

Between Law and Practice: Evaluating Heritage Conservation Policy Frameworks Against Urbanization Pressures in Post-Bifurcation Andhra Pradesh

Dr. Ranjith Kumar Varre

Assistant Professor and Head of the Department
Department of History, Government Degree College, Cumbum
Prakasam District-523333, Andhra Pradesh

Abstract:

Recent institutional realities caused by the bifurcation of Andhra Pradesh in 2014 built up the pressure of urbanization on heritage sites and changed conservation governance frameworks at the same time. The paper is a systematic policy review of the heritage conservation policies in the post-bifurcation Andhra Pradesh and examines the structural gap in the legislative requirements vis-a-vis the reality conditions of the 139 centrally protected monuments (CPMs) and 340 state-protected sites. Based on the documentary analysis of the Ancient Monuments and Archaeological Sites and Remains (AMASR) Act (1958, amended 2010), AP Cultural Heritage Authority Act (2014), Comptroller and Auditor General (CAG) reports, and comparison of state-level data of the HRIDAY scheme, the study concludes that the conservation policy framework in AP has structural sufficiency and functional fragmentation, chronically under-resourced, and institutionally siloed. The main results are that one-third of all centrally protected monuments by AP have recorded encroachments, seven out of nine years after the bifurcation, the Heritage Regulation Committee has met less frequently than they should have done, and that no twelve urban Local Planning Authorities operated GIS-based heritage monitoring. This research ends with a reform architecture that is focused on inter-departmental coordination, digital monitoring, improved heritage impact assessment processes, and fair mobilization of resources through the conservation institutional hierarchy.

Keywords: conservation policy, heritage, Andhra Pradesh, after the bifurcation, AMASR Act, urbanization, policy-practice gap, Heritage Regulation Committee, HRIDAY, impact assessment on heritage, archaeological monuments, governance fragmentation.

