Introduction

> The cultural heritage of a people is the memory of its living culture. It is expressed in many different forms, both tangible (monuments, landscapes, objects) and intangible (languages, knowhow, the performing arts, music, etc.). The origins of this heritage are multifarious, too. In retracing its own cultural lineage, in recognizing the many different influences that have marked its history and shaped its identity, a people is better able to build peaceful relations with other peoples, to pursue what is often an age-old dialogue and to forge its future.[1]
>
> Koïchiro Matsuura at the inauguration of the UN Year for Cultural Heritage (2002)

Following the destruction of the Bamiyan Buddhas by the Taliban in 2001, the United Nations General Assembly proclaimed 2002 as the United Nations Year for Cultural Heritage. The aim was to make public authorities, the private sector and civil society realise how cultural heritage could be an 'instrument for peace and reconciliation' and a 'factor of development'.[2] While mourning the recent destruction of heritage, the UN Year also celebrated the internationalisation of preservation since the Second World War and the thirtieth anniversary of the 1972 World Heritage Convention. As the words of former UNESCO Secretary General Koïchiro Matsuura indicate, efforts have focussed not just on increasing identification with a common world heritage or on promoting knowledge about other cultures. Additionally, care for one's own heritage is fostered as the crucial prerequisite to peaceful relations between peoples. Globally, heritage is increasingly promoted as a force of good. Preservation policies are firmly integrated into the bureaucracies of many modern states, but as local, national and international activities are seen as building upon each other they are also linked

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[1] K. Matsuura, 'United Nations Year for Cultural Heritage', in UNESCO, 'United Nations Year for Cultural Heritage', (2002), http://portal.unesco.org/culture/en/ev.php-URL_ID=15418&URL_DO=DO_TOPIC&URL_SECTION=201.html.

[2] Ibid.

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through a plethora of international and non-governmental organisations.[3] Civic engagement and heritage-related activities have also continuously been growing. For instance, across European countries, European Heritage Days are a magnet for tens of millions annual visitors.[4] In Britain, the National Trust alone has more members than all political parties put together.[5] At the beginning of the twenty-first century, the protection of one's heritage has become a quasi human right. As a result, heritage is mobilised by a variety of actors for a wide variety of purposes. It is adduced to frame the restoration of cathedrals, as well as the preservation of fox-hunting, or the marketing of local cheese, but also for the regeneration of post-industrial regions and the reconstruction of post-conflict communities.

Why did heritage become so important? Where does the belief in its potential to bring prosperity, peace and international understanding come from? Paradoxically, while heritage is used as a universal category in public discourse, the origins of international concern for heritage are perceived to be relatively recent, only dating from the post-war period. Instead, historians have sought explanations for the birth of heritage during the late eighteenth and the nineteenth century overwhelmingly in national contexts.[6] It is frequently claimed that a national 'special path' determined the appearance of heritage consciousness. This is particularly, but not solely, the case for the three European countries forming the object of this study. To put it in a stereotypical way: French heritage is often perceived as the creation of the state, in order to rally the citizens; German heritage as having been developed by the bourgeoisie as a means of self-representation, and English heritage as having been imposed by a threatened ruling class for its own protection.

Every country thus imagines it has invented heritage. But did they all magically imagine heritage at more or less the same time? And why is heritage now seen as an international phenomenon? It makes sense to go back and look at the international origins that were there all along, though for various reasons denied by actors and historians. As explanations for the emergence of heritage have been looked for in relation to the dominant questions in national historiographies, historians not only failed to consider

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[3] On the European level see for instance Europa Nostra, www.europanostra.org.
[4] The Heritage Open Days National Partnership (2011), www.heritageopendays.org.uk.
[5] D. Cannadine, 'The First Hundred Years', in H. Newby (ed.), *The National Trust. The Next Hundred Years* (London, 1995), pp. 11–31.
[6] For a discussion of international and national approaches see D. Gillman, *The Idea of Cultural Heritage* (London, 2006), pp. 27–41.

