

**OpenHeritage: Deliverable 1.3 (Report)**

# **Typology of current adaptive heritage re-use policies**

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Author(s)	Dóra Mérai (CEU); Loes Veldpaus (UNEW); Markus Kip (UBER); Volodymyr Kulikov (CEU); John Pendlebury (UNEW)	
Contributor(s)	Federica Fava (Roma3); Dominika P. Brodowicz (SARP); and Maciej Czeredys (SARP); Iryna Sklokina (CUH); Karim van Knippenberg (UGENT); Alina Cristiana Tomescu (Eurodite)	
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## 0 Introduction

This report presents the findings of Work Package 1 for the OpenHeritage project, funded under the EU's Horizon 2020 research and innovation programme (grant agreement 776766). OpenHeritage aims to identify and test the best practices of adaptive heritage re-use in Europe. Drawing on the observations and results, the project will develop inclusive governance and management models for marginalized, non-touristic heritage sites and test them in selected "[Cooperative Heritage Labs](#)". In order to develop an understanding of the different policy, regulatory and financial contexts in which heritage can be re-used, WP1 investigates heritage and other relevant policy and funding in fifteen countries across Europe.

The adaptive reuse of heritage is, more and more, promoted as a financially more viable and environmentally more sustainable way to achieve both regeneration and conservation. With a growing interest in instrumentalising heritage for urban regeneration, sustainability and capitalising on the economic value of local identity and tourism (UNESCO 2016; Veldpaus and Pendlebury 2019), adaptive reuse has emerged as a policy aim in several countries and more recently also in EU governance (Creative Europe Programme EU 2020; EU and Futurium 2020; UN-HABITAT 2016). To understand how the existing governance models are facilitating (or not) adaptive reuse, we first developed the overview of the regulatory and policy context (Veldpaus, Fava, and Brodowicz 2019). This report presents a typology of how countries facilitate adaptive heritage reuse, based on the findings in D1.2.

The report is organised into four principal sections. After an introductory section, section 1 looks at the methodology applied to develop the typology. Section 2 presents the typology and offers an interpretation of the results. Section 3 summarizes the results, explores some underlying factors, and offers some conclusions for transferability, leading to Work Package 3, *Evaluation of adaptive re-use management: contrasting policies with practices*. Section 4 contains brief national summaries which present the policy systems in various countries in the context of adaptive heritage reuse as a background of the qualitative analysis. In the Annex, some further background materials are provided which were used in the quantitative analysis.

### 0.1 Aim & Research Question

In developing this typology, we aimed to suggest a grouping of countries according to national/regional differences, and highlight patterns in the approaches to adaptive heritage re-use in Europe along the thematic lines of the project: policy integration (in the context of regional integration), resources (resource integration) and community participation (in the context of stakeholder integration). The purpose of the typology is, first, to gain an overview of the different policy systems and approaches to adaptive reuse, and second to structure and promote the transferability of insights about adaptive reuse policies where possible.

Our starting assumption was that adaptive reuse is not conditioned by one single set of policies for which causalities can be identified. Rather we understand the

factors affecting adaptive reuse as an assemblage (see e.g. Pendlebury et al. 2019) in which policies, institutional processes and practices, funding, priorities, and traditions are related to each other in specific ways. As such assemblages are never a clear set of independent variables, but rather a mixed bag of interdependencies, effective direct transferability of specific approaches to heritage adaptive reuse is complex, if not impossible. In order to understand where transferability can take place, our goal with the typology was to clarify the similarities and differences in institutional and policy-contexts related to adaptive reuse. Such clarification allows for more informed insights about the possibilities of learning from other policy contexts. The idea of generating specific types on the basis of pattern similarities aims to support this process.

The objective is to create a typology for how adaptive reuse is regulated which is not definitive and singular. The typology is dependent on the perspectives taken, what aspects are understood to be relevant and to what extent, as well as the complexities and the nuances of our policy expertise for all of these countries. Our typology provides a way to think about patterns within and between countries. We provide a reasoning for our choices and we have tried to be mindful of the differences that exist among countries within each type – as far as that is feasible whilst developing a typology. Furthermore, the types are based on a snapshot of a particular moment. There are temporal dynamics at play in each country (in social, political or economic terms) that on the one hand cannot be properly represented in a typological approach, and on the other can swiftly change the situation of some factors influencing how adaptive reuse is facilitated (or not).

We have focused on formal processes and procedures around adaptive heritage reuse, and our mapping and reviewing of legal and regulatory frameworks, government policy, and finance and funding mechanisms.

The **Research Questions** guiding the work:

- *Which policy combinations and governance arrangements are relevant for adaptive heritage reuse?*
- *What are the patterns (similarities and differences) and themes within the policy context, that facilitate adaptive heritage reuse?*
- *How can we group countries accordingly?*

## 0.2 Context

In this report, we aim to approach adaptive reuse from a perspective of policy, governance and resourcing.

In contrast, most contemporary literature on adaptive reuse is underpinned by a focus on the materiality of buildings and originates from the disciplines of interior design and (re)architecture (Plevoets and Cleempoel 2019; Provoost and CRIMSON historians and urbanists 1995; Swensen and Berg 2017; Wong 2016). Typologies developed focus on the type of heritage or the heritage value(s), or the type of intervention in a building (Plevoets and Van Cleempoel 2011).

Other typology frameworks focus on national policy levels, the most relevant on national heritage policies and national planning policies. Planning typologies have

been developed through a series of ESPON projects (Dühr, Colomb, and Nadin 2010; Nadin and Stead 2013; TU Delft and ESPON 2018) and the OECD's work on Land-use (OECD 2015; Organisation for Economic Co-operation and Development 2017). In heritage, the work by HEREIN, and subsequently publication by Pickard, have been very useful (HEREIN 2014; Pickard 2002, 2012).

Grouping countries based on their approach to adaptive heritage reuse involves more than just overlaying those existing typologies. In the research for D1.2 we found that many forms of regulation and policy can be relevant for adaptive heritage reuse practices, but that generally it is law and policy relating to cultural heritage and urban planning that are the most significant. Some further conditions influencing adaptive heritage reuse include the level and type of resources available, the level of integration of planning and heritage systems, the collaboration between various levels of government, and the level of facilitation of bottom up initiatives. These findings guided the development of this typology and were used to cluster countries around these themes. Reuse practices are thus initially framed by the intersection of heritage policy and building regulations with the complex context of urban or rural governance. This framework already varies from country to country because of the significantly different institutional conditions and collaborations, national and local social models, and different definitions of heritage. As D1.2 already showed, the influence of various non-heritage-related funding streams, policy programmes that seemingly have nothing to do with heritage, and local and regional resources beyond funding for projects, also prove to be potentially influential.

The increase in adaptive reuse practices is connected to the development of specific policy programmes within the context of heritage and planning, but tend to (also) be linked to other policy agendas, such as urban regeneration, tourism development, the support of creative industries, increasing environmental quality and promoting 'localism'. Steers are also given by specific resource availability (e.g. EU funds) or the lack thereof (e.g. austerity). Moreover, we observe that adaptive reuse is an explicitly stimulated process in a growing number of countries.

Our intention is that cross-national learning about adaptive reuse can occur both within the groupings of countries and possibly between groupings too. The complexity of the assemblage of people, policies, resources, and institutional differences means any comparison or idea of transferability needs to be approached with nuance and care.

## **1 Methodology**

### **1.1 Data collection**

The typology was created based on data collected for and presented in Deliverable 1.2. Data about countries were collected in County Datasheets (see the Annex in Deliverable 1.2). Fifteen countries were selected upon the basis of whether they contained either a Cooperative Heritage Lab or one of the Observatory Cases used in the project: Austria, England (UK), Flanders (BE), France, Germany, Hungary, Italy, Netherlands, Poland, Portugal, Romania,

Slovakia, Spain, Sweden, and Ukraine. Most were considered at the level of the nation-state, with the exception of England (UK) and Flanders (BE). Data was gathered through systematic documentary analysis supplemented by expert interviews and presented in the form of Country Overviews. These Country Overviews and the thematic analysis as developed in D1.2 were the starting point for the work on the typology.

Using these data and the thematic analysis we held various discussion sessions to identify those topics which appear to influence how adaptive heritage reuse happens or does not happen in the selected countries. Based on this we formulated indicative questions clustered around the four topics we identified: planning and policy, participatory governance, resources and finances, and heritage management aimed to address Research Question 1 (see Table 1). From here we developed both a quantitative analysis, to explore if we could score the countries on these topics and a qualitative analysis (where we summarised the long overviews into brief summaries addressing these topics), as well as create a more comprehensive, dynamic understanding of the situation and the main

direction of travel when it comes to adaptive reuse in a country.

<p><b>Heritage</b></p> <p><i>What is heritage in the law and policy? (protected monument – listed monuments – anywhere else in the system that implies it is treated as heritage, e.g. planning)</i></p> <p><i>Who decides / selects what is heritage?</i></p> <p><i>What is the objective of heritage law and policy? (protect - conserve – reuse...)</i></p> <p><i>What is protected (recognized as being of heritage value)?</i></p> <p><i>How extensively is it applied? (How many protected items?)</i></p> <p><i>How binding is the protection?</i></p> <p><i>Why are exactly these defined as valuable?</i></p> <p><i>What are the recognized and priority heritage values? (e.g. community value, national identity, aesthetic value, economic value...– In what respect is heritage seen as a resource?)</i></p>	<p><b>Planning → Regional integration</b></p> <p><i>How is planning structured? (fragmented, integrated, which level dominates..., planning culture - negotiation or rigidity)</i></p> <p><i>What is in the focus of development? (development, sustainability, aesthetics...)</i></p> <p><i>How is the change of use addressed in the law / policy? (of land, building...)</i></p> <p><i>How is temporary use addressed in the law / policy?</i></p> <p><i>How negotiable is the regulatory system when it is about adaptive reuse? (e.g. is accessibility negotiable in historical buildings? Is DIY / voluntary work, community work allowed?)</i></p> <p><i>How does the concept of adaptive reuse appear in the law / policy?</i></p> <p><i>How is heritage integrated into planning?</i></p> <p><i>Does the planning system stimulate regional / integrated thinking? (economic, cultural, across policy areas) How?</i></p>
<p><b>Governance → Community and stakeholder integration</b></p> <p><i>How complex is the system?</i></p> <p><i>How easy is it to navigate in the bureaucratic system?</i></p> <p><i>Who is expected to have the initiating role in adaptive heritage reuse projects?</i></p> <p><i>Who (in terms of institutions) has the expert / supporting role in adaptive heritage reuse projects? Where are expertises based?</i></p> <p><i>What is the role of assigned experts? (initiates, facilitates, supports, gives permissions, monitors...)</i></p> <p><i>How is community participation treated in law / policy? (Is it encouraged / facilitated...?)</i></p> <p><i>How developed is the culture of civic participation? Are there any tools in the legal and policy system to organize communities? (institutionalize, empower, financially support) How easy is to do this?</i></p> <p><i>Are partnerships encouraged in in adaptive heritage reuse? What kind of partnerships? How? (accountability, clear roles, risks...)</i></p>	<p><b>Finances → Resource integration</b></p> <p><i>What are the funding sources for AHR?</i></p> <p><i>How does ownership and organizational background of the project determine the available funding (and access to other resources)?</i></p> <p><i>What is the funding for? (e.g. only project-based funding or also for operation and maintenance; for materials, for construction, for programs and events, for research... - different pots of money)</i></p> <p><i>What are the incentives / disincentives (carrots and sticks)?</i></p> <p><i>How is the economic role of heritage defined? (e.g. a resource for tourism, for urban development.)</i></p> <p><i>How does financial sustainability appear in law and policy? (Is it an expectation to demonstrate this when applying? Is the focus on restoration or on viable use?)</i></p>

Table 1. Indicative questions clustered around four topics and their relation to the pillars of OpenHeritage



## 1.2 Quantitative methods: scoring and mapping

For the quantitative analysis, we identified the most important differences in each aspect covered by a set of questions above, by answering these latter for the different countries based on the Country Overviews, and where necessary, the Country Datasheets. The differences appeared along four main axes:

Axis 1: The policy system in some countries seems to be more risk-taking / flexible in permitting adaptive heritage reuse, while in other countries it is more risk averse/ inflexible. The key factor is whether the heritage protection system allows a flexible approach to accommodate adaptations for the reuse(s) of heritage sites. Thus, this category is mostly about heritage protection: are heritage conservation regulations strict, or flexible? Can heritage buildings easily be adjusted/ changed, or not? Does the system encourage risk taking (discretion for local regulators, allowing either strict application of regulations *or* flexibility depending upon circumstance) or is it risk averse (inflexible)? Furthermore, how open is the concept of heritage, i.e. does it refer only to a very specific list of buildings, or is it more broadly applied (e.g. including intangible, urban character, protected areas)?