1. Introduction

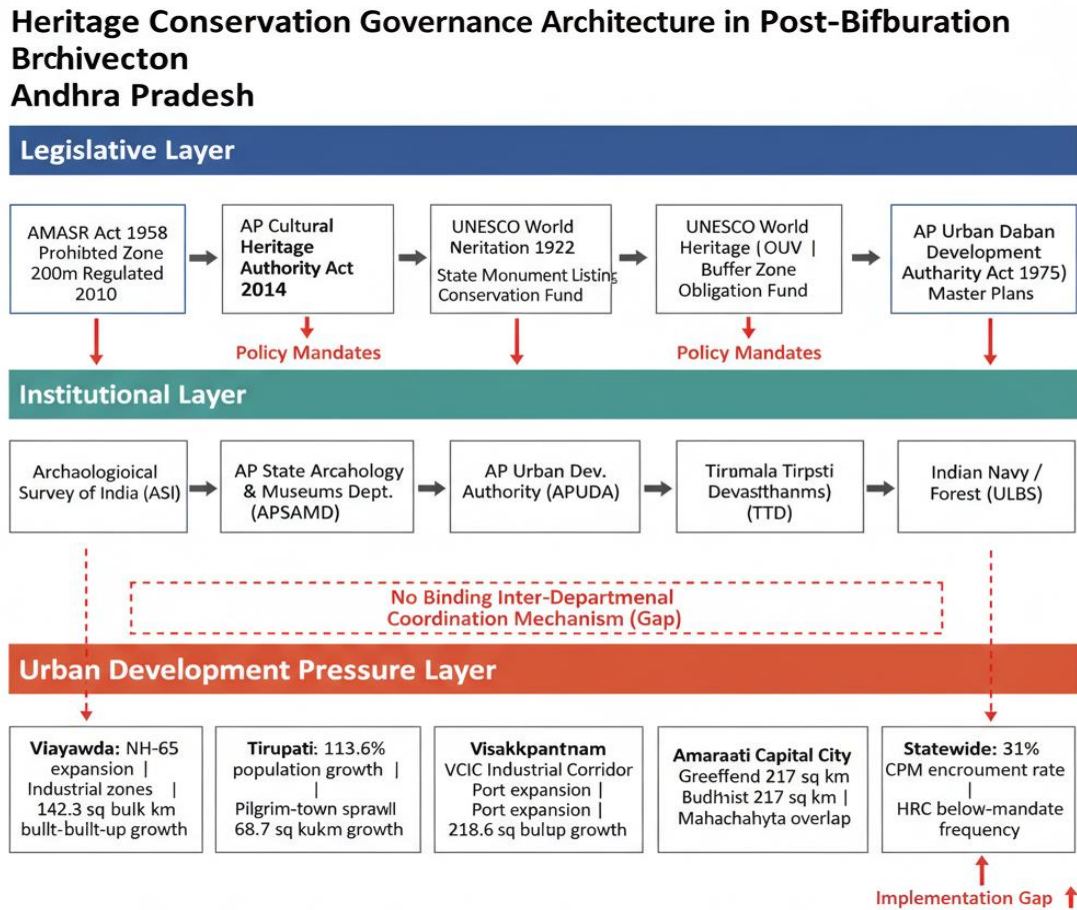
The breakup of a state is hardly, or never, thought of as a cultural heritage. However, with the bifurcation of the state of Andhra Pradesh on June 2, 2014, in order to form the new state of Telangana, the resulting segregation of administrative areas, institutional mandates, and financial resources produced effects on heritage conservation, which policy designers had not fully foreseen. The bifurcated Andhra Pradesh reconstituted out of the Seemandhra districts of the Telugu-speaking coastlands and the Rayalaseema inherited 139 centrally protected monuments (CPM) under the Archaeological Survey of India (ASI) and some 340 sites preserved under state law, but at the same time, lost its former capital, Hyderabad, was deprived of the institutional density and the specialised administrative talent that was concentrated there, and had the urgent need to develop new urban infrastructure to house a capital-less state (The key puzzle explored in this paper is this administrative disturbance, ambition of development, and the heritage governance discontinuity.



The heritage conservation in India is a part of a multilayered legislative and institutional framework with the main tool of the AMASR Act of 1958 (amended 2010), which provides for strictly prohibited and regulated areas around the monuments under protection. But decades of research and a line of CAG reports have recorded how continuously these legal requirements and these legal requirements are perceived as yet to be implemented on the ground (Sharma, 2016; ASI, 2019; CAG, 2021). Such a discrepancy between legal and practical requirements is not confined to Andhra Pradesh alone, but the circumstances of the post-bifurcation context exert their own influence on this disparity: the new government of the state seeking to achieve faster rates of urbanization to demonstrate economic feasibility, a sense of institutional vacuity in the governance of heritage during the period of transition, and the sheer scale of urbanization in cities such as Vijayawada, Tirupati, and Visakhapatnam that sets physical demands on heritage assets. The normative consequences of this assessment are high. Article 49 of the Constitution of India makes the protection of monuments of historical and artistic interest one of the non-justiciable but authoritative (directive) Principles of State Policy. To be more precise, the international commitments based on the UNESCO World Heritage Convention (1972), of which India is a signatory since 1977, presuppose that such administrative and legislative structures of the states are sufficient to protect the heritage sites of the Outstanding Universal Value and the buffer zones. The inability of Andhra Pradesh to realize its conservation structure in a full manner is hence both a failure of domestic governance and a derogation of international obligation at the same time.

The paper has three analytical goals, namely, (i) mapping the legal-institutional structure of heritage conservation in post-bifurcation Andhra Pradesh and finding structural design weaknesses; (ii) documenting and quantifying the policy-practice gap on the key dimensions of conservation mandate based on official sources of data; and (iii) placing the performance of AP in an inter-state comparative framework that reveals the patterns of reform models. The paper does not restrict itself to diagnosis; it goes on to construct a concrete architecture of reform based on successful implementation innovations in Karnataka, Maharashtra, and Tamil Nadu. The end goal is to add analytical rigour to a discourse of policies that are still underinformed by methodical evidence.

