Learning Heritage Regions

Inclusive heritage policy and management in coastal landscapes across Europe

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Abstract
Over the past two decades, heritage scholars, managers and politicians have argued for more inclusive approaches to heritage. They regard the development of participatory heritage policy and management as a potential way to reach those ambitions, not in the least in Europe, where European politics and financing structures stimulate decentral governments to develop more inclusive heritage management strategies. In this chapter I will evaluate what successes and struggles regional governments run into when trying to implement inclusive and participatory principles in their regional heritage management policies. I will do so by evaluating the incentives, process and results of a five-year interregional knowledge exchange project, called HERICOAST (2016-2020). In this Interreg Europe project, six coastal and fluvial regions exchanged knowledge on how to improve the regional management of their heritage, such as lighthouses, waterlocks and fishing villages, but also culinary traditions and shipbuilding crafts. I will use governance theory on power in participatory projects to analyse what struggles and successes these regions encountered in making their policies more inclusive and participatory, but also how the interregional learning process has potentially helped to overcome these issues.

Introduction

The restoration of monuments has been the domain of heritage experts for a very long time in most parts of Europe. Heritage management has become a highly professionalized and institutionalized sector, from local levels to the world heritage stage. Over the past decades however, voices from academia and society plea for more dialogue between heritage experts and other groups, because the choices that experts make on behalf of society highlight specific interpretations of the past and thus exclude others, like the heritage of minorities, women or others outside canonized history. This criticism now leads to many iniatiaves to try and make heritage management, planning and policy more inclusive on many different levels.

Europe also supports this development, that is very much in line with its *unity in diversity* ideology. One way of doing so is by supporting regional authorities to develop new knowledge and skills with regards to heritage management. What is lacking so far is reflection on *how* participatory heritage management is understood in these contexts and brought into practice. There is a great bulk in critical heritage studies on the one hand, that scrutinize the ways heritage experts deal with these issues.[1] On the other hand there is governance theory about the ways in which participatory governance and planning works, but this is hardly applied in a context of cultural heritage management. In this paper I therefore want to reflect on the experiences of European regions while learning how to make their heritage policies more inclusive for citizens and other stakeholders. I use the project *HERICOAST* as a case study, as it is a recent project in various parts of Europe than pioneers in participatory heritage management on a regional level. My engagement in this project as an academic, advisory partner offered me unique insights in the learning process and access to all project partners and their heritage. The central question for this paper is an evaluative one, in which I apply several key concepts in governance theory to the practice of regional heritage management. The main question of this paper is therefore:

> *In what way has the HERICOAST project contributed to making regional heritage management policy more participatory?*

This research highlights various issues regarding inclusiveness in heritage management. Not only does it make clear how inclusiveness is understood and brought into practice, it also raises questions about democracy and how much stakeholder participation is enough. Reflections on this topic invite academics and policy makers alike to remain critical about topics, also about topics that now have become politically correct and seem 'the right thing to do'.

Before returning to these issues above, I will discuss the theoretical starting points for this paper, after which I discuss the research approach. The analysis of the case study is divided into three, more or less chronological stages, that each demonstrate different aspects of what regional, participatory heritage management in Europe entails.

Participatory heritage management and policy in theory

Cultural heritage management is traditionally regarded as a responsibility of experts (Olsson, 2008). This means that the engagement of non-experts in heritage decisions is far from self-evident (Smith 2006). Since a few decades however there is a growing awareness among experts and academics themselves that decisions about what to keep, how to keep it and what to give up should be not only theirs to make. In academia, it was the critical turn in heritage studies that placed issues of power distribution centre stage. With the concept of Authorised Heritage Discourse, Smith addressed the dominant role of experts in heritage management, who apply a national identity narrative ideal when deciding what is heritage and what is not. She argues that their scientifically based judgements are by

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[1] see for examples the *International Journal of Heritage Studies.*

no means value-free, but actually exclude other interpretations of the past, for example from minorities, are excluded from preservation, funding and public attention (2006).

In heritage management and legislation, this growing awareness of a lack of inclusiveness also emerged and is reflected in policy and the European Landscape convention (2000) and the FARO convention (2005). The broadening of the categories of World Heritage, to move away from the predominant focus on 'fabric' of heritage and to also include landscapes and intangible heritage, can also be understood in this light (Winter, 2013).

On a local level, there is a growing awareness in heritage management and planning of the heterogeneity of place-based communities. This implies that citizen representation through local politicians and policy makers seems to become more and more problematic (Olsson, 2008). However, cultural heritage can be an important carrier of identity and binding factor in social cohesion.

It comes to no surprise that inclusivity of heritage management is now high on the political agendas. For example, national governments jointly finance international cooperation and knowledge exchange on this issue through programmes like the Joint Programme Initiative Cultural Heritage. And the national government of the Netherlands have aimed their heritage policy on accessibility for all (Ministry for Education, Culture and Science, 2018) and started to bring the Faro principles in practice (Dutch Agency for Cultural Heritage, 2020).

