The application of EIA/SEA procedures to the urban cultural heritage active conservation

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Summary — *The application of the European Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) Directives to the management of cultural heritage constitutes the core of the European SUIT research project. This specific focus was motivated by an observed tendency, at the European level, towards a greater integration of human and cultural factors within environmental concerns. Surveys conducted within the SUIT project among national representatives confirmed that Member States largely acknowledge this tendency. These Directives open interesting avenues towards a better consideration of the built cultural heritage in the urban decision-making process, through a deepening of the notion of an urban historical area, as well as through a widening of the scope of conservation. In particular, the screening and scoping stages defined by these procedures appear to be a way of increasing the accountability of decision-making in this domain. It is thus considered that these two Directives may play a central role in the view of fostering integration of cultural heritage in the urban setting.*

The city of tomorrow and cultural heritage background

The development of Charters and Conventions has mainly addressed the conservation of architectural and natural monumental heritage of exceptional cultural value. Of course, the advocates of an improved conservation of built heritage have recurrently insisted on the necessity of adequate consideration of the environment of individual monuments. And most of these authors have, on a regular basis, underlined the high damage potential which lies in uncontrolled transformations of the environments of protected monuments. In most cases it is still the case that, when the urban fabric has been taken into consideration, it was only considered as a context for the passive protection of individual monuments and seldom for its own characteristics.

However, the concept of "accompanying structures" is far from encompassing the actual significance of urban structures. Obviously the urban setting cannot be reduced to a mere *faire-valoir* without serious risk of failure. Continuing such an attitude would actually mean disregarding much of the social, cultural and economic richness that characterises the complex networks of monuments, street patterns and common buildings shaping our daily experience of urban space quality. According to this enlarged definition of urban heritage, a significant number of urban elements, and especially public open spaces, should probably be considered as a genuine *habitat* (in the ecological meaning of the term), fairly well-suited to human growth.

From considering isolated monuments to the urban fragment definition

These considerations led a number of researchers to adopt a more comprehensive understanding of urban heritage, one that would enable the integration of these emerging cultural concerns into the usual set of protected elements. It is worth mentioning that, in this broader list, some elements are material and some immaterial, but all are visible and tangible.

This has significantly increased the problem solving complexity but, in turn, it has also helped to define new approaches, which are much more realistic in terms of present modes of practical development, interventions and urban integration. The relative abundance of non-

exceptional heritage elements drastically changes the scope of the conservation project, as well as the adapted governance style in handling it. Economic and social features indeed play a dominant role, though they may have been of secondary importance for the conservation of monuments. Considering such a situation requires simultaneously managing the financial plan for funding the project, the distribution of urban functions, the subsequent people mobility expected and, obviously, the conservation of the different kinds of cultural assets.

A good example illustrating the actual significance of such an opportunity can be found in the capability it offers for setting up turnkey actions involving, perhaps, a developer or a large number of building owners in a joint project aimed at conserving historic city centres and refurbishing hovels. The management of such complex projects typically involves a large number of different stakeholders, having very different attitudes regarding the different values associated with the urban elements. Such a situation rapidly raises intricate governance issues. How can we choose between alternative restoration and conservation strategies when the involved stakeholders voice conflicting opinions in discussions related to values and value balance?

This is not to say that the conservation of monuments and listed buildings should be disregarded. These significant efforts which sustain their life must be continued and, if possible, increased. We simply intend to underline the essential difference between the conservation of monuments of exceptional interest and the management of larger historical urban ensembles. Furthermore, these two sets of elements are often very close to one another, if not completely overlapping, and they cannot be treated as completely isolated in space. In spite of the strict delineation of status arising between listed buildings and other historic structures (whether included or not in the buffer zone of monuments), there is a continuous set of partly safeguarded constructions and a complex mixing of urban elements of very different value and status.

According to Michel Rautenberg (1998), cultural heritage is a woolly concept with vague contour lines of delineation and content. He proposes to mainly distinguish between two different kinds of cultural heritages based on the expression's twofold meaning. The first one embraces all cultural objects that are listed, institutionalised and labelled by experts. Rautenberg suggests calling this heritage by designation. The second one is the social or ethnologic heritage that includes landscapes, townscapes, living places, shared memories and minor built cultural heritage. Rautenberg proposes calling this heritage by appropriation.

Obviously, the latter is not empowered by any local authority or scientific competence, but simply by those citizens that recognise and transfer it to one another. This heritage, hence, appears as a distinctive support of citizenship in our everyday life: its legitimacy is based on its capability to summon up lay people, social actors and stakeholders. It does not exist a priori in a substantial way. Therefore, its definition has to be collectively devised during the whole duration of the project, keeping in mind that it will change continuously.

Such a broadening of the urban heritage definition introduces promising opportunities in terms of citizens' understanding of and adherence to urban revitalisation plans, as they can easily recognise and appropriate the presence of the more concrete and ordinary urban elements with the conservation project. For instance, an abstract and immaterial object like "urban form" (built form and open space form) through its specific features can provide an efficient way of integrating new building shapes into urban historical areas. It can also help in assessing the impact of the introduction of new activities in traditional public open spaces as

long as the appropriate tools are available. This last extension of cultural heritage thereby claims to include social, cultural and, in more general terms, human activities as part and parcel of the citizens' intangible heritage.

