PrEseRvIng and sustainably governing Cultural heritage and Landscapes in European coastal and maritime regionS

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1. Executive summary

This deliverable summarises the findings of the policy and practice stakeholder interviews across nine PERICLES case regions. These aid our understanding of how cultural heritage is understood by policymakers and practitioners, and what obstacles prevent the development of more integrated policies and practices.

The expression of cultural heritage in policies varies across the regions analysed, even at the elementary level of how heritage is conceptualised. Different regions are also at different stages in marine plan development, which could impact how cultural heritage is represented in marine policy.

Despite the differences, common concerns were raised across the PERICLES regions:

(i)   Undesignated and intangible heritage are difficult to protect and integrate into policy;

(ii)   The influence of economics on heritage as a driver of policy is often to the detriment of heritage; and

(iii)   There is a need for greater consideration of the historic landscape and better integration of the landscape into heritage management.

The integration of cultural heritage into policy was described as ineffective in all of the contributing regions. This was suggested as resulting from exclusion of some types of heritage, lack of political will, poor implementation and the privileging of other issues over cultural heritage.

Top-down policy formation prevails, but opportunities for stakeholder participation are available in all regions. However, the difference between consultation and deliberation was emphasised, and the need to create an appropriate deliberative setting was emphasised.

While the majority of policies contain plans for implementation *and* monitoring, deficiencies in monitoring raised concerns over the achievement of policy objectives.

PERICLES will proceed to work with decisionmakers at multiple scales to provide a suite of policy recommendations to improve integration of cultural heritage in key marine and environmental policies and implementation of associated EU policies.

2. Introduction

PERICLES is an EU-funded research and innovation project running from 2018-2021. PERICLES promotes sustainable, participatory governance of cultural heritage in European coastal and maritime regions, with the aim of developing and demonstrating a comprehensive framework to understand, preserve and utilise maritime cultural heritage for societal good.

European coastal and maritime regions are historically rich with unique land- and seascapes, tangible artefacts, and intangible cultural heritage. The protection, conservation, and management of this cultural heritage has been on international policy agendas since the 1950s. Despite the inherent need for a transdisciplinary approach in planning and policymaking, cultural resources are often disassociated from natural resources and processes.

PERICLES is exploring the integration of cultural heritage into maritime and coastal policies. In doing so, PERICLES seeks to understand how cultural heritage is understood by policy makers and practitioners, and what institutional, cultural, knowledge or professional obstacles prevent more integrated policies and practices. PERICLES aims to use this information to determine how policy making might be improved for more effective preservation and sustainable exploitation of cultural heritage.

PERICLES promotes a concept of participatory governance which is grounded in theories of deliberative democracy, social learning, plural values and co-production. PERICLES is therefore also investigating how policies are formed, to identify how deliberation and participation in policy formation and implementation can be improved.

Semi-structured policy and practice interviews were conducted with key stakeholders from central and local government, private providers and NGOs to explore how cultural heritage and coastal and marine institutions collaborate with each other and with stakeholders to create the necessary integration and evidence required for effective policy. Building on a critical policy analysis which illustrated the explicit policy connections between cultural heritage and other coastal and marine policies, the interviews develop an in-depth understanding of both formal and informal policy integration in practice, and the actors, mechanisms and processes involved in policy formation.

This report summarises the findings of the policy and practice interviews across the participating PERICLES case regions: Ireland, Northern Ireland, Scotland, Portugal, Malta, The Netherlands, Estonia, France and Denmark. A summary of the number and type of stakeholders for each region is provided as an appendix.

3. Cultural Heritage in Policy

This section contains summaries of findings from the stakeholder interviews on the expression and interpretation of cultural heritage in policies. These findings elaborate on how cultural heritage is understood in policies in different PERICLES regions, providing insights into the extent of integration of cultural heritage in key policy areas, such as marine, environmental and sustainable development policies.

The prior desk analysis of cultural heritage in key policies (PERICLES Deliverable 5.1) revealed that the expression of cultural heritage in policy varies across the regions analysed. This perspective was reinforced in the interviews. For example, while in Scotland policy makers are faced with the challenge of incorporating multiple interpretations of heritage brought by a move from bottom-up conceptualisation of heritage, in Denmark policy makers would welcome such diversification of what is referred to as their narrow view of heritage. Perhaps, however, this is less a matter of different perspectives on heritage, but rather being at different stages in the restructuring of understanding and managing heritage that is brought about by the increase in bottom-up heritage movements. Notably, in countries where cultural heritage was not well integrated into national policies, such as France and Portugal, it was better integrated at the local level. Different regions are also at different stages in marine plan development, which could impact how cultural heritage is represented in marine policy. Another key difference is the view of cultural heritage in some areas as something to be regulated and simply preserved, but in others also as something to be enhanced, enjoyed and benefitted from.

There were, however, three strong common themes that were raised as issues by interviewees across the PERICLES regions. The first of these is the difficulty of protecting undesignated heritage, or unofficial heritage. This is an issue that was raised in Northern Ireland, Scotland and Malta. Part of the problem is the question of how to conceptualise it and how to value it, in order that provisions to protect it could be incorporated into policy. Another problem would then arise in establishing where this undesignated heritage would fit into plans in relation to other planning factors, for example to officially designated heritage sites or to significant local benefits resulting from development. Related to this are shared issues surrounding intangible heritage, which is problematic for policy makers for the same reasons and had emerged from the PERICLES policy analysis as a key gap. The move towards more inclusive conceptualisation and management of heritage drives the need for undesignated and intangible heritage to be included in policy and planning, and this is clearly recognised by policy makers, however the mechanisms by which to include it have yet to be realised.

Another common theme across the regions was concern over the influence of economics of heritage on policies. Interviewees in Scotland were critical of the reduction of cultural heritage to monetary value, and in Northern Ireland, Portugal and Malta interviewees criticised the prioritisation of economics over heritage and the commodification of cultural heritage in tourism development. The lack of an economic value attached to authentic heritage or the social benefits relating to it allows financial values to dominate policy direction and puts much authentic history at risk.

Finally, interviewees expressed a need for greater consideration of the historic landscape and integration of the landscape in heritage management, suggesting that the frequent references to natural heritage and the landscape found in the PERICLES policy analysis are not translating well to

practice. In Northern Ireland, for example, there was suggestion of a need for better enforcement of existing policy and legislation, as well as for a defined buffer zone that could be more rigorously enforced. In Malta, meanwhile, NGOs and locals felt the cultural importance of the local area's natural heritage was neglected by the government, and were supporting initiatives to raise appreciation of it. Whether through appreciation or regulation, there was an expressed need to include the surrounding landscape more strongly in cultural heritage management.

3.1   Northern Ireland

Northern Ireland adheres to the UK Marine Policy Statement which has a clear policy towards the protection of designated heritage. Interviewees confirmed that this policy widely recognises the importance of tangible heritage assets and the need to protect them as they are irreplaceable and can be damaged, disturbed or destroyed by natural process and human activity.

Management of coastal and maritime cultural heritage has been more formally adopted in Northern Ireland since 2014 with the appointment of a dedicated marine heritage curator or archaeologist. The person in this role manages the record of the marine historic environment and the dissemination of this information to support marine planning, heritage asset management and improved public awareness and enjoyment, as well as ensuring that marine heritage sites have appropriate protection and management, and providing curatorial advice to support marine planning and policy.

The expression of cultural heritage in policy in Northern Ireland, however, is not without criticism. One of the heritage professionals interviewed believes that Northern Ireland is behind the rest of Europe in terms of awareness of coastal and maritime cultural heritage and thinks that there may be a blasé attitude towards heritage in Northern Ireland. Three interviewees raised a specific weakness in Northern Irish policy concerning the intangible aspects of cultural heritage. This was referred to as a general issue but as an example one mentioned that preservation of traditional heritage skills, such as boat building, is overlooked. The neglect of intangible heritage described in the interviews reflects the findings of the PERICLES policy analysis at the national level, where any references to intangible heritage tended to be minor points and loosely described. Intangible cultural heritage was seen more strongly represented in local-level policies, which also tended to be formed in closer connection with stakeholders and communities in the area, and a route to better representation of intangible cultural heritage in policy and planning in Northern Ireland may be through the formation of policy in closer collaboration with these groups.

An employee of a government department also spoke of a difference between cultural heritage in planning policy in principle and in practice, where it "can be undermined by a poor evidence-base, lack of specialist investigative skills amongst the Northern Ireland archaeological consultancy sector and a poor understanding on the part of the developer as to why they should be taking what is very often a precautionary approach to potential underwater or sub-tidal archaeological discoveries."

Another development issue cited was the lack of protection for the historic landscape or seascape. Both the UK Marine Policy Statement and the Draft Marine Plan for Northern Ireland state that the marine plan authority should take into account the existing character and quality of seascapes, but some interviewees were unsatisfied with this in practice. The need for consideration of a buffer zone

of landscape around heritage sites was emphasised by one. In their experience, even where policy or legislation includes this provision, they find it is often not enforced. Unofficial development around heritage sites is a significant issue for heritage professionals and they believe not enough is being done outside the confines of the official designated area. Official development was also criticised by two interviewees who considered in some cases, such as Titanic Quarter, there was a focus on economic interests, over others such as social, environmental and heritage interests.

Other concerns that were briefly referred to include the need for protection of undesignated heritage, the unmitigated impacts of unregulated marine activities and a reluctance of policymakers to make bold decisions.

3.2   Scotland

In Scotland, the main body responsible for cultural heritage is Historic Environment Scotland (HES), formed by the merger of Historic Scotland (HS) and the Royal Commission on the Ancient and Historic Monuments of Scotland (RCAHMS). Historic Scotland was an executive agency of the Scottish Government, RCAHMS was a non-departmental public body and following the merger, HES is also a non-departmental public body. HES is sponsored by the Scottish Government's Culture and Historic Environment Division (CHED), and a key part of the formation of CHED was the transfer of HS policy staff to the Scottish Government with the intention of mainstreaming the historic environment within Government. However, staff movement now means that the current policy staff in CHED are no longer the ones originally transferred from HS. HES link to the marine planning system through Marine Scotland and the Regional Planning Partnerships and play a significant regulatory role in relation to designation and in providing advice. HES is consulted in policy making and advocates for recognition and protection of the historic environment, but it no longer has an internal policy function within the Scottish Government and operates with a reduced policy team.

Cultural heritage was "integrated from the start in the development of the legislative framework for the marine environment" through collaboration of Government agencies responsible for cultural heritage and marine policy, i.e. Historic Scotland and Marine Scotland. While one heritage professional felt that it was still too early to assess the impact of marine planning on maritime cultural heritage, two other participants from the planning and heritage fields thought that it had been beneficial. One heritage expert emphasized the importance of introducing the UK Marine Policy Statement as a Statutory Plan as it included provision for cultural heritage and set principles for heritage assets which apply to all authorities in the marine sector, although they thought the full benefits of this are yet to be realised. Another interviewee described how marine planning has enabled a better recognition of Cultural Ecosystem Services (CES), which include heritage and traditional activities. This was thought to reflect a better recognition of and attempts to "protect cultural heritage in different ways".

All participants thought that this system of protecting maritime heritage through the National Marine Plan works well at a national level and for protected sites but is currently unable to capture the importance of sites or landscapes that have cultural and heritage value, but which are not protected legislatively, despite the growing recognition of CES. The same concern was raised for areas that are important at a regional or local rather than at a national level. One planning expert expressed

concerns that if evidence on what people thought was important was not available, then it would be difficult to protect what was of local value or to avoid conflict during the planning and licensing process.

