

# **Implementing the Heritage Protection Reforms: A Report on Local Authority and English Heritage Staff Resources**

Produced by English Heritage, the Association of Local Government Archaeological Officers and the Institute of Historic Building Conservation  
May 2009

## **I      Executive Summary**

- 1.1 This report examines staff resources for archaeology and building conservation within local authorities, particularly within the planning process<sup>1</sup>. It also reports on the English Heritage staff resource working with local authorities on planning-related and grant-aid work. It has been produced by English Heritage (EH), the Association of Local Government Archaeological Officers (ALGAO) and the Institute of Historic Building Conservation (IHBC).
- 1.2 This report is an important part of the evidence base which will inform the introduction of the Heritage Protection Reforms (HPR). It also responds to the concerns expressed by some in the historic environment sector, and the Parliamentary Select Committee on Culture, Media and Sport, regarding the capacity of local authorities to implement the reforms set out in the draft Heritage Protection Bill, published in April 2008. The report is based on research of local authority staffing carried out by ALGAO and IHBC, plus information on staff within English Heritage dealing with planning advice and grant aid. It provides a provisional list of the tasks which historic environment local authority staff carry out, and establishes the age profile of these staff and those in comparable jobs.
- 1.3 The ALGAO figures show that the number of archaeologists employed in local government has increased over the past ten years, with a small drop between

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<sup>1</sup> In many local authorities building conservation and urban design are combined, in whole or in part, because of what are often shared aims in place-shaping and master-planning. In this report, therefore, building conservation should not be taken to exclude urban design where local authorities have combined conservation and design sections.

2006 and 2008<sup>2</sup>. The reason for this drop requires further investigation. The IHBC figures, for 2003, 2006 and 2008, show a similar profile<sup>3</sup>, and again the drop between 2006 and 2008 will be explored further. Building conservation staffing is variable across England; in some local authorities, building conservation is well-provided for but others appear to lack any specialist provision at all.

1.4 Over the period of the reduction in local authority building conservation staff between 2006 and 2008, the numbers of listed building and conservation area consents has risen, and faster than planning permissions. This has led to increased pressure being placed on local authority historic environment staffing provision from the 2006 position. The staffing figures were collected during the autumn of 2008, so the full impact of the recession on local authorities cannot yet be factored in. Anecdotal evidence of more recent local authority historic environment job cuts suggests the overall historic environment service is under greater pressure. **Further cuts could significantly affect local government's ability to maintain an essential element of its statutory planning services and incorporate the Heritage Protection Reforms that all agree are necessary.**

1.5 The list of historic environment tasks (see Appendix 1) includes legal duties under the Planning Acts; matters that local authorities should do in support of those duties; and other areas of work required by government policy that help ensure the historic environment is well cared-for. It is not possible for local authorities to discharge these duties appropriately, or take account of central government policies on the historic environment, without access to specialist archaeological and building conservation expertise. There is at present no system for reviewing local authority performance of these tasks, so it is difficult to assess both the current level of each activity and what level of future provision will be necessary. A second phase of the current research, on the detailed duties, powers and responsibilities of local authorities, will be published later this year.

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<sup>2</sup> ALGAO, *Local Authority Archaeological Services: Reports on Staffing and Casework Surveys, 1997-2008*.

<sup>3</sup> Grover, P., Viner D., Smith P. & Grover, H., *Local Authority Conservation Provision in England: research project into staffing, casework and resources*, 2003, and Institute of Historic Building Conservation, *Quantifying Local Authority Conservation Staffing 2006 and 2008*, 2006 and 2008. The status of the figures in the 2003 is discussed below at paragraph 4.1.

1.6 Heritage Protection Reform in terms of the draft Heritage Protection Bill will not have a major impact on local authority staff requirements, as completely new responsibilities for local authorities are limited to the handling of a relatively small number of the future equivalent of scheduled monument consent applications, and central government is committed to funding any new responsibilities. However Heritage Protection Reform (HPR) in its widest sense of promoting closer integration of the planning processes and community interests, may well bring wider resource implications, even if they are less easily measurable at this point. Again, the second phase of this research will enable a firmer foundation for a better understanding of the wider impacts of HPR.

1.7 This report demonstrates that, contrary to the some of the views expressed to the Select Committee, the age profile of local authority staff working in archaeology and building conservation is not significantly different from those of other professional groups, and is therefore not a heritage-specific crisis that some had suggested. The age profile for archaeologists is actually younger than the average. This is therefore not an area for particular concern at the present time, but changing patterns will need to be monitored in future to allow a response should worrying trends emerge.

1.8 The report recommends:

- Further work on local authority duties, powers and responsibilities under the planning acts and related legislation and policy guidance, to provide possible models for effective historic environment services in local authorities.
- Carrying forward the ALGAO and IHBC surveys on a regular basis, annually at first, to understand better the trends in local authority historic environment staffing.
- Pressing CLG and DCMS to issue a statement reaffirming that historic environment services are integral to the statutory planning responsibilities of local authorities, and discouraging cuts in historic environment staffing during the current economic downturn.

- The collection by the Department for Communities and Local Government of development control figures on a wider range of planning permission categories to understand better the workload of historic environment staff.

## 2 Introduction

2.1 This report has been produced by English Heritage jointly with the Association of Local Government Archaeological Officers (ALGAO), which leads on local government archaeology, and the Institute of Historic Building Conservation (IHBC), which similarly leads on local government building and area conservation.

This report has three objectives:

- to establish baseline information on staffing resources for the historic environment in local authorities and English Heritage;
- to record the tasks that are carried out by local authority archaeology and building conservation staff and English Heritage Advice and Grants' Team staff; and
- to compare the 2003, 2006 and 2008 data and give some analysis.

2.2 The focus of this report is on local authority historic environment staff resources and tasks but it also includes some assessment of the contribution made by the work of English Heritage as it relates to the planning system (in its wider sense including Scheduled Monument, Listed Building and Conservation Area Consents). An important building block is the agreement by all three organisations of a suite of key tasks for local authority historic environment services, their frequency and the impact of the Heritage Protection Reforms.

2.3 The background to the current report is the draft Heritage Protection Bill, published on April 2, 2008. This important and wide-ranging revision of the legislation for heritage protection is the culmination of a long process which goes back directly to the sectoral statement on the historic environment, *Power of Place* (published in 2000), and the ministerial response, *Force for our Future* (2001); its main provisions were foreshadowed in *Protecting our Historic Environment: Making the System Work Better* (2003) and the *Heritage Protection White Paper* (2007).

The latter document outlined proposed changes based around three core principles:

- developing a unified approach to the historic environment;
- maximising opportunities for inclusion and involvement; and
- supporting sustainable communities by putting the historic environment at the heart of an effective planning system.

2.4 The improved heritage protection system would therefore take its place within the reformed planning system.<sup>4</sup> The desired result of heritage protection reform for local government historic environment services is ever better integration both within themselves and with other local services (as emphasised by current thinking on the planning system). Everybody agrees that better integration would be of benefit but that must not be at the expense of quality outcomes.

2.5 The current structure of historic environment services in local authorities is complicated; clearly, different service structures have developed to meet local needs. The broad outlines have generally seen archaeology sitting more usually at a higher-tier level (the County Archaeologist), with building conservation at a lower level, in district councils. Where there have been major changes in the recent past, they have tended to be the growth of archaeological advice at lower-tier level, particularly in larger, historic urban centres, and the continued move away from upper-tier based building conservation services, which, though often authoritative, can be seen as a survival from a time when planning was based at county level. Single-tier local government is spreading, however, from the city metropolitan councils and London boroughs to more recent unitary structures and the combined operations of national park authorities. Nine new single-tier councils have replaced dual-tier structures at the beginning of April 2009. Most single-tier councils have combined historic environment services, generally consistent with Heritage Protection Reform.

**Table I Types and numbers of local planning authorities in 2008<sup>5</sup>**

County Councils	District Councils	Unitaries	National Parks
34	238	116	9

<sup>4</sup> The number of wider reform and assessment strategies includes CABE's initiative *Moving Towards Excellence in Urban Design and Conservation* and the development of excellence models for comprehensive area assessments and local area agreements by IDeA and the Planning Officers' Society. Comprehensive Area Assessment has been developed by the Audit Commission to assess how effectively local public services are delivering improvements in quality of life and value for money for their local communities.

<sup>5</sup> This is the picture of local government in England on which this report is based. In 2009, the picture changes again with seven county councils and around thirty five district councils ceasing to exist and nine new unitary councils coming into being to replace them.

2.6 The Report of the Culture, Media and Sport Select Committee into the Draft Heritage Protection Bill<sup>6</sup>, published in July 2008, reflected widespread concerns in the historic environment sector about the resources available both in local authorities and at English Heritage for the administration of both the system as currently established and for the reformed system. It noted views from within the sector on the inadequacy of the Impact Assessment published with the draft Bill in April 2008 and unease both that the numbers of conservation officers in local planning authorities is insufficient for the task and anxiety that the age profile of the conservation officer profession would lead to a future crisis in the numbers of conservation officers operating in local planning authorities.

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<sup>6</sup> Eleventh Report of the 2007-08 Session, paragraph 27: 'We find the comments by DCMS and English Heritage that there is unlikely to be a shortage of conservation officers in local government in future years astonishing. There is already a shortage of conservation officers in the country and, aside from English Heritage, the sector appears united in its recognition that there will be not be the staff with the necessary skills to replace existing conservation officers once they retire. The statistics provided by the IHBC would seem to support this finding. We urge the Government and English Heritage to reconsider their approach to this matter. Conservation officers, in sufficient numbers and with adequate training, will be critical to the successful implementation of the Bill. We recommend that the Government sets out a strategy for maintaining sufficient numbers of conservation officers with the necessary skills.'

### **3 The List of Historic Environment Tasks**

3.1 The starting point in this consideration of historic environment resources has been the creation of a list of key tasks for a local authority historic environment service which are mentioned in legislation and government policy guidance and the allocation to each activity of a level of statutory duty, proactivity/reactivity and an assessment of the frequency of each task. This will assist with constructive discussion between all relevant parties on the way that historic environment services should be delivered locally. The full table of local authority activities is given in Appendix 1.

