

## Introduction: The state and historic buildings: preserving 'the national past'

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## **The state and historic buildings: preserving ‘the national past’**

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### **Abstract**

Historic buildings are important in nationalism through their roles in building and reinforcing national identity. As part of the expanding ‘heritage industry’, they are also of growing economic and political importance. Despite their physical existence, historic buildings are ‘created’- they must be constructed as ‘historic’ through processes of choice and the attachment of significance. The state can perform these functions through policies that define and select buildings for protection, by ownership and funding, and by its uses of buildings for nationalistic purposes. Yet state actors can have good reasons- nationalistic and economic- to destroy or fail to preserve historic buildings. The paper examines why, when and how state actors pursue policies to protect historic buildings. It offers arguments about patterns of state action that part of state strategies to promote national identity and cultural nationalism.

**Key words:** historic buildings; heritage; preservation; cultural nationalism; state

Each nation has its ‘historic buildings’ that represent its past. Some are grand and prestigious- castles, palaces, temples of religion, great walls, country houses- but others are the ordinary dwellings of great figures, examples of vernacular ‘national architecture styles’, public amenities, torture cells and concentration camps. They attract strong emotional attachment, as campaigns to ‘save the nation’s heritage’ reveal. Historic buildings are directly linked to nationalism, through their roles in building and reinforcing national identity.

Despite their physical existence, historic buildings are ‘created’ rather than given: they must be constructed as ‘historic’, through processes of choice and the attachment of significance. They are not just old buildings- many long-standing edifices have been regarded as of little historic interest, while conversely, modern buildings can quickly be regarded as ‘historic’, as the Centre Pompidou in Paris or recently-constructed skyscrapers in New York, London or Dubai illustrate.

‘The state’ can undertake key functions in the creation and preservation of historic buildings. State actors define and select buildings for protection, leaving others available for demolition or modification. They own or fund certain historic buildings. Equally, they influence the use of such buildings for nationalistic purposes, playing a central role in the attachment of ‘national significance’ to particular buildings, picking out or inventing certain pasts while downplaying others.

The role of the state in producing cultural nationalism and specifically ‘heritage’ has been highlighted in recent studies. Yet the relationships between state action and cultural nationalism need to be investigated rather than assumed. State actors can have good reasons- nationalistic and economic- to destroy or fail to preserve ‘national’ buildings. Conceptions of ‘national historic importance’ can differ, as can which state actors are involved, their instruments and strategies. Finally, not all preservation is driven by nationalistic aims or led

by the state. Hence recognising the importance of state action is a first step but needs to be followed by specific claims about its nature and occurrence.

To analyse state preservation policies and politics, the special themed section treats the state as an active set of actors with interests, strategies, conceptions and instruments. It examines why, when and how state actors pursue policies to protect historic buildings. It has a dual purpose: to examine an important case of the creation of cultural nationalism and heritage; to offer wider implications for understanding the role of the state in cultural nationalism.

Our central finding is that state action to protect historic buildings through legal regulation has grown as part of state strategies to promote national identity and cultural nationalism, but that there has been no linear or uniform pattern. Instead, moments of reduced protection or indeed destruction of buildings have occurred as well as extension of protection. There have been substantial contrasts in the timing of state action, both chronologically and relative to the formation of modern nation states. State strategies range from seeking to use historic buildings to promote national unity to pursuing a particular form of national identity at the expense of certain groups. State actors and instruments have differed and evolved, with some countries relying on legal regulation by the national government whereas others have left policies to subnational levels or drawn on groups such as the Church or aristocracy. In recent years, states have turned to international regulation through UNESCO and have increasingly combined aims of creating national identity with economic objectives. The flexibility of historic buildings- a paradox given their physical existence- allows policy makers to select and adapt them as part of current political strategies and struggles.

Using the cases, we identify four factors that influence the role of the state and formulate hypotheses about their effects. The most visible is regime change: this is usually followed by debates about preserving prominent existing buildings and then often increased protection. Second, institutional inheritance is important: when a nation state or a new regime is established, existing legislation and organisations that support preservation can be continued, defended and indeed extended. Third, relationships between the current regime and non-state actors influences whether the state relies on these actors or seeks to control preservation itself directly. Finally, external and internal threats often lead state actors to use historic buildings protection for nationalistic purposes.

We take a comparative-historical approach. Contributors examine the evolution of the state's role in European countries (Britain, France, Italy and Russia), a non-European one (India) as and UNESCO, the most important international body in the field. Moreover, the section offers a cross-disciplinary analysis, with scholars from political science, history and law, since both the study of nationalism and the specific topic of state policies for historic buildings span several disciplines.

This introductory essay starts with a discussion of the state and historic buildings in relation to literatures on cultural nationalism and heritage. It then sets out our key findings before returning to broader implications for debates about the state and cultural nationalism.

## **I Historic buildings and wider debates about the state and cultural nationalism and heritage**

Preservation of historic buildings relates strongly to cultural nationalism, which John Hutchinson defines as ‘movements to create national communities’ (Hutchinson 2013: 75-76). Historic buildings can play crucial roles in forming and sustaining a national community, which John Hutchinson argues is based on ‘historical memory’ (Hutchinson 1987: 9). They offer symbols, places of commemoration, examples of ‘national styles of architecture’ or ‘national recreations’ (Smith 1991, esp. ch 4). They can be preserved as part of the development of national ‘myths’, community and identity (Smith 1999, Anderson 2006, Thiesse 1999), the ‘invention of traditions’ (Hobsbawm and Ranger 1983) or the provision sites of ‘memory’ (Nora 1984-1992). They can contribute to ‘banal nationalism’ that operates through ‘taken for granted’ norms and assumptions (cf. Billig 1995, Martigny 2008). They can support ‘national histories’ (Berger and Conrad 2015), house ‘national art’ that provides visual representations of the nation and its past (cf. Smith 2013) and support national artistic movements (Thiesse 2013). These forms of cultural nationalism are created- sometimes in the sense of their actual production but always in the sense of ‘national importance’ being ascribed to them.