All participants expressed concern about the challenges of capturing this kind of information. Local communities can be difficult to engage or unwilling to share information, and planning partnerships and heritage bodies may not currently have the expertise available to collect this kind of evidence. This is an important point that all participants were very keen to address, and they look to the academic community to help bridge this gap. A similar gap exists for intangible cultural heritage which is not currently protected in legislation in the UK and which requires new and different ways of working. All participants felt that felt that this is not yet being considered as well as it could be, and that the academic community had a significant contribution to make in this field.

It could be argued that the provision for Regional Marine Plans and their development by regional Planning Partnerships is intended to address these issues. However, the Planning Partnerships are not very well resourced and the expertise necessary to address this evidence gap is unlikely to be available within a partnership team. Two participants also voiced concerns about the lack of an established approach which could be implemented nationally to collect a coherent body of evidence that can be integrated into the planning and protection systems. One interviewee also made the point that even if this sort of data was elicited, recorded spatially and integrated into policy, it was still uncertain what weight it would be given in planning and licensing decisions. Another participant also argued that while marine licensing routinely necessitates consideration of impact on heritage, a general weakness in marine planning is that current marine plans are thought to be "too broad, vague or aspirational and do not provide the same level of detailed advice as would be given in a land-based plan". A related point made by another participant was that when heritage is being considered at the impact assessment stage, then it is already about valuing a loss of or impact to heritage rather than collecting data up-front to inform direction.

These points relate to underlying issues about two main themes: how cultural heritage is conceptualised and valued; and how it fits into a complex system intended to manage the many, sometimes conflicting, dimensions of the marine environment at different scales and while considering and weighting different kinds of evidence.

The points made about the difficulty of capturing what is valued heritage, CES and locally important locations speak to a changing understanding of, and approach to, cultural heritage. One heritage professional described how traditionally, cultural heritage was conceptualised and managed in what could be described as an elitist, top-down way. What was considered to be important heritage to be protected was mainly based on expert opinion. This is now changing, and heritage professionals are trying to take a much more inclusive approach to cultural heritage and its protection, to include other aspects such as social value. In doing so, heritage professionals are having to change their own perceptions and working practices and may not yet be familiar with methods needed to work in this new way.

The second, related, issue concerns where cultural heritage 'sits' in the marine planning system which is in turn linked to how it is conceptualised within government and across different agencies. One participant described how in English policy, heritage was framed as more of a constraint rather than as a positive thing that can bring social and economic benefits. The situation in Scotland is different, as

the Scottish Marine Plan does recognise the potential for benefits linked to cultural heritage. However, another participant described the difficulty of deciding where to integrate the historic environment in the Atlas and the National Marine Plan, which is itself indicative of more general difficulties of including it in broad policies. The participant described how including the historic environment in the Productive Seas principle has valuation implications. The importance of cultural heritage is currently being evaluated through economic benefit analysis, with the consequence that the real value of cultural heritage is obscured by a reductionist monetary approach which cannot "capture the full quantitative value of cultural heritage".

Difficulties of showing the broader value of cultural heritage in itself, as a contributor to society (for example its role in wellbeing) and in other growth-oriented policies was a concern of heritage professionals. This is linked to the related concern of planning professionals on how best to capture the value of certain locations in a way that can be incorporated into regional plans. The academic community can contribute here in sharing experience with different non-monetary valuation methods and/or metrics as well as with eliciting social and cultural values pertaining to cultural heritage and the historic environment.

3.3   Portugal

The intangible aspects of cultural heritage tend to be more discussed in local arenas. Particularly with regards to regional/local cultural heritage, municipalities tend to dominate the discourse, namely through municipal museums. An example of this is the Ílhavo municipality's cultural heritage policy (Ílhavo has a Maritime Museum, a Library and Archive focused on maritime cultural heritage, and educational services; it also promotes training workshops, festivals, events and instigates residents to participate in cultural heritage activities through citizen science mapping). http://www.museumaritimo.cm-ilhavo.pt. Another example is Aveiro municipality's saltpans Eco-museum http://mca.cm-aveiro.pt/rede-de-museus/ecomuseu-marinha-da-troncalhada/. In the Aveiro Case Region, the University of Aveiro also plays a key role in cultural heritage preservation. The University owns five saltpans, one of them a pilot-area for the dissemination of cultural and natural heritage. A team of researchers develop training activities for students every second year. At the end they can obtain a certificate to be a guide in the saltpan.

The interviews with stakeholders revealed that tangible aspects of cultural heritage are mainly included in these policies. It was mentioned that the intangible heritage is still seen as a new concept, even though there is an intangible heritage national inventory. It was also mentioned that working groups, e.g. the work group designing the integrated coastal zones management policies, should include experts in heritage.

Some stakeholders interviewed considered ignorance to be a problem, because people can act without having a solid knowledge about cultural heritage, having only a short-term vision and focusing mainly on profit. In some cases, this vision was related to the fact that heritage is not recognised as an important asset for local development, with stakeholders sometimes referring to the concept of heritage as somehow still static, preserved from the past, and seen only in museums.

Coastal and maritime cultural heritage in the Aveiro Lagoon region is both natural and cultural, so the lagoon is an anthropogenic cultural landscape, a mosaic with diverse uses along the centuries. In this context, PERICLES could provide some recommendations regarding the coastal and maritime cultural heritage of the region, its risks and potentialities, resulting from the participatory initiatives with the stakeholders, providing coastal and maritime cultural heritage-oriented inputs and recommendations for specific local development in the region.

3.4   Malta

Fieldwork (November 2018) conducted in Marsaxlokk, Malta, uncovered seven heritage narratives. Drawing on 25 interviews with key sectoral actors, practitioners and policymakers, the narratives present how heritage is understood at the local level.

Heritages as important elements of rural tourism development.

Local residents define fishery traditions as unique heritage of Marsaxlokk that attract tourists. They remark that being a fishing village is what provides economic growth through new activities mainly in hospitality, tourism and real estate. On the other hand, environmental NGOs and heritage experts, see more tangible heritage aspects linked to the environment or historical buildings (or the combination of both) as the real driver for tourism development. In any of the cases, all stakeholders see economic value of tangible and intangible heritage. However, there are some concerns as heritage can become commodified or too commercialized, with the worry of missing opportunities to be included in this development, especially from the community side. Over-tourism can be a threat and has to be handled carefully. Not all stakeholders have the same perception: for instance, hawkers or local restaurants benefit the most from a big flow of tourists, while other actors, such as the community, might see over-tourism as a cause for losing space and identity.

Official and unofficial heritages.

There are different understandings of what represents official and unofficial heritage. Heritage experts see themselves as the guardians of official heritages, which are the relevant or historic buildings and archaeological sites, as well as natural heritage sites. Those are the ones that are formally recognised as worthy to protect. Unofficial heritage is mainly linked to other materials, practices or resources from the past that are perceived marginally significant by the state but that are very meaningful and appreciated by certain individuals or communities as their cultural capital or important communal memories. In the case of Marsaxlokk, the fishery culture and the hunting tradition are considered unofficial heritages. The distinction between official and unofficial heritage is crucial in analyzing the heritage narratives from different stakeholders. Official heritages with archeological and monumental significance are often preserved according to strict regulations. However, the intangible social practices considered as unofficial heritages often lack proper management and preservation. This distinction influences how the heritages are understood and managed by different stakeholders.

Place attachment formation: local identity or appreciation of nature.

The interviews with the local community show a strong sense of place attachment across all the generations. Place attachment refers to the emotional bond between person and place. The unofficial

heritage has been observed as references of identification with the place and also as an instrument of communal bonding by indigenous residents in Marsxalokk.

The engagement of the local community with fisheries has a long history in Marsaxlokk. Therefore, the fishery culture represents a local identity that is historically rooted and will hopefully be passed on to future generations. Even though fishing activities have scaled down, the identity stays strong, out of respect and gratitude for the past efforts of the fishermen to build up the fishing village. The identity of being part of the fishery culture strengthens the feelings of belonging to the place, where traditions are nurtured and the culture is shared by the locals.

Yet, new inhabitants show more place attachment to factors other than the fishery identity. They are attached to the unique picturesque landscape, the less developed rural natural environment and the accessibility to the natural heritages. The interviews also suggest that the strong sense of place reinforces the local community's appreciation for communal ideals. Marsaxlokk serves as a place within which the residents' personal or community bounds are nurtured. The strong emotions toward the place help to form the sense of the ownership to the place. Being part of the place or the sense of belonging encourages the individual or the group to commit to an ideal version of the place where they have lived.

However, different reasons for local residents to form their own place attachments may act as obstacles in forming a collective vision in local development since they have different communal ideal images. In addition, those residents with a strong local identity tend to reject the opinions of outsiders. From interviews with stakeholders, longstanding residents often perceive new residents as outsiders and the local council often perceives cultural and natural heritage conservation NGOs as outsiders. The strong place attachment to Marsaxlokk provides another incentive to motivate active participation. However, stakeholders demonstrating different factors in forming place attachments may indicate the difficulties in the formation of collective goal in heritage management among stakeholders.

Coastal spatial conflicts and spatial planning value of heritage.

The local narratives also reveal that the residents seek to establish links between the village's present situation and its heritage past at a spatial level. The tourism development in Marsaxlokk has brought in many different stakeholders that use the spaces of the waterfront, including restaurants, hawkers and hotels. Since the spaces of waterfront bears much of the residents' (fishermen) memories and emotional connection, the interviews show that the residents tend to interpret the loss of space at the waterfront as the loss of the important heritages, as well as the loss of identity.

These examples document the relationship between place attachment and the spatial role of heritage in the process of community bonding and it also shows the link between heritage's spatial dimension and residents' local identity. It is observed that the spatial dimension acts as community's identity reminders, a phenomenon where local intangible culture is practiced in public spaces and is connected to heritage landscapes. In addition, the observations and interviews show that spatial proximity to heritage resources (e.g. living within the center of fishing village in Marsaxlokk or close to the waterfront) reinforce place attachment and advocacy for participatory planning. The waterfront is closer to the residents' daily life and to the operations of the fishermen that bear more fishermen's memories and emotional connections.

Two peninsulas with both historical and natural heritage value, on the other hand, are more distanced from and therefore remote to the residents in Marsaxlokk. It is interesting to note that more care from the residents in Marsaxlokk is shown at the waterfront area than in the two peninsulas.

There are many different stakeholders with great interest in using the coastal areas in Marsaxlokk, especially the waterfront area. The restaurants need the space for serving the customers. The hawkers need the space to sell souvenirs to the tourists. The fishermen, for a long time, has used the place for maintenance work when they are back from fishing. The locals use the place as playground and for social interactions. The majority of the locals consider the loss of the place as the loss of part of the heritages and part of their identity.

Local development and community's feeling toward political status quo.

The interviews reveal residents' strong discontentment toward the government authority and local council when it comes to the disappearance of the Marsaxlokk's identity of fishery culture and the disappearing of the traditional spaces for the fishermen to use.

The residents point out the incompetence and ignorance of the government. Strongly opinionated interviewees consider politicians to be opportunistic and corrupt, that see their personal interests more important than the public interests. Yet, it is observed that the local residents express a mentality of clientelist relationship toward the government. Local residents believe that the government is responsible to make the change and to fix the problem. And it is the government that needs to come up with the solutions since they are the one elected. The long-established mentality is considered stemming from the top down governance tradition in Malta. In addition, many interviewees noted that politicians show no interest in citizens' opinions, which results in citizens feeling powerless and distant from policy making.

In combination with the above two narratives, it is revealed that the inability to translate disappointment for the present situation into an alternative course of collective action on behalf of citizens is probably affected by their current state of disempowerment. The above interviews imply that the overall distrust of local community members toward the government has been hampering a common approach to local heritage management.

Natural heritage and nature as the surroundings of the built heritages.