3.2 Local authorities are given specific duties concerning the historic environment by the various planning acts. These duties include:

- LPA planning duties with regard to listed buildings - Planning (Listed Building & Conservation Areas) Act 1990, section 66 (1)
- LPA duties with regard to listed building consent applications - Planning (Listed Building & Conservation Areas) Act 1990, section 16
- LPA control of works to listed buildings - Planning (Listed Building & Conservation Areas) Act 1990, sections 8 and following
- LPA duties to notify Secretary of State of applications for listed building consent - Planning (Listed Building & Conservation Areas) Act 1990, section 13
- LPA duties to consult English Heritage and National Amenity Societies - Planning (Listed Building & Conservation Areas) Act 1990, section 15
- LPA duties regarding designation of conservation areas - Planning (Listed Building & Conservation Areas) Act 1990, section 69
- LPA duties regarding appraisal of conservation areas - Planning (Listed Building & Conservation Areas) Act 1990, section 71
- Consultation of local planning authorities - Faculty Jurisdiction Rules (Care of Places of Worship) Rules (Statutory Instrument 2000, no. 2047), section 4
- Consultation of Historic Environment Record – GPDO, Article 1 (2), page 5
- Removal of hedgerows – Hedgerow Regulations (Statutory Instrument 1997, no. 1160), section 5
- Scope of Environmental Impact Assessments - Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations (Statutory Instruments 1999, No. 293), schedule 4 (3)

Much of this work concerns having ‘special regard’ (listed buildings) and ‘paying special attention’ (conservation areas)<sup>7</sup>. Addressing these questions, not only in the

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<sup>7</sup> The requirement in terms of planning functions concerning listed buildings (section 66 (1) of the Planning (Listed Building & Conservation Areas) Act 1990 is expressed as the need ‘in granting planning permission for development which affects a listed building or its setting, ... (to have) special

context of decision-making on applications but also in terms of helpful and timely pre-application advice for applicants, post-application monitoring and therefore also enforcement, is a matter for specialist staff and not a judgment which can be made by anyone with insufficient information or experience. That is why Planning Policy Guidance Note 15, for instance, makes it plain that local authorities should seek specialist advice: *Above all, local authorities should ensure that they can call on sufficient specialist building conservation advice, whether individually or jointly, to inform their decision-making and to assist owners and other members of the public* (paragraph 1.6 of PPG 15). This advice can be provided internally, by the authorities' own historic environment service, or externally, by consultants. The growth of private sector specialist knowledge, particularly in the archaeological world, is one of the major developments of the years since the PPGs were published in the early 1990s<sup>8</sup>. On the whole, however, local authorities use in-house staff.

3.3 Other matters, including the impact of development on archaeology, wider regeneration, place-making and master-planning, the use of enforcement powers, work on heritage at risk, registered historic parks and gardens and World Heritage Sites, and advice on works to historic places of worship under the Ecclesiastical Exemption, are the result of central government policy as set out in PPGs 15, 16 and elsewhere (including such regulations as the Building Regulations 2000, Part L1B – Conservation of Fuel and Power). Local authorities are instructed to take account of this guidance and again need specialist advice to carry out these tasks.

3.4 The list of tasks is long and some of them may be quite rare in occurrence in some places. They are, however, not discretionary. While some parts of England, and some towns and cities, are rich in designated sites and buildings, everywhere in England has a distinctive history which can illuminate the future lives of those who live there and help in the regeneration of those places; in part this explains the diversity of local authority practice. It is central government policy that local

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regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The equivalent duty for conservation areas (section 66 (2)) is that 'in the exercise, with respect to any buildings or other land in a conservation area, of any (planning) functions ..., special attention shall be paid to the desirability of preserving and enhancing the character or appearance of that area'.

<sup>8</sup> PPG 16 was published in 1990 and PPG 15 in 1994.

authorities should have adequate advice to carry out this essential work and that is why the duties under the Acts are so framed and the guidance is drawn up as it is.

3.5 Local delivery is not a matter solely for local authorities, however. In order to outline as fully as possible the different kinds and levels of historic environment activity in each region, an indication of the staffing which English Heritage contributes to the historic environment at a local level is needed and this is given in section 6. No full correlation has been made between the key activities of a local authority historic environment service and English Heritage activities at this stage because much of the work of English Heritage varies across the country according to particular circumstance. However, English Heritage is given specific duties in advising local authorities where applications for consent concern buildings, sites or areas of national significance and these duties underline the importance of the duties which local authorities are given by the Planning Acts (as outlined in 3.2 above). Thus local authorities must consult English Heritage on various kinds of application for planning permission and listed building consent, requirements laid out in ODPM Circular 01/01.

3.6 The work of the Advice and Grants Teams in the Planning and Development Group of English Heritage, however, extends beyond development control and has important roles in terms of consultation on regional and local plans and of grants for the regeneration of historic areas and the repair of nationally important assets and wider in respect of conservation economics. It should be stressed that scheduled monument casework remains outside local authority control, the relationship being one between owners and the Secretary of State, with English Heritage advising the latter.<sup>9</sup>

3.7 Assessing whether the staff resources currently allotted within the sector to analyse, evaluate and protect the historic environment are adequate is therefore difficult because there is no agreement on how to measure adequate staff provision

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<sup>9</sup> The existence in English Heritage of Historic Environment Field Advisors, for instance, is due to the lack of any requirement for local authorities to carry out a monitoring role for scheduled ancient monuments, an important role which is carried out by local authority building conservation staff for listed buildings.

or on how that measurement would affect allocation of staff to tasks. To begin establishing a methodology for this assessment, the Steering Group drew up the list of tasks already mentioned (Appendix 1). All of these activities are important, whether statutory (i.e. backed up by statute) and mandatory; statutory and elective; the result of government policy; or as good practice. While the list is developing, and will form the focus of phase 2 of this research, they can be divided for convenience into the following categories:

- Data-related activity - general
- Data-related activity – SMR/HER
- Data-related activity – Designation
- Data-related activity – Heritage at Risk
- Research/Interpretation
- Policy
- Outreach- external
- Outreach – internal
- Historic Environment Management – General
- Historic Environment Management – Heritage at Risk
- Historic Environment Management – Heritage Partnership Agreements
- Historic Environment Management – Development Control
- Grants

3.8 Although the various types of activity at local authority level have been allotted frequencies in the chart at Appendix 1, it is difficult to weight each activity by numbers of related actions per week, month or year. Even more difficult is the matter of the hierarchy of activity. In part this is due to the nature of local government which, in being subject to local decision-making, is likely to vary from one authority to another. Although government policy, made explicit in the two PPGs, 15 and 16, as well as more strategic planning policy documents on the activities of local authority planning departments, acts as a counter-weight to excessive localism, the variation in engagement which one would expect between authorities is in part also exaggerated by the fact that, in the two tier model of local

authorities, archaeology tends to sit at the upper tier level and building conservation at the local<sup>10</sup>.

3.9 The problems are made worse by a lack of figures to allow full comparison of the workloads of historic environment services. The only figures per authority published by CLG are for planning permissions, listed building and conservation area consents<sup>11</sup>; detailed figures for other kinds of development impact on the historic environment are not retained nationally. Figures for planning permission, for instance, are neither kept for the numbers of planning permissions which affect conservation areas, nor for those paralleling listed building consents, nor indeed for those where development affects the settings of listed buildings and scheduled ancient monuments, nor for those with an archaeological input (the so-called PPG 16 cases). Nor are figures kept for planning permissions which affect registered historic parks and gardens and World Heritage Sites.<sup>12</sup>

3.10 Estimates of these wider numbers of permissions are difficult to make but the proportions could vary between 10% and 30% of all planning permissions. The lower percentage would give a figure in 2007/8 of 59,380 planning permissions nationally with a conservation share and an average of 163.5 permissions per authority; the upper would give a figure of 178,140 planning permissions, at an average of 490.7 applications per authority. As a comparison the Local Authority Conservation Provision Survey 2003 'found that on average local authorities were dealing with 1,891 applications each year, and that building conservation specialists advise on 17% of these'<sup>13</sup>. LACPS gives the average as 324 per authority, but does not qualify what

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<sup>10</sup> Miller, J., Andrews, G., Shaw, S., Bagwell, S., Newman, E. and Poulter, A., *Historic Environment Local Delivery Project*, Atkins Heritage for DCMS/EH, 2006 which gives a detailed overview of local authority historic environment practice.

<sup>11</sup> The Planning Inspectorate (PINS) publishes national figures for listed building consent appeals and inquiries.

<sup>12</sup> Use of the numbers of permissions as an indicator of activity can also be misleading in that it tends to underestimate the number of cases on which staff advise. There will always be slightly more applications than permissions, because applicants will sometimes withdraw applications during negotiations due to a change of mind or because it becomes apparent that the application would not be successful. Numbers of applications will also be refused, perhaps to go on to appeal.

<sup>13</sup> Grover, P., Viner D., Smith P. & Grover, H., *Local Authority Conservation Provision in England: research project into staffing, casework and resources*, Oxford Brookes University, for EH/IHBC, 2003. Note that LACPS 2003 talks of applications, rather than permissions, which would suggest a rather higher number.

an application means (it must include listed building consents and conservation area consents but also advice on planning applications because the figures are greater than the number of listed building consent and conservation area consent applications made in 2001/2, the year during which the figures seem to have been collected).

3.11 ALGAO last surveyed its membership in the financial year 2006/7 concerning the proportion of planning applications with archaeological implications. They found that 9.97% (16,379) were selected for appraisal (checking against the information held in the HER to see if they had archaeological implications) by local authority archaeological staff). Again, about a quarter of these (2.5% of the total number of planning applications) were found to have archaeological implications in the context of the planned development. Previous ALGAO surveys undertaken since the mid 1990s have shown that this figure is consistently between 2% and 3%.<sup>14</sup>

3.12 But development control casework is only a part of the workload of archaeological and building conservation staff in local authority historic environment services, and neither are comparative figures describing this wider and arguably more important work readily available. It would greatly assist an understanding of the outputs of local authorities if the amount of time which such services spend on outreach, on grants and related repair and maintenance issues, on regeneration and on place-making, on their input into policy matters within planning departments, on heritage at risk, on data gathering, on the development of Historic Environment Records, on archaeological investigation and interpretation, and on enforcement was more readily available, so that it could be set alongside the figures for development control activities. In particular, there is a lack of comparative figures for archaeological work in local authorities, both in development control casework, in the development of HERs, and in terms of more strategic work, including research, characterisation, interpretation, outreach and so forth. Similarly, although there is much data generated nationally and locally on deprivation and the need for

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<sup>14</sup> These figures are based on a circa 80% response rate from the ALGAO membership. A total of 16,379 applications were found to have archaeological implications, of which 15,149 were planning applications with 1,230 other applications. A total of 3,795 briefs for archaeological work were issued.

regeneration, there is little that can be used at a regional level. Work on overcoming the dearth of agreed figures will be part of the next stage of this project.