a wider appropriation of heritage by diverse social groups in each country, but they neglected the emergence of similar ideas and practices in different national contexts and ignored the connections between them. Across countries, major developments occurred repeatedly at the same moments. First, during the French Revolution and the Napoleonic Wars, the destruction of symbols of the old order, changing ideas regarding national community, the nationalisation of property by the Revolutionary government and art looting by the French armies, led to a new notion of 'national heritage' across Europe. The 1830s and 1840s, then, saw the first Europe-wide debates about the protection of the past by the state. While history started to become established as an academic discipline, splendid restorations resurrected lost monuments and a popular culture of heritage emerged. Between 1870 and 1914, finally, modern preservationism was established. The fanciful restorations of national treasures were replaced with a new idea of authenticity emphasising the value of age. What was considered worthy of preservation also changed. The idea of heritage broadened to include vernacular alongside monumental traces, recent alongside distant pasts, nature alongside culture, and traditions alongside objects. Changing popular attitudes manifested in the foundation of a plethora of voluntary associations and meshed with growing concern on the part of the State translating into a wave of legislation.

Can these similarities be purely understood in terms of parallel, and maybe competing national developments? At first sight, it makes sense to look for national explanations, as the long nineteenth century was strongly framed by outbursts of nationalism and a disregard for foreign heritages. The period starts with a nationalist reclaiming of the past during the French Revolution, accompanied by widespread looting of art. The beginning of a new era seems succinctly captured by a petition addressed to all members of the Republic of Letters, asking them to 'stop being cosmopolitans' and restrain their 'vast affection that embraces the entire universe' and instead love their 'fatherland a little more'.[7] The end of the period is likewise dominated by war and destruction, symbolised by the burning of Louvain Library and Rheims Cathedral by the German army in 1914. However, despite this nationalist framing, one only needs to open any preservationist periodical from the nineteenth century to realise that developments across countries did not happen in isolation, but that heritage-makers from different nations were in constant touch with each other. All key moments in the conceptualisation of heritage during the long nineteenth century coincided

[7] C.J. Trouvé, *Le Monietuer universel*, no. 335, 5 fructidor an V (22 Aug. 1796).

with an increase in international contacts between preservationists. Personal travel and correspondence were complemented by the use of diplomatic channels and formalised exchanges between private societies. Since mid-century, the world's fairs and international congresses also provided regular venues for such exchanges. While contacts were mainly used to improve the national situations during the first two waves described above, during the third wave, internationalism became more pronounced. Heritage-makers increasingly used the transnational space not only to exchange ideas about their national situation, but also debated the creation of international institutions and the protection of a common heritage of humanity.

Hence, this book will argue that the rise of heritage cannot be understood without its transnational dimension. It shows how heritage could become an important universal category by analysing the history of heritage in France, Germany and Britain between 1789 and 1914 as an 'entangled history'. To this end it combines a comparison of the three countries with an analysis of multi-directional 'cultural transfers'.[8] It distinguishes between parallel national developments, competing, mutually induced, national developments, and developments at the international level, which had national effects. By showing which similarities and differences were due to indigenous factors, and which had broader transnational origins, it revises explanations given in the three separate national historiographies. Moreover, and perhaps more significantly, by inscribing the entanglements between the three countries into much broader interactions, the book reveals the importance of the global level for the rise of heritage.

The general benefits of comparison have often been pointed out.[9] By revealing that apparently different events can relate to similar causes and that similar events can stem from different reasons, a comparative approach can overcome what Marc Bloch labelled the explanatory lure of 'local pseudo causes'.[10] As such the 'comparative method is capable of rendering historians the most remarkable services, by introducing them to the road that can lead to the real explanations, but also, and perhaps most importantly, if we might begin with a more modest but necessary benefit, by deterring them from certain paths that are nothing but dead ends'.[11] But

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[8] M. Werner and B. Zimmermann, 'Beyond Comparison. Histoire Croisée and the Challenge of Reflexivity', *History and Theory*, 45 (2006), 30–50.

[9] J. Breuilly, 'Introduction. Making Comparisons in History', in Breuilly, *Labour and Liberalism in Nineteenth-Century Europe. Essays in Comparative History* (Manchester, New York, 1992), pp. 1–5.

[10] M. Bloch, 'Pour une histoire comparée des sociétés européennes', in Bloch, *Mélanges historiques* (2 vols., Paris, 1963), I, pp. 16–40, here p. 16.

