

CULTURAL HERITAGE FRAMEWORKS AND GOVERNANCE IN CHINA AND EUROPE: LESSONS FOR ROMANIA

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Abstract: *This article examines the major theoretical frameworks shaping contemporary cultural heritage management (Authorized Heritage Discourse, Values-Based Heritage Management, Sustainable Heritage Management, Cultural Landscape Theory, and Heritage Tourism Theory) and evaluates their applicability across different governance and cultural contexts. Drawing on case studies from Europe and China, it analyzes how political systems, planning traditions, and cultural values influence the interpretation, conservation, and use of heritage. The comparative discussion highlights Europe's shift toward participatory, community-centered governance and China's state-directed model, which selectively incorporates international best practices while maintaining centralized narrative control. The paper then considers implications for Romania, positioned between these paradigms. It argues that Romania's heritage sector would benefit from integrating participatory mechanisms, sustainability principles, and interdisciplinary approaches while adapting international models to local administrative and socio-cultural realities. Overall, the study demonstrates that heritage management must be context-sensitive, balancing expert knowledge, community values, and sustainable development to ensure the long-term vitality of cultural heritage.*

The study of cultural heritage management has evolved through a diverse set of theoretical and conceptual frameworks that structure the ways in which cultural heritage is defined, evaluated, and managed. This paper provides a comprehensive examination of the principal theories informing contemporary heritage-management research, offering a critical evaluation of each framework and its relevance across diverse cultural and political settings. It discusses the Authorized Heritage Discourse (AHD), Values-Based Heritage Management (VBHM), Sustainable Heritage Management, Cultural Landscape Theory, and Heritage Tourism Theory (with particular attention to the tourist gaze and questions of authenticity).

The analysis begins by defining the key concepts (heritage, management, conservation, and values) then moves to an in-depth assessment of each

theoretical model. It concludes with a comparative exploration of how these paradigms operate in Europe and China, supported by concrete case studies such as the Mogao Caves and Bran Castle, which illustrate the practical consequences of applying these approaches.

Cross-cutting debates, including universalism versus relativism in heritage definitions, the relationship between tangible and intangible heritage, and the extent to which Western theoretical models can be transferred to non-Western or authoritarian contexts, are explicitly integrated into the discussion.

Conceptual Clarifications

Before examining the theoretical frameworks, it is essential to clarify the core terms. Heritage studies draw on an interdisciplinary vocabulary, and agreement on definitions underpins the coherence of theoretical discourse. This section defines the notions of cultural heritage, heritage management, conservation, and values as they are used in this chapter.

“Cultural heritage” broadly denotes the legacy of physical artefacts and intangible attributes of a group or society, inherited from the past and transmitted to future generations. It includes both tangible heritage (monuments, buildings, sites, landscapes, objects)¹ and intangible heritage, such as living traditions, practices, knowledge, language, rituals, and other expressions that communities recognize as integral to their identity.²

It is crucial to emphasize that cultural heritage extends beyond officially designated sites; many places and traditions hold profound local or national significance even if they are not recognized by UNESCO. The 1972 UNESCO World Heritage Convention introduced the concept of Outstanding Universal Value (OUV)³, referring to cultural or natural significance “so exceptional as to transcend national boundaries.” This standard reflects a universalist orientation in the assessment of heritage value.

By contrast, frameworks such as UNESCO’s 2003 Convention for the Safeguarding of the Intangible Cultural Heritage⁴ and the Council of Europe’s Faro Convention⁵ foreground a more relativist and community-based perspective: heritage value is defined by the people who create, maintain, and

¹ UNESCO, *Convention Concerning the Protection of the World Cultural and Natural Heritage* (Paris, 1972), chapter I, article 1, <https://whc.unesco.org/archive/convention-en.pdf>.

² UNESCO, *Convention for the Safeguarding of the Intangible Cultural Heritage* (Paris, 2003), article 2, points 1, 2, <https://perma.cc/JP9K-RCBR>.

³ UNESCO, *Convention Concerning the Protection of the World Cultural and Natural Heritage*.

⁴ UNESCO, *Convention for the Safeguarding of the Intangible Cultural Heritage*.

⁵ Council of Europe, *Council of Europe Framework Convention on the Value of Cultural Heritage for Society* (Faro, 2005), Council of Europe Treaty Series (CETS) No. 199, <https://rm.coe.int/1680083746>.

cherish it. From this standpoint, cultural heritage encompasses not only major monuments deemed “universal,” but also everyday cultural practices and places imbued with meaning for specific communities; an understanding that affirms heritage as dynamic, plural, and co-produced through human narratives and memory.

“Heritage management” refers to the processes through which cultural-heritage resources are identified, protected, and administered in the public interest. It is often described both as a process and a product, involving planning and decision-making that balance conservation with contemporary use. One useful definition frames heritage management as the integration of the products and processes that provide society with a wealth of resources created and inherited from the past, shaped in the present, and transmitted for the benefit of future generations.⁶

In practical terms, this entails coordinating technical conservation work, legal protection, stakeholder engagement, and sustainable development, ensuring that heritage sites and practices can endure over time while retaining their significance.

“Conservation,” as defined by the Burra Charter⁷, encompasses “all the processes of caring for a place so as to retain its cultural significance.” It includes a wide spectrum of actions (maintenance, preservation, restoration, reconstruction, and adaptation) intended to safeguard a site’s important values for the future. The focus on cultural significance (often used interchangeably with “heritage values”) highlights that conservation is not an end but a means of sustaining the meanings and values embedded in heritage places.

In this paper, management is understood as a broader undertaking involving policy, governance, and decision-making related to heritage, while conservation refers more specifically to the technical and practical interventions aimed at protecting the material fabric and associated values of cultural heritage.

At the core of contemporary heritage management lies the concept of “heritage values,” the qualities and meanings that justify the preservation of a site or tradition. The Burra Charter defines cultural significance as comprising aesthetic, historic, scientific, social, or spiritual values relevant to past, present, or future generations.⁸

⁶ Ricardo Elia and Marta E. Ostovich, “Heritage Management,” *Oxford Bibliographies Online* (2011), <https://www.oxfordbibliographies.com/display/document/obo-9780195389661/obo-9780195389661-0119.xml>.

⁷ Australia ICOMOS, *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Burwood: Australia ICOMOS, 2013), article 1.4, <https://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf>.

⁸ Australia ICOMOS, *Burra Charter*, article 1.2.

These values may be inherent in the material fabric of heritage (for example, the historic structure of a medieval church) or attributed by people through use, memory, and cultural association (such as the spiritual importance of a sacred place to a community). Heritage values are multivalent and frequently contested. Scholarship emphasizes that values are not fixed attributes of objects but are produced through the interaction of heritage with its social and historical contexts. They evolve over time and often vary among different stakeholder groups.

Commonly identified categories include historic value (connections to the past or to significant events), aesthetic value (artistic or architectural merit), scientific/technical value (knowledge embodied in a site), social value (contemporary meaning for communities and identities), spiritual or religious value, and increasingly, economic value (heritage as an economic asset or tourism resource).

Modern approaches to heritage management advocate recognizing and balancing this full spectrum of values rather than privileging a single dimension (such as historic or artistic significance) at the expense of others. In practice, the field has shifted from an expert-driven focus on narrowly defined “significance” toward a broader, values-based orientation that incorporates multiple stakeholder perspectives into decision-making about the care and use of heritage.⁹

Main Theoretical Frameworks

After clarifying these foundational concepts (what constitutes cultural heritage, what heritage management entails, and how conservation and values are understood) we now turn to the principal theoretical frameworks that have shaped research in heritage management.

Table 1 provides a comparative overview of these frameworks, which will be examined in detail in the following sections.

Theoretical Framework	Focus and principles	Key-concepts and examples
AHD Authorized Heritage Discourse	It emphasizes official, expert-validated narratives about heritage, often oriented toward nation-building and monumental sites. Heritage is understood as material, historical, and “inherently valuable,” with authorized	A top-down, hegemonic discourse that privileges certain values (e.g., monumental aesthetics) while marginalizing others. For example, national registers that prioritize grand monuments tend to

⁹ Randall Mason, “Assessing Values in Conservation Planning: Methodological Issues and Choices,” in *Assessing the Values of Cultural Heritage. Research Report*, ed. M. de la Torre (Los Angeles: The Getty Conservation Institute, 2002), 5-30.

Theoretical Framework	Focus and principles	Key-concepts and examples
	experts (e.g., state heritage authorities) determining what qualifies as heritage.	underrepresent vernacular or minority heritages. Laurajane Smith introduced AHD as a critical analytical concept.
VBHM – Values-Based Heritage Management	It centers on the multiple values that different stakeholders attribute to heritage (historical, social, spiritual, and others) and grounds management decisions in sustaining those values. Developed as a response to the AHD, it promotes a more democratic and pluralistic process.	Assessing significance and engaging stakeholders are central. Its foundations lie in the Burra Charter principle that the purpose of conservation is the safeguarding of cultural significance. For example, heritage-site management plans may involve local communities to identify social values alongside expert assessments of historical and artistic ones. In this view, “managing heritage means managing values.”
Sustainable Heritage Management	It integrates heritage conservation with the goals of sustainable development—social well-being, economic viability, and environmental protection. It recognizes heritage as a resource that must be managed for long-term sustainability and for the benefit of the communities it serves.	A holistic planning approach that balances conservation with contemporary use. Heritage contributes to sustainable development across cultural, economic, social, and environmental dimensions. Examples include the adaptive reuse of historic buildings (preserving cultural value while providing economically viable functions) or limiting visitor numbers to prevent environmental degradation. UNESCO’s Historic Urban Landscape approach (2011)

Theoretical Framework	Focus and principles	Key-concepts and examples
		operationalizes this integration for urban heritage.
Cultural Landscape Theory	It views heritage not as isolated monuments but as landscapes shaped by the interaction between people and their environment. It embraces geographic and anthropological perspectives, blurring the line between nature and culture. Recognized by UNESCO in 1992 through the designation of cultural landscapes.	Human–environment synergy is central. Categories include designed landscapes, organically evolved landscapes (e.g., agricultural terraces), and associative landscapes (sites with spiritual or cultural associations). Examples include the Honghe Rice Terraces (China) as a continuously shaped landscape through indigenous agricultural practices, and the Lake District (UK) as a collaborative product of nature and agrarian culture. The focus is on conserving living cultural ecosystems, not merely individual artifacts.
Heritage Tourism Theory (including „Tourist Gaze” and „Authenticity”)	It examines heritage within the context of tourism, exploring how visitors perceive and experience it (“the tourist gaze”) and their quest for authenticity in travel experiences. It addresses the commercialization of heritage and its interpretation for audiences.	Tourists have a culturally conditioned “gaze”: they seek images and narratives they expect to encounter, often shaped by the media. Heritage sites may “stage” experiences to meet these expectations (staged authenticity – MacCannell). For example, Bran Castle in Romania is promoted as “Dracula’s Castle” to align with popular Gothic legends, despite a tenuous historical

Theoretical Framework	Focus and principles	Key-concepts and examples
		connection. The theory distinguishes between objective authenticity (historical accuracy) and experiential authenticity (the personal meaning experienced by the visitor).