## **4 Local Authority staffing provision**

4.1 The local authority figures on which this report is based have been collected by ALGAO and IHBC. ALGAO has been keeping figures on local government archaeological staff resources on an annual basis since 1998; IHBC has produced figures in 2006 and 2008, although some broadly comparable figures, including figures for staffing, are available from the Local Authority Conservation Provision Survey of 2003. The ALGAO annual surveys can be fully tracked for data on trends in the archaeological staff resource but this is not strictly possible for the IHBC data because it is based on only two comparable surveys. The LACPS 2003 gives enough information, however, on the total numbers of established conservation posts and others routinely spending time on building conservation work for a reasonably accurate correlation to be made with the later figures and therefore for some conclusions to be drawn.<sup>15</sup>

4.2 The figures have been gathered for both permanent and temporary, full time equivalents<sup>16</sup>. The posts counted for both ALGAO and IHBC are those for which a related professional or academic qualification is required and for other staff, not fully qualified, who are engaged on equivalent work. Administrative staff are not included. Time spent directly managing staff is counted, as it has a direct consequence for the management of the historic environment. The management time of the head of a historic environment team is therefore included but that of the head of a group which includes the historic environment team is not.

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<sup>15</sup> This report considers the figures for building conservation staffing contained in the LACPS 2003 and the two IHBC surveys to be broadly equivalent, in that there is a little doubt as to whether the 2003 figures were collected in exactly the same way as the 2006 and 2008 figures. For instance, the definition of conservation staffing in the latter surveys is as described in paragraph 4.2. The definition for LACPS is given on page 1 of Appendix B of that report: ‘For the purposes of this survey the definition of ‘conservation specialist’ is somebody whose primary responsibility is to provide expertise with regard to listed buildings, conservation areas and the historic environment as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and PPG 15.’ It did, however, seek to quantify all specialist staff working in conservation.

<sup>16</sup> Please note that numbers have been summarised; percentages may not always add up to one hundred.

	LA Staff working on Conservation			LA Staff working on Archaeology			All LA historic environment staff		
	2003	2006	2008	2003	2006	2008	2003	2006	2008
East	81.00	95.72	95.07	46.70	66.00	63.40	127.70	161.72	158.47
East Midlands	74.00	89.05	81.85	44.50	47.10	48.00	118.50	136.15	129.85
London	67.00	132.20	114.50	10.00	15.00	12.00	77.00	147.20	126.50
North East	22.00	32.50	33.15	19.50	15.50	18.20	41.50	48.00	51.35
North West	82.00	72.60	67.21	24.00	31.00	34.00	106.00	103.60	101.21
South East	133.00	129.20	122.53	60.25	62.20	58.10	193.25	191.40	180.63
South West	97.00	135.65	121.50	69.15	79.00	84.64	166.15	214.65	206.14
West Midlands	68.00	79.60	71.77	43.25	50.10	49.30	111.25	129.70	121.07
Yorkshire & Humber	44.00	50.45	48.76	29.00	41.25	33.50	73.00	91.70	82.26
National	668.00	816.97	756.34	346.35	407.15	401.14	1014.35	1224.12	1157.48

**Table 2 – Numbers of FTEs working in Local Authority Historic Environment services in 2003, 2006 and 2008**

4.3 Table 2 shows the headline figures (FTE) for the trend of employment in specialist historic environment service staffing nationally. The years chosen (2003, 2006 and 2008) reflect the available data for building conservation provision. The 2003 conservation data should be treated as broadly equivalent rather than as a true and accurate measure (see note 15 above). The ALGAO data is comparable over the three surveys.

4.4 Examination of the totals for building conservation shows that the figure grew from 668FTE in 2003 to 816.97FTE in 2006 and then has reduced to 756.34FTE in 2008, an overall increase of 88.34 over the five year period, but a reduction of 60.63 over the past two years. The similar figure for archaeology shows that the numbers grew from 346.35FTE in 2003 to 407.15FTE in 2006 and this has reduced to 401.14FTE in 2008, an overall increase of 54.74. When these figures are combined it shows an overall increase over the five years 2003 to 2008 of 143.13FTE.

4.5 These figures can be used to give a national average staff resource per authority. Using the data in Table 1 to give an overall population of authorities of 397, the overall average provision comes to 2.56FTE in 2003, rising to 3.08FTE in 2006 and then falling back slightly to 2.92FTE in 2008. For building conservation, the averages rise from 1.68FTE to 2.06FTE, before falling back to 1.91. For archaeology

(averaged across all local authorities although in practice the lower tier authorities in areas with two tiers of local government usually rely on an upper tier archaeological service) the average rises from 0.87FTE to 1.03FTE before falling back slightly to 1.01FTE.

	LA Staff working on Conservation			LA Staff working on Archaeology			All LA historic environment staff		
	2003	2006	2008	2003	2006	2008	2003	2006	2008
East	1.50	1.74	1.73	0.86	1.20	1.15	2.36	2.41	2.29
East Midlands	1.61	1.94	1.78	0.97	1.02	1.04	2.58	2.67	2.42
London	2.03	4.01	3.47	0.30	0.45	0.36	2.33	1.83	1.59
North East	0.85	1.25	1.28	0.75	0.60	0.70	1.60	2.19	2.42
North West	1.74	1.54	1.43	0.51	0.66	0.72	2.26	2.65	2.67
South East	1.77	1.72	1.63	0.80	0.83	0.77	2.58	2.82	2.63
South West	1.83	2.56	2.29	1.30	1.49	1.60	3.13	4.38	4.23
West Midlands	1.79	2.09	1.89	1.14	1.32	1.30	2.93	3.81	3.62
Yorkshire & Humber	1.83	2.10	2.03	1.21	1.72	1.40	3.04	5.78	5.01
National	1.68	2.06	1.91	0.87	1.03	1.01	2.56	3.08	2.92

**Table 3 Average numbers of FTEs per authority in each region.**

4.6 When this data is broken down by region, as in Table 3, it shows that there are significant regional variations in most of the categories. The region showing the most significant divergence is London which has the highest regional average for conservation provision (3.47FTE against a national average of 1.91FTE in 2008) and the lowest regional average for archaeology (0.36FTE against a national average of 1.01FTE in 2008).

	LA Staff working on Conservation			LA Staff working on Archaeology			All LA historic environment staff		
	2003	2006	2008	2003	2006	2008	2003	2006	2008
East	12.13%	11.72%	12.57%	13.48%	17.81%	15.80%	12.59%	13.21%	13.69%
East Midlands	11.08%	10.90%	10.82%	12.85%	12.08%	11.97%	11.68%	11.12%	11.22%
London	10.03%	16.18%	15.14%	2.89%	4.11%	2.99%	7.59%	12.02%	10.93%
North East	3.29%	3.98%	4.38%	5.63%	4.25%	4.54%	4.09%	3.92%	4.44%
North West	12.28%	8.89%	8.89%	6.93%	7.94%	8.48%	10.45%	8.46%	8.74%
South East	19.91%	15.81%	16.20%	17.40%	13.48%	14.48%	19.05%	15.64%	15.61%
South West	14.52%	16.60%	16.06%	19.97%	21.64%	21.10%	16.38%	17.54%	17.81%
West Midlands	10.18%	9.74%	9.49%	12.49%	8.36%	12.29%	10.97%	10.60%	10.46%
Yorkshire & Humber	6.59%	6.18%	6.45%	8.37%	10.34%	8.35%	7.20%	7.49%	7.11%
National									

**Table 4 Percentage of the national resource broken down by region.**

4.7 Table 4 takes the data from Table 2 and expresses it as a percentage of the overall national resource for the three years being studied. This indicates that, in terms of the percentage of the national resource, many of the regions are remaining stable relative one to another. However a few regions diverge from this; London region shows a significant increase in the overall percentage, almost wholly derived from the increase in building conservation provision. On the other hand the South East shows a significant decrease, which is reflected roughly equally in the building conservation and archaeology figures.

### **Archaeology**

4.8 Table 2 gives the regional breakdown of the national staff resource for archaeology in local authorities (i.e., in the case of archaeology, largely in county and unitary authorities). The headline figures show an increase in the numbers of archaeologists employed in local government in the years between 2003 and 2006 of 60.80FTE and then a slight decrease of 6.01FTE.

	Total %			Planning %		HER%		Characterisation; Education and Outreach %	
	2003	2006	2008	2006	2008	2006	2008	2006	2008
East	13.48%	16.21%	15.80%	11.53%	16.43%	24.59%	13.52%	23.42%	17.48%
East Midlands	12.85%	11.57%	11.97%	12.79%	11.39%	9.00%	10.84%	14.39%	14.12%
London	2.89%	3.68%	2.99%	7.12%	4.19%	1.96%	3.16%	0.00%	1.00%
North East	5.63%	3.81%	4.54%	4.93%	5.32%	3.91%	3.56%	3.11%	4.50%
North West	6.93%	7.61%	8.48%	7.12%	7.35%	6.36%	8.66%	11.84%	9.95%
South East	17.40%	15.28%	14.48%	13.26%	16.16%	13.69%	17.16%	13.71%	8.90%
South West	19.97%	19.40%	21.10%	27.19%	17.77%	20.70%	20.12%	10.23%	27.20%
West Midlands	12.49%	12.31%	12.29%	5.73%	11.97%	8.36%	13.92%	14.33%	10.90%
Yorkshire + Humber	8.37%	10.13%	8.35%	10.33%	9.42%	11.44%	9.06%	8.97%	5.95%

**Table 5 Breakdown of archaeological provision by region expressed as a percentage of the annual population**

4.9 Table 5 breaks the archaeological data down into three categories of activity for the 2006 and 2008 data: Planning; HERs; and Characterisation, Education and Outreach. Examination of this table shows that within a broadly unchanged overall population of just over 400FTEs there have been movements of resource between the three categories. Examined at a national level, as in table 6, this shows that a

reduction is revealed in staff working in planning which has been balanced out by an increase in the other two categories, especially in the Characterisation, Education and Outreach activity category.

	2006	2008
Planning	50.00%	41.03%
HERs	28.02%	31.52%
Characterisation; Education and Outreach	21.99%	27.45%
	407.15FTE	401.14FTE

**Table 6 Overall activities expressed as a percentage of the whole of the annual archaeological populations**

The increased involvement with HERs relates in part to forthcoming legislative changes, making HERs statutory, but also to increasing access to the Heritage Gateway, to environmental stewardship and to an increase in outreach. That said, a definitive answer to the decline in archaeologists engaging with the planning system is needed. It would be particularly worrying if the reduced number of posts was hit by further reductions in the current economic downturn.

### **Building Conservation**

4.10 Conservation, however, shows a rather different trajectory. The headline figure for FTEs in local authority employ is almost twice the number of that for archaeologists but this can be explained in part by the nature of the designation and development control processes and what can often be a wider remit for building conservation, as well as by the larger numbers of statutory duties on planning authorities contained in the planning acts.