Axis 2: The policies and institutional structures in some countries are more integrated, while in other countries these are more fragmented. This axis reflects on the systems of governance with a particular focus on the relationship between heritage management and spatial planning. The key question is whether policies of planning and heritage protection produce a coherent and comprehensible policy-context for adaptive reuse. i.e. how well are policy and institutional practices integrated horizontally (planning and heritage). Furthermore, how well are policy systems integrated vertically (levels of government) e.g. between regional and local government? Do countries have integrated ways of working on heritage and planning, i.e. are heritage and planning based within the same administrative department, and are applications for change to the historic environment decided upon by the same level of government? Are the systems of urban planning tools and heritage tools (mostly) separate or do they overlap? For example, do they have tools in common (e.g. conservation areas, integrated masterplans, integrated land use plans, etc.)? Does a lack of integration and collaboration both vertically and horizontally, lead to additional complexity in the system, and thus make decision-making to allow change more difficult?

Axis 3: Some policy systems explicitly encourage civic engagement in the adaptive reuse of heritage and related areas, while other countries have a more neutral position or can effectively discourage such engagement (Directorate-General for Education, Youth, Sport and Culture (European Commission) 2018). The key question is whether civic engagement in adaptive reuse projects is encouraged by the institutional systems of planning and heritage protection and legally enabled? Is there a legal possibility for people to participate? If so, how deeply does this extend and how is it supported? Is engagement actively encouraged and resourced (incentives, supporting different organisational structures, creating platforms) for in terms of time, money, access, or, if civic engagement is happening, is it outside of (and perhaps despite) the system?

Axis 4: In some countries, those who start an adaptive heritage reuse project, can rely on a well-resourced context in terms of both funding (public and/ or private)

and capacity (e.g. available experts, knowledge, information, support), while other countries do not have such resources. The key question in this respect is whether the institutional system offers any resources or fiscal incentives to adaptive heritage reuse, and whether there are available professional staff resources and organisations to support such projects? What kind of incentives, grants, tax reductions, waivers are available, and is it only for listed buildings (protected monuments), or also for a broader range of heritage reuse projects? Are they available for sites in private ownership too? Are there funding schemes with other objectives that can be 'bent' to use on projects of heritage adaptive reuse? Are there experts (as part of the system) to support adaptive reuse, do research, provide guidance materials, help groups who want to undertake such a project?

Three researchers gave relative scores to each country respectively, between 1 and 4 along these four axes, where

- 1 marks the most inflexible, 4 the most flexible in comparison;
- 1 marks the least integrated, 4 the most integrated policy system;
- 1 marks the system that encourages the least civic engagement, while 4 marks the one that encourages it the most;
- and 1 marks the most poorly resourced system, while 4 marks the system that is the most well-resourced.

These scores correspond with findings in D1.2 where a flexible, integrated, well-resourced system where civic engagement is encouraged seems to be the best breeding ground for adaptive reuse practices. The scores were processed with cluster analysis and arithmetic methods.

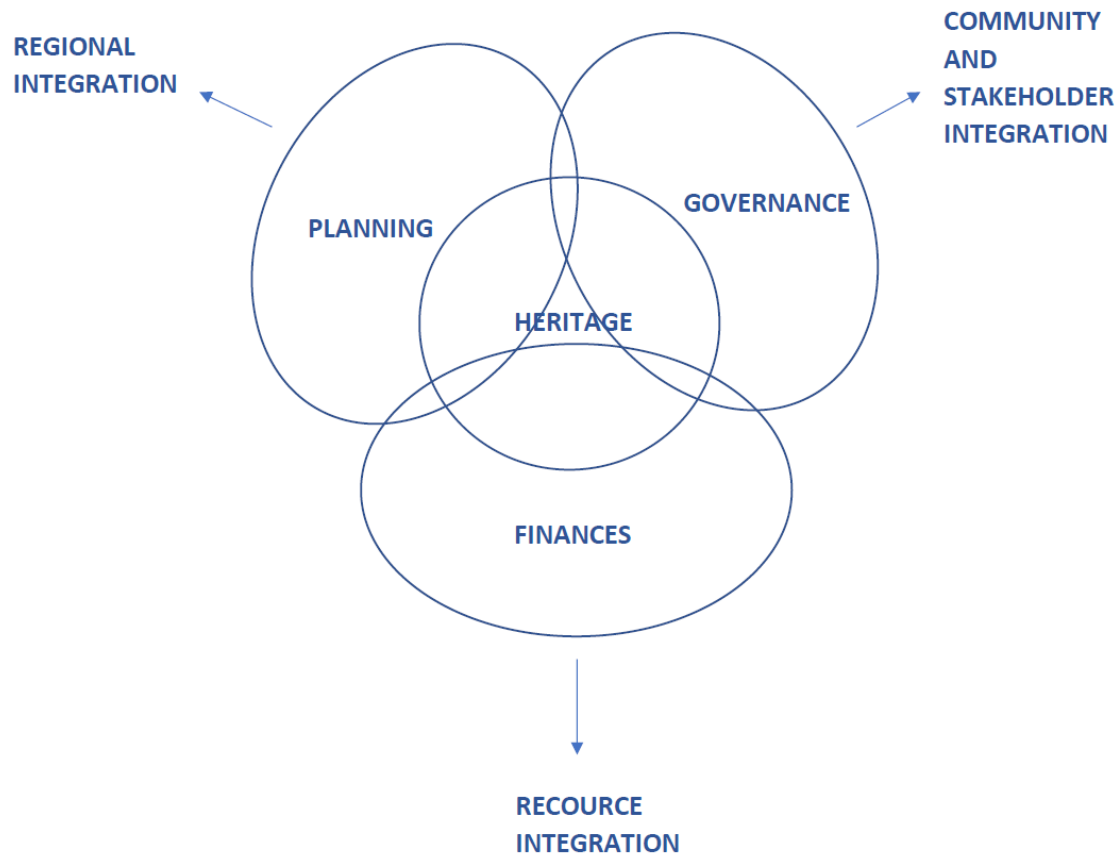
Clustering algorithms use the distance in multidimensional space to separate observations into different groups. The cluster analysis was performed with the Statsoft Statistica program. First, we ran a hierarchical clustering (or tree-clustering) to determine the optimal number of clusters, then a k-means clustering analysis to identify the clusters. Arithmetic analysis based on the arithmetic average of the scores was another method to identify groups among the countries.

Quantitative methods produced groups or clusters, indicated how distinct these groups are, and also helped to identify which are the most influential factors from among the four dimensions – flexibility, the level of integration, the availability of resources, and the level of encouraging civic engagement – when facilitating adaptive heritage reuse projects. The reasons behind the differences and similarities were further explored with qualitative methods.

### **1.3 Qualitative methods: summaries and thematic analysis**

Parallel to the quantitative analysis, a qualitative analysis was undertaken, following the identified themes to group the countries' approaches to adaptive reuse and recognise patterns. The policy aspects enabling or supporting adaptive heritage reuse identified in the long Country Overviews (D1.2) address the broader areas of Planning, Governance, and Finances, correspond to the three pillars of OpenHeritage: Regional integration, Community and stakeholder integration, and Resource integration, while Heritage is there in all three areas

when targeting adaptive heritage reuse (Graph 1).



*Graph 1. Policy areas and their relation to the three pillars of OpenHeritage*

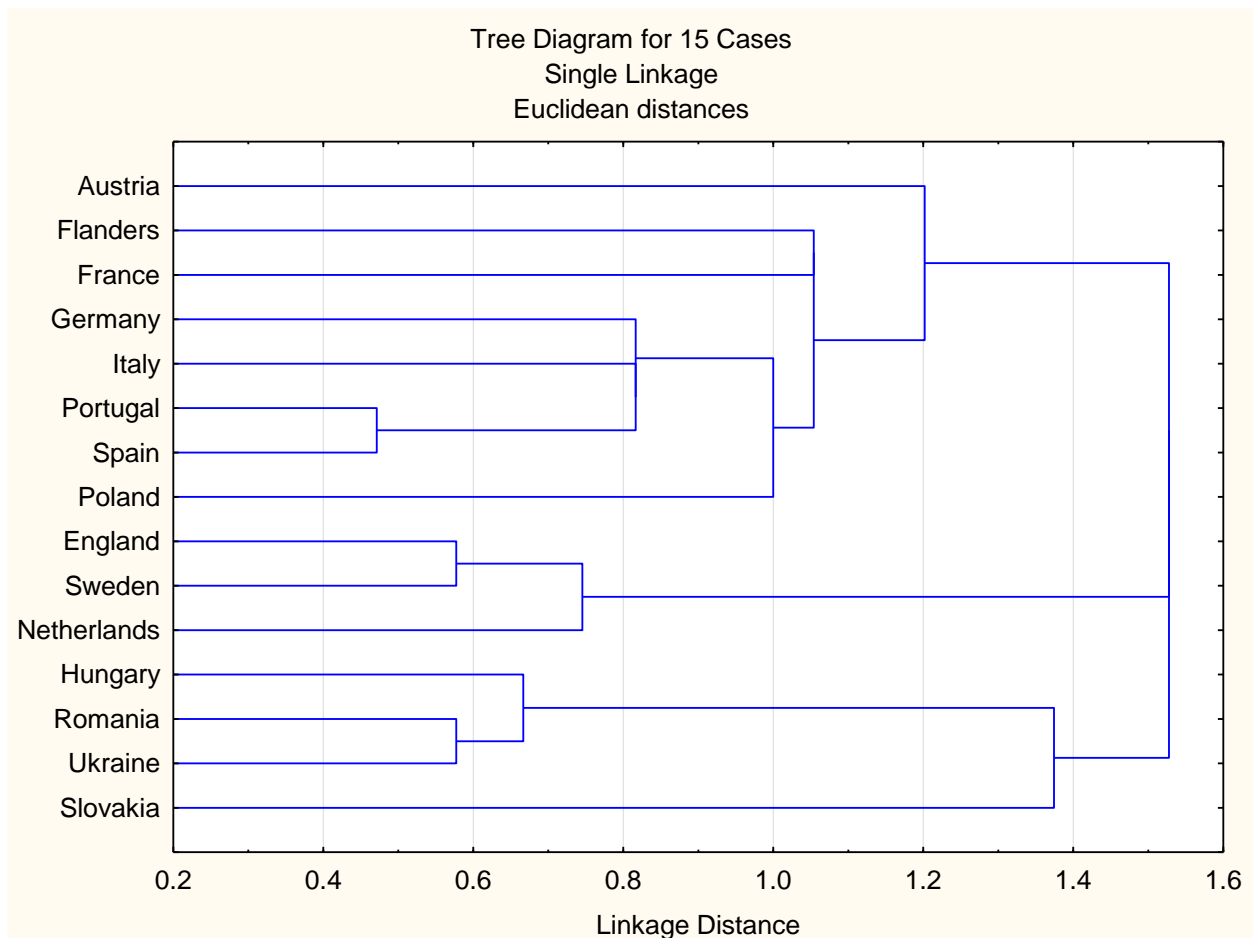
First, the policy overviews as presented in the Country Overviews were summarized using the three pillars, by outlining their most important characteristics in “adaptive heritage reuse country profiles”, 1-page summaries (see Chapter 4). These were subsequently reviewed by the original authors of the longer Country Overviews (D1.2).

These “adaptive heritage reuse profiles” served as the basis for organizing the selected countries into groups, based on the most characteristic trends in policies concerning adaptive heritage reuse.

## 2 Results

### 2.1 Typology along quantitative analysis

#### Four-dimensional cluster analysis



Graph 2. Tree diagram for the policy system of the 15 countries

The cluster dendrogram composed by hierarchical clustering (or tree-clustering) shows the sequence of combinations of the clusters (Graph 2). The distances of merges between clusters, called heights, are illustrated on the horizontal axis. It allowed us to assume what is the optimal number of clusters (3 or 4). The subsequent k-means clustering analysis partitioned  $n$  observations into  $k$  clusters in which each observation belongs to the cluster with the closest average – this resulted in groups of countries which are the most similar to each other. We run these calculations for three and four clusters.

