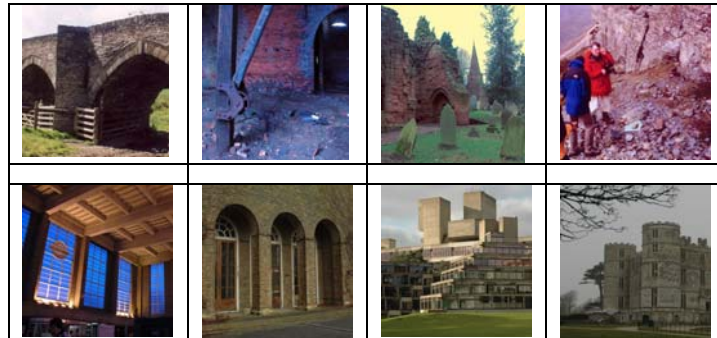# HERITAGE PROTECTION REVIEW

Assessment of eight pilot projects for the Department for Culture, Media and Sport

Cornish Bridges, Milestones and Wayside Crosses
Darnall Works Sheffield
Kenilworth Castle, Abbey and associated landscapes
Langdale prehistoric axe-factories
London Underground Piccadilly line stations
RAF Scampton
University of East Anglia
The Weld Estate

Historic Environment Conservation
April 2006

Preface

1   This report was commissioned by the Architecture and Historic Environment Division of the Department for Culture Media and Sport. The Division required an independent assessment of eight pilot projects undertaken by English Heritage as part of the Heritage Protection Review.

2   The assessment was based upon the documentation for the eight pilots in the form of Historic Asset Records and Heritage Partnership Agreements, together with the views of partners and consultee stakeholders on the processes involved and the results obtained.

3   I am grateful to all those owners, local authority staff, English Heritage staff, amenity societies and others who gave of their time and expertise in responding to questions and participating in interviews.

David Baker
Historic Environment Conservation
April 2006

AN ASSESSMENT OF EIGHT PILOT PROJECTS FOR THE HERITAGE PROTECTION REVIEW

GLOSSARY OF PRINCIPAL ACRONYMS

AONB	Area of Outstanding Natural Beauty
ARCUS	Archaeological Research & Consultancy at the University of Sheffield
CCC	Cornwall County Council
CCT	Closed Circuit Television
CDS	Conservation Development Strategy (UEA)
CRO	County Record Office
CROW	Countryside and Rights of Way Act 2000
DCMS	Department for Culture Media and Sport
DDA	Disability Discrimination Act 1995
Defra	Department for Environment Food and Rural Affairs
EDP	Establishment Development Plan (RAF Scampton)
EH	English Heritage
ESA	Environmentally Sensitive Area
FMW	Field Monument Warden
GHEU	Government Heritage Estates Unit
GIS	Geographical Information System
GLSMR	Greater London Sites and Monuments Record
GPS	Global Positioning System
HAR	Historic Asset Record
HCA	Heritage Consent Approval
HER	Historic Environment Record
HLF	Heritage Lottery Fund
HPA	Heritage Partnership Agreement
HPD	Heritage Protection Division
HPR	Heritage Protection Review
IAM	Inspector of Ancient Monuments
Infracos	The infrastructure companies managing London Underground lines etc
LBC	Listed Building Consent
LPA	Local Planning Authority
LUL	London Underground Ltd
MoD	Ministry of Defence
MPP	Monuments Protection Programme
NCC	Norwich District Council
NCDC	North Cornwall District Council
NMR	National Monuments Record
P&D	English Heritage Planning and Development
PPG	Planning Policy Guidance
PPP	Public Private Partnership
RHSBE	Register of Historic Sites and Buildings for England
SCC	Sheffield City Council
SMC	Scheduled Monument Consent
SSSI	Site of Special Scientific Interest
SYAS	South Yorkshire Archaeology Service
UEA	University of East Anglia

Mapping extracts supplied by English Heritage

Executive Summary

1   The Heritage Protection Review proposes a new unified Register of historic assets, a unified consent regime and the introduction of statutory Heritage Partnership Agreements (HPAs). Their purpose is to bring together and coordinate the intentions of separately evolved controls in order to provide a more coordinated, cooperative and informed approach to conservation management between owners and regulators. HPAs are intended to simplify the management of suitable historic sites and groups of assets, by pre-agreeing certain classes of relatively simple repairs and works that currently have to go through disproportionately complicated and time-consuming bureaucratic processes.

2   Eight pilot projects were selected by English Heritage for assessment from thirty-two identified as a good test of the range of situations that might benefit from HPR reforms. These are Cornish Bridges, Milestones and Wayside Crosses; Darnall Works, Sheffield; Kenilworth Castle, Abbey and associated sites; Langdale prehistoric axe-factories; London Underground Piccadilly Line northern extension stations; RAF Scampton; the University of East Anglia; and the Weld Estate in south Dorset. At the time of assessment all the pilots were to some extent still 'live', with iterations of documentation still being produced.

3   The project assessed the Historic Asset Records and Register Entries prepared for the selected pilots and compared them with existing documentation. Though that produced recently by the systematic Monuments Protection Programme and through compilation of Registers (Parks & Gardens, Battlefields) relates well to the objectives of the Heritage Protection Review, the new documentation is generally more informative and interesting; it makes clear why the asset has been designated; the associated digital mapping is a great improvement in certainty and clarity. Work needs to be done on ensuring that the written information is presented in a sequence that a range of non-specialist users will find most helpful. Controlling the resource demands of the new approach will require a systematic approach to referencing more extensive material in supporting national and local records systems.

4   The project also assessed the draft Heritage Partnership Agreements (HPAs),
       usually between the owner(s), the local authority and English Heritage,
       comprising administrative information including the Historic Asset Records, a
       conservation framework tailored to the particular site, and specifically agreed
       types of works. In some cases mapping indicates different levels of control in
       different parts of the site; in others, tables or 'traffic lights' relate types of works
       to particular historic assets. These agreements can only really be assessed through
       practical operational outcomes, but the initial reactions of partners indicate that
       they are dealing with the central issues.

5   The project interviewed partners and stakeholders in order to assess their views on
       the objectives of HPAs and the means proposed to achieve them. In all cases there
       was support for the principle, though in some it was felt that existing arrangements
       if properly resourced could deliver similar results. Perceived obstacles tended to
       reflect the complex agendas that can be involved in conservation management
       rather than intrinsic difficulties with the new process.

6   The project was required to assess the benefits and disbenefits of HPAs compared
       with existing arrangements, in terms of resources saved and operational
       relationships improved. This required a certain amount of crystal ball gazing: the
       relevant legislation is not yet in place; the pilot projects unfortunately coincided
       with a major English Heritage reorganisation; the issue of local authority capacity
       is a complicating factor.

7   Calculating whether resources would be saved is not for the tidy-minded, because
       there are too many variables. These include whether the same extent and type of
       designation applied in the old and new situations, and whether the local authorities
       were sufficiently well resourced to enforce the old processes that would be
       simplified under the new arrangements. However, all the pilots suggested that
       overall there would be at worst no greater cost to a properly run system, and in
       many cases significant savings on doing what was (or should have been) done.

8   Calculating whether relationships would be improved is a softer exercise but
       nonetheless an important part of making conservation management a partnership

activity rather than something remote authority does to often puzzled owners. In all pilots, partners were at worst neutral and most owners were positive, seeing advantages in the arrangements and wanting to get involved. There can be problematic areas where owners may have perceived an HPA as a useful thin end of a wedge towards getting greater freedom from controls, and where collisions between detailed considerations and management-driven overviews had not been satisfactorily articulated or resolved.

9   Taking an impressionistic overall view of resources and relationships, there is clearly some advantage to be gained from the right HPAs for the right historic assets with positive-minded partners properly engaged. It will not be a revolution, because, as the pilots have shown, in several places, existing legislation allows some of the arrangements that would now become more central to conservation management. But sight must not be lost of the basic point that the Heritage Protection Review and its HPAs are substantially about bringing conservation management nearer to those who are mostly closely affected and interested in it.

10   By restricting English Heritage's 'normal' involvement to Grade I assets (under the new designations), and making local authorities the gateway for planning controls generally, the new system will put pressure on local authorities to ensure they have access to the right expertise. The pilots show that a few are well equipped to respond, but that others need or are too reliant for the necessary resources upon local priorities and cooperative arrangements in which the facilitation of HPAs would have to be a formal element.

Cornish Bridge (EH)

1 Introduction

Background: existing and proposed arrangements
(*English Heritage* - adapted)

1.1   Historic assets are currently subject to a range of separate control mechanisms. Some designated assets – listed buildings, scheduled ancient monuments and Conservation Areas – require specific consents for specific works affecting them. Other designated assets – registered parks or gardens, registered battlefields and World Heritage Sites – have to be taken into account as a material consideration in the wider planning system when proposed works affect them. Specific consents are also required for particular activities on particular sites, such as metal detecting on Scheduled Monuments or on archaeological sites within Countryside Stewardship agreement land, or the reporting of finds.

1.2   Recent research and consultations have identified drawbacks with the current system of consents. It is perceived by many users as complex, confusing, expensive, inconsistent and slow, and there is a feeling that rationalisation is needed. Formal agreements for the constructive and efficient management of listed building controls on complex sites cannot be implemented without changes to the legal consent process. Landowners and farmers find scheduled monument controls and class consents for ploughing complex and hard to understand; they are too reliant on farmers themselves being able to accurately determine cultivation depths without professional advice. Individual heritage consents often take a long time to process, with only 63% of listed building consent applications determined within the target limit of eight weeks, and scheduled monument consent generally processed within four months.

1.3   For more complex sites with a range of designated assets the process is not only lengthy but complicated and hard to understand. The owner of a site including a listed building and a scheduled monument may have to make up to three separate consent applications, one to the local planning authority for planning permission, one to the local planning authority for listed building consent and one to DCMS for SMC. If the site is also located in a conservation area, there may also be a need for a separate application to the local planning authority for Conservation Area Consent.

1.4   In response to difficulties such as these, and in order to modernise arrangements for protecting the historic environment through the land-use planning system, the Heritage Protection Review has brought forward proposals which include a new unified Register of historic assets, a unified heritage consent (which could not be tested by this project) and the introduction of statutory management agreements for suitable historic sites.

1.5   The new unified Register of Historic Sites and Buildings of England (RHSBE) will bring together the schedule of ancient monuments, listed buildings, registered parks and gardens, registered battlefields and World Heritage Sites. The register will be complemented by local designations that will include conservation areas. English Heritage will compile the national Register, and local authorities will be responsible for local designation.

1.6   English Heritage considers that the proposed Register will provide:

(a) a consistent approach to designating historic sites and assets, and eliminate the confusion of multiple designation of an asset;

(b) a holistic understanding of assets, by describing them in their context with the wider site, for example, a building, currently listed, within the curtilage of a registered garden;

(c) a simpler designation process, easier to administer and easier to understand;

(d) improved public access to information about the historic environment by bringing together several records;

(e) easier implementation of a unified heritage consent regime;

(f) improved local delivery of historic environment services by encouraging greater joint-working between authorities.

1.7 Heritage Partnership Agreements (HPAs) are a development of management agreements that are possible under existing legislation. Rather than a financial consideration in return for an agreed management regime, they offer a simplification of the administration of statutory controls, by providing pre-agreement on how various classes of mostly minor works will be carried out, thus removing the need for a long series of individual specific consents. They are primarily intended for large scale buildings, sites and landscapes, complex historic entities that comprise more than one type of asset, assets that are better managed alongside other regimes (e.g. in the natural environment) and assets of a similar type in single ownership but dispersed locations.

1.8 HPAs are intended to promote:

(a) effective partnership between owners, managers, local authorities, English Heritage and other interested parties' when deciding on works to be carried out to a historic site;

(b) positive long-term proactive strategic management of historic sites by agreeing

planned works normally requiring consent, enabling effective forward planning for example, in the application of grants;

(c) complementary management with other parallel regimes, (e.g. with agri-environment/class consent schemes; World Heritage Site agreements);

(d) enhanced certainty and clarity on works requiring heritage consent; method and materials used in works;

(e) elimination for the need for close regulation for defined categories of change;

(f) reduction in time and administrative burden by means of prior consent agreement for those who would otherwise apply and process consent applications.

1.9 In this study, assessment of the Register and related designation processes is limited to the Historic Asset Records compiled for the pilot schemes considered below. The main task is to review the Heritage Partnership Agreements. Both, however, can be considered in terms of the aims described in 1.6 and 1.8 above.

The Brief for assessing the pilots.

1.10 The aims of this project are to:

(a) outline the existing system of heritage protection system operating in English Heritage pilot areas and identify practical problems with it;

(b) review the progress made by the English Heritage pilot projects towards delivering the new designations and new management arrangements for historic sites as identified in the recommendations of the Heritage Protection Review, and identify the costs involved in delivering them;

(c) investigate the likely impact of the new arrangements on future management of the pilot sites, including an assessment of likely cost-benefits;

(d) explore experiences of partners and other stakeholders in developing and managing pilots;

(e) make recommendations on the applicability of pilot project arrangements for other historic sites.

1.11 The Brief envisaged a three-stage process. **Stage 1** was a desk-based overview of activity, leading to a status report for each pilot to a common format. **Stage 2** was structured interviews with key stakeholders leading to an assessment report on their views about process and outcome for each pilot. **Stage 3** was a final evaluation report as an overall assessment of the eight pilot projects, using the desk-based research and stakeholder interviews. In practice, similar ground was covered by the research on the new designation documentation and the HPAs and by the structured interviews, so the results were combined in a single draft report *Heritage Protection Agreements – Assessment of documentation and narrative of stakeholder views*.

1.12 That document is the more detailed basis for this report. The Brief requires it to draw conclusions on:

(a) the perceived benefits to stakeholders of new-style designations;

(b) the likely cost-benefits to stakeholders of new statutory management agreements;

(c) general perceptions of the pilot process among stakeholders;

(d) the characteristics of a successful pilot project, where stakeholders are positive about both process and outcomes.

(a) – (c) are covered by both reports and summarised in Section 6 below. (d) is discussed in Sections 5.46 – 5.53 below.