From the interviews, not only ecological concerns but also human interests toward natural heritage are addressed throughout the narratives. Elements of natural heritage, and especially the waterfront landscape, are considered local heritages due to their contribution to place identity, beauty and uniqueness.

The narratives from the local residents of Marsaxlokk reveal that the cultural and built landscape of the fishing village is often defined by the waterfront. It is observed that the relation to the sea is fundamental to community identification with the place. Residents commonly regard the sea as a symbol of their home and fate. In addition, the residents also consider the sea an important source of local economy. Nevertheless, the inland residents show great appreciation to the peninsulas' great view and open green spaces. They express the needs and the desire of the residents of the urban areas to enjoy the limited green spaces in Malta.

Apart from the Maltese people who live inland, the tourism authority and local natural conservation NGOs also consider the undeveloped peninsulas around Marsaxlokk as natural heritages that need further management and preservation. From the perspective of the tourism authority, the combination of the historic built heritages and its natural surroundings attract tourists not only who love historic sites but also the ones who love the natural and rural experiences. And from the natural NGOs' perspective, the uniqueness, beauty and possible ecosystem services from the natural heritages on the two peninsulas have long been neglected and underappreciated. Rural- or ecotourism is a way to get local residents and the government's authority to pay more attention to its value.

The interviews with people from cultural heritage conservation NGOs also indicate the importance of the natural surroundings of the built heritages. Since spatially, it's impossible to manage the historic sites and natural surroundings separately, the nature landscape is considered part of the built heritages.

By turning more focus from the official heritages toward natural or unofficial heritages, it helps to make people realize the inseparable nature of natural environment, traditions, cultures and people's daily life. It also helps to cultivate people's appreciation of the importance of environment and nature. Consequently, the system thinking may change people's mentality and turn into the pursuit of better quality of life rather than only focusing on economic growth.

Although the narratives show that stakeholders' recognition of the importance of natural heritage in Marsaxlokk has been growing in general, different stakeholders put their priorities in natural heritage management differently.

This difference therefore may possibly lead to scattered distribution of the resources and conflicts in natural heritage management in Marsaxlokk. For example, the cultural heritage preservation groups tend to put more resources in the preservation of built heritage and consider their natural surroundings as the second priority. The natural heritage conservation group, on the other hand, put priority in the biodiversity and nature preservation. The built cultural heritages located in the park are considered the addition to the tourism value of the nature park and would only be restored after the restoration of the nature elements in the park.

Common and contrasting views

As discussed in the previous six sections, the interview data reveals a wide spectrum of community attitudes and perceptions toward heritages. When it comes to perceptions, some members of the local community consider the fishery culture as heritage, whereas some others recognize the unexploited nature as heritage. With different perceptions and definitions of local heritages, stakeholders show different attitudes and level of concern, from caring to negligent. The different opinions found in the interviews indicate the possible conflicts and coalitions among the stakeholders. Stakeholders who share more similarities in local heritage narratives are prone to form coalitions in the decision-making process. NTM, along with other natural and cultural heritage conservation NGOs, new residents of Marsaxlokk, and tourism as well as environmental authorities, share similar narratives. They value the importance and beauty of natural heritages and the love toward the nature form their place attachment to Marsaxlokk. Their plan to promote eco-tourism also enhances their concerns and cares to the local natural heritages over other types of heritages. On the other hand, the

local council and indigenous residents share similar narratives in focusing on promoting in-depth cultural heritage tourism with emphasis on providing unique fishing village experiences.

With limited resources for heritage innovation, the different foci of the two coalitions often result in conflicts in resources allocation. The above-mentioned coalitions and conflicts are enhanced by the gap between official and unofficial heritage. Natural and built historic heritages are considered official heritages and therefore get more attention and support from the central authorities. Yet, the intangible fishery cultural is considered unofficial and valued more by the locals. The gap also reveals the distrust relation and power asymmetry between the heritage experts and local residents.

The narratives also reveal another factor in forming coalitions. NGOs and local community perceive themselves as having a weaker role in the heritage governance since their ideas are often neglected. Their pursuits of environmental/cultural protection are often considered second to the economic growth and development aims of the decision-maker.

Yet, despite their discontentment, the local community shows great dependence on the local council in decision-making regarding local development, whereas NGOs choose to cooperate with central authorities to get resources they need to achieve the goal of conservation. The prehistory between the NGOs and local council are preventing them from forming partnership. By paying attention to how these differences and similarities influence the stakeholders' interactions, the management body may get instrumental information in defining heritage management policy and heritage governance.

Considering the data from interviews, opportunities within PERICLES are considered in bringing together different stakeholders with different perceptions of heritage. The idea is to stimulate the cooperation and understanding between stakeholders and provide a working or space environment where all the voices are heard. In this case, PERICLES is already providing a workshop discussion and focus group in November 2020 which aims partly to contribute in this issue.

3.5   Estonia

Cultural heritage is understood as something that the community owns and decides about, but the policy is made by the state and therefore the monitoring is also done by the state. However, local communities have a capacity to preserve and promote cultural heritage, but it needs money, which is given to local NGOs by the local municipalities or by EU programs. The importance of the last was emphasised in the interviews. However, sometimes cultural heritage becomes too canonised, although it is naturally diverse and constantly changing. The canonisation can also be the result of policy making. The aspects of canonisation of heritage were mentioned in the interviews. It was one of the points most stressed by the interviewees: the biggest danger to cultural heritage is canonisation.

3.6   France

According to the interviewees and particularly the representative of DRAC (Regional direction for cultural affairs), global protection of maritime heritage does not exist in France. It is observed that

cultural heritage is little taken into account in national policies (e.g. MSP) and only policies implemented at local level do it (Interviews N05, N06 and N09).

The state can initiate a process to declare a cultural heritage element as a Historic Monument only in a case that it is representing a national interest. For example, ten Breton coastal lighthouses have been identified and classified as Historic Monuments at national level. The objective of such classification is to ensure the overall management of these sites. The same principle applies for the heritage of maritime defence, which includes the coastal castles of the 19th and 20th centuries. These cultural heritage elements are protected punctually by the State and its local services (regional and district) as Historical Monuments and are not resulting of a global reflexion (Interview N09).

DIRM (Interregional direction of the sea) representative explained that cultural heritage was little integrated into the implementation of the MSP. For them, the implementation of the MSP is complementary to current sectoral policies and requires coordination with other planning documents. The scale of the MSP implementation is too macroscopic to incorporate the built maritime heritage. However, cultural heritage is important from an economic point of view so heritage elements are inventoried in an atlas annexed to the MSP implementation documents (call strategic document / DSF in French). This applies mainly to all cultural heritage linked directly to maritime activities (lighthouses, sailor's shelters, mooring lines, landmarks, buoys, etc.) and natural activities (dunes, beaches, kelp forests, etc.). According to the interviewees, "the DSF is not the right planning tool to operate on cultural heritage" (Interview N06).

At the national level, environmental law does not allow strong protection of the natural heritage but suggests a useful labelling approach: "great site of France" (Interview N09). The Marine Natural Parks Act (MPA's) recognizes and classifies cultural (mainly built heritage based at sea as lighthouses) and natural heritage (kelp forests, birds and seals). Within the territory of marine natural park an inventory and classification of the heritage is carried out. This protection doesn't cover the entire French coastline (Interview N10) but other juridical instruments do apply such urban planning code, regional parks and others.

According to the representatives of the regional administration representing the state (Regional direction for the environment, development and coastal areas-DREAL,), the urban planning code is representing the best legal instrument for cultural heritage protection and in particular its Article L151-19 mentioning the content of local urban plans (Interview N04):

"The regulations may identify and locate landscape elements as well identify, locate and delimit neighbourhoods, blocks, built or unbuilt buildings, public spaces, monuments, sites and sectors **to be protected, conserved, enhanced or requalified for cultural, historical or architectural reason**s and may define, where appropriate, the requirements for their **preservation, conservation or restoration**". (Urban Planning Code, Book I - Chapter V - Content of the local urban plan).

But interviewees representing the various district administrations consider that the protection of cultural heritage is not part of such urban planning documents (Interview N05). Because local urban plans (PLUs) can identify elements of cultural heritage of interest but their purpose is not to protect them (interview N08). For DREAL representatives, this type of recognition within the PLU is not necessary and is left to the discretion of the local elected decision makers who implement these plans (Interviews N04 and N05).

Interviewed Architects of French Buildings (ABF) consider that France doesn't have a strong tool for sustainable protection of the maritime heritage, whether cultural, natural or intangible. This is true despite the different types of existing inventories (PRNGM, region, Ministry of Culture, districts, etc.) which are useful tools but very weak for protection measures (Interview N07).

For oyster farming activities, the representative of the District direction of territories and sea (DDTM) considers that the Article L21-23 of the General Code on the ownership of public entities, as the best tool for protecting the cultural heritage located in the public maritime domain (General Code on the ownership of public entities, Book I - Chapter III - Use of public domain and management methods).

In 2013, a "Shellfish Charter" was signed in the Gulf of Morbihan between state administrations based at district level (DDTM, ABF), the Conservatory for the shoreline (heritage), the local authorities and the shellfish farming committee of South Brittany. This document aims to protect built heritage associated with traditional activities taking place on the public maritime domain as is the case with shellfish farming. The charter ensures that buildings dedicated to shellfish farming will not become "secondary" houses for tourists (Interview N03).

3.7   Denmark

Cultural heritage features in both national and local (municipal) policies and planning activities in Denmark. In formal settings, in Acts and compulsory planning instruments and plans, cultural heritage is primarily understood in tangible and material terms, often related to the protection of buildings and physical assets. However, intangible cultural heritage perspectives are emerging in both national policy guidelines and municipal policy-making discussions (including inter-municipal discussions). Here, intangible cultural heritage is often discussed in relation to a rethinking and revitalisation of local development. Cultural heritage becomes part of discussions of local narratives and place identities. The purpose, in such primarily explorative settings, is most often to build more proactive strategies, plans and activities for housing, tourism and recreation.

Supplementary interviews with municipal administrators and planners have further revealed that, on the one hand, municipalities are searching for ways to broaden their perspectives on cultural heritage assets and their applicability in and potential for local development. On the other hand, smaller municipalities have a hard time finding time and resources (including knowledge and competence) for this among their employees. This often results in a propensity to stick to basics (e.g. the materially and architecturally oriented SAVE method) and/or to minor experiments only.

Also, local community actors (interviewees) are calling for more attention from municipalities to local identity and history, although in practice this 'call' typically shows in somewhat limited and pin-pointed projects/activities. Cultural heritage is not unknown as a concept to the local community actors interviewed, but it is also clear that there is a lack of a wider spanning perception. In practice, to local key stakeholders concerned with policy-making on local development, cultural heritage is 'in the grey' and a concept that is still primarily framed in terms of preservation and protection. On the other hand, there is also a distinct and positive interest in 'breaking away from existing paths', and here broader cultural heritage perceptions are welcomed 'if they can be of use'.

Through the last round of interviews, it became clear that PERICLES may be able to play a role in providing cultural heritage-oriented input and recommendations for specific local development processes in the Vilsund area and local/municipal policy-making activities. In the view of a leading municipal planner, collaboration with PERICLES could provide a 'pilot test/example to Thisted municipality on how to discuss and deal with cultural heritage in a coastal context – with the opportunity that this could develop into an approach that could be used in other coastal communities in the municipality'. This corresponds well with the general impression that the main bulk of innovation in Danish policymaking, governance and planning for place development can be found at local levels.

Here, it also became clear that PERICLES can help in expanding local views on understanding cultural heritage, and in particular on how to apply and activate such views in local development processes. It was made clear that adding to existing rather narrow material perceptions of cultural heritage is welcomed.