Table 1. (Sources: Clark 2014¹⁰, Smith 2006¹¹; Burra Charter 2013¹²; UNESCO World Heritage Operational Guidelines 2005¹³; Urry 1990¹⁴; MacCannell 1973¹⁵)

Authorized Heritage Discourse (AHD), a term coined by Laurajane Smith¹⁶, describes the dominant Western paradigm of heritage, emerging in the 19th–20th centuries and still shaping contemporary practice. AHD frames heritage as material, monumental, and national, prioritizing major sites—monuments, iconic buildings, artworks, and archaeological sites—deemed historically significant by state authorities or experts. It emphasizes monumentality, aesthetics, age, and scientific authority.

AHD carries implicit narratives of national identity and continuity, positioning heritage as a tool for states to project a shared past and cultural prestige. The discourse is Eurocentric, originating from European experiences and disseminated globally through colonial and international heritage practices¹⁷. Experts (archaeologists, architects, historians, and state officials) hold the primary authority to define and conserve heritage, while community voices and alternative narratives are marginalized.

¹⁰ Kate Clark, “Values-Based Heritage Management and the Heritage Lottery Fund in the UK,” *APT Bulletin: The Journal of Preservation Technology*, no. 45 (2014): 65-71.

¹¹ Laurajane Smith, *Archaeological Theory and the Politics of Cultural Heritage* (London: Routledge, 2004).

¹² Australia ICOMOS, *Burra Charter*.

¹³ UNESCO, *Operational Guidelines for the Implementation of the World Heritage Convention* (Paris: UNESCO World Heritage Centre, 2005), <https://whc.unesco.org/archive/opguide05-en.pdf>.

¹⁴ John Urry, *The Tourist Gaze: Leisure and Travel in Contemporary Societies* (London: Sage Publications, 1990).

¹⁵ Dean MacCannell, “Staged Authenticity: Arrangements of Social Space in Tourist Settings,” *American Journal of Sociology*, 79(3) (1973): 589-603, DOI: <http://dx.doi.org/10.1086/225585>.

¹⁶ Smith, *Archaeological Theory and the Politics of Cultural Heritage*.

¹⁷ Smith, *Archaeological Theory and the Politics of Cultural Heritage*.

In practice, AHD manifests in museum exhibitions, site interpretation panels, and national registers that privilege elite architecture and grand monuments over vernacular or indigenous heritage. As Waterton et al.¹⁸ note, even expert-driven frameworks like the Burra Charter can reinforce an “authorized” version of heritage, limiting unofficial interpretations.

Critiques of AHD emphasize its hegemonic power dynamics. Far from neutral, AHD sustains the authority of states and expert institutions to define heritage, prioritizing material authenticity, monumental sites, and expert values while marginalizing living, community-based, and non-Western heritage. It assumes heritage value is intrinsic and universal, an assumption challenged by scholars advocating a relativist perspective in which value is culturally constructed and context dependent.¹⁹

Recent studies show that AHD is neither monolithic nor immutable. Even official heritage discourses can be negotiated and contested “from below,” incorporating local agency. Case studies (e.g. Ashton²⁰ on Australian heritage) demonstrate that community initiatives and local contexts can reshape narratives framed by AHD. For example, a state-led reconstruction of a private residence in China into a patriotic memorial integrated local traditions and memories, creating a hybrid discourse. Yan’s²¹ comparison of official Chinese heritage narratives, such as Fujian Tulou, with Western AHD highlights notable differences: Chinese discourse emphasizes harmony with nature and living community, contrasting with the Western focus on material structure. Such research underscores the need to critically adapt AHD frameworks in non-Western contexts rather than applying them universally.

A major challenge to AHD emerged with the rise of intangible heritage as an international priority. UNESCO’s recognition of intangible cultural heritage (oral traditions, performing arts, rituals, crafts, etc.) in 2003 directly confronted AHD’s material bias. Intangible heritage does not reside in monuments or objects, but in human practices and knowledge, constantly evolving. This required an expansion of the discursive framework. Smith²² herself argued that intangible heritage challenges the Authorized Heritage Discourse, forcing heritage authorities to shift from conserving static objects to facilitating the

¹⁸ Emma Waterton, Laurajane Smith and Gary Campbell, “The Utility of Discourse Analysis to Heritage Studies: The Burra Charter and Social Inclusion,” *International Journal of Heritage Studies*, no. 12 (2006): 339-355.

¹⁹ Smith, *Archaeological Theory and the Politics of Cultural Heritage*.

²⁰ Paul Ashton, “The Birthplace of Australian Multiculturalism? Retrospective Commemoration, Participatory Memorialisation and Official Heritage,” *International Journal of Heritage Studies*, no. 15 (2009): 381-398.

²¹ Haiming Yan, “World Heritage as Discourse: Knowledge, Discipline and Dissonance in Fujian Tulou Sites,” *International Journal of Heritage Studies*, no. 21 (2015): 65-80.

²² Laurajane Smith, “Intangible Heritage: A challenge to the authorised heritage discourse,” *Revista d’Etnologia de Catalunya*, np. 39 (2014): 13-22.

transmission of living traditions—often owned by source communities rather than the state. AHD, with its emphasis on expert control, struggles to manage heritage that cannot be “frozen” or easily quantified. Integrating intangible heritage has begun to pluralize the discourse on what constitutes heritage, potentially democratizing it by recognizing community knowledge and cultural diversity.

In conclusion, AHD is a fundamental theoretical construct that illuminates how heritage narratives are authorized and by whom. It has been influential in critiquing entrenched heritage practices, particularly universalist, materialist, and expert-driven approaches typical of 20th-century charters and institutions. Understanding AHD provides a reference point against which other paradigms (such as values-based or sustainability-oriented approaches) have developed as responses or alternatives. As the comparative section will show, the relevance and character of AHD can differ between Europe (its site of origin) and China (which has its own state-led heritage narrative), raising important questions about the transferability of Western expert-centered theories to different cultural and political contexts.

Values-Based Heritage Management (VBHM) emerged in the late 20th century as a response to the limitations of Authorized Heritage Discourse (AHD). Unlike AHD, which prioritizes expert judgment, VBHM emphasizes the full range of values identified by diverse stakeholders, operating on the principle that managing heritage is managing values.²³

Its foundations lie in the Burra Charter (ICOMOS Australia, 1979; revised 2013), which introduced the concept of cultural significance and called for conservation decisions to reflect a site’s aesthetic, historic, scientific, and social values for past, present, and future generations.²⁴ This approach marked a shift from earlier materialist-focused philosophies, such as the Venice Charter (1964)²⁵, toward a place-centered, values-based methodology.

In the 1990s, systematic methods for identifying and assessing values were developed by organizations like the Getty Conservation Institute and English Heritage. Frameworks such as *Assessing the Values of Cultural Heritage*²⁶ provided tools to categorize and transparently analyze historic, social, spiritual, aesthetic, and economic values, embedding stakeholder perspectives into conservation planning.

²³ Clark, “Values-Based Heritage Management and the Heritage Lottery Fund in the UK”.

²⁴ Australia ICOMOS, *Burra Charter*.

²⁵ ICOMOS, *International Charter for the Conservation and Restoration of Monuments and Sites* (Venice Charter) (Venice: ICOMOS, 1964), https://civvih.icomos.org/wp-content/uploads/2022/03/Charter-of-Venice_1964.pdf.

²⁶ Marta de la Torre, *Assessing the Values of Cultural Heritage. Research Report* (Los Angeles: The Getty Conservation Institute, 2002).

VBHM emphasizes participatory processes in which stakeholders identify the diverse values associated with a heritage site. Local communities may highlight social or spiritual values; historians might focus on historical significance or rarity; visitors may appreciate aesthetic qualities or the site's atmosphere. These multiple perspectives are systematically integrated into management planning. Kate Clark²⁷ describes this approach as an "intellectual shift" in heritage decision-making, moving from individual expert judgment toward a more transparent, consultative, and evidence-based process. VBHM seeks to democratize heritage management by expanding the circle of those who can articulate significance. It does not dismiss expert knowledge but situates it alongside community knowledge and values derived from practical use.

A defining feature of VBHM is its focus on documenting and assessing values (through significance assessments, value surveys, or participatory workshops) and explicitly linking every management decision to its impact on the identified values. For example, a colonial-era building valued both for its architectural features and its role as a community space would be managed to conserve defining elements of its fabric while maintaining access for the community, thus simultaneously supporting historical, aesthetic, and social values. Conflicts between values (such as conserving a fragile interior versus opening it to the public) require careful negotiation, ideally involving all relevant stakeholders.²⁸

VBHM carries significant ethical and practical implications. Ethically, it aligns with the view that heritage belongs to the communities who imbue it with meaning, reflecting the spirit of instruments such as the Faro Convention, rather than being the exclusive domain of the state or experts. Practically, by recognizing a broader spectrum of values, VBHM fosters inclusive management strategies and promotes long-term sustainability. For instance, a values-based management plan for an archaeological site may include physical protection of remains (scientific value), interpretation programs reflecting Indigenous perspectives (cultural value), and educational initiatives for the public (social value). This integration of multiple value types increases the likelihood that stakeholders will actively support and participate in heritage conservation.

The values-based approach has been increasingly incorporated into international practice. Advisory bodies of UNESCO, including ICOMOS and ICCROM, promote values-based site management and heritage impact assessments that consider social and cultural dimensions. The UK Heritage Lottery Fund adopted a values-based framework in the early 2000s for project funding, requiring applicants to identify heritage values and articulate anticipated

²⁷ Clark, "Values-Based Heritage Management and the Heritage Lottery Fund in the UK".

²⁸ Clark, "Values-Based Heritage Management and the Heritage Lottery Fund in the UK".

public benefits.²⁹ Similarly, ICCROM's 2015³⁰ guide on people-centered approaches underscores that decision-making should reflect community values and needs, reinforcing VBHM principles in professional practice.

Despite its broad acceptance, VBHM faces practical challenges. Identifying and assessing values can be methodologically complex and occasionally contentious. Stakeholders often hold conflicting values—for instance, a developer may emphasize the economic value of repurposing a historic warehouse, conservators may prioritize its historical value and preservation of original structures, and artists may highlight its social value as a community arts space. VBHM requires negotiation and, at times, compromise. It also assumes that authorities have both the capacity and willingness to facilitate meaningful community participation, which is not always possible, particularly in highly centralized governance contexts.³¹

In China, VBHM principles are partially adopted at the discursive level but rarely fully realized in practice. The 2011 Intangible Cultural Heritage Law explicitly calls for “community involvement,” yet political frameworks limit the actual autonomy of these communities.³²

A notable positive example is the UNESCO Mogao Grottoes, managed by the Dunhuang Academy, where multiple values (historical, artistic, religious, and educational) are assessed. Management includes collaboration with international organizations such as the Getty Conservation Institute, and daily visitor limits (around 6,000 per day) reflect the application of the principle of “value sustainability”.³³ However, the “community” defined in management documents does not include the local population (as the site is uninhabited) but only experts and visitors, reflecting a technocratic form of participation.