1.13 The pilots were devised by English Heritage in order to test three key components of the proposed new Register (RHSBE):

(a) new-style **Historic Asset Records** (HARs) expressed as entries on the Register, singly, or in groups under a common Register Entry, as appropriate;

(b) **mapping** associated with Register Entries, showing coloured zones for different kinds of proposed regulation;

(c) **Heritage Partnership Agreements** based on the Register Entries and their mapping, aiming to improve heritage management by agreeing certain works in advance. HPAs are selective and optional.

1.14 Though the HPAs are intended as a test of the Register, they are also freestanding devices in their own right. It was clarified at the outset of this project that the assessment would cover these three components, and the wider Heritage Protection Review insofar as they are part of it, but not the whole HPR itself.

Methods

1.15 Copies of the new Historic Asset Records and Register Entries were supplied and sufficient existing designation documents were obtained to make comparisons. A few revised descriptions were received in the course of the work. The HPAs were mostly in the final stages of negotiations during the lifetime of the project; seven of the eight were available.

1.16 Interviews were held with all the main partners, in each case the asset owner, the local planning authority and English Heritage staff for designation and casework. Some amenity societies and

county archaeologists were also contacted. Time factors prevented a wider consultation of less directly involved local interests

1.17 The first report has eight sections, one for each pilot, each in a common format.

(a) **1 The pilot site**: overall character and aspects of conservation management tested; assets included; partners and consultees;

(b) **2 The existing heritage protection system**: controls and regulators; consents 2001 – 2005; drawbacks of the existing management and consent systems;

(c) **3 Historic Asset Records:** assessment of Historic Asset Records and Register Entries; comparison of existing and proposed documentation; challenges in drafting and defining; time and organisational costs of preparation;

(d) **4 Heritage Partnership Agreement**: type of agreement and progress towards drawing up; the quality of the statutory management agreement; organisational roles and challenges in development; consultation process in development; time and organisational cost of development; benefits and disadvantages.

(e) **5 Project assessment**: overall management of the pilot project; partner relationships; relative effectiveness of new processes; potential savings of time and costs; other observations.

1.18 DCMS itself was not involved in the pilot projects themselves except as commissioners of this assessment study, and, of course, as part of the existing regulatory machinery against which the new arrangements were being tested.

RAF Scampton: C – type hangar, 1936   (DB)

2 The pilot schemes

The full range

2.1 Eight pilots were assessed for this report, selected from thirty-two which have been completed, are currently active or were not completed. The full set was deliberately chosen to test a wide range of circumstances and thereby provide guidance on where HPAs might be most suitable.

2.2 Fifteen of the twenty-four were not completed. They included the Byker Estate Newcastle upon Tyne, Hadrian's Wall, Fylingdale Moor, Duke Street Liverpool, the Yorkshire Dales, Cambridgeshire barrows, Foulness Essex, Northamptonshire battlefields, Ravensdale Deer Park Derbyshire, Bletchley Park, Boundary Street Estate London, Halesowen Abbey West Midlands, Mount House Shrewsbury, Shuckborough Estate ridge & furrow Warwickshire, and Woodlands School Coventry.

2.3 Reasons for non-completion were often multiple. Lack of resources in the Heritage Protection Division was a factor in six cases, though partners supported the idea in three of them. Partner reluctance was a factor in three cases. In six cases what had been identified proved to be unsuitable for one reason or another. Timing was a difficulty in four cases.

2.4 Nine other current pilots not forming part of this assessment are Arnos Vale Cemetery Bristol, Bindon Estate Dorset, Centre Point London, Fursdon Estate Devon, Godolphin Estate Cornwall, Holkham House Norfolk, Itchen Valley Country Park Water Meadows, Foxton Locks Leicestershire, and York City Walls.

The selected pilots: assets and issues

2.5 Of the eight pilots chosen for this assessment, all are approaching

completion except one, whose outcome was uncertain at 28 February 2006. For the characteristics of each pilot in terms of *asset type*, *period*, *designations*, *owner*, and *pilot type* refer to the tables at 2.30 – 2.31 below.

2.6 **Cornish Bridges, Milestones and Wayside Crosses** were sampled in a group of nine adjoining parishes in North Cornwall District. They include medieval and later single and multi-span bridges, 'clapper' bridges often located on packhorse routes and ranging in date from the medieval period to the C19, post and lintel bridges of the C19, mediaeval wayside crosses, C18 Launceston Turnpike and C19 Telford milestones.

2.7 Owners are Cornwall County Council Planning Transportation and Estates Department which has an arms-length direct labour organisation CORMAC and receives advice from its Historic Environment Service. The local planning authority is North Cornwall District Council whose Conservation Officer is also advised by the County Council's HES. English Heritage Regional staff are based in Bristol and DCMS in London.

2.8 Cornish Bridges, Milestones and Wayside Crosses are of relevance and interest for the assessment because:

(a) they are asset types that today are partly relict and partly in use and they challenge the traditional perception that 'useful' structures are listed and 'useless' ones scheduled as ancient monuments

(b) they are assets in public use and on publicly owned land

(c) they test the scope for managing a set of discrete and dispersed assets of similar type as distinct from either a discretely

Cornish Bridges etc: Launceston Turnpike Milestone (EH)

located asset or all the assets in a wider area such as an historic estate

(d) they test Heritage Partnership Agreements with public authorities as owners of historic assets

(e) as a sample they are believed to be characteristic of not only the wider District but also of the other Districts in Cornwall, and possibly even of similar structures elsewhere.
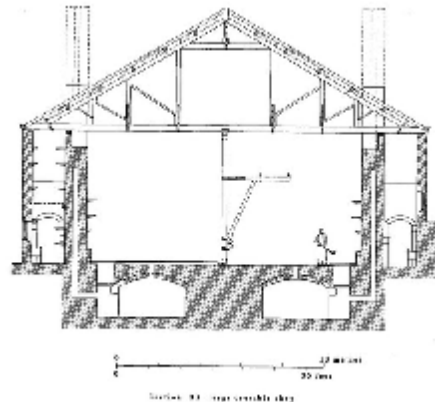
2.9   The **Darnall Works** is the site of a large-scale crucible steelworks, unique in Britain, and the last extant such site in Sheffield. It includes crucible shops and ancillary rooms as well as offices. The site was originally developed in 1835 for Sanderson Brothers, and rebuilt in 1871-2 with increased capacity. In 1960 the works combined with the adjacent site when Kayser Ellison merged with Sandersons to form Sanderson Kayser. The site includes the Kayser Ellison works, previously occupied in part by Don Glass Works and Aqueduct Brick Yard.

2.10   Owners are Darnall Works Ltd and Mayflower Technology Ltd. The local planning authority is Sheffield City Council whose Conservation Officer is also advised by the South Yorkshire Archaeology Service. English Heritage Regional staff are based in York and DCMS in London.

2.11   Darnall Steelworks is of relevance and interest for the assessment because:

(a) their significance has been brought out by successive resurveys and industrial archaeological surveys of the 1990s, enhancing the importance of Darnall, including the possibility of technology being borrowed from glass to steel

(b) it tests the application of the HPA concept and procedures to industrial archaeological assets

Darnall Works: section through large crucible shop (EH)

(c) it tests whether an HPA can help sympathetic industrialist owners deal with heritage obligations in the context of fluctuating economic circumstances, together with the role of an HPA on a regeneration site where the owner is bringing forward development-led proposals, involving public grant-aid, some of which is from English Heritage.
.
2.12   The **Kenilworth Castle** pilot comprises three main elements: the

Castle; Kenilworth Abbey and Abbey Fields together with the Church of Saint Nicholas; and the landscape comprising the moated site of the Pleasance, a fishpond complex and associated landscape features.

2.13 Owners are Kenilworth Town Council for the Castle held in Guardianship by English Heritage (Properties & Outreach), Warwick District Council for the Abbey site, and Mr Henry Lucas for the mere and the Pleasance. The local planning authority is Warwick District Council advised by the Warwickshire County Archaeologist. English Heritage Regional staff are based in Birmingham and DCMS in London.

Kenilworth Castle (DB)

2.14 The Kenilworth group is of relevance and interest for the assessment because:

(a) the HPA land includes a heavily used public site with masonry, problems of vandalism, footpath maintenance, signage, replanting beds and trees

(b) they involve the management interests of three landowners, two public and one private. This raises particular issues of English Heritage being multi-hatted on this site, managing the guardianship castle site, advising DCMS on all scheduled monument consent work and advising Warwick District Council on proposals affecting Grade I and II* listed buildings, as well as undertaking the designation review and this pilot study.

(c) by having to exclude adjacent deer parks as making the pilot too large, they test whether the selected group of assets is actually the best selection

(d) there is strong local interest in the assets and their management

(e) the challenge of defining a holistic approach, reading across decisions from one element of the pilot to another.

2.15 The **Langdale neolithic axe factories** are in the Lake District National Park. Great Langdale and Scafell Pike axe factories make up one of the eight most important non-flint, stone axe production areas of this period. The pilot includes the earthworks, surface and buried remains of over 600 Neolithic stone axe factory sites identified by extensive 1980s field survey, excavation and chance finds. There are at least 330 quarries, shelters, working hollows and related features, including artefact scatters and deposits, the latter at one place 1.7m deep with evidence for fire setting and rough and fine cutting. The pilot site also includes several outlying prehistoric ring cairns and medieval shielings.

2.16 Owners are the National Trust as long lessees, and the local planning authority is the Lake District National Park, both of which have specialist archaeological staff. English Heritage Regional staff are based in Manchester and DCMS is in London.

Langdale axe-factory sites (EH)

2.17   Langdale is of relevance and interest for the assessment because:

(a) it represents an opportunity to build up partnerships with both the landowner and the regulator in determining an approach to the integrated management of sites increasingly under pressure from leisure activities

(b) of the relationship between the management of archaeological sites and settlement at a landscape scale and the continuing economic difficulties of upland farming, with complex grazing rights on the uplands, some freehold tied to farms, some leasehold bought in.

(c) the land is owned by a national private conservation organisation and regulated by a local planning authority whose area is defined by its amenity and potential for public access and enjoyment

Langdale axe-factory sites (EH)

(d) it is an upland undesignated prehistoric landscape containing discrete

sites of past human activity and areas with potential for others to have survived, historic assets vulnerable to erosion and damage but difficult of access

(e) it contains nationally important remains inappropriate for management under the strict scheduled monument consent regime; the proposed management agreement is effectively the recommended approach when the sites were turned down for scheduling in the 1980s.

2.18   A group of **London Underground stations** on the northern extension of the Piccadilly Line were designed in the 1920s and 1930s by Charles Holden in a distinctive functional modernist style. The pilot includes Southgate and Turnpike Lane together with another Holden station further south, Piccadilly Circus.

London Underground: Oakwood Station (DB)

2.19   Owners are London Underground Ltd supported by the Infracos Tube Lines and Metronet. The local planning authorities are the London Boroughs of Enfield and Haringey and the City of

Westminster who have Conservation Officers. The London Division of English Heritage has a referral role.

2.20   The stations are of relevance and interest for the assessment because:

(a) they are a single built asset-type spread over several sites

(b) they test the usefulness of an HPA in managing conservation of heavily used asset with a high public domain profile

(c) they involve a management agreement dealing with routine repairs by sub-contractors

2.21   RAF Scampton was an inter-War expansion period built on the cleared site of a First World War Home Defence and training station. As a bomber airfield of the Second World War, it was notable as the base for the 'Dam Busters' of 617 Squadron. Later it was one of ten post-War V-bomber bases. The Roman Ermine Street crosses its eastern side and the perimeter contains a Roman villa site with early Saxon Christian burials.

2.22   Owners are the Ministry of Defence operating through Defence Estates which employs an archaeologist. The local planning authority for notifications / applications is West Lindsey District Council advised by the Lincolnshire County Archaeologist. English Heritage Regional staff are based in Northampton but the principal contact is the Government Historic Environment Unit based in London.

2.23   RAF Scampton is of relevance and interest for the assessment because:

(a) the pilot site is defined by administrative issues, since the complexities of managing historic assets on a sensitive military site make it sensible to deal with all assets rather than just those of the predominant site use

(b) the historic assets are publicly owned but not publicly accessible

RAF Scampton: Station Headquarters (DB)

(c) the historic assets are managed by organisations subject to military discipline and control rather than answerable to elected committees

(d) it deals with the management of a site selected for one period of assets but also containing other periods of assets.

2.24   At the **University of East Anglia** 1965-1968 the architect Denys Lasdun completed ten blocks of 'ziggurats' including Norfolk and Suffolk Terrace, the first section of the library and a substantial part of the Teaching Wall and the elevated walkways linking buildings and facilities.

UEA: the ziggurats (DB)

2.25 Owners are the University of East Anglia and the local planning authority is Norwich City Council which has conservation staff. English Heritage Regional staff are based in Cambridge.

2.26 The buildings at UEA are of relevance and interest for the assessment because:

(a) they comprise listed buildings and an undesignated landscape setting

(b) they are historic assets that are widely accessible to large numbers of direct users and visitors

(c) they have a self-governing private owner whose function is explicitly in the public interest

(d) managing modern buildings needs a different set of rules compared with traditional listed buildings, due to the implications of modern materials; also they are intensively used complex buildings designed with purpose-serving modular flexibility in mind, responding to the growth of a new university, and to continuing needs such as laboratory refurbishment, lift renewal, disabled access requirements, conversion of small offices to open plan, etc.

2.27 The **Weld Estate Dorset** contains Lulworth Park, an C18 designed landscape and the setting for Lulworth Castle. Other important buildings include St Mary's Chapel, a Roman Catholic chapel built in 1786-7 and the former stables and coach house of 1777, laid out around a square courtyard. Park Lodge is a C17 house remodelled in the mid C18; a row of cottages and a stable range have strong group value with it. The park, developed from a medieval deer park, contains the earthworks of a medieval settlement dating back to at least the C12 which formed the focus of the village until its removal in the late C18, when new cottages were built outside the park in

East Lulworth; St Andrews Church retains its C15 west tower. Gates and lodges were erected mainly in the late C18, including Clare Towers, North Lodge, Wareham Gate Lodge, two north-east entrances and three entrances on the south side of the park.

2.28 Owners are the Weld Estate and the local planning authority is Purbeck District Council which has a Conservation Officer and is advised by the Dorset County Archaeologist. English Heritage Regional staff are based in Bristol and DCMS is in London.