The European Union also supported the inclusivity of public policy, in heritage among other sectors. The Interreg Europe programme (2015-2018) was aimed at supporting regional governments in improving policy by stimulating knowledge exchange between governmental bodies on the engagement of stakeholders in their policy development processes. With stakeholders, I mean "to refer both to the participation of citizens as individuals and to the participation of organized groups" (Ansell and Gash, 2008, 546). In theory this could contribute to making heritage policy and management more inclusive, meaning that the ideas of what is heritage and how it should be managed can be expanded by engaging non-governmental actors into the policy development process. Critical heritage theory and case studies would predict a shift away from a focus on heritage objects and materials (such as buildings or museum artefacts), as these tend to fall outside Authorised Heritage Discourses in most European countries. Rather, stories, memories and traditions could be added to the heritage spectrum through more inclusive practices, although it is not always said that experts and non-expert conflicts are about tangible versus intangible heritage aspects.

But how can participatory heritage management be understood and organized? Olsson (2008) stresses how participatory heritage management and planning are part of a planning ideal that relies on collaboration and communication with stakeholders, experts and citizens. This ideal is the alternative for the more traditional planning ideal as being a field of expert knowledge and decision making, as the elected representatives of communities. Communicative planning is more focused on a process of consensus building between various parties.

This *collaborative governance*, as Ansell and Gash (2007) call it, is a messy field, existing out of local responses to traditional planning practices in an attempt to do things differently. They defined collaborative governance as "a governing arrangement where one or more public agencies directly engage non-state stakeholders in a collective decision-making process that is formal, consensus-oriented, and deliberative and that aims to make or implement public policy or manage public programs or assets." (2007, 544).

Ansell and Gash make a clear distinction between expert-based decision making, in which stakeholders could have been consulted and collaborative governance, in which stakeholders are engaged in actual decision making. In practice however, these two forms of governance are very often mixed up. This has drawn critical responses, that blame public bodies to use participation as window dressing, or 'tokenism', rather than really handing over part of the power to decide to stakeholders outside the public realm. In order to make clear what is actually meant with citizen participation, and to distinguish *real* participation from tokenism, Sherry R. Arnstein (1969) developed the *public participation ladder.* In her typology she points out several forms of participation and the way they range from empty rituals to real citizen power (see fig. 1).
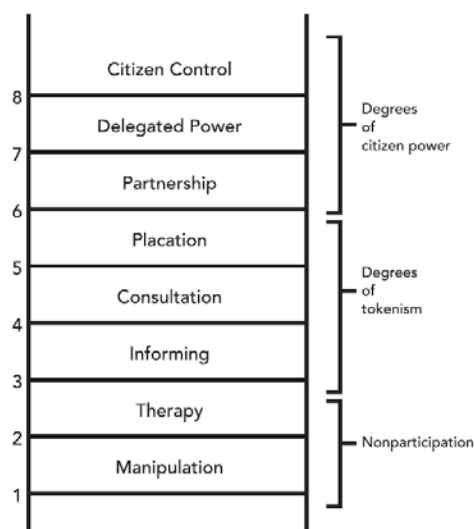
Figure 1. Ladder of citizen participation after Sherry R. Arnstein (1969)

Power, then, is a central concern in any participation process, but tends not to be explicitly discussed very often. Arts and Van Tatenhove define power as "the organizational and discursive capacity of agencies, either in competition with one another or jointly, to achieve outcomes in social practices, a capacity which is however co-determined by the structural power of those social institutions in which these agencies are embedded" (2004, p. 347). Three different stages can be discerned in interactive policy projects, in which power distribution varies (Tatenhove et al., 2010). In the first stage the negotiations of power distribution take place, as part of the set-up of a project, in which the institutional setting, rules and content are crucial context factors. The second stage applies to the project itself, in which actors interact and use their resources to work towards certain output. The final decision making process can be viewed as the third stage, in which project outcomes are translated into formal decisions (Tatenhove et al., 2010).

Most literature on participatory planning is not written with heritage in mind. That opens up the question whether heritage projects are any different than other spatial planning projects. An essay by Bazerman, Tenbrunzel and Wade-Benzoni (2008) suggests that in participatory projects and negotiations, some issues could be called 'sacred', which means that stakeholders are not prepared to make any compromises or trade-offs concerning these topics. Moreover, sacred issues can hold transcendental or infinite value. Cultural heritage can function as a sacred issue in participatory projects, which would make negotiations and decision making different than in other kinds of projects.

The ideal of participatory governance has also received quite some critique over the past years, as it is sometimes "celebrated as part of the trajectory towards a democratic nirvana" (Carpentier, 2016, 70). Arnstein's model in particular has been scrutinized for being uncritically pro-participation and ignores normative questions of the desirability of participation in governance (Carpentier, 2016). Moreover, one could blame Arnstein for oversimplifying multi-stakeholder processes to crude categories and a dichotomy of citizens versus government (us versus them), therewith stimulating rather than decreasing opposition between actors. More recent governance literature does acknowledge the complexities of multiple stakeholder processes in their societal, political and economic contexts (e.g. Arts and Tatenhove, 2004; Olsson, 2008; Tatenhove et al. 2010). Citizens are not the only group of stakeholders that need to be taken into account. This is also true for heritage governance, as owners, investors and users of heritage are in most cases businesses, foundations and other organisations, who have by law a large say in how heritage is maintained and used.

