SAFEGUARDING CULTURAL RESOURCES OF BUILT HERITAGE; IDENTIFYING GAPS IN POLICIES AND PRACTICES: A CASE STUDY OF ABBOTTABAD, PAKISTAN.

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Abstract

The identification, preservation and promotion of built heritage is a collective responsibility of Federal, District and local governments along with relevant departments of Sports, Culture, Tourism, Archaeology, and Museums & Youth Affairs. Antiques act of 2016 of Government of KP chalks out a detailed process of identification, preservation, renovation and promotion of cultural heritage. Abbottabad has a rich cultural heritage dating from pre-colonial era but not many sites are included in the list of cultural heritage for the preservation. The study aims to identify the built heritage of cultural significance and then try and understand why these historical remains of cultural significance were not included in the list of cultural heritage by the archaeological department and identify gaps in policy and practices. The study used historical documents, published reports and institutional documents of the local government to identify the sites of cultural significance, interviewed local community in the vicinity of these sites and representatives of local government and interviewed representatives of relevant departments to identify such gaps.
1. **Introduction:**

Cultural heritage includes tangible material remains and intangible customs, memories and rituals of societies that represent their activities in the past and are transmitted from to future generations (UNESCO 1998). To most people, cultural heritage is strongly linked to how they express their identity, customs, traditions and history (Segobye, 2007). It principally includes human-made products such as archaeological sites or monuments, but most culture would also include natural landscapes which are valued for their religious or sacred significance (Keitumetse, 2007). To most cultures, materials of the past are transformed into cultural heritage when the legacy of past societies is re-evaluated, inherited and re-used by current people (Skeates, 2000). Therefore, cultural heritage resources are tangible materials and intangible customs from the past that are consistently appreciated, re-constructed and re-used by living communities to suit their present needs: in other words, they are used for economic gain, education, research, national identity, religious and other traditional activities (Keitumetse, 2007). Socio-cultural preferences, commercial opportunities, and aesthetic aspirations inspire the survival of particular structures, landscapes and morphologies. These choices are the outcome of values and meaning of different aspects of the past and the present, the current generation attach with them (Graham, 2000). One of the major threats to cultural resources is the unprecedented rise in scale and volume of construction projects. This means preservation of cultural heritage will require increased attention and rapid action by cultural heritage professionals and archeologists (Bom Naffé, 2008). An effective conservation policy needs to answer the fundamental question of what to protect and why (i.e. what counts as valid 'heritage') at the local level. The role of advocacy groups that could help preserve the certain artifacts of cultural heritage and sustain the political and economic pressure for change is all the more important in this context (Larkhan, 1996; Hobson, 2004).

A Universal definition of cultural heritage was first coined immediately after World War II. Research in cultural heritage preservation got prominence in wake of irreparable damage incurred by cultural artifacts (Lennon, 2006). UN Educational, Scientific and Cultural Organization (UNESCO) and the International Council of Monuments and Sites (ICOMOS) has been instrumental organizations in finding a common terminology and scope of cultural heritage management (Ahmad, 2006). Some of such definitions are given here: Monuments, buildings, landscape, artifacts and object; as well as cultural traditions, music, theatre and dialect that might be pleasing aesthetically or ugly, tangible or intangible, old or new, unsafe and unprepossessing. It is something valued by society, by specific groups within society, and by individuals. (Schofield 2008). A place or object is considered part of the national estate if it has cultural significance for the community or holds a special place in national history (Gerard, 2004). In successful heritage management, local communities have been looked upon as the custodians of their heritage resources, a gesture that legislation is responsive to the public (Chiwaura, 2005). In this perspective,
heritage legislation is expected to place a great emphasis on community awareness. The strategy of involving and motivating local populations to safeguard their heritage has succeeded in Zimbabwe and Botswana where the niche for heritage development has been articulated within the framework of tourism and community development. In Botswana, the Department of Wildlife and National Parks proposed and implemented a project called Community Based Natural Resource Management, which principally aimed at attaining community participation in the management of wildlife resources (Segobye, 2007). In Zimbabwe, the Communal Areas Management Program for Indigenous Resources has successfully demonstrated effective public participation in heritage management (Chiwaura, 2005).

Brief History of Management of Cultural Heritage in Pakistan

The British colonial legacy in South Asian countries is marked by the conservation of monuments, regardless of their religious or historical affiliation. Creation and organization of a conservation wing under the centralized administration of the Director General and providing detailed guidelines on conservation (Conservation Manual, 1923) contributed substantially towards saving the heritage sites and monuments from disintegration. The current policies and procedures of conservation in the South Asian countries are largely a continuation of the British Raj that are now slightly modified and fine-tuned to mirror the national needs and aspirations of the individual countries.