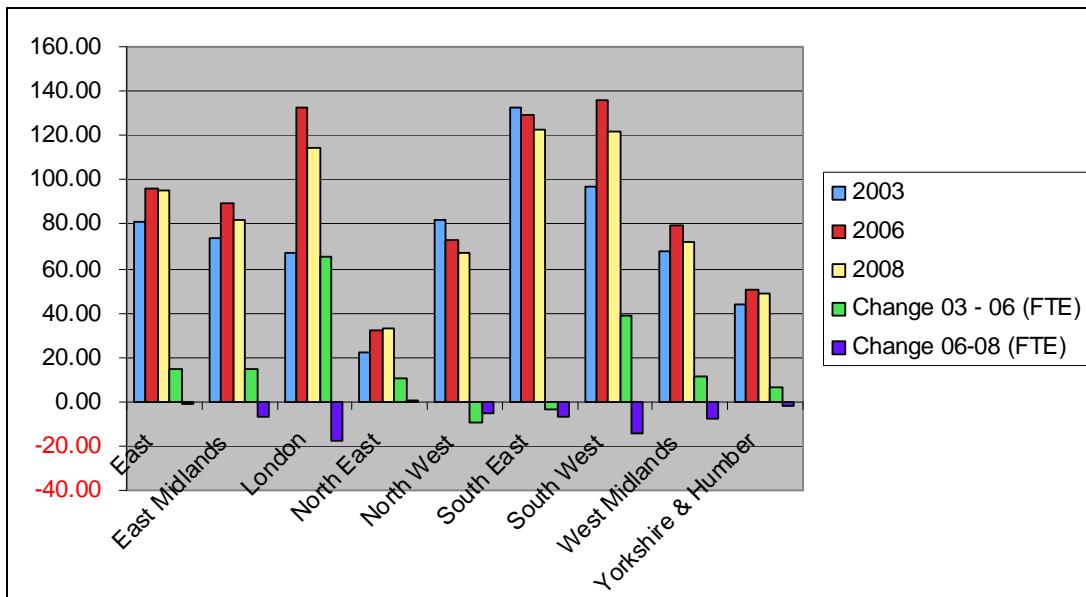
4.11 As explained at 3.1 above, any consideration of change in employment of building conservation staff at local authorities has to take into account the fact that annual surveys, carried out on the same basis, are lacking; although the 2006 and 2008 surveys are on the same basis, it is not clear that the LACPS of 2003 was on exactly the same basis and the 2003 figures should therefore be considered as

roughly equivalent (seen paragraph 4.1 and note 15). The final column in the first table on page 20 of the LACPS report has the numbers of staff broken down by region.

Numbers of Building conservation staff in 2003	
East	81
East Midlands	74
London	67
North East	22
North West	82
South East	133
South West	97
West Midlands	68
Yorkshire and Humber	44
Total	668

**Table 7 – Totals of staff by region taken from LACPS survey 2003**

4.12 Although the numbers of FTEs working in building conservation (i.e. conservation specialists and other staff carrying out the work of conservation specialists) from 2003 to 2006 may have generally been up (from 668 to 816.97FTE), we can be sure that the numbers of FTEs declined between 2006 to 2008 (from 816.97 to 756.34FTE; figures taken from Table 2 above). These national figures hide regional changes between 2003, 2006 and 2008, with only the North East showing an increase for all three years surveyed; the converse is true in the North West and the South East with three consecutive reductions of FTEs recorded. The other regions show increases between 2003 and 2006 and then reductions between 2006 and 2008.

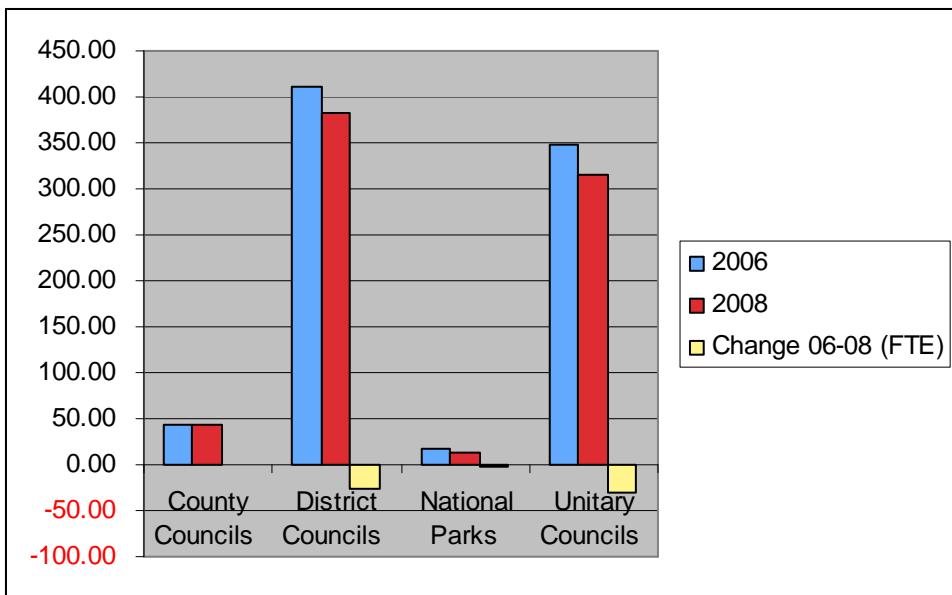


**Table 8 – Regional breakdown of built conservation FTEs for 2003, 2006 and 2008**

4.13 In terms of building conservation provision over the different types of authorities there is no breakdown for 2003, but all types have lost staff over that latter two year period, with counties least hit, at less than a 1% loss (but from a low base), both districts and unitaries outside London declining by between 6% and 9%, National Parks interestingly by 14% (but again from a very low base, actually 2.3 FTE) and in London authorities by nearly 12%.

	Trained Conservation staff				Staff working on conservation			
	2006	2008	Change 06-08 (FTE)	Change 06-08 (%)	2006	2008	Change 06-08 (FTE)	Change 06-08 %
County Councils	43.10	42.70	-0.40	-0.93	43.10	42.70	-0.40	-0.93
District Councils	388.42	367.38	-21.04	-5.42	409.92	383.43	-26.49	-6.46
National Parks	16.20	14.10	-2.10	-12.96	16.40	14.10	-2.30	-14.02
Unitary Councils	323.55	304.11	-19.44	-6.01	347.55	316.11	-31.44	-9.05
Total	771.27	728.29	-42.98	-5.57	816.97	756.34	-60.63	-7.42

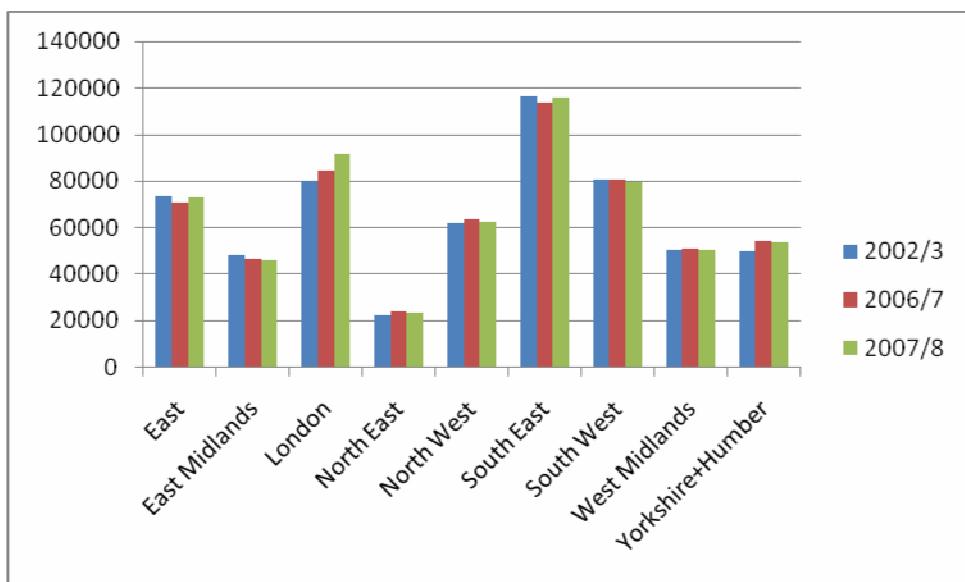
**Table 9 – Totals of FTEs broken down by region showing the change between 2006 and 2008**



**Table 10 – Chart showing the numbers of FTEs by authority type in 2006 and 2008 and the change between the two survey dates.**

#### **Measurement of the activity levels of staff involved in planning-related historic environment management**

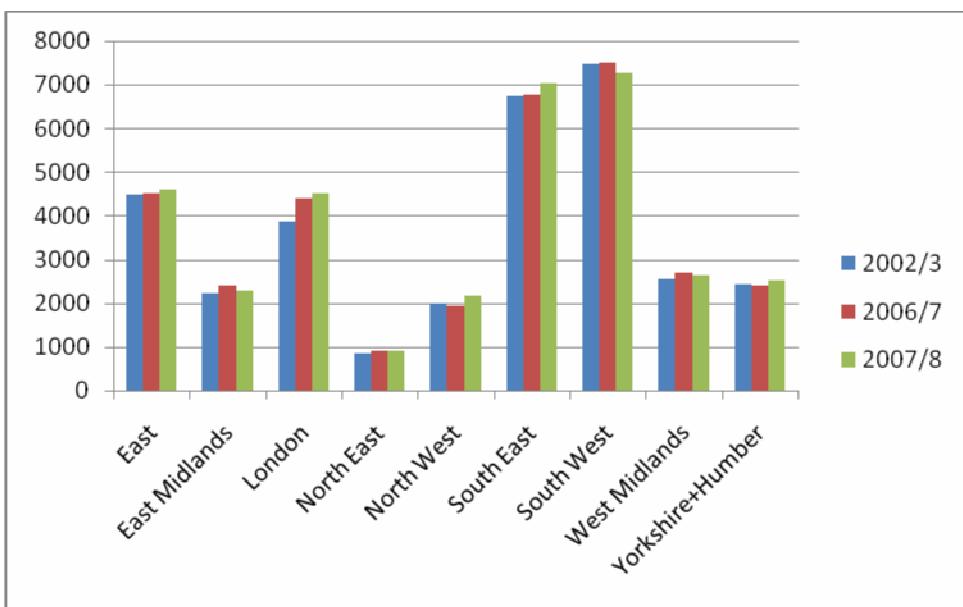
4.14 With the exception of data collected by CLG on listed building consent and conservation area consents there is no comprehensive and audited measurement of activity by local authority staff in respect of management of the historic environment. We therefore have to use the available data on LBC and CAC as proxy indicators to be set against the overall levels of activity, as indicated by the numbers of completed planning consents. It is recognised that local authority archaeological services do not have nationally collected and reviewed figures for their activities; most of this occurs within the planning system and doesn't involve nationally designated archaeology. As indicated in paragraph 3.11, however, ALGAO collected some data for the year 2006/7 which indicated that 16,379 planning applications were found to have implications for the archaeological resource and that 3,795 briefs for archaeological work were produced.