[11] Ibid., p. 24.

comparison also has its pitfalls. In particular there is a danger of construct-
ing the entities for comparison artificially and of assuming that national
cultures are distinct and closed.[12] Marc Bloch already pointed out that soci-
eties close in time and space are likely to influence each other. This inspired
a school of 'cultural transfer' historians to emphasise the constant recon-
struction of cultures through incorporation and 'acculturation' of foreign
elements.[13] However, as most transfer studies looked only at one spe-
cific transfer, they can implicitly reintroduce the comparative element and
assume transfer from one distinct national culture to another. As a result it
has been suggested to combine the two interdependent approaches, look-
ing at multinational transfers and re-transfers. Yet it remains difficult to
combine comparison and transfer in writing, as one privileges synchrony
and macro-history, the other diachrony and micro-history. It also remains
challenging to capture all multinational transfers and re-transfers as an
almost cubist perspective of simultaneity would be needed. 'Entangled
history' suggests resolving the dilemma by being self-reflexive about the
categories used and to emphasise asymmetries rather than glossing over
them. Yet, while theoretical debates have been flourishing, empirical exam-
ples are lacking. Hence, it is one of the aims of this study to advance the
debate about transnational and global history through empirical work.[14]

Heritage and history

Understanding why the transnational dimension has been written out of the
history of heritage, and why different national historiographies have con-
ceptualised this history so differently is an important prerequisite. Despite
a long-established comparative angle in art-historical work,[15] and a growing

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[12] Cf. M. Espagne, 'Sur les limites du comparatisme en histoire culturelle', *Genèse*, 17 (1994), 112–
21. versus H.G. Haupt, J. Kocka, 'Historischer Vergleich. Methoden, Aufgaben, Probleme. Eine
Einleitung', in Haupt, Kocka (eds.), *Geschichte und Vergleich*. pp. 3–45, esp. p. 10.

[13] M. Espagne and M. Werner (eds.), *Transferts. Les Relations interculturelles dans l'espace
Franco-Allemand, XVIIIe-XIXe siècles* (Paris, 1988); E. François, H. Siegrist, J. Vogel (eds.), *Nation
und Emotion. Deutschland und Frankreich im Vergleich, 19. und 20. Jahrhundert* (Göttingen, 1995);
E. François, M.C. Hook-Demarle, R. Meyer-Kalkus, M. Werner, P. Despoix (eds.), *Marianne-
Germania. Deutsch-französischer Kulturtransfer im europäischen Kontext, 1789–1914* (2 vols., Leipzig,
1998); R. Muhs, J. Paulmann, W. Steinmetz (eds.), *Aneignung und Abwehr. Interkultureller Trans-
fer zwischen Deutschland und Großbritannien im 19. Jahrhundert* (Bodenheim, 1998); L. Jordan,
B. Kortländer (eds.), *Nationale Grenzen und internationaler Austausch. Studien zum Kultur- und
Wissenschaftstransfer in Europa* (Tübingen, 1995).

[14] For recent methodological reflections see G. Budde, S. Conrad, O. Janz (eds.), *Transnationale
Geschichte. Themen, Tendenzen und Theorien* (Göttingen, 2006).

[15] G. Germann, *Gothic Revival in Europe and Britain. Sources, Influences and Ideas* (London, 1972);
J. Jokilehto, *A History of Architectural Conservation* (Oxford, 1999); W. Denslagen, *Architectural
Restoration in Western Europe. Controversy and Continuity* (Amsterdam, 1994).

concern with comparative and transnational questions more broadly,[16] the
main standard works on the history of heritage have often extrapolated
from national experiences under the cover of a universalist title, cherry-
picking rather than comparing international examples.[17] More recently,
attention has been drawn to the differences between Western and non-
Western understanding of heritage, but intra-European differences and
global connections are rarely highlighted.[18] The recent efforts to establish
'heritage studies' as a discipline have also not shed much light on this ques-
tion, as their concern is more with heritage in the present than in the past.[19]
The rich historiographies, which exist at the national level, on the other
hand are often shaped by national traditions of administering heritage.
Broader historical work has seen the history of heritage mainly through
the lens of other dominant questions in national historiographies. Casting
aside some nuances, in France, the debates about the history of heritage are
still to a certain degree about assessing the legacy of the French Revolution.
In Germany, the study of nineteenth-century heritage has been conducted
as part of the German *Sonderweg* debate, while in Britain the 1980s 'Her-
itage Debate', dominated by worries about the rise of the heritage industry
in relation to the decline of the industrial spirit and the revival of 'Victorian
Values', has cast a long shadow.[20]