4. Policy Formation

The interviews were designed to gain insights into the processes of policy formation, providing details on good practice to share and common challenges to address. Adopting the same analytical framework as the policy analysis, they were analysed in terms of policy integration, dominant actors, stakeholder engagement, and delivery and monitoring.

The integration of cultural heritage in policy was described as ineffective in all of the contributing PERICLES regions. The basis for this criticism appears to be a series of inequalities that are often attitude-driven. Interviews in Northern Ireland, Scotland and Portugal revealed that some types of cultural heritage are integrated in policy, but not all are. This highlights inequality by heritage category in terms of what is viewed as heritage that ought to be included. Furthermore, in Malta and France the extent of integration was said to be dependent on the type of policy in question and will of the policymakers, indicating inequalities also in terms of individual policies. The outcome of the interviews in Portugal, Estonia, Denmark all express differences between the policy 'on paper' and in implementation, revealing inequality between policy and practice. Finally, one of the major barriers preventing inclusion of cultural heritage to emerge across the regions is the privileging of other issues over cultural heritage, particularly those directly concerning the natural environment or those with strong economic drivers. This bias towards other considerations is an inequality of significance attached to cultural heritage relative to other policy priorities. PERICLES is working to address these inequalities and improve policy integration by making policy recommendations as well as highlighting the value of cultural heritage and its situation in the natural and social landscape.

In terms of key actors and the role of stakeholders in the policy formation process, the dominance of top-down policy formation that was found in the policy analysis was echoed in the interviews. While all of the regions offer the possibility for stakeholders to be involved during the policy development stage, many interviewees were critical of the form and scope of the participation offered. Public consultation was confirmed as the main method of engagement but this was criticised as ineffective and often too late. In addition, Scottish and Northern Irish interviewees both suggested that some groups may experience barriers to participation. Estonian interviewees highlighted the difficulty in making participatory policy making suit all stakeholders, and this is the particular challenge in tackling the barriers to excluded groups. Danish interviewees expressed the need to develop better access to participation, particularly outside the standard official procedures, and to create an appropriate deliberative setting that goes beyond simply reaching out to people for their views. Local level policies in PERICLES areas were generally described as being more participatory than national level policies. The closer integration of local and national policy making recommended by one of the interviewees in Northern Ireland may be a pathway towards improving deliberative participatory policy formation. PERICLES aims to support deliberative participatory governance which will include stakeholder and citizen views on heritage in policy formation. In turn, this will also improve awareness of the value of CH to society and improve understanding of its place.

The delivery and monitoring of policies was an area of the policy analysis reported in Deliverable 5.1 that particularly required interviews to elaborate on. The majority of policies analysed contained plans for implementation but it is important to understand how these translate into practice after the policy is published. Danish and Northern Irish interviewees emphasised a lack of resources for

implementation, monitoring and evaluation, and Portuguese interviewees described a contrast between policies on paper and in practice. Deficits in monitoring were of particular concern in Northern Ireland where there was insufficient data to evaluate many indicators, and therefore no accountability for the implementation of policies and achievement of their objectives. In Scotland, while there is good monitoring of scheduled sites, a lack of monitoring of non-designated heritage was emphasised. Monitoring and evaluation is therefore a key part of the policy process that PERICLES can recommend for improvement.

The following sections provide summaries of findings from the stakeholder policy and practice interviews in each of the PERICLES regions, further describing the common issues as well as those specific to their area, and providing the settings for forthcoming work on PERICLES activities.

4.1   Northern Ireland

Policy Integration

The introduction of marine planning was viewed by all interviewees as a positive step in recognising and integrating cultural heritage in policy and planning. This move towards integration is also reflected in the recent publication by the Department for Communities Historic Environment Division of the *Conserving the Marine Heritage* position statement (2019). However, one interviewee from an NGO was critical of the new Draft Marine Plan's lack of integration beyond the surface level, viewing it as a collection of policies as opposed to a new approach: "It has always been a document – a collection of existing policies brought into one space… We still feel like it didn't really bring anything particularly new to the table. It's a document that will help developers look at what they need to consider when they make a licence application and I think that marine planning can do a lot more than that."

It emerged from the interviews that in practice, however, there has been integration of cultural heritage and marine conservation. It has been possible to integrate aspects of non-statutory historic environment inspection and monitoring duties into wider statutory marine conservation monitoring work. An example provided was the Girona designated wreck, which lies within a marine SAC. The Historic Environment Division have been able to incorporate licensed inspection dives in the designated area by the Marine Scientific Dive Team into wider marine nature conservation monitoring, leading to a better understanding of the site and its environs.

The Historic Environment Division also now works more closely with fisheries and marine licencing colleagues, with the government marine archaeologist being on loan to them. This helps secure tangible heritage benefits in terms of mitigation and better protection for undesignated heritage assets through consenting regimes. However, one interviewee from a government department would like to see further integration, with cultural heritage being included comprehensively with respect to the marine environment in other marine-related monitoring frameworks, such as the Marine Strategy Framework Directive and the emerging revised UK Marine Strategy.

Dominant Actors

The policy analysis suggested that in Northern Ireland, policy is typically led by the relevant government department or non-governmental organisation, and the interviews supported this. An interviewee from a Northern Irish government department explained that traditionally the UK government's Department for Culture Media and Sport, advised by Historic England, led in policy making in the coastal and marine cultural heritage sphere in the UK, with some trickle-down to Northern Ireland. They explained that the Department for Communities Historic Environment Division now has the potential to lead in Northern Ireland, but traditionally statutory work connected to terrestrial planning has taken precedence.

One of the interviewees from an NGO suggested policymaking should be dominated by a mixture of local and central government, with strong connectivity between them. Northern Ireland currently does not have a functioning central government, and planning has been moved to local government - a system in which our interviewee has less confidence as they perceive it to be less consistent in addition to being more lenient towards developers.

The role of experts in policymaking was discussed. The consensus is that experts are increasingly involved in policymaking and that research and evidence are very important. Evidence is viewed as particularly important in prioritising and protecting coastal and maritime cultural heritage, as one interviewee described:

"Evidence is pivotally important in prioritising or protecting coastal and marine cultural heritage. Designation or provision of statutory protection is based on programmes of research and site-investigations, and curatorial decision-making on the coast and marine area is based on lists of designated and undesignated heritage assets."

An employee of an NGO said that when they influence policy, it is mainly data and evidence driven. They are trying to use public opinion more, although it has not had much support in Northern Ireland in the past and evidence is perceived as more robust.

However, there was caution from another from an NGO that expert advice can be used as leverage to drive favoured policies, and that in such circumstances the advice might not necessarily be a complete view, or even accurate, simply because it is being spoken by an expert. In their words, "sometimes a project's being driven by the wrong sort of expert."

When it comes to the role of the public in policy formation, there were differing opinions. One interviewee claimed it was difficult for the public to drive policy: "It's difficult to influence a policy that doesn't exist. There are lots of times communities, I think, can find it frustrating because they can have an idea about something or we can see that there's something going on but if there's no policy background or if there's no driver it's difficult to get a change."

Another was keen to point out that there have been cases of the public driving policy, where local groups push things up from below, although this is less common and they could not think of any examples during the interview.

Another interviewee said that there was a much stronger focus on inclusivity now, that perhaps wasn't considered important ten years ago, and more ways people can become directly involved with their

heritage. They explained the need to make people feel like they have some ownership because "if they don't feel like they're connected to what you're trying to raise awareness of then they're not going to be involved, and if they feel like they have ownership of it then they'll feel like 'oh, this is important to me now' and I think that's maybe the key to it."

Community ownership was raised as a key requirement in heritage policy development by three other interviewees, with one stating that: "Raising the public profile of coastal and marine cultural heritage and imbuing a sense of community ownership and worth, both social and economic, for heritage assets is vitally important as this can lead to a greater level of public consultative response and strengthen the position of NGOs who might be campaigning for policy reform." Another questioned how much ownership people are given over their heritage, in particular when it is developed for the tourism and recreation markets and so economic circumstances are given priority.

Stakeholder Engagement

The policy analysis suggested that engaging stakeholders, including citizens, in policymaking has gained increasing importance in Northern Ireland. The findings from the interviews support the view that the increase in engagement directed by policies is taking place but, as with the policy analysis, questions were raised regarding the effectiveness of the methods in influencing policy.

An interviewee from an NGO told us that departments, such as the Historic Environment Division, are more approachable than they were ten years ago, when they very rarely engaged communities. This participant was satisfied that policymakers are much more willing to listen to people now and make changes on the basis of what those people think. Another from a different NGO agreed that government departments in Northern Ireland are easily accessible, something which they attributed to the relatively small-scale of Northern Ireland.

The majority of organisations and departments of all types are trying to engage more with communities. Some spoke of actively working with communities and local groups on heritage projects and to increase awareness of local heritage, while others are engaging them in their own policy formation or consulting them on national policy. One interviewee stated that including local groups as actors in policy formation is important because you need the local connection, otherwise what is happening at a higher level can be quite disjointed.

Public consultation and feedback exercises were specified as the principle means of shaping or challenging policy that is open to the public, although this was criticised by one interviewee from a heritage organisation as insufficient. Another from an NGO referred to consultation as frequently ineffective, as the document had already been written by that stage and it is very hard to get significant changes. They emphasised the need to get comments in early, although this may not be possible for all groups, such as small local groups or individual citizens.

A sense of cynicism towards the consultation process was expressed by members of NGOs. While they generally agreed it was an open route of access to policy making because public authorities are required to show good stakeholder engagement, one claimed they felt that on many occasions they were simply there to tick a box rather than to have their input considered. Discussing community engagement, another said: "I think most public authorities are pretty savvy to the idea that they need to speak to communities. Whether they listen to them, I don't know."

One heritage professional felt there was a barrier between people and institutions or local government and that there was not an obvious route for people to take unless they approach someone to get direction. Another, from an NGO, said that there was a local disconnect and a lack of awareness and caring about what is being lost.

Another interviewee from an NGO concurred, saying it is important to connect with communities more as it feels like this is missing. They felt that even though planning has moved from central government, it is still disconnected from people, and that community planning structures could be the way forward.

Delivery and Monitoring

The policy analysis showed a frequent lack of detail on how policy would be delivered and monitored, and this was an area in which it was hoped the interviews would prove especially informative. Interviewees were broadly negative about the monitoring and evaluation process. Two of the heritage professionals interviewed were unaware if there was any monitoring and evaluation taking place. Members of NGOs were more aware and were critical of the process. One said that here was not enough of it, it's not joined up enough and there is not enough awareness of it. Another sympathised with those responsible, saying the situation is due to a lack of resources for monitoring and enforcement work, rather than any fault of those currently working on it, but was concerned that it impacted on how they could follow the progress of policy implementation and hold anyone to account if progress was unsatisfactory.

One example given was the first review of the Marine Strategy Framework Directive. Many of the indicators for the Marine Strategy Framework Directive were recorded as 'not enough data.' One interviewee commented: "After 6 years we're still coming back and saying we don't have enough data and that's just not good enough… If the answer is just 'we don't know' you lose a lot of momentum and there's no clear answer with what you need to do next."

A novel suggestion was provided that gaps in the data could be filled with social monitoring which makes use of anecdotal data and perceptions, using the argument that "for monitoring it's about using the best data that you can get. Even if it's not exact survey data, you can still capture a lot of information." This would provide some understanding of the impacts of policy and have the additional benefit of involving stakeholders and citizens in the monitoring process, encouraging ownership and guardianship of their environment.