After the creation of Pakistan, Federal Archaeology Department was responsible for the conservation and management of archeological sites and Museums. Divided in two circles i.e. Southern and Northern circles, Northern circles was again sub divided into four Sub-Regional Offices located at Multan, Taxila, Peshawar and Gilgit. One Sub-Regional Office at Quetta was created in the Southern Circle of Archaeology with its headquarter at Hyderabad (Mughal, 2010). In 2011, the control of all 402 ‘protected’ and World Heritage sites was transferred to provincial governments of the four provinces of Pakistan. Under the new setup, the post of the Director General of Archaeology of the erstwhile Federal Department of Archaeology still survives but with restricted jurisdiction only over the Federal Capital Area. Each province has established its Department of Archaeology. They are gradually adopting the Federal Antiquities Act that was passed in 1975. Although three of the four provinces (with the exception of Baluchistan) have their provincial laws on heritage and separate list of sites and monuments, legislation and institutional performance in Pakistan has been rather poor. Other than Marshall’s Conservation Manual of 1923, there are no written rules or laws, policies or procedures for the conservation of monuments (Mughal 1995; 1998). The provisions of Antiquities Act, 1975 (amended in 1990) also do not specify the philosophy, rules or procedures of conservation of monuments in the country. The Act also lacks the administrative and legal powers to deal with encroachers on ancient sites and to impose penalty on those who cause damage to the cultural properties.
This study is an outcome of the project entitled, ‘Documentation and Valuation of Cultural Heritage of Abbottabad’. Abbottabad is a city located in the Khyber Pakhtunkhwa, Pakistan and is the third-largest city in the province after Peshawar and Mardan. The city is situated in the Orish Valley, 150 km north of Islamabad (capital of Pakistan) and 200 km east of Peshawar at an altitude of 4,120 feet (1,260 m). The region has a historic significance and has been a battle ground between local Muslim population and invading Sikhs of Punjab during nineteenth century. Sikh ruled the region from 1818 till 1875 and built a number of forts (at Haripur, Nawan shehr, Mansehra etc), gurdwaras and new cities. The headquarter of the Sikh rule was at Haripur till 1853. In 1853 the military garrison of the district was shifted to Abbottabad. Later in 1875, Abbottabad was sanctioned as third tehsil (Haripur and Mansehra being the first two) of the district Hazara (Hazara Gazetteer, 1883-84). Most of the remaining buildings in the city of Abbottabad belong to this era. Not only colonial architecture is visible but some remains of Sikh and Hindu religious buildings were also documented during the data collection. The few prominent remaining buildings include Snt. Luke’s church, Lockheart and Kipplings houses, city courts, Burn Hall school and college building, Hindu temples are Nawan Shehr and Gurdwara in downtown of Abbottabad. Rapid and unplanned urbanization, encroachments, weak institutions and policies regarding safeguarding of cultural heritage can be considered responsible for rapid destruction of cultural resources of that era.

The study aimed to investigate the present status and future of these cultural sites. The specific objectives were: 1) What is the process of identifying and declaring a building of historical significance a cultural heritage or resource 2) What government departments are responsible for the management of these sites 3) What mechanism exists at least at policy level to maintain, preserve, renovate and promote these heritage sites 4) What practices and procedure are being adopted on ground for the preservation and promotion of this cultural heritage and finally what gaps exist between policy and practices to safeguard these monuments of historic significance.

2. Methodology

Both primary and secondary sources were used to collect the data. Archives, books, internet sources and published reports were used to make a list of all the buildings and monuments of cultural significance. The study area was divided in smaller geographical units (31 union councils) and on ground verification of the already documented sites was done. Key informants from each union council helped in arranging the visit of each union council. New sites, that had not been documented already, were added in the list and the authenticity of the site was verified through primary data. Two categories of the built heritage were documented i.e. cultural property of religious significance and property of political or historical significance. First category i.e. cultural property of religious significance could be further categorized into three sections i.e. i) Muslim property, ii) Hindu and Sikh religious properties and iii) Christian religious properties. Representative sample from each of this sub group was selected details of which are given as under:
i) Ilyasi mosque, representing Muslim religious building.

ii) Gurdwara (Sikhs’ place of worship) located in down town of Abbottabad in the street named as ‘Gurdawara Gali’ (street of Gurdawara).

iii) Hindu Temple at Naray, a small town near Abbottabad.

iv) St. Luke’s Church, representing Christian religious building located in Abbottabd.

v) Lockheart house, Govt. owned building of colonial era once residence of Gen Sir William Lockhart (1841-1900) built and completed around 1880 and now marked for demolition by the Cantt Board and Military Estate Office.

vi) Privately owned ancient Hindu house in Nawan Shehr (built in 1906).