Indeed, the complexities of present-day planning force governments to re-think the idea that heritage, planning and policy are the exclusive domains of democratically chosen politicians and their experts. However, the opposite situation should also be questioned: how representative are participating citizens and stakeholder for the wider society outside the expert-world? Arnstein's explicit message is that more participation is better as participation equals power, but participation is only beneficial if it equalizes power imbalances (Carpentier, 2016). The practice of participation cannot be effective without a sense of engagement, as "the feeling of being invited, committed and/or empowered, but also the positive inclination towards the political (and the social)" are essential components (Carpentier, 2016, 73). Moreover, not every project might be as suitable as the next for participatory projects. In the context of heritage management and policy, small-scale, local planning decisions could literally be 'closer to home' than abstract, large-scale and long-term policies. It could thus be the case that some heritage management projects benefit more from participation than others.

Research approach

Due to their complexity, participatory processes are not easy to analyse and consensus on how this should be done is lacking (Carpentier, 2016). Moreover, participatory processes in heritage management are still an understudied field. As we need a starting point for this endeavor, I decided to use the work of Tatenhove, Edelenbos and Klok (2010) as a framework. Their three stages of power allow me to disentangle various aspects of the case study, supported by their conceptual groundwork in governance studies. I will thus describe the power-relationships between the stakeholders across the six partner regions for each phase. I will then use Arnstein's ladder of citizen participation to establish what kind of participation predominates in each project phase. Throughout the chapter I will reflect on whether any sacred aspects of heritage played a role in the project's various stages.

The author of this chapter was involved in HERICOAST as an *advisory partner,* responsible for conceptualizing, organizing and facilitating the knowledge exchange between the regional governments that were partners in this project. I was therefore not directly involved in each regional policy development process and had incidental contact with the stakeholders in the six regions. I was however in direct contact with the regional governments who worked on their action plans and the stakeholders involved.

This research is based on the documents that were developed during the HERICOAST project between April 2016 and June 2020. These were complemented by an oral interview via ZOOM with the representatives of each partner region to the project, to gather more in-depth knowledge of how each region worked with their stakeholders and what went on within the regional cooperation during the project. I was also able to tap into first-hand observations of the heritage and stakeholder interaction in almost every region, as I visited these regions in the course of the project.

This research thus mainly draws an image of participatory heritage project through the eyes of the regional officials involved and does not take into account the perceptions of other stakeholders in each region. Despite these shortcomings, I believe that understanding the project through a *heritage-and-participation lens* described above offers valuable insights in to how participatory heritage activities are understood and applied in practice.

Stage 1: Architecture of the HERICOAST project

The HERICOAST project
The HERICOAST project took place from 2016-2021 and was funded through programme Interreg Europe. Interreg Europe is a funding scheme from the European Regional Development fund and aims at policy learning for local and regional governments. Through its funding, it stimulates knowledge exchange between these governments on several themes, or 'priority axis'. HERICOAST addressed the

priority axis of 'Protecting the environment and promoting resource efficiency'. It was aimed at improving heritage policies in coastal and fluvial landscapes. Each region then brought in their specific challenges that were on the one hand regionally specific, but also had many communalities that made cooperation worthwhile (see Egberts 2019 and Table 1). Lead partner was the regional government of Vest Agder in Norway. They initiated the project as they wanted "to improve the management of some specific cultural environments in cooperation with the municipalities"(Kristiansen and Martinsen, 2020). They refer to the historic outports (Uthavn) that are scattered along the Norwegian south-coast and that are now under pressure of over-tourism. Other partners that joined the project were Donegal (Ireland), Lea Artibai (Spain), Molise (Italy) and Tulcea (Romania). The latter joined the project because "it came as an opportunity for us to generate