The links between historic buildings and nationalism are also underlined in a second major relevant literature, that on ‘heritage’. David Lowenthal defines heritage as ‘the celebration of the past for present purposes’, but a past ‘in danger’ that therefore needs protection (Lowenthal 1998; Wright 2009). Lowenthal argues that heritage has ‘exploded’ in recent decades in the West leading to a ‘heritage obsession’ (Cowell 2008). Indeed, a concern for heritage has spread across many different kinds of country- industrialised, developing and colonial, in many different areas of the world.<sup>1</sup> Through processes of ‘heritization’, certain objects and practices are included as ‘heritage’, whilst others are excluded (Smith 2006, Harrison 2013). Historic buildings such as country houses are a prominent example, whose importance is testified by visits or by the popularity of programmes such as ‘Downton Abbey’, about life in an English country house in the early twentieth century, which became one of the most watched television series in countries around the world. Heritization can perform important political functions in terms of moulding citizens’ understanding of a national identity or others’ perceptions of a country’s national identity.

A central debate for the cultural nationalism literature concerns the role of the state and political nationalism. Several major scholars of cultural nationalism (eg Leerssen 2006, Hutchinson 1987, 1994, 2013) underline that cultural nationalism is not subordinate to political nationalism: it can operate before the latter and indeed continue after a nation-state has been formed. They emphasise the emotional components of nationalism, which cannot be reduced to the legal existence of a nation state nor to individual rational calculations about costs and benefits but is based on feelings of belonging, loyalty and identity (cf. Smith 2010). They also point to the role of non-state actors, who may contribute to maintaining or creating a national identity with or without such a state.<sup>2</sup>

Within work on heritage, the role of the state is also a matter of controversy. Traditional studies have often emphasised a ‘canon’ based on ‘beauty’, ‘artistic importance’ and ‘historic significance’ and defined by ‘professionals’, notably art historians and architects. In reaction, ‘critical heritage’ studies underline the power of official national or international bodies such as UNESCO, by producing an ‘authorised heritage discourse’ (Smith 2006), which privileges certain forms of heritage over others (for instance, country houses) and selects certain parts of buildings for attention, whilst ignoring others (for example, the owners’ family history rather than that of servants). Such discourse can play a role in contemporary politics- for example, Patrick Wright (1985) and Robert Hewison (1987) argued that, the ‘heritage

industry' in Britain during the 1980s offered nostalgia for the past that redirected attention away from contemporary politics and served the interests of the Conservative Party.

Such debates on the role of the state are valuable in underlining that the creation of 'historic' buildings form part of political processes and struggles. Yet they remain too limited and their claims are often somewhat undifferentiated. Sometimes the state engages in preservation of historic buildings, but it can also engage in their destruction for nationalistic purposes, as graphically witnessed in the former Yugoslavia- when applied to cities, termed 'urbicide' (Coward 2008). Nor is there necessarily one 'national identity' or cultural nationalism- several identities for forms of nationalism may compete or co-exist (cf. Thiesse 1999). Moreover, the state may not be the only actor in promoting cultural nationalism through preservation of historic buildings- non-state actors from private individuals such as owners, art historians, architects or writers to major institutions such as the Church or non-profit organisations and cultural groups can be can be vital participants. These non-state actors may influence protection independently of state support or even counter to the established state 'authorised heritage discourse'.

In addition, preservation of historic buildings can be driven by non-nationalistic aims. State policies to preserve historic buildings can be chosen to support the growth of tourism, aid 'urban regeneration' and 'the heritage industry'- indeed, smuch of the 'heritization' described by Hewison or Wright was about commercialisation rather than nationalism as such and was driven by private actors as well as public ones. Equally, state policies can be driven by bureaucratic motivations, as officials expand their responsibilities or pursue their view of 'the public good', such as promoting education and 'culture' or protecting 'beauty'. Similar non-nationalistic objectives may lie behind the activities of non-state actors.

One way of developing analyses of state action is to treat it an actor, or indeed a set of actors, with their own aims, interests and rhetoric. The state is central to modern nationalism (cf. Breuilly 1996) and as Martigny (2008) argues in the case of France, can produce and use cultural nationalism as part of its strategies. Indeed, for historic buildings, the state can engage in all three activities that Leerssen (2006) has delineated in his study of nineteenth century 'cultivation' of cultural nationalism: inventory and 'salvage', by deciding which buildings should be saved from destruction or alteration; 'production', by (re)discovering the 'significance' of certain parts of buildings and using them to promote 'the' national identity, or indeed by inventing significance through myths about the building that have little or no factual foundation; 'propagandist proclamation' by disseminating information about the place of a building in the nation's development.

Hence there are important questions about the conditions under which state bodies preserve historic buildings and use them for nationalistic purposes, their relationships with non-state actors, and then the nature of the state's role. We seek to offer some specific claims and hypotheses about state action. We begin by trying to delineate the field and situate our work. Combining the issues of whether nationalist policies are led by state or non-state actors and then whether they are motivated by nationalistic aims or not, we can offer a 'map' of preservation policies for historic buildings. Each can be seen as variables- whether led more or less by state actors, and whether more or less dominated by nationalistic or other aims.

Figure 1 Mapping actors and their objectives in historic building preservation



In Quadrant 1, state actors dominate the leadership of preservation policies in pursuit of mostly nationalistic objectives. This corresponds to Martigny's discussion of the state pursuing cultural nationalism. In Quadrant 2, preservation is also used to build national identity but is led more by societal actors, offering an example of cultural nationalism 'from below'. This quadrant underlines that cultural nationalism can be independent of the state. Quadrant 3 incorporates the possibility that state preservation policies can be driven by objectives other than reinforcing nationalism directly- for instance, for economic growth or developing culture. Quadrant 4 covers historic building preservation being undertaken by non-state actors for non-nationalistic aims. The grid is of course a simplification, but it offers an initial heuristic device for mapping different forms of preservation policy.

Our focus is on quadrant 1- the state and its nationalistic purposes. To offer more precise claims and explanations about state policies, it is also important to treat the state as an active actor, with its own goals, strategies and interests. At the same time, we do not treat 'the state' as a homogeneous unit, nor the sole actor in preservation policies, nor always motivated by nationalistic aims.

