

This paper will provide a critical commentary on a peer-reviewed article written by Kate Clark (2014), *Values-Based Heritage Management and the Heritage Lottery Fund in the UK*, which considers the influence of the Burra Charter in assessing and managing cultural heritage and heritage practice in the UK. Clark reflects on the notion of significance in her assessment of the policies and positions that frame decision making in a contemporary heritage context focusing on the work of the English Heritage, the Heritage Lottery Fund and the National Trust's *Spirit of Place* agenda. Recognition is given to community values and the challenges these values might provide to established heritage stewardships, but there is less consideration of wider challenges to the assumptions and privileges of stewardship. However, it is possible to identify three key themes within Clark's article that I would like to comment on: subjectivity, significance and authenticity. My aim in this commentary is to critique the subjectivity of values-based heritage management, which emerges unscathed from Clark's article, and to challenge her assumptions of what Poullos (2010, p.172) refers to as the 'most preferred approach'.

Clark's position rests on an implicit acceptance of values-based heritage management's subjectivity, top down and commercial approach from established stewardships making decisions on behalf of various communities (Clark, 2014). Heritage management decisions based on income generation, and the strengths and weaknesses of that approach, need to be challenged. However, there are issues here which Clark appears to avoid addressing. A more community driven, bottom up approach may have greater long-term value; it can create stronger and more sustainable bonds with the community; and it can create more stability than a commercially driven market for heritage-tourism (Friends of the Newport Ship, 2017; Granby Four Streets, 2018).

Clark explains her involvement with values-based heritage management and claims peer ownership of the shift from an individual decision-based process to the more apparently open and measurable process of analysis and diagnosis, which provides the foundation of values-based heritage management. Clark's language here leads towards notions of treatment and cure, hinting at a potential transformation of a poorly asset to a 'cured'/polished up, economically viable one (Clark, 2014, pp.65-66). Whilst recognising that partiality within an individual decision-based process is an issue, Clark does not appear to question the subjectivity and biases within the values-based process of analysing sites and diagnosing whether they are 'heritage-worthy' (Clark, 2014, pp.65-66; Natural England, 2008, p.9; Marti, 2012, p.276). Clark appears to seat herself alongside the view of UNESCO (2012, p.6) in assessing the value of a site in terms of its exhibition potential.

The potential subjectivity involved in a decision to shift the function of a site from an archaeological to an exhibition emphasis, may result in a loss of authenticity (Natural England, 2008, p.9; Nguyen & Cheung, 2016, p.999). Although this key area of contemporary debate within heritage (Wang, et al., 2015, pp.1469-1471) is overlooked by Clark, she does discuss a methodology based on significance. This ranges from a recognition of Jim Kerr's seminal influence on the Burra Charter; an account of the Burra Charter's translation to a UK context and practice; and a brief description of heritage values and the institutions that manage them (Clark, 2014, pp.65-66).

Clark states that significance provides the basis of values-based heritage management (Clark, 2014, pp.65-66). But what is the definition of significance? Who determines what is significant? And why are these decisions in the hands of potentially privileged stewardships? Despite acknowledging conflicts of interest between those with a commercial interest in a site and the site's archaeological guardians (Clark, 2014, pp.66-67), it might have been useful to have had further discussions on the notion of significance (Byrne, 2008, pp.160-163). Clark's investment in values-based heritage management may be responsible for her lack of interrogation of the processes that she was instrumental in developing. She does however acknowledge that there are gaps in this approach and identifies that more needs to be done to articulate the contemporary ethos and desire for preserving cultural heritage (Clark, 2014, pp.65-70). Poullos' (2010) work on living heritage and Buckley & Sullivan's (2014) work on indigenous cultural heritage provides a critical discussion that is useful in filling in gaps within Clark's own approach. Jameson (2008, p.430) also challenges the restrictions within the defined values and acknowledges more inclusive ideas of authenticity.

Authenticity could be gained from giving greater priority to community values and lesser priority to the commercial motives of stewardships. This could encourage more inclusiveness in community access to heritage decision-making processes and a greater sense of community ownership of sites (Fallon & Kriwoken, 2003, pp.291-292). Walter (2017, pp.50-52) points out that there are issues with the methodology of values-based heritage which can create a distance between communities and their heritage. Local people are not necessarily included in a stewardship's assessment process and may be denied access to decision-making. Clark (2014, p.68) comments on the differences in the values assessed in the protection of heritage and those that that need to be considered in its management. She cites the example of Altab Ali Park in South London, where a medieval church was once situated, which is named after and commemorates Altab Ali and the victims of other racist murders. The local Indian community requested that their park be considered significant and therefore protected under the *Register of Parks and Gardens*, but their request was rebuffed on the grounds of the site only being of 'local value'. Despite her interest, Clark does not take a position on whether this decision was appropriate, or seem willing to counter the national/international values-based management of heritage with a community values-based approach.

