable time was dedicated to document translation. During the analysis phase of European heritage protection zones, there was a lack of knowledge regarding the relevant keywords to determine the preservation methods adopted by different countries for their historical sites. The online translators that are publicly available generally provide good quality translations. However, it is possible that some parts of international documents may not have been translated accurately. The research would have benefited from consultation with experts from different countries to confirm the validity of the results presented, but this was not possible due to the aforementioned time constraints.

7. CONCLUSION

As the world will need to adapt to various challenges, such as climate change and urbanisation, historic areas need to keep up with these changes. This may, however, sometimes prove difficult due to the development constraints in place. Participation practices are believed to bridge the divide between protection and development. This is why this research set out to examine the tension between development and protection in heritage protection zones through the lens of collaboration between different sectors by asking the following question: '*How can public-private partnerships with civil society involvement enhance protection as well as development of heritage protection zones?*'. To answer this question a series of subquestions were first explored. In Chapter 4, the characteristics of European heritage protection zones were analysed. It was shown, that heritage protection zones are a common instrument for regulating historic areas in a number of European countries. Seven instruments were further studied which demonstrated that there is a variety of terms used to describe them as well as different times when each instrument was introduced. The definitions of these instruments, however, showed a common emphasis on immovable property and their aesthetic appearance.

Chapter 5 explored the Dutch and English context of heritage protection in detail. The planning systems in the Netherlands and England differ, as the former is a regulatory planning system and the latter uses a discretionary approach. However, the approach to development in heritage protection zones in both countries is similar since any major alteration of the built fabric in these areas requires a permit from a relevant department within the local government. The relationship between protection and development in these areas is therefore unbalanced in policy terms, as there is more guidance on protection than on development. For both countries, this chapter also explored the state of collaborative governance and participatory practices in the heritage protection zones in general. In England and the Netherlands, there are examples of top-down as well as bottom-up initiatives that pursue the preservation of historic buildings and areas or their development. The extent of civil society involvement varies from initiative to initiative, and further research would be needed to assess the extent to which civil society plays a role in the protection and development of cultural heritage on a country-wide scale.

To provide an answer to the main research question, a comparative case study approach was used. By using two case studies, it was possible to analyse two distinct international contexts of regeneration of historic areas which both confirmed the benefits of using partnerships as a governance tool for protection as well as further development of heritage protection zones. The interviews provided crucial insights into the partnerships and their processes and unfolded their qualities as well as the hurdles they needed to overcome.

The Dutch case study was the Dorpsontwikkelingsmaatschappij partnership in the Frisian village of Ee and the English case presented the Heritage Action Zone partnership in Sunderland. The two case studies have shown that participation can enhance both protection and development in many ways: by improving the built environment, giving an economic boost to an area, promoting social cohesion and empowering communities in the long term. These cases also show the need for active management of heritage protection zones, as regulation of their development through listing cannot fully ensure their future. The instrument of protection is important for the preservation of cultural-historical values. However, it is not enough to steer development in the right direction which is economically, socially and environmentally sustainable. Initiatives such as the Dorpsontwikkelingsmaatschappij (DOM) in the Netherlands

and the Heritage Action Zones (HAZ) in England are examples of programmes that contribute to the sustainable regeneration of historic areas by integrating the efforts of preserving local heritage with socio-economic and spatial development.

The results of these cases demonstrate two models of participation in heritage. The two models were applied in places with a specific historical, socio-economic, urban and political context, and even though they show common results in terms of improvements in the area, they cannot be taken as a general approach to solving challenges in historic areas. Participation in heritage and its development can take many forms and it cannot be a one-size-fits-all approach. In each historic area that is about to be revitalized, the stakeholders should first dedicate time to evaluating the area, to understand what are the issues and who are the concerned parties. After that, challenges should be described, goals identified and a programme drawn up, all tailored to the area or the type of areas in question. The DOM was targeting villages whereas the HAZ was targeting conservation areas that were on the 'At Risk' register made by Historic England. Encouraging citizens to participate proved easier in the case of DOM than in HAZ, which can be attributed to the structure of the schemes. However, there may be other aspects at play in terms of societal structure. For example, in the case of HAZ, the interviewees reported a lack of trust in the local community and a bad experience with the public sector and their planning decisions. Further research into the social tissue of these problems could provide more answers on the reasons for this, as this thesis did not specifically focus on it.