We therefore address three sets of issues. The first centres on why states seek to protect historic buildings. Here we look at the strategies of specific state actors and the uses they have sought to make of such buildings. This relates to the nature of the nationalism being pursued - what conception of 'the nation' do state actors promote and what nationalistic uses do they make of historic buildings- for instance, to deal with certain threats or multiple identities, or to reinforce certain political and social groups. Here the division or relationship between nationalistic and non-nationalistic aims of policy can be analysed- i.e. quadrants 1 and 3 in figure 1.

A second set of issues concern when state preservation policies arise in time and place. 'When' has a chronological sense but also one relative to other quadrants- for instance, does state action precede or follow action by non-state actors and does it precede or follow political regime changes and state building? These questions relate to wider debates about the

relationship between cultural and political nationalism, and hence the division between quadrants 1 and 2 or 4.

Our third set of questions concern which state actors are involved in preservation policies and which instruments they use. This allows examination of how the state acts and the content of national identity that state actors may seek to promote through historic buildings.

This introductory essay discusses some of our responses to these three sets of questions drawing on cases that cover different polities over significant time periods. We focus on existing buildings but not the erection of new monuments, since buildings become ‘historic’ over time. ‘The state’ is not taken as a unified organisation- instead we look at more specific state actors, not just central government but also subnational governments, and within these, elected and unelected officials, the monarchy, courts and public agencies; whether some other groups such as the Church or aristocracy form part of the state is also open to discussion in some cases. We focus on state policy making by elite policy makers- for reasons of space, we cannot examine in detail other groups. Finally, we use ‘nationalism’ without normative significance and the terms ‘preservation’ and ‘protection’ synonymously.

## **Section II The strategies of state actors in using historic buildings**

Why have ‘modern’ states decided to protect historic buildings?<sup>3</sup> At first sight, the obvious answer might be, ‘because of their power to promote the nation’. Yet responses are not to be taken for granted. For a start, historic buildings often belong to previous and opposing regimes or a colonial past, and symbolise past subjugation. Indeed revolutions have frequently been followed by attempts to destroy the major buildings of the past, as seen in France after 1789, Russia after 1917 and China in the Cultural Revolution. Buildings may belong to internal opponents of the current state, such as religious groups- for instance, the Church in France during the 19<sup>th</sup> century and Russia after 1917 or Muslims in India in the face of Hindu nationalism in the 1990s (Thatcher, Kelly and Sengupta, this volume). Although we may label the destruction of past buildings ‘vandalism’, it remains a powerful force today- witness the publicly proclaimed destruction of ancient buildings in Afghanistan, Iraq, Timbuktu or Syria.

In addition, preservation of historic buildings has economic costs. The most obvious are those of maintenance and repair, but perhaps the largest are the opportunity costs in terms of erecting new buildings. The greatest destruction of long-standing buildings has come with industrialisation and urban expansion, with the demolition of major edifices in cities such as London (cf. Hobhouse 1971, Davies 2009) or Florence (its historic city walls and whole quarters of mediaeval buildings were demolished in the nineteenth century), or large parts of Chinese cities through urban redevelopment in the past thirty years. Moreover, destruction can allow creation- many of today’s historic buildings are in fact on the sites of earlier ones, knocked down to allow their creation.

Thus why states seek to preserve historic buildings calls for analysis. The strategies of state actors in deciding to protect historic buildings and the choices and uses they have sought to make of such buildings offer valuable evidence for such a task.

One major strategy has been to appropriate selected glorified pasts to legitimate the current nation state. Often the current regime seeks to create a direct lineage or appropriate the buildings of past regimes, and present themselves as the rightful heirs of ‘national’ triumphs. This seems particularly true of new and revolutionary regimes. In Marx’s colourful language about the 1852 French coup by Napoleon III, “precisely in such epochs of revolutionary crisis [men] anxiously conjure up the spirits of the past to their service, borrowing from them names, battle slogans, and costumes in order to present this new scene in world history in time-honored disguise and borrowed language.”<sup>4</sup> In France, it is remarkable that changes of regime in 1789, 1830, 1870, 1940 and 1958 were all rapidly followed by policies to protect historic buildings in the name of ‘the nation’, as new rulers took over and used buildings from past regimes while Mussolini sought to link his regime to ancient Rome through preservation of buildings such as the excavated ancient Fora in Rome (whilst destroying much of medieval Rome) (Thatcher this volume).

Linkage to past glories is often connected to using historic buildings as national rallying symbols in the face of external threats. Wars and invasions have seen remarkable changes in policy, as historic buildings of the previous opposed regimes or internal groups become adopted. Russia and China offer good examples, as both switched from rhetoric based on class to one of the ‘national’ value of heritage (Smith 2015). Thus for example, having knocked down many churches, the Stalinist regime in the late 1930s ‘appropriated’ many remaining ones to the Russian nation, along with the former Tsarist palaces (despite their being designed by non-Russian architects) and presented them as symbols of the nation’s resistance to foreign threats (Kelly this volume). Since at least the late eighteenth century, the French state has used historic buildings as symbols of power or French nationalism during or following wars.

External ‘threats’ may extend to cross-national competition, as countries seek to maintain national identity, values and prestige. In late nineteenth and early twentieth centuries, policy makers in Europe sought to ‘keep up’ with each other and Italy, France and Britain (for itself and colonial India) all passed legislation at very similar times (notably 1902-1913), although the content differed (cf. Swenson 2013). The Soviet and post-Soviet state has sought to select certain histories to support certain policies, sometimes even returning to pre-1917 names, with Saint Petersburg being the best-known example (see Kelly 2014). The remarkable attention given to the preservation of country houses in the UK from the 1980s onwards may be linked to the loss of empire and debates about Britain’s decline (cf. Hewison 1987, Wright 2009). Indeed, as fears increase about migration, loss of ‘traditional values’ or the rise of new international powers and movements, so too do policies that promote past national glories as well as rhetoric about ‘national identity’.

However at times, historic buildings have served the opposite purpose, namely showing breaks with the past. This is particularly true for ‘dark heritage’, which is preserved to illustrate a negative past from which the current regime has broken. Hence for instance, preservation of concentration camps, the Nuremberg Rally grounds can legitimate the current German state by showing rupture from its Nazi forebears (cf. Macdonald 2009). At the same time, policy makers can be highly selective about what constitutes ‘dark’ heritage - for example, in post-unification Germany, pre-1914 buildings have been rebuilt as they were before destruction in the Second World War (eg. the reconstruction of the Berlin City Palace or the Marienkirche church in Dresden). Such a combination allows the current German state to link itself to the pre-1914 world but separate itself from the Nazi period.