4.2   Scotland

Policy Integration

In Scotland marine cultural heritage is integrated within broader marine policy, which is beneficial at a national scale and for protected sites but works less well at smaller scales or for non-designated sites. While the Regional Marine Plans, that are currently being developed, are intended to address this, there lacks sufficient resources made available to the Planning Partnerships to encompass different areas of expertise or to develop unfamiliar methods. The academic community can contribute in this respect. However, a planning professional did feel that despite the difficulties, marine spatial planning

did have potential to better link terrestrial and marine planning (the coastal and the marine) "through consideration of landscape and seascape".

In the marine sector, it was pointed out that the implications of including heritage in the UK Marine Policy Statement were not yet fully recognised by all Government Agencies, so that while there is a provision for cultural heritage in policy documents, it has not yet fully influenced practice across all sectors which has even led to judicial review.

It was also strongly felt that natural heritage and the environment were given much greater prominence in policy than cultural heritage. Participants working in the heritage field were constantly advocating for greater recognition of cultural heritage, or the human dimension, in environmental policies which were consistently "stripped of human heritage", at least at the draft stage. This is indicative of how it is conceptualised as a specific and separate sector rather than as an intrinsic dimension of the natural environment. More specifically, two respondents referred to the fact that a large part of their work was, in fact, to argue for increased recognition of cultural heritage in environmental policies that impact or overlap with cultural heritage. For example, one heritage professional described how the 25 Year Environment Plan, which shapes UK environmental policy, "hardly mentions cultural heritage at all, especially in the sections relevant to the marine environment". One participant described efforts to gain recognition for marine cultural heritage in the definition of the marine environment adopted by the proposed Fisheries Bill. While the Scottish National Marine Plan does explicitly state that the impacts of fishing on heritage should be mitigated where appropriate, the argument being made is for a conceptual change and for definitions of the marine environment in policy to include cultural heritage. In Scotland, this is starting to change but progress has been slow and is dependent on cultivating relationships with counterparts working in different sectors.

A further point made by a heritage professional who works outside of, but in collaboration with, national agencies was that maritime heritage is also under-represented in relation to terrestrial heritage. Even where there was a provision of maritime heritage within national bodies this tended to have a smaller representation than is provided for terrestrial heritage. Maritime heritage was described as having a "double deficit", first in relation to natural heritage and second in relation to terrestrial heritage.

An interesting point made by a participating heritage professional was that the value or contribution of heritage is neither clear nor recognised in other policies that are not strictly related to heritage at first glance. For example, "how fishing heritage or other aspects of shared natural and cultural heritage such as language, come together to create a shared offering" that is then promoted through policies aimed to increase growth in other sectors such as tourism. In this sense, the broader value of heritage is difficult to capture and is therefore underappreciated. Another participant further argued that this lack of awareness reflected in policies is also a political lack of awareness that results in missed opportunities for public engagement and for a better appreciation of heritage and its value.

The Dynamic Coast project was discussed as a good example of collaboration across different sectors. This is a pan-government partnership brought together to address the common challenges of coastal change. As it is challenge driven at a national level rather than sector specific, it requires collaboration of lead bodies in a number of different sectors to be part of a common, forward-thinking response. The Dynamic Coast project is a good example of how "the most powerful work" can happen when

public bodies and other partners work in partnership from the outset which ensures that all aspects of the marine environment are inherently considered.

Dominant Actors

All participants identified national bodies as the dominant actors in policymaking. Marine Scotland was identified as the dominant player in developing legislative framework for the Scottish marine environment. The role played by HES in advocating for cultural heritage and its inclusion in and protection through the Marine Planning system was recognised, as was their advisory role in planning decisions, but they were not considered the dominant actor in policymaking. Other national bodies, such as Scottish National Heritage (SNH) and Scottish Environment Protection Agency (SEPA) that also feed into the marine planning and licensing system, were also considered important, if not dominant, actors as were regional and local authority archaeological experts, the Ministry of Defence who own wrecks and the Crown Estate through ownership of the intertidal zone.

Other important actors identified in this arena were funding bodies and developers who carry out work at sea although their impact was mainly through funding archaeological work that provided an evidence base rather than in policy development directly.

Participants who were heritage and planning professionals also identified the academic community as important, although not dominant actors. One participant described how the academic community was perceived as an important link in providing the research needed to inform the policy function of national advisory bodies. Another participant went further and added that academics were the main representatives of community interests in terms of what people value, which was linked to a point made by other participants about the growing importance of local communities in the community empowerment landscape. This is reflective of the gap already mentioned with respect to collecting evidence on locally valued heritage and locations. While HES are striving to change their approach to include this, it was perceived by a planning professional as not really falling within the remit of any national body.

Access to policy arenas was generally considered to be good in terms of the openness of national agencies. Professionals from different organisations described how they did routinely engage with national bodies although two participants did make the point that access did not necessarily result in policy change. There was also recognition among all participants that some stakeholders may experience barriers to participation because of limited resources.

Stakeholder Engagement

Policies are subject to consultations which are open to anyone who wishes to participate. There was a strong desire by responsible bodies to make the policy process more participatory and inclusive, whether this was for policy related to marine planning or to heritage more broadly. Participants described sustained efforts made by HES and planning partnerships to develop new ways of engagement and consultation; for example, to inform development of the Historical Environmental Policy for Scotland or of regional marine plans, although difficulties in reaching some stakeholders remain (e.g. in knowing who to approach for community representation). So, while there is a clear desire for and drive towards broader participation in policy development, all participants voiced concerns about achieving this in reality.

Heritage bodies saw it as their duty to not only represent their own interests but also to enable discussion and act as a conduit for other views. Two heritage professional participants described how it could be difficult for small or 3rd sector organisations to make their voices heard and to collate a coherent voice in a very fragmentary sector. Many organisations, and even individual experts, do not have the resources to engage in every policy consultation, which tend to be time consuming and technical, and therefore engage through representative individuals or through umbrella organisations. One participant observed that when this expertise was available within such organisations, it was usually focussed on terrestrial heritage and it was also noted how this stood in sharp contrast to better resourced organisations with an interest in the natural environment.

An additional potential difficulty is of developing good mutual understanding between stakeholders. Historically this has not always been the case and has led to some friction between organisations with an interest in the sector. While this is now much improved, it remains a potential pitfall in stakeholder engagement.

A major theme in the discussions and a concern of heritage and planning professionals was that of community engagement and participation, which is also part of a broader Government agenda. One participant argued that a failing of planning in general is that "civil society aren't really represented in a planning context". More specifically, there were no community representatives who were specifically engaged with planning which made it difficult to know who to go to, to capture the kind of evidence discussed earlier. This was echoed by heritage professionals. While there are structures of representation through elected individuals (e.g. community councils, local councils), it was recognised that they may not represent the views of the general public well in all contexts and there was therefore still a need for broader engagement. So, while planning and heritage policy developers are keen to engage with communities, it is not clear how best to do so; "who do you ask" was a recurring question in our discussions and the fact that "community input was a consistently weak link" was a key concern for participants despite concentrated and continuing efforts to improve this situation. One participant felt that the public did not tend to engage with development issues at sea in the same way that they might do on land, possibly because of a lack of visibility and/or a lack of familiarity with the marine planning and licensing system. Another point raised by two participants was related to understanding of 'community' to include communities of geography as well as communities of interest and if both could be engaged where appropriate, how then to weight potentially conflicting viewpoints.

While community empowerment is high on the agenda, participants described that it still takes time for this to have an impact on policy. One participant noted that when discussing policy change, we need to think of policy in two ways, policy in terms of written documents and policy in terms of Government policy. In other words, a written policy statement will only be effective in reality if there is political will driving its implementation, otherwise it risks being overlooked. All participants were of the view that the most effective examples of challenging or changing existing policy occurred when a group of people, whether a community or an interest group, brought pressure to bear on a political actor who then took up the case. "Politicians tend to respond to the public" so a policy change needed to be driven by public demand. Participants voiced two concerns about this, one was about the possibility of cultural heritage being 'misused' by groups to further a different agenda. The second point was about how things don't tend to be questioned until there is already significant pressure or risk of loss, in this way demand for policy change can be reactive rather than forward looking.

Delivery and Monitoring

Heritage professionals described ongoing efforts to monitor the Properties in Care (i.e. sites that HES have direct responsibilities for under the Schemes of Delegation). They also described how HES field officers carry out scheduled monitoring of Scheduled Monuments around the coast t(the majority of which are in private ownership), the results of which can then feed into the Marine Atlas. Marine sites tend to be protected through the creation of historic MPAs (rather than scheduling) and are monitored periodically and in tandem with the body responsible for natural heritage. This is done to establish whether progress against set objectives is being achieved. Evaluation of sites in care was also being undertaken but the evaluation process did not disaggregate coastal and marine sites from terrestrial ones so it was difficult to assess the economic contribution specific to them.

Participants raised the likelihood of increasing use of citizen science and engaged communities to help with site monitoring. This is already been done successfully by groups such as the SCAPE Trust (Scottish Coastal Archaeology and the Problem of Erosion) which runs the SCHARP (Scotland's Coastal Heritage at Risk) project. Efforts by Scotland's public body to assess and mitigate the risk from climate change to sites in their care are world leading and one participant expressed a wish to extend this to incorporate monitoring for invasive species on marine sites.

While monitoring of scheduled sites is good, other participants felt that there wasn't sufficient monitoring or evaluation for non-designated marine cultural heritage. One participant argued that this was linked to the larger problem of recognition of marine cultural heritage in marine policy. For example, the definition used for the marine environment in the UK Marine Monitoring and Assessment Strategy is based on that used in the EU Marine Strategy Framework Directive - heritage does not feature in 'good environmental status' in either document. The consequence is that heritage is left out of monitoring efforts which results in missed opportunities to make the most of progress in marine archaeology. Further, the participant thought that the monitoring metrics that were available for heritage were predominantly based on terrestrial heritage meaning that marine heritage was overlooked again: "the sea was grey, it had no value".

Another participant thought that this was related to a lack of understanding, especially with respect to CES, and a corresponding lack of data which makes it difficult to monitor impacts or to disentangle what was being impacted, how and by what/whom. This links to the concerns voiced throughout by another participant about lacking understanding and knowledge of the value of heritage, its impact on places and the risks that might be associated with that.

4.3   Portugal

Policy Integration

The tangible heritage is integrated in plans and strategies. Stakeholders interviewed have mentioned Coastal Zone Programs/Plans (POC's) and the municipal Master Plans (PDM's) at regional and local levels.

At the national level, the following were identified by stakeholders as integrating cultural heritage into policy: National Tourism Strategy; National Ocean Strategy; Maritime Spatial Plan; ICZM Strategy, operationalised through Littoral Action Plan XXI; Policy for Marine Spatial Planning and Management (MSP Law) of the National Maritime Space, which defines the Situation Plan and the Allocation Plans. The Situation Plan (PSOEM) has gathered inputs from a Stakeholder Committee, which has included an institution representative from the Ministry of Culture dedicated to Cultural Heritage (DGPC).

Some stakeholders mentioned that the only cultural heritage highlighted in the Policy for Marine Spatial Planning and Management (MSP Law) is sub-aquatic heritage, with the remaining missing, and saw that as a major flaw.

Others mentioned that although cultural heritage is integrated in some policies, they feel that it is only "on paper". They considered that, for the most case, cultural heritage is still not recognised as relevant enough to have concrete measures integrated into policy. They considered that in Portugal we have suitable legislation for cultural and natural heritage, but it is not so easy to implement it. The funding programmes are either not linked with the strategic priorities or are insufficient. The stakeholders interviewed highlighted the fact that high investments are needed to protect the natural and cultural heritage of the lagoon.