Based on the Euclidean distances in the four-dimensional space between countries, where the four dimensions are flexibility, the level of integration, the availability of resources, and the level of encouraging civic engagement, one can identify either three or four distinct clusters. If it is three clusters, the countries appear like this (countries are ordered alphabetically within each cluster):

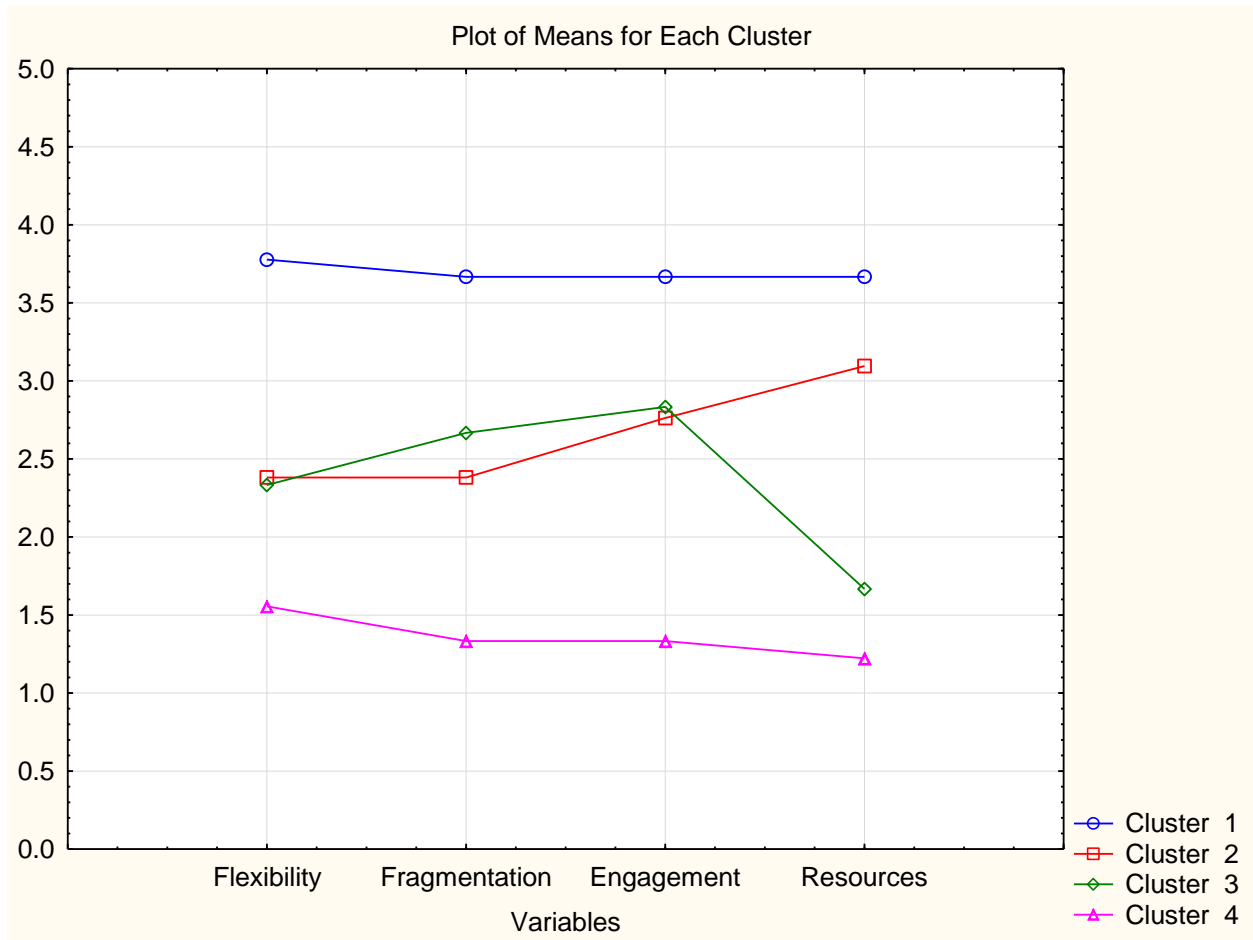
- Cluster 1: England, Netherlands, Sweden
- Cluster 2: Austria, Flanders, France, Germany, Italy, Poland, Portugal, Spain
- Cluster 3: Hungary, Romania, Slovakia, Ukraine

If it is four clusters:

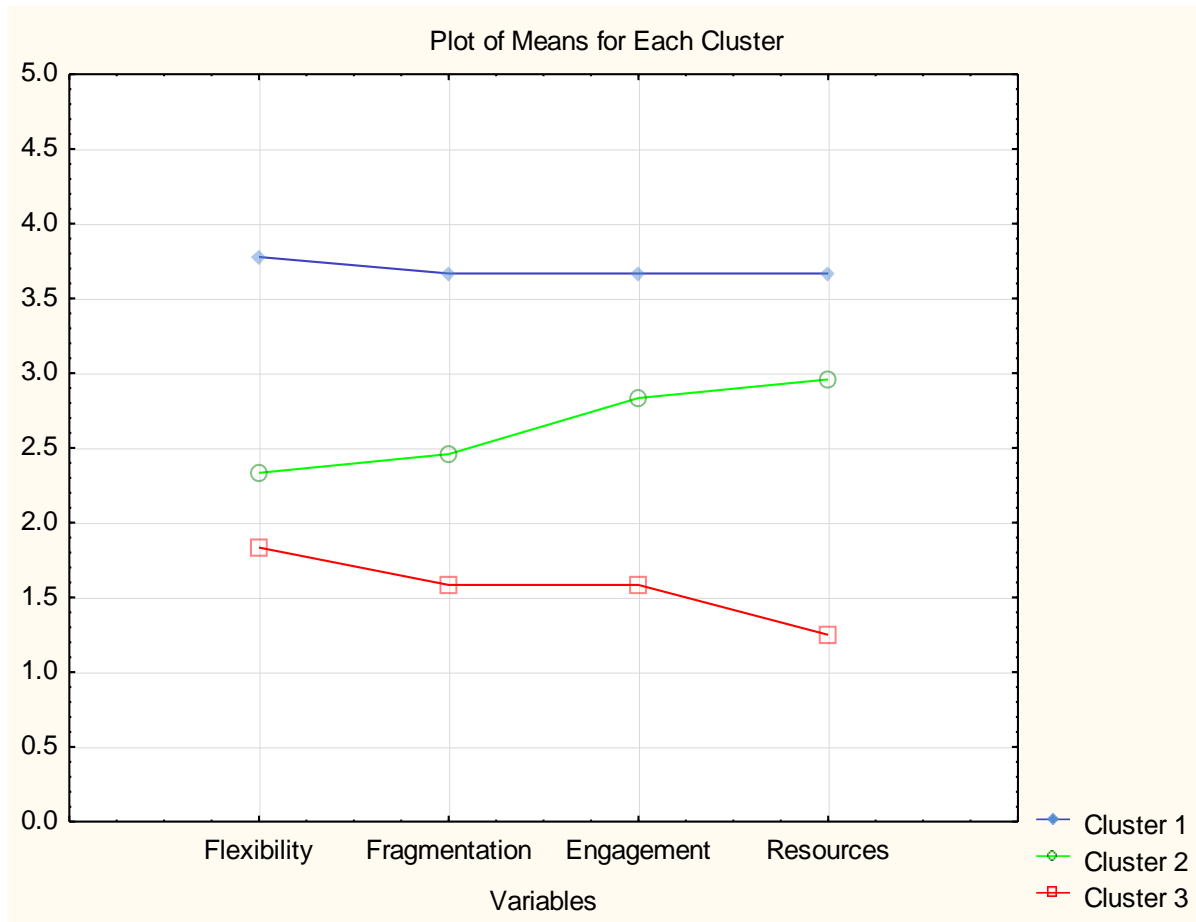
- Cluster 1: England, Netherlands, Sweden
- Cluster 2: Austria, Flanders, France, Germany, Italy, Portugal, Spain
- Cluster 3: Poland, Slovakia
- Cluster 4: Hungary, Romania, Ukraine

The clusters at the two ends consist of England, Netherlands, Sweden and Hungary, Romania, Ukraine in both cases. Flanders, France, Germany, Italy, Portugal, and Spain are in a third cluster between these two. However, Slovakia can be grouped together with the other three Eastern European countries when working with three clusters, while when there are four clusters, it is closer to Poland than those. What also can be observed in the four-dimensional tree chart, is that Poland, Slovakia, and Austria appear as the most different from the rest of the countries, even if they can be fit into various clusters.

To sum up, Hungary, Ukraine, Romania and Sweden, Netherlands, England have the most similar systems respectively, the former with more difficult conditions for adaptive heritage reuse, while the latter group very much supporting it. There rest of the countries are somewhere in-between in this respect, displaying more diversity. Depending on which aspects one is looking at, they can be grouped various ways, and in a certain aspect, Slovakia is even closer to the other Central-Eastern European countries. Graph No. 3 and 4 indicates that this aspect is how well-resourced the system is, and in this is true for Poland as well.



Graph 3. Plot of means for four clusters along the four variables



Graph 4. Plot of means for three clusters along the four variables

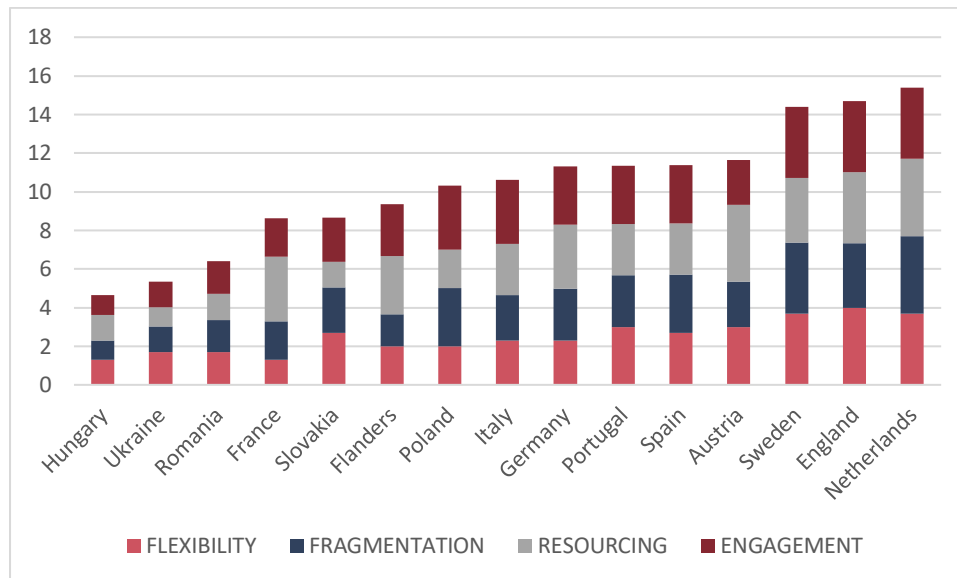
In the relatively diverse middle group, the relationship between resources and flexibility is diverse, but can combine to create similar effects. If a heritage management system is inflexible, but it is well resourced, adaptive reuse can still happen. Equally, an underfunded but more flexible system may allow adaptive reuse. However, as the third group shows, an underfunded and inflexible system, creates a lot of blockages (see also Graph 5).

Based on the Euclidean distances, countries with an enormous number of historical monuments and significant traditions in monument protection – Germany, Italy, and France – appear close in their policy systems. The clusters also reflect geographical regions in a certain respect: the western, southern, and eastern part of the continent seem to be somewhat distinct. The question to examine in the qualitative analysis is what the nature of these differences and similarities is, and what are the factors behind their emergence?

### Arithmetic method

Out of a possible range between 0 and 4, the scoring method reveals a spectrum of scores ranging between 1.2 (Hungary) and 3.8 (Netherlands) based on the arithmetic average of the scores (Graph 5). This indicates that there is a difference in the policy environment between the countries we analysed: in some countries adaptive reuse is supported more than in others. Two groups visibly stand out at the upper and the lower end of the chart: Sweden, England, and the

Netherlands have policy systems which very much support adaptive heritage reuse, while Hungary, Ukraine, and Romania appear as a group at the other end of the spectrum. Differences are smaller between the countries in the middle. All these correspond to the results of the 4D cluster analysis.