State actors often seek to promote a particular form of national identity through historic buildings to deal with domestic conflicts. They may seek to use them as part of political strategies to bind diverse groups into ‘the nation’. Thus before independence, the British used historic buildings preservation in India as part of a strategy to hold the many groups in the country together and to ‘educate’ its citizens, while French central government used historic buildings to promote the idea of a single ‘national’ identity and was highly suspicious of ‘localism’ (Sengupta this volume and 2015, Thatcher this volume). Conversely on some occasions, allowing subnational discretion has formed part of policies of seeking to reconcile a nation state with diversity. In Germany, local powers over historic building policy arises from the history of unification of different long-standing states, while similarly, the Soviet Union in the 1960s and 1970s allowed states and groups to promote their own traditions as part of keeping support for the federation (Kelly this volume). Finally, policy makers can use selective preservation to favour certain ethnic or religious groups and discriminate against others. In India, Hindu buildings were preserved from the 1990s onwards whereas Muslim ones were not, as part of a Hindu nationalism (Sengupta, this volume).

The rise of international regulation of historic buildings might seem to signal a reduction of state promotion of nationalistic identity. When UNESCO includes a building on its World Heritage list, a UNESCO committee monitors preservation and can put the building on the ‘endangered’ list or ultimately remove it from the list; both would be humiliating for a nation, and UNESCO’s regulation represents a loss of control and indeed sovereignty. Yet analysis of UNESCO also reveals that states seek new modes of pursuing their nationalist aims through international regulation (Casini, this volume). Buildings for the World Heritage List can only be proposed by recognised signatory states, who can select those that serve their purposes. International recognition can boost national identity and pride, and strengthen the government’s view of national identity, albeit at the cost of reduced national sovereignty.

However, state policy makers have sometimes twined aims of strengthening ‘national identity’ with other objectives. These may be bureaucratisation and administrative expansion. The establishment of ministries or administrative units and the professionalization of their staff have contributed to the expansion of historic building protection- for instance, Simon Thurley (2013) has argued that the British Ministry of Works and its successor organisations pressed forward preservation, while Arlette Auduc (2008) has shown how the Ministère des Beaux Arts was important in drafting legislation in the late nineteenth and early twentieth centuries. They spoke in the name of the nation, but were also expanding their powers and resources. Other objectives may be more economic, with the development of a ‘heritage industry’ and a large tourist industry (for Britain, see Wright 2009, Hewison 1987). One of the reasons why national governments welcome UNESCO world heritage site status is to increase visitors, even though it means supra-national regulation (Lorenzo Casini this volume). Today historic buildings form part of wider strategies of urban renewal, as even former industrial cities are transformed into cultural and tourist attractions.

While there are both directly nationalistic reasons for state policies to preserve historic building and other aims, the key point is the flexibility in the uses of such buildings despite, or perhaps because of, their physical existence. Buildings from previous regimes can be appropriated as symbols by new ones, while certain ‘dark heritage’ can be selected to show progress. Religious buildings can become objects of national pride for lay states or even Communist regimes such as the Soviet Union or China (Smith 2015). Buildings with local links can become part of strategies to bind nations or federations together. UNESCO

recognition and regulation boost national prestige. Preservation that serves bureaucratic, professional and economic interests can be combined with promotion of a national identity.

### **III The timing of state preservation policies**

State policies to preserve historic buildings have seen a progressive extension over the past two centuries.<sup>5</sup> The most striking feature is the growth of legal restrictions. These were rare before the nineteenth century, but starting with France after the 1789 Revolution, were introduced in other countries such as Britain, Germany and Russia (Thatcher, Swenson, Kelly this volume; Swenson 2013; Baldwin Brown 1905 Koshar 1998). But before 1900, legislation was usually limited in terms of numbers of buildings and scope.<sup>6</sup>

Over the twentieth century, legislation greatly extended protection. It was widened to cover privately-owned buildings, which in most countries constitute the vast majority of historic buildings. Italy and France passed major legislation in 1909 and 1913, Russia adopted policies of protecting certain historic buildings in the 1930s and 1940s, and Britain passed laws in 1913, 1944 and 1947 (Thatcher, Swenson and Kelly this volume). Nor has protection remained confined to Western states. India saw important colonial legislation in 1904, which has been maintained and extended after independence (Sengupta 2015 and this volume. International regulation has expanded- 161 states have ratified the 1972 UNESCO World Heritage Convention and UNESCO now regulates more than a thousand ‘world heritage sites’ (Casini this volume).<sup>7</sup> Protection has been broadened from buildings that underline previous national achievements to include ‘dark heritage’ such as concentration camps, rallying grounds or torture cells. It covers not only individual ‘historic monuments’, but also whole conservation areas or ‘zones’, often being integrated into urban planning. The extent of protection can be remarkable- far-reaching and detailed restrictions can cover exteriors, interiors and uses, as well as entire areas close to a historic building.

But the expansion of state protection has not been linear nor always part of creating a ‘modern’ national identity. Changes of political regime have sometimes been followed by active policies of destruction. This was not only seen in France after 1789, but also in Russia, where preservation of old buildings was often associated with ‘anti-Soviet’ attitudes during the 1920s and 1930s (Kelly, this volume). Equally, after the fall of the Soviet Union, urban redevelopment meant largescale destruction of historic buildings, while in China, buildings were destroyed during the Cultural Revolution and then since the 1990s, modern buildings have replaced old ones or even entire historic centres in cities (Smith 2015). In India, a severe weakening of attempts at religious neutrality after the 1990s has limited protection of certain historic sites such as Muslim mosques (Sengupta, this volume).

Equally, the timing of preservation policies has varied, both chronologically and relative to state building. In one group of countries, protection preceded the modern state. Hence the Papacy and other pre-unity Italian states established legislation from the 15<sup>th</sup> century onwards, which was maintained and extended when Italy became a nation state after 1861.<sup>8</sup> Thus despite being a recent nation state and classed as having a ‘weak’ state, Italy saw early and extensive legal protection (Thatcher this volume). Similarly, legislation and bureaucratic organisations and procedures in India preceded independence. The influence of inheritance is perhaps clearest in India, where the Archaeological Survey of India for many decades continued the policies of the colonial archaeological service and its legislation (Indra

Sengupta this volume). Yet new Indian state kept these non-nationalistic (or even anti-nationalistic) measures but appropriated them to a purpose of creating a 'Hindu' Indian national identity (Sengupta this volume).