In other cases, such as Pingyao, local consultations are largely symbolic, while final decisions rest with state or municipal authorities. Unlike Western models, VBHM in China functions more as a mechanism to validate pre-existing decisions rather than co-produce them. Participation is therefore often

²⁹ Clark, “Values-Based Heritage Management and the Heritage Lottery Fund in the UK”.

³⁰ Sarah Court and Gamini Wijesuriya, *People-Centred Approaches to the Conservation of Cultural Heritage: Living Heritage* (Rome: ICCROM, 2015), https://www.iccrom.org/sites/default/files/PCA_Annexe-2.pdf.

³¹ Ji Li, “Community Participation in Urban Heritage Management: Comparing Chinese and International Practices,” in *Towards a Participatory Approach to Cultural Heritage Management*, book series Creativity, Heritage and the City, volume 7 (Springer Singapore, 2025) DOI: https://doi.org/10.1007/978-981-96-9366-5_3.

³² 中華人民共和國非物質文化遺產法 2011, [author's translation: *Law of the PRC regarding intangible cultural heritage 2011*], <https://www.mct.gov.cn/gtb/index.jsp>.

³³ Jinshi Fan, “Preserving the Mogao Grottoes: Challenges and Strategies,” *China Heritage Quarterly*, no. 33, (2018): 22–35.

performative, a procedural requirement for UNESCO reporting rather than a genuine redistribution of authority.³⁴

In conclusion, VBHM represents a major theoretical shift, reframing heritage from an object of expert care to a space of shared values. It redirects discourse from *how* to conserve heritage toward *why* and *for whom*, emphasizing the preservation of values meaningful to people. This framework also laid the groundwork for subsequent developments, such as sustainable heritage management, which can be seen as an extension of VBHM that explicitly links heritage values to sustainable development objectives. Before examining this approach, it is important to explore how the concept of sustainability has been integrated into heritage as an independent theoretical framework.

Theories of heritage management have increasingly intersected with the concept of sustainability, reflecting the global shift toward sustainable development paradigms in the late 20th and early 21st centuries. *Sustainable Heritage Management (SHM)* does not reject prior frameworks such as VBHM; rather, it builds on them to ensure that heritage protection aligns with long-term ecological, social, and economic sustainability. At its core, SHM asks: *How can heritage sites and practices be managed to meet present needs (of communities, economies, etc.) without compromising the ability of future generations to benefit from that heritage?* This echoes the Brundtland Commission's definition of sustainable development, applied to cultural heritage.³⁵

A key principle of SHM is integrative management: heritage is not treated in isolation but as part of urban and regional planning, tourism management, environmental protection, and community development. UNESCO has been a major advocate for linking heritage with sustainable development. In 2015, it adopted a policy on Culture in Sustainable Development, recognizing that heritage can contribute to all three pillars of sustainability:

1. Social – fostering community identity, cohesion, and education.
2. Economic – supporting cultural tourism, urban regeneration, and creative industries.
3. Ecological – sustaining traditional environmental knowledge and maintaining biodiverse cultural landscapes.

Conversely, sustainable management is essential to protect heritage from threats such as climate change, uncontrolled tourism, and urban development. UNESCO's message is clear: "*heritage is an essential contributor to the broader goal of sustainable development*", and therefore "*comprehensive heritage*

³⁴ Ming Ming Su and Geoffrey Wall, "Community Participation in Tourism at a World Heritage Site: Mutually Reinforcing Relationships or Contested Interests? The Case of Lijiang, China," *International Journal of Tourism Research* 13, no. 6 (2011): 611–626.

³⁵ WCED, *Our Common Future: Report of the World Commission on Environment and Development* (United Nations Brundtland Commission, 1987), <http://www.un-documents.net/our-common-future.pdf>.

management is indispensable". This reflects a paradigm in which heritage conservation and the building of sustainable communities are complementary objectives.³⁶

One manifestation of SHM is the Historic Urban Landscape (HUL) approach, adopted by UNESCO in 2011. HUL shifts focus from individual monuments to the broader urban context, integrating heritage conservation with social and economic development and environmental management. For example, rather than preserving a historic center as a "static museum," HUL promotes the management of urban change so that heritage values are respected while contemporary needs (housing, infrastructure, commerce) are sustainably accommodated. Tools include community participation, assessment of cultural significance alongside social impact, and legal frameworks balancing conservation with development.³⁷

Another critical aspect of SHM is resilience and adaptation to climate change. As climate-related impacts intensify, heritage sites face growing risks such as floods, wildfires, and other environmental hazards. Sustainable management requires risk mitigation planning and enhancing heritage resilience, often through learning from traditional practices. For instance, some cultural landscapes incorporate Indigenous land-management knowledge that can help mitigate environmental risks; integrating these practices simultaneously conserves heritage and protects ecosystems.

SHM also requires a long-term perspective, which may sometimes conflict with short-term interests. Tourism revenue, for example, may tempt authorities to maximize visitor numbers at fragile sites, but sustainability necessitates setting capacity limits and, when needed, restricting access to prevent long-term degradation. The Mogao Grottoes in China exemplify this principle: facing deterioration of ancient murals due to visitor-generated humidity and CO₂, site managers, with international support, instituted strict visitor quotas and built a modern visitor center where tourists can view digital projections of the grotto interiors before accessing a limited number of caves.³⁸ This approach sacrifices some immediate revenue in favor of the site's longevity—a hallmark of sustainable thinking.

Sustainable Heritage Management (SHM) also addresses the economic viability of conservation. Heritage sites require funding and community support

³⁶ UNESCO. Director-General, 2009-2017 (Bokova, I.G.), *Culture and Sustainable Development* (circular letter CL/4206), <https://unesdoc.unesco.org/ark:/48223/pf0000249172>.

³⁷ UNESCO, *Recommendation on Historic Urban Landscape* (Paris: UNESCO, 2011) <https://whc.unesco.org/uploads/activities/documents/activity-638-98.pdf>.

³⁸ Neville Agnew and Martha Demas, *Extended Abstracts of the International Colloquium. Visitor Management and Carrying Capacity at World Heritage Sites in China*. 17-19 May 2013, Mogao Grottoes, Dunhuang (Los Angeles: The Getty Conservation Institute, 2014).

to be maintained, and SHM often promotes adaptive reuse (for example, converting an old industrial building into a mixed-use commercial space) so that heritage remains active and economically productive in contemporary society. The concept of a circular economy is sometimes invoked: heritage should not be seen as a drain on resources but as an asset that, if managed intelligently, can generate employment (through tourism or craft industries) and foster inclusive economic growth. A notable example is the regeneration of the Liverpool Waterfront in the United Kingdom, where historic docks and warehouses were transformed into museums, galleries, and recreational spaces, preserving the area's character while revitalizing the local economy. Yet, Liverpool lost its UNESCO World Heritage status in 2021, highlighting the complexity and challenges of implementing sustainable heritage management.³⁹

At the policy level, many countries and cities integrate heritage into sustainability strategies. The European Union has funded research and programs emphasizing cultural heritage as a driver of sustainable regional development. The ICOMOS Culture Urban Future Report (2016)⁴⁰ provides guidance on leveraging heritage for sustainable urban futures. In Asia, the concept of “sustainable conservation” resonates strongly. For example, Japan's Living National Treasures system supports craft heritage by sustaining practitioners, representing both an economic and social investment in heritage.⁴¹

A major challenge for SHM is measuring and evaluating outcomes across the multiple dimensions of sustainability. Tools such as Heritage Impact Assessments now incorporate social and environmental impacts alongside cultural ones. Another challenge is managing stakeholder expectations, as sustainable management often involves compromise and ongoing dialogue among conservators, developers, residents, and other actors. This requires robust governance mechanisms. In democratic contexts, participatory processes (public consultations, local debates, etc.) can facilitate this balance, whereas in authoritarian regimes, the state may impose sustainability measures (such as relocating residents from protected areas), raising concerns of social equity.

In China, this framework is institutionalized within the discourse of “ecological civilization” (生态文明), though implementation is often uneven.

³⁹ UNESCO World Heritage Centre, “Liverpool – Maritime Mercantile City,” inscribed on the *World Heritage List* in 2004 and delisted in 2021, <https://whc.unesco.org/en/list/1150/>.

⁴⁰ UNESCO. Director-General, 2009-2017 (Bokova, I.G.), *Culture: urban future; global report on culture for sustainable urban development; summary* (Paris: UNESCO, Paris, 2016)

<https://publ.icomos.org/publicomos/jlbSai?html=Bur&base=technica&ref=42718&file=1399.pdf&path=245999e.pdf>.

⁴¹ Tsuneari Fukuda, Tsune Sugimura and Masataka Ogawa, *The Enduring Crafts of Japan: 33 Living National Treasures* (New York/Tokyo: Walker/Weatherhill, 1968).

The 798 District in Beijing exemplifies adaptive reuse: a former industrial complex converted into an arts and cultural hub. While it demonstrates economic revitalization and preservation of industrial memory, material authenticity and the original labor heritage have largely been aestheticized, with the industrial past repurposed as a brand for the urban creative class.⁴² In contrast, the Beijing hutongs experienced widespread demolition during urban regeneration in the 1990s–2000s, later replaced with selective preservation and tourism management programs. Here, SHM encounters pressures from the real estate market and local economic priorities. Nevertheless, in the last decade, authorities have imposed strict demolition limits and promoted the concept of “living historic districts”, a modest step toward social sustainability.

At the declarative level, China has embraced UNESCO’s Historic Urban Landscape (HUL) approach (2011), but implementation remains selective. Pilot projects in Suzhou and Quanzhou demonstrate integrated management combining conservation, urban mobility, and tourism, yet many smaller cities remain at the stage of formal planning.⁴³

In conclusion, Sustainable Heritage Management enriches the theoretical landscape by embedding heritage within the broader framework of sustainability. It encourages heritage managers to act as facilitators of both conservation and community development. SHM is not an independent theory but a transversal framework that overlaps and modifies existing paradigms: VBHM is integral (conserving what people value), and even AHD can be reinterpreted through a sustainability lens, where authorized narratives may emphasize “heritage for development.” The comparative section will illustrate how Europe and China integrate (or struggle to integrate) sustainability in heritage management; for example, European urban heritage projects emphasize community participation, whereas China often adopts state-led heritage tourism strategies, raising the critical question: *whose sustainability is prioritized?*

The concept of cultural landscape has produced a paradigm shift in heritage thinking, dissolving the traditional divide between “cultural” and “natural” heritage and emphasizing their interconnectedness. *Cultural Landscape Theory* posits that landscapes (extensive territories shaped through long-term interactions between humans and their environment) constitute a fundamental unit of heritage, embodying both cultural and natural values.