The urban fragment
As a first answer to this enlarged and more complex view on urban cultural heritage conservation problem, the SUIT project proposes to introduce the concept of "urban fragment". The urban fragment is the smallest part of a town where an intervention is proposed, projected, specified or in development, which still retains its urban specificity. It contains urban elements which are in a position to influence or to be influenced by the project. These elements can be punctual, linear or area-based; they can be material or immaterial, intangible and tangible. Their limits are not fixed in advance. They are part and parcel of the development process. Therefore, the list of urban elements is not known a priori in nature or in number. They can be attached to physical elements, freely distributed or mobile, etc. Special attention will be given to certain global elements for their transversal feature, i.e. town silhouettes, social functions (demography, economy, tourism, etc.) or lifecycle (sustainability), in order to enable coping with urban integration.

Towards an active conservation of urban fragment heritage.
As stated here above, when considering a whole urban fragment at a time, the criteria for cultural heritage identification, conservation and integration in an urban setting cannot be simply those used by experts in monument conservation (i.e. authenticity, rarity, aesthetic or symbolic value, etc.). Even the simple set of morphological constraints imposed on the "urban context" and aimed at protecting an individual monument becomes rapidly unacceptable in such a complex situation. It definitely needs more thorough argumentation than just an authoritative expert's decision.

These limitations have led us to propose developing a new approach called *active conservation* of built heritage. There is a real danger of seeing the present historical city centres become open-air museums if the contained built heritage, urban assets and networks cannot find new socio-economic uses (TIESDEL, 1996). When the townscape, the street patterns and the plan of the plots are treated as heritage (when applicable), it always has implications for the functioning of the city as a whole. "Current and future land-uses, traffic circulation, and, last but not least, demographic and social composition in such areas become involved in conservation issues" (ASHWORTH, 1990). The aim of active conservation strategies would be precisely to achieve a better integration of urban heritage within the rest of the town, so as to generate the investment, local development and citizens' involvement needed to conserve it from a sustainable perspective.

This raises important governance challenges, especially in two domains related to decision-making aspects: the identification of new criteria for value assessment and the coming of new partners and new commitment procedures.

SUIT objectives and methodological approach
The main aim of SUIT is to produce a generic methodology specifically devoted to aiding local authorities in the active conservation of their built urban heritage.

This implies the development of new tools and methods for urban historical-fragments quality analysis. This includes morphological analyses, life-cycle analyses, sustainability indicators,

visual perception and legibility (for appropriation) and participative methods to be used in the context of conflict resolution or argumentation setting, etc.

According to the subsidiarity principle, the SUIT method must remain generic, and kept at the European level. It is supposed to help States and Regions to produce adapted *policies*. Municipalities and local authorities wishing to control the impacts of local plans, programmes or projects on historical areas could then use a "customised" methodology. The SUIT project hence considers the Environmental Assessment (EA) procedures a valuable framework for active conservation policy development. Three European directives have been identified as especially well-fitted to this purpose.

Directive 90/313/EEC, on access to information and public participation and the Aarhus Convention (United Nations Economic Council for Europe).
The Aarhus Convention addresses the right of access to information, public participation in decision-making and access to justice in environmental matters. It actually extends and specifies the application of the European directive of 1990, notably in identifying cultural sites and built structures as environmental concerns.

EIA The European Directive 85/337/EEC & 97/11/EC
However, the right of access to existing environmental information is not able to promote the emergence of an actual pro-active decision-making process. It must be noted that this model of information would keep assuming *ex post* decision-making, through recourses, protest or any form of reaction against existing environmental nuisances (TELLER, 2002). Environmental Impact Assessment may be an answer to this issue, as it basically tends to reverse the "burden of the proof". In this approach, it is up to the developer to demonstrate *ex ante* that its scheme is not excessively harmful to the environment in its broader meaning (TELLER, 2002).

SEA Directive 2001/42/EC
Strategic Environmental Assessment (SEA) consists of the formal extension of EIA to policies, plans and programmes. The basic rationale of a SEA is that it can take into account the cumulative effects of a number of projects in the same area. Otherwise, once a land-use plan is adopted, it may prove very difficult to deny planning permission for a project that conforms to the plan, even when its likely environmental impact seems significant. Hence the point of assessing the effects of the plan itself. The same logic applied to other types of plans and programmes would lead to further *ex ante* assessments, thereby achieving a better integration of environmental concerns within the decision-making process" (BOND, 2002).

SUIT deliverables and future developments
Coping with the enlarged number of stakeholders, coming from very different origins and interests, necessitates appealing to a basic common culture among all participants as well as a mutual understanding between this group of actors and the citizens. Therefore, the SUIT project proposes a set of supports available on the Internet: a case base of references, good practices, systems of argumentation etc.

The preliminary results of the SUIT project, produced at the mid-term of the project, can already be found on the following web-site: http://www.lema.ulg.ac.be/research/suit/. This web-site will be regularly updated during the completion of the research. It will serve as an instrument for the progressive building of a European community of researchers and practitioners involved in the integration of cultural heritage within the urban setting, to share

opinions and advice about project outcomes and trigger further integrated research within this specific domain.

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