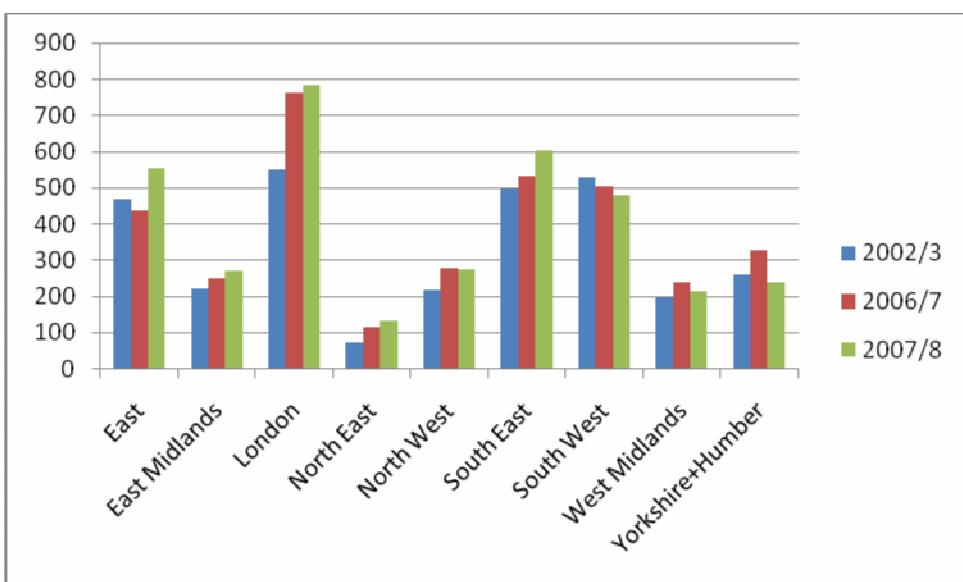
**Table II numbers of planning consents**

4.15 The overall number of planning applications nationally rose by 11,658 between 2002/3 and 2007/8, a 2% growth over the five years. Table II above has the regional breakdown and it shows that London region was the only region to show significant year on year increase in numbers with an increase of 11,283 between 2002/3 and 2007/8. The East Midlands region shows the converse with a year on year reduction, giving an overall reduction in numbers of 2,088. The overall number of applications in the other regions remains approximately constant between 2002/3 and 2007/8.<sup>17</sup>

<sup>17</sup> An indication of the recent significant reduction in planning-related activity due to the economic downturn can be seen in the sharp fall in applications determined by local authorities. Figures published by CLG in March 2009 show that there was a 22% fall in the number of planning applications determined between October and December 2008 compared to the same period in 2007. However, Listed Building Consents and Conservation Area Consent decisions fell by only 9 and 10% respectively over the same period.



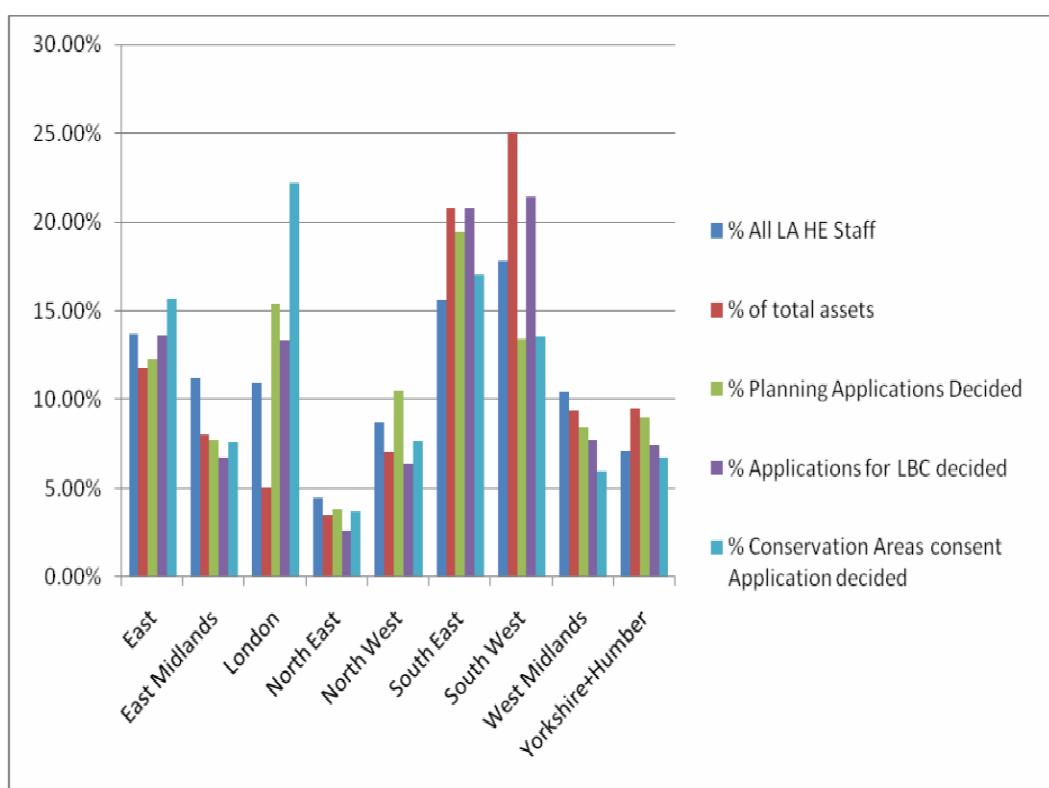
**Table 12 number of listed building consents**



**Table 13 number of Conservation Area consents**

4.16 The Historic Environment specific consents in the years surveyed increased at a higher rate than planning consents. Listed building consents grew by 4.11% and conservation area consents grew by 17.71%, albeit from a low base. Compared to planning applications more regions show growth over the three years surveyed and for strictly listed building and conservation area consents only the South West showed an overall decline of 222 listed building consents and 49 conservation area consents.

4.17 Using data from the latest available whole year (2007/8), it is possible to generate average numbers of consents by authority within each region. The national annual average for Listed Building Consents is 85.5 per individual authority with a regional range from 137 per authority in London region to 34.5 per authority in the North East region, 185% and 40% of the national averages. In 2007/8 the national average for planning consents to individual listed building consents is 17.5:1; with the South West having the highest ratio of approximately 11:1 and the North West the lowest of 29:1. These figures should be treated with caution, however, as the variation between authorities within regions can be great.



**Table 14 Regional breakdowns showing the staff resource, totals of designated assets and activities as a percentage of the respective national totals**

4.18 Table 14 shows that for the majority of regions the activity in the historic environment, as measured by consents, is roughly in accord with the regional percentage of the total assets. However London region and the South West stand out from the other regions, with London having 5% of the designated assets but about 14% of the consents whilst the South West has 25% of the total designated assets but about 17% of the consents. Presumably this reflects the development

pressures on the historic environment in London region whilst in the South West those pressures manifest themselves differently.

4.19 As already mentioned, this understates the level of essential work which local authority historic environment services must carry out, both in support of the planning and historic environment duties in the acts but also in terms of the requirements of government policy on the historic environment. Annex I gives a provisional overview just of those work streams which are mentioned in legislation or government policy guidance. Equally important is the lack of a suitable framework for considering the impact of decline and the need for regeneration on the historic environment. For instance, while London and the South East can be seen to have high development pressures, judged from the numbers of planning permissions granted, it is difficult, at least at a regional level, to judge their regeneration needs (and they do exist). Deprivation statistics generally only make sense at local authority, or even lower, level. At a regional level, gross disposable household income for London, for instance, hides important pockets of deprivation. The overall lack of comparative figures needs to be addressed and English Heritage will be discussing data collection with CLG, which is responsible for data collection in the planning system.

#### **Reasons for the changes in employment levels**

4.20 A reason for the changes in archaeological provision in local authorities has already been mentioned in paragraph 4.9 (the development of HERs), but the main comment on provision has centred on the decline in the provision of specialist building conservation staff in local authorities. As the figures show, the story over a period of a number of years is rather more complicated than a straight decline, but it is important to seek reasons for the recent loss of posts. The totality of lost posts is made up of a large number of individual losses, and even part losses, and these will always represent losses in local knowledge and skills. However, as one would expect, they often have particular reasons behind them, and idiosyncratic impacts once the reduction is made. For instance, one of the reasons given for the loss of posts in Table 15 below is due to loss through a post becoming part time as the post-holder approaches retirement, to be replaced part time when the post-holder retires.

Further reasons for lost posts may be neutral in impact, particularly the freezing of posts pending unitary re-organisation (but that becomes a substantive reduction if the post is not unfrozen later). Other suggested reasons include:

- a possible decrease in the numbers of temporary posts following the closure of time-limited area grant schemes;
- the withdrawal of Planning Delivery Grant, which was useful for local authorities particularly in discharging the Best Value Performance Indicator on the drawing up of conservation area management plans;
- local authority reorganisation; and
- the decline in overall grant-in-aid for local authorities.

Whichever the reason, the decline represents a loss in provision for the protection of the historic environment and is most likely to affect pro-active work which is not a statutory requirement.

	<b>Category of loss of post</b>	<b>Comment</b>
1	Temporary loss of post on expiry of contract	Loss of Planning Delivery Grant; loss of project post at end of conservation-led regeneration scheme or conservation area assessment
2	Post frozen or more general recruitment freeze	Management of staffing within authority
3	Post removed from establishment, following recruitment freeze	
4	Post-holder made redundant	The most recent local government structural reforms, creating more unitary authorities, implemented in April 09), may lead to redundancies in future surveys (See note 13 below)
5	Post-holder retired and not replaced	
6	Post-holder reduced hours which were not backfilled	This is relatively common where staff approach retirement; replacement post may be filled on the reduced hours
7	Failure to fill post	Where the post has been advertised and not filled
8	Redeployment or promotion of postholder	Redeployment whether voluntary or involuntary. This can include promotion to a post which manages building conservation (such as management of the team within which conservation sits, such as the Conservation & Design or Policy section) or redeployment to another post or local authority section not always dealing with conservation.
9	Cessation of use of consultant	Where consultant is backfilling a post
10	Reduction in use of consultant	Where reduction is less like 9 and more like 6
11	Cessation or reduction in use of service level agreement with another authority	

12	Inaccurate assessment of time in service level agreement	Effectively the underestimation by one party or other of staff time within an SLA; the Figures show this is more common than might be thought, and that it is the authority in receipt of the service in an agreement which is more likely to underestimate the time
13	Post frozen in anticipation of unitary re-organisation	
14	Loss of fixed-term part-externally funded post (e.g. Building at Risk or Townscape Heritage Initiative posts)	

**Table 15 Categories of loss of posts in LPAs (Building Conservation)**

## 5 Age Profiles in Building Conservation

5.1 A widespread concern in the building conservation sector, moreover, is that the age profile of building conservation staff in local authorities is rising, leading to what has been called a retirement time bomb. The Select Committee commented on this matter directly, being very concerned about the age profile of the local government conservation officer profession, suggesting that this was caused by a combination of an ageing profession and a lack of concern about the recruitment of younger members<sup>18</sup>.