knowhow, how to approach this rehabilitation […] and to involve […] the community as much as possible" (Artamon, 2020). The Spanish region Castile y León also joined the project, even though it is not a coastal landscape. The regional junta however was aiming to "obtain a sustainable management of cultural heritage and to better preserve the cultural landscape" together with local and regional stakeholders (Cuevaz Ortiz 2020). They wanted to develop a 'participatory model' for branding the Castila Waterway, a 207 km long canal dating from the 18th and 19th centuries that was intended to connect the Spanish inland regions with the Gulf of Biscay for transport of goods. Even though the region is 'landlocked' and not coastal, the partners considered their involvement relevant due to the focus on a water infrastructure. Vrije Universiteit Amsterdam (represented by the author of this paper) and CIVILSCAPE took on the role of *advisory* partners.
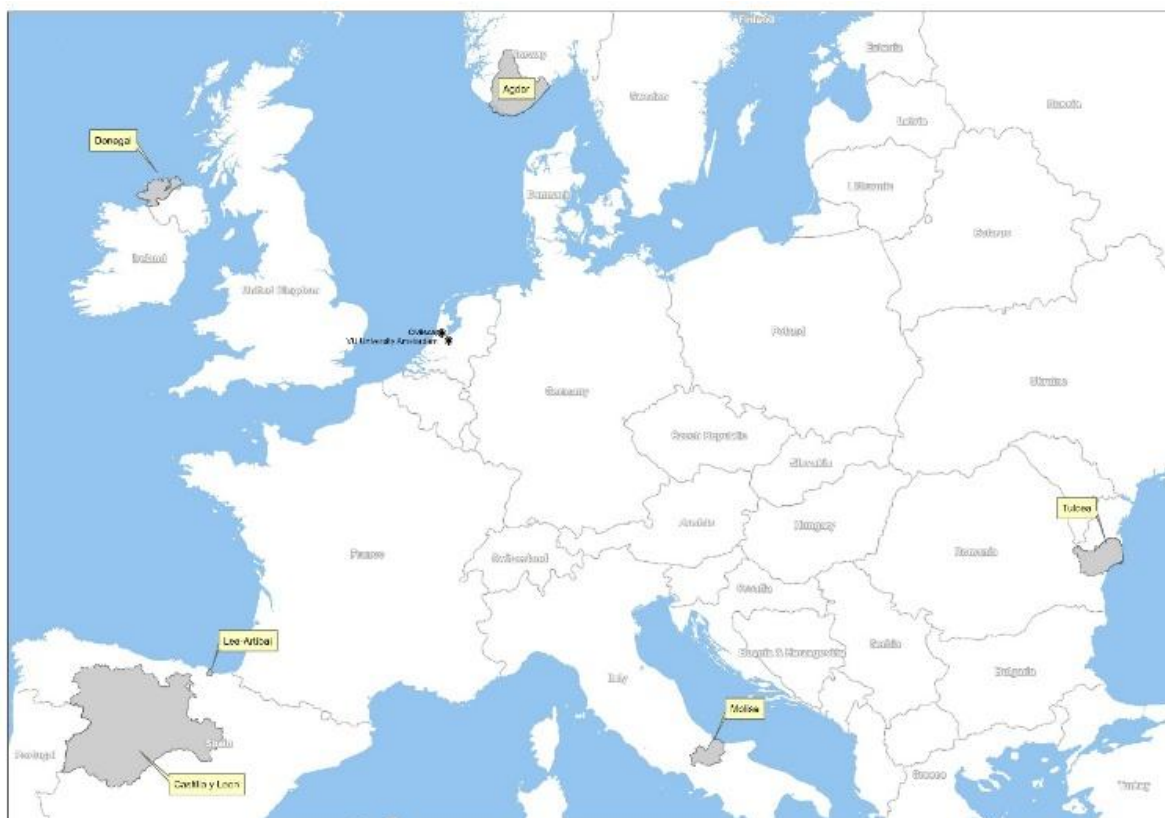
Map 1. Geographical distribution of HERICOAST project partners. Courtesy by Agder Fylkeskommune

Region	Central aim of action plan
Agder	The action plan of Vest-Agder County Council aims to impact the regional development policy instrument Strategy for cultural heritage sector in Vest-Agder (2014- 2020). The policy instrument is managed by Vest-Agder County Council and was adopted by the county council in 2014. The strategy describes eight thematic priorities. One is the historical outports on the archipelago of Agder. The strategy recognises the unique heritage value of these small townscapes as defining elements in the coastal landscape. As this ensemble of coastal heritage is spread over two neighbouring counties and fourteen municipalities, the legal responsibility for protection of this heritage is divided between multiple public authorities, both local, regional and national. Consequently, the differences in how the individual outports are managed is considerable. These stem from different management traditions, professional and financial resources and differences in type and content of the development plans put into use by the municipalities. This diversity in public management is a key challenge for the protection of these heritage assets as part of the larger cultural landscape when faced with an intense demand for redevelopment of the landscape for recreational purpose. Any improvement of the heritage management must be developed in close cooperation with all relevant stakeholders, both public and non-public, in order to be efficient, durable and sustainable in the longer perspective.
Castila y León	The objective of this action plan is to give answer to a need identified in the policy instrument (ERDF 2014-2020 for Castila y León) regarding a participatory and sustainable management.
Donegal	The objectives of the Action Plan are set out to respond specifically to the gaps in policy that have been identified and to inform future policy making and implementation. At a local level this will be achieved through the policy instruments of the County Development Plan and in the forthcoming Buncrana Local Area Plan which is currently under review by Donegal County Council. Is is envisaged that the actions will inform future regional policy through the Regional Social and Economic Strategy prepared by the North Western Regional Assembly that is in draft form at present and the North West Metropolitan Area Spatial Plan that is being prepared jointly by Donegal County Council and Derry City and Strabane District Council on a cross border basis. It is further envisaged that the action plan will inform the forthcoming Marine Spatial Plan. This Plan will be prepared on a national basis by the Department of Marine following consultation among all county and regional authorities.
Lea Artibai	The goals of the Action Plan respond to the policy gaps identified and are deployed into different governance levels, target policy instruments and actions: - to define and implement an integrated Coastal Heritage valorisation strategies with the coordination of stakeholders; - to increase entrepreneurship and business support services in Coastal Heritage Tourism.
Molise	The main objectives of the Action Plan are: On local level (objective 1): To improve management of ROP through development and implementation of local projects for preservation of the Natura 2000 network and of the cultural heritage of Molise region. On the regional level (objective 2): to improve the management of ROP through improved governance based on development of new governance network and system for enhanced communication with end users.
Tulcea	The objective of the Action Plan will pursue the objective set for improving the Regional Operational Program 2014-2020 policy instrument by implementing two new projects. This is divided into three sub-actions: Sub-action 1: Restoration, conservation and modernization of the Old Lighthouse of Sulina and the Museum of Ethnography and Folk Art in Tulcea. Sub-action 2: Promotion of awareness of the Old Lighthouse of Sulina and the Museum of Ethnography and Folk Art in Tulcea and their inclusion in the tourist circuit. Sub-action 3: Disseminating project results and improving knowledge amongst regional policy makers and other relevant stakeholders.