In a second group of nations, new political regimes have created or strengthened protection soon after been established as part of strategies to build or safeguard the nation state. France saw legislation after the 1789 Revolution, further extensions soon after the 1830 Revolution, and then more legislation in 1883 after the start of the Third Republic, while the creation of the Fifth Republic in 1958 too was quickly followed by the establishment of a new Ministry of Culture and extensive legislation. Russia saw protection after the Bolshevik revolution of 1917, with legislation in 1918, 1924, 1935 and 1947-1948, although preservation was highly contested in the 1920s and 1930 and only became securely ensconced in official policy after the "Great Patriotic War" (1941-1945). In China, protection waxed and waned after the 1949 revolution, depending on whether the Communist party has sought to promote class or nation (Smith 2015).

However, the relationships between protection and state building can be very different. A third pattern is that the state was built well before extensive legal protection. Britain offers a case, as state action grew from the late nineteenth century, in ways that paralleled that in other countries (Astrid Swenson this volume). However, significant legal restrictions on private owners came much later than in other Western European countries, notably through planning laws in 1944 and 1947. Relatedly, a very different relationship between state and non-state action to that in other countries has occurred. After a protection movement in the 1870s and 1880s largely led by artists and intellectuals (eg William Morris, John Ruskin, Edward Burne-Jones and William Holman Hunt), who enjoyed limited political influence, the National Trust, was created in 1895, as a voluntary organisation.

The cases indicate that the general trend of the expansion of legal protection over time and especially in the twentieth century co-exists with complex relationships with state building. Regime change and the formation of new nation states have been followed by extensions of protection, but are not a necessary condition for such growth. Where they have been absent, direct state action has arrived more slowly but often in cooperation with non-state actors that are themselves closely linked to the state.

#### **IV State action and actors**

A third set of questions concern the nature of state action. Which state actors participate in decision making? What are the forms and extents of state protection of historic buildings? Answers to these provide important evidence about the relationships between state protection of historic buildings and national identity.

Within the state, the allocation of powers and responsibilities for historic buildings has evolved in ways that suggest changing conceptions of the state's role in building and promoting 'national identity'. In the nineteenth century and first half of the twentieth century, legal powers were in the hands of important general ministries responsible for building a 'civic identity' such as the Interior, Education or Public Works. Very senior members of the state could become personally involved, indicating the importance of the topic for nation building. One notable example came in France- almost immediately after 1830 Revolution,

the French Interior Minister Guizot wrote a memorandum on historic buildings to the new King, Louis Philippe.

But during the twentieth century, historic buildings protection has increasingly become part of ministries for culture and associated economic and social domains,<sup>9</sup> and, at the international level, UNESCO has become a key actor as part of the globalisation of cultural property law (Casini 2010). Although senior leaders still become personally involved in decision making- from Mitterrand in alterations in central Paris to campaigns to save ‘traditional’ architecture by Prince Charles- there has been a professionalization of preservation within government as the roles of professional architects, art historians and conservationists has grown. These organisations and professionals often have a broader conception of national identity than that of the current political regime and have sought to include buildings that are ‘unpopular’ (with political leaders or the general public)- from churches in Russia in the 1920s to modern buildings or ‘dark heritage’ today (Kelly, this volume)

State action has often taken the form of legal regulation, notably of privately-owned buildings. Such regulation has been undertaken in the name of non-economic objectives rather than market efficiency. The wording and coverage of legislation indicate a broadening of conceptions of historic buildings and of national identity. Early legislation often referred to individual ‘historic monuments’ of ‘national importance’, usually defined by artistic or historic criteria. Protection was limited to buildings from specific time periods, often seen as times of great national achievement and/or ‘beauty’, such as pre-historic or Roman periods or the Renaissance. But later in the twentieth century the notion of ‘significance’ has often been used, which aids the protection of buildings that may be regarded as ‘ugly’ (often modern buildings). Thus for instance, ‘dark’ heritage of buildings used for shameful purposes are preserved such as concentration camps or the Nuremburg Rally building in Germany (cf. Macdonald 2009). In the UK, buildings are listed that are of “special architectural or historic interest”.<sup>10</sup> Hence even largely unknown ones can be designated as ‘historic’- to give a recent and striking example, in Britain, the Preston Bus Garage, a 1960s brutalist concrete building, was listed in 2014 due to being representative of a significant architectural style.<sup>11</sup> Moreover, new layers of protection have been added, covering the vicinity of a historic monument or entire ‘conservation areas’ or zones often through urban planning legislation.<sup>12</sup>

As a result of expansion, very large numbers of individual buildings are covered by legal regulation, plus whole areas or zones.<sup>13</sup> Buildings from all kinds of periods and of many different styles are preserved, from aristocratic to industrial or dark heritage. In comparison to legal regulation, state ownership and financing remain very limited.<sup>14</sup> Indeed, one of the main reasons for regulation of privately-owned buildings has been lack of public funding for purchase.

Alongside growth in legal regulation and professionalization of organisations and staff, there are important differences among countries, which underline the diverse uses of historic buildings in state strategies for building national identities and the lack of a single linear path. An important one concerns relations between state and non-state actors (ie quadrants 2 and 4 in Figure 1). Groups of cultural enthusiasts, local history societies and voluntary associations and individual ‘amateurs’, often aristocrats, art historians and literary figures have played key roles in creating public debate, shaping conceptions of preservation and provoking state action, often in the name of a ‘national past’, national identity and national pride. Sometimes this has been direct- for instance, campaigns by John Ruskin or James Lees-Milne, Cesare

Brandi or Alois Riegl. Sometimes it has been more indirect: in contrast to many policy sectors, intellectuals, literary figures and art historians have offered powerful impetus to debates about identity, memory and buildings. But the role and relative importance of non-state actors differs. In Britain, the National Trust has become a mass movement with over two million members and 350 properties, plus land and coastline, attracting over 21 million visitors per annum.<sup>15</sup> Its relationship with the British state has been one of close cooperation if not incorporation- for instance, the Trust was given legal recognition and privileges. In Germany, debates about how to ‘critically’ recall and present the nation’s Nazi past in the 1960s onwards were often led by non-state actors, such as civic associations and local volunteers, as well as art historians, who sought to underline Nazi atrocities whereas some state officials or ‘nationalists’ who wished to forget or downplay the Nazi past sought to demolish or alter the buildings (Kosher 1998, 2000). In contrast, in countries with legislation before state formation (eg Italy or India) or in which state action accompanied state formation (eg France, Russia or China), non-state actors have been treated with hostility and remain relatively small.