Primary data was collected from representatives of the concerned departments and institutions responsible or engaged in the management of the cultural heritage (Auqaf, Evacuee Trust Property Board, Dices of Peshawar), representative of the local government, custodians, tenants or occupants of the sites of cultural significance (Lockhart House, Sikh Gurdwara and Old Hindu Temple) and experts of archeology. Purposive sampling method was used for the data collection and in depth interviews were conducted. Personal observation of the sites helped a great deal to evaluate the level of maintenance and preservation of the culture sites. Secondary data was collected from the published reports and institutional documents. Institutional documents refer to the written material and other documents from organizational records, official publications and reports, artistic works, and written responses to open-ended surveys that were provided by the concerned departments during visit to these offices. The authenticity of these institutional documents was verified by the officials of these departments. National and international charters, acts and policies were compared with the on ground procedures of managing the cultural resources and prevailing gaps in policy and procedures were analyzed in detail.

3. Results and Discussions

Although a complete mechanism is chalked out about the identification, acquisition, preservation, restoration, maintenance and management of the cultural property in the Antiques act of 2016 but gaps, both in the policy and procedures, can be observed that result in poor management of cultural resources.

3.1. The Process of Identifying Cultural Heritage: Local vs. International Practices

The first step of safeguarding the cultural heritage starts with what any nation, state or community considers as cultural asset, resource or heritage. What laws,

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1 Naray is a local word of Hindko language meaning water springs. The temple had two water bodies along with bath rooms built on naturally flowing water of the springs. Separate bath rooms and water bodies were available for washing and ablution of male and female pilgrims. The womens’ pond is dried up and water is used for domestic supply for locals while mens’ pond and bath rooms are still in working condition. The temple along with the guest house (Gita Bhawan) and water bodies served as the prime destination for the Hindu Pilgrims. Hazara Gazeteer of 1884-85 mentioned that the site was one of the biggest annual Hindu gatherings in the region.

policies and procedures are chalked out to identify and classify these cultural resources and which institutions are responsible for taking out these tasks from identification to management. Chapter II of KPK Antique Act, 2016 mentions in section four that Conservation Heritage Board, responsible to provide technical assistance to the Department of Archeology and Museums of Govt. of KP, will advise all major interventions for the protection of built heritage in the light of international best practices. The Bura Charter (2013) of International Council on Monuments and Site (ICOMOS) provides guidance for the conservation and management of places of cultural significance. Since its first draft in 1979, the charter has been adopted as a reference for best international practices for the conservation of cultural heritage worldwide. Elaborated in section 1.2 of article 1 of the charter, cultural significance means ‘aesthetic, historic, scientific, social or spiritual value for past, present or future generations’ (The Burra Charter, 2013:p, 2). This definition scales cultural heritage in terms of ‘impact’ and quantizes the impact according to the intensity and significance of that particular social, cultural, historical, or religious connectedness. The conceptualization of cultural heritage, at the very outset, affects the appropriateness of policy framework for preservation. The Burra Charter diversifies the term ‘cultural heritage’ in real-time, with no time constraints, which makes the recognition procedure responsive to the abstract academic potential attached with the material in form of emotion, culture, history or polity, and consequently determines the inevitableness of extensive precision in the whole process of preservation.

At no place, the charter puts limitation of age (as against the Antique’s Act of KP) with the cultural heritage. This significance of a place can be understood by a sequence of collecting and analyzing information before declaring a sight as cultural heritage. The ambiguity in what to consider as cultural heritage and absence of clear distinction between cultural heritage and antiquity in KP Antiques Act has resulted in lack of clarity in the identification process of built heritage. Furthermore, the confusion is translated institutional overlap between various departments responsible for preservation, primarily due to the absence of a concrete mechanism to recognize, classify, and preserve the heritage under a consolidated definition.