The development of values-based heritage management in the 1980's ties in with the emergence of neo-liberal economics and political culture in the UK. Apaydin highlights this influence as dependent on valuing sites in terms of profit motives (Poulios, 2010, p.172; Core, 2016, p.370). Therefore, it might have been useful for Clark to have reflected some development of value for money notions, as she has previously, and engaged in a more detailed debate about why heritage may or may not require funding, and what relevance, or value, heritage has within society (Clark, 2014; Clark, 2004).

Clark's approach is discursive and tends towards reflection rather than analysis, leading to a sense that there is a generalised and sometimes unfocused mass of personalised information. Her consideration of such a broad area is in danger of identifying no clear questions and therefore no definitive conclusions (Clark, 2014), unlike the clarity that is evident in her previous work on this subject (Clark, 2004; Clark, 2010).

Bibliography

- Buckley, K. & Sullivan, S. (2014) 'Issues in Values-Based Management for Indigenous Cultural Heritage in Australia', *APT Bulletin: The Journal of Preservation Technology*, 45(4), pp. 35-42.
- Byrne, D. (2008) 'Heritage as Social Action', in: Fairclough, G., Harrison, R., Jameson, J., Schofield, J. (eds.) *The Heritage Reader*. Oxon: Routledge, pp. 147-173.
- Clark, K. (2004) 'Why Fund Heritage? The Role of Research in the Heritage Lottery Fund', *Cultural Trends*, 13(4), pp. 65–85.
- Clark, K. (2010) 'Informed Conservation: The Place of Research and Documentation in Preservation', *APT Bulletin: The Journal of Preservation Technology*, 41(4), pp. 5-10.
- Clark, K. (2014) 'Values-Based Heritage Management and the Heritage Lottery Fund in the UK', *APT Bulletin: The Journal of Preservation Technology*, 45(2/3), pp. 65-71.
- Core, 2016. *Economic Rights, Heritage Sites and Communities: Sustainability and Protection*. [pdf] Available at: <https://core.ac.uk/download/pdf/81230337.pdf> (Accessed 5 November 2018).
- Fallon, L. & Kriwoken, L. (2003) 'Community involvement in tourism infrastructure—the case of the Strahan Visitor Centre, Tasmania', *Tourism Management*, 24(3), pp. 289–308.
- Friends of the Newport Ship (2017) *Finding the Ship*. Available at: <https://www.newportship.org/archaeology-conservation/finding-the-ship> (Accessed 1 November 2018).
- Granby Four Streets (2018) *History of Granby Four Streets*. Available at: <https://www.granby4streetsclt.co.uk/history-of-the-four-streets/> (Accessed 1 November 2018).
- Jameson, J. (2008) 'Presenting Archaeology to the Public', in: Fairclough, G., Harrison, R., Jameson, J., Schofield, J. (eds) *The Heritage Reader*. Oxon: Routledge, pp. 427-456.
- Marti, A. (2012) 'Excavation, Exhibition, Conservation or Reservation: Technical Criteria for a Decision-Making Process', in: Sullivan, S., Mackay, R. (eds.) *Archaeological Sites: Conservation and Management*. California: Getty Publications, pp. 271-279.

Natural England, 2008. *Natural England: Preparing a heritage management plan*. [pdf] Available at: <https://www.gov.uk/government/publications/heritage-management-plans-guides-for-conditional-exemption> (Accessed 29 October 2018).

Nguyen, T. & Cheung, C. (2016) 'Toward An Understanding Of Tourists' Authentic Heritage Experiences: Evidence From Hong Kong', *Journal of Travel & Tourism Marketing*, 33(7), pp. 999–1010.

Poulios, I. (2010) 'Moving Beyond a Values-Based Approach to Heritage Conservation', *Conservation and Management of Archaeological Sites*, 12(2), pp. 170-185.

UNESCO, 2012. *Unit 6: Significance Assessment*. [pdf] Available at: <http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/CLT/images/630X300/UNIT6.pdf> (Accessed 29 October 2018).

Walter, N. (2017) 'Everyone loves a good story: Narrative, tradition and public participation in conservation', in: Chitty, G. (ed.) *Heritage, Conservation and Communities: Engagement, Participation and Capacity Building*. Oxon: Routledge, pp. 50-64.

Wang, Y., Huang, S. & Kim, A. (2018) 'Toward a framework integrating authenticity and integrity in heritage tourism', *Journal of Sustainable Tourism*, 23(10), pp. 1468-1481.