⁴² Xuefei Ren, *Urban China and the Making of a New Cultural Economy: The Case of 798 Art District* (London: Routledge, 2015).

⁴³ L. Zhang, “Conservation and Gentrification in Beijing’s Hutongs,” *Cities*, no. 86 (2019): 25–35.

This theoretical approach gained formal recognition in 1992, when the UNESCO World Heritage Committee⁴⁴ established three categories of cultural landscapes for inclusion on the World Heritage List:

1. Designed landscapes, intentionally created by humans (e.g., gardens, parks).
2. Evolved landscapes, which may be either relict or continuing, shaped by human activity over centuries and still in use (e.g., agricultural terraces).
3. Associative cultural landscapes, which may have minimal material evidence but hold significance through spiritual or symbolic associations with nature (e.g., sacred mountains, pilgrimage routes).

The concept of the cultural landscape has its roots in geography and anthropology. It was anticipated by the renowned geographer Carl Sauer⁴⁵, who defined a cultural landscape as follows: *“The cultural landscape is fashioned from a natural landscape by a cultural group. Culture is the agent, the natural area is the medium, and the cultural landscape is the result.”* This perspective emphasizes the inseparability of natural environment and human culture in shaping the land. Each landscape simultaneously preserves traces of human activity and natural processes. For instance, rice terraces embody both agricultural technology (culture) and topographical modification (nature), forming an integrated aesthetic and ecological whole.

Cultural Landscape Theory, when applied to heritage management, invites us to value living, inhabited environments, not just isolated monuments. It promotes a holistic vision in which villages, fields, forests, sacred sites, irrigation systems, and the relationships among them together constitute heritage. This perspective contrasts sharply with the monument-centered approach characteristic of early conservation practices. It also aligns with many indigenous and non-Western worldviews, which often do not separate nature from culture, viewing landscapes as living entities imbued with cultural and spiritual significance.

In practice, managing a cultural landscape is complex. It involves not only preserving physical elements (terraces, paths, buildings) but also safeguarding intangible heritage and traditional knowledge (agricultural practices, land-based rituals) and maintaining environmental processes (water cycles, soil fertility, biodiversity) that sustain the landscape's identity. This integrated approach requires multidisciplinary collaboration among ecologists, anthropologists, architects, community leaders, and other specialists.

⁴⁴ UNESCO World Heritage Centre, *Report of the Sixteenth Session: Santa Fe, United States of America, 7-14 December 1992*, (UNESCO, 1992), <https://whc.unesco.org/archive/1992/whc-92-conf002-12e.pdf>.

⁴⁵ Carl O. Sauer, “The Morphology of Landscape,” in *Geography*, Carl O. Sauer, ed., volume II (Berkeley: University of California Press, 1925): 19-53.

A classic example is the Ifugao Rice Terraces in the Philippines⁴⁶ (UNESCO World Heritage). Their conservation extends beyond preventing physical erosion to supporting traditional Ifugao agricultural cycles, rituals, and communal labor systems. Without the people and their practices, the terraces would deteriorate. Similarly, in Europe, the Lavaux Vineyards in Switzerland⁴⁷ are protected as a cultural landscape, with management plans addressing viticulture techniques, landscape quality, and the economic viability of local wine production alongside the conservation of stone terraces.

Cultural Landscape Theory resonates strongly with cultural sustainability and community engagement. Because these landscapes are often inhabited, resident communities play a central role in their management. The framework inherently values local participation and indigenous rights. UNESCO's category of associative cultural landscapes was specifically created to recognize sacred natural sites valued by indigenous peoples (e.g., Uluru in Australia or Pimachiowin Aki in Canada). Even in the absence of built monuments, these landscapes are acknowledged for the associations and traditional custodianship that confer their cultural and spiritual significance.

In Europe, thinking about cultural landscapes has influenced the European Landscape Convention⁴⁸⁴⁹, which treats all landscapes (not only exceptional ones) as deserving careful management due to their contributions to quality of life and cultural identity. The Convention broadens the notion of heritage to include everyday landscapes and emphasizes public participation in landscape-related decisions, reflecting a vision of landscape as a democratic heritage.

In China, the concept of cultural landscape resonates with classical ideas of harmonious landscapes (山水文化 – shanshui culture) and has been adopted in the designation of UNESCO sites, such as the West Lake Cultural Landscape in Hangzhou. However, there is a notable dynamic: many of these sites are managed as scenic parks by government agencies, with a focus on visual-spatial planning and tourism infrastructure. Maintaining the continuity of traditional ways of life (such as those in the Hani terraces of Honghe) becomes challenging under the pressures of tourism and youth outmigration. The Chinese term *wenhua jingguan* ("cultural landscape") is now embedded in heritage discourse,

⁴⁶ UNESCO World Heritage Centre, "Rice Terraces of the Philippine Cordilleras," inscribed on the *World Heritage List* in 1995, <https://whc.unesco.org/en/list/722>.

⁴⁷ UNESCO World Heritage Centre, "Lavaux, Vineyard Terraces," inscribed on the *World Heritage List* in 2007, <https://whc.unesco.org/en/list/1243/>.

⁴⁸ Council of Europe, *The Council of Europe Landscape Convention (ETS No. 176)* (Florence, 2000), <https://rm.coe.int/16807b6bc7>.

⁴⁹ Council of Europe, *Protocol Amending the European Landscape Convention (CETS No. 219)* (Strasbourg, 2016), <https://rm.coe.int/168072d121>.

promoting a more ecosystemic vision of conservation, which can be seen as a significant step forward.⁵⁰

In conclusion, Cultural Landscape Theory expands the scope of heritage management to encompass the full matrix of human–nature relationships. It advocates for the preservation of the character of places, not just individual objects, and calls for cross-sector collaboration across heritage, agriculture, forestry, tourism, and other fields. It also serves as a bridge between tangible and intangible heritage, as managing a landscape almost always involves immaterial dimensions. This framework has enriched heritage thinking by promoting more inclusive and ecologically attuned approaches. It reminds us that the significance of a temple often extends to the mountain it overlooks and the forest that surrounds it, and that a historic town cannot be separated from the rural landscape that sustained it. The next section, on heritage tourism, intersects with Cultural Landscape Theory, as many of these landscapes are tourist destinations requiring careful management of visitor impacts in relation to the needs of local communities.

Heritage and tourism are deeply interconnected: heritage sites often become tourist attractions, while tourism in turn influences how heritage is presented and managed. *Heritage Tourism Theory* examines this interaction, drawing on sociology and anthropology concepts, notably John Urry’s “tourist gaze”⁵¹ and Dean MacCannell’s analysis of authenticity⁵², to understand tourist behavior and its consequences for heritage management. Two central ideas define this field: the tourist gaze, describing how visitors perceive and consume heritage, and authenticity, which addresses what it means to have a genuine heritage experience and how such experiences are constructed or staged.

John Urry’s concept of the tourist gaze, outlined in *The Tourist Gaze*⁵³, asserts that tourists do not view the world innocently; their gaze is socially organized and culturally conditioned. Tourists travel with expectations shaped by guidebooks, photographs, films, and marketing, seeking images that confirm pre-existing mental representations of a place. Consequently, the tourist gaze often focuses on the picturesque, monumental, or exotic. In heritage terms, this may manifest as attention to famous ruins, imposing castles, historic streetscapes, or colorful rituals. As summarized in a synthesis: “*The tourist gaze describes the organized ways in which visitors observe and interpret travel destinations, often influenced by prior cultural expectations or representations.*”

Tourists prioritize experiences and landscapes deemed “worthy of tourism” (postcard views, iconic relics) while often overlooking everyday

⁵⁰ Mingxia Xu, “Sustaining the Hani Terraces: Cultural Landscape and Rural Transformation,” *Heritage & Society* 10, no. 2 (2017): 145–163.

⁵¹ Urry, *The Tourist Gaze*.

⁵² MacCannell, “Staged Authenticity”.

⁵³ Urry, *The Tourist Gaze*.

realities. This has practical implications: heritage managers may shape site presentations to satisfy these expectations, emphasizing certain aspects (e.g., restoring a palace façade for photographs) and obscuring others (e.g., modern constructions or surrounding poverty). The tourist gaze can also produce performative behavior, with locals and sites adapting to meet visitor expectations—a phenomenon MacCannell terms staged authenticity.

Dean MacCannell, in his seminal work *Staged Authenticity*⁵⁴, argued that modern tourists are motivated by a desire for authenticity (the experience of something real and different from their daily lives) but often encounter a staged version of local culture created for their consumption. He describes tourist environments as having “frontstage” zones (visible, staged) and “back-stage” areas (where real life occurs). For example, a traditional dance may be performed nightly for tourists (frontstage), while authentic ritual dances of the community (back-stage) diminish as performers are occupied with tourist spectacles. MacCannell noted that tourists often sense the lack of authenticity and attempt to access the backstage, yet as tourism expands, these areas become increasingly inaccessible. This theory remains relevant today, as heritage sites continue to navigate the challenge of presenting culture without reducing it to an empty spectacle.

The concept of authenticity in heritage tourism has multiple dimensions. Traditionally, experts evaluated authenticity based on material integrity—the originality of structures and materials (unaltered, not reconstructed). This is object-based authenticity. Tourists, however, experience authenticity more subjectively, as an emotional or existential state. Ning Wang⁵⁵ distinguishes among three forms:

1. Objective authenticity – museum-style evaluation: is the artifact genuine or a replica?
2. Constructed authenticity – the result of social constructions and expectations; for instance, a themed medieval village may appear authentic to tourists if it aligns with their mental image of the Middle Ages.
3. Existential authenticity – a personal sense of engagement or self-discovery, regardless of objective reality.

Many tourists are satisfied with constructed authenticity: visiting a “recreated” historic city or attending a historical reenactment can be fulfilling even if purists consider it inauthentic. This presents a dilemma for heritage managers: should a degree of theatricality be allowed to enhance visitor satisfaction, or should historical accuracy be preserved strictly?

⁵⁴ MacCannell, “Staged Authenticity”.

⁵⁵ Ning Wang, “Rethinking Authenticity in Tourism Experience,” in *Annals of Tourism Research*, vol. 26, no. 2, (1999): 349-370.

Bran Castle in Romania provides a striking illustration. Globally known as “Dracula’s Castle,” Bran is an authentic medieval fortress and a national historic monument; however, its worldwide fame largely stems from the Dracula myth. Tourist marketing amplifies this association—through Gothic décor and a mysterious atmosphere—catering to visitors seeking an “authentic” vampire experience. On-site, one observes a mixture of historical interpretation and themed souvenirs. Researchers such as Huebner⁵⁶ have noted that many visitors arrive with rich media-shaped images and express delight when the castle confirms those expectations, even if the historical reality is markedly different. The coexistence of historical and legendary narratives contributes to Bran Castle’s “contested aura,” which some argue enriches the tourist experience. For purists, this raises the question: is heritage trivialized? For proponents of sustainable tourism, the challenge is how to leverage popular interest without compromising the site’s authenticity and integrity.