Khyber Pakhtunkhwa Antiquities Act, 2016 defines cultural property as any product of human activity that holds cultural, historical, social, religious, architectural, ethnographical, anthropological, military or scientific significant. The details of such elements of cultural property include both moveable and immovable property and any other object or class of such things declared by government through notification in the official Gazette. The sub clauses (b) and (d) further make distinctions between cultural property and antiquity where any such cultural property may be considered as antique if it “has been in existence for a period of not less than one hundred year” (Khyber Pakhtunkhwa Antiquities Act, 2016: P, 1). But in all the subsequent references, where the procedures for acquisition, preservation or maintenance of heritage are laid out, the word antiquity is used instead of cultural property. This leaves great ambiguity that if any product of human activity, not older than one hundred years will be
considered as cultural heritage or not. For example, Meenar-e-Pakistan is a monument constructed to symbolize political declaration of 1940 which culminated in emergence of Pakistan, but despite having immense political and historical value, the monument is excluded to be considered as cultural heritage as per defined by the said act. The very name of the act, ‘Antique act 1975’ and then ‘Antique act of 2016’ is misleading. Oxford dictionary defines antique as ‘a collectable object such as a piece of furniture or work of art that has a high value because of its age and quality’. Although the word quality refers to all those cultural, historical, social, religious, architectural, ethnographical, anthropological, military, secular or scientific dimensions, the necessity of age (at least hundred years in case of Khyber Pakhtunkhwa Antiquities Act, 2016) puts a limitation. The same hundred years limitation was used in Antiques Act, 1975 which simply means a cultural property of great significance that may not have qualified to be considered as a cultural property in 1975, could have been left for all sorts of hazards that either vanished till 2016 or considered as cultural heritage in a much worse condition.

Understanding Significance of Cultural Heritage

Sub clause (d) of clause 2 of chapter 1 of the act clearly defines that “cultural property means (any product of human activity) which on religious, spiritual, secular or material grounds is specifically designated as being of importance for archaeology, prehistory, history, literature, art or science and may belong to any categories ....” (p, 2). This may mean that buildings of religious significance e.g. Gurdwaras, Temples, Churches etc may be considered as important aspects of cultural heritage. This is particularly true as after the partition of Indo-Pak in 1947, these places are not actively used as places of worship due to migration of majority of Hindus, Sikhs and Christians. As Lennon (2000:P, 448) defined, “the cultural heritage embraces all the signs that document human activities over time”, preserving these religious symbols of the past that show the history of this particular region could help younger generations understand the history of this region. None of the buildings of religious significance in the study area is identified as cultural heritage by Directorate of archeology and Museums. Same is the case with Lockheart house and private banglows and houses that otherwise hold immense significance from cultural perspective. The implications of the neglect may not be academic only but also tend to be social and behavioral due to the deviation from ingrained diversity in cultural history of this area. The disconnect narrows down the assimilative tendency of the current inhabitants. The ignorance from the contributions by their predecessors representing different ethnic and religious identities results social self-centeredness which may lead to intolerance. The policy construct of Burra Charter, on contrary, envisioned culture and heritage as trickle-down channels to dispense historical realities objectively to the coming generations in accordance with the principle of” inter-generational equity” by setting “a standard of practice” with clear goals and procedures (The Burra Charter, 2013; p, 2).

3.2. State Institutions Responsible for the Management of Cultural Heritage in Theory and Practice

Traditionally the identification, preservation, maintenance etc of the cultural heritage was responsibility of the federal government of Pakistan where directorate of archeology was authorized to carry all such activities under Antiques Act, 1975 (Antique Act, 1975). After 18th constitutional amendment, the archeology and museums department has been devolved to provinces. Khyber Pakhtunkhwa Antiques Act, 2016 empowers Directorate of Archeology and Museum, Khyber Pakhtunkhwa to protect, preserve, develop and maintain the antiquities of the province (KP Antique Act, 2016). KP Antiques Act, 2016 is a comprehensive document providing some basic definitions and addressing different dimensions of preservation of cultural heritage and antiquity.