Table 1. aims of action plan per partner region. Source: HERICOAST regional action plans, 2018

The Interreg Europe programme

The Interreg Europe call for funding was rather structured, meaning that any consortium that applies for funding has to adhere to a pre-determined set of steps and activities to address a certain problem. This implies that partners in a project content work on improvement of their policy by working through several pre-scripted activities in a two-phase project. For HERICOAST, the partners translated that into a set of activities that were set-up as part of the project's application for funding (Table 2).

	Regional activities	Interregional learning activities
Phase 1 (3 years)	Identification and analysis of heritage & territorial situations	Inventory of expertise and learning points by means of an online questionnaire and partner discussion
	Stakeholder analysis	Establishment of themes for knowledge exchange
	Identifying and describing good practices	Exchanging good practices per theme
	Finalizing action plan	Developing general principles and tools per theme in inter-regionally formed working groups
		Writing and publishing Toolbox for Coastal Heritage Management (Egberts et al. 2018)
Phase 2 (2 years)	implementation of regional action plans Implementation of pilot action in Vest-Agder	Bilateral exchange between regions on best practice examples
	Monitoring of the implementation through contact with stakeholders	Sharing outcomes on final conference

Table 2. regional and interregional learning activities throughout the HERICOAST project.

Interreg Europe demanded involvement of stakeholders early on in the regional policy development project a top-down decision that was responded to by the regional partners in the application for funding. HERICOAST can thus be understood as a learning trajectory for European regions to regionally implement stakeholder participation in policy development for heritage and landscape policy. However, the programme did not dictate a definition of what stakeholders are, how they should be invited and what role they should take within the regional projects. These decisions were left to the applying consortia of regional governments to decide. Interreg however prescribed that regional authorities and incidental advisory partners were eligible for funding. That also implies that regional stakeholders could be involved, but were expected to invest their own resources to the project, particularly in the form of labour. Budgets for meetings, travel and dissemination were available to them from the funding scheme. However, the regional authorities were the coordinators of these budgets, which implies that they got to decide who could participate in meetings, field trips and events.

The partner regions were thus entitled to invite the stakeholders they found relevant for the project. In some cases these decisions were practical as well as strategic: "For example, the working relation with the different municipalities could be an argument for involving them, either that we are having a good cooperation with them, so let's continue that, or we don't have very much cooperation with that municipality, so we need an excuse to have a better dialogue with them and this project was […] such an excuse" (Kristiansen and Martinsen, 2020). From the interviews overall it appeared that this set-up was a conventional one, as the representatives of Lea-Artibai mentions: "we always take the initiative in the actions developed and to try to impulse the participation" (Irusta, 2020). For Donegal region this also made sense, as their action plan was aimed at high-level policy that was seen as less suitable for participation: "initially we had identified the targeted stakeholders and they were basically high level. […] Others were approached and targeted and we would have used them as consultees […] the kind of project that we were dealing with, it was just too huge..." (Greene, 2020). The detailed requirements of the Interreg call thus on the one hand demanded stakeholder involvement in regional policy making, but on the other hand only 'rewarded' regional authorities for

including them. For HERICOAST this resulted in a project application that was aimed at stakeholder involvement, but only at the execution stage of the project, not necessarily in its conceptualization. This points towards an imbalance in power and resources in the 'power architecture of the project' (Ansell and Gash 2007). When placing the first stage of the Interreg project on Arnstein's (1969) ladder of citizen participation on rung 3: Information. This is because informing stakeholders about the project's initiative was enough at this point and no further involvement was needed nor formalized. This means that the set-up of the HERICOAST project, by its response to a top-down call with a promise for future participation, should be understood as a form of 'tokenism'. Tatenhove at al. (2008) see this kind of power architecture as a way to gain public support for governmental decisions, but acknowledge that indeed the power relations between governments and stakeholders are unequal.

Stage 2: Negotiations between stakeholders and regional administrations

The second stage of the project addresses the time period in which the regional policy development process took place, during which the negotiations between the regional administrations and the stakeholders took place (April 2016-June 2020). Even though budgets were only allocated to the partner regions, the central aim of this phase was to use them for participatory policy processes. The partner regions invited a limited number of stakeholders in the initial phase of the project and included these in the compulsory 'stakeholder analysis' (see table 3), but they allowed others to join the project when this was useful. In the case of Donegal this was done as the project evolved from a high-level policy project to one that also included more local initiatives, around which stakeholders and owners were engaged (Greene, 2020). In Agder this meant that gradually the decisions about who was engaged were more and more taken by the group of stakeholders rather than the regional government alone (Kristiansen and Martinsen, 2020).