A large part of the literature on heritage is more or less openly a *littérature
engagée*, using the history of preservation for particular agendas in current

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[16] Gillman, *Idea of Cultural Heritage*. M. Hall (ed.), *Towards World Heritage. International Origins of the Preservation Movement* (Aldershot, 2011); S. Bann, *The Clothing of Clio. A Study of the Representation of History in Nineteenth-Century Britain and France* (Cambridge, 1984); S. Berger, C. Lorenz, B. Melman (eds.), *Popularizing National Pasts, 1800 to the Present* (London, 2011); B. Savoy, *Patrimoine annexé. Les biens culturels saisis par la France en Allemagne autour de 1800* (2 vols., Paris, 2003); A.S. Rolland, H. Murauskaya (eds.), *Les Musées de la Nation. Créations, transpositions, renouveau. Europe XIXe-XXe siècles* (Paris, 2009). C. Manias, 'Learned Societies and the Ancient National Past in Britain, France and Germany, 1830–1890', unpublished Ph.D. dissertation, University of London (2008); U. Protz, 'National Treasures'/'Tresor Nationaux': The control of the Export of Works of Art and the Construction of 'National Heritage'/'Patrimoine in France and the United Kingdom, 1884–1959', unpublished Ph.D. dissertation, European University Institute (2009); D. Trom, 'Natur und nationale Identität. Der Streit um den Schutz der "Natur" um die Jahrhundertwende in Deutschland und Frankreich', in François, Siegrist, Vogel (eds.), *Nation und Emotion*, pp. 147–67; A.K. Wöbse, *Weltnaturschutz. Umweltdiplomatie in Völkerbund und Vereinten Nationen 1920–1950* (Frankfurt, 2012).

[17] J.P. Babelon and A. Chastel, *La Notion de patrimoine* (Paris, 1994); F. Choay, *L'Allégorie du patrimoine* (Paris, 1992); D. Lowenthal, *The Past is a Foreign Country* (Cambridge, 1985); Lowenthal, *The Heritage Crusade and the Spoils of History* (Cambridge, 1998).

[18] L. Smith, *Uses of Heritage* (London, New York, 2006).

[19] J. Carman and M.L. Stig Sørensen (eds.), *Heritage Studies, Methods and Approaches* (London, New York, 2009).

[20] E.g. R. Hewison, *The Heritage Industry. Britain in a Climate of Decline* (London, 1987); W. Speitkamp, *Die Verwaltung der Geschichte. Denkmalpflege und Staat in Deutschland, 1871–1933* (Göttingen, 1996); D. Poulot, *Patrimoine et musées. L'institution de la culture* (Paris, 2001).

heritage politics.[21] Assumptions about heritage have also been particularly shaped by presentist concerns in the field of memory studies. Although many conceptual nuances exist between 'heritage' and 'memory', the two notions have often been used interchangeably.[22] Importantly here, the national focus of heritage studies can in part be explained by the trend towards orchestrating an explicit revival of national history through the history of memory. Especially Pierre Nora's *Lieux de mémoire* played a major role in fostering a national orientation. Whilst the idea of invented memory seemingly deconstructs nationalist assumptions, Nora presented the writing of the *Lieux de mémoire* as a patriotic endeavour to preserve vanishing memories, offering a way to reinvent the writing of national history through commemoration in a Europeanising and globalising world.[23] This appealed to other countries too and national *Lieux de mémoire* projects soon followed across Europe in the 1990s.[24] A range of scholars have since challenged the primacy of the national in studies of memory, stressing the need to pay more attention to the local context on the one hand and to European and postcolonial perspectives on the other.[25] Yet some of these attempts are no less charged with identity-building objectives. The aim of this book is not to argue that European or international origins are more enobling than national ones, but simply to open a dialogue between

[21] See J. Le Goff, 'Introduction', in Le Goff (ed.), *Patrimoine et passions identitaires. Actes des Entretiens du Patrimoine Paris 1997* (Paris, 1998), p. 13.