The tourist gaze highlights that what visitors value—and are willing to pay for—often diverges from what experts prioritize. Tourists frequently seek aesthetic pleasure, entertainment, and novel experiences. As a result, a visually striking site (e.g., highly photogenic on social media) may attract more visitors than one of major historical significance but less visual appeal. As Urry notes, tourist behavior is also shaped by the collective culture of travel—people pursue experiences that they see others enjoying, increasingly mediated by social media. This dynamic can generate excessive pressure on iconic sites (overtourism) while leaving others under-visited. Managing the spatial and temporal flow of visitors becomes critical, hence measures such as timed-entry tickets or redirecting tourists to secondary attractions.⁵⁷

From a theoretical standpoint, Heritage Tourism Theory encourages heritage professionals to see themselves as interpreters or experience designers. Conservation alone is insufficient; managers must also communicate a site’s significance engagingly and facilitate a meaningful or satisfying visitor experience. Interpretation theories, such as Freeman Tilden’s principles, are particularly relevant here, emphasizing that interpretation should relate to visitors, provoke thought, and reveal deeper meanings.⁵⁸

Authenticity in presentation is contested. The Nara Document on Authenticity (1994)⁵⁹ expanded the concept, recognizing that different cultures

⁵⁶ Anna Huebner, “Who came first – Dracula or the Tourist? New Perspectives on Dracula Tourism at Bran Castle,” in *European Journal of Tourism Research*, vol. 4, no. 1 (2011): 55-65.

⁵⁷ Urry, *The Tourist Gaze*.

⁵⁸ Freeman Tilden, *Interpreting Our Heritage*, third edition (Chapel Hill: The University of North Carolina Press, 1977).

⁵⁹ ICOMOS, *The Nara document on authenticity* (Nara, 1994), https://www.icrom.org/sites/default/files/publications/2020-05/convern8_06_thenaradocu_ing.pdf.

may have distinct understandings, not always centered on materiality. For instance, periodic reconstruction of a temple according to traditional methods may be considered authentic in cultures where renewal is valued over original material. In many non-Western contexts, strict material authenticity is more flexible. In China, wooden temples have been rebuilt periodically over centuries, maintaining continuity through technique and form rather than original materials. Both Chinese tourists and authorities may thus regard a reconstruction as “authentic,” contrasting with the Western preference for the “patina of age.”

Additional Chinese examples illustrate these dynamics. Lijiang, a historic Naxi city inscribed as UNESCO World Heritage in 1997⁶⁰, demonstrates how mass tourism has driven gentrification, relocation, and the staging of traditions. Objective authenticity has been replaced by performative authenticity: dances, cuisine, and crafts adapted to urban visitors’ tastes. This aligns precisely with MacCannell’s notion of staged authenticity, a constructed yet accepted form of authenticity for tourists.

In Dali⁶¹ and Wuzhen⁶², architectural heritage has been meticulously restored, but original communities were largely displaced. Authorities have increasingly promoted the concept of an “authentic experience” in modern cultural parks; for example, Yuanmingyuan⁶³ has been recontextualized as a space for “patriotic reflection”. Here, authenticity derives not from historical materiality but from emotional resonance with the state’s narrative.

Overall, Chinese heritage tourism confirms Urry’s hypothesis: the tourist gaze is socially and politically constructed, and in China, this process is actively regulated by the state.

In conclusion, Heritage Tourism Theory introduces a dynamic, visitor-centered dimension to heritage management. It compels managers to consider demand-side factors: what audiences seek, how they behave, and how this influences heritage. It introduces key concepts such as carrying capacity (the number of visitors a site can sustain without damage), interpretation and storytelling as management tools, and the need to manage commercialization and community impacts. A critical theoretical debate concerns whether commercialization diminishes heritage’s value or, conversely, can support its conservation—a discussion that connects to broader heritage theory debates on

⁶⁰ UNESCO World Heritage Centre, “Old Town of Lijiang,” inscribed on the *World Heritage List* in 1997, <https://whc.unesco.org/en/list/811/>.

⁶¹ UNESCO World Heritage Centre, “Dali Chanshan Mountain and Erhai Lake Scenic Spot,” submitted on the *Tentative Lists* in 2001, <https://whc.unesco.org/en/tentativelists/1634/>.

⁶² UNESCO World Heritage Centre, “The Ancient Waterfront Towns in the South of Yangtze River,” submitted on the *Tentative Lists* in 2008, <https://whc.unesco.org/en/tentativelists/5328/>.

⁶³ UNESCO World Heritage Centre, “Summer Palace, an Imperial Garden in Beijing,” inscribed on the *World Heritage List* in 1998, <https://whc.unesco.org/en/list/880/>.

universalism versus relativism, tangible versus intangible values, and the adaptation of Western theories to diverse cultural and political contexts.

Theoretical Debates and Cross-Cutting Themes

Throughout the exploration of the theoretical frameworks presented above, several recurring debates emerge. This section highlights three major controversies in heritage management theory: universalism versus cultural relativism, tangible versus intangible heritage, and the application of Western theories in non-Western or authoritarian contexts. These debates cut across all frameworks and shape our understanding of heritage in a global context.

Universalism vs. Cultural Relativism. This debate asks whether there are universal heritage values and approaches that transcend cultural boundaries, or whether heritage must be understood primarily within its specific cultural context.

The universalist perspective is exemplified by concepts such as UNESCO's Outstanding Universal Value (OUV), which asserts that certain heritage sites possess significance so exceptional that they belong to the entire human community. This vision underpins the World Heritage system and presumes the existence of shared standards, for example, criteria relating to architectural beauty or historical importance. Universalism aligns with Enlightenment ideals of world heritage as a tool for fostering global understanding and corresponds to the Authorized Heritage Discourse (AHD) tendency to privilege a canon of heritage masterpieces, often Eurocentric in scope.

In contrast, cultural relativism holds that what is considered heritage depends on its cultural context. The meaning of a site is largely shaped by the history, beliefs, and needs of the local community; external values should not be imposed. For instance, a sacred forest for a tribal community may have limited "universal" historical or artistic significance but profound importance for the identity and spiritual life of that community. Relativism maintains that such significance is fully valid and cannot be equated with the "universal" value of a Renaissance cathedral.

In practice, this debate is rarely binary. UNESCO has sought to balance these perspectives, especially following critiques of Western bias. The inclusion of intangible heritage and community empowerment⁶⁴ (exemplified by the Faro Convention⁶⁵, which emphasizes the "right to heritage" and defines heritage as what people consider valuable) reflects a relativist orientation, recognizing the diversity of heritage forms and the legitimacy of local perspectives.

⁶⁴ UNESCO, *Convention for the Safeguarding of the Intangible Cultural Heritage*.

⁶⁵ Council of Europe, *Council of Europe Framework Convention on the Value of Cultural Heritage for Society* (Faro, 2005).

The tension between universalism and relativism is particularly evident in the process of inscribing sites on the World Heritage List. For example, when China nominates sites, it must articulate their significance in terms recognized by the international community, sometimes resulting in a strategic framing of value. The Mogao Grottoes⁶⁶ in Dunhuang were inscribed primarily for their Buddhist art of Outstanding Universal Value, rather than for their significance within Chinese national heritage or their local religious function. Conversely, some sites central to a nation's identity may remain unlisted if they do not align with internationally recognized "universal" themes.

This raises a critical question: might "universal value" reflect a Western perspective in disguise? Early World Heritage lists were dominated by European monuments and natural sites evaluated according to Western aesthetics (monumentality, antiquity). Subsequent reforms have broadened this view, with greater inclusion of cultural landscapes, industrial heritage, and sites of memory, such as genocide memorials—signaling an expanded understanding of universal value.

In conclusion, this debate invites critical reflection: whose heritage matters, and to whom? A balanced approach (both theoretically and practically) seeks to recognize the universality of certain human themes (art, architecture, creativity, cultural exchange) while respecting cultural specificity, avoiding uniform valuations of significance. It suggests that heritage managers must exercise cultural sensitivity and adopt layered assessments of significance, spanning global, national, and local scales.

Tangible vs. Intangible Heritage. The distinction between tangible and intangible heritage has been one of the most transformative debates in recent decades. Traditionally, heritage conservation focused almost exclusively on tangible heritage—physical artifacts, buildings, and sites. However, as discussed earlier, numerous scholars and cultural communities have argued for the recognition of intangible cultural heritage (ICH): living cultural expressions, knowledge, and skills transmitted across generations. The 2003 *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage*⁶⁷ marked a turning point, asserting that heritage encompasses not only monuments but also "practices, representations, expressions, knowledge, and skills" that communities recognize as integral to their identity. This represented, in part, a corrective to the material-focused perspective promoted by the Authorized Heritage Discourse (AHD) and the World Heritage framework, while also responding to postcolonial critiques emphasizing the need to protect indigenous and local traditions alongside stones and bones.

⁶⁶ UNESCO World Heritage Centre, "Mogao Caves", inscribed on the *World Heritage List* in 1987, <https://whc.unesco.org/en/list/440>.

⁶⁷ UNESCO, *Convention for the Safeguarding of the Intangible Cultural Heritage*.

The theoretical implications are profound. Intangible heritage does not “exist” in a static sense; it is interpreted, practiced, and recreated by each generation (for example, a song or craft technique). Consequently, its preservation cannot mean freezing it in time, but rather keeping it alive—transmitting knowledge, providing conditions for practice, and allowing adaptation. This approach contrasts sharply with the conservation of a building, where stability and minimal change are primary goals. Protecting intangible heritage requires new management methods, often drawn from social development fields: supporting tradition-bearers, documenting oral traditions, and facilitating adaptation to contemporary contexts to maintain viability. While this raises questions of authenticity, many accept that change is an inherent part of living heritage.

The integration of intangible heritage into general heritage theory also challenges the expert authority emphasized by AHD. While experts can study and facilitate safeguarding, intangible heritage belongs to the communities themselves; they are the primary authorities regarding its value and significance. This supports the shift toward people-centered heritage management.

Conceptually, the line between tangible and intangible is often blurred. Many heritage phenomena are hybrid: a temple (tangible) may be the center of rituals and performing arts (intangible); a cultural landscape combines traditional agricultural practices (intangible) with the cultivated terraces themselves (tangible). Increasingly, theorists refer to biocultural heritage or a nature-culture continuum, recognizing their interdependence. The tangible-intangible debate thus moves toward a holistic understanding. The Nara Document on Authenticity (1994)⁶⁸, already emphasized that authenticity and heritage must be understood in cultural context, including intangible aspects such as the spirit and atmosphere of a place.