Table 3.1. Cultural Heritage and Current Custodians in Abbottabad Districts

<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Nature of Cultural Property in Abbottabad</th>
<th>Present Custodian of the Buildings</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Gurdwara in Abbottabad City</td>
<td>Evacuee Trust Property Board, Ministry of Religious Affairs &amp; Inter Faith Harmony, Federal Govt.</td>
</tr>
<tr>
<td>2</td>
<td>Mandir in Nawan Shehr</td>
<td>Local Government</td>
</tr>
<tr>
<td>3</td>
<td>St. Luke's Church Abbottabad</td>
<td>Diocese of Peshawar</td>
</tr>
<tr>
<td>4</td>
<td>Lockheart House</td>
<td>Cantonment Board Abbottabad</td>
</tr>
<tr>
<td>5</td>
<td>Ancient House in Nawan Shehr</td>
<td>Privately owned</td>
</tr>
<tr>
<td>5</td>
<td>Ilyasi Mosque</td>
<td>Controlled by local community</td>
</tr>
</tbody>
</table>

Evacuee Trust Property Board is a Government Department working under federal Ministry of Religious Affairs & Inter Faith Harmony Islamabad and administers evacuee properties attached to educational, charitable or religious trusts left behind by Hindus & Sikhs who migrated to India after partition. It also maintains and upkeeps places of worship belonging to Hindus and Sikhs. Evacuee trust properties (management and disposal) act 1975 is used for the identification of the built heritage of religious affiliation for Sikhs and Hindus. Evacuee Trust Property Board is responsible for the management and disposal of evacuee trust property. The Board has the power to acquire, hold and dispose off property, both tangible and intangible. Declaration of any property as evacuee trust property is done by the chairmen and this is not challengeable in the court. After the declaration of the chairmen the government is supposed to notify the property as evacuee trust property. Board is responsible for the proper management, maintenance and disposal of such property.

Similarly KPK Waqf Properties Ordinance, 1979 is used to declare the heritage sites which are related to Muslims. Waqf property means property of any kind permanently dedicated by a person professing Islam for any purpose recognized by Islam as religious, pious or charitable. Chief Administrator of Auqaf for the Khyber Pakhtunkhwa is responsible for the management of Waqf property.
3.3. Preservation and Promotion of Cultural Heritage

If we look towards the practice of the management policy surely we could see the loopholes in it, one of the major loophole lies in the identification process of heritage sites, as according to the KPK Waqf Properties Ordinance 1979 and Evacuee Trust Properties (Management and Disposal) Act 1975 the chairman or administrator can only declare any site as heritage if they will have such information about any new identified site or anyone have shared information about heritage sites. Although a two way process where identification can be done either by the community or by the chairman, the process doesn’t seem to have worked effectively as not many heritage sites or artifacts could be identified in the province. Once identified, for conservation, restoration, protection and promotion of cultural heritage of the Province, Conservation Heritage Board was established headed by the director and includes archaeologists, architects, engineers, conservationists, historians, artists, managers of cultural heritage as members of the board. The board is supposed to advise the Directorate on all major interventions in the built heritage and is responsible for the execution of best international practices in the preservation of the cultural heritage. The Committee is supposed to review the list of antiquities annually and make suitable recommendations to include any identified antiquity as protected antiquity.

3.3.1. Preservation of a Protected Heritage Site and Public Access

The owner of a protected antiquity is not allowed to make any alteration or even renovate the protected antiquity. If such a protected heritage site needs immediate preservation or renovation, the owner is requested to renovate the building in writing by the director and a proper time frame for such a modification is also given. In case, the owner fails to do so in given time, the board has the authority to take control of such preservation/renovation and the expenses incurred are recovered as arrears in land revenue. In extreme cases, where extreme threat to the antiquity is feared, the board may take the custody of the heritage site or antiquity. The Director may ask the owner of protected antiquity to report on the existing state of the heritage site, its repairs or of the preservation of the site and its surroundings.

The Act also noted that any place of worship or shrine even if it falls in the category of cultural heritage, will not be used for any purpose inconsistent with its character. Government will be responsible to remove all encroachments in the close vicinity of the antiquity and land will be acquired under the Land Acquisition Act, 1894. Furthermore, no development plan or scheme will be executed within a distance of two hundred feet of a protected immovable antiquity except with the approval of the Directorate. The owner of the antiquity is allowed to open the heritage site for general public to visit and is allowed to receive an agreed upon amount as visitors ticket. The timings and fair to be charged as ticket has to be decided mutually by the owner, custodian or custodial body with the director of the board.
3.3.2. Existing Status of Built Heritage