[22] As Pierre Nora stated in the *Lieux de mémoire*, 'Heritage [*patrimoine*]: in a sense this word could have covered this entire book'. P. Nora, Introduction to the section on 'Patrimoine', in Nora (ed.), *Les Lieux de mémoire* (7 vols., Paris, 1984–92, reprint, 3 vols., Paris, 1997), I, pp. 1429–643, here p. 1431. For similar uses see D. Sherman, *The Construction of Memory in Interwar France* (Chicago, 1999), pp. 2–3; T. Benton, 'Introduction', in Benton (ed.), *Understanding Heritage and Memory* (Manchester, 2010), p. 1.

[23] See P. Nora, 'La Nation-mémoire', in *Les Lieux de mémoire*, II, pp. 2207–16, his introductions to the different volumes of the Lieux de mémoire, as well as the revised ones in the English translation P. Nora (ed.), *Realms of Memory. Rethinking the French Past* (3 vols., New York, 1996).

[24] M. Insenghi (ed.), *I luoghi della memoria* (3 vols., Rome, Bari, 1987–8); O. Feldbaek (ed.), *Dansk identiteshistorie* (Copenhagen, 1991–2); P. den Boer, W. Frijhoff (eds.), *Lieux de mémoire et identités nationales* (Amsterdam, 1993); N.C.F. van Sas (ed.), *Waar de blanke top der duinen: en andere vaderlandse herinneringen* (Amsterdam, 1995); M. Csáky (ed.), *Orte des Gedächtnisses* (Vienna, 2000); E. François and H. Schulze (eds.), *Deutsche Erinnerungsorte* (3 vols., Munich, 2001).

[25] For instance E. Apter, *Continental Drift: From National Characters to Virtual Subjects* (Chicago, 1999); Sherman, *The Construction of Memory*; E. Ezra, *The Colonial Unconscious: Race and Culture in Interwar France* (Ithaca, 2000); B. Stråth (ed.), *Myth, Memory and History in the Construction of Community. Historical Patterns in Europe and Beyond* (Brussels, 2000); 'Schwerpunktthema: Europäische lieux de mémoire?', *Jahrbuch für Europäische Geschichte*, 3 (2002); 'European Lieux de Mémoire', conference of the German Historical Institute London, Cumberland Lodge, 5–7 July 2002, report by B. Stuchtey, *German Historical Institute London Bulletin*, 24.2 (2002), pp. 121–5; 'Patrimoines de l'Europe, patrimoine européen?' 15e Entretiens du Patrimoine, 19–21 March 2007, Paris, www.culture.gouv.fr/edp2007/presentation.htm; K. Buchinger, C. Gantet, C. and J. Vogel (eds.), *Europäische Erinnerungsräume* (Frankfurt, New York, 2009).

different national and disciplinary traditions and understand how a process could simultaneously lead to different national approaches and to a common culture of heritage. By historicising heritage in such a way, I hope to contribute more generally to explaining the origins of many current debates and offer a way to question hegemonic accounts of how heritage should be interpreted.

Words and things

Despite the confident tone of some of the definitions of heritage, there is much debate on what is meant by 'heritage' and whether it can or should be defined at all. Designations range from enumerations of potential remains, to defamations of heritage as 'anything that sells' or celebrations of it as 'anything you want'. Most current definitions stress that virtually any legacy from the past, tangible or intangible, can become heritage, as long as a community wants to claim and transmit it.[26] This attitude is captured in UNESCO's definition of 'heritage' as 'our legacy from the past, what we live with today, and what we pass on to future generations',[27] and which can be 'expressed in many different forms, both tangible (monuments, landscapes, objects) and intangible (languages, knowhow, the performing arts, music, etc.)'.[28] However, neither this definition nor the word heritage itself have been used in this way for more than a few decades in English, while other languages have different terms that do not necessarily have the same resonances. This poses obvious problems for studying the history of 'heritage'. Applying the word and the broad definitions of today retrospectively is anachronistic. A prospective definition is equally problematic because a plethora of different words, ideas and movements with different names could be taken as a starting point.