Weld: St Mary's Chapel (DB)

2.29 The assets at Weld are of relevance and interest because:

(a) of the complexity of the Register Entry which covers 18 individual assets at various scales grouped into seven Historic Asset Descriptions

(b) they form part of a rural estate with its own economic imperatives which include tourism, and a private estate owner family of many centuries standing

(c) they test the use of an HPA to simplify estate management for a range of built and buried designated historic assets, and to rationalise relationships between the owner of a significant estate and the local planning authority

2.30 According to the range of asset-types and existing designation-types in

each one, the eight pilots test the application of unified systems for designation and control over works.

2.31 The range of assets covered by the selected pilots can be described using various criteria.

(a) The main gap in **type** is an urban complex, perhaps consisting of a group of listed and unlisted buildings in a Conservation Area, standing over related and unrelated archaeological deposits. The main obstacle to use as a pilot would be the complexities of ownership.

Type	Standing building structure	Ruined building	Earth-work site	Buried deposits	Urban complex	Rural Land-scape	Historic Land-scape features	Park & Garden	Place or event
Cornwall	√						√		
Darnall	√	√		√					
Kenilworth	√	√	√	√		√	√	√	√
Langdale			√	√		√			
London Underground	√								
RAF Scampton	√			√			√		√
UEA	√							√	
Weld Estate	√	√	√	√		√	√	√	

Pilot projects by asset-types included

(b) All main **periods** are represented

Period	Prehistoric	Roman	Saxon	Medieval	Post-Medieval	Industrial	C20
Cornwall				√	√	√	
Darnall						√	
Kenilworth				√			
Langdale	√						
London Underground							√
RAF Scampton		√	√				√
UEA					√		√
Weld Estate				√	√		

Pilot projects by periods represented

(c) **Designations** absent from the sample are **battlefields** which have much in common with rural landscape sites, and **World Heritage Sites** which could be any asset-type.

Design-ation	SAM	Guard-ianship	PPG16 Archae-ology	LB I or II*	LB II	Dual SAM LB	Local List / unlisted	Cons Area	Park & Garden	Battle field	World Heritage Site
Cornwall	√			√	√	√		√			
Darnall	√		√		√		√				
Kenilworth	√	√	√	√	√			√	√		
Langdale	(√)		√								
London Underground					√						
RAF Scampton	√		√		√		√				
UEA					√						
Weld Estate	√		√	√	√	√	√		√		

(√) a small cairn within the Langdale HPA area was already scheduled, but nothing of the main axe-factory landscape which is its justification.

Pilot projects by existing designation-type

(d) Private **owners** are possibly under-represented, though HPAs may tend to be more suitable for larger / corporate / public owners.

Owner	Public	Private	Agri-culture	Tourism Leisure	Industrial	Instit-utional	Environ-mental
Cornwall	Cornwall CC						Transport
Darnall		Two companies			Steel production		
Kenilworth	English Heritage Warwick DC	One owner	Farmer	Guardianship Local recreation			
Langdale		National Trust	Farming tenants	Countryside recreation		National Trust	
London Underground	London U'ground Ltd						
RAF Scampton	MoD					Military	
UEA	University					University	
Weld Estate		Estate	Farming tenants	Countryside recreation			

Pilot projects by owner type

2.32   English Heritage identified the types of assets for which HPAs might be most appropriate, and the eight pilots can be matched against these six categories.

	Complex, many similar or several different historic assets	Environmental issues with conflicting needs; careful management to avoid damage	Dispersed single or similar asset type under single ownership	Already subject to management regimes where an HPA could work in alignment,	In a stable condition and likely to require only minor works	Owners and authority have strong commitment and a firm relationship can be established.
Cornwall Bridges			√	√	√	√
Darnall		√				√
Kenilworth	√			√	√	√
Langdale	√	√		√	√	√
London U'ground			√		√	√
RAF Scampton				√		√
UEA		√		√	√	√
Weld Estate	√	√		√		

Pilot projects by English Heritage's qualifying asset types / sets

London Underground: Cockfosters station (DB)

3   Historic Asset Records

3.1   The study of the pilots included an assessment of the Historic Asset Records (HARs) compiled as part of the process. This section of the report discusses their content and format in relation to the purposes they need to serve.

Evolving designatory descriptions

3.2   Descriptions of assets have changed and developed over the last fifty years. They began simply as a means of identifying the asset on the ground, ensuring the right one had been identified. They are now expected to be accessible to wider audiences, and the issue of their relationship with maintained record systems at national and local level has become increasingly pressing over the last twenty-five years.

3.3   The earliest list descriptions of **historic buildings** were terse, almost to the point of failing in their primary purpose of identification. With the re-survey programme of the 80's and 90's, structure and length was standardised through the use of a helpful mnemonic, B-DAMP FISHES (Building, Date, Architect, Materials, Plan, Facade, Interior, Special features, Historical associations, Extra information, Sources). More recently, descriptions have tended to become longer and to break away from that format.

3.4   **Ancient monuments** were mostly identified only on small-scale maplets with titles until the Monuments Protection Programme, a review of the schedule of ancient monuments, began in the late 1980s. This generated lengthy referenced descriptions placing monuments within the context of a generic 'monument class descriptions'.

3.5   The two registers also provided more information. That for **Parks and Gardens** includes a full researched description, and that for **Historic Battlefields** a summary of historical context and mapping to illustrate the course of the conflict.

3.6   This differential state of development amongst the types of designation causes some anomalies. The list description for Kenilworth Castle is 70 words, and for the Church of St Nicholas 23 words, yet the Parks and Gardens Register entry for the designed landscapes is 6.75 pages long.

The unified Register

3.7   HARs form part of the proposed unified Register of Historic Sites and Buildings of England (RHSBE), an integrated designation system for describing and mapping historic assets (1.6 above).

3.8   For most sites, a **simple entry** on the register will define what is designated and why. It will include a written element, describing what is included with a summary of importance linked to criteria for designation, and a GIS map defining the extent of the designation. For **complex sites with multiple designations** that relate closely to each other, a two-tier approach to documentation will be needed in order to provide a more comprehensive assessment. Each individual asset will be documented in the same way as a HAR, but they will be accompanied by an overall description of the site as a whole.

3.9   English Heritage's paper, *HPR – Reforming Heritage Designations*, gives examples of old and new entries for assets in the assessment pilots.

(a) " … the original list description for **Southgate underground station** is fairly cursory, at just five lines long. It is mostly descriptive detail with a reference to the architect. A new style Register entry runs

to three pages, written in a more accessible way, with historical and contextual references, and a more detailed description of the significant elements of the station."

(b) " … the issue of sites which are currently both listed and scheduled, or administratively messy. Higher New Bridge in North **Cornwall** has two list entries, one for each end of the bridge in different parishes, at different grades, and is also scheduled. Under the new Register, this bridge would simply require one entry, and one grade."

3.10 It also gives examples of how complex sites can be handled in a way that brings out their significance more clearly.

(a) "At **Kenilworth** in the Midlands, as part of the pilot the individual components include the castle, which is the most well known element, but also the mere and pleasance, the abbey, fishponds and church. These are grouped together under one Register entry which explains the context of this medieval landscape and how each element relates closely to each other."

(b) "At **Langdale**, a remote site in the Lake District, we can take a simple approach to very dispersed collection of Neolithic axe factories across a landscape, internationally significant but difficult under the current regime to designate. We have identified groups of axe factories, but have also been able to explain the importance of the wider landscape which is of a large scale."

Compiling the HARs

3.11 Issues arising from compiling the HARs are reported in more detail by pilot scheme in the first *Assessment / Narrative* report. This section draws out general issues, but the pilot(s) from which they originated are indicated because it would

need further work to see whether they have a wider application.

3.12 The *operational* framework for compiling the HARs was affected by at least three factors in addition to those arising from working out the application of new procedures on the ground. Two may have been a product of time pressures on the HPR project as a whole, and the third was an exacerbating factor.

(a) It seems that some HARs were written in the localities in parallel with the devising of compilation guidance on templates for writing them, not formally issued originally issued until June 2005. Some HARs were also revised, probably in response to revised guidance (version 2) issued during the course of this assessment.

(b) Similarly, compilers had to draft statements justifying an asset's inclusion and grading in the absence of worked-out and field-tested 'decision criteria' which had apparently not been finalised at the time of the assessment.

(c) An effect of the dislocation caused by reorganisation and regionalisation was that some HARs were compiled relatively independently, with HPR staff using their best judgement rather than working within a well understood tried and tested framework. This has had genuine benefits which could perhaps only have been obtained at this pilot stage, in opening up the options and in forcing the confrontation of issues about audience, readability and cost-effectiveness.

3.13 All in all, these will have affected time totals required for compiling the pilot HARs, which, as more than one person commented, are not a safe guide for future requirements.

3.14 Several issues arose about the *scope* of the assets included within an HAR.

(a) EH designation staff identified an archaeological tendency to group things together and see interconnections, and a building conservation tendency to focus upon each asset separately. Both have their place, but the new designation documentation needs to reflect the right balance between them for the place in question. At **UEA** where the primary focus is on four sets of buildings, the landscape element had to be inserted in the Register Entry, and the Statement of Significance brought it out more clearly.

(b) Whilst the scope of an HAR should be led decisively by the significance of the assets it includes, other factors should not be ignored. The combination of basically cooperative partner landowners and relatively simple asset types will allow larger areas, usually in the countryside, to be included on a precautionary basis, often incorporating buffers around areas of known sensitivity (**Langdale**). Yet whilst the potential for an HAR to work in with and facilitate good estate management is an important factor, care should be taken to ensure that this does not override selection on the basis of significance, either to exclude or to include.

(c) Quite complex sets of designations have developed in some pilot areas. At **Weld** where there is a single owner, a three-tier hierarchy is represented by the wrapper Register Entry, the Historic Asset Records and those of the latter that include several assets. This is a useful tool for expressing coherence (or discontinuity) in time and space, and for engaging interest of all kinds in the larger picture. At **Kenilworth**, where there are three owners, there are three Agreements running in parallel, but covering a set of assets whose grouping is not difficult to explain.

3.15   Several *drafting* issues were identified, some relating to skills and experience, and others to technical

problems. HAR entries for particular asset types had to be drafted within a generic template format designed by the HPR team; learning how to apply it to particular asset types was effectively part of the development process.

(a) Staff involved with **Cornwall Bridges etc** found combining existing documentation for listing and scheduling required the development of a common style and format suitable for a single designation-type, merging two existing ways of writing, and also balancing brevity and clarity with academic rigour and proper treatment for the information provided. Colleagues at **Darnall** felt the challenge has been to translate existing designation texts and new knowledge of significance into the new documents, responding to requirements for better content and evaluation of importance, to compress technical information, to link specific buildings with an industrial process, and to address a lack of appreciation for architecture. This has required disengagement from old thought patterns and engagement with new ones that combine the building, technology, and history. Longer descriptions are useful because the industrial processes must be explained in order to assign a proper level of significance.

(b) Previous experience of writing listed building descriptions was found to be helpful by staff writing HARs for **Weld**, despite a perceived lack of guidelines.

(c) All pilots were able to take advantage of technological advances in preparing mapping, especially in conjunction with GIS. At **Langdale**, the difficulty of access to the landscape, its anonymous nature and the lack of clear landmark features relating directly to archaeological deposits required the definition of the most difficult assets by means of GPS coordinates.

3.16 The quality of *sources* was another variable, within or between pilot schemes. (a) For **Cornwall Bridges etc**, there was considerable variability in the existing baseline data, caused by listing revision or MPP work done at different times and in different formats, and material dispersed through several local sources**.**

(b) **Darnall**, **Langdale**, and **RAF Scampton** all benefited from the existence of high quality thematic studies which provided a good framework for describing the actual assets themselves. For **Cornwall bridges etc**, though some general survey work had been done earlier, the circumstances of a selective pilot required visiting to ensure some of the assets still survived, and to understand the larger groups of which the pilot was a selection, which meant looking outside the actual pilot area; this was especially important for milestones.

Assessment of the HARs

3.17 This assessment is concerned with reviewing the HARs for intelligibility and usefulness. It is not concerned with checking them against the assets themselves or with checking them against the instructions behind them. Comments on individual pilots' sets of HARs in the Stage 1/2 of the assessment form the basis for this discussion, but neither aspire to comprehensiveness.

3.18 The basic concept of simple single Register entries and complex multiple entries with their own 'wrapper' Register entry makes good sense and seems to work well in the pilots examined. However, the complex multiple entries will probably be of two broad types, those where the grouping is significance-led, such as at **Kenilworth** where castle, abbey, parish church, mere and Pleasance have obvious historical affinities, and those where it is primarily locational, such as at **RAF Scampton** where unrelated expansion-period hangars and a Roman

villa lie within the airfield perimeter. Protocols and criteria will need to be developed for use with potential groups assets, especially where HPAs are not contemplated, for deciding when the approach using multiple entries is justified and for what reasons.

3.19 The HARs were generally written interestingly and clearly. Technical terms should be explained as they arise, working from a glossary that is consistent with thesauri used by national and local records systems and is also available independently on line. Authors' inevitable familiarity with technical terms and consequent difficulty in judging what is unfamiliar to others requires editorial scrutiny of drafts and a protocol that words already in the thesaurus should normally be explained if they are not being explained anyway as part of the Asset Description. In fact few problems of this kind arose in the pilots; rare examples in the **London Underground** were *pylon* and *passimeter*.

London Underground: pylon at Oakwood Station (DB)

3.20 Writing must be interesting, but enthusiasm and commitment should not obtrude unhelpfully in documents intended to support legal process and

withstand legal probing. This does not mean that they should not reflect what is interesting and worthy of admiration in the architecture, but it does require avoidance of the superlatives that always give trouble in conflict situations by casting doubt on the judgement brought to bear on the merits of the whole entry. 'Exquisite', 'superb', 'unsurpassable', and 'satisfying' say more about the writer's feelings than about the building; saying a building 'fully' merits the highest designation grading implies other buildings might 'only' (just) merit it (**London Underground**).