Graph 5. Ranking of countries based on the arithmetic average of scores

The stacked column chart indicates that especially when resources are low, the entire system suffers, again similarly to the results of the four-dimensional cluster analysis.

Two arithmetical methods were used to divide the countries into different groups according to their scores: first, by separating the spectrum of scores into equal intervals; second, by identifying the largest differences among countries in the sequences (ordered by score). These methods were applied to produce at least two groups and as a maximum five groups (See annex 2).

When comparing these two methods of grouping the countries according to the scores, it is notable that in one instance the results overlap – when organizing into three equal intervals as well as according to the two largest differences:

- Hungary, Ukraine, Romania
- France, Slovakia, Flanders, Poland, Italy, Germany, Portugal, Spain, Austria
- Sweden, England, Netherlands

This arithmetic method does not help to find the explanation for the continuities and discontinuities among the groups but resulted in the same image as the cluster analysis: confirmed the two distinct groups at the two ends of the spectrum and the more diverse, middle group, with Slovakia and Poland 'moving' in between the groups. Notably, here Poland appears in some instances even further from the rest of the Central-Eastern European countries.



## 2.2 Typology along qualitative analysis of policy patterns

Based on our qualitative analysis, using the findings of the long Country Overviews and thematic analysis (D1.2) and the “adaptive heritage reuse country profiles” we identified policy patterns related to adaptive heritage reuse. The scoring as presented above shows the levels of e.g. flexibility and resources but does not integrate the various factors into a more comprehensive understanding of how they (inter)relate, and how this differs in various countries with similar scores. In the qualitative approach to the Typology we have identified three main groups and tried to address how certain variables affect each other as well as how they affect adaptive reuse.

### **Group 1. Adaptive Heritage Reuse: common and facilitated**

#### ***Austria, England, Germany, Netherlands, Sweden***

Adaptive reuse was already becoming more common / supported pre-crisis, and this focus increased with post 2008 recovery / planning frameworks.

In these countries the regulatory frameworks for Heritage and Planning are well integrated on a national level (either through policy or in law). Levels of government tend to have fairly clear relations, roles and responsibilities in the process, with the local level usually being the place where decision making happens for both. Discretion on the local level can create a risk (they can decide to say no) but is often seen as helpful, as it creates a ‘grey’ space where change and significance can be negotiated.

Approach to heritage tends to be more flexible. Even if heritage regulations in principle can be strict, there is a focus on bringing buildings back into use, and ‘using’ heritage to contribute to sustainability and/or quality of life and environment rather than to build ‘national identity’ or material conservation of ‘cultural property’.

These systems are well resourced in terms of capacity (people, time) and often also have funding schemes in place as well as tax or VAT incentives. Some have a clear heritage focus, but ‘restoration’ tends to be focussed on ‘bringing back into use’, with option to negotiate material change. These countries also tend to have other policies and programmes that integrate and stimulate reuse over new built (e.g. housing, sustainability, culture).

Bottom up approaches are not by default happening, but a clear to navigate system and in some cases also support for community groups in the process, will make them more likely and possible.

### **Group 2. Adaptive Heritage Reuse: somewhat established as a practice or coming up, regulatory framework with some obstacles but trends towards more flexibilities**

#### ***Flanders, France, Italy, Poland, Portugal, Spain.***

The focus on adaptive reuse only started to appear in the post 2008 recovery context more seriously, often in the context of tourism and/or regeneration schemes as stimulated through EU policy steers and funds. This is also changing

the approach to heritage from a focus on e.g. building 'national identity' or protecting 'cultural property' to heritage for economic development.

In these countries complexity and contradictions within the planning and heritage systems, create hurdles for adaptive reuse projects, and make them less attractive. Most are in the process of addressing these issues. In these systems the other hurdle can be that issues on heritage are decided on another (e.g. regional or national) level whereas planning is decided on a local level. A lack of institutional capacity and funding can lead to long procedural times (e.g. when all local applications need regional approval).

Aligning building regulations with reuse (they were focussed on new construction) usually through local level discretion and introducing the idea of 'proportional and progressive improvements' on making building regulations work within the context of heritage, are starting to make adaptive reuse easier.

Some of these countries have a very strong and rather inflexible regulatory systems for heritage, which can be well resourced in themselves, but focussed on protection rather than reuse. This can make adaptive reuse practices more difficult.

Funding and support for adaptive reuse in these countries tends to come from non-heritage sources (e.g. regeneration, tourism, social or sustainable development policies), especially when the heritage system is strict and related funding is only applicable to (nationally) listed buildings.

This complexity makes bottom up projects more difficult, as navigating the system can be difficult, especially for those without the experience and/or capacity to do so.

### **Group 3. Adaptive Heritage Reuse: difficult**

#### ***Hungary, Romania, Slovakia, Ukraine***

Adaptive reuse is happening despite the system. Even if the idea of adaptive reuse gradually becomes more common, it is not facilitated or funded.

Heritage and planning decision making are done on different levels or by separate authorities (e.g. local government and devolved regional office). The heritage system in these countries is rather inflexible, with a focus on material conservation and avoiding change. The possibilities for change tend to increase with economic /development pressures or needs, increasingly using heritage for economic development.

If there is public investment for adaptive reuse, it tends to be through external funding or policy steers (e.g. tourism and/or regeneration schemes). Heritage funding in contrast, if available at all, applies strictly to (nationally) listed buildings. The same for any tax incentives or low interest loans.

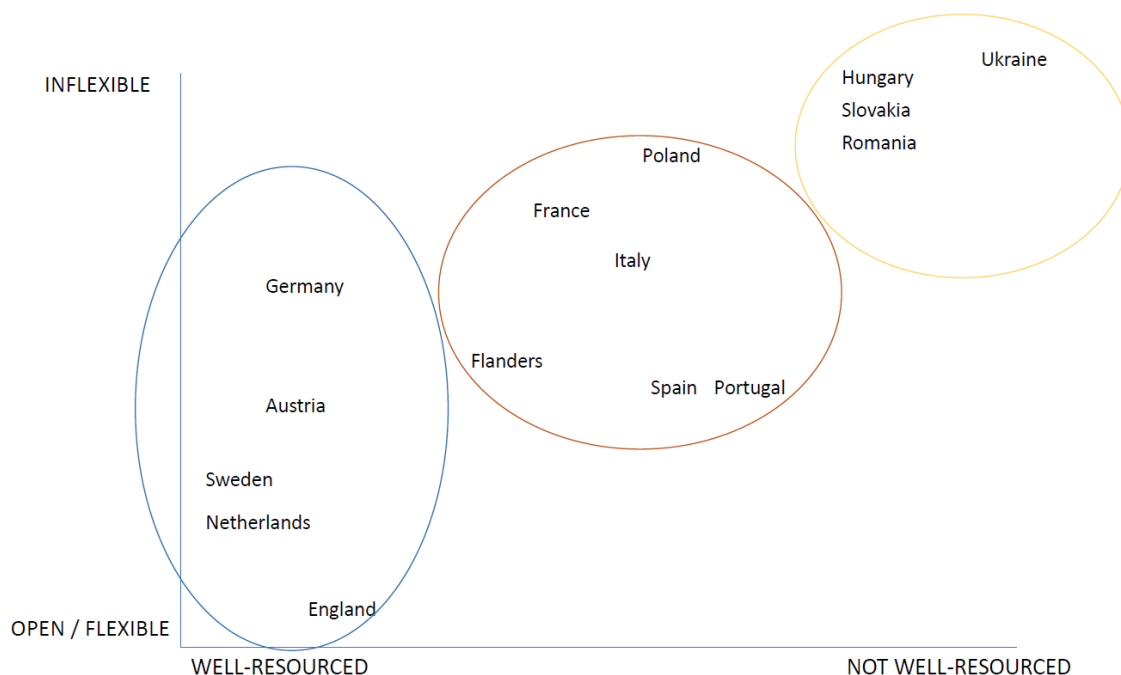
A general lack of funding and resources, and a lack of experts and capacity in the institutional system are clear obstacles, even where (local) governments have the discretion and the willingness to support adaptive reuse. It also leads to long procedural times (e.g. when all local applications need regional approval).

Moreover, unstable policy contexts – e.g. outdated or rapidly changing, complexity, making exceptions for political / economic reasons, lack of implementation of policy, lack of enforcement, are making navigating the system difficult.

Bottom up practices not encouraged, volunteers (as experts) fill some of these gaps, but this doesn't fix the structural gap.

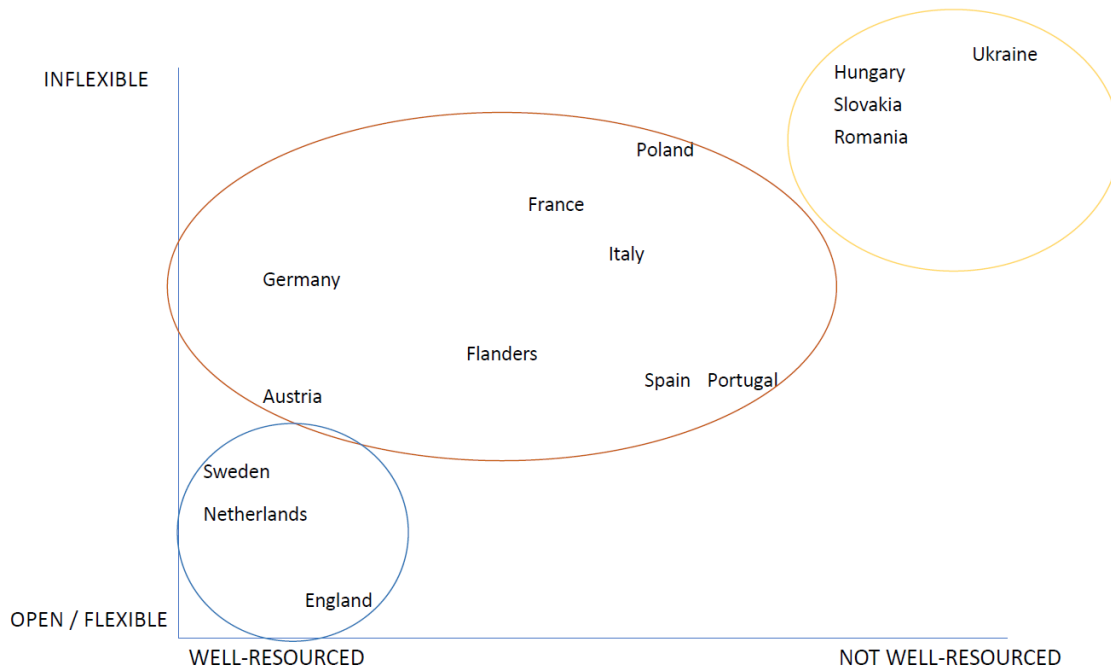
### 2.3 Typology along key variables of adaptive heritage reuse

Based on the identification of policy patterns and the interpretation of the cluster analysis, we have identified two key variables that are repeatedly referenced as influential for adaptive heritage reuse. First, is the policy and institutional system well-resourced to support adaptive heritage reuse? Second, does the policy and institutional system allow for enough bureaucratic flexibility and legal openness to engage with the specific demands and tailor-made solutions of adaptive heritage reuse? Each variable is a dimension in the graph below. The following graph (Graph 6) with unique positions for each country is based on the assessed relation of countries towards each other in view of the two dimensions. Overall, the locations of the countries on the graph suggest a certain correlation between flexibility and the variable of resources. However, it also shows that these countries are not neatly aligned on such a line. The groups show some overlaps in view of the question of flexibility, but they are clearly differentiated by the perceived degree of resourcing in various countries.



Graph 6. Comparison of countries in terms of resources and flexibility; grouping 1

This graph proposes the same groupings as indicated in Section 2.3. However, it also allows to identify the three clusters of the 4D cluster analysis (See Graph 7). The graph allows for a more differentiated view on the perceived differences within each group. Other groupings clearly could be imagined.