The criteria for protection and conceptions of ‘authenticity’ vary greatly across countries. This sheds light on current notions of ‘national significance’ and illustrates the adaptability of historic building protection. In some countries, attention is given to very old buildings. Hence the relevant service in India is the Archaeological Service (Sengupta this volume), while archaeology is also central in China (cf. Zan and Bonini 2012). In contrast, in Britain, after very limited regulation in the nineteenth century focused on archaeological sites, listing has been extended to modern buildings in recent years. Russia offers a fascinating case- literature is traditionally considered more important than architecture and hence monuments associated with writers are particularly prized (Kelly, this volume). In terms of the nature of preservation, in countries such as China, the form of a building is preserved, even if the physical materials are renewed regularly. Historic buildings can be adapted and reconstructed without losing their historical status. In European countries, there were vigorous debates in the nineteenth century between advocates of ‘restoring’ buildings as they were supposed to have been and those favouring maintenance of existing buildings, including modifications over the centuries or indeed simply as ‘ruins’ (Denslagen 1994; cf. Hell and Schönle 2010, Kosher 2000).<sup>16</sup> Current Western conceptions are more focused on keeping the ‘original’ materials, and renovation can require use of the original building techniques, thereby offering a building that appears fixed in the past.

Finally, the allocation of powers also varies considerably, offering valuable evidence about state policies and ‘national’ identity. In some countries, responsibility has lain with central government ministries and senior officials, suggesting their value in binding a single and indivisible nation together. Thus in France, central government has played an important role from the 1790s onwards, and even today the Prefects and central government architectural officials retain important powers (Thatcher this volume). In China, archaeological programmes on ‘Chinese history’ have been launched by the central government, but are part of wider administrative and political systems that also operate at the local level (Zan and Bonini Baraldi 2012). UNESCO decisions offer a fascinating mix of central government and supranational: only after recognised national government has nominated a site are decisions taken by supranational committees (Casini, this volume). However, in other countries, powers are decentralised, allowing much room for regional and local identities within or alongside a national one. Germany provides a particularly striking case, as from unification in the nineteenth century onwards, the *Länder* (regions) have their own legislation, while cities have much scope for choice. Finally, in some countries, responsibilities have been widely spread,

as historic buildings are used both to celebrate the past and bring economic benefits, with the private sector as a central actor. In England, the Conservative government created the Ministry of National Heritage in April 1992, which the Blair Labour government then merged into the new Ministry of Culture, Media and Sport from 1997 (cf. Thurley 2013, Delafons 1997, Swenson 2013). The titles used offer interesting insights into conceptions of heritage from the Conservatives' policies to promote 'the nation' through heritage to Labour's more 'popular' view of heritage and also linkages between heritage and media attention. Then in 2015, English Heritage, a government agency owning and managing state-owned heritage sites, was made financially free-standing- a form of privatisation that sees heritage as needing to prosper in economic markets.

Thus state regulation to protect historic buildings has greatly increased in terms of numbers and types of buildings covered, going hand in hand with greater professionalisation and the creation of specialised ministries. But these trends have been combined with considerable diversity across polities in relations with non-state actors, criteria for protection and the allocation of powers, as policy makers have adapted preservation to their specific circumstances.

## V Conclusion

The protection of historic buildings both offers a fascinating and important example of the state's roles in cultural nationalism and also provide a case to develop wider hypotheses about those roles.

Cross-national and cross-temporal comparisons suggest that the state policies for protecting historic buildings (quadrant 1 of figure 1) have grown dramatically since the nineteenth century, notably through legal regulation. State actors have pursued all three activities of 'cultivating cultural nationalism' (Leerssen 2006). They have engaged in the inventory and salvage of buildings- from UNESCO lists to ownership and rules that prohibit the destruction, modification or even repair or the development of buildings in the vicinity. They have 'produced' historic buildings by setting out criteria for protection and then selecting certain buildings as worthy of protection. They have undertaken propagation by using such buildings as part of wider political strategies of rallying support against external and internal threats.

Yet comparison across polities and time reveals much variation and cautions against any linear view of the state's role. The strategies of state actors have seen much diversity- for instance, whether seeking to use historic buildings to promote a single national identity and 'national unity' or to accept diversity or to engage in selective preservation that favours some groups against others. Equally, state strategies have varied from celebrating national histories to preserving dark heritage as a memory of the disasters of past nationalism. The timing of state action has varied greatly, both chronologically and with respect to nation state building. The scope and nature of preservation also have varied significantly over time and place, as have the allocation of state powers. Table 1 offers a summary of trends and then variations with some illustrative examples.

Table 1 Key findings- state policies towards Historic Buildings

	General trends	Variations across polity and time
Strategies of state actors	Build, mould or reinforce national identity	Create single national identity (France); accept subnational variations- Germany, Russia 1960s/70s; preserve dark heritage to underline break with past- Germany; selective preservation to favour certain groups- India from the 1980s
Timing	Limited legal regulation in nineteenth century, great expansion in twentieth century, especially after 1945	State protection accompanies modern nation state building and new regimes- eg France, Russia after 1917; preceded nation state- eg Italy, independent India; occurs well after modern nation state- eg Britain, UNESCO
Instruments and state actors	Expansion of legal regulation; increasing use of UNESCO; development of specialised ministries; expansion of role of professionals	Which periods covered and conceptions of 'authenticity'- allocation of powers- national or decentralised

What can our findings add to broader questions of the roles of the state in cultural nationalism? Thus far, literatures on cultural nationalism have underlined that it is separate and often autonomous from political nationalism. But recent studies have also pointed to the role of the state in producing cultural nationalism. In the field of heritage studies too, the importance of the state in defining 'heritage' has also been acknowledged. Yet thus far, more

precise claims about why the state acts to define certain objects as ‘heritage’ and when it does not, or when state action takes and through which actors and forms. Whilst the role of the state is acknowledged, there are few specific hypotheses or even general claims about it.