The findings also show that heritage need not be a constraint and can be seen more as an opportunity for development. As already mentioned, this cannot happen automatically, it needs to be acted upon. A thoughtful programme can help turn a problem into a solution. To do this, space must be provided for open communication: communication among residents, cultural organisations and non-governmental institutions, and most importantly between all of those and the local government. Even though the citizens in Ee and the local organisations in Sunderland proved to be the ones that executed the action in the form of creating development plans, building maintenance and adaptive reuse of historic buildings, the public sector initiated or enhanced such action by having the desire to improve these areas. The case of Ee demonstrates the importance of the motivation of the public sector to collaborate as the respondents from Ee indicated that the absence of local government contributes negatively to the current problems related to the energy transition.

7.1   Recommendations

This research provided findings on participation in heritage development based on two cases, which are specific in the type of heritage they deal with, their geographical area and socio-economic context. The findings demonstrated two different models of implementing participatory practices and although they provided similar results in terms of how it enhances participation and development, these results cannot be taken as a generalization for participatory processes and community empowerment in heritage protection zones in general. A question needs to be asked, "How can participation and community empowerment come about in various types of heritage protection zones?". In the Dutch context, this points to other categories of BSDGs which were not explored, such as dense city, green city, building ensemble, landscape and city park (see Chapter 5). The English case focused on the context of a city and therefore the context of an English village should be analysed further. Similar research could be carried out in other countries such as Spain, France or Germany, which have

been only briefly touched by this research through the analysis of area-based protection instruments in Chapter 4. Another important question to be asked is "Why does participation work in some places and not in others?". Thus, the absence of participation is equally important to examine as its presence. Other necessary questions would be, "What are the specific challenges that heritage protection zones deal with?", "What are short-term and long-term aims and how to reach them?" and "Who to involve in the different scenarios?". These steps could lead to identifying patterns which could further lead to creating models to be implemented in different scenarios. This could bring several benefits to government bodies by speeding up the process of decision-making when it comes to heritage or area revitalization. Moreover, it could lead to a sustainable system of communities taking care of their heritage and feeling a sense of ownership, identity and belonging.

7.2 Contribution

The results of this research have filled a gap in the literature on the governance of protection and development of heritage protection zones by focusing on specific cases in the Netherlands and England. The theoretical framework, as described at the beginning of this research, was largely confirmed as the case studies showed heritage to be a strong catalyst for socio-economic a spatial development and partnerships to be an important tool of governance to reach such developments. In addition, this research is an important contribution to both fields of heritage studies and spatial planning. The academic literature lacks examples of research that draws on and integrates both areas. This research has attempted to integrate the two into a single entity in the hope of providing comprehensible results for both spatial planning and cultural heritage professionals, thereby bridging the communication gap between the two fields. As this research was carried out within three institutions – the Utrecht University, the Netherlands Cultural Heritage Agency, and the Environmental Assessment Agency of the Netherlands – multiple perspectives from different professions have been taken into account and they have been translated into what is hoped to be a common language in this thesis.

In conclusion, the main message that this research has attempted to convey is that heritage in our built environment cannot remain still only to be passed on to the next generation in an 'as-found' state, as the 19th-century heritage theorist John Ruskin would have envisioned. A common misconception is that protecting heritage from external influences will ensure its future existence. However, as this research suggests, the opposite is true. Mere protection of the built heritage and historic areas, without active efforts to integrate the external threats, only contributes to the musealisation of the historic environment. Historic areas are not just the buildings, streets and public spaces they create, but also the people who inhabit, care for and use them. The social fabric of these places holds great potential for authorship over their environment, but until recently people have not been encouraged to actively express this. When people have a relationship with their environment, whether a historical or modern one, they are more likely to care about what happens to it. Although not everyone may be interested in heritage, establishing a closer relationship with the landscape can increase awareness of an area's history and potentially inspire and empower people to make valuable contributions towards its future.

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