Across the various regions, no representatives of citizen groups were directly involved. Stakeholders were generally involved in periodic meetings that were aimed at finding consensus, as was the case in Molise: "During the project for the writing of the action plan we involved the stakeholders, for example the University of Molise, involved them in the writing of the action plan. It was more than to inform them. The same was done with the other stakeholders"(Colagiovanni et al., 2020). Also in Tulcea, the main aim of the collaboration was to get approval and support from the stakeholders in the area: "So, we tried to consult them […] and to make a relevant approach to establish the[se] objectives, to be approved by each of these groups"(Artamon, 2020). In most cases the stakeholders gathered during recurring stakeholder meetings and would sometimes join the regional partners in attending the project's workshops, hosted by other partner regions. Only Agder formalized the engagement of the stakeholders further, but forming a regional steering group with what they identified as key representatives (Kristiansen and Martinsen, 2020).

For some project partners the participatory process was merely a continuation of longer-standing relationships with their stakeholders, as was the case in and Castila y León and Lea-Artibai. However the latter partner noticed that "we have seen […] an increase in the involvement, commitment and participation of all the stakeholders, especially after the final event" (Irusta, 2020). In other cases, such as in Molise and Tulcea, the project provided a new way of working and thus of engaging stakeholders to policy processes they had not been part of (Collagiovanni et al., 2020; Artamon, 2020).

Consensus did not always come easy between the regional governments and their stakeholders and the discussion points varied greatly among the regions. Some of them were about relationships and commitment and prioritization between stakeholders and the regional government (Molise, Donegal and Lea-Artibai), how to access additional funding (Tulcea and who to continue the participatory character of the project after the financing period (Castila y León). In many cases the regional partners made a considerate effort to shape policy in such a way that it would be close to the stakeholders' day-to-day realities (all interviews).

Region	Public stakeholders	(representatives of) private stakeholders
Agder	SKMU Sorlandets Kunstmuseum; Vest-Agder County Council; Aust-Agder County Council.	USUS, a network devoted to enterprises operating in the travel, experience and culture industries in the Agder and Telemark;
Castila y León	Duero river Hydrographic Confederation; General Directorate for budget and statistics of the Regional Ministry of Economy and Treasure; Provincial Government of Palencia City Councils of Medina de Rioseco, Paredes de Nava, Frómista, Herrera de Pisuerga, Alar del Rey and Villaumbrales; ADECO and SIRGA Associations and Consortium; University of Valladolid; Territorial Department for Culture in Palencia	The Wine Route of Cigales; Consortium of the Castilla Waterway
Donegal	The Heritage Council; Failte Ireland; Donegal Tourism (now integrated within DCC); North Western Regional Assembly; Western Development Commission; Letterkenny Institute of Technology; Local Enterprise Office; Irish Landscape Institute; Marine Institute Public Participation Network;	
Lea Artibai	Leartibai Development Agency; Lea-Artibai Municipalities of Lekeito, Ondorroa, Mutriku, Berriatua; Baquetour; Public Agents Work Table; Basque Government, Cultural Heritage Department; Basque Government, Ports, Fisheries and Aquaculture Department; Azaro Foundation; Leartiker Research Center; Lea-Artibai Vocational School; Lea-Artibai Coastal Tourism Work Group; Lanbide-Basque Employment Service; BEAZ	Private operators with interest in the definition of new products in the coastal heritage field;
Molise	University of Molise, Department of Biosciences and Territory; Azienda Autonoma di Soggiorno e Turismo di Termoli; Molise Orientale Touristic District; Urban Area of Termoli; Coastal municipalities of Campomarino, Petacciato, Guglionesi, San Giacomo degli Schiavoni and Montenero di Bisaccia. Legambiente Molise: Nature and Environmental Protection	Private companies interested in the promotion and protection of coastal heritage like hotels and restaurants owners, travel and tourism operators.
Tulcea	"Gavrila Simion" Eco-Museum Research Institute in Tulcea; Tulcea County Directory for Culture; Sulina City Territorial Administrative Unit; T ulcea Municipality; MInistry of Regional Development and Public Administration/ South-East Regional Development Agency; CeRaHes Cultural Association; National Association for Cultural, Rural and Ecological Tourism; Murighiol, Sarichioi, Jurilovca and Sf. Gheorghe Communes.	

Table 3. Overview of stakeholders per region in 2018. Source: HERICOAST regional action plans

In Agder and Tulcea some of the disagreements were about heritage. In Tulcea, minority groups feared that the project's attention to their heritage would attract tourists to their living area. Putting their heritage on display was something they tried to avoid (Artamon, 2020). This resonates with the idea that heritage can have a certain sacred value (Bazerman et al., 2008), that stakeholders are unwilling to compromise on despite the economic opportunities that tourism offers for communities that struggle to make ends meet. Similar conflicts were expressed in Agder, where house owners had difficulties with promoting the historic outports for tourism (Kristiansen and Martinsen, 2020). The current visitor numbers cause issues already, for example because the villages do not have any public space and tourists use footpaths from one private property to the next.[2]

Nevertheless, most project partners looked back on the cooperation positively. They were happily surprised for example to find that the proposal writing, workshops and final conference were important moments in gaining regional attention and support for their activities (Kristiansen and Martinsen, 2020 and Irusta, 2020). Moreover, the regional partners stated that the project enhanced their tools to work with stakeholders through the project and by seeing the examples of the other regions (Artamon, 2020; Cuevas Ortiz, 2020; Greene, 2020; Irusta 2020).