Graph 7. Comparison of countries in terms of resources and flexibility; grouping 2

This alternative schema places greater weight on the flexibility axis for grouping countries, with the consequence that Austria and Germany move to the central group (i.e. they are well resourced but somewhat inflexible in their heritage management policy practices).

## 2.4 Comparisons

When comparing the proposed groupings of 2.1 Quantitative analysis, 2.2 Qualitative analysis and 2.3 Analysis along key variables, the three group models have certain overlaps. These are

- Group one: Romania, Hungary Ukraine
- Group two: Italy, Spain, Portugal, France, Flanders
- Group three: Sweden, England, Netherlands

However, some countries cannot be unambiguously placed in any cluster based on any of the methods:

- Countries between group one and two: Slovakia and Poland
- Countries between group two and three: Germany, Austria

In common with the other Central-Eastern European countries, neither Slovakia nor Poland has a specific legal basis for addressing adaptive heritage re-use and both have a relatively inflexible heritage system focusing on conservation,

moderately integrated with planning. At the same time, the idea of heritage as a resource in economic development is increasingly recognized in both countries, especially in tourism, and in Poland also in the revitalization of degraded areas. Consequently, the overall system seems to be in transformation towards more flexibility in these two countries compared to the other Central-Eastern European countries in our typology. However, the lack of resources seems to keep this transformation from its full potential.

In contrast, Germany and Austria have well-resourced systems but they appear rather inflexible compared to the rest of the countries with a similar level of resourcing. The regulation of heritage management is generally focused on protection in both countries, but in both cases, there are differences between various regions (Länder) in how the heritage sector is integrated with planning. This relative rigidity and lack of integrated approach in certain areas makes the environment less favourable for adaptive heritage reuse, but the resources invested into and successfully integrated by the system compensate for the general inflexibility.

The ambiguity of placing certain countries to clusters also points to the limitations of our approach: our scoring was biased due to the uneven knowledge of European policy systems. Due to the nature of our data, there are no clearly measurable variables, and we understand some countries more than others. It is also a source of bias that the more nuanced our understanding of a country is, the more we understand the issues and challenges in the system, which might have also influenced the scoring.

### 3 Conclusions

The multidimensional approach of quantitative scoring and qualitative grouping helps us assemble a typology. We can see groupings emerge, but it is also clear that within a complex assemblage of influences, including policies, policy practices, resourcing, political and policy priorities, multi-level governance structures and complex regulatory frameworks, planning traditions, heritage discourses, etc, there are many possible ways to group countries. The variations within and between groups can only be explained by looking at the whole system. In other words, there is no one single typology and countries can learn from each other on many aspects.

On both 'ends' of the spectrum there are countries which have strong similarities, either creating a more supportive or a less supportive environment for adaptive heritage reuse projects. However, there is a large group in the middle, where, for example, there is policy support but with limited resources, or the other way around. Importantly, groups cannot be seen as rigid, because whilst some of the variables are rooted in tradition (e.g. planning traditions, heritage discourse) and will take time to change, others such as funding, can change fairly quickly, and consequently influence the whole assemblage. For example, there are significant changes caused by the end of the Soviet-backed socialist regimes, changes related to EU integration and responses to the economic crisis in 2007/8. In this respect we are in a period likely to lead to change consequent on the COVID pandemic; the response strategies of various countries will almost certainly influence the policy and resourcing environment for adaptive reuse.

#### **We identified three typology groups by qualitative analysis:**

- 1. Adaptive Heritage Reuse: is common and facilitated**
- 2. Adaptive Heritage Reuse: somewhat established as a practice or coming up, regulatory framework with some obstacles but trends towards more flexibilities**
- 3. Adaptive Heritage Reuse: is difficult**

However, as the quantitative analysis demonstrated, some specific countries do not have a fixed position in any group, depending on where the emphasis is put. These typological groups are characterized based on multiple variables, so countries can be placed on various axes leading across the groups, and this might influence their group placement too. Furthermore, policy systems are in constant change due to different, internal and external factors, so countries can also move from one typological group to the other. To sum up, we have sufficient confidence in the trends observed to establish typological categories but the positioning of individual countries in these categories comes with a degree of provisionality.

The thematic analysis in Deliverable 1.2 revealed that certain aspects of the policy context have a significant influence upon the feasibility of adaptive heritage reuse projects. For example, discretion in decision making at the local level tends to support choosing the most suitable solutions which benefit the social and economic development of the area and, at the same time, preserve and promote the heritage values of the site, although it doesn't guarantee a

certain outcome of course. Moreover, we saw that adaptive reuse was supported better when the local level was well-integrated into a multilevel governance system where every level is connected both vertically and horizontally, and heritage and planning are also dealt with via an integrative approach. This often connects with heritage being treated as a resource for development, and development is understood as a means of preserving heritage. In addition to all these factors, resourcing and the integration of resources – importantly, more widely than project funding including how the ‘system is resourced’ – seems to be a highly influential aspect. This is perhaps not surprising; a governance context that channels sufficient resources to the institutional system and projects supporting adaptive heritage reuse can better cope with a higher inflexibility of that system. This is especially visible in the more diverse middle group, where the major difference between the countries can be identified in the level of resourcing and the level of flexibility.

OpenHeritage is specifically interested in those adaptive heritage reuse projects which involve and benefit the local and broader communities. Countries examined in the typology display a variety in this respect too. Some countries focus on creating space for participatory governance (e.g. through ‘commoning’ principles), others support third sector organisations and volunteer work, or invest in what can be considered bottom up projects. Participation as it appears in policies also varies in terms of impact on power and decision making (Arnstein 1969; Fung 2006). Where civic initiatives are supported or just tolerated, this can compensate to some extent for the lack of resources in the system. In such cases, adaptive heritage reuse can happen ‘in spite of’ the system. Bottom-up initiatives can identify local gaps they can turn into their benefit (and to that of the heritage). However, sharing and learning in these cases is hard as there often is no coordinated knowledge gathering, nor is there security through an underpinning favourable legal or policy system. Moreover, in a highly inflexible system, it can be difficult for non-experts to have a voice in what happens to heritage, and to navigate these systems is often complex.

The impact of the two aspects we see as crucial, that is discretion and involvement in decision making and resourcing (both accessibility to resources and a well-resourced system), is closely interrelated in supporting adaptive heritage reuse. Countries have different historical traditions in this respect, which will significantly influence any transferability of models. Due to this, clusters seem to correspond to historical geographic regions (along the ‘West’-‘East’ and ‘North’-‘South’ of Europe). The underlying problem is a political economic question of power and public sector financing.

The question of “resources” is fundamental to maintaining a functioning and integrated bureaucracy and planning and heritage protection system. If there are resources, conflicts between scales or among authorities can be mediated, civic initiatives can be advised or supported, participatory processes can be initiated and substantiated, court cases can be fought, etc. Without resources, conflicts are usually won by those with the biggest political or economic power.

In the case of flexibility or discretion, if development is prioritized one-sidedly by the state power, experts in the heritage institutional system fight for conservation of heritage without any flexibility unless they have sufficient resources at disposal to influence developments. In order for the heritage

experts to take a more open approach and confidently negotiate, they must be empowered through having access to sufficient resources and decision-making be integrated with other decision-makers. If there is a lack of such resources, bottom-up initiatives can mitigate the negative impact to a certain extent, if supported or tolerated by the state.

These factors in combination impact the conditions of transferability of adaptive heritage reuse models as opportunities or limitations – similar solutions are expected to work better in similar contexts. Groups or clusters created in this typology are not intended as a ranking system of countries, but to help to identify the groupings that can offer the most suitable models for adaptive heritage reuse projects that are likely to be applicable in a specific context. However, as discussed above, while certain aspects of the policy systems are slow to change, others can be easier to set in motion by reorganizing resources or finding the niches for partnerships or bottom-up initiatives. Finally, successful adaptive heritage reuse projects also have the potential in turn to influence policies.



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## 4 Country summaries

*Table 21: the fifteen countries OpenHeritage has case studies in*

AT	Austria	HU	Hungary	RO	Romania
FL	Belgium (Flanders)	IT	Italy	SK	Slovakia
EN	UK (England)	NL	Netherlands	ES	Spain
FR	France	PL	Poland	SE	Sweden
DE	Germany	PT	Portugal	UA	Ukraine

## **Austria**

### **Adaptive reuse**

In Austria, adaptive reuse is becoming normalised within planning / architectural practices, for example through a national Building Culture policy programme, which aims for a holistic (regulatory) approach to the built environment. This Building Culture programme aims for supporting reuse, high quality architecture, and reducing land use. National government also support the adaptive reuse of heritage buildings they own. This happens through culture and heritage programmes, but also other routes, e.g. the Business ministry provides funds for locating a business in an old / post-industrial building / area.

### **Policy Integration**

Austria has a land-use based planning system, and a federal government structure. On national level planning is coordinated by several ministries. Although there is no national planning law, but considerable influence on planning through e.g. the Austrian Spatial Development Concept. Planning is coordinated on and across all levels of government with an emphasis on the Länder (federal states) setting the regulatory framework and the local level which has the executive and operational powers when it comes to planning and land-use changes. The strength of the regional level means priorities can vary per Länder, and heritage is seen as core for urban renewal in some, but not in others. As such the level of integration of heritage and planning varies from state to state.

Heritage listing happens on national level, and each Länder has conservators to implement and enforce. There is an up-to-date inventory of monuments – indicating a well-resourced system. The Federal Monuments Authority is seen as dialogue oriented. Heritage is seen as public good and is considered important in terms of regional identity. It is mainly used for urban regeneration and tourism agendas. There is a strong emphasis on environmental sustainability within the heritage agenda too.

Building regulations are issued on Länder level, and they are being harmonised through the “baukultur” programme, including increased sustainability requirements in conservation and construction.

### **Resource integration**

There is a significant (and at times rather complex) infrastructure of government funded as well as independent organisations and associations with (some) focus on heritage and adaptive reuse. There are various local and national funds to support reuse and restoration; some Länder have incentives for monument owners e.g. repair costs for monuments can be deducted by owners (person / company) and old buildings have lower property tax. There are policy programmes in place that support in particular the creative industries to reuse industrial heritage (and stimulate private sector investments).

### **Stakeholder integration**

Austria knows strong regional identities and, built on that, a strong tradition of civic engagement and activity, generally in good cooperation with public actors (PPP). There are policy programmes and funding infrastructures in place to support civic participation and localism in urban and rural areas, partly funded through EU money (e.g. interregional and rural development).

## England

### Adaptive reuse

In England (we focus on England, not the UK as the four devolved nations have slightly different planning and heritage systems), adaptive reuse – as a term – is not often used, and not mentioned in policy, but as a practice it is normalised, often under the term conservation or restoration. The National Planning Policy Framework (for England, NPPF, 2019) for example, explicitly aims to conserve and enhance heritage and put it to (new) use.

### Policy integration

England's planning system is heavily centralised, and there is often felt to be a disconnect between national and local level, more so since 2010, when regional government levels were abolished. On national level heritage and planning are well integrated as the regulatory framework for the historic environment and (built) heritage sits within the planning law and policy. Heritage is broadly defined and includes much more than listed buildings and conservation areas. On the local level planning and conservation officers have a lot of discretion to make decisions when it comes to adaptive reuse. Their job is to weigh community benefits of a project proposal against the potential harm to significance of the asset or area. Building regulations are (within limits) adjustable in case of listed building.

### Resource Integration

Heritage is seen as a resource for economic and urban regeneration. It is mostly companies, NGO's, and local community groups that undertake heritage reuse projects, privately, grant or loan funded. There is an active heritage sector, and Historic England is a well-resourced national heritage agency, whilst their project funding capacity is limited, they are providing other resources e.g. knowledge, time and coordination. Recent policy and funding programmes (e.g. Heritage Action Zones; Historic Highstreets) all have components that explicitly resource and stimulate the reuse of the historic environment. In general, funding for heritage is shifting from focus on material to focus on use, programming, events, and people. More and more, funding also comes through 'other' sectors, e.g. creative industries, regional economic development (e.g. through Local Economic Partnerships), or skill building programmes. Integration between funders is also increasing, e.g. Arts Council money now include the possibility to use some of the grant money for capital works. An issue for reuse projects is that the current 20% VAT on maintenance and restoration is a significant disincentive, especially since it is 0% on new construction. There are reduced business rates (tax) for owners of vacant listed buildings. Alternative funding e.g. social investment, community shares / bonds, crowdfunding, and asset transfer, are being explored in some cases.