Polis littoral Ria de Aveiro - Integrated Requalification and Valorisation of the Coastal Border - has carried out a set of operations to requalify and valorise the high-risk areas and degraded natural areas located along the Aveiro region coast. This programme was mentioned as very important when it comes to some interventions, such as in the dikes of the traditional saltpans and piers. The programme enables the maritime tourism activities, which contribute to the rehabilitation of traditional boats and the boat industry overall.

Dominant Actors

In Portugal, as mentioned in Deliverable 5.1, top-down approaches prevail in policy making, particularly at the national level. Most national and regional policies are dominated by the departments responsible for them.

More recently, inter-sectorial consultation boards/ Stakeholder Committees are being involved in the design/development of policies, to promote more integrated approaches. An example of this is the Situation Plan (PSOEM) (Despacho 11494/2015).

At the municipal scale, and in the context of the ClimAdaPT local project (elaboration of municipal strategies for adaptation to climate change), participatory governance and stakeholder engagement took place through a series of local workshops, involving a wide range of participants. There was an overall concern to incorporate stakeholders' inputs/discourses in the municipal strategies elaborated in this project.

Particularly concerning the regional/local cultural heritage, municipalities are the dominant voice, namely through municipal museums, as mentioned above.

The Aveiro Lagoon case-study region integrates 11 municipalities surrounding the lagoon, 5 of them coastal. The lagoon does not yet have a management entity, and this was mentioned by stakeholders

as one of the main problems with the management of the lagoon. It has instead several entities taking decisions regarding the uses and activities in the lagoon, which include:

<u>At the National scale, the </u>Portuguese Environmental Agency (APA-ARH), the Ministry of the Sea, Directorate of Natural Resources, Security and Maritime Services (Ministério do Mar - DGRM), and the Institute for Nature Conservation and Forests (ICNF).

<u>At the Regional Scale, </u>the Centre Region Coordination and Development Commission (CCDR-C), the Association of Municipalities of Aveiro Region (CIRA), the five Coastal Municipalities of the Ria de Aveiro Region (Aveiro, Ílhavo, Vagos, Murtosa, Ovar), and the Aveiro Harbour (APA).

Stakeholder Engagement

Stakeholders' engagement in the Aveiro lagoon region includes diversity of approaches. The National Tourism Strategy 2027 had a public process of participation with the promotion of: a) technological platforms; b) focus groups and c) strategic laboratories of tourism. The stakeholders involved in this Strategy included: tourism operators; travel agencies; opinion leaders; sectorial associations; media; learning institutions; companies; regional tourism entities; public and private entities and business associations.

The National Ocean strategy and the Maritime Spatial Planning were defined in coordination with the Focal Points Group of the Inter-ministerial Commission for Maritime Affairs (ICMA) and the Directorate-General for Maritime Policy (DGMP).

The Situation Plan (PSOEM) gathered inputs from a Stakeholder Committee, which included a representative from the Ministry of Culture dedicated to Cultural Heritage (DGPC). This Plan has undergone two public consultation stages and is about to be published as a Decree-Law.

The ICZM Strategy, operationalised through the Littoral Action Plan XXI, has integrated a team of experts.

The Coastal Zone Programs/Plans (POC's) were elaborated by a team of experts and monitored by the Directorate of Environment and Planning and by the National Institute of Nature and Forests in their respective jurisdiction areas. The several Estuary Plans (including the Aveiro Lagoon) were elaborated by the Portuguese Environmental Agency (APA-ARH), and the municipal Master Plans (PDM's) were designed by the municipalities. All these plans have had a public consultation process.

The urban canals regulation for the Aveiro municipality is managed locally, by the municipality as a result of a protocol with the Portuguese Environment Agency.

In addition, the following aspects were pointed out by stakeholders during the interviews:

⸺ The Ria de Aveiro municipalities (i.e., the 11 municipalities in the Aveiro region) are joined into an intermunicipal body (CIRA). CIRA has defined the strategy for the Ria de Aveiro brand, which also includes coastal and maritime cultural heritage;
⸺ The harbour of Aveiro has collaborated with the Directorate of Heritage for the Barra Fort area, since it is a classified heritage site. Other partnerships between the Harbour and the

municipality of Ilhavo also include the Codfish fishing boat museum, the formed cod vessel Santo André;

— The Ilhavo Maritime Museum has several activities to engage the local community and to promote the "Codfish community pride", as mentioned by one of the local politicians.

Delivery and Monitoring

As mentioned in the previous sections, in Portugal, at the national and regional levels, policy is typically led by the relevant governmental departments (top-down approach), often in response to (European) legal or policy requirements and is designed for integration with existing policy.

In terms of risk, resilience and adaptation, in Portugal these questions are only addressed in Climate Change Adaptation Strategies and Plans, both at national and regional/municipal scales. However, these do not have a cultural heritage focus.

Regarding policy implementation, some of the stakeholders interviewed have mentioned that the teams responsible for policy design should be aware of the importance of giving priority to cultural heritage preservation and promotion of cultural heritage and, thus, promote the link between the strategies and the funding programmes. Also, it was mentioned that these teams should include at least one cultural heritage expert that would contribute to this objective.

4.4   Malta

Policy Integration

Drawing from the interview data, it is possible to see that cultural heritage is well-linked to tourism development, at local and national level. Tourism is an economic incentive for growth and heritage is perceived as an important element to develop tourism. We will not discuss the development plans here but there is no unified vision on how to integrate cultural heritage and tourism, as some stakeholders want a more integrated approach with the environment (natural heritage) while others just want to be strictly linked with tourism and hospitality for more economic growth.

There are polices that aim to integrate marine areas and tourism development where heritage is placed. According to the Plan Authority (PA), everything is interconnected. However, since there is more awareness and concern on how development affects the environment, policies and strategic plans such as the MEPA have been designed. The aim is to segregate environment and resources from the PA and work together with the PA instead, to put policies and address environmental issues in marine areas such as the industrial fish farms which cause an impact on the coast and water quality. Other policies might be related to interlinked emerging economic activities such as yachting, to ensure that protected areas are not abused or policies to encourage the restoration of historical buildings into boutique hotels, as an example of integration within hospitality.

Dominant Actors

In the case of Malta, or specifically the fishing of Marsaxlokk, there are policy-makers and actors who have a bigger role and say in designing policies. Ministries have the biggest influence, as they

represent the democratically elected government. However, there are specific departments and agencies that also have an important influence in applying policies and also providing feedback and expertise that might be taken into account when setting policies. The Planning Authority (PA) with several sub-departments has influence in every sector, including the ones that involve our case and the PERICLES heritage project, such as culture, tourism, environment, economy or education. In terms of heritage, the PA has for example a special department to deal with heritage issues. The PA is the technical stakeholder in charge of restoring and advising heritage sites. This advice is linked to the Superintendent of Cultural Heritage, who has a "master" power in ensuring that policies are designed and applied appropriately to ensure the preservation of the Maltese heritage. Other important actors are the tourism-related operators and the heritage experts such as Heritage Malta. Although they don't have a direct participation in the policy-making process, their influence is big enough to define some aspects of the policies.

As we can see, through the interviews it is possible to feel a power asymmetry in heritage management. Although the management level remains local, there still a lot of disputes and different opinions on how to use heritage for economic development. Those who support aggressive development of tourism or are seen as heritage experts through special institutions, together with the political climax, receive much more support than others who are not yet visible, such as ENGOs or the local community.

Stakeholder Engagement

Stakeholder engagement in Malta takes places at different levels, for different reasons and during different stages of the policy-making process. As previously mentioned, important actors within the government, mainly ministries at national level, are the ones who, together with special departments and expert advisors such as the PA or Heritage Malta, discuss together the actual policies.

These policies are also often consulted at local level – municipalities or local NGOS – when the policy has a direct influence in the area. Community members are consulted by the agency and experts at a later stage, once the decision is already taken. They allow anyone to comment and express their disagreement. If the comments or additions are rejected, the PA has to provide the reasons why it wasn't included.

Community consultation is possible by providing the public a platform where they can voice their opinion. This is a platform set by PA to allow community members, by email or messages, to express their opinions. As community, you can attend the moment of decision as well and you have the right to speak. For this reason, discussions can even take 8 hours before everyone is heard.

At a practical level, there are examples for buildings and historical sites, where the planning authority discusses first if restoration or preservation is needed and then in a second stage, the owner of the building and the neighbourhood gets informed. They report to the municipality and through different communication means such as newspaper and the owner can always decide what to do in the end.

At a local level, it was possible to examine participatory governance during the fieldwork in November 2018 which allowed to better understand the stakeholders engagement in two cases of Marsaxlokk using different schemes including participation ladder, stakeholder analysis and social learning framework. XrobbL-Ghagine Nature Park project was initiated by NTM, a natural conservation NGO,

aiming at protecting the natural heritage in the area of Xrobb L-Ghagine peninsula by promoting eco-heritage-tourism at Marsaxlokk. Sharing the same vision of promoting eco-tourism, central authorities and tour operators formed partnership with NTM. The power and resources were redistributed through multiple negotiations among stakeholders. The local council of Marasxlokk, on the other hand, initiated the waterfront regeneration project. The project aimed at sustainable heritage tourism through rearranging waterfront spaces to different community groups and redirecting tourists from waterfront area to the two peninsulas. Local communities including restaurants, hawkers and residents were invited to co-plan and advise the project. In both cases, power and decision-making responsibilities were partially shared with the local community groups and the NGOs. The negotiation among the participants could be seen as a dynamic process of social exchange. Yet, the empowering of the weaker actors did not facilitate the participatory process. The distrust relation between local council and the NGOs, as well as the distrust relations between indigenous residents and NGOs resulted in insufficient communications, misunderstandings, and mostly only informing between two projects, whereas the two projects shared the same ideas of connecting heritages from the village with peninsulas to promote sustainable heritage tourism in Marsaxlokk. Three major misrepresentations of the narratives by the discourse of sustainable heritage management revealed the possible sources of distrust relations and conflicts among the stakeholders that impeded the participatory process. These were: diverse heritage definitions and accompanied concerns; access barriers between official and unofficial heritages; and different interpretation of place attachment and communal ideal. The linear relation suggested by the ladder of participation, and the needs identified by stakeholder analysis turn out to be too simple and rigid to consider the other elements in comprising the concept of participation. Sustainable heritage management in Marsaxlokk exhibits the characteristics of interdependency, complexity and uncertainty that urge the roles, responsibilities and purposes of those involved in the participatory process to be re-conceptualized as a process of social learning about the nature of the issue itself and how it may be progressed. Building platforms for nurturing capacity of social learning to facilitate dialogues and trust among participants are considered a way to reach better quality of participatory governance in Marsaxlokk. In that sense, PERICLES has already included a workshop in November 2019 to address some of these challenges.

Delivery and Monitoring

The Planning Authority covers all domains in executing policies and providing feedback back. The stage agency follows policies from different ministries. There other executive bodies within tourism, transport and fisheries who also monitor Marine Heritage related (directly or indirectly).

Most of the policies are designed and planned at national level, with consultation of experts for each of the sectors, depending on the policy and case. There is a Local Government Good Governance (LGGG) working group composed of local government key stakeholders which aims is to discuss issues relating to improve local government functions and operations.

There are departments in the Planning Authority which act as guards for individuals and private heritage, while the Superintendent of Cultural Heritage looks over the public domain. Yet, both follow decisions from the national government.

PA also has a strategic planning unit, doing research – demographic trends, economic, and what are the requirements of the different ministries. They look at other policies, try to bring everything together and give advice on those policies.

Relations between national and local government are both formal and informal. Although the creation of the LGGG seems to bring the actors closer, not all the formal policies are equally implemented at local level and therefore, more cooperation and understanding between local and national level is needed. One example is the fish market in Marsaxlokk, where according to informal conversations with the Mayor, national policies in terms of commercial uses and ports affect the Marsaxlokk waterfront in a way that is disorganised and misusing the community space. The local government is not completely satisfied and more consultation and discussion between both levels is needed in order to tackle the real issues with the involvement of the community as main users of the space on a daily basis.