Using the cases, we can highlight four factors and put forward possible hypotheses about the role of the state. Our claims must be modest since we have only examined one domain in a limited number of cases and time periods. Moreover, we recognise that the presence and interactions have varied across specific contexts, and that they may be inter-related- individual papers explore in detail the nature of the factors in each case and their effects. Nevertheless, our findings and tentative hypotheses may serve as lines of analysis for specific cases both for historic buildings in other cases and time periods and also for other forms of heritage and cultural nationalism.

The most visible explanatory has been regime change, especially revolution. This has often been followed by debates about whether and how to preserve the buildings of the previous regime and then the extension of the state’s role. Examples include France on numerous occasions since 1789, or Italy after 1870. On the contrary, lack of revolution or regime stability have been accompanied by later development of a direct state role, exemplified by Britain where major legislation to restrict private property rights waited until 1944. Hence a first hypothesis is that regime change accelerates state action to protect historic buildings.<sup>17</sup>

Institutional inheritance is a second factor. Here the hypothesis is that if state actors inherit legislation and organisations that support cultural nationalism, then it is easier to continue and extend such policies when a nation state or a new regime is established. Italy after 1870 or India after independence offer a good examples where the organisations or legislation of previous regimes were kept. Once organisations for protection exist, they often seek to widen and professionalise their activities and regulation. They can resist alternative policies- for instance, in Russia after 1917 state preservation officials sought to protect certain buildings offers another illustration- even under Stalin. They may seek to preserve difficult or unpopular buildings, such as ‘dark heritage’ in Germany or ‘brutalist’ architecture in Britain.

Relations between the current state and non-state actors offer a third explanatory factor. When relations are good, state protection may be limited, as the state relies on friendly non-state actors, who may be close allies or even de facto members of the state. The reliance of the British government on aristocrats or the National Trust stands in striking contrast to the desire of governments in France, Italy, Russia or India to control preservation, and indeed to limit the role of non-state groups, especially certain religious ones. One of the major attractions of UNESCO regulation is that listing as a world heritage site depends on nominations by states, with no official role for non-state groups.

Internal and external threats to the state provide a fourth factor that stimulates state action. State actors have often turned to historic buildings protection in wars, even reversing previous policies. This has been seen in Russia and Britain in World War Two or France since 1789. Equally, state actors use historic building policies as part of domestic political strategies which can range from seeking national unity to pursuing a particular form of nationalism at the expense of certain groups.

In conclusion, the study of historic buildings protection illustrates that cultural and political nationalism are separate, as in some cases, protection came before the nation state, but in others afterwards. But it also shows the strong linkages between them. In several cases, the



formation and development of the modern nation state went hand in hand with the extension of state policies for historic buildings. It also demonstrates that even after a political nation state is formed, state policies to mould national identity through historic buildings continue. In seeking to analyse and explain the state's role and its policies, variation over time and place in the cases studied suggest that medium-level theorising may be more profitable than seeking broad or fixed hypotheses about the role of the state in historic buildings preservation, or more generally, the role of cultural nationalism and its relationship with political nationalism. Using our cases, we underline that the state actively engages in the cultivation of cultural nationalism as part of creating, strengthening and moulding cultural nationalism.

## REFERENCES

Anderson, B. 2006. *Imagined communities. Reflections on the origins and spread of nationalism*. 2nd edn. Rev. London: Verso.

Auduc, A. 2008. *Quand les monuments construisaient la nation. Le service des monuments historiques de 1830 à 1940*. Paris : Comité d'histoire du ministère de la Culture.

Berger, S. and Conrad, C. 2015. *The past as history : national identity and historical consciousness in modern Europe*. Basingstoke: Palgrave Macmillan.

Billig, M. 1995. *Banal Nationalism*. London: Sage.

Breuilly, J. 1993. *Nationalism and the State*. 2<sup>nd</sup> edn. Manchester: Manchester University Press.

Casini, L. 2010. (ed). *La globalizzazione dei beni culturali*. Bologna: Il Mulino.

Choay, F. 1992. *L'Allégorie du patrimoine*. Paris: Seuil.

Coward, M. 2008. *Urbicide, The Politics of Urban Destruction*. London: Routledge.

Cowell, B. 2008. *The Heritage Obsession*. Stroud: Tempus Press.

Delafons, J. 1997. *Politics and Preservation. A policy history of the built heritage 1882-1996*. London: SPON.

Déloye, Y. 2013. 'National identity and Everyday Life' in Breuilly, J. (ed), *The Oxford Handbook of the History of nationalism*. Oxford: Oxford University Press.

Denslagen, W. 1994. *Architectural restoration in Western Europe*. Amsterdam: Architectura and Natura Press.

Harrison, R. 2013. *Heritage: Critical Approaches*. London: Routledge.

Harvey, D. 2001. 'Heritage Pasts and Heritage Presents: temporality, meaning and the scope of heritage studies.' *International Journal of Heritage Studies*, 7,4: 319-338.

Hewison, R. 1987. *The Heritage Industry: Britain in a Climate of Decline*. London: Methuen.

Hobhouse, H. 1971. *Lost London*. London: Macmillan.

Hobsbawm, E. and Ranger, T. (eds) 1983. *The Invention of Tradition*. Cambridge University Press.

Hutchinson, J. 1987. *The dynamics of Cultural Nationalism: The Gaelic Revival and the creation of the Irish nation state*. London: Allen and Unwin.

Hutchinson, J. 1994. *Modern Nationalism*. Glasgow: Fontana.

Hutchinson, J. 2013. 'Cultural nationalism', in Breuilly, J. (ed), *The Oxford Handbook of the History of nationalism*. Oxford: Oxford University Press.

[Jokilehto](#), J. 1999. *A History of Architectural Conservation*. Oxford: Butterworth-Heineman.

Kelly, C. 2014. *Remembering St Petersburg*. Oxford: Triton Press.