Although the documented policy seems to be quite comprehensive, but it’s the implementation that requires lots of improvements. The shortcomings in the management of cultural heritage are evident right from the documentation or identification of cultural heritage. Although as far as Act is concerned, the identification of cultural heritage is a two-way process that can be initiated either from the community or from the archaeological department. But lack of ownership and awareness from local community or mistrust from the owner or custodian or cultural antiquity results in no reporting of cultural heritage from community. The archaeological department seems to be suffering from understaffing and lack or absence of physical presence in the city of Abbottabad resulted in no new identification of cultural artifacts since the Act was passed. According to the act of transference of built heritage, only those buildings were considered as heritages which were 100 years old at that time. No further inclusion has been made in cultural heritage onwards. This has neglected a number of constructions that could be saved from deterioration if were documented. This negligence is evident from the undocumented buildings of cultural significance in Abbottabad that reached to an age of 100 years in 2020. According to management policy of built heritage, the documented constructions must be preserved and managed. Such practice has not been observed as evident from the deteriorated condition of Gurdawara in Gurdawara Gali, Abbottabad and Temple of Nawan shehr.

The policy document clearly outlines that antiquity of religious significance can not be used for any other purpose but for religious ceremonies. Commercial use of Gurdawara in Gurdawara Gali, Abbottabad is a clear violation of policy. Although the main hall of Gurdawara is closed and is in abysmal condition by itself, the corridor that leads to the entrance of the main prayer hall is rented out and is actively used for commercial purpose without any consideration of preserving it in its original condition. Same is true for the Jain Mandir also present in the same street, that has been rented out to educational department for primary school. During the interview, the head master of the school himself narrated the changes made in the original building to facilitate the more space for ever increasing children attending the school. All this goes unnoticed by the archaeological department indicating clear short coming either in policy or implementation of the procedures chalked out in the document. But when it comes to religious buildings, Waqf Property Ordinance is there to manage Muslim heritage, whereas, Evacuee Trust Property Management and Disposal Act 1975 manages Hindu constructions. However, the property that belongs to Christians is taken care by Antique Act 2016.

3.4. Role of Community and Local Government in Management of Cultural Heritage

The Act. authorizes the district governments to take all possible measures to protect, preserve and promote the culture heritage of the province. The District Government facilitated by Departments of Sports, Culture, Tourism,
Archaeology, and Museums & Youth Affairs will undertake the management, conservation and promotion of the cultural heritage located within their jurisdiction. The District Government was also to allocate sufficient funds for protection, conservation, restoration, rehabilitation and promotion of such antiquities. In case of Abbottabad, the office of Deputy Commissioner does hold a record of buildings of cultural significance. The document was actually prepared by some active members of local community and later on shared with the government office for preservation of these sites but no further work could be done due to lack of funds that had to be allocated for the specific job as prescribed in the policy document. Such government offices also lack the desired expertise to identify, protect preserve or promote these resources of cultural significance.

Local governments were given the task of complete documentation and other measures needed to keep the public fully and correctly informed of the well-known archaeological or historical sites. Although this could have been an ideal scenario for the preservation of cultural heritage as local communities would be well aware of what is significant cultural artifact to be preserved for generations to come, but unfortunately, no work could be done by these bodies due to lack of any foundations to be built upon. No initiative was taken in this direction either due to many other issue of gravity to be taken care of by local governments. The relatively new setup governance structure of the local bodies was altogether new, although paused an additional constraint for the management of cultural heritage that was already an issue of less significance.

4. Conclusion

From defining perimeters of definition to the formulation of conceptual framework and policy guidelines for preservation and implementation mechanism, safeguarding cultural resources of built heritage is a comprehensive process. The comparative study of Burra Charter and KPK antiquity act reveals few contradictions, in definition formats and departmental execution mechanisms. The by-laws for heritage’s preservation in KPK need to be revamped in accordance with international standards set by ICOMOS (International Council on Monuments and Sites). Currently, the philosophy, terminology and methodology used to identify and classify cultural monuments follow mix Standard Operating Procedures, lack clearly demarcated line of action to avoid departmental over-lap in discharge of duty, as observed in the subject case study. The conceptual framework of the policy defines heritage without paying heed to the tangible and intangible repercussions of the disconnect, as it happens in this case, in transmission of historical heritage to coming generations as an integral part of academics and human rights. The KPK Antiquity Act less emphasizes over normative justification for heritage preservation, as compared to the Burra Charter 2013. Six departments, governed by different legal scopes and procedures, are administering cultural sites mentioned in the case study with no systematic consultation. Institutional duplicity lead to aggravated state of affairs in preservation and projection of these sites. Declaration, preservation and projection follows multi-channeled,
top-down approach in KPK, which can be transformed into more delegated and participative methodology under one central policy, as envisioned in international preservation documents, to encapsulate religious, intellectual, cultural, and emotional value attached to these valuable sites comprehensively.

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