5.2 The first table in each pair below gives cumulative age distributions for local authority building conservation professionals, archaeologists, planners and all professionals; the second table in each pair gives the percentage of professionals in each age band. The first pair uses figures for all archaeologists, with the second table substituting local authority archaeologists for all archaeologists (unfortunately the age figures for all employed in building conservation – not just local government conservation - are not available, so it is not possible to run a comparison).

5.3 The difficulty with this kind of comparison is that of comparing complete censuses with sample surveys where there is a range around the estimated proportions. In these tables, for instance, the comparison with planners is problematic because of the small sample of planners in the Quarterly Labour Force Survey data<sup>19</sup>. The main divergence comes by comparison with all archaeologists, where there is a younger profile but that is presumably due to the tendency for archaeologists to move away from field archaeology in mid career. In the case of building conservation staff in local authorities, there is a trend towards slightly lower numbers at younger ages but that may be accounted for by the past tendency for

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<sup>18</sup> See note 6.

<sup>19</sup> Sources of the figures in the tables:

Planners (SOC group 2432) and All professionals (SOC group 2): Quarterly Labour Force Survey April 2007 to March 2008

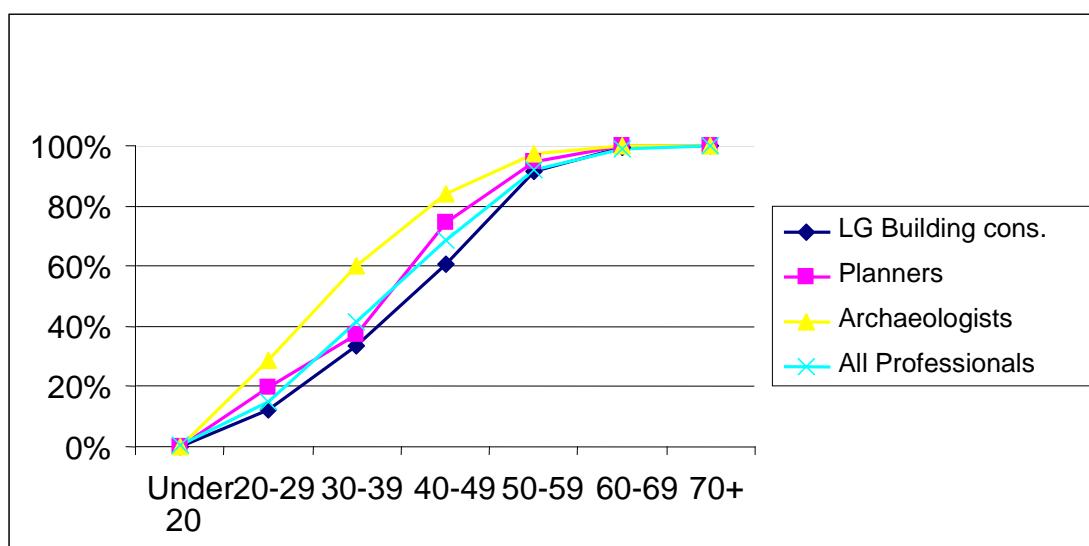
Archaeologists: Profiling the Profession 2007-2008

Conservation: Quantifying Local Authority Conservation Staffing 2008

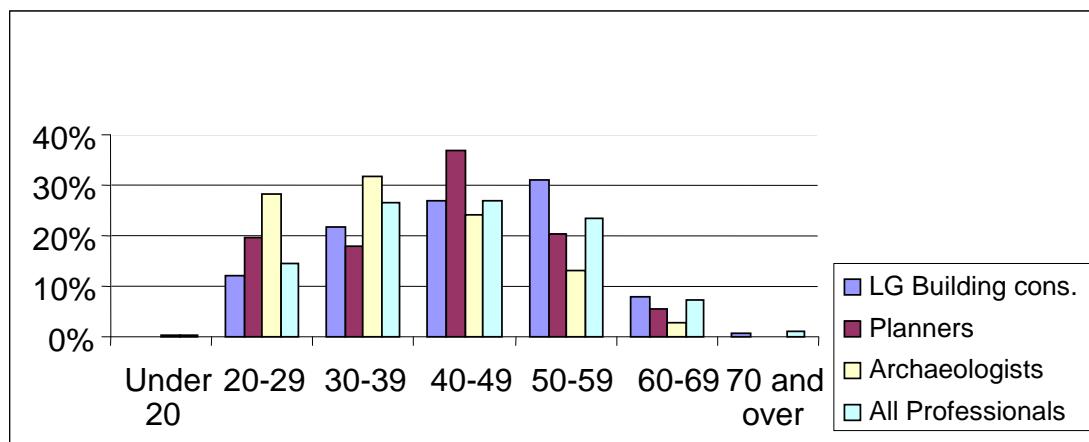
conservation staff to come into the profession slightly later than archaeologists who are recruited direct from university.

5.4 Unlike the other professions, the peak is therefore between the ages of 50-59, rather than 40-49, but this does not suggest that there is necessarily a crisis in recruitment. Again, to assess whether there is, or is not, a problem of future supply of local authority building conservation staff that is significantly different from other professions, a time series of age profiles of conservation staff and other professionals is needed. It would be worrying if the age profile of staff was getting older more quickly than other professions, but to conclude from these figures that there necessarily is an imminent crisis in supply of conservation staff would be wrong.

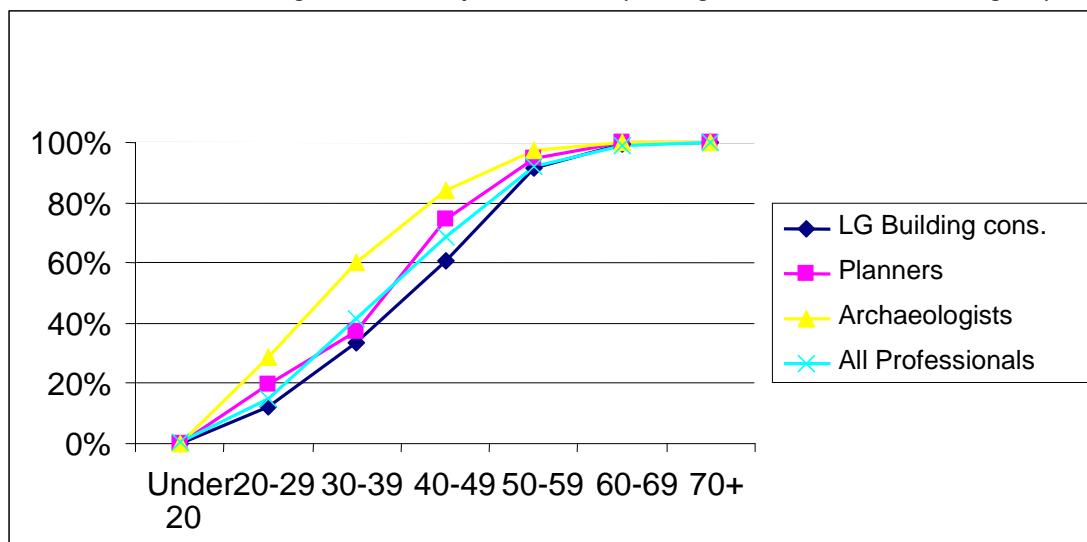
**Table 16 Cumulative age bands for professions (all archaeologists)**



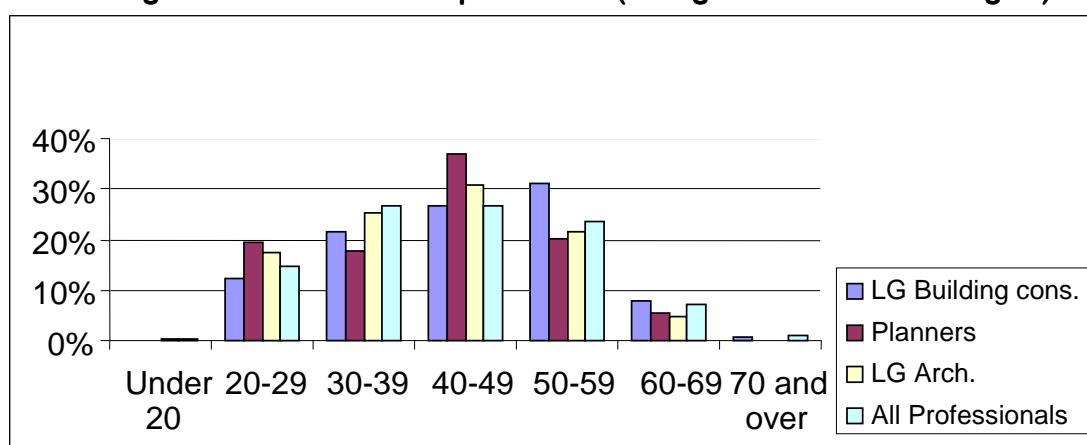
**Table 17 Age band distribution for professions (all archaeologists)**



**Table 18 Cumulative age bands for professions (local government archaeologists)**



**Table 19 Age band distribution for professions (local government archaeologists)**



## **6 Data on English Heritage support services for the planning system**

6.1 Local authority activity in terms of the historic environment is at the heart of its protection. As explained in the Introduction, English Heritage also engages locally, but only a part of English Heritage's work has been included for consideration in this report. This is due to the lack of equivalence between much of the work of English Heritage and local authorities; only the regional Advice and Grants Teams in Planning and Development Group give a comprehensive service in terms of the nationally-important casework on which it is consulted (in most other cases, selection is necessary by prioritisation). Other parts of English Heritage engage with regional work in part and full analysis will be undertaken in the next phase of research. Although not comprehensive, the work of many teams in English Heritage adds value to the core work carried out by local authorities.