Koshar, R. 1998. *Germany's transient pasts. Preservation and National Memory in the Twentieth Century*. University of North Carolina Press.

Koshar, R. 2000. *From monuments to Traces: Artifacts of German memory 1870-1990*. Berkeley: University California Press.

Leerssen, J. 2006. 'Nationalism and the cultivation of culture'. *Nations and Nationalism* 12,4: 559-578.

Lowenthal, D. 1998. *The Heritage Crusade and the Spoils of History*. Cambridge: Cambridge University Press.

Macdonald, S. 2009. *Difficult Heritage. Negotiating the Nazi past in Nuremberg and beyond*. Basingstoke: Macmillan.

Mandler, P. 1997. *The Fall and Rise of the Stately Home*. Yale University Press.

Martigny, V. 2008. 'The Importance of Culture in Civic Nations: Culture and the Republic in France'. *Nations and Nationalism* 8,3: 543-559.

Nora, P. (ed). 1984–1992. *Les Lieux de mémoire* (seven volumes). Paris: Gallimard.

Parpagliolo, L. 1932. *Codice delle antichità e degli oggetti d'arte*. Roma: Libreria dello Stato.

Pendlebury, J. 2000. 'Conservation, Conservatives and Consensus: The Success of Conservation under the Thatcher and Major Governments, 1979-1997'. *Planning Theory and Practice* 1,1: 31-52.

Poulot, D. 2009. *Une histoire du patrimoine en Occident XVIIIe-XXI<sup>e</sup> siècle* 2<sup>n</sup> ed. Paris: Presses Universitaires de France.

Schönle, A (2011) *Architecture of Oblivion: ruins and historical consciousness in modern Russia*. North Illinois University Press.

Sengupta, I. 2015. 'Culture-keeping as State Action: Bureaucrats, Administrators, and Monuments in Colonial India'. *Past and Present* Supplement 10: 153-177.

Settis, S. 2002. *Italia S.p.A. L'assalto al patrimonio culturale*. Torino: Einaudi.

Smith, A.D. 1999. *Myths and Memories of the Nation*. Oxford: Oxford University Press.

Smith, A.D. 2013. *The Nation Made Real*. Oxford: Oxford University Press.

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

Smith, S. 2015. 'Contentious Heritage: The Preservation of Churches and Temples in Communist and Post-Communist Russia and China', *Past and Present*, Supplement 10, 178-213.

Swenson, A. 2013. *The Rise of Heritage. Preserving the Past in France, Germany and England, 1789–1914*. Cambridge: Cambridge University Press.

Thiesse, A-M. 1999. *La création des identités nationales, Europe XVIIIe-XXe siècle*. Paris: Seuil.

Thiesse, A.M. 2013. *The Transnational Creation of National Arts and Crafts in 19th-Century Europe*. Antwerp: NISE.

Thurley, S. 2013. *Men from the Ministry*. Yale University Press.

Wright, P. (2009) [1985]. *On Living in an Old Country*. Oxford: Oxford University Press.

Zan, L. and Bonini Baraldi, S. 2012. 'Managing Cultural Heritage in China. A View from the Outside'. *China Quarterly* 210: 456-481.

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<sup>1</sup> See also the recent special issue on internationalisation of heritage, which was published after the papers in this special edition were written- *Past and Present Supplement* 10 (2015). It focuses on the internationalisation of heritage, whereas our focus is more directly on the state and domestic policy making.

<sup>2</sup> Sometimes referred to as 'nationalism from below' although it may be more accurate to say nationalism from societal actors.

<sup>3</sup> We focus on the period after 1789, mainly due to our concentration on policies, but action by monarchs or pre-1789 public bodies did exist; for a discussion of the spread of heritage globally, especially in non-Western states, see Betts and Ross (2015) and the special issue of *Past and Present Supplement* 10 (2015).

<sup>4</sup> Marx 1852.

<sup>5</sup> Although 'heritage' in the sense of a process of 'producing' the past in the present has a much longer history- see Harvey 2001.

<sup>6</sup> For instance, in Britain, the Ancient Monuments Act of 1882 only concerned a specified list of 68 unoccupied ancient monuments (Delafons 1997, Baldwin Brown 1905). Even the French law of 1887, which required ministerial permission to demolish, alter or repair protected buildings, only applied to publicly-owned ones (Thatcher this volume).

<sup>7</sup> Cf. <http://whc.unesco.org/en/list>.

<sup>8</sup> See Settis 2002 and Parpagolio 1932.

<sup>9</sup> For instance, the Ministry of Culture, Media and Sport in the UK and Mibact (the Ministry of Cultural Assets and Tourism) in Italy.

<sup>10</sup> Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990; for more information on the criteria used, see DCMS 2010.

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<sup>11</sup> Protected as a grade II listed building.

<sup>12</sup> Thus for instance, the 1943 French law on the ‘abords’ prohibited developments that could damage views of a historic monuments in a radius of 500m of the building, and then entire zones were protected, defined at both national and local level. British planning law after 1944 became increasingly detailed- it expanded from protecting ‘listed buildings’ to also covering entire ‘conservation areas’ (cf. Delafons 1997); the UNESCO protection of World Heritage Sites includes the vicinity- Casini this volume.

<sup>13</sup> Numbers are often difficult to compare across countries due to varying definitions and also allocation of responsibilities, but for instance there were 44 236 monuments historiques in France in 2012- <https://www.data.gouv.fr/fr/datasets/liste-des-immeubles-proteges-au-titre-des-monuments-historiques/>- last accessed 5 January 2015- and 374,000 list entries in England and Wales in 2010, representing no less than 2% of English building stock; in Italy all buildings that are more than fifty years old are covered by legislation.

<sup>14</sup> Thus for example, English Heritage cares for more than 400 historic places and has a budget of around £115m for 2015-16- <http://www.english-heritage.org.uk> accessed 25 April 2015.

<sup>15</sup> National Trust 2015.

<sup>16</sup> Examples of the first were Viollet le Duc in France or James Wyatt in Britain, whereas the best known advocate of maintenance of existing buildings was John Ruskin.

<sup>17</sup> For an analogous argument based on other cases, especially colonial ones, see Betts and Ross 2015 and the special issue of *Past and Present* supplement 10 (2015).