3.21   There is a general difficulty about dividing material in the HAR between Summary of Importance / Criteria Decision and 'Historic Asset Description', raising the question as to whether the problem is one of understanding how to use the format or the format itself. There are examples where the Summary is much too long and contains material that should be in the Description (**Darnall**). In some HARs the first thing met is a generic justification for including the asset-type, meant to be helpful, but actually blunting engagement with the specifics of the item (**Cornwall**).

3.22   The basic problem seems to be uncertainty about how to handle the 'Summary of Importance / Criteria Decision'.

(a) One practical reason must be that, at least at the time of assessment, the 'decision criteria' had apparently not yet been finalised. This might explain why in some cases 'Summary of Importance / Criteria Decision' merely duplicates sections of the 'Assessment of Importance' rather than provides a genuine summary of the whole asset (**London Underground**). In others the introductory paragraph at the beginning of the Register Entry description is imported yet is not in fact a summarising item (**UEA**). In others the 'Summary of

Importance / Criteria Decision' does not relate what is described to a grading decision (**UEA**).

(b) A more fundamental, but by no means fatal, reason may be that there is an unresolved tension between the high and proper ambition to justify the designation up-front and the requirements of a logical read in terms of what the HAD is seeking to achieve overall. In their own ways, developed listing descriptions and MPP scheduled monument records are much more disciplined creations.

3.23   That discipline needs to be harnessed for the more challenging task of creating HARs that must satisfy wider audiences.

(a) As far as Register Entries for several HARs are concerned, how **Darnall** might have been (but was only partly) tackled provides an example. A short summary paragraph that distils the identity and significance of its subject, capable of leading readers unfamiliar with the site or industrial history / archaeology gently into the topic should precede a paragraph, listing the elements included at HAR level. These should be followed by paragraphs with locational and site definition material, the history of the use of the site, the technical significance of site processes, and the context of the site in Sheffield steel-working. In the drafting process, the first paragraph should be finalised last.

(b) As far as single Historic Asset Records without parent Register Entries are concerned, a reader-friendly order of Title – Summary of identity and significance – Detailed asset description – Asset-type context – References would be helpful. Again, the Summary gets written last. The Detailed asset description should have a predictable structure, which might have to be varied for different types of asset, but would help people find the information they wanted, act as a check-

list against omissions (**Kenilworth**) and guard against repetition (**Weld**).

(c) In both cases the decision criteria might figure twice, first as a short reference in the summary of identity and significance, and second with a fuller explanation in the section on context.

3.24   Some other matters could be considered in order to improve the HARs.

(a) Long unbroken paragraphs, rather slabby on the page, make for difficult reading and uncertainty about what topic is being covered and whether it has changed. Sub-headings could be used more (**Darnall**, **Langdale**).

(b) Where there is an existing listing or monument description a check should be made that all the essential information has been captured in the new HAR (**Darnall**).

(c) The grouping of HARs under a Register Entry should be explicitly justified and explained (**Kenilworth**).

3.25   An underlying issue is that of length for the HARs, which in some cases is considerable. It reflects proper ambitions to communicate the significance and interest of the asset, and several partners have said how useful it is to have so much material (**Cornwall**, **Kenilworth**, **London Underground**). Yet, if this is the standard for all RSHBE entries, the cost implications are significant and progress achieving coverage will be slow. Reductions in length should be achievable through a more tightly organised and monitored approach to writing the HARs. The importance and complexity of assets subject to HPAs may also justify otherwise atypically lengthier treatment.

3.26   But the best tool is already an explicit part of the whole HPR programme, namely developing useful and economical relationships between the

RHSBE and existing record systems at national and particularly local level. The authorial urge to tell all must be modified by an intelligent and helpful use of references, whether to underlying thematic surveys or publications (**Cornwall**, **Darnall**, **Langdale**, **London Underground**, **RAF Scampton**) or to the local HER or NMR where such material ought anyway to be stored retrievably. In short, the RHSBE entry will have legal and informative sections, the latter consisting of the entry text, supporting references, and the external sources to which they direct the reader.

3.27   That raises the issue of the target audience for the HAR, which is expected to be made available on-line for greater public benefit (unlike Listed Buildings on Line). Here it is important not to try and tick too many boxes for fear of falling between some of them. HAR authors should be trained in entry structure, the use of plain but interesting language, and glossary thresholds. But they should be aiming fair-and-square at the intelligent lay-person, owners and their agents, and the users of a regulatory system. They should not attempt at the same time to mediate the information so that it is readily accessible to everyone of all ages and interests in the community. That is a task for others, not least the Historic Environment Records envisaged as a statutory component of the new system, many of which have already shown the way with accessible and interactive projects funded through partnership with the Heritage Lottery Fund.

3.28   Making direct comparisons between the existing and proposed documentation is of only limited use, because in some cases (e.g. **Langdale**) there was none of the former, or it was so obviously limited by comparison that little need be said.

(a) At **Darnall**, the existing list descriptions date from May 1987,

presumably part of the accelerated resurvey programme. Though giving some detail, they are primarily for the purposes of identifying the building. By comparison, the new HARs provide descriptions which also indicate how the surviving parts of the buildings worked. This is more informative and useful for all readers, as well as justifying the designation by explaining the historic usage.

(b) At **Kenilworth** the old list description for the Castle is 70 words, and for the church 23 words. The Parks and Gardens Register entry for the designed landscapes is 6.75 pages long. The HARs are an improvement on the list descriptions. There is a danger of over-elaboration but length is a difficult balance on a complex site. The MPP descriptions and the Parks and Gardens Register entry have been used extensively in the relevant HARs.

(c) At **UEA** the documentation for the 2003 listings has been largely carried through into the Register Entry and the HARs for the pilot scheme, but there is also some significant new material from Cambridge Architectural Research Ltd.

(d) At **Weld** the new descriptions are less rigorously compiled, not being bound to follow the B-DAMP FISHES mnemonic used in the 80s and 90s. One consequence is that some of the architectural detail in the old descriptions does not appear in the new ones. This need not matter providing the basis of survey is made clear, major features are included and there is an appropriate warning that the description does not include every element that may be of significance.

University of East Anglia: Library (DB)

4   Heritage Partnership Agreements

Aims (*English Heritage – adapted*)

4.1 Heritage Partnership Agreements (HPAs) are intended for complex or multiple sites as an alternative management regime to the heritage consent system, usually covering minor classes of works. They are a logical development of a management agreement under section 17 of the Ancient Monuments and Archaeological Areas Act 1979 which automatically covers any necessary consents, and of informal memoranda of understanding between owners and managers, the local authority and English Heritage on complex sites including listed buildings. HPAs will be appropriate for specific asset management rather than universal application, and most useful on sites where a different approach than that offered by the individual consent regime is desired, involving strategic and proactive management.

4.2 The principal partners would be the owners and managers of a site, the local authority; and where appropriate English Heritage, other government departments, such as Defra and non-departmental public bodies. Other interested parties are likely to be amenity societies, local and national campaigning organisations, and regular users of the sites.

4.3 HPAs have several aims. They should lead to better understanding of the significance of assets and the risks they face, including potentially conflicting interests in asset management and the identification of positive solutions. They should encourage effective partnerships between owners, managers, local authorities, EH and other interested parties, as part of a positive rather than reactive approach to the management of a site. By eliminating the need for close regulation for defined categories of change, they should give enhanced

certainty and clarity for the partners about which works are, and are not, likely to require consent.

4.4 Agreements would be tailored to suit the needs of each particular site. The kinds of sites where HPAs might be most useful include:

(a) complex ones comprised of many similar or several different historic assets:

(b) those with a number of environmental issues which may have conflicting needs and which need careful management to avoid damage to assets

(c) those in dispersed locations of a single or similar asset type under single ownership or management

(d) those already subject to management regimes already, where an HPA could work in alignment, such as natural environment regimes, tax exemption schemes, or traffic management systems

(e) those that are in a stable condition and likely to require only minor works

(f) those where the owners and authority have a strong commitment to its future and a firm relationship can be established.

Format (*English Heritage – adapted*)

4.5 Documentation need not be elaborate, should be flexibly designed, and where feasible fit in with existing conservation strategies and existing documentation. Four main elements are needed.

(a) **Administrative information** would identify the parties to the Agreement and their roles, and include the Register entry together with the map for the site. It would set out practicalities, including an agreed timeframe for the HPA, perhaps

five years, a method of monitoring, review and renewal, and an agreed grievance procedure.

(b) A **conservation framework** would provide an overarching conservation philosophy for the site able to act as the context for any decisions about particular works, and assist in the formulation of any detailed consent applications.

(c) **Specifically agreed works** or categories of change to the asset could take three forms.

(i) Prescription of certain works that are agreed not to require consent. An HPA may identify certain works that will not affect the character and will not therefore require consent (this will require legislative change).

(ii) Pre-agreed consent for certain works that would be covered by the new heritage consent (currently Listed Building Consent and Scheduled Monument Consent). Situations frequently occur where repetitive consent applications are required for routine works of a similar nature. Such works can be agreed between partners and form part of the HPA.

(iii) A specification of standard works, including whether prior advice, agreement, planning permission or consent is required and the materials and method to be used.

(d) **Excluded works** need to be identified. Major interventions that would change the assets significantly should not be included because they are better handled as part of the specific consent regime, where detailed consideration of particular plans can be considered. Planning permission will also need to be sought separately for major works.

The pilot HPAs – types of agreement

4.6 Seven HPAs were seen during the assessment, that for the **Weld Estate** not having been finalised due to difficulties in taking the project forward. Two are tailored agreements sitting within wider conservation frameworks, the *Management Guidelines* at **RAF Scampton**, and the *Conservation Development Strategy* at the **University of East Anglia**. The other five generally follow the recommended format with some variations. **Cornwall** has separate sections for the three types of asset included, and individual bridge statements are to be prepared. **Darnall**'s Conservation Philosophy explicitly recognises the relationship between the commercial needs of a working industrial site and the responsibilities attached to historic assets of national or even international significance. **Kenilworth** has three separate Agreements for three owners, English Heritage itself, Warwick District Council and a private landowner; coordination with an Abbey Fields Conservation Plan prepared in parallel by a local group is also needed. **Langdale** involves a conservation organisation, the National Trust, and incorporates existing codified practice for dealing with erosion and footpath repairs. The **London Underground** has separate Agreements for each of the three stations taken forward in the pilot, containing generic Agreements and Directives, but station-specific sets of works included and excluded.

Kenilworth: view across the mere (DB)

Approaches to defining works

4.7 Of the five 'standard' HPAs, four define the works that are their subject and provide model specifications or refer to working statements (**Cornwall**, **Darnall**, **Kenilworth**, and **Langdale**). Colour coding is used on the mapping, at **Darnall** and **Kenilworth** to indicate the sensitivity of asset types by area, and in **Langdale** to show known and potential sensitivities.

4.8 Towards the end of the assessment project, the EH Heritage Protection Team issued an Explanatory Note about the Proposed Pilot Management Maps. This proposes using four colours to indicate appropriate management regimes.

(a) Green: heritage consent not required, but represents a material consideration in the planning process

(b) Yellow: low-level control for flexible management of certain landscape / archaeological features, possibly including metal detector licence, duty to report finds, etc

(c) Blue: above ground structures, buildings and some horizontal surfaces, a "fusion of .. close SMC regulation and the change-orientated mechanism of LBC"

(d) Red: buried archaeological remains and monumentalised structures …"similar controls to those under the current SMC regime".

Colour coding is not the same as a 'traffic lights' scheme, even though the same colours are used. The only true 'traffic lights' scheme is used for the **London Underground**, where green denotes pre-agreed works, amber those for which advice should be sought, and red those for which a formal consent should be sought in the usual way.

London Underground: Turnpike Lane (DB)

4.9 The other two use their own convenient devices in order to relate assets to types of works. At **RAF Scampton**, which includes many locally designated assets, the *Management Guidelines* are expressed as a series of policies; there is a useful table showing which policies apply to which assets. The policies comprise a comprehensive range of topics from the strategic to the site-specific, from design to archaeological recording of buildings and buried deposits, under headings of 'Site Planning', 'Archaeology', 'Demolition of Buildings', 'Design of New Buildings, Extensions and Alterations', 'Landscaping', 'Roofs', 'Walls', 'External Paintwork', etc etc. At **UEA** the strategy section of the *Conservation Development Strategy* correlates a five-tier hierarchy of significance to be applied to assets with identified types of policies, those for maintenance / management and refurbishment / alteration referring to the types of works that HPAs normally seek to cover.

Assessment of the HPAs

4.10 This assessment reviews the set of HPAs as documents and against their stated aims. Because the agreements are still in process of completion, analysis relies upon the hopes and fears about potential outcomes expressed by those who try to achieve the same results under existing arrangements, together with some commonsense appraisal.

4.11 A *better understanding of the significance of assets and the risks they face, including potentially conflicting interests in asset management and the identification of positive solutions*

(a) The format and clarity of organisation for the HPA documentation will determine its usability. An HPA needs to combine statements about the significance of the assets affected with the exact legal requirements and enough general and specific information about how to apply one to the other. The **Cornwall Bridges etc** HPA needs an initial section which briefly summarises that format and distinguishes the three classes and six types of assets which are covered by it. A simple total index, probably by parish, would usefully complement the lists by parish within each asset type. It also needs the specific statements that would tie the general requirements to each bridge. Several owners wanted to see the hard practical requirements and supporting advice up front with worthy conservation rhetoric, legalities and detailed descriptions in accessible appendices.

(b) Where there are complex agreements, such as the three at **Kenilworth**, it will be important to have detailed mapping that shows assets, legal responsibilities for management, and areas to which individual parts of the licence relate.

(c) An important issue raised in the course of preparing some pilots was the extent to which works could be specified without importing into the Agreement generally the liabilities attracted by individual contracts of works. The aim has been for the regulator to make sufficiently clear what is required with sufficient technical rigour while still requiring the owner to engage with the demands of the individual task. Different pilots illustrate different versions of the problem. English Heritage regional staff members at **Kenilworth** are concerned

about the liabilities arising from over-precise template specification. Yet at **Darnall**, one of the owning companies stated a need for a clear document which gives priority to the detail of day-to-day maintenance on specific structures rather than 'flowery descriptions' or generalised prescriptions. There is a need to know what work should be done in what way in order to ensure conservation objectives are achieved, e.g. straightforward detailed description about brick types, mortar mixes and laying methods, suitable for a competent non-specialist foreman and management by a clerk of works to a standard that can be quality assured.