6.2 The figures given below, therefore, cover only the Advice and Grants Teams in the Regional Offices of English Heritage's Planning and Development Group, largely dealing with advice on development control applications and grants to historic sites and buildings. In common with the ALGAO and IHBC surveys, administrative support roles are omitted but management roles are included. The following posts have been included in the English Heritage figures:

- Ancient Monuments' Inspectors: advice on archaeology
- Historic Environment Field Advisors: condition surveys on scheduled monuments.
- Historic Buildings' Inspectors: advice on historic buildings
- Historic Areas' Advisors: advice on historic areas
- Regional Land-use Planners: advice on the impact of development plans and other planning policy documents on the historic environment
- Regional Landscape Architects: advice on historic parks and gardens
- Historic Building Architects/Surveyors: advice on the conservation and repair of historic buildings and sites
- Regional Policy Officers: regional historic environment policy work
- Regional Directors: managing the regional team

6.3 The following table analyses EH staff who engage with planning delivery (FTE) by region.

**Table 20 Breakdown by region of EH staff (FTE) who engage with planning delivery**

Region	Archaeology	Building Conservation	Planning & Policy	Architects/Surveyors and Landscape	Regional Director	
North East	2.79	3	2.33	1.83	1	10.95
North West	2.4	5	2.33	2.33	1	13.06
Yorks & Humbs	4.1	3.56	2.66	2.83	1	13.15
East Midlands	3.4	5.8	2.5	2.7	1	15.40
East of England	3.5	4.8	2.5	4.5	1	16.30
West Midlands	4.25	4	2.5	2.5	1	14.25
South West	12	7.5	3.5	4.1	1	28.1
South East	6.3	5.5	2.5	4	1	19.3
London	2 <sup>20</sup>	15	4	5	2	28
GHEU	0	2	0	4	0	6

6.4 English Heritage must be consulted by local planning authorities under the terms of ODPM Circular 01/01 on various types of nationally important casework, such as casework involving Grade I and Grade II\* listed buildings, involving scheduled monuments and larger-scale development in conservation areas, largely due to the national significance of the asset. It is also well-positioned to comment in detail on development plans and on regional policy documents. Through its national casework role, the regional Advice and Grants Teams are able to draw in the wider expertise of English Heritage in support of local authority work, in particular specialist conservation advice (architectural/surveying, structural engineering or mechanical engineering advice, for instance); specialist research assistance (e.g. archaeological, historical and architectural research or materials analysis); policy advice; advice and assistance on conservation economics (both in terms of EH grant schemes and wider financial analysis, as with enabling development); and Heritage at Risk work. It is therefore appropriate to add English Heritage staffing to the regional totals with the

<sup>20</sup> Excludes SMR officers and planning archaeologists who are part of the Greater London Archaeological Advisory Service, which provides a service strictly analogous to local authority archaeological services, and is therefore included within the ALGAO data.

results shown in the table below. The following chart also gives numbers of permissions for consent by region.

**Table 21 Combined local authority and English Heritage staff totals for 2008**

	2008					2007/8			
	Cons staff/ region	Arch staff/ region	All LA HE Staff/ region	EH HE staff/ region	LA and EH HE staff /region	Plan applns decided /region	LBC applns decided /region	CAC applns decided /region	SMC applns decided /region
East	95.07	63.40	158.47	16.30	174.77	73000	4613	553	136
East Midlands	81.85	48.00	129.85	15.40	142.25	45700	2280	268	63
London	114.50	12.00	126.5	28.00	154.50	91300	4524	784	108
North East	33.15	18.20	51.35	10.95	62.30	22900	896	130	78
North West	67.21	34.00	101.21	13.06	114.27	62400	2158	272	59
South East	122.53	58.10	180.63	19.30	199.93	115500	7047	601	188
South West	121.50	84.64	206.14	28.10	234.24	79500	7259	480	145
West Midlands	71.77	49.30	121.07	14.25	135.32	50000	2630	211	102
Yorkshire + Humber	48.76	33.50	82.26	13.15	95.41	53500	2520	237	89
Total	756.34	401.14	1157.48	158.51	1198.72	593800	33927	3536	968

## 7 The Impact of the Economic Downturn

7.1 The 2008 statistics on which this report is in part based were completed in the last months of 2008. No new figures have yet been completed. It is clear, however, that the current economic downturn is having an impact on the development industry and that this is in turn impacting on planning authorities, in the loss of planning fee income and therefore on their staffing. A reduction in capacity would certainly be counter-productive, particularly as these skills will be needed in the future and will have to be re-created where they have been lost. Indeed the Killian Pretty Review underlines the importance of retaining staff:

*We would strongly encourage local authorities to think carefully before making any dramatic reduction in the number of planning staff in reaction to this (the economic downturn). The results of drastic contractions in local authority planning departments during past economic downturns are still having an impact upon the staffing and skills base of the planning system many years later.<sup>21</sup>*

The importance of retaining scarce skills is underlined in other such reports, including *The Credit Crunch and Regeneration: Impact and Implications*, and CLG has called on local authorities not to lose planning skills during the recession<sup>22</sup>. As important components of the planning system, it is crucial that the same approach is taken to archaeological and building conservation staffing and this report recommends that CLG and DCMS should issue a similar call on local planning authorities not to lose scarce skills and specialist staff during the downturn.

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<sup>21</sup> *Planning Applications: A Faster and More Responsive System*, Final Report, 2008.

<sup>22</sup> M Parkinson, M Ball, N Blake, T Key, *The Credit Crunch and Regeneration: Impact and Implications, An Independent Report to the Department for Communities and Local Government*, 2009.

## **8      Heritage Protection Reform and Local Authority staffing**

8.1     The impact of the Heritage Protection Reforms foreshadowed by the Heritage Protection Bill has been mentioned above. Although major changes to the heritage protection system would be introduced by the Heritage Protection Bill, the additional burden on local authority staffing would not be great, and the Department for Culture, Media and Sport has undertaken fully to fund the two most important extra burdens on local authorities, the devolution of scheduled monument consent casework and the greater emphasis on Historic Environment Records. However, the higher profile which collaborative working takes under the Heritage Protection Reforms would only emphasise the constraints on building conservation provision, in particular, but also the decline in archaeological input into the planning process, within planning departments. The Heritage White Paper 2007 underlined the need for the consideration of the historic environment to be at the heart of an effective planning system and any decline in capacity will affect how this will be achieved.

## **9 Recommendations**

9.1 The LACPS 2003 reported how workloads unbalanced the work of conservation staff: ‘The overwhelming impression from the survey is one of a stretched service strongly biased towards reactive day-to-day casework at the expense of vital pro-active work’. The current surveys do not allow any certainty as to whether there has been a move away from casework (that will be a matter for phase 2 of this project) but it would be surprising if it had. At the same time, archaeological provision appears to be moving away from casework towards more strategic work, widening the gap between the two cultures of archaeology and building conservation. Work will be needed to ensure that archaeology and conservation specialists can work together well in unified historic environment services, so essential if the full benefit of heritage protection reform is to be enjoyed.

9.2 The compilation of this report shows very clearly the need for audited figures, national, regional and for each local authority, which would allow a broader view of local authority engagement with the historic environment. Bald figures, as at present, giving numbers of listed building and conservation area consents alone are clearly insufficient. As this report outlines, local authorities engage much more widely, even in terms of casework alone. Ideally, reviewed figures collected by CLG would offer greater clarity concerning the level of development control work which has a historic environment dimension. We will therefore discuss with CLG the possibility of collecting development control figures on a wider range of planning permission categories.

9.3 More detail is also needed on local authority duties, powers and responsibilities under the planning acts and related legislation. This will form the major part, with further analysis of English Heritage engagement with the local historic environment service, of a second report, to be published in Summer 2009. English Heritage, ALGAO and IHBC will continue their joint work in this area. Finally, all three partners believe the current survey should be repeated on a regular basis, annually at the outset, to capture the changing landscape of local authority historic environment staffing. The partners will discuss the parameters of the

continuing surveys, particularly in the light of the need for a broader view of local authority historic environment work.

9.4 This report therefore makes the following recommendations:

1. Further work on local authority duties, powers and responsibilities under the planning acts and related legislation and policy guidance, to be published as a second stage of this report. The aim would be to provide a number of possible models for the effective delivery of historic environment services in local authorities.
2. The carrying forward of the ALGAO and IHBC surveys on a regular basis, annually at first, to better understand the changing landscape of local authority historic environment staffing.
3. The historic environment sector should press the Department for Communities and Local Government and the Department for Culture, Media and Sport to issue a statement reaffirming that historic environment services are integral to planning departments and discouraging cuts in historic environment staffing during the current economic downturn.
4. The collection by CLG of development control figures on a wider range of planning permission categories so that historic environment workloads can be better understood.

## Bibliography

- Association of Local Government Archaeological Officers, *Local Authority Archaeological Services: Report on Staffing and Casework Surveys 1997-2008*.
- Grover, P., Viner D., Smith P. & Grover, H., *Local Authority Conservation Provision in England: research project into staffing, casework and resources*, Oxford Brookes University, for EH/IHBC, 2003
- Heritage Counts*, 2003/2006/2008
- Institute of Historic Building Conservation, *Quantifying Local Authority Conservation Staffing, 2006 and 2008*.
- Institute of Historic Building Conservation, *How to care for Places and People: Towards a Common Standard in Historic Environment Conservation Services and Skills*, 2008
- Miller, J., Andrews, G., Shaw, S., Bagwell, S., Newman, E. and Poulter, A., *Historic Environment Local Delivery Project*, Atkins Heritage for DCMS/EH, 2006.
- Planning Applications: A Faster and More Responsive System; Final Report*, (the Killian Pretty Review), 2008.

## Abbreviations used in this report

ALGAO	Association of Local Government Archaeological Officers
CAC	Conservation area consent
DCLG	Department for Communities and Local Government
DCLG	Department for Communities and Local Government
EH	English Heritage
HPR	Heritage Protection Reform
IHBC	Institute of Historic Building Conservation
LACPS	<i>Local Authority Conservation Provision in England: research project into staffing, casework and resources</i> , 2003
LBC	Listed building consent
PPG	Planning Policy Guidance Note
SMC	Scheduled monument consent

## Appendix I

### Key activities of the Historic Environment Service, arising from legislation and government policy guidance

Historic Environment Activity	Statutory Duty	Proactive/ Reactive	Frequency	Varied because of HPR	Comments
<b>Data-related activity - general</b>					
Maintain statistics and other generic management data in relation to the historic environment.	2;1	3	Quarterly	Minor change	
Maintain a register of and monitor all designated assets in council ownership	3	1	Quarterly	No change	
Prepare state of the historic environment reports	4	1	Annually	No change	
Contribute to the management of archives and records (artefact and documentary) including key files relating to listed buildings, listed building consents, etc.	4	2	Daily	Minor +	
Prepare and maintain GIS information (on the planning system or SMR/HER)	4	1	Daily	Major+	Linkages to and possible influences from E-planning and E-government agendas
Reports on service to corporate management (annual reports/assessment procedures etc)	4	2	Annually	No change	
Identify and liaise with local conservation contractors and craft workers etc	4		Quarterly	No change	
Provide (guide to) information for local history and local studies including photographic collections?	4	2	Monthly	Minor+	
<b>Data-related activity – SMR/HER</b>					
Maintain the sites and monuments records(SMR) / historic environment record (HER)(including built environment, terrestrial and Marine and managing local lists as well as information on undesignated assets etc)	3	1	Daily	Major+	
Enhancement of HERs	4	1	Daily	Major+	
<b>Data-related activity - designation</b>					
Maintain copies of the statutory lists for local consultation	1	3	Daily	Minor change	