### Stakeholder Integration

Participative planning and heritage management are possible at local level e.g. through community asset transfer and neighbourhood planning. There is a strong culture of local community groups, trusts, and other organisations that lobby for or undertake projects, and there are also many volunteer groups across the country (e.g. doing local history, heritage & reuse projects, providing heritage skills training). The sector is also supported (with knowledge, representation) through national and regional professional networks such as the Heritage Alliance, IHBC and Heritage Trust Network.

## Flanders

### Adaptive Reuse

In Flanders (not Belgium as the core planning and heritage responsibilities are devolved to the three regions: Flanders, Wallonia, Brussels), there is a growing policy push for adaptive reuse. It is emerging both as an issue in the heritage context (reuse to conserve, ensuring continuity) and within more general environmental considerations such as sustainability and regional identity.

### Policy Integration

Flanders has a land-use based system, with planning and heritage responsibilities on the regional level (Flanders), as well as on sub-regional (provinces) and local (municipalities) level. Heritage gets listed on Flanders level, but is managed and operationalised on provincial level, whilst local level does not have much power in terms of heritage management. The planning system is complex, and Flanders is currently aiming to – but struggling to – make the system more coherent and transparent, with special attention to the co-creation of policies and plans between different levels of government, as well as in intermunicipal plans (including intermunicipal heritage plans). The three-tier system in the region is fragmented, and this makes cooperation hard, and creates further complexity through the varieties across levels and localities. There is also the aim to better integrate heritage and planning policies. The perception is that there is a fairly flexible understanding of heritage in practice, but a strict institutional context of rules and regulations. Complexity seems a bigger issue to overcome than flexibility.

### Resource integration

Heritage is seen as an important element in spatial development, in terms of sustaining identity. A relatively complex set of funding opportunities and incentives for heritage is well resourced in some places, and not in others. The many (too many?) organisations involved are mainly charitable, and (semi) governmental, but also sometime for-profit.

Support comes not just in the form of funding, but also knowledge sharing and guidance for reuse: for projects, as well as for process and/or financial management, developing funding tools, helping in partnership building etc. There is increased government funding for heritage (over the past 15 years) but still the need is much higher than the available funding. This includes various governmental grants for the 'infrastructure' of organisations as well as project funding, heritage-loans, subsidies and tax incentives. Funding mechanisms, however, seem to focus mostly on Flanders level; whilst management responsibilities are devolved to provincial and local level.

### Stakeholder Integration

Heritage in Flanders is also seen as a means of creating communities and emphasising regional identities. There is an emphasis on implementing the Faro convention, supporting local communities to engage with heritage, offer advice online, and funding. However, perception (for heritage) is top-down. There is often no or little local heritage policy and knowledge, and thus not much support possible for local initiatives, or attention for local values.

## France

### Adaptive reuse

In France, adaptive reuse is possible, but not particularly stimulated or supported. Heritage policies focus on conservation, but even if not explicitly mentioned in policy, conservation projects can also be reuse projects. Municipalities can designate areas and zones to protect and enhance built heritage which allow more flexible regulations to enable heritage-based development. Various non-heritage policies support adaptive re-use e.g. sustainability, housing provision, participation and innovation. Despite this, there are no distinctive reuse trends beyond a new wave of 'facadism'.

### Policy integration

France knows many government levels: national, regions, departments, districts or arrondissements, cantons and communes. This creates problems of duplication, co-ordination and confusion of roles in planning and heritage management, and thus potentially for adaptive reuse projects. These sub-divisions may have an administrative, electoral, and/or political purpose, but do not have legislative power. Heritage is rather strictly regulated, and the system is top-down. Planning and heritage are regulated and changes to listed heritage are often decided upon at the national level, implemented at regional level via strategies. There is also an inter-municipal and local level of planning to reinforce the need for cooperation and taking account of sustainable development. At municipal level, heritage protection and management are integrated into the decision-making processes on urban planning and development.

### Resource Integration

There is quite generous state funding for the renovation of listed buildings as well as significant tax incentives and loan schemes. Still, in general, the public sector lacks the proper funds for the extensive heritage that exists in France, and especially smaller communes have few resources for conservation and thus reuse. Public access is a precondition of eligibility for state funding; accordingly, the focus of support is the exterior of the building. Grants for the rehabilitation of housing assets are also available. There are a few opportunities to apply for public funds to support private buildings, but money comes for private property mostly from private funding. There is a significant expert support system: regionally and locally there are experts at the municipalities to offer conservation related advice for developers, and the National Commission for Historic Monuments provides expert advice and opinion on designation proposals, modifications to protected or inscribed buildings, and on projects and programmes relating to monuments. The focus is on formally identified heritage.

### Stakeholder Integration

The French system is dominated by strong public authorities. The public and private sectors operate quite separately with few examples of collaboration. Grassroot initiatives for adaptive reuse projects seem rare due to the lack of funding opportunities. As a rare example for organized citizen involvement, Neighbourhood Councils offer an opportunity for discussions and sharing information about neighbourhood development. Moreover, some public or third-sector institutions foster the discourse relating to cultural heritage and re-use of buildings and bring together associations and individuals who advocate for sustainable development, protection of the environment, and heritage.

## Germany

### Adaptive reuse

In Germany, adaptive reuse is a common practice, and the national policy programme on Urban Heritage Protection has been important in mainstreaming adaptive reuse within (urban) regeneration, with the aim to improve quality of life. Public or third-sector funding opportunities for adaptive reuse in rural regions, in comparison, is more difficult to acquire.

### Policy integration

Germany has a land-use based planning system, and federal structure with four tiers of government: national, regional (Länder), districts and municipalities. Heritage protection provisions are focused on preservation and allow for little flexibility when it comes to adaptive reuse. Heritage and planning are fairly well integrated throughout policy, as protection uses both heritage and planning frameworks / tools, and local development has to take heritage into account. The structure is complex, the state offices for heritage protection at Länder level decide on the preservation status for objects and the local level has the key competency to decide about protective measures. Approval for temporary use, however, is difficult to obtain. Heritage protection laws are passed at regional (Länder) level, but there is institutional coordination across different levels of government, across the Länder, and across local authorities in relation to planning and heritage. In cases of local heritage preservation statutes, some physical modification and change of use may be allowed. Complexity of regulations and funding programmes tends to favour large players who know or have capacity to find out how to navigate the system over small civic initiatives that lack the expertise and/or resources to do so.

### Resource Integration

Of particular importance is the direct public funding and resources for heritage preservation and reuse through the Urban Heritage Protection programme that has been in place since 1991. Local incentives depend very much on the priorities and wealth of the local authority. Various investment programmes (urban and rural regeneration, as well as culture, and more general social aims) are useful for stimulating adaptive reuse. There are public and private foundations that support the sector through (co-)funding as well as providing support, knowledge, networks, information, and guidance on process management and finances. In some cases, there are also interest free loans, various grants and subsidies by government, and tax-incentives for restoring and reusing heritage, i.e. generally listed objects.

### Stakeholder Integration

A lively civil society and public debate revolves around heritage and its reuse, and several civic initiatives, foundations, partially supported with public money exist that are concerned with built heritage. The heritage protection system is not oriented towards collaboration with civil society initiatives; however, heritage preservation agencies are increasingly realizing the importance of engaging the public and the Urban Heritage Protection program requires social engagement for funding to districts. Participation and civic engagement are important in the broader planning context and local civic initiatives are often the ones running adaptive reuse projects, primarily focusing on housing. Cooperative models are well known in housing and for public services and are also used in reuse projects. The complexity of the system can be a challenge for civic groups, as they often need some expert knowledge to navigate (funding, regulations, exemptions).



## Hungary

### Adaptive reuse

In Hungary, the concept of adaptive heritage reuse does not appear in the legislative or policy documents. Heritage is understood in terms of protected monuments, and material conservation without much attention for the (future) use.

### Policy integration

Hungary has centralised and complex planning and heritage protection systems, with devolved national government offices next to county and local authorities. Decisions about heritage and construction are made (permissions are given) at regional level. However, many different levels of government are responsible for various bits of planning, heritage, and building control. Heritage and planning are not integrated, they meet only at the local level, though not necessarily, as this is based on the approach of each municipality: they decide if they wish to deal with heritage in planning or not. At the local level of planning, the law allows to define a layer of heritage besides protected monuments, but this, as well as its protection and support is based on the discretion of the municipality. Regulations, structures, and responsibilities are changing rapidly, it is difficult to understand what currently applies, and exceptions are made lead by political and economic considerations. The latter, on a case-by-case basis, applies mostly to making exceptions for large-scale developers. Most of these developments target tourism since heritage is seen as a resource in that field.

### Resource Integration

There is not much support, advice, information available for people who want to undertake an adaptive reuse project. Most local projects are private developments, community financing is rare, and government resources are very limited and difficult to identify due to the chaotic system. State funding for heritage is very limited and available only for protected monuments. EU funding can be directed towards e.g. regeneration projects that could include adaptive reuse, but there is no particular steer to favour reuse or heritage. There is much focus on tourism potential when it comes to the reuse of heritage, and particularly in this context, heritage is talked about as an (economic) resource, due to the available funding and the expected profit. Some other programmes specifically focus e.g. on churches, or rural areas, and these can provide funding for locally listed or non-listed buildings. Tax reductions and other incentives, low interest loans apply only to protected monuments.

### Stakeholder Integration

Heritage is used as a tool (in terms of identity or economic development) of national government. Community initiatives, civic organizations are generally discouraged by government. There are many civic organisations, but little encouragement for people to get involved in heritage management, little funding, and institutional and legal structures are difficult to navigate. Civic and private actors encounter a complicated legal and institutional system, and no active expert support, while certain developments enjoy exceptions.

## Italy

### Adaptive Reuse

In Italy, adaptive reuse is connected to aims of solving vacancy. However, it often seems to happen despite the (heritage) system and seems more supported by other policies (e.g. tourism, social, cultural, economic and urban regeneration policies) than by heritage policies. Conservation is often seen as a barrier for adaptive reuse.

### Policy integration

Italy has a federal plan-based planning system. It requires urban (master / zoning) plans and policies on regional, sub-regional, and local level, leading to complexity and contradictions. Land-use is set on sub-regional level. Heritage is regulated through the national heritage agency and its devolved regional offices. This increases the complexity, as decisions being made in/on separate levels and offices. Regional landscape plans are supposed to be the tool for integrating heritage in the (local) urban plans. Lack of institutional capacity means this is often not fully implemented. The regulations around heritage are complex and rather strict, also influenced by restrictions through planning and landscape regulations. The heritage system nationally is inflexible, but in some situations it has become interpreted in a more flexible manner due to circumstances e.g. lack of funding due to austerity, or the introduction of new urban management, such as urban commons regulation and management.

### Resource Integration

The national urban policy is programme led, and often follows EU programmes and funding, e.g. urban regeneration in the urban outskirts and deprived areas, which stimulates reuse, separated from a heritage perspective. Urban regeneration and economic development are the primary frameworks for adaptive reuse in various national, regional, and local policies and financing schemes. There are government grants and low interest loans for heritage. However, due to lack of integration, these often are not aligned with other special programmes e.g. on youth, tourism, and urban regeneration which provide funding for adaptive reuse outside of 'heritage' structures. Some other funding is available via "Art bonus" (a tax incentive for those supporting culture and cultural heritage), and incentivising PPP(P), the transfer of asset ownership. Many adaptive reuse projects are also community or self-funded with time and local / personal resources. The complexity and contradictions, in combination with a lack of institutional capacity means the system is not so well resourced when it comes to e.g. support, knowledge sharing, and speedy decisions on grants and permits.

### Stakeholder integration

Heritage in Italy has a strong history of public support and private involvement, and civic participation is encouraged in the management of public goods at every governance level. The concepts of "public use" and "social value" of cultural heritage are important in the Italian Code for cultural assets and landscape, but they are not always 'lived up to' in reality. Via social enterprises and associations/cooperatives many local groups are organised in the sector. Reduced capacity and austerity in local government has led to an increase in local community initiatives engaging e.g. in mapping vacant buildings, organising events, (il)legal temporary reuse etc. PPP(P) is also encouraged to foster adaptive reuse. There are national government calls to improve the connection between civic engagement and heritage. There is also an increase in the 'commons' movement. A lack of sectoral coordination / weak institutional capacity stimulates active civic involvement, but also leads to a case by case approach which tends to limit wider knowledge sharing and learning.