 4.12   The *encouragement of effective partnerships between owners, managers, local authorities, EH and other interested parties, as part of a positive rather than reactive approach to the management of a site*

(a) An almost symbolic point about effective positive partnerships was made at **Kenilworth**, about the need to distinguish clearly between two sorts of recording. There are records noting that certain repairs have been carried out under the agreement to be kept with the agreement, and records made as an intrinsic part of those works, before, during and after, to be placed in the County HER and with site historical / archaeological documentation. This can only help promote a currently under-developed culture of integrating recording with conservation tasks.

(b)   English Heritage staff involved with the **Cornish bridges etc** pilot report that the HPA is bringing a new technical rigour not previously applied to many repair operations. An example is the provision of technical information that should ensure damaging paints are not used for repainting milestones.

(c) A key issue for the partnerships at the core of the HPAs is the extent to which

the local authority planning committees are prepared to sign up to arrangements that might be perceived as removing their statutory duties and democratically endorsed rights. On the one hand only small-scale works are involved, such as may already be handled informally or are delegated for decision to officers. On the other hand, some local authorities are more politically sensitive than others; delegating decisions to officers may be an issue over the **London Underground** in the case of Westminster, where there may be a reluctance to lose political control on even minor matters, and where 17 local amenity societies expect to be notified about applications.

(d) A related issue is how positive the approach can get. This is illustrated by the two pilots that form part of larger management schemes. That for **RAF Scampton** is within a military framework will probably have a reinforcing and stabilising effect. That for **UEA** may however have the opposite effect due to the tensions inherent in a document that combines one partner's aspirations with more widely agreed schedules of works, though intelligent collaboration should minimise the risk.

(e) Part of effective positive partnership is recognising the problems of partners. This was illustrated at **Kenilworth** where the first draft HPA was modified in line with comments about agricultural practicalities from the private landowner. By the same token, open and transparent measures for inspection, review and reporting will be an important part of the package for interested parties such as the national amenity societies. This should be associated with arrangements for formal record-keeping by the signatories to the HPA, a matter on which some general guidance will be required.

(f) An interested party is usually the County Archaeologist with regard to HPAs with an archaeological or a recording component that incorporates advice given to the partner District Council as local planning authority, and involves ensuring proper arrangements for the monitoring, recording and reporting of works, together with aspects of watching brief work. In some pilots the County Archaeologist, whose work-load could be affected by a successful HPA, was not brought into the loop early enough, though this was not a problem for **Cornish Bridges etc** in an area with a strong county historic environment service.

4.13 The *elimination of the need for close regulation for defined categories of change*

(a) In some organisational contexts where frameworks are extended or driven by performance requirements there are concerns. For the **London Underground**, fears were expressed about the ability of the HPAs to provide adequate control over sub-contractors to the Infracos.

(b) Even if such framework issues can be resolved, there may be other issues about the interpretation of what is included within them. This is best exemplified in concerns expressed by the Twentieth Century Society, a statutory consultee, which believes that potential conflicts between improving the environmental performance of buildings and conserving their historic fabric should be more explicitly recognised through clearer guidelines. At present, there is a conflict of view along the lines of "one man's patina is another man's dirt" between the Infracos and the Society over the replacement of damaged tiles in the **London Underground**. At **UEA** it crops up with repairs and protective measures for reinforced concrete. Partly it is a matter of subjective aesthetics, and partly of whether the architect envisaged staining as a natural process affecting the concrete, and therefore something acceptable rather than a superficial

condition that should be reversed if opportunity arose. If the latter, then the Society wishes for reassurance from a clear technical statement of need and remedy believed to exist in a recently issued 'Concrete Preservation Plan'.

4.14 The provision of *enhanced certainty and clarity for the partners about which works are, and are not, likely to require consent*.

(a) This issue taxed partners to several pilots. It was put most clearly by English Heritage Regional Inspectors at **Kenilworth**, who stressed the importance of agreements clearly stating what they do, and do not, cover. The list of Scope of Works included in the agreement is fine, but a list of works not covered has dangers because some may be omitted. It should also be stressed that all other works are likely to require consent, and that none of them carry a deemed planning permission. There was a similar reaction to the 'traffic lights' system for the **London Underground**, perhaps the most rigorous of the proposed schema, from a London Borough, suggesting that being too prescriptive about what needs consent risks omitting things that are not anticipated, and asking whether it is better simply to specify what does not need consent – and scrap the traffic lights. It is clear from **Cornwall Bridges etc** that editorial care must be taken to ensure that formulaic statements are carefully checked as to fitness for context, and that consistency of wording for similar operations between asset-type sections is maximised without losing the individuality of treatment some may require.

(b) Undoubtedly there will have to be trial periods of usage for the various colour coded systems proposed in several pilots, but this is entirely possible with the in-built review points. An example of a

matter for testing is the Heritage Asset and Management Regimes colour coding at **Darnall**, seen by some as a system that makes an unhelpful distinction between below and above ground heritage, when a more flexible approach is needed for industrial buildings. That very flexibility, however, may reduce certainty and clarity for the owner-partner, in a way that more straight-forward colour-coding applied to the **Kenilworth** agreements might not. Notably, at **Langdale** the nature of the asset and its general inaccessibility, together with the absence of development pressures makes it possible to avoid a complex 'traffic-lights' approach to defining pre-agreed and controllable works.

4.15 A final set of points concerns the making of Heritage Partnership Agreements once the power has been embodied in legislation. Local Authorities are expected to take the lead over (new) Grade II assets and English Heritage over (new) Grade I. It is uncertain how many sets of historic assets will be put forward, by local authorities or owners, as suitable for that treatment, but there may well be a capacity issue for local authorities, compounded of staff resources and political will to ensure those resources are available. A reality check is provided by the decidedly variable treatment of Conservation Area designation, Local List compilation and Buildings at Risk Register maintenance across local authorities. If heritage protection reform is to work, there will have to be a more even and consistent commitment to all these activities as well as to the negotiation of partnership HPAs. There will also have to be clear guidance to help protect local authorities from powerful local interests seeking to gain an unwarranted degree of control over their land and / or buildings.

5 Benefits and costs

5.1 This section compares the outcomes of the pilot projects, insofar as they can be discerned, with the expectations identified in paragraphs **2.8 – 2.29** above (which were drafted first). It discusses issues arising from developing the partnerships. It reviews the available information on the costs of preparing HARs and HPAs, and of running a system based upon them.

The selected pilots: provisional outcomes

5.2 Cornwall Bridges etc is considered to be one of the most successful pilots. The HPA has considerable scope for simplifying and improving the management of routine works and maintenance on publicly owned historic assets. The effectiveness of a unified designation regime is particularly apparent.

(a) It has established / confirmed a model framework readily applicable elsewhere in the county and in other counties. Bridges can be grouped by type for repair specifications; having one owner makes it easier.

(b) The HPA 'normalises' an often artificial emergency situation requiring Class 5 consent for urgent works following often minor traffic collision damage. By cutting out a remote bureaucratic process that is legally required of DCMS but cannot add value to small-scale predictable works, it is easier to bring together the Bridge Engineer and Conservation Architect and ensure proper input of professional advice. The main benefits are better results, time saved and red tape cut, but principally better working relationships.

Cornish Bridges etc, designation mapping: old (above) and new (below)

(c) Politically, the HPA helps a public authority set an example of good conservation practice (though without active publicity and promotion no-one will notice). There is also pride in Cornwall managing its own historic assets.

(d) The pilot validates the importance of having a strong local /sub-regional historic environment service. North Cornwall District Council's Conservation Officer is content with the HPA always assuming appropriately skilled staff are in place at District and County level. Because the County Council as Highways authority is the owner of the assets, its Historic Environment Service is able to say that the HPA will "improve the ability to manage these heritage assets and reduce time in providing information to those involved in consent procedures."

5.3   Darnall Works is an important adjunct to a successful combination of regeneration and heritage conservation. It shows that a unified designation system enfolding both standing and buried industrial archaeological evidence can simplify conservation management on a site with development pressures. It has positive and uncertain aspects.

Darnall Works: small crucible shop (EH)

(a) In the right place at the right time, its development has contributed towards success in obtaining European Objective 1 funding.

(b) It has also demonstrated the importance of proper collaboration
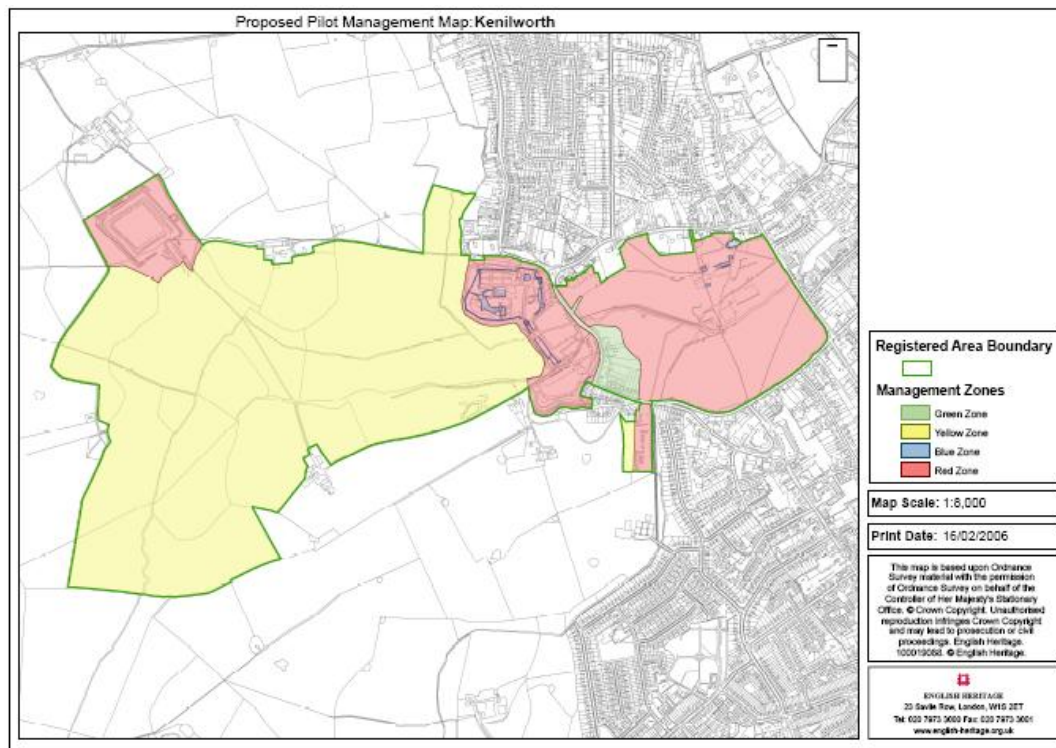
between designation and casework colleagues in English Heritage, and the value of individuals experienced in both sets of activities, in order to carry through the concept of significance into post-designation casework.

(c) Darnall Works Ltd is concerned that Sheffield City Council will not have the staff resources to produce usefully detailed documentation and deal properly with notified works. This difficulty could be exacerbated by staff turnover. Sheffield City Council and SYAS hope that having an HPA would mean a better level of monitoring of works than at present, though that would have resource requirements.

(d) Sheffield City Council feels it is important to clarify the relationship of an HPA to the planning system; their lawyers have not yet been consulted.

(e) An HPA is better than supplementary planning guidance. It is politically attractive as a potential bridge between compliance and non-compliance. It is practically attractive because it requires an on-going dialogue with statutory authorities.

5.4   Kenilworth indicates the scope for coordinating and improving existing controls and involving local private stakeholders, though there will be a shift of resource requirements from English Heritage to the local authorities. Here the unified designation system is covering a physically wide range of historic assets and part of the challenge of making it work is to persuade separate stakeholders to see the whole as well as the part that concerns them immediately.

Kenilworth: Registered Areas and Management Zones

(a) A reduced management oversight by English Heritage will put the onus on local ownership, but a less bureaucratic management regime should reduce time spent in form filling.

(b) Warwick District Council is concerned that an HPA will require more rigorous and resource-hungry procedures, with, for example, recording and monitoring of permitted works before – during – after. The impact of these demands can however be mitigated to some extent by ensuring good coordination with the County Archaeologist and between the various District Council departments.
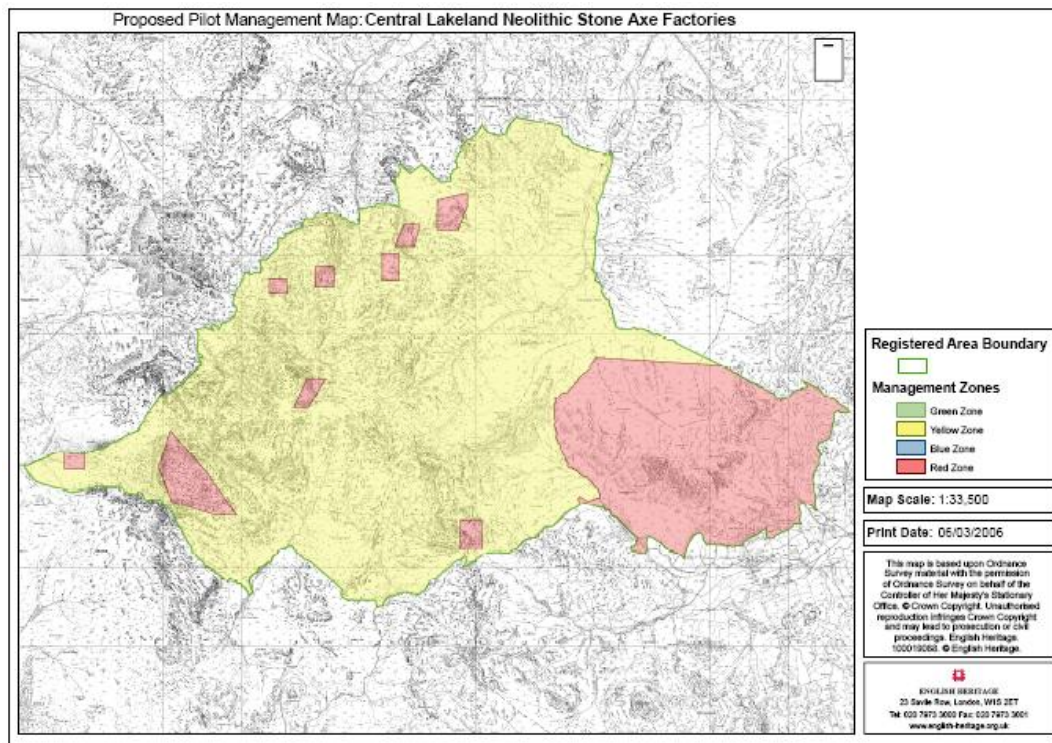
(c) English Heritage Regional Inspectors feel that an HPA could compensate for the internal coordination problems of the Class 6 consent regime by firmly locking all partners into the right procedures from the outset.   It also has the potential for varying controls flexibly according to the circumstances of an asset; the transition

made by the Gatehouse from a ruin to a roofed and used structure is a good example.