In practice, heritage management organizations have had to broaden their expertise, collaborating not only with architects and archaeologists but also with ethnographers and cultural anthropologists. Museums, for example, no longer limit themselves to conserving objects but also document oral histories, crafts, and associated knowledge. In situ management plans for World Heritage sites now frequently include measures to protect associated intangible heritage (festivals, crafts, traditional land-use practices), recognizing that such elements are integral to the significance and sustainability of the site.

European examples include the recognition of traditional craftsmanship as intangible heritage: the art of violin-making in Cremona⁶⁹ or the cooperative

⁶⁸ ICOMOS, *The Nara document on authenticity* (Nara, 1994).

⁶⁹ UNESCO, “Traditional Violin Craftsmanship in Cremona,” inscribed on the *Representative List of the Intangible Cultural Heritage of Humanity*, in 2012, <https://ich.unesco.org/en/RL/traditional-violin-craftsmanship-in-cremona-00719>.

culture of French baguette baking⁷⁰ (recently added to the UNESCO ICH list). These cases demonstrate how European authorities incorporate intangible dimensions, acknowledging that without the human element, tangible heritage loses context and meaning.

In China, intangible heritage has become central to cultural policy over the past two decades, with thousands of practices catalogued and numerous “heritage bearers” supported by the state. This aligns with national cultural strategies and, likely, soft power objectives. However, this top-down management (standardized festivals, folk arts transformed into performances) raises questions about whether excessive formalization intended to “preserve” traditions may fundamentally alter them. An active debate continues: how can intangible heritage be safeguarded without freezing or fossilizing it, while ensuring genuine community participation?

Theoretically, the inclusion of intangible heritage has made heritage discourse more inclusive, dynamic, and people centered. It challenges the materialist bias of traditional conservation and enriches frameworks such as Values-Based Heritage Management (VBHM), since heritage values often derive as much from intangible associations as from physical structure. Today, it is widely accepted that effective heritage management must address both tangible and intangible dimensions; for example, the conservation of a historic building (tangible) must be accompanied by the support of the performative traditions (intangible) for which it was created.

Western Heritage Theory in Non-Western Contexts (Transferability). A final major debate concerns the applicability of established heritage-management theories across different governance systems and cultural paradigms. Many of the frameworks examined (AHD, VBHM, and even sustainability as articulated by international bodies) emerged within Western democratic contexts (Europe, North America, Australia) and assume certain enabling conditions: active civil society, rule-of-law governance, and broadly liberal values. This raises a central question: How do these theories translate into settings with different political systems (socialist, authoritarian) or fundamentally different cultural values?

China provides a revealing case. Heritage governance there is characterized by strong state control and an instrumental view of heritage as a resource for nation-building and economic development, particularly through tourism. Elements associated with AHD are explicit: heritage is often what the state authorizes as significant, closely tied to narratives of Chinese civilization and patriotic education. Community activism (central to VBHM in Western contexts) has fewer outlets due to constraints on civil society. In Europe, non-governmental organizations and local “heritage friends” groups play visible,

⁷⁰ UNESCO, “Artisanal know-how and culture of baguette bread”, inscribed on the *Representative List of the Intangible Cultural Heritage of Humanity*, in 2022, <https://ich.unesco.org/en/RL/artisanal-know-how-and-culture-of-baguette-bread-01883>.

sometimes decisive, roles; in China, independent advocacy is limited, and most decisions are taken top-down through government cultural bureaus. This constrains the practical application of frameworks premised on participatory governance. Comparative studies show that although pilot projects experiment with community collaboration, actual participation tends to be minimal or highly curated. Government agencies may solicit opinions but retain full decision-making authority—an arrangement best understood as consultative authoritarianism, not genuine power-sharing.⁷¹

Transferability is possible, but only through adaptation. For example, values-based management in China is often reinterpreted as balancing state-defined priorities (national historical significance, social harmony, economic benefit) rather than as an open negotiation among stakeholders. Likewise, the language of sustainability appears prominently in policy documents, but economic growth typically prevails when trade-offs emerge. Nevertheless, Chinese heritage experts are well versed in international theory and have integrated it into national guidelines such as the China Principles⁷², which draw from international charters but adapt them to local conditions. A notable example of such adaptation is China's long-standing argument for a more flexible understanding of authenticity (such as the acceptability of reconstruction using traditional methods) an interpretation that influenced global theory and contributed to the Nara Document on Authenticity (1994).⁷³

Authoritarian systems also align naturally with AHD's hierarchical structure and centralized narrative production. In such contexts, challenging official heritage narratives may be suppressed or ignored. States may elevate sites that reinforce national identity while marginalizing or destroying places associated with minority groups or politically sensitive histories. This raises a fundamental theoretical question: Do Western frameworks adequately account for power and politics? Critical heritage studies, influenced by sociology and postcolonial theory, argue that heritage must be understood as a governance mechanism and a discourse of power—as seen in AHD itself and in Brian Graham's work on heritage as political instrument⁷⁴. In many parts of the world, heritage management is not a neutral technical field but is intertwined with identity formation, censorship, and conflict.

Non-Western contexts may also operate with different epistemologies of heritage. Many Asian and African traditions emphasize continuity and renewal

⁷¹ Li, "Community Participation in Urban Heritage Management".

⁷² *Principles for the Conservation of Heritage Sites in China*, issued by China ICOMOS and approved by the State Administration of Cultural Heritage (Los Angeles: Getty Conservation Institute, 2002).

⁷³ ICOMOS, *The Nara document on authenticity* (Nara, 1994).

⁷⁴ Brian Graham, "Heritage as Knowledge: Capital or Culture?," in *Urban Studies*, 39(5-6) (2002): 1003-1017.

rather than static material preservation. Sacred value may outweigh material authenticity: for instance, the annual repainting of a temple may be understood as an essential devotional act, not as degradation of an “original” fabric. Such examples demonstrate that mechanical application of the Venice Charter, with its emphasis on material integrity, can be inappropriate. The emergence of the Nara Document⁷⁵ reflects precisely this recognition: cultural values shape what counts as authentic and what requires preservation. Any global framework must therefore be sufficiently flexible to accommodate local principles.

The World Heritage system has gradually moved in this direction by recognizing more diverse site categories and interpretive approaches. In recent years, scholars have even identified a distinctive Asia-Pacific conservation ethos, characterized by the prioritization of use, renewal, and craft-based continuity in Japan, China, India, and elsewhere—contrasting with Europe’s emphasis on preserving original fabric. These approaches can be complementary, but when international standards are applied rigidly by Western-trained professionals, tensions or even unintended harm to local traditions may result. For example, prohibiting the continued use of an old structure may strip it of living cultural value and erode its significance for the community.

In sum, the debate on transferability compels scholars and practitioners to adopt a reflexive stance: to distinguish between what is universal (such as the intergenerational transmission of heritage) and what is culturally specific (methods, priorities, symbolic meanings). It calls for a pluralization of heritage theory, in which Western concepts are reinterpreted through other cultural lenses. This process is already underway through international forums, academic exchanges, and regionally informed conservation training. The ultimate goal is a globally grounded, culturally sensitive heritage-management theory capable of avoiding cultural imperialism while remaining analytically robust and practically workable.

Comparative Perspectives: Europe and China

After outlining the principal theoretical frameworks and conceptual debates, the focus shifts to how these ideas materialize in two major contexts: Europe (originator of many heritage doctrines and shaped by pluralistic democracies) and China, a socialist state with a distinct paradigm of cultural heritage governance. Examining them side by side highlights both convergence and divergence. The core challenges of heritage management (preserving significance, involving communities, balancing conservation with development) are broadly shared, yet the methods and priorities differ markedly. Governance systems, historical trajectories, cultural values, and socio-economic imperatives all shape these contrasts.

⁷⁵ ICOMOS, *The Nara document on authenticity* (Nara, 1994).

In Europe, the Authorized Heritage Discourse (AHD) emerged through national museums, early monument protection laws (such as France's 1913 *Monument Law*⁷⁶ or the creation of the *National Trust*⁷⁷ in the UK), and through UNESCO—an institution whose early decades were dominated by European experts. Over time, however, European heritage management increasingly embraced pluralist and participatory perspectives.

Today, many European states possess strong mechanisms for identifying local heritage, conducting public consultation in planning, and supporting active non-governmental heritage organizations. The European AHD has been challenged from within by movements such as ecomuseums (community-driven museums), by the formal inclusion of social values in assessment (e.g., English Heritage's shift toward "public value" in the 2000s), and by the recognition of vernacular and minority heritages—from Celtic revival in Brittany to the protection of industrial landscapes at Ironbridge.

The *Faro Convention*⁷⁸ crystallizes this modern European orientation. It defines cultural heritage as a resource for human development and for fostering cultural diversity and intercultural dialogue. Crucially, it introduces the notion of a "right to heritage" as part of the broader right to participate in cultural life. This marks a clear departure from the strictly expert-driven AHD toward a more democratic framework.

Consequently, although European states continue to maintain official lists and expert bodies, heritage discourse now (at least in principle) integrates community perspectives and acknowledges the plurality of narratives. An increasing number of countries, for example, formally recognize immigrant heritage or "difficult heritage," including Soviet-era sites in Eastern Europe.

China, by contrast, maintains a strong form of AHD rooted in state authority. The official narrative emphasizes the grandeur of Chinese civilization (ancient dynasties, major inventions, world-heritage sites as symbols of national prestige) and, more recently, the unity of a multi-ethnic nation. This discourse is reinforced through school curricula, state media, and large-scale heritage theme parks.

For instance, the Mogao Grottoes are framed not only as masterpieces of Buddhist art but as evidence of China's historic cosmopolitanism along the Silk Road—integrated into a broader narrative of China as a historic driver of globalization. Unlike in Europe, where civil society often openly critiques AHD,

⁷⁶ Loi du 31 décembre 1913 sur les monuments historiques [Act of 31 December 1913 on Historical Monuments], *Journal officiel de la République française* [J.O.], January 4, 1914, <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000000315319>.

⁷⁷ *National Trust Act* 1907, https://www.legislation.gov.uk/ukla/Edw7/7/136/pdfs/ukla_19070136_en.pdf.

⁷⁸ Council of Europe, *Council of Europe Framework Convention on the Value of Cultural Heritage for Society* (Faro, 2005).

such challenges in China remain limited. Instead, the state selectively adapts AHD to incorporate local elements while retaining full authority over interpretation.

An illustrative example is the 2013 *Hangzhou Declaration*⁷⁹, a UNESCO document strongly influenced by Chinese leadership, which frames heritage as a “driver of development.” This formulation mirrors China’s emphasis on heritage as an economic asset—through tourism, cultural industry zones, and urban redevelopment. The approach retains a top-down authorized discourse (the state determines the role of heritage in development) while expanding the notion of heritage value beyond aesthetics and history to include social and economic dimensions. It signals movement toward value-based frameworks but without meaningful community empowerment.