4.5   Estonia

Policy Integration

It is becoming a trend more and more that cultural heritage is used in tourism. However, this might lead to canonisation of heritage. Estonian heritage is multi-fold and during its forming times in the 19th -20th centuries it was in constant change. But today when heritage is used in tourism and different features of it are "branded" more and more, the diversity seizes to exist, for it is much more convenient to brand cultural heritage which is canonised and has certain common features.

Cultural heritage is also used in the maritime spatial planning process however, the interviewees rather think that acknowledging the heritage would not change much as a result of the maritime spatial planning process, but rather helps to lose the diversity of the heritage. It was also mentioned that MSP is only for business purposes and does not much deal with acknowledgement of cultural heritage among the wider public. Considering the MSP process in Estonia from the National Heritage Board's point of view, this statement can be agreed with.

Dominant Actors

The main message from our interviewees was that policy making is in the hands of different stakeholders: the state, local municipalities, entrepreneurs and local communities. The role of local communities was emphasised in the level that as the heritage belongs to the community then there is no main decision maker, but decisions are made together. A very important thing mentioned in several interviews was the policy making in financing of cultural heritage. Thanks to different financing programs it is possible to develop preservation and promotion of cultural heritage in small communities (like Kihnu in Estonia).

Stakeholder Engagement

The Estonian maritime spatial plan is a good example of participatory policy making. Local NGO's, government administrations, local municipalities and entrepreneurs were engaged in the discussions. However, prevailing opinion in the interviews is that this plan does nothing in the field of acknowledging cultural heritage more, but is about business only.

Another example is compiling the new Estonian heritage conservation act. Stakeholders participated in that, but the result is rather confusing and nobody is happy. So maybe the threats of participatory

policy making are that it is very difficult to make it suit all stakeholders. In the end, the act is made to protect cultural heritage but in order to satisfy different stakeholders, this function is weak in some areas (e.g. cultural heritage that is not discovered yet and comes up during excavation works).

Delivery and Monitoring

Policies are implemented by local municipalities. The role of local municipalities is not to decide, but rather to support the practice of culture by financing different NGOs and their activity, and promoting local culture by making booklets etc.

The role of National Heritage Board is to implement heritage conservation act. To implement certain paragraphs, the board also has financial support for owners of cultural heritage objects (mainly national monuments).

4.6　France

Policy Integration

Interviews highlighted the complex relationship between the various public administration on the issue of maritime heritage. Three major regulatory entities carry out actions on the coast (DREAL, DDTM, DRAC-UDAP), in addition to the municipalities and other public authorities with an interest to the same area (CDL, PNRGM, etc.). Often each of them promote different maritime heritage issues. Each administration has an impact on the heritage protection and its valorisation processes differently according to their own policies and interests. Oppositions between services therefore exist.

The following example will illustrate how all these administrations are acting in the field. Bono, municipality in the Gulf of Morbihan, is well known as the historical home of oyster farming. Many oyster aquaculture infrastructures were abandoned and with time they were degrading. Substantial work was necessary to take the decision what to do because different visions were confronting: the ABF who wanted to preserve and restore oyster farming infrastructures, Members of the municipality who wanted to develop the local economy and tourism, and the DDTM who wanted to remove infrastructures in accordance with French law on the DPM. Finally, to preserve this maritime heritage, an educational path dedicated to oyster farming has been developed and placed under the responsibility of the municipality (Interviews N04, N05 and N07). This example shows that each actor wants to preserve its own competencies and preserve the interests of its administration but at the same time that it is possible to find a solution if all parties accept to sit at a common table and discuss.

Dominant Actors

The interviews highlighted the plurality of State services and public authorities directly or indirectly involved in maritime heritage management policies, whether cultural, natural or intangible. The integration of maritime heritage will be more or less important depending on the stakes and policies involved.

The DIRM will develop the maritime spatial planning documents at large scale (e.g. DSF for North Atlantic-West Channel, Est Channel-North Sea and Mediterranean. These documents do not have the

objective to protect maritime heritage but as their socio-economic objectives are sufficiently large that they can integrate maritime heritage protection and then be articulated with regional action plans (State-Regions plans, territorial climate-air-energy plans, etc.) (Interview N06).

Planning legal instruments (urban planning documents, PLU, SMVM, SCOT, etc.) are mainly developed at smaller scales (district or local). The DDTM is the representing state for all issues related to the Public Maritime Domaine (DPM) during the development, implementation and monitoring of PLU, SCOT, urban planning documents, DPM management, shellfish Charter, etc. (Interviews N04 and N05). The level of integration of maritime heritage within all these instruments varies according to the stakes (Interview N05). The DDTM also develops the Coastal Management Scheme (SMVM) and collaborates with the Regional Natural Park (PNR) to define objectives and associated regulations. Regional Natural Parks constitute the link between local and the public (state) authorities. For example, the Golf of Morbihan the Natural Park (PNRGM) facilitates the dialogue among different stakeholders. The Charter of PNRGM sets out a set of objectives for territorial development as well actions to be carried out along several axes. The first axis is to make heritage an asset for the territory. Municipalities can adhere to this Charter and follow the park's recommendations during the elaboration of their planning instruments as the PLU (Interview N08).

DREAL takes into account the maritime heritage through the implementation and monitoring of process related to registration and classification of sites in collaboration with the Ministry of Environment, Members of Municipalities /or site owners. They prepare the files, study the classification/registration proposal and ensure the follow-up of the site with the manager (often municipality) (Interview N02). They work in relation with DRAC, which will support the municipalities in applying for grants to protect their maritime heritage. In close collaboration with the ABF, DRACs will also monitor Historic Monuments (collaboration with the Ministry of Culture) and ensure the regulatory protection of the built heritage and restoration or maintenance work carried out on the sites. Unlike other regional administrations representing the state, heritage enhancement is a major stake for DRAC (Interview N09). DRAC actions, at district level, are carried out by UDAP (district unit of architecture and cultural heritage) which ensures the preservation and enhancement of certain protected areas such as Remarkable Heritage Sites (Interview N04). Within UDAP, the architects (ABFs) will monitor Historic Monuments and issue advice on urban planning projects which can be more or less restrictive: simple advice or assent advice. In the case of assent advice notice, the authority issuing planning authorisations (mayor, prefect, etc.) must necessarily follow the advice. According to one architect interviewed, their profession "is governed by 3 [main points]: conservation, control and advice". Architects contribute to the conservation of monuments, the control of protected areas (Historic Monuments and Remarkable Heritage Sites) and the advice of local elected representatives when preparing their planning and urban planning tools (Interview N07).

Stakeholder Engagement

The engagement of stakeholders and their degree of involvement in policy development strongly vary from one policy to another. The implementation of the MSP, for example, is carried out by DIRM in consultation with the members of the Coastal Maritime Council, regional sea, (CMF), which groups different stakeholders: representatives of the State and its public organisations, local authorities, representatives of professional activities, companies and employees working in marine resources exploitation or using of the sea and the coast, and representatives of associations for the protection of

the environment and sea and coastal users. The issues framing the maritime spatial planning instruments are defined in consultation with the administrations representing the state (DREAL and DDTM) and others public organisations (CEREMA) before being presented for stakeholder's consultation. Working groups or committees with limited members draft the planning documents before to be submitted for public consultation.

In 2019, public and stakeholders' consultation allowed the integration of culture heritage to the MSP document. Thanks to the received comments, floating maritime heritage, cultural and nautical events and water racing routes were taken into account (Interview N06). Associations working for the protection of maritime and cultural heritage are not present in the Coastal Maritime Committee (CMF). The heritage is indirectly taken into account by the Conservatory for the Shoreline (heritage) and Members of local authorities. This lack can be explained by the fact that "the DSF is too wide [and] the architects (ABF) intervene only on specific elements" (Interview N06).

According to the interviews with the administrations representing the state (DREAL and DDTM), the maritime heritage protection policy is historically belonging to the state. However, more inclusive approaches are being conducted with municipalities and citizens through consultations and public consultation (Interviews N02 and N04). Users associations and citizens can also make suggestions for the registration and classification of sites. The final decision is taken by the administrations representing the state at district or regional levels and depends on the general interest (Interview N02). Stakeholder involvement in decision-making has been strengthened by the Law on freedom of Creation, Architecture and Heritage[1], which claims some type of public consultation (Interview N07).

"Remarkable heritage sites are classified by decision of the Minister in charge of Culture, following the consultation of the National Commission for Heritage and Architecture and a public consultation conducted by the administrative authority, [...] and, where appropriate, consultation of the concerned municipality or municipalities". Article L631-2

"The regulations of the area related to the enhancement of architecture and heritage or the area for the protection of the architectural, urban and landscape heritage may be amended [...] after a public consultation [...], and after consultation with the architect of the French buildings (ABF) and with the agreement of the State representative in the region (Prefect)" Article 112

According to the architect (ABF), remarkable heritage sites constitute a "French exception". They are effective tools in terms of maritime heritage protection but are difficult to implement (Interview N07).

According to the different interviewees, local planning and urban planning documents (for example the PLU) are also subject to public consultation (Interviews N08 and N09). Citizens are generally well informed about the implementation of these investigations and also that the rules to be taken are governed by the Environmental Code. According to the DRAC representative, protected area planning documents are "well enough established and well enough written for the public to understand the impacts produced by a classification" (Interview N09). The regulatory obligations of the Environmental Code make information easily accessible and available even if "in many cases, no one is presenting" during the public consultation (Interview N09).

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[1] Law n°2016-925 to 7 of July 2016 related to freedom of creation, architecture et heritage

In the case of disagreement between administration and citizens (e.g. voluntary destruction of oyster sites by the State administration, downgrading of classified sites due to lack of maintenance, definition of the perimeter of a remarkable heritage site, etc.) stakeholders may contest the decision through associations created for this purpose (Interview N07). Contests can help the modification of the project even if state administration "has the last word in the implementation" (Interview 08).

Delivery and Monitoring

The integration of maritime heritage into maritime spatial planning (MSP) policy is quite low. According to the DIRM representative: "the DSF is not the right planning tool to intervene on culture heritage" (Interview N06). For example, intangible heritage is not taken into account except in the case of "small-scale traditional fishing, which is usually used as an excuse to justify the need for non-restriction in certain fishing areas" (Interview N06). An atlas of cultural and natural maritime heritage is annexed to the MSP implementation document (DSF) and concerns above all heritage elements directly related to maritime activities (lighthouses, sailor's shelters, mooring lines, landmarks, buoys, etc.) and natural (dunes, beaches, etc.). It brings together in a single document the "grands sites" of the territories (North-West Channel North Atlantic coastline) as well as certain classified sites of touristic and economic interest. The evolvement of maritime heritage cannot be assessed through the DSF because there are no indicators or specific monitoring related to it (Interview N06).

DSF presents maps (called "vocation maps") which are bringing together the environmental and economic stakes of each geographical area. The vocations maps are integrated for example into the SMVM of the Gulf of Morbihan. The SMVM is monitored by the PNRGM, the DDTM and Members of municipalities. Its implementation aims to better integrate the coastline into local planning documents and resolve conflicts inherent in heritage and landscape. However, SMVM is often not well implemented into local urban planning documents and only few are found in France (Interview N01).