This problem of course does not just apply to heritage, but to the history of any concept. As Jacob Burckhardt long ago observed, 'sharply defined terminology belongs to Logic but not to History'. Whereas philosophical terminology needs to be as 'definite and compact as possible', historical terminology needs to be 'as floating and open as possible' to take

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[26] See J. Carman and M.L. Stig Sørensen, 'Heritage Studies. An outline', in Carman, Sørensen (eds.), *Heritage Studies, Methods and Approaches* (London, New York, 2009), pp. 11–28, here pp. 11–12; R. Harrison, 'What is Heritage?' in Harrison (ed.), *Understanding the Politics of Heritage* (Manchester, 2010), pp. 5–42.

[27] UNESCO, 'World Heritage', http://whc.unesco.org/en/about.

[28] Matsuura, 'United Nations Year for Cultural Heritage'.

into account the changing nature of definitions over time.[29] Moreover, a
transnational approach is not only confronted with asymmetries between
categories in different times but also with asymmetries between cultures
which remain often untranslatable.[30] Whereas today, both English and
French have generic, albeit not congruent terms (*heritage* and *patrimoine*),
there is no corresponding single word in German. In addition to *Kulturerbe*
a variety of expressions are needed such as *Kulturgüter* (cultural property),
Denkmal (monument) or *Heimat* (nominally 'homeland', but carrying
implications that translations are not quite able to provide). To complicate
matters further, the semantic field of 'heritage' has been steadily chang-
ing and growing with the evolution of the concept. While *patrimoine* and
heritage were already in use in the nineteenth century, at this time people
referred more generally to *monuments* in all three languages. Yet a number
of partial synonyms also exist in all languages, many of these come from a
common Greco-Latin pool.

   The scholarly vocabulary also varies, stemming from, and in turn lead-
ing to, different foci in the respective scholarly traditions. In French
a number of neologisms are employed to describe the process of con-
ceptualisation and institutionalisation which do not have an English
or German equivalent, such as *patrimonialiser* (to turn something into
'heritage'), *patrimonialisation* (the process of creating (the concept of)
'heritage'), *conscience patrimoniale* ('heritage-awareness'), *champ patrimo-
niale* (everything that is included in the notion of 'heritage') and most
recently *patrimonialisateur* ('heritage-maker'). German on the other hand
has developed a number of compounds since the late nineteenth century
on the basis of *Denkmal* and *Heimat*: *Denkmalpflege* (the care of monu-
ments), *Denkmalschutz* (the legal protection of monuments), and similarly
Heimatpflege and *Heimatschutz* (the latter had beforehand referred to the
military defence of the homeland). The preservation movement is des-
ignated as *Denkmal-* and *Heimatbewegung*. '*Heimat*-"buffs"' were called
Heimatkundler (*Heimat*-scholar), *Heimatschützer (Heimat*-protector) or

[29] J. Burckhard, *Über das Studium der Geschichte. Der Text der Weltgeschichtlichen Betrachtungen auf
    Grund der Vorarbeiten von Ernst Ziegler nach den Handschriften*, ed. P. Ganz (Munich, 1982), p. 293.
[30] See R. Koselleck, U. Spree, W. Steinmetz, 'Drei bürgerliche Welten? Zur vergleichenden Seman-
    tik der bürgerlichen Gesellschaft in Deutschland, Frankreich und England', in H.J. Puhle (ed.),
    Bürger in der Gesellschaft der Neuzeit. Wirtschaft – Politik – Kultur (Göttingen, 1991), pp. 14–
    58; J. Leonhard, *Liberalismus. Zur historischen Semantik eines Deutungsmusters* (Munich, 2001);
    B. Cassin (ed.), *Le Vocabulaire européen des philosophies. Dictionnaire des intraduisibles* (Paris, 2004);
    A. Gerber, 'Transnationale Geschichte "machen" – Anmerkungen zu einem möglichen Vorge-
    hen', geschichte.transnational, 2 April 2005, http://geschichte-transnational.clio-online.net/forum/
    2005-04-001.

simply *Heimatler*, whereas *Denkmalpfleger* (monument-carer) increas-
ingly designated a professional conservator. *Heimatgedanken*, *Heimatsinn*,
Heimatgefühl, *Heimatliebe* (*Heimat*-thoughts, -sense, -sentiment and -love)
led to all sorts of *Heimatbestrebungen* (*Heimat*-endeavours),[31] including
the development of *Heimatkunst* and *Heimatstil* (*Heimat*-art and *Heimat*-
style), all engendering a veritable *Denkmalcultus* (cult of monuments). The
totality of all monuments was called *Denkmalbestand*. Finally there even is
a word for the concept of monument: *Denkmalbegriff*.