(d) For stakeholders, an HPA and regular review meetings will reassure that there is a firm framework in place. It will also provide a predictable mechanism for consultation on schemes within and beyond the HPA.

(e) The HPA also demonstrates the need for skilled agricultural input to the practicalities of micro-management on rural sites, on matters such as post digging, contract ploughing etc.

5.5   **Langdale** probably involves the least change in working arrangements on the ground because management arrangements have already been agreed voluntarily, but it does provide a vehicle for appropriate designation beyond the scope of the existing Ancient Monuments etc Act 1979.

Langdale: Areas of general and specific management sensitivty

(a) Due to the lack of existing designations, an HPA would obviously increase the number of consents required, but this would be within a framework that itself minimised procedural demands. A repetitive SMC already exists on the small scheduled area, and had the whole area been scheduled as proposed in the 1980s there would have been much scope for its extension under the Section 5 (Health & Safety) class consent. A Section 17 Management Agreement would have covered most of the HPA area.

(b) Lake District National Park considers it is valuable to have a designatory wrapper around the axe factories when arguing for targeting of areas in agric-environment schemes, applying for Countryside Stewardship, HLF grants, etc.

(c) The National Trust considers that the HPA is unlikely to change land management. Other are factors more important, such as the fall in sheep numbers by 70% in last ten years, helping deal with erosion by letting grass re-grow and knit surfaces together. But if change continues and hill-farming dies out, unchecked regenerative growth will begin to change the appearance of the landscape.

5.6   The **London Underground** pilot is notable for trying to bring consistency and improved performance to managing historic assets that are part of complex organisational arrangements and have heavy usage pressures. Its most useful test of the unified designation regime is that explicitly parts of some stations are not covered by controls because they have no heritage merit, whereas under existing systems everything that formed part of the station would come under control regardless of merit.

(a) The London Boroughs involved with the pilot stations feel that pre-agreement of minor repairs already works quite well for 90% of the time, but that the monitoring required by an HPA (not always done at present through pressures of work) will add to resource demands. From their perspective, if they have only

London Underground: designation mapping, Arnos Grove Station

one or two stations in their area, a full-blown HPA seems a heavy instrument, though its value to London Underground Ltd and the Infracos is recognised.

(b) The HPA could be a useful mechanism for sorting out and standardising the approach to matters that are contentious for the Twentieth Century Society such as the replacement of original tiles.
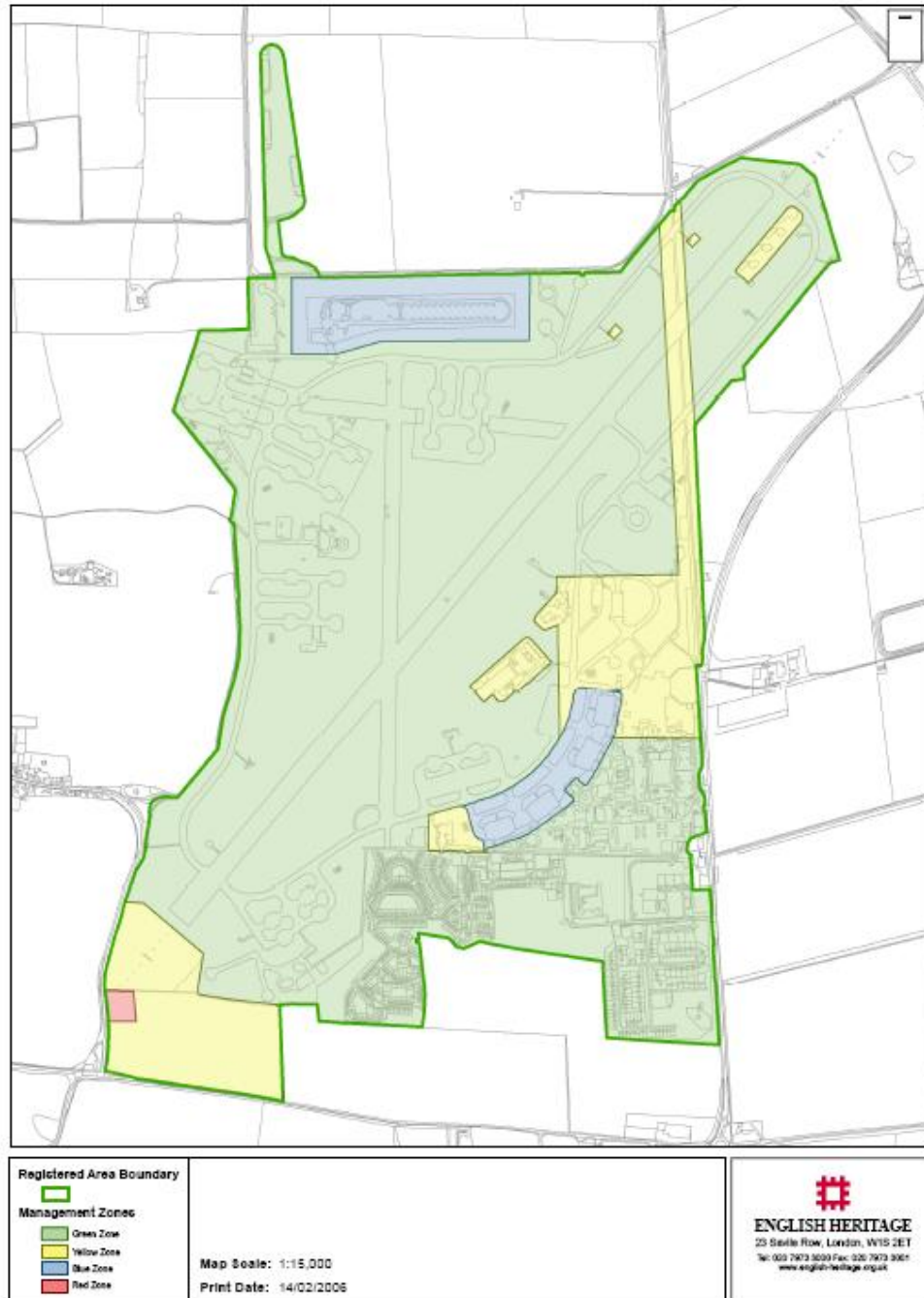
(c) Both new and old processes depend for effectiveness upon a good chain of communication, instruction and verification from London Underground Ltd, through the appropriate Infraco to whichever sub-contractor may be used for a particular task. Monitoring performance would be assisted by a good comprehensive photographic record of the current condition of the stations at the outset of an agreement.

5.7   The benefits for **RAF Scampton** in terms of reductions in consents are not easily measurable, partly because of crown exemption, and partly because most of the historic assets were not previously designated. The existing system of notifications will effectively continue.

(a) The HPA sits within Conservation Management Guidelines agreed with the RAF and MoD, so, whatever the future of the base following the decision of November 2005, there is a positive framework which allows historic environment interests to be given due weight at the appropriate time within the flow of wider base management.

(b) It involves mostly local designations, so what will be a planned extension of routine for the RAF could become a significant extra demand upon the resources of West Lindsey District Council as local planning authority.
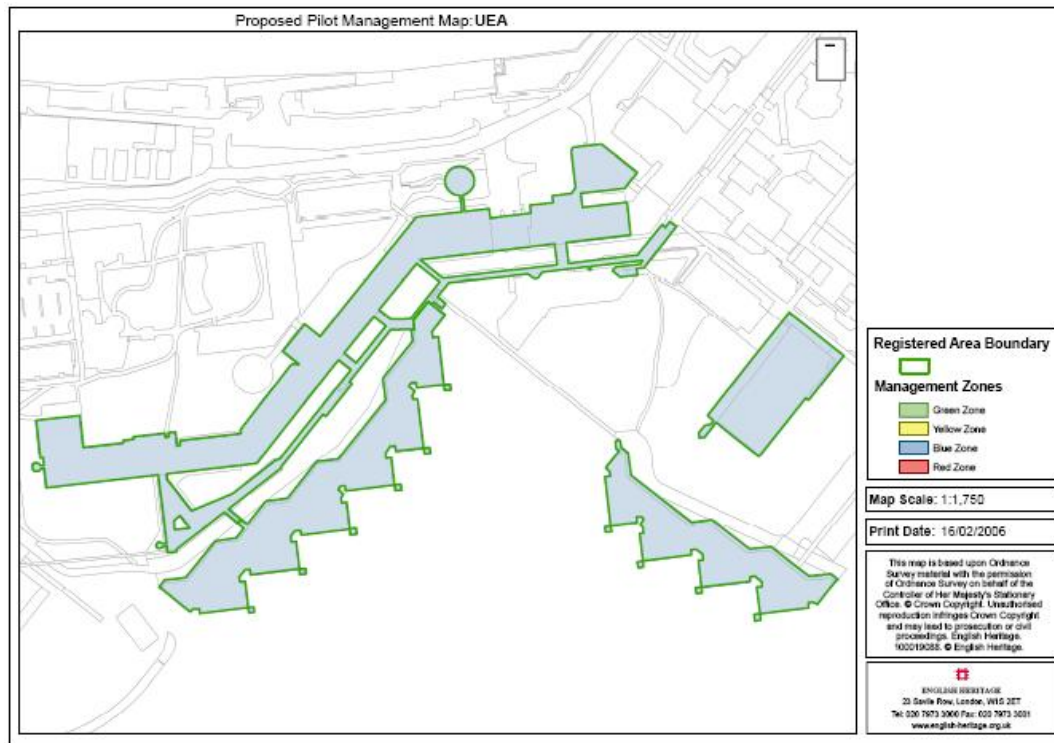
Proposed Pilot Management Map: RAF Scampton

RAF Scampton: Management Zones for (currently) scheduled, listed and unlisted historic assets

5.8   The late listing of the buildings at **UEA** (2003) makes it difficult to estimate savings, and the fact that Norwich City Council and UEA are already operating an informal system of pre-agreeing works adds to the difficulty. The benefit of the HPA in relation to the unified designation system comes in the flexibility for dealing with internal upgrading works that were always part of the original architectural conception.

UEA: Designated Lasdun buildings

(a) The HPA sits within a wider Conservation Development Strategy for the whole University site. This has the benefit of keeping a close focus on conservation and development needs together, but carries the risk that distinctions will become blurred.

(b) For UEA the benefits of the CDS / HPA are that it will inform a system in which all works are controlled by the Estates and Buildings Division. It is notable that the CDS applies to much more of the University than the four sets of designated structures, though others are expected to be designated in the future. This gives an advantage in the scope for coherent conserving maintenance policies covering buildings otherwise outside normal controls.

(c) For Norwich City Council, it will save time and reduce the workload on its Conservation Officer staff which has been reduced from 3.5 to 2, but there is uncertainty about how much extra time will be needed for monitoring.

(d) The level of permissive works in this HPA shows the device is useful for modern buildings with intensive institutional uses; here, at least, it seems relatively easy to identify essentials of historic or architectural character and appearance as distinct from subsidiary service and short-life fittings whose renewal is an expected part of continuing usage.

5.9   Overall savings at **Weld** may not be great, given the relatively small number of assets involved, unless a successful negotiation allows an HPA that covers all the estate's holdings. At the present limited pilot level of inclusion, savings compared with the old system might be less because there are two other separate management agreements operating on the Estate. In terms of benefits from a unified designation system, Weld has a complexity and variety of assets as great as Kenilworth, but also the potential advantages of management as part of a single ownership.

Weld Estate: North Lodges (DB)

(a) This pilot illustrates the difficulties of parties who would like the perceived benefits of an agreement but do not feel that other parties would be able to deliver them.

(b) The obvious potential benefit of an HPA is that it would be a means of removing the mutual suspicion that exists between the owner and the local planning authority.

(c) In principle, the new process might be attractive to the District Council as a model that could streamline and regularise its dealings with several similar large estates, reducing the instances of possible or actual unauthorised works, and increasing insights into the problems faced by those estates in changing agricultural and economic circumstances.

Developing conservation partnerships

5.10   A principal benefit of HPAs is the need to develop conservation partnerships between the main interested parties, usually the land or asset owner, the local planning authority and English Heritage. These are seen as working relationships towards agreed ends rather than episodic confrontations with the land-use planning system. They also include a wider circle of involvement with other stakeholders, local interests, amenity societies and others. This section considers the nature of the partnerships exhibited by the eight pilots together with the pre-requisites for their successful operation.

5.11   The eight partnerships can be *categorised by ownership* as private, involving one or more private owners, the local planning authority and English Heritage – **Darnall** (two owners), **Kenilworth** (part), **Weld**, and institutional, involving a governmental or public sector owner, the local planning authority and English Heritage – **Cornwall Bridges etc**, **Kenilworth** (two of three owners), **Langdale**, **London Underground**, **RAF Scampton**, **UEA**. Superficially this might suggest private ownership has not been sufficiently tested, yet HPAs are most relevant to the larger sets of holdings of historic assets.

5.12   As far as can be seen, *negotiations setting up the partnerships* went relatively smoothly, despite the disruption caused by English Heritage's own internal reorganisation. Drafts of the HPA were circulated and duly amended; this seems to have been a crucial stage in explaining the new approach for those least familiar with heritage management, such as the base staff at **RAF Scampton**. There is an issue about owners' advisers; both the Warwickshire County Archaeologist (**Kenilworth**) and the Infracos (**London Underground)** felt they should have been involved at an earlier stage. Negotiations have generally helped forge partnerships of their own volition, though support from the London Boroughs for the **London Underground** HPA was qualified by doubts about whether it would add anything, and those over the **Weld** Estate have had the effect of crystallising unresolved tensions between the owner and the local planning authority.