Identify and designate conservation areas, including consultation, inclusion of Article 4s etc	1	2	Annually	Minor+	
Recommend and progress Tree Preservation Orders (often of historic significance)	1	3	Monthly	No change	
Advise on Certificates of Immunity (or equivalent) where applicable	2	3	Annually	Major+	
Advise on Certificates of Immunity (or equivalent) where applicable	2	3	Annually	Major+	
Investigate and serve Building Preservation Notices	2	3	Annually	No change	
Provide advice to local authorities on potential of historic environment for designation, local and national	3	2	Weekly	Minor +	Possible changes arising from the PPS and its associated guidance.
Develop maintain and promote local lists	3	1	Daily	Major+	
Provide Historic Environment information to English Heritage for designation and advise accordingly	4	2	Quarterly	Major+	
Advise National Heritage Agencies on designation	4	2	Monthly	Minor+	
Work with other partners to encourage the inscription of World Heritage Sites and work on the management of inscribed sites.	4	3	Infrequently	No change	
<b>Data- related activity - Heritage at Risk</b>					
Maintain an Assets at Risk Register, (Heritage at Risk (HAR), etc) including surveys and Field Warden duties	4	1	Monthly	No change	Possible changes arising from the PPS and its associated guidance.
Monitor condition of un-designated HE assets	4	1	Annually	No change	
<b>Research/Interpretation</b>					
Specify, or provide advice, on historic environment investigations e.g. for evaluation and interpretation purposes	1	3	Daily	No change	Possible changes arising from the PPS and its associated guidance.
Prepare and/or contribute to national; regional and local research frameworks/ agendas or equivalent	4	1	Quarterly	No change	Possible changes arising from the PPS and its associated guidance.
Manage and interpret heritage sites and attractions	4	2	Monthly	No change	
Author, contribute to, edit, fund and publish local guides on the historic environment.	4	1	Quarterly	Minor +	

Specify, or provide advice, on non-rescue led historic environment investigations e.g. for evaluation and interpretation purposes	4	2	Quarterly	No change	
Investigate and record – or oversee - historic assets (buildings & archaeology)	4	3	Annually	No change	
<b>Policy</b>					
Contribute to, prepare and implement Local Development Frameworks, or their equivalent, including policies relating to the historic environment	1	3	Weekly	No change	Possible changes arising from proposals within the planning bill
Undertake, commission, assess or require Strategic Environmental Assessments of plans	1	3	Quarterly	No change	
Scope and assess EIA/SEA	1	3	Monthly	No change	
Prepare, or contribute to Supplementary Planning Documents relating to historic environment	2	1	Quarterly	No change	Possible changes arising from proposals within the planning bill
Prepare, or contribute to Community strategies and form Community Planning partnerships or equivalent	2	3	Annually	No change	Possible changes arising from proposals within the planning bill
Prepare planning briefs for new development affecting the historic environment, [including development outside the planning system]	3	2	Quarterly	No change	
Prepare/contribute to council Cultural Strategy or equivalent	3	3	Annually	No change	
Publish local guidance on the conservation of prehistoric and historic environments	4	1	Quarterly	Minor +	
Prepare, maintain and implement local Heritage Strategy [or equivalent?]	4	1	Annually	No change	
Prepare local HE guidance for developers	4	1	Annually	No change	Possible changes arising from proposals within the planning bill
Liaise with local/regional development agencies (or equivalent) in promotion of HE re heritage-led regeneration and its contribution to the sustainability agendas	4	1	Monthly	No change	Possible changes arising from proposals within the planning bill Changes to the role of RDAs
Take part in policy liaison on matters to do with the Historic Environment e.g. IHBC, ALGAO, national heritage agencies	4	2	Monthly	No change	
Contribute to local biodiversity (?) audits or equivalent	4	3	Quarterly	No change	
<b>Outreach - external</b>					

Act as point of contact for the public for local HE information	3	3	Daily	Minor+	
Advise, promote and contribute to Regional/City Conservation Trusts or equivalent	3	3	Quarterly	No change	
Work with national organisations charged with the promotion and conservation of the historic environment e.g. National Amenity Societies; Professional bodies; heritage agencies and property owning and developing trusts	4	1	Monthly	No change	
Act as point of contact for national heritage agencies and interests	4	3	Monthly	Major+	
Undertake outreach/publicity on the historic environment through lectures, talks exhibitions etc.	4	1	Monthly	Minor+	
Run local Heritage Open Days and equivalent	4	1	Annually	No change	
Liaise with museums service (including the collection, recording and preservation of artefacts)	4	2	Monthly	No change	
Foster voluntary HE work	4	1	Monthly	Minor +	
Provide or take part in education projects and programmes on the historic environment	4	1	Quarterly	Minor+	
Administer and contribute to national and local HE award schemes	4	1	Annually	No change	
Establish, manage and contribute to local amenity and heritage forums	4	3	Monthly	Minor +	
Liaison with major HE property and asset owners in area e.g. National Trust	4	2	Weekly	Major+	
Contribute to local tourism forums including production and implementation of tourism strategy	4	3	Quarterly	No change	
Provide professional training via seminars, CPD, student placements etc	4	1	Quarterly	Minor +	
<b>Outreach – internal</b>					
Liaise across the local public service as informed HE leader, adviser and promoter	3	2	Daily	Minor +	
Advise and guide planning (and related) committees and key LA representatives (including Champions) on HE and related design issues	3	2	Weekly	No change	Possible changes arising from increase in scope of delegated powers
Monitor, maintain and support standards across the service, including liaison with quality assurance processes (prof. bodies; CPD etc)	4	1	Weekly	No change	Possible changes arising from the PPS and its associated guidance.

<b>Historic Environment Management- General</b>					
Advise on the HE implications of the Building Regs, FENSA lists, etc	1	3	Weekly	No change	
Advise on the disposal of heritage assets within council guardianship e.g. redundant school buildings or affected land	1	3	Quarterly	No change	
Advise on the building and adaptation of public buildings [under new legislation] e.g. schools and halls to new uses or to meet DDA, and smoking restrictions	2	3	Annually	No change	
Provide advice to others responsible for the maintenance of historic bridges and viaducts	2	3	Monthly	Minor+	
Advise on the maintenance and repair of heritage assets and assets in conservation areas	3	3	Daily	No change	Possible changes arising from proposals within the planning bill, particularly changes to permitted development rights
Provide advice to others responsible for the maintenance of heritage assets in council ownership and advising on property management issues as needed	3	3	Monthly	No change	
Develop and agree management guidelines for local authority historic assets, including the production (or manage the production by consultants) of conservation statements and conservation plans for local authority assets	3	3	Annually	No change	
Contribute to management and enhancement of the public realm in general, including as appropriate undertaking urban design and related place making activities and public realm works, including those with historic environment interests, including on the maintenance and replacement of street surfaces and furniture	4	3	Quarterly	No change	
<b>Historic Environment Management- Heritage at Risk</b>					
Take pro-active action over heritage at risk within the local authority area	4	1	Weekly	No change	
<b>Historic Environment Management- Conservation Areas, etc</b>					
Undertake conservation area appraisals and deliver conservation area management plans	2	1	Monthly	Major+	

Prepare, consult and implement Article 4 Directions covering development in Conservation Areas [and local listing?]	2	1	Monthly	Minor+	Possible changes arising from proposals within the planning bill
Bring forward schemes to conserve, enhance and improve conservation areas and comparable places	2	1	Annually	No change	
Initiate and project manage projects for the conservation of heritage assets e.g. THIs; CAPS etc..	4	1	Annually	No change	Application for funding are often on a cycle (annual; quarterly), administering a successful project is more frequent
Provide advice to owners and others on the management of undesignated heritage assets	4	3	Daily	Minor+	
<b>Historic Environment Management- Heritage Partnership Agreements</b>					
Negotiate, oversee implement and review management agreements or equivalent (including HPAs)	4	2	Quarterly	Major+	
<b>Historic Environment Management- Development Control</b>					
Specify investigative work in order to inform the process of determining an application for planning consent	1	3	Weekly	No change	
Specify investigative works arising from conditions applied as a result of granting of planning consent	1	3	Daily	No change	
Advise on applications for consent, conservation area (or equivalent planning) consent and for works in conservation areas	1	3	Daily	Minor+	Possible changes arising from proposals within the planning bill
Investigate and record heritage assets affected by development proposals	4	2	Annually	No change	
Advise on Planning Applications with impact upon the Historic Environment	1	3	Daily	No change	Possible changes arising from proposals within the planning bill
Participate in public inquiries and appeals	1	3	Monthly	No change	
Advise on agri-related impacts on landscapes and heritage assets, including cultivation (Class 1 consents)	1	1	Daily	Minor+	Possible changes to the administration of the schemes coming from DEFRA/Natural England
Advise on Petitions for Faculty, etc, (ecclesiastical exemption)	1	3	Monthly	No change	Liaison with DAC
Advise on Marine Asset Consent, where applicable	1	3	Annually	No change	
Administer Hedgerow Regulations in respect of HE	1	3	Annually	No change	
Monitor, advise, process and instruct works to trees in conservation areas	1	3	Monthly	No change	
Advise (esp. pre-application) on development impacts on HE	2	3	Daily	No change	Possible changes arising from proposals within the planning bill

Advise on amendments to designated assets and conservation areas	2	3	Quarterly	No change	
Serve repairs notices (or equivalent) as required (Urgent Works Notices)	2	3	Annually	No change	
Promote and serve Compulsory Purchase Orders (or equivalent) as required	2	3	Annually	No change	
Monitor the implementation of approved alterations to listed buildings and conservation areas	2	3	Daily	Minor+	
Take enforcement action in the case of unauthorised works to designated assets and conservation areas	2	3	Daily	Minor change	
Provide HE advice and oversight to statutory undertakers and equivalent	2;3	3	Weekly	Major+	Possible changes arising from proposals within the planning bill
Advise on relevant design aspects of proposals for new development and development initiatives with impacts on historic or sensitive areas, including urban design issues	3	3	Weekly	No change	
Monitor compliance with specifications and professional standards in work on the historic environment	3	3	Daily	Minor+	
Provide HE and archaeological advice to the Forestry Commission and equivalent	3	3	Monthly	No change	
Advise on wider cultural assets, including battlefields, designed landscapes, cultural symbols, parks, cemeteries etc	4	2	Monthly	Minor +	
Provide audits for agri-environment scheme applications under a national agreement	4	3	Daily	Minor +	
<b>Grants</b>					
Develop, fund, fundraise, promote and implement partnership regeneration schemes, including with local and regional development agencies, private sector etc	2	2	Monthly	No change	Application for funding are often on a cycle (annual; quarterly), administering a successful project is more frequent
Administer grants for the repair, maintenance and enhancement of heritage assets	2	2	Weekly	No change	
Promote, seek and administer external funding for the historic environment e.g. ERDF, Heritage Lottery Fund	4	1	Monthly	No change	Application for funding are often on a cycle (annual; quarterly), administering a successful project is more frequent