  The evolution of key words has been studied to different degrees for the
respective languages,[32] but no small amount of confusion remains about
why and when words evolved and replaced each other.[33] The differences
in words between different cultures have also often been noticed,[34] but
explanations for these differences remain unsystematic and lack a proper
engagement with foreign cases.[35] For instance, Robert Hewison's assertion
that *patrimoine* was derived from *patrie*, and therefore indicates a more
national content of the French *patrimoine* than the English word 'heritage'
with its alleged emphasis on private property, is flawed.[36] Both *patrie* (from

[31] C. Applegate, *A Nation of Provincials. The German Idea of Heimat* (Berkeley, Los Angeles, Oxford,
      1990), pp. 3–19.
[32] On German: W. Sauerländer, 'Erweiterung des Denkmalbegriffes?', *Deutsche Kunst und
      Denkmalpflege*, 33 (1975), 117–30; G. Mörsch, 'Zur Differenzierbarkeit des Denkmalbegriffs',
      Deutsche Kunst und Denkmalpflege, 39 (1981), 99–108; R. Alings, *Monument und Nation. Das Bild
      vom Nationalstaat im Medium Denkmal* (Berlin, New York, 1996), pp. 1–15; Speitkamp, *Verwaltung
      der Geschichte*, pp. 83–91; Applegate, *Nation of Provincials*, pp. 3–19; R. Petri, 'Deutsche Heimat
      1850–1950', *Comparativ*, 11.1 (2001), 77–127; G. Oesterle, 'Zur Historisierung des Erbebegriffes', in
      B. Thum (ed.), *Gegenwart als kulturelles Erbe. Ein Beitrag der Germanistik zur Kulturwissenschaft
      deutschsprachiger Länder* (Munich, 1985), pp. 411–51. On French: Babelon, Chastel, *La Notion de
      patrimoine*; A. Desvallées, 'Emergence et cheminement du mot patrimoine', *Musées et collections
      publiques de France*, 208.3 (1995), 6–29; Desvallées, 'A l'origine du mot "patrimoine"', in D. Poulot
      (ed.), *Patrimoine et modernité* (Paris, Montréal, 1998), pp. 89–105; Y. Lamy (ed.), *L'Alchimie du
      patrimoine. Discours et politiques* (Talence, 1996). On English: P. Berton, 'What We Mean by Her-
      itage', *Canadian Heritage*, 7 (1981), 44; G. Davison, 'Heritage. From Patrimony to Pastiche', in
      G. Fairclough, R. Harrison, J.H. Jameson Jnr and J. Schofield, *The Heritage Reader* (London, New
      York, 2008), pp. 31–41 and S. Hall, 'Whose Heritage? Un-settling "The Heritage", Re-imagining
      the Post-Nation', in ibid., pp. 219–28.
[33] E.g. Choay, *L'Allégorie du patrimoine*, pp. 9–10; F. Bercé, *Dès Monuments historiques au patrimoine
      du XVIIIe siècle à nos jours ou 'Les égarements du coeur et de l'esprit'* (Paris, 2000), p. 7.
[34] Abdelaziz Daoust statement in 'Debat de la Matinée du 6 Janvier', in Le Goff (ed.), *Patrimoine et
      passions identitaires*, p. 64; J. Schofield, 'Heritage Management, Theory and Practice', in Fairclough
      et al. (eds.), *The Heritage Reader*, p. 16; Carman and Stig Sørensen (eds.), 'Heritage Studies',
      pp. 11–13.
[35] See for an exception, the nuanced discussion of the French and North African context: N. Oulebsir,
      Les Usages du patrimoine. Monuments, musées et politiques coloniale en Algérie 1830–1930 (Paris, 2004),
      pp. 13–16.
[36] R. Hewison, 'La Prise de conscience du patrimoine en Grande-Bretagne', in P. Nora (ed.), *Science
      et conscience du patrimoine. Actes des Entretiens du Patrimoine Paris 1994* (Paris, 1997), pp. 357–63.