The COVID-19 crisis has of course drastically influenced the stakeholder engagement process in from spring 2020 onwards. When the regional partners were interviewed in June, some of them had lost most contact with their colleagues and stakeholders (Greene, 2020), whereas other partners were very optimistic about the opportunities that the emancipation of digital communication brought to cooperation with stakeholders in their thinly populated regions (Kristiansen and Martinsen, 2020)

The uncertainty that comes with the crisis, particularly with regards to travel tourism and the economy is a serious worry (Artamon, 2020), but some partner regions see opportunities for their coastal destinations that are *off the beaten track* and thus potentially seen as safer holiday destinations than the more popular sites (Collagiovanni et al., 2020; Irusta, 2020). Overall at the time of the interviews it was too early to predict more specifically what the impact of the COVGID-19 crisis would be on but the uses of heritage and stakeholder involvement in the partner regions.

Overall, stakeholders were actively involved in the actual execution of the HERICOAST project in all regions. Finding consensus and shaping policy that would be close to the stakeholders' day-to-day reality were core aspects of the cooperation process. These participatory ways of shaping heritage policy will, according to the regional partners, outlast the HERICOAST project (Collagiovanni et al. 2020; Cuevas Ortiz, 2020, Greene 2020, Kristiansen and Martinsen, 2020). However, decision power was not formally shared. This puts the second stage of the HERICOATS project in the fifth rung of Arnstein's participation ladder, called 'placation' (1969). Stakeholders were invited to the table to advise and bring forward their own ideas and agendas, but the final decision power remained with the regional authorities. More so, the civil servants of the partner regions played a key role in deciding who could join the process, who resources were distributed and who's say was taken on board in the policy making process. This reflects the observations of Tatenhove et al. in other participatory projects that were aimed at gaining public support (2010).

Stage 3: Decision making and implementation of outcomes

The third project stage is when final decisions are being made and implemented. At the time of writing of this chapter, the final decision making process and implementation of the action plans is still ongoing. However, it is already clear that "in the end, it will be the regional government taking the final decisions" (Kristiansen and Martinsen, 2020). In none of the partner regions the stakeholders have an official say in the implementation of the regional action plans they contributed to.

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[2] Based on author's observations and conversations during a visit to Agder in 2016.

Figure 3. Every regional workshop took place in a different partner region. Project partners and stakeholders gathered for knowledge exchange in the form of meetings and site visits to best practice projects. Donegal, spring of 2018. Courtesy by Donegal County Council

As this phase addresses legal responsibilities of democratically chosen, regional governments, it makes sense that the Interreg programme cannot demand any form of influence on whether the project's regional action plans will be accepted and implemented in the end. The commitment they ask is a financial one that is embedded in the programme's financing structure. Namely, regional governments commit to matching the European funding with their own (and national) resources between fifteen (EU countries) and fifty percent (Norway) of the project's budget. These add up to significant amounts, which demands commitment of partner regions to the project gives some indication of a need for regional applicability for regional policy (HERICOAST, 2016).

This overall image of the final stage of the project belongs on the lower rungs of Arnstein's participation ladder, such as 2: Informing. This is because stakeholders are informed and about final decisions and implementation, but it is uncertain whether their engagement will continue and whether the outcomes of the regional policy development will in fact benefit them. Even more so, the successful cooperation between regional authorities and stakeholders in Donegal has led to a new application for funding on the initiative of one of the stakeholders. Donegal County Council now takes on the role of stakeholder (Greene, 2020)

Discussion and conclusions

The HERICOAST project was generally perceived as a successful project in its aim to make regional heritage policy development more inclusive, according to project participants. It seems as if the strictly prescribed INTERREG policy development process indeed stimulated contact and exchange between regional authorities and stakeholders in their heritage policies. In most aspects the partner regions implemented collaborative governance as defined by Ansell and Gash (2007). However, none of the regions engaged stakeholders directly in decision making, even though the policy development processes were generally aimed at decision-making based on consensus among stakeholders.

The analysis of the project was subdivided in three project stages after Tatenvove et al. (2010). Each phase was easily identified within the project structure and clearly marked a different level of participation. Whereas the first and last stage showed rather few participatory aspects, the running of the project itself was indeed much more 'inclusive'. Stakeholders were engaged in collaborative policy making, in which they were consulted and the processes were aimed at reaching consensus. This fit well with existing literature on other policy projects that are aimed at generating public support (Tataenhove et al. 2010). In the eyes of the project partners, this process led to satisfying results.

From Arnstein's perspective however, this project did not exceed 'tokenism' participation (1969), in which public authorities consult others, but have freedom to do with the outcomes as they see fit. This however brings me back to some ethical questions that have arisen before. Most importantly the representativeness of participants in participatory processes is an issue that Arnstein does not address. Even though regional authorizes may not represent the complex communities they serve and they are democratically chosen. Granting decision power to participating stakeholders demands a solid answer to the question how these stakeholders represent communities better than the authorities themselves. This implies that more participation does not always have to be better, it is not "a stairways to (political-democratic) heaven" (Carpentier, 2016, 77). One consideration that needs to be mentioned here is the matter of scale. Project partners noticed that the more concrete and local their activities are, the more sense it made to them to include other non-governmental stakeholders. Higher-scale projects have different kind of complexities, require different knowledge than most citizens have and feed into different agendas that those of most stakeholders. Future research could shed light on the legitimacy of such decisions, which have not received much attention in the field of heritage policy and management so far.