In Europe, value-based heritage management has shaped numerous major projects. A prominent example is the historic city of Bruges⁸⁰ (Belgium), a UNESCO World Heritage urban landscape. Bruges developed a management plan that explicitly outlines the full spectrum of its heritage values—architectural, historical, and those tied to its character as a living city with active traditions and intangible cultural practices. When new interventions are proposed

(such as infrastructure upgrades or contemporary insertions) their impact is assessed against these values, and local stakeholders (residents, business owners, civic groups) are formally included in the decision-making process. Public consultation procedures are firmly embedded in the governance structure.⁸¹

Conflicts still arise (particularly concerning tourism pressure or debates about integrating contemporary architecture into historic centers) but across much of Europe there is a baseline expectation that communities will have a meaningful voice. Even in states with a strong tradition of centralized authority over heritage, such as France with its hierarchical Monuments Historiques system, public debate and local mobilization are vigorous. Protests triggered by threats to community-valued buildings are a recurring phenomenon.⁸²

⁷⁹ UNESCO, *The Hangzhou Declaration: Placing Culture at the Heart of Sustainable Development Policies* (Hangzhou, 2013).

⁸⁰ UNESCO World Heritage Centre, *Historic Centre of Brugge*, inscribed on the *World Heritage List* in 2000, <https://whc.unesco.org/en/list/996/>.

⁸¹ City of Bruges, *Bruges, UNESCO World Heritage Property. Management Plan – synopsis*, (Bruges: The City Council of Bruges, 2012), <https://www.brugge.be/sites/default/files/2024-03/ManagementPlanSummaryEN.pdf>.

⁸² Christer Gustafsson and Matthias Ripp, “Urban Transformation and Related Conflicts at UNESCO World Heritage Sites,” in *50 Years World Heritage Convention: Shared Responsibility – Conflict & Reconciliation*, (Springer, 2022): 85-97.

EU-level programs (including the European Heritage Days and the European Heritage Label⁸³) further reinforce community involvement and cross-border value exchange, promoting a shared and participatory understanding of European heritage.

In China, community engagement exists but is more sporadic and often driven by academics, local officials with vision, or specific project teams rather than by broad national policy. The historic walled city of Pingyao offers a well-documented case. After World Heritage inscription, tourism boomed in the early 2000s, and residents were initially marginalized or relocated from the urban core. Over time, planners and researchers recognized that lived traditions, residential courtyards, and local customs were integral to Pingyao's significance. Subsequent initiatives improved living conditions and integrated residents into the heritage economy through homestays, craft markets, and local entrepreneurship. This marks a gradual acknowledgment of social values, although the framing remains strongly tied to tourism development.⁸⁴ While such projects are not widespread, they illustrate the potential for adapting participatory models within Chinese governance structures.

A comparative analysis by Li⁸⁵ on community participation in China versus international practice found that global standards integrate community involvement at every stage of heritage management (from identification through monitoring) whereas in China consultation tends to appear only in later phases or in a controlled form. Although both models express a theoretical commitment to community empowerment, the Chinese system remains state-driven, with participation occurring only minimally in practice. The study recommended learning from international experience while adapting it critically to China's cultural and political context—a localized reinterpretation of VBHM.

This gradual evolution can be seen in recent urban regeneration projects experimenting with public hearings and participatory consultations. Nonetheless, genuine power-sharing with civil society in heritage governance remains at an early stage.

The Mogao Grottoes⁸⁶ (see Figure 1) exemplify how international principles can be applied successfully within China's system. Inscribed on the World Heritage List in 1987, Mogao faced severe deterioration risks in the 1990s

⁸³ European Commission, *Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Evaluation of the European Heritage Label Action 2018-2024*, COM (2025) 366 final (Brussels, 2025), <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A52025DC0366&utm>.

⁸⁴ Lisheng Weng et al., "Sustainability Assessment of Cultural Heritage Tourism: Case Study of Pingyao Ancient City in China," in *Sustainability*, 11(5) (2019), DOI: <https://doi.org/10.3390/su11051392>.

⁸⁵ Li, "Community Participation in Urban Heritage Management".

⁸⁶ UNESCO World Heritage Centre, "Mogao Caves".

due to visitor pressure. In response, Chinese authorities established a long-term partnership with the Getty Conservation Institute beginning in 1989, gaining access to advanced conservation science and value-based planning methods.

A master plan was developed that explicitly identified the site's core values: the artistic value of the mural paintings and sculptures; the historical value of Mogao as a key Silk Road hub; the spiritual value for Buddhist communities; and the economic value associated with regional tourism. The plan's objective was not to increase visitor numbers but to safeguard and transmit these values.⁸⁷

Concrete measures included installing environmental control and monitoring systems in the caves, creating high-quality replica caves to absorb part of the visitation demand, and constructing a visitor center where introductory interpretive films are shown before entry. This design reduces the time spent inside the caves and mitigates cumulative humidity and other physical impacts.⁸⁸

This constitutes a textbook example of sustainable heritage management. Scientific studies of carrying capacity established an upper limit of roughly 3,000 visitors per day, and the administration enforced this cap even when demand was significantly higher—particularly after intensified promotion of the Silk Road narrative. The Dunhuang Academy also undertook comprehensive digital documentation of the caves, a value-driven decision intended to preserve the artistic record should physical deterioration occur.⁸⁹

These strategies combine several theoretical frameworks:

- Value-based approaches (explicit identification and long-term protection of multiple heritage values).
- Sustainability principles (prioritizing conservation over short-term gains).
- A nuanced form of AHD, shaped through collaboration between national and international experts—though community participation remains minimal, as the site is uninhabited and the relevant “communities” are primarily scholars and, to a degree, global Buddhist audiences.

Notably, Mogao also incorporates insights from tourism theory. By carefully structuring the visitor experience (introductory films, rotation of accessible caves, standardized guide training) the management effectively shapes the “tourist gaze” to emphasize artistic and historical appreciation rather than sensationalism or uncontrolled photography (prohibited for conservation reasons).

The success of Mogao is widely promoted as a model for other Chinese heritage sites. It demonstrates that, even within an authoritarian governance

⁸⁷ Agnew and Demas, *Extended Abstracts of the International Colloquium*.

⁸⁸ Agnew and Demas, *Extended Abstracts of the International Colloquium*.

⁸⁹ Agnew and Demas, *Extended Abstracts of the International Colloquium*.

structure, strong political will and adequate resources can enable the implementation of international best practices. Yet Mogao's achievements relied heavily on a visionary leadership within the Dunhuang Academy and committed international partners—conditions far from universal.

For a European counterpoint, this paper examines Bran Castle in Romania, a case that highlights different challenges (less material than narrative) and tied to questions of authenticity within a post-communist economic transition. Nationalized under the communist regime, restituted to the royal family in the 2000s, and now operated as a private museum, Bran embodies a complex negotiation between official history and global tourist expectations.

Initially, the Romanian state's authorized discourse emphasized the castle's documented history: a 20th-century royal residence and medieval fortress guarding a major trade route. Yet international tourism centered almost exclusively on the Dracula myth. In the early post-communist years, authorities hesitated to promote the legend for fear of trivializing national heritage. Over time, economic pragmatism prevailed; today, Bran Castle embraces its Dracula association and attracts hundreds of thousands of visitors annually.⁹⁰

This has generated persistent tension between the authorized historical narrative favored by experts and the popular, commercially driven narrative embraced by visitors and the tourism industry. The current interpretation is a compromise: exhibitions present both Vlad the Impaler and Bram Stoker's novel, alongside authentic historical furniture and documentation. Meanwhile, the surrounding area is dominated by Dracula-themed souvenir stalls.⁹¹

Scholars such as Light⁹² argue that, although this commercialization may appear to dilute heritage authenticity, it has revitalized the local economy and turned Bran into a global landmark. Debates about authenticity play out openly: some visitors leave with distorted historical impressions, while others encounter genuine Romanian folklore and architecture through their search for the myth.

As a European state, Romania is influenced both by Western conservation frameworks and by its own national priorities. Since EU accession in 2007, European cultural programs have increasingly supported participatory projects, heritage interpretation training, sustainable tourism initiatives, and community engagement. The current management of Bran Castle reflects a blend of authorized heritage discourse (ensuring the monument's physical integrity under state oversight) and pragmatic adaptation to tourism demand.

This case exemplifies a broader European challenge: managing "unofficial" narratives (fictional associations, popular myths, even conspiratorial

⁹⁰ *Dracula's Castle*, Bran Castle official website, www.dracula-castle.ro.

⁹¹ Tuomas Hovi, *Heritage through Fiction: Dracula Tourism in Romania* (Turku: University of Turku, 2014).

⁹² Duncan Light, "Dracula tourism in Romania Cultural identity and the state", in *Annals of Tourism Research*, 34(3) (2007), pp. 746-765.

reinterpretations) alongside scholarly narratives. Europe offers many parallels, such as the Sherlock Holmes Museum in London⁹³, where a fictional home is treated as a heritage site. The prevailing European approach is to allow multivocal narratives to coexist, provided the site's material integrity is safeguarded. This aligns with a postmodern view of heritage as a space of negotiated meanings among experts, communities, and the wider public.

Urban heritage zones in Europe (such as the historic centers of Florence, Edinburgh, and many other old towns) are generally managed through frameworks that integrate conservation with contemporary urban life. Europe pioneered “integrated conservation” in the 1970s; for example, the 1975 Council of Europe Declaration⁹⁴ emphasized adapting historic buildings to new uses to keep them viable.

Most European cities employ strict planning regulations to protect the character of historic districts (height controls, façade guidelines) alongside incentives encouraging rehabilitation for modern use (tax relief, grants). Public-private partnerships are common in funding urban heritage projects. Moreover, community participation is increasingly mandated in urban planning law. In Tallinn⁹⁵ (Estonia), for example, updates to the heritage management plan include public forums, resident feedback, and transparent discussion of proposals—imperfect but deeply embedded in European conceptions of heritage as part of community development.

In China, urban heritage zones (often designated as “historic-cultural blocks” or “famous historical and cultural cities”) face intense development pressures. Traditional approaches often involved either “museumification” (transforming old towns into tourist enclaves with resident displacement) or façadism (retaining superficial historic façades masking new structures). Influenced by international best practices and domestic advocacy, some cities now pursue more holistic strategies. In addition to Pingyao, Yangzhou has invested heavily in improving living conditions while preserving the historic urban fabric.⁹⁶

⁹³ The Sherlock Holmes Museum official website, <https://www.sherlock-holmes.co.uk>.

⁹⁴ Congress on the European Architectural Heritage, *Declaration of Amsterdam* (Amsterdam: Congress on the European Architectural Heritage, 1975), https://civvihi.comos.org/wp-content/uploads/2022/03/Declaration-of-Amsterdam_25_10_1975.pdf.

⁹⁵ City of Tallinn, “Tallinn’s Old Town development plan 2025–2035 opens for public discussion,” Tallinn.ee, January 27, 2025, <https://www.tallinn.ee/en/news/tallinns-old-town-development-plan-2025-2035-opens-public-discussion>.