## Netherlands

### Adaptive reuse

Adaptive reuse (herbestemming) is actively stimulated by the government (through planning, culture, design, and heritage agencies), in terms of resources, sharing knowledge, supporting pilots, and it is encouraged in policy. It is seen as a useful means in regeneration, developing regional and local identity, as well as solving vacancy.

### Policy integration

The planning system is based on the principle of subsidiarity, and it is comprehensively regulated. Goals for planning are set out at national scale, local plans are harmonized by regional plans developed by the provinces. Built heritage (broadly) is well integrated in the Dutch planning system and will be even further integrated (legally) in the upcoming 'environment and planning act'. Currently there is a land-use plan on local level, that integrates a heritage 'layer' and stimulates an area-based integrated approach. Municipalities are powerful and well-resourced. Most decisions on both heritage and planning are taken on local level, and whilst planning and heritage the systems are tightly regulated, on local level there is space for negotiation, creating flexibility to accommodate for adaptive reuse. The main approach to heritage is conservation through development and fostering socio-economic development through capitalizing cultural-historical values (developing more explicitly since the 1999 Belvedere policy). All levels of government also actively engage in undertaking and supporting adaptive reuse projects. There was a national expert team operating between 2015 and 2019 that identified issues in building regulations to propose changes to make them align better with adaptive reuse.

### Resource integration

Financially as well as in terms of other resources (funding, support, knowledge, research, pilots, policy) the system is well resourced and supportive. All levels of government have a strong interest in stimulating adaptive reuse. Public authorities on all levels offer free access to in-house knowledge and time of their experts, both through specific programmes (e.g. energy sustainability), and heritage / planning departments. The National Restoration Fund Trust is a revolving fund providing low interest loans, and offer bespoke project and finance advice for reuse projects. In the context of heritage, reuse is also being 'financed' through using the heritage value as a branding and marketing tool. Many reuse projects are being made attractive through providing low rent and longer lease options, rent & facilities 'package deals', shared facilities, so they attract a particular audience. There are different fiscal measures e.g. deduction of maintenance costs from income or corporate tax. The National Heritage Agency (RCE) offers annual rounds of grants for undertaking viability research and grants for 'wind and watertight / urgent works' to contain deterioration.

### Stakeholder integration

There is an increased focus on participation and engagement in policies when it comes to planning and heritage, e.g. under the term 'do-democracy'. However, in many ways the system is still very expert led. A new comprehensive environment and planning act (expected in 2021) has obligatory participatory elements, which are currently being piloted. The heritage agency has also started a programme to implement the Faro Convention.

## Poland

### Adaptive reuse

Poland has no specific regulations, or other legal basis addressing adaptive heritage re-use. Use is considered within the significance of the heritage asset. A post-crisis Act on the Revitalization of degraded areas (2015) can help in allowing more flexible developments, including adaptive reuse, but generally the heritage system is inflexible.

### Policy integration

Poland is unitary state, but it has devolved offices on the self-government level (three-tier) independent of national level. Spatial planning responsibilities lie on municipal, voivodeship, and national levels. Local government follows the rules of the European Charter of Local Self Government, and responsibilities and decisions are made on the lowest level of government. The Polish heritage system is rather inflexible and focuses on the material preservation. Decisions on the protection of monuments are made at the level of the voivodeships via devolved national government offices, and conservation is also supervised from that level. The change of use of a protected monument should be aligned with its heritage values and has to be approved by the relevant conservation officer. A major issue is poor enforcement, even if regulations are strict, combined with a strong economic pressure, uncontrolled change can happen. Developers also turn this gap into a benefit through their effective local power (lobby), often at the expense of built heritage. In general, the Polish heritage and planning systems seem to operate rather separately, and decisions are made on separate government levels. Only where the re-use of built heritage is regulated by the planning documents, some integration on local level happens. They also come together on local level through the Revitalisation Act, but in case of formal heritage the regional officer needs to be involved.

### Resource Integration

In terms of the potential of built heritage as a resource, there is a strong focus on the economic side, primarily in tourism, as well as on the role of heritage in increasing (local) identity. Owners are obliged to finance the conservation of even the listed monuments (60% owned by the state or church). Partial funding is available for the restoration of listed monuments at national and at local level based on application, but it can finance only the conservation of the historical structure, while it cannot be used on any kind of modernization or reuse. There are also targeted funds available for specific types of monuments as well as some limited tax incentives.

### Stakeholder Integration

In general, public consultations are included in the planning process, but urban revitalization projects regulated by the Revitalisation Act represent a special and positive case in terms of civic involvement. Public participation is required in the preparation phase, management of the process and final evaluation of results, and there are also some professional bodies to consult. Citizens are encouraged by municipalities in various ways to participate in decision making processes although it often happens only because of formal obligation. In many municipalities there is a separate budget for this. Participatory budgets in some type of municipalities are obligatory by law. Municipalities can also assign experts to facilitate these processes.

## Portugal

### Adaptive reuse

Despite not being directly focused on adaptive reuse, current Portuguese public planning and legal documents are mainly based on regeneration/rehabilitation principles. The Rehabilitation of Urban Areas law (2009, renewed in 2019) and subsequent policy programs (post-crisis) are crucial in a cultural shift towards embracing adaptive reuse of built heritage.

### Policy integration

Planning programmes are set at national and regional levels, while local plans at local level regulate specific land use; regional programs and local plan must be consistent with the national spatial planning policies. They also support municipalities responsible for land-use and planning. State, autonomous regions and local authorities have joint competence in the matter of cultural heritage protection, although local authorities are the main responsible for restoration and protection of listed assets. Local authority also has some discretion as they set a lot of the planning / tax policy and list the local heritage. Also, temporary protection of zones can be declared by municipalities. Area-based protection exists as well as that of the environment of monuments. Depending on the 'grade' of heritage it is dealt with by regional offices (devolved from national heritage DG) or local authority, and heritage is to be integrated in the municipal urban plan.

For long, there was poor harmonization between different legislations. Combined with strong austerity measures, this led to disorganized territory, uncontrolled planning, and a complex system, which is fairly rigid especially for heritage. The new Act on the Rehabilitation of Urban Areas introduces a more integrated approach and flexibility in urban regeneration interventions (when partly for residential use) by introducing the idea of proportional and progressive improvements, and working towards a system that is better prepared for reuse (rather than just for new built) and more flexible / proportional. The new Act also integrates heritage and reuse, and it addresses historic zones and deprived areas by integrating their regeneration with different other policies i.e. urban, social, transport and conservation.

### Resource Integration

At the moment, adaptive reuse is founded mainly through tourism and urban regeneration programmes (encouraged by EU funding). There is a limited budget for heritage and cultural programmes (state funding), in the form of national funds to support renovation, conservation and restoring projects of cultural assets of national and public interests. There is a tax regime (incentive / reliefs) for urban renovation, which can be specified locally. There are also some municipality-level funding programs.

### Stakeholder Integration

Citizens' participation is among the main principles of the planning and heritage law, and the planning and heritage system include consultation processes. Real participatory practices (rather than consultation) are possible, such as the programme in Lisbon (BIP/ZIP), but not common.

## Romania

### Adaptive reuse

In terms of adaptive re-use of heritage, there are no specific frameworks or policies in place in Romania. The change of use for protected monuments is seen as an intervention that needs approval by the ministry. Most financing possibilities are catered towards preservation rather than adaptation of heritage.

### Policy integration

The EU integration of Romania had a crucial impact on the shaping of its planning system. Territorial development plans and sustainable development strategies form the base for regional development, including areas of historic significance. The national strategy created in the process of EU integration suggests an integrated approach to cultural heritage, as a key aspect of sustainable development, but lacks a clear implementation framework. It is a multilevel planning system, where plans at every level should be adjusted to the ones above, from the level of settlement zones within municipalities through counties and regions to the national spatial plan. In contrast, heritage protection is very much centralised, and the national directorate operates through regional offices. Planning and heritage meet only at the local level: local plans integrate land use, protected zones, and historical areas, and specify the technical and legal context for development. Still, interventions to all historic monuments must be approved at the national level, though the use is normally suggested at local level since the function is seen as separate from the heritage character.

### Resource Integration

The most common source of finance for historic buildings is from central government and local public administrations. This includes heritage funds as well as European developmental funds but without explicit steer in those funds to focus on reuse. EU funds channelled into specific urban / rural development projects, and programmes (e.g. tourism strategy, sustainable development) often capitalise on heritage. Still, several crucial areas in heritage remain unfinanced, such as rural heritage, minority heritage. Private investments and sponsorship in cultural heritage is not particularly encouraged, and public-private partnerships are also scarce. Existing tax incentives are not efficient. From a heritage perspective, there is a lack of experts; financial and human resources to both implement the legislation and enforce it, are scarce.

### Stakeholder Integration

The system is very much expert-based and centralized. Monuments of local significance are also designated and listed in a centralised manner by the state, mostly independently from the views and perspectives of local communities. In general participation is not easy, and whilst there are various bottom-up participatory processes in some places, they very much depend on local action and the openness of local authorities to this, as well as on getting some support from NGOs with experience to navigate the system. NGOs have an important role in mitigating the effect of the overcentralized heritage system and the lack of experts. They help lobby minority heritage and guide restoration and reuse processes. Many of these operate on volunteer base. Public-private-people partnerships are not encouraged, though their necessity is recognized. Strong links between local governments and developers can also undermine the enforcement of the regulations.

## **Slovakia**

### **Adaptive reuse**

In Slovakia, the idea of adaptive reuse as the best way of preservation is gradually becoming dominant. Heritage protection in Slovakia is focused on preservation, though the potential of heritage as an economic resource is increasingly recognized. The aim is to make heritage a backbone of the local economy development, especially through tourism and service economy. Therefore, there is increasing flexibility in heritage protection, and exemptions are made under the pressure of market forces.

### **Policy integration**

Planning and heritage are legislated under the same act, but they are the responsibility of different levels of government. The legal framework, administration, and financial policy of cultural heritage protection is centralised at the national level, at the ministry of culture, with devolved regional boards, and implemented by local authorities. Planning and land use issues are dealt with by the special departments of spatial planning in the regional councils, and in planning documents at local level.

### **Resource Integration**

Heritage preservation is implemented by local authorities who are structurally underfunded and generally have no professional capacities to help effectively in the revitalization projects. There is some state support (subsidies and low interest loans) available for owners to renovate their properties (currently only residential housing stock is targeted by the national program, and public buildings are targeted by some local programs), and the national program "Let's Renovate Our House" for the owners of cultural properties, but with focus on renovation and not reuse. However, the system generally lacks financial and institutional resources. EU funding has been focused on urban regeneration, but without much attention for community building and heritage. Programmes supporting industrial production or cultural and creative industries could also be a great opportunity for heritage reuse, but the latter is not in the explicit target. Procurement is also a barrier, with focus on lowest price criteria. There is also a lack of skilled workforce for heritage management.

### **Stakeholder Integration**

There is a growing interest of public authorities in collaborating with civic initiatives. The legal framework is getting more supportive in this respect, and the institutional capacities are being improved. Still, there are some ambiguities in the regulation of the operation of NGOs, and they have no common registry. NGOs are also prohibited by the law from engaging in functions provided by the public administration, though no heritage related activity is addressed specifically in the legislation.

## Spain

### Adaptive reuse

The pre-crisis emphasis on "private urbanism" with speculative ambition was often destroying built heritage; this has changed with the demise of new construction activities in the post-crisis decade. Subsequently, there seems to be a general positive attitude, and legal / policy framework that have started to stimulate adaptive reuse to turn it into a common practice.

### Policy Integration

Spain is a (quasi) federal state with 4 tiers of government. The main planning strategies are created at national level, although autonomous communities (regions) have exclusive competences in planning. There is a national Historical Heritage Act (1985), but all regions also have their own cultural heritage law, and strong regional identities. Decision making around adaptive reuse within planning and heritage are dealt with mainly on local level. The difference in levels of legislation leads to a fragmented framework, with significant regional differences in inventorying, managing, and funding heritage and adaptive reuse, as well as levels of integration of planning and heritage. However, further legal and policy integration as well as stronger links between concepts of conservation and regeneration are asked for.