5.13   Otherwise, *consultations in the wider circle of potential or actual stakeholders* varied according to the nature of the pilot. There were none for **RAF Scampton**, a closed military base with high security needs. Those for **Darnall** have been limited initially because a private owner was involved, so the scope for communication with the

local community at Darnall and Sheffield conservation interests has yet to be fully explored. At **Kenilworth** consultation with often hostile local interests had the effect of bringing them into a supportive position. At **Langdale**, where there is little conflict between heritage management and farming interests, commoners' associations provide a continuing vehicle for communication. The dimension of the national amenity societies was catered for at **UEA** and **London Underground**, and has usefully flagged up some general conservation issues that need to be resolved before deemed consents are introduced.

5.14   The particular *organisational structures of the partners* are a significant consideration.

(a) All owners except **Darnall** rely to varying extents upon agents or associated arrangements for the kind of maintenance and repair works covered by the HPAs. These range from CORMAC, Cornwall County Council's Direct Labour Organisation (**Cornwall Bridges etc**), to the Infracos (**London Underground**) and an estate joinery (**Weld**). The ability of owners to control these agents is a factor that has to be taken into account when developing an Agreement.

(b) HPAs have the scope for normalising the relationships between partners' multiple interests, most clearly demonstrated at **Kenilworth** where English Heritage has three (Regional casework, Property Management, Designation), and Warwick District has three (Planning, Leisure and Parks Maintenance).

(c) In some instances the success of an HPA may depend upon particular personalities. At **UEA** the Estates Director has obviously been a key driving force, and when he retires in three years' time care must be taken to ensure that he

is followed by equally effective successor arrangements.

5.15   One area of concern is the extent to which *legal aspects* have been taken into account in developing the pilot HPAs, which are as yet unsupported by legislation. Few of the District Council officers knew whether their legal colleagues had scrutinised the draft agreements. At English Heritage the centre was considering them but had not yet pronounced. **RAF Scampton** was uncertain whether approval should be given by the Station Commander, Strike Command or even MoD.

5.16   Possibly there is some confusion arising from piloting Agreements referring to legislation not yet enacted, dealing with management agreements and the pre-agreement of some (but not all) repairs, activities that are both possible under existing legislation.

Resources

5.17   Experience so far has shown that HPAs will require intensive resourcing at their initiation phase because of the time invested by the partners in producing the agreement. The resources needed to produce an HPA will be reduced if clear guidance and templates are provided to all partners.

5.18   Over time, HPAs will lead to a net saving of resources for all involved. This will come from:

(a) pre-agreement for works: either where an owner has plans for multiple consent applications, or agreement can be reached on the type of works were consent is not needed. There will be savings in time and expense for both owners and local authorities.

(b) using the HPA to inform and improve the quality and understanding of future applications for consent.

5.19   Less tangible but no less real benefits will stem from the development of a real understanding between the local authority and owner about the significance, management and future plans for the site.

Preparation costs: HARs

5.20   The table below shows reported time for the eight pilot projects. Two background factors should be taken into account.

(a) This was a new process, so has generally taken longer while people learnt how best to do it and what pitfalls to avoid. HP Advisers working on **Kenilworth** thought about half the time would be needed on future occasions.

(b) The reorganisation of English Heritage, including the regionalisation of HP staff, caused disruptions in line management and required new people to finish what others had started; **Cornwall** was an example of the former, and **Darnall** of the latter. All this amounted to more disruption than would be expected in the normal course of staff turnover, holidays, sick leave, maternity leave etc. It may have been a critical factor in preventing systematic and comparable time-keeping records being maintained. Where time records were available, moreover, as in most cases, it was not possible to ascertain that they were strictly comparable.

Time in days	HAR prep	HPA prep	Time savings
Cornwall	*EH*: scoping 2, main 30, site visits 8, internal meetings 5, maps 2 hours. *CCC:* main 1, HER 2 hours 4 partner meetings	*EH:* main 15, admin 2 architect 2 *CCC*: 5	3 months over 29 months
Darnall	*EH*: preliminary research 10, preparation / editing 10, consultation / meetings 6 final draft 4	Included to left	Reduction in applications on existing designations, increase in new notifications
Kenilworth	*EH*: 30	*EH:* 10 (3 agreements)	Monitoring increase for LA, decrease for EH
Langdale	*EH*: site visits 10, partner meetings 12, HARs etc 50 *LDNP*: maps 0.5	*EH* 10 *LDNP* 5	New designation but workloads not expected to increase
London Under-ground	*EH*: HARs 5	*EH* 20	Uncertain whether all current consents are sought. Could add to LA load
RAF Scampton	*EH:* HARs 24	*EH* 8 *RAF/DefEst:* 8 large internal meetings, many ad hoc ones	Crown exemption confuses. More demand on DC
UEA	*EH*: minimal	*UEA:* £60k over 5 years, 18 days ? *EH Region*: 4 *EH HPA*: 14.5	Replace 10-12 applns p.a. Workload on NCC
Weld Estate	*EH*: 15.5	*EH*: 21	Could be extensive for owner and LA with a workable HPA

5.21 Generally, the process of preparing new-style HARs has to settle down with the tried and tested desk instructions that were evolving during this assessment firmly in place. These and proper monitoring ought to keep the time and costs of outputs under predictable control, and that ought not to be more demanding than recent work on MPP and the Registers. However, with a process deliberately intended to maximise communication about the significance of newly described assets, care should be taken to avoid putting field staff into the kinds of timetable straight-jacket that weakens the quality of product, as did happen on occasion with the listed building resurvey programme of the 1980s.

5.22 Several variables affected the time required to prepare HARs. These included:

(a) in the case of Scheduled Ancient Monuments whether they had recently been covered by the Monuments Protection Programme (MPP), which delivers well-researched and described entries doing much of the basic work for a Register Entry and Historic Asset Description, as with the **Kenilworth** monuments.

(b) in the case of listed buildings whether recent addition to the list had brought a good description, as was the case with the Lasdun buildings at **UEA**.

(c) whether substantial background thematic research existed, providing a ready-made basis

- either for identifying what is significant and should therefore be included, as at **RAF Scampton** with the work on Historic Military Aviation Sites, and at **Darnall** with the intensive pre-HPA survey work had been done by English Heritage and commissioned work by ARCUS

(Sheffield University) as part of Master Planning

- or for directly drafting asset descriptions, as with the 1980s **Langdale** survey and the work of several enthusiasts on the **London Underground**.

The presence or absence of such work – which is the essence of 'Informed Conservation', understanding what you have before you decide what to do about it – could make a large difference. There is probably a positive correlation between groupings that merit HPAs and those that have already been the subject of research, especially through the thematic studies generated by the MPP.

5.23 There are definite benefits in having these new style HARs, subject to the discussion of presentation and format above (Section 3). They will be able to justify designation and communicate the interest of the asset much more clearly than was possible with the old scheduling and listing descriptions, which were primary concerned with ensuring the asset in question was correctly identified. In that sense they represent a further evolution from the improved descriptions in the Registers and MPP documentation.

Preparation costs: HPAs

5.24 A range of times were reported for the preparation of the actual Heritage Partnership Agreement, with typically English Heritage about 10 working days and the asset owner about 5 days. But the requirement is clearly variable according to circumstances, and it is not realistic to quote an average time at this stage. For **Langdale** it was so much 'business as usual' for the landowner, the National Trust, that it was regarded as part of normal routines. For the **London Underground**, a prescriptive 'traffic lights' approach required most work on the first station, creating a model that

could then be applied easily and rapidly to the other stations.

5.25   Another factor was the extent to which the organisational culture and objectives of the prospective partners coincided, a matter likely to improve with an established system.

(a) Where it was simply a matter of making a system perceived to be cumbersome work better, as for **Cornwall** and **Darnall**, the main change was technical.

(b) Where the asset owners had their own approaches as part of a larger management task, the negotiations were more complex.

- At **RAF Scampton** the HPA took the form of Management Guidelines that have to key in with existing base and MoD procedures; the frameworks for military and heritage thought-processes met only when a first draft of specific guidelines was tabled.

- At **UEA**, the HPA will be effectively subsumed within a broader Conservation Development Strategy for the campus, which ambitiously seeks to provide a framework for resolving the tensions between development and conservation.

- At the **Weld Estate**, poor relations between the owner of the assets and the Local Planning Authority prevent the development and implementation of an agreement that all parties acknowledge in principle as potentially useful.

Running costs

5.26   An indicator sought here might be the time that has to elapse before the savings arising from the new system pay back the costs of preparing and initiating it. 'Costs' should include those of the main partners, namely the asset owner, the

local planning authority, and English Heritage, and should take several variables into account.

5.27   One is the type and circumstances of scheme, whether dealing with one or several types of asset, a small or large area, and few or many competing interests. The greater the complexity of the existing situation, the more scope there should be for its simplification. At **Kenilworth**, where several owners have more than one type of asset and the local authority has several departmental interests, the scope for simplification is probably greater than at **Langdale**, where, though the area is large, the asset type and the pressures on it are relatively simple.

5.28   Related factors are asset vulnerability to decay or wear requiring repairs and the pressures of competing land-use interests. These are likely to be high at **UEA** and relatively low at **RAF Scampton** if it stays in a semi-mothballed condition.

5.29   In cases where an HPA has the effect of either tightening up or introducing procedures that ought to have existed anyway, the scope for savings may be smaller, though the reasons for the earlier unsatisfactory situation may themselves be related to resources. In at least two of the pilots, the conditions probably do exist for unauthorised works to have been undertaken by accident or design, and the control of these works through the notification process would be facilitated by an HPA.

5.30   In cases where aspects of the new scheme are already in place using other mechanisms, the scope for savings may be small. This comment mainly applies to Section 17 Management Agreements, and the obvious example is **Langdale**. It is more problematic over buildings: the same small scope for savings may exist on account of the existing pre-agreement arrangements operated by the London

Borough of Enfield at the **London Underground** station of Turnpike Road and the arrangements between Norwich City Council with **UEA**, but it is noteworthy that both the latter parties want the security of legally clarified procedures.

Potential savings of time and costs

5.31   Potential savings in time and costs arising from HPAs need to be hedged about with many qualifications, given the difficulties of quantifying savings in advance of implementation, and the even greater difficulties of extrapolating from pilots, themselves an exploratory mechanism, to a wider universe in which HPAs are a standard option.

5.32   In order to assess the likely benefits and costs to partners, it is necessary to take into account the resources required to prepare the Historic Asset Records and the Heritage Partnership Agreements, and to compare the resources required to run the new and old systems. These are not simple calculations. Any one pilot is no more than a tentative indicator; eight of them are the more successful of a larger number of schemes. There is little clarity about global figures for a potential total population of HPAs.

5.33   It is also important to keep HPAs in perspective. Their purposes are limited, to deal with the lesser end of the spectrum of changes that can affect historic assets. Works requiring formal consent will still be in the majority and will still require the usual processes of preparation, investigation, negotiation and monitoring.

The number of instances where an HPA is suitable will be limited, and dependent upon the grouping of ownerships and willingness for partnership on all sides. Yet, sensible arrangements about minor changes can improve understanding, negotiation and process over more substantial changes.

5.34   With these qualifications, and bearing in mind caveats expressed elsewhere in this report, it is possible to summarise the extent to which the pilots seem likely to bring on-going benefits. These benefits are of two kinds that should be seen together, **financial**, resulting from reduced staffing and other costs incurred by all parties to an HPA, and **process-based**, a combination of the administrative and the political, doing what has to be done more efficiently and in ways that are more open and transparent.

5.35   The table below attempts the almost impossible task of tabulating financial and process benefits for the three main partners in each pilot project. Numbers have been assigned intuitively and are representative rather than arithmetical; people more deeply involved with the pilots might well assign values differently. The figures should never be quoted in isolation and may help indicate relative performance between pilots and the range of outcomes between positive and negative for each one. Obviously it is difficult to compare cases where existing designations are carried forward into the new system with cases where their inclusion is part of the pilot process or where designation has been recent such as at **Langdale**, **RAF Scampton** and **UEA**.

Pilot	Time and Costs				Process				Overall			
	Owner	LA	EH	All	Owner	LA	EH	All	Owner	LA	EH	All
Cornwall	1	0	2	**1**	2	*-1*	2	**1**	1.5	-0.5	2	**1**
UEA	*1*	*0*	*0*	***0.33***	*2*	*2*	*1*	***1.67***	*1.5*	*1*	*0.5*	***1***
Kenilworth	1	-1	2	**0.67**	1	0	1	**0.67**	1	-0.5	1.5	**0.67**
Darnall	1	-1	1	**0.33**	1	1	1	**1**	1	0	1	**0.33**
London U'ground	0	-1	0	**-0.33**	1	1	1	**1**	0.5	0	0.5	**0.33**
Weld	1	-1	0	**0**	1	0	0	**0.33**	1	-0.5	0	**0.17**
RAF Scampton	*0*	*-1*	*1*	***0***	*1*	*-1*	*0*	***0***	*0.5*	*-1*	*0.5*	***0***
Langdale	*0*	*-1*	*0*	***-0.33***	*0*	*1*	*0*	***0.33***	*0*	*0*	*0*	***0***
Average	0.625	-0.75	0.75	**0.209**	1.125	0.375	0.75	**0.75**	0.875	-0.188	0.75	**0.44**

Italic = pilot with all or substantially new designations.

Time and Costs:
Savings: 2 = many; 1= some;   0 = neutral   Costs: -1 = some extra; -2 = many extra
Process:
Benefits: 2 = many; 1 = some;   0 = neutral   Disbenefits: - 1 = some; -2 = many

Constant values are kept in all aggregative cells through dividing by 8 or 3 as appropriate

5.36   Time and costs seem likely to reduce for the owner and English Heritage by nearly 'some', but increase by the same amount for the Local Authority, not a wide indicative range. The contrast in demands upon English Heritage and the Local Authority will increase in situations where currently English Heritage takes the lead or tends to substitute for Local Authority expertise that is lacking. **Process** seems likely to improve for all three parties, with a slightly greater indicative range, slightly more than 'some' for owners, towards 'some' for English Heritage, and about half that level for Local Authorities. Overall there would be an improvement halfway between 'neutral' and 'some'.