⁹⁶ Xinpeng Li, Wei Hou, Meng Liu and Zhenlin Yu, “Traditional Thoughts and Modern Development of the Historical Urban Landscape in China: Lessons Learned from the Example of Pingyao Historical City,” in *Land*, 11(2) (2022), DOI: <https://doi.org/10.3390/land11020247>.

During the 2010s, China launched national programs for “Historic-Cultural Villages” and “Traditional Villages,” aimed at directing funds and conservation plans toward rural heritage sites that remain inhabited. These initiatives acknowledge the importance of sustainability and social values: maintaining resident populations and improving living standards are essential for preserving vernacular heritage, which tends to deteriorate when depopulated. Yet these programs remain centralized: the state selects villages, sets design templates, and produces guidelines—local communities implement rather than lead.⁹⁷

Cultural landscapes in Europe and China reveal further contrasts. In Europe, landscapes such as vineyard regions or pastoral settings enjoy strong legal protections and are governed by stakeholder committees comprising farmers, ecologists, and heritage specialists. The EU’s Common Agricultural Policy even provides direct payments to farmers who maintain traditional landscape features (hedgerows, stone terraces), effectively subsidizing heritage as environmental stewardship.⁹⁸

In China, cultural landscapes like the Hani Rice Terraces⁹⁹ received heavy investment in infrastructure and tourism. Authorities have also supported traditional agriculture through irrigation improvements and subsidies, recognizing that the landscape collapses if farming ceases. Tourism, however, is double-edged: it generates income but can lead younger residents to abandon farming for tourism employment. Officials respond through forms of “guided commodification,” turning some farmers into demonstrators for tourists or developing agrotourism experiences. The long-term sustainability of these approaches remains uncertain, but they illustrate efforts to integrate conservation of the tangible (landscape) with the intangible (agricultural knowledge) within centralized planning.¹⁰⁰

Importantly, the exchange of ideas in heritage theory is not one-directional. Global discourse increasingly draws on Asian practices, including those from China. The Chinese tradition of periodic reconstruction of timber structures has significantly shaped debates on authenticity, supporting the notion that “the spirit of place” may outweigh preservation of original material. ICOMOS charters now acknowledge that cyclical renewal is legitimate in some cultures, with the classic example being Japan’s Shikinen Sengu at the Ise Shrine.

⁹⁷ Mengyuan Zhou, Songfeng Chu and Xiaofan Du, “Safeguarding Traditional Villages in China: The Role and Challenges of Rural Heritage Preservation,” in *Built Heritage* 3(2) (2019): 81-93.

⁹⁸ European Commission, *The common agricultural policy at a glance*, https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-glance_en.

⁹⁹ UNESCO World Heritage Centre, *Cultural Landscape of Honghe Hani Rice Terraces*, inscribed on the *World Heritage List* in 2013, <https://whc.unesco.org/en/list/1111/>.

¹⁰⁰ Xu, “Sustaining the Hani Terraces”.

This broadened the international doctrine beyond a Eurocentric material focus toward more culturally diverse understandings.¹⁰¹

China's engagement with international frameworks is evident in the proliferation of translated charters and guidelines, university curricula, and joint international projects. Many Chinese heritage professionals receive academic training overseas and reintroduce concepts such as community involvement and value assessment, which gradually diffuse into domestic practice.

Europe, meanwhile, is increasingly attentive to heritage's role in intercultural dialogue and post-colonial reconciliation. These themes resonate with China's management of the heritage of its 56 officially recognized minority groups. Both contexts grapple with incorporating minority narratives—Europe with migrant and post-colonial communities, China with groups such as Tibetans and Uyghurs whose cultural expressions may diverge from the national narrative. In Europe, prevailing policy encourages these communities to articulate their own heritage (e.g., recognition of Islamic heritage in Spain and Bosnia).¹⁰² In China, minority heritage is often celebrated but framed as part of the “great tapestry of the Chinese nation,” sometimes smoothing over cultural differences or political aspirations.¹⁰³

Once again, political context shapes how theoretical frameworks are applied: value-based and participatory approaches inevitably carry political implications.

Broadly, Europe appears to be moving toward a model of pluralist stewardship—a combination of top-down policies and bottom-up initiatives integrating sustainability, community values, and narrative plurality, supported by strong civil society. China follows a model of state-guided strategy—selectively adopting international best practices, especially technical and planning tools, when aligned with national objectives, while retaining narrative control and limiting participation. Heritage is also heavily leveraged for economic development and soft power.

Both contexts show that heritage management is dynamic and must respond to contemporary pressures—climate change, rapid urbanization, mass tourism, and social movements for justice. Accordingly, theoretical frameworks continue to evolve: Europe leans toward participation and inclusivity (including museum decolonization), while China increasingly experiments with integrating

¹⁰¹ Songfeng Jing, Wei Wang and Takeshi Masui, “Analysis for Conservation of the Timber-Framed Architectural Heritage in China and Japan from the Viewpoint of Authenticity,” in *Sustainability*, 15(2) (2023), DOI: <https://doi.org/10.3390/su15021384>.

¹⁰² European Heritage Awards/Europa Nostra, *IS-LE: Islamic Legacy, pan-European project coordinated in SPAIN*, <https://www.europeanheritageawards.eu/winners/is-le-islamic-legacy-pan-european-project-coordinated-in-spain>.

¹⁰³ Juheon Lee, “Promoting Majority Culture and Excluding External Ethnic Influences: China's Strategy for the UNESCO ‘Intangible’ Cultural Heritage List,” *Social Identities: Journal for the Study of Race, Nation and Culture* 21, no. 5 (2015): 474–489.

heritage into regional and urban planning, where new cities often incorporate museums and heritage-themed parks.

Conclusion

This analysis has shown that contemporary heritage theory and practice constitute a highly complex field situated at the intersection of science, politics, economics, and ethics. The theoretical frameworks examined (Authorized Heritage Discourse, Values-Based Heritage Management, Sustainable Heritage Management, Cultural Landscape Theory, and Heritage Tourism Theory) offer complementary perspectives on how societies define, protect, and mobilize cultural heritage. Each paradigm not only interprets heritage processes but also shapes them according to specific values, ideologies, and socio-political conditions.

In the twenty-first century, heritage can no longer be understood as a static assemblage of monuments and artefacts. Rather, it functions as a living system of relationships among people, places, memories, and identities. This paradigmatic shift (from materiality to meaning, and from expert authority to participatory governance) is evident in the transition from AHD to VBHM. While AHD dominated the modern era with its elitist, nationalist, expert-centered orientation, newer approaches emphasize democratization and pluralism. In a world shaped by globalization, mobility, and cultural diversity, heritage becomes less an emblem of national identity and more a space for negotiating values.

The values-based model marks a key moment in the intellectual maturation of the field. It introduces a participatory and reflexive process through which communities, experts, and authorities work together to determine what is significant and why. In Romania (a context shaped by a long-standing tradition of centralized, bureaucratic monument protection) adopting such a model could revitalize the relationship between heritage and society. Cases such as Roșia Montană, the wooden villages of Maramureș, or the Danube Delta illustrate the need for a management framework able to balance cultural, social, economic, and ecological values.

Sustainability adds another integrative dimension by linking heritage to broader goals of sustainable development. Heritage is not merely a legacy of the past but also a resource for the future: a source of identity, education, social cohesion, and economic vitality. SHM represents a synthesis between VBHM and contemporary governance strategies, seeking equilibrium between conservation, use, and intergenerational transmission. The Mogao Grottoes in China exemplify this paradigm, demonstrating science-based, value-driven, and sustainability-oriented management under intense economic and tourism pressures.

The comparison between Europe and China highlights how heritage theories adapt to different political and cultural systems. Europe has increasingly

moved from centralized control toward participatory governance, with civil society, NGOs, and local communities playing expanding roles. Documents such as the Faro Convention and European initiatives around “heritage rights” reflect a vision in which heritage contributes to democratic development and social inclusion.

By contrast, China represents a selective adaptation of international theories to an authoritarian context. Heritage is mobilized both as an economic resource and an ideological instrument, reinforcing state narratives and national identity. Although recent initiatives incorporate ideas of community participation, sustainability, and cultural landscapes, these are generally implemented top-down. At the same time, the Chinese model shows how a strong state can mobilize substantial resources for conservation, and international collaboration can yield exemplary outcomes, as demonstrated at Dunhuang.

Both models offer valuable lessons for Romania. From Europe, Romania can draw on principles of transparency, public participation, and the appreciation of vernacular heritage. From China, it can learn how to strategically integrate heritage into economic and urban development. Romania occupies an intermediate position between these paradigms, combining European legal-institutional frameworks with administrative cultures shaped by centralization. As such, the adaptation of international theoretical models must be critical, context-sensitive, and attentive to local political, economic, and cultural realities.

Practically, Romanian heritage management should prioritize three directions. First, strengthening participatory frameworks by establishing genuine mechanisms for community involvement in decision-making. Second, integrating sustainability principles into all public policies related to heritage—from urban planning and tourism to education and environmental protection. Third, expanding digitalization and innovation to improve access, documentation, and heritage education in line with successful international models.

At the theoretical level, the study underscores the need for an interdisciplinary approach. Heritage cannot be understood solely through art history or architecture; it must be analyzed in relation to sociology, anthropology, economics, law, and environmental sciences. This holistic perspective aligns with contemporary global trends, which increasingly conceptualize heritage as a socio-ecological system. Cultural landscape theory and the recognition of intangible heritage reinforce this orientation, highlighting how the identity of places emerges from ongoing interactions between people and their environments, and between material and immaterial dimensions.

Education represents another essential element. Without robust heritage education, theories and policies remain abstract. Romania would benefit from a national strategy that promotes cultural literacy, youth engagement, and interdisciplinary professional training. European examples (such as volunteer

programs at World Heritage Sites or school–museum partnerships) offer adaptable models.

In conclusion, cultural heritage is not merely something to be preserved but a strategic resource to be continually reinterpreted and developed. Whether material or intangible, European or Asian, rural or urban, heritage requires a balance between conservation and transformation, between past and future. The theories examined here demonstrate that there is no universal model but rather a constellation of principles adaptable to diverse contexts. Ultimately, the challenge is to ensure that heritage retains a meaningful, dynamic role—one that unites, inspires, and contributes to sustainable and equitable development.

Heritage, in all its forms, remains a vital expression of humanity's diversity. In an era marked by globalization and multidimensional crises (climatic, identity-based, moral) it can serve as an anchor, a symbolic reference point, and a platform for dialogue. The heritage professional's role, therefore, is to mediate between past and present, between scientific knowledge and community needs, between memory and the demands of the future.



Fig. 1. The Mogao Caves in Dunhuang, China – a complex of 492 rock-cut Buddhist cave temples dating from the 4th to the 14th century. The site is managed by the Dunhuang Academy in cooperation with international partners. Conservation measures include visitor caps, continuous environmental monitoring, and extensive digital documentation. Mogao is frequently cited as a model of best practice in balancing heritage conservation with public access and tourism (Photo source: author's archive).