Even though Arnstein's ladder of participation helps to generate insight real-life policy projects in the brief scope of this paper, but a lot of the complexities that are involved in multiple stakeholder heritage processes get lost in this type of analysis. This flaw is easily recognized, but the underlying problem is less easily solved. The governance theory that builds on the work of Arnstein and others has developed in relative isolation from heritage studies and as a result, participation in relationship to heritage remains rather under-theorised (Adell et al, 2015). This is remarkable, as the critical turn has put participation high on the agenda of both heritage scholars and authorities, as I already mentioned. Lessons about what works and what doesn't, particularly in the context of heritage-related projects still needs to find its way to the heritage policy arena as well as the academic world. The relevance of this paper might lie as much in critically evaluating ongoing processes as addressing the challenges that remain unresolved, for now.

References

Adell, N., Bendix, R. F., Bortolotto, C., & Tauschek, M. eds. (2015). *Between Imagined Communities and Communities of Practice: Participation, Territory and the Making of Heritage*. Göttingen: Göttingen University Press. https://doi.org/10.4000/books.gup.191.

Ansell, C., & Gash, A. (2008). Collaborative governance in theory and practice. *Journal of Public Administration Research and Theory: J-Part, 18*(4), 543–571.

Arts, B., & Tatenhove, J. V. (2004). Policy and power: a conceptual framework between the 'old' and 'new' policy idioms. *Policy Sciences: Integrating Knowledge and Practice to Advance Human Dignity, 37*(3-4), 339–356. https://doi.org/10.1007/s11077-005-0156-9

Bazerman, M. H.; Tenbrunsel, A.; Wade-Benzoni, K. (2008). When sacred issues are at stake. *Negotiation Journal, 24*(1), 113-118.

Carpentier, N.. (2016). "Beyond the Ladder of Participation: An Analytical Toolkit for the Critical Analysis of Participatory Media Processes." *Journal of the European Institute for Communication and Culture 23*(1):70–88. doi.org/10.1080/13183222.2016.1149760

Dutch Agency for Cultural Heritage (2020). Erfgoedparticipatie Faro.
https://www.cultureelerfgoed.nl/onderwerpen/erfgoedparticipatie-faro (accessed September 9, 2020).

Egberts, L.R., Gotzmann, D., Zoeteman, M. & Kristiansen, K. eds. (2018). *Toolbox for Coastal Heritage Management*. Interreg Europe Policy Learning Platform. https://issuu.com/hericoast-interreg/docs/hericoast_toolbox (accessed September 18, 2020).

HERICOAST: Management of Heritage in Coastal Landscapes. Approved application to the Interreg Europe Call for Funding 2016.

Ministry for Education, Culture and Science, (2018). De betekenis van erfgoed voor de samenleving. Policy brief. The Hague: Ministry for Education, Culture and Science.

Olsson, K. (2008). Citizen input in urban heritage management and planning: a quantitative approach to citizen participation. *The Town Planning Review*, *79*(4), 371–394.

Smith, L. 2006. *Uses of Heritage*. London: Routledge.

Tatenhove, van, J. P. M., Edelenbos, J., & Klok, P. J. (2010). Power and interactive policy-making: a comparative study of power and influence in 8 interactive projects in the Netherlands. *Public Administration*, *88*(3), 609–626.

Winter, T. (2013). Clarifying the critical in critical heritage studies, *International Journal of Heritage* Studies, 19(6), 532-545, DOI: 10.1080/13527258.2012.720997

Regional action plans

Agder County Council (2019). *Regional Action Plan*.
https://www.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_154771 5017.pdf (accessed September 25, 2020).

Castilla y León Regional Government (2018). *Regional Action Plan.*
https://www.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_155014 7689.pdf (accessed September 25, 2020).

Donegal County Council (2018) *Regional Action Plan*.
https://www.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_154721 3707.pdf (accessed September 25, 2020).

Leartibai Development Agency (2018). *Regional Action Plan*.
https://www.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_155609 2585.pdf (accessed September 25, 2020).

Molise Region (2018). *Regional Action Plan.*
https://www.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_154771 9306.pdf (accessed September 25, 2020).

Tulcea County Council (2019). *Regional Action Plan*.
https://www.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_154771 9306.pdf (accessed September 25, 2020).

Interviews

Artamon, Leonid-Silviu, on behalf of Tulcea County Council, June 5, 2020 via ZOOM.

Colagiovanni, Adolfo, Mariaphina Izzo and Annunziata Di Niro on behalf of Molise region, June 18, 2020 via ZOOM.

Cuevas Ortiz, Laura, project manager at Castilla y Léon Regional Government, Castilla y Léon region, June 2, 2020 via ZOOM.

Greene, Alana, Executive Planner at Donegal County Council, Donegal region, June 19, 2020 via ZOOM.

Irusta, Nekane, on behalf of Leartibai Development Agency, June 9, 2020 via ZOOM.

Kristiansen,Kåre, Interreg project leader on behalf of Agder County Council and Hege Kristin Martinsen, project manager at Agder County Council, June 2, 2020 via ZOOM.