5.37   Explanations for the achievement of individual pilots within this framework can be sought in the inter-relationships of several factors, including

(a) the extent to which similar devices available under existing legislation are already being used

(b) the extent to which the owner's property management interests are related to economic, social and cultural activities

(c) the extent to which a local authority currently has the capacity to operate the existing legislation

5.38   Cornwall's positive score reflects a pilot with assets wholly in the public domain, no fundamental clashes of interests given good communication, relatively little anticipation of HPA arrangements, and sufficient collaboration between the two tiers of local government to facilitate operating capacity.

5.39   UEA, with an equally positive but more speculative score, has other agendas in the form of the *Conservation Development Strategy* that provide a

positive context (though they also represent the scope for partners hoping to stretch the agreement on repairs and minor works to cover more substantive change). The drivers are strongly economic but for a clearly defined social purpose.

5.40 **Kenilworth** scores well because it involves assets that are mostly in the public domain for cultural purposes, and HPA holds out the prospect of simplifying arrangements between two public bodies each with their own sets of functional or departmental interests.

5.41 With **Darnall** there is a significant drop in advantage because the HPA is seen as a normalising mechanism for what already exists, but in a primarily economic context. An experienced conservation architect acting for one of the owning companies wonders whether they are actually particularly onerous extensions of statutory mechanisms.

5.42 With the **London Underground**, another public service set of assets, the extent to which HPA arrangements are anticipated by intelligent use of listed building control and the extent to which there is uncertainty about the existing performance of sub-contractors combine to give a lower score for benefits gained.

5.43 The values assigned to **Weld** assume that current difficulties can be ironed out and take into account other existing agreements.

5.44 **RAF Scampton's** own system of *Management Guidelines* and the military framework makes for a pilot where the systems will be introduced anyway and will apply largely to undesignated assets.

5.45 That **Langdale** should come out with a 'no change' score reflects the extent to which the management agreements already in place replicated what an HPA is intended to achieve.

Scope for replication

5.46 A test of the pilot schemes is whether they appear to be capable of application to other sets of assets. Again, this is difficult to judge without a reasonable running period, perhaps at a first review after three or five years.

5.47 Potential owner-partners may well find HPAs attractive, correctly as a better way of doing things that have to be done, but incorrectly by confusing the removal of excessive bureaucratic process with the removal of reasonable constraints. At times that pressure seemed evident at **UEA**. There is a risk that outsiders aware of HPR will think that every site should have an HPA when in practice it will be only a minority.

5.48 Potential local authority partners may see them as a way of dealing efficiently with certain types of owner in their area, but there will need to be competent staffing in both partners for this to work. Purbeck District Council sees other estates to which the **Weld** model might apply, but might feel it would need to strengthen its conservation staffing provision. Sheffield City Council officers are interested in the wider implications of the HPA at **Darnall**, but are concerned about the costs of drawing up agreements and policing them. Both universities in Sheffield have estates with listed buildings that might benefit from HPAs. There is an opportunity to deal with SCC's own estate in this way, but skills are an issue; a dedicated team looks after Sheffield Town Hall but not the rest of the estate.

5.49 As a very broad generalisation, the seven of the eight pilots divide into two categories, dispersed assets of a similar type under one ownership (**Cornish Bridges etc, London Underground**), and discrete agglomerations that might be described as estates. The estates range from landscapes like **Langdale** through

classic country holdings like **Weld** to industrial estates like **Darnall**, a campus like **UEA** and an enclosed military base like **RAF Scampton**. The odd one out is **Kenilworth**, a collection of related assets in different ownerships made viable by dominant public ownership.

5.50 The **London Underground** projects ended up as a sample of a sample, taking only three stations through to the full HPA. The principles embodied the HARs and the HPA ought to be applicable to the whole range of (a) Holden stations on all lines (b) other historic stations on all lines, only seeking to control what is significant.

5.51 In principle there seems no reason why HPAs could not be devised for other examples of these categories, but with certain caveats.

5.52 The larger the landscape, the more important it will be for owner interests to be conservation-based. The circumstances of the **Langdale** pilot were unique: it is a very large and inaccessible area with a non-typical site type and a rich variety of remains; there are few landowners and the principal stakeholders are enthusiastic.

The same strategy would not necessarily work for large multi-period upland landscapes elsewhere – variable factors would have to be identified and the model tested against them before decisions were taken to proceed. A key issue is whether this approach is widely applicable elsewhere to other sites currently outside the perceived remit for scheduling and its subsequent management regimes.

5.53 The more organised the estate, especially if management or conservation plans exist, the easier it will be to integrate an HPA with them. Conversely, if primary non-conserving uses have already generated their own framework, as nearly happened at **RAF Scampton**, it may be more difficult to insert new structured requirements and easier to continue seeking consents on a case-by-case basis. Indeed, **RAF Scampton** illustrates the value of having a good formal framework that reads through from policies and principles to detailed specifications, brings forward advance plans in good time so that they can be discussed and agreed and thereby gives reasonable certainty that agreements will be honoured in detail.

RAF Scampton: overview (EH)

6 Conclusions

Management of the project

6.1 The pilot HPAs have suffered from a mid-stream reorganisation of English Heritage's staffing structure, but in general the impact has been mainly on timing rather than on quality. An apparent timing issue was the way the HAR template was being developed while HARs were being drafted, but the later revision of the original template could not have been achieved without feedback from practical experience.

6.2 As indicated above (Section **3.11** – **3.28**), tighter control could have been exercised over the compiling of the HARs, but equally there was a case for experimentation driven by the wholly commendable aim of improving communication with users. What matters is that lessons are learnt and that in future HARs exhibit a consistent format that will meet the expectations of readers, with diversity of content confined to the diversity of the assets described.

6.3 The reorganisation did affect communications, about the launch of the pilot programme generally, between centre and regions, and between potential partners. In the main, however, and separating out the perceived problems of communication that reflect concern about change, difficulties have been recovered by conscientious staff more aware of problems for being based in the regions.

6.4 An aspect of communication is ensuring that approaches to local authorities as potential partners are made at the right level. Relatively junior staff who are professional colleagues need to know informally from the outset, but formal approaches at a senior and consequently political level have a better chance of garnering corporate support and joined-up thinking across more than one department. English Heritage reports all

Chief Executives were approached and asked to participate, so the difficulty may have arisen over following up non-responses. County specialist teams with a formal advisory role also need to be in the loop from the outset.

6.5 A factor in the smooth running of pilots was whether designation staff, who work separately from regional casework staff, either had casework experience, or were able to work closely with casework staff. Casework experience is essential for the compilation of realistic and workable HPAs. It is important that excesses of organisational propriety do not make HPAs more difficult to progress than need be the case, especially when owners will be looking for a reasonable grasp of the issues as they see them.

6.6 By the same token, it is important that the development of HPAs does not get entangled with separate negotiations about conservation grants given or advised upon by English Heritage. Unlike existing Section 17 management agreements under the 1979 AMAA Act, there are no financial considerations, because they are about facilitating a range of relatively simple works rather than specific management tasks.

Specific requirements of the Brief
(Sections **1.10** – **1.12** above)

6.7 In *outlining the existing heritage protection system operating in the pilot areas*, this study has identified a mixture of existing arrangements which are:

(a) working well (**Langdale**)

(b) stretching the limits of legality in order to support positive management regimes not generally envisaged when the legislation was originally drafted (**UEA**)

(c) not able to deal adequately or efficiently with modern conservation requirements due to deficiencies in powers or the accumulation of top-heavy process in existing legislation (**RAF Scampton**, **Cornwall Bridges etc**).

The availability of sufficient specialist resources within local authorities is an important factor which can make all the difference in being able to use existing legislation properly (**Weld**).

6.8   In *reviewing the progress made by the EH pilot projects towards delivering the HPR recommendations of new designations and new management arrangements for historic sites and identifying the costs involved in delivering these new arrangements,* difficulties have been encountered as explained above in Sections **6.1 – 6.7**. If agreements have not been concluded then arrangements cannot be in place, especially if a new legal framework is needed; as explained above, piloting always costs more and one of its aims is to work out ways of doing the main task as cost-effectively as possible.

6.9   In *investigating the likely impact of the new arrangements on future management of the pilot sites, including an assessment of likely cost-benefits* regard must be had for financial aspects as discussed in Sections **5.17 – 5.45**, and for the extent to which it is possible – as shown by some pilots – to achieve some of the management regimes through existing legal mechanisms.

6.10   In *exploring the experiences and perceptions of partners and other stakeholders in developing & managing pilots together with the perceived / likely benefits of new-style designations and new statutory management agreements*, it is important to recognise that the pilots generally represent successful projects. Also, such outcomes are in themselves an indicator, not only in general, but also in particular about what is more likely to

succeed than fail. It is notable that partner experience has generally been positive; there is undoubtedly an improved perception and understanding about what is being conserved, how it is done, and in whose interests. This may seem a 'soft' indicator but it is a crucial one if there is any real meaning in policies for improving access and inclusion regarding cultural / environment assets. It has the potential to make the conservation process something that is achieved together <u>with</u> owners in an understood public interest rather than something that it done <u>to</u> them by the apparatus of the state.

6.11   The requirement *to make recommendations on the applicability of pilot project arrangements for other historic sites* and to identify *the characteristics of a successful pilot project, where stakeholders are positive about both process and outcomes* has been discussed partly in Sections **5.46 – 5.53** above. The characteristics of success might be listed as:

(a) an asset / set of assets of sufficient complexity and with sufficiently definable maintenance needs for the provisions of an agreement to usefully simplify its / their management

(b) an ownership structure of sufficient clarity and simplicity with sufficiently conserving asset usages in order to facilitate the making and implementing of an agreement

(c) sufficient interest in the significance of the asset(s) from the owner to want to ensure its proper care and future survival

(d) the existence of adequate specialist expertise in the local planning authority and a willingness on the part of the authority to give the operation of the agreement due priority

(e) adequate staff resourcing and channels of communication between the local

planning authority and English Heritage to ensure a responsive approach to issues arising from operating the agreement.

General requirements of the Brief

6.12   The Brief for this project indicated that the "EH pilots were tasked to test out the most innovative aspects of the proposed new system", and the task of this project was to test the pilots.

6.13   One aspect is the "single unified system, called the Register of Historic Sites and Buildings of England that gives equal statutory recognition to different components of the historic environment formerly accorded varying status as listed (building), registered (parks, gardens and battlefields), and scheduled (archaeological sites)".

6.14   The examples seen of Register Entries and Historic Asset Records in the eight pilots suggest that a single system is entirely feasible. Work is needed on ensuring compatibility of information requirements across asset-types, and on achieving a realistic balance between entered and referenced information, but, just as previous designation staff learnt how to apply B-DAMP FISHES and compile extended scheduling descriptions, so present and future staff will be able to work out and apply the new requirements.

6.15   A second is "a single designation regime that allows separate archaeological, architectural and landscape elements all found on one site to be treated as one entity". Though historic assets matter for their particular significance, which varies between types of asset, it helps owners and managers to be able to concentrate on the significance-sensitive parts of the asset and on what kinds of generic works need the expertise flagged up by special controls.

6.16   The corollary is that curators accustomed to think in terms of

'archaeology' or 'buildings' will have to develop similar skills, and be prepared to operate intelligently across the whole range at an administrative level, knowing when to call upon specific expertise for support. Specialised knowledge must become something that is managed so that it can be applied to the right situation, and cease being a reason for not looking outside its confines.

6.17   A third, the "the establishment of statutory management agreements that allow for strategic management of sites over the medium to long term", goes to the heart of this assessment project. On the basis of the evidence obtained from these eight pilots, is it worth proceeding with them and incorporating them as has been proposed, as a cornerstone for the new heritage protection regimes? Or are they of only marginal utility compared with existing arrangements, and from the user viewpoint more professional self-indulgence than a genuine step-change?

6.18   Undoubtedly the pilots are capable of producing savings, some more than others, and some with a longer pay-back time for the resources needed to put them in place. But accurate quantification is difficult working from a pilot partly disrupted by external circumstances. Developing a system and learning how to operate it always costs more than running it and reviewing it routinely.

6.19   During this assessment, several participants in pilots said that they were able to achieve the equivalent of HPAs through Section 17 management agreements or pre-agreed listed building repairs. That reflects good use of existing systems. But Section 17 agreements involve a financial consideration to support specific works with deemed consent, which is different from a general agreement about how to handle the range of works with generally the lowest level of impact. There might be little difference between old and new systems about pre-

agreed listed building repairs, except that qualifying categories would be clarified and site inspections usually confirmatory rather than determinative. Both devices could be carried forward into the new system, with the Section 17 management agreements becoming part of the grants regime clearly separate from HPAs.

6.20   The sceptical view of HPAs that amounts to 'if it ain't broke don't fix it' probably covers two strands of opinion in varying proportions.

(a) One is an innate conservatism, dislike of change to procedures whose tortuosities have become familiar and which are proven to deliver results.

(b) The other is a hard-bitten concern born of past experience that arrangements based on a degree of trust are risky and that the historic assets will be the losers. There is a real fear that too many local authorities are not adequately resourced with specialist staff to act as the partner in an HPA, let alone as the gateway under the proposals of the Heritage Protection Review. Linked with this fear is another, that political pressures for 'modernisation' will allow ambitious owners to demand and get HPAs for inappropriate assets or sets of assets, and with them a new form

of exemption from controls reasonably exercised over their private property in the name of the public good.

6.21   HPAs will need to be supported by an adequate level of resources in local authorities, for the negotiations that set them up and their continuing operation. It is unsafe to regard HPAs as a source of potential 'efficiency' savings in local authorities whose resources and priorities for conservation work already preclude similar schemes and do not stretch to routine monitoring and enforcement.

6.22   It is therefore important to keep in mind the broader political objectives behind the Heritage Protection Review, not to decrease levels of protection, but to involve more people in more intelligible processes (and results) of conservation. This is probably the key benefit that can come from properly devised and well-managed HPA partnerships.

6.23   In the context of the wider Heritage Protection Review, the eight pilot schemes provide sufficient evidence to justify normalising often ad hoc and disjointed existing arrangements in a more cooperative approach that combines partnership, clarity of roles and review of progress in proportionate measures.