Heritage is seen as tool for urban regeneration, especially after the crisis, the focus shifted from new construction to reuse and regeneration (post-crisis legislation and policy). This is not specifically focussed on heritage but more supportive of dealing with existing assets. There are various integrating initiatives: e.g. the ministry for development has a policy programme on restoration of architectural heritage, focussed on employment and sustainability, and stimulating regional economies and tourist industries. Adaptive reuse projects at local level often suffer political support, and there are no clear policies on temporary use / change of use. The Building regulations are changing and acknowledge the need for flexibility and proportionality in relation to reuse projects.

### Resource Integration

Heritage is seen as a resource for cultural, social and economic gain. There is specific governmental funding for heritage (structural support as well as project grants), as well as tax reductions as incentives. For adaptive reuse, there are also resources, mainly through government funding and EU programmes (e.g. ERDF, URBACT). The latter have directed the focus on developing the tourism economy and urban regeneration. Procurement is an obstacle, as the criteria often do not support reuse (e.g. focus on lowest price, not sustainability or quality of life).

### Stakeholder integration

There is a policy programme encouraging civic engagement in heritage, supporting various activities and community building. There are some cases where forms of local experimentation incentives for PPPs are experimented with, e.g. Barcelona explored (decidim Barcelona) which is a (partly digital) collaboration between public, private and community sectors. There is a growing trend nation-wide towards encouraging civic engagement, inclusive construction (including adaptive reuse) and developing alternative models for this, supported, and piloted through various bottom up projects, initiatives and networks. However, community led projects are not common, and the regulatory system does not (yet) facilitate legal tools that can stimulate them (e.g. DYI/ or temporary use).



## Sweden

### Adaptive reuse

Reuse is common practice, but not specifically promoted or stimulated through policies. There is a trend at the local level towards rendering more flexible changes in the future use of historical buildings. In large cities such as Stockholm or Gothenburg, adaptive reuse already has a long tradition in urban development.

### Policy integration

Different forms of heritage protection status allow for different degrees of adaptive reuse but also different incentives. Main heritage protection provisions are legislated at national or municipal levels, sometimes creating conflicts between national and municipal interests of development and protection. For the most part, the public authorities, however, are well coordinated and forms of mitigation exist. Most decisions on change of use, appearance, and cultural historical value, are taken on local level, are regulated through a local 'detailed plan' and there is space for discretion on local level. Recent federal policy efforts ("Gestaltad livsmiljö") have been made to integrate heritage protection with other urban policy fields (finance, environmental, housing and planning) around the notions of quality of life and living environment.

### Resource Integration

Compared with most other countries considered, Sweden has relatively well funded and well-coordinated public institutions related to heritage, building permits etc., and funds civic actors to cover additional costs related to the preservation of protected heritage objects. They also support them to navigate the system and to arrive at solutions that balance the requirements of economic development and preservation.

Reuse is seen as profitable in certain sectors (especially housing and offices) for private developers due to the value and attractiveness of heritage. The national heritage body offers subsidies for maintenance to owners (individuals, private, public, and church), but there are no further tax reliefs. There is little funding or resources specific for adaptive reuse, and quite a complex system of funding that could be used. However, that also means there are various funding programmes with no specific reuse objectives that can be and are used for reuse (e.g. energy efficiency, arts and culture, social services).

### Stakeholder Integration

Sweden counts on an active civil society and, in particular, on the Swedish Local Heritage Foundation with a large membership of 500,000 persons that is concerned with heritage, particularly at a local level. Its relationship to public authorities is reported to be collaborative. Recent changes in the planning provisions of the Environmental Code are criticized for favouring large developers with legal expertise to realize their development interests, if needed through the lawsuits.

## Ukraine

### Adaptive reuse

In Ukraine, there has been little interest in, or support for, adaptive reuse by the government. There are only a few – local – initiatives that build on the touristic potential of heritage, and some 'one-off' big-scale adaptive reuse projects led by central government in the capital Kyiv. Heritage regulations stress the preservation of authenticity, and the use of heritage and its adaptation is perceived as a potential threat as change is defined negatively. Adaptive reuse projects led by civic organisations and businesses happen 'despite' the system.

### Policy integration

Ukraine has four levels of government. Formally regional and district administrations are responsible for heritage protection, whereas the responsibility on the national level is split between the Ministry of Culture and Ministry for Territories and Regional Development. In practice, many regions have no specialized departments for heritage protection at all, just some administrators in the government. Offices of heritage protection attached to the city councils exist only in cities with considerable number of listed monuments. When they exist, they do not report to the Ministry of Culture; a structured vertical integration of heritage protection is missing. Horizontal integration between planning and heritage is also lacking; only some local authorities are proactive in this respect. The heritage approach is very much expert-lead and object-centred. Laws are outdated and the system is difficult to navigate, incoherent due to several gaps, the lack of funding, and lack of integration. Bureaucracy is complicated despite some recent attempts to simplify and decentralize it, and corruption is a major problem. Other issues are uncontrolled development and a lack of capacity for enforcement. Recent legislation even favours the developers at the expense of heritage, and developers often disregard the building regulations anyway.

### Resource Integration

The support for culture and heritage from the state budget is limited, though in the last years a national grants program for culture and cultural industries has opened some possibilities. Some financial support for heritage-related and cultural projects comes from abroad, otherwise most of the funding is private investment. There are no tax incentives to encourage investment in heritage revitalization, only fines. Property rights are not strongly protected, which creates insecurity and risk for investors. The organizational system suffers from the lack of capacity, in particular specialists to develop and enforce the regulations and it is virtually impossible to monitor or properly document monuments. Local authorities, if at all, prioritize heritage reuse primarily in the context of tourism, and these projects tend to be business-led and profit-oriented.

### Stakeholder Integration

Heritage protection in Ukraine is dominated by the professionals and an expert discourse, whereas heritage reuse is advocated by NGOs and businesses. Citizens act as voluntary inspectors of monuments assisting public institutions and take part in public hearings, but this system is not effective. There is little attention to the heritage community and the social relevance of heritage in government. Interestingly, after 2014 (Ukrainian Revolution) civil society became much more active, and adaptive reuse became the fashion among the activists, especially with international support. Policies and projects to promote participative processes are emerging on the local level.

# Annex 1 Scoring of countries

	Inflexible 1 - Flexible 4				Difficult to navigate/ fragmented 1 - Easy to navigate/Integrated 4				Civic discouraging 1 - encouraging 4				Not-resourced 1 - well resourced 4				total AV	AV AV
	Researcher 1	Researcher 2	Researcher 3	AV	Researcher 1	Researcher 2	Researcher 3	AV	Researcher 1	Researcher 2	Researcher 3	AV	Researcher 1	Researcher 2	Researcher 3	AV		
Austria	3.0	3.0	3.0	3.0	2.0	3.0	2.0	2.3	2.0	3.0	2.0	2.3	4.0	4.0	4.0	4.0	11.7	2.9
England	4.0	4.0	4.0	4.0	3.0	4.0	3.0	3.3	3.0	4.0	4.0	3.7	4.0	4.0	3.0	3.7	14.7	3.7
Flanders	2.0	2.0	2.0	2.0	2.0	2.0	1.0	1.7	2.0	3.0	3.0	2.7	3.0	3.0	3.0	3.0	9.3	2.3
France	1.0	2.0	1.0	1.3	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	3.0	3.0	4.0	3.3	8.7	2.2
Germany	2.0	3.0	2.0	2.3	2.0	3.0	3.0	2.7	3.0	3.0	3.0	3.0	3.0	4.0	3.0	3.3	11.3	2.8
Hungary	1.0	2.0	1.0	1.3	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	1.0	1.3	4.7	1.2
Italy	2.0	2.0	3.0	2.3	2.0	2.0	3.0	2.3	3.0	3.0	4.0	3.3	2.0	3.0	3.0	2.7	10.7	2.7
Netherlands	4.0	3.0	4.0	3.7	4.0	4.0	4.0	4.0	4.0	3.0	4.0	3.7	4.0	4.0	4.0	4.0	15.3	3.8
Poland	2.0	2.0	2.0	2.0	3.0	3.0	3.0	3.0	4.0	3.0	3.0	3.3	2.0	2.0	2.0	2.0	10.3	2.6
Portugal	3.0	3.0	3.0	3.0	3.0	3.0	2.0	2.7	3.0	3.0	3.0	3.0	3.0	3.0	2.0	2.7	11.3	2.8
Romania	1.0	2.0	2.0	1.7	1.0	2.0	2.0	1.7	2.0	2.0	1.0	1.7	2.0	1.0	1.0	1.3	6.3	1.6
Slovakia	3.0	2.0	3.0	2.7	3.0	2.0	2.0	2.3	2.0	2.0	3.0	2.3	1.0	2.0	1.0	1.3	8.7	2.2
Spain	3.0	3.0	2.0	2.7	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	2.0	2.7	11.3	2.8
Sweden	4.0	4.0	3.0	3.7	3.0	4.0	4.0	3.7	3.0	4.0	4.0	3.7	3.0	3.0	4.0	3.3	14.3	3.6
Ukraine	2.0	1.0	2.0	1.7	1.0	2.0	1.0	1.3	1.0	2.0	1.0	1.3	1.0	1.0	1.0	1.0	5.3	1.3

## Annex 2 Arithmetic analysis of countries

### Separation into equal intervals:

When separating the difference of 2.6 points between Hungary and Netherlands into two equal intervals of each 1.3 (first interval 1.2 – 2.5; second interval 2.51 – 3.8); the following groups result:

- First Interval: Hungary, Ukraine, Romania, France, Slovakia, Belgium
- Second Interval: Poland, Italy, Germany, Portugal, Spain, Austria, Sweden, England, Netherlands

When separating the difference of 2.6 points between Hungary and Netherlands into three equal intervals of each 0.86 (first interval 1.2 – 2.06; second interval 2.07 – 2.93; third interval; 2.94 – 3.8); the following groups result:

- First Interval: Hungary, Ukraine, Romania
- Second Interval: France, Slovakia, Belgium, Poland, Italy, Germany, Portugal, Spain, Austria
- Third Interval: Sweden, England, Netherlands

When separating the difference of 2.6 points between Hungary and Netherlands into four equal intervals of each 0.65 (first interval 1.2 – 1.85; second interval 1.86 – 2.5; third interval; 2.51 – 3.15; fourth interval 3.16-3.8); the following groups result:

- First Interval: Hungary, Ukraine, Romania
- Second Interval: France, Slovakia, Belgium, Poland, Italy, Germany, Portugal, Spain, Austria
- Third Interval: Poland, Italy, Germany, Portugal, Spain, Austria
- Fourth Interval: Sweden, England, Netherlands

When separating the difference of 2.6 points into five equal intervals of each 0.52 (first interval 1.2 – 1.72; second interval 1.73 – 2.24; third interval; 2.25 – 2.76; fourth interval 2.77-3.28; fifth interval 3.29-3.8); the following groups result:

- First Interval: Hungary, Ukraine, Romania
- Second Interval: France, Slovakia
- Third Interval: Belgium, Poland, Italy
- Fourth Interval: Germany, Portugal, Spain, Austria
- Fourth Interval: Sweden, England, Netherlands

### Largest differences among countries in sequence:

The largest difference in the sequence ordered by score from one country to the next is 0.7 between Austria (2.9) and Sweden (3.6). The second biggest is 0.5 between Romania (1.6) and France (2.1). The third largest difference is 0.3 between Ukraine (1.3) and Romania (1.6) as well as Flanders (2.3) and Poland (2.6).

If groups are organized by the largest difference, two groups result:

- First group: Hungary, Ukraine, Romania, France, Slovakia, Belgium, Poland, Italy, Germany, Portugal, Spain, Austria
- Second group: Sweden, Netherlands, England

If groups are organized by the two largest differences, three groups result:

- First group: Hungary, Ukraine, Romania
- Second group: France, Slovakia, Belgium, Poland, Italy, Germany, Portugal, Spain, Austria
- Third group: Sweden, England, Netherlands

If groups are organized by the three largest differences, five groups result:

- First group: Hungary, Ukraine
- Second group: Romania
- Third group: France, Slovakia, Belgium
- Fourth group: Poland, Italy, Germany, Portugal, Spain, Austria
- Fifth group: Sweden, England, Netherlands