PLU can include some heritage elements of interest but the Members of municipalities tell that the registration of the maritime heritage to the PLU does not translate to an effective protection. Registration/Inscription offers the possibility to highlight a heritage element of interest but does not enforce any regulatory or legislative constraints to ensure its protection or maintenance (Interview N08). The DDTM also mentioned the existing confusion between the notions of coastline and Maritime Public Domain (Interviews N04 and N05). The use of a heritage element, for example an oyster farm, located on Maritime Public Domain requires two specific authorisations: the first concerns the authorisation for temporary occupation (AOT) of the public maritime domain and need an authorisation issued by DDTM; the second concerns urban planning rules which requires an authorisation issued by the municipality. "This double entry generates confusion that can slow down the procedures for the maintenance, rehabilitation or destruction of certain heritage elements" (Interview N04).

According to the civil servant in charge of inspection of registered sites, their "contributions to planning documents are low" (Interview N02). They contribute to maritime heritage protection by carrying out an inventory of the sites to be classified and registered with the support of DREAL. This list defines at district and region levels and is based on the criteria for classification or inscription defined

by the Law of 1930 "on the reorganisation of the protection of natural monuments and listed sites"[2]. At the Gulf of Morbihan level, most site classification procedures fall under the "picturesque" criterion and the inspector of the sites estimates them between 80 to 90%. The processes of filing and registration vary between 3 and 10 years and are depending on citizen and association appeals and regulatory adaptations. The first year is dedicated to the study (technical field work, historical researches, study of archives, etc.); the second year to the consultation processes; and the third year, to the implementation of institutional processes (presentation to the district committee of sites, to the higher commission, validation by decree in the State Council, etc.) (Interview N02).

According to the Architect, the heritage elements of interest can be under the responsibility of two ministries that "do not always have the same interests" (Interview N07). The Ministry of Environment for example is responsible for listing and classifying sites. The Ministry of Culture is responsible for historic monuments. The Architecture notices that the majority of the choices made by the Ministry of Environment "are in favour of the restoration of the natural character of the landscape and thus to the detriment of the heritage" (Interview N07). Despite the apparent lack of regulatory consistency in the identification of sites of interest, the architect mentioned a network of Architects at the district and regional levels searching to transmit knowledge and "to share a "culture" of the service [that] makes possible to identify local stakes" (Interview N07). ABF also recognises that the consideration of maritime heritage in local policies depends strongly on political will and ambition. The Gulf of Morbihan is a special case because three prefects (State representatives) had had very different ambitions with regard to the protection of maritime heritage (Interview N07).

Procedures may constrain also by fears related to the protection perimeters of culture heritage because it can influence the urbanisation and economic development of the cities. This is the case in Lorient city where the heritage of World War II is not yet recognized (Interview N09).

4.7   Denmark

Policy Integration

Despite having significant 'planning powers' municipalities tend to feel somewhat left alone with the responsibility to deal with cultural heritage aspects, and often with too few resources to do so. Moreover, the distance between the national level and the municipal level is considered significant in terms of knowledge and competences. Even though the municipalities, at least in principle, are satisfied with the abandonment in 2007 of counties as regional intermediaries, and especially as prominent land use regulators, a municipal planner expresses some nostalgia concerning 'the good analytical competences of the former regional planners dealing with cultural heritage aspects'. Prior to 2007, regional planners dealing with cultural heritage aspects had better insight (compared to national authorities today) into local conditions and were often considered quite supportive for municipal cultural heritage-oriented planning activities.

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[2] Law of 2 May 1930 related to reorganise the protection of natural monuments and listed sites of an artistic, historical, legendary or picturesque nature

On the other hand, the above-mentioned example of the west coast partnership between 11 municipalities show how municipalities are themselves, in collaboration, trying to fill in some of the regional level policymaking and policy guidance gaps indicated. This partnership is interesting because it actively tries to establish a coastal policy between many municipalities that takes into account different local conditions and opportunities, also concerning cultural heritage (although this is a minor focus in the reporting from this partnership).

In terms of sectoral integration, this is in principle in place through the municipal plan, where the municipality is obliged to integrate environmental, housing, business, agriculture, tourism, cultural heritage, etc. concerns (up to 27 themes) in its land use planning. However, sector planning continues to be a challenge in municipalities, and getting responsibility for more sectors after 2007 did not make this easier, especially for smaller municipalities. In practice, housing, business, tourism, infrastructure, public and private service and environmental concerns are continuously the dominant policy sectors. Here, cultural heritage is considered an add-on perspective and theme that rarely becomes central to such sectors. However, and as indicated above, when in 'experimental mode' the municipalities see and test opportunities in using cultural heritage for renewed local development.

The Museum leaders push for more cultural heritage policy integration across sectors. They express satisfaction with the compulsory collaboration with the municipality (as stated in the Museum Act), which ensures an archaeological role for museums concerning infrastructure and building activities. However, the museums would like to expand this collaboration experience into broader cultural heritage perspectives, and they sometimes find that the municipalities are reluctant to see opportunities in doing this.

In addition, the interviews clearly revealed a common recognition among all parties; that there is a lack of territorial integration in policymaking and planning activities for places and areas. Municipal plans still only show what is going on inside the municipality – neighbouring municipalities are simply blank or grey areas on maps. There are examples of more transboundary approaches when municipalities perform analysis of places, however this is not dominant, and the interviewees were in agreement that there is a need for more transboundary analysis and policymaking. Here, cultural heritage is considered an obvious case and opportunity. Moreover, the museum leaders also clearly expressed a need for them and their museums to think outside their own jurisdictions. Recent examples show the museums collaborating between them to discuss historical traits, cultural heritage aspects and place identities in larger areas – and the museums see significant potential in expanding such types of collaboration.

Finally, in localities such as Vilsund there is a lack of both territorial and sectoral integration between bottom-up strategies and plans in the area. There are quite a few new strategies and plans in the Vilsund area dealing with various activities, both a holistic master plan (although only concerning part of the area) and specific/sector-oriented concerning for instance housing, recreation and water sports, etc. This can partly be explained by the fact that the Vilsund area is split in two, physically by the sound, but also by a municipal border (through the sound). Despite increased shared functionalities as well as collaboration and joint organisation across the sound in recent years, there is still no shared strategy or plan for the area.

Also, cultural heritage aspects are weak in those strategies and plans, mainly because the area has few obvious physical and material expressions of cultural heritage. This is, according to the interviews, in contrast to a rich immaterial cultural heritage in the area.

Dominant Actors

It is clear from the interviews that local museums are actively trying to influence policy-making activities in municipalities into becoming more active in local story-telling, including near-past histories and narratives. One local museum, Museum Thy, tried to demonstrate this by building up a new and explorative local knowledge-based (and based in local museum archives) analysis of the village of Bedsted. Here, a range of social aspects, and in particular the history of various local community associations, was added to more traditional material cultural heritage oriented analytical variables. This and similar initiatives have not yet had the intended/hoped impact on municipal policies and plans.

However, municipal administrators and planners claim that this is currently (in the last few years) in a process of change. It is partly due to a shift in local political attention towards 'local / village / place qualities and identities' (inspired by broader political trends), and partly due to a shift in personnel (e.g. municipal planners and development consultants) that brings in new competencies in municipal organisations. In addition, one municipal planner mentions that the municipality increasingly receives input from citizens (individuals and as groups) concerned with various cultural heritage-oriented aspects (also immaterial), hence indicating examples of a bottom up policy-making pressure concerning cultural heritage aspects.

Stakeholder Engagement

Municipality stakeholders have been identified by looking into the distribution of sectors, roles, tasks and competences in the municipal administration – in search for people responsible for place development and planning as well as for integration of cultural heritage aspects into this. In practice, talks and emails with several persons have been used to triangulate and find relevant stakeholders.

In local communities, namely in the Vilsund area, a similar triangulating process has been applied, however based on a longer duration and more extensive approach to approximately 15 people. It has been central to identify key local stakeholders among them that look beyond singular interests. Also, a criterion of representation of different types of collective and community-oriented interest have been applied.

As indicated above, there are a range of participatory activities already in place. At the municipal level and concerning the museums, such activities are based on professional and sometimes formalised stakeholder relations and networks. In relation to cultural heritage, those participatory activities are rather narrow. Here, there is scope for increased dialogue and deliberation between a wider representation of views (and sectors). Also, there is scope for developing better access for the public to provide cultural heritage oriented input for such activities, before new proposals are presented, and not just as part of official hearing procedures.

At the community level, again focussed in Vilsund, the impression is rather different. Despite fragmentation in activities, it is clear that there is a rather varied range of outspoken stakeholders and

a widespread local dialogue on development issues that seems to leave no one behind. There is high number and level of stakeholder engagement, open debates and arrangements in the local community. Self-organisation is the main basis and mode of local policymaking, and community activities and public meetings often lead to more than 100 participants (out of approx. 900 inhabitants in the Vilsund area). Municipal policies are often challenged in those settings – not just in reactive terms but more often as expressions of proactivity and community-led entrepreneurship, e.g. because the local community often manages to find external funding on their own. As a consequence, the municipalities often find themselves as participants in those settings, and as an implementing party rather than initiator. There is significant scope for using this culture for local discussion and collaboration in debating the integration of cultural heritage aspects into local development activities. The challenge is not to 'reach out', but rather to create an appropriate deliberative setting, that both respects main positions in the area and also becomes workable. Therefore, it has also been paramount to discuss how PERICLES might become part of this with local key stakeholders – the deliberative set up is established as the result of a dialogue in itself.

In Vilsund, it should also be mentioned that a collaborative forum ('Samarbejdsforum Vilsund') has been established in order to reach across the sound as well as between existing local associations, clubs and community organisations and the variety in interests represented by them. Hence, this is a key stakeholder.

Delivery and Monitoring

In addition, the collaborative forum ('Samarbejdsforum Vilsund') constitutes a local platform for reaching local agreement as well as for dialogue with the municipality and various external parties (funds and regional-national interest organisations). This is still a rather new entity that may not yet have found its role, however it is considered work in progress by the locals themselves, and there is a wide support for building this forum further, as a channel for local interaction as well as for external negotiation.

5. Next Steps

PERICLES will continue the policy analysis through deliberation with decision makers at multiple scales, to provide a suite of policy recommendations to improve integration of cultural heritage in key marine and environmental policies and implementation of associated EU policies, in particular in relation to Integrated Coastal Zone Management and Marine Spatial Planning.

Building on the desk study and the interviews, a synthesis of policy related aspects of PERICLES demonstrations will be conducted by means of a desktop review and a synthesising workshop.   This will be followed by policy good practice and lesson drawing workshops in which policymakers can learn from the actions of their counterparts in other countries or regions. From this, policies or programmes of integration found effective in one institutional setting may successfully be transferred to another, subject to any necessary adaptations. Lesson-drawing will address under what circumstances and to what extent a programme that is effective in one place can be transferred to another, and highlight changes that can be made to facilitate the successful integration of a programme imported from elsewhere.

Through these activities, PERICLES will help enable an effective broad scope approach to policymaking that ensures both inclusion of specific interests and broad democratic representation of citizens, and will provide evidence on how to link environmental and cultural policies, thereby contributing to improved implementation of European policies on coastal zones and maritime areas.

Appendix: Stakeholders Interviewed by Region

Region	Number of Interviews	Type of Stakeholders
Northern Ireland	5	Government Department Heritage Professional NGO
Scotland	3	Heritage Professional Government Body Marine Planner
Portugal	21	Planners Policy Makers Citizens Developers Businesses CH Exploiters Other Interested Parties
Malta	25	Citizen Local Council Volunteer Planning Authority Government Body NGO ENGO Heritage Professional National Tourism Authority Former Fishermen Tourism Industry
Estonia	5	Municipality Heritage Professional NGO
France	11	Governmental Bodies Municipality Members Regional National Park
Denmark	11	Government Ministry Municipal Administrators Municipal Planners Local Politicians Local Museum Leaders Community Representatives