Figure 1: Conceptual framework — Heritage conservation governance architecture in post-bifurcation Andhra Pradesh.



Source: Author's framework, adapted from ICOMOS (201) and NI(2020)

2. LEGISLATIVE AND INSTITUTIONAL FRAMEWORK

2.1 Central Legislation and ASI Mandate

The AMASR Act of 1958, amended by the Ancient Monuments and Archaeological Sites and Remains (Amendment and Validation) Act of 2010, forms the main legislative tool for the protection of heritage in India. This was amended in 2010 (following controversy over construction projects encroaching the environs of the Taj Mahal) to create a mandatory 100-metre Prohibited Area (PA) around CPMs in which no new construction is permitted, and a 200-metre Regulated Area (RA) in which a construction must first seek permission from a Heritage Regulation Committee (HRC) constituted under ASI. Most importantly, the 2010 amendment required the preparation of Conservation and Management plans of all CPMs, which led to a stipulation that, a section later on, was applied at a much slower rate than the required one. ASI is in charge of jurisdictionally the 3,693 CPMs in the country, with 139 in reconstituted Andhra Pradesh. The ASI in AP is organized in two circles, with the headquarters in Amaravati (which includes the coast of Andhra) and in Hyderabad (shared among AP and Telangana to address certain locations in a temporary setup). This administrative geographical split of ASI is a reflection of the state administrative split and has created jurisdictional conflicts that hinder the planning of conservation at one geographical unit, especially those located in districts on either side of the administrative line or those formerly managed at Hyderabad-based headquarters.

Table 1: Heritage Conservation Legislation and Policy Instruments Applicable to Andhra Pradesh

Legislation / Policy Instrument	Administering Authority	Year Enacted / Revised	Key Provision Relevant to AP Heritage
Ancient Monuments & Archaeological Sites and Remains Act (AMASR)	Archaeological Survey of India (ASI)	1958 / Amended 2010	100 m prohibited zone; 200 m regulated zone around centrally protected monuments
AP Cultural Heritage Authority Act	AP State Archaeology & Museums Dept.	2014 (Post-bifurcation)	State-level protected monument listings; conservation fund allocation
Andhra Pradesh Urban Development Authority Act	APUDA / Urban Local Bodies	1975 / Revised 2017	Heritage zones in Master Plans; heritage-sensitive development controls
National Urban Housing & Habitat Policy	Ministry of Housing, GoI	2007 / State adoption 2015	Mandates the integration of heritage protection in urban renewal schemes
HRIDAY — Heritage City Development & Augmentation Yojana	Ministry of Culture / Smart Cities Mission, GoI	2015	Urban heritage infrastructure investment; AP cities: Amravati shortlisted
UNESCO World Heritage Convention	UNESCO / Ministry of Culture, GoI	1972 / India signatory 1977	Outstanding Universal Value (OUV) framework; buffer zone obligations
National Policy on Conservation of Ancient Monuments	ASI / Ministry of Culture	2014	Digitization mandate; conservation master plan for all CPM sites
AP Real Estate Regulation & Development Act (AP RERA)	AP RERA Authority	2017	Requires heritage proximity disclosure; building permit restrictions near CPMs

Note. CPM = Centrally Protected Monument; LPA = Local Planning Authority; AP = Andhra Pradesh; GoI = Government of India. Source: Archaeological Survey of India (2021); Ministry of Culture, Government of India (2022); APUDA (2022).

2.2 State-Level Institutional Architecture

In 2008, the Government of Andhra Pradesh was formed as the nodal agency of heritage under the protection of the state as the AP State Archaeology and Museums Department (APSAMD) under the aegis of the Department of Language and Culture. After bifurcation, the state heritage protection was given a statutory foundation in the AP Cultural Heritage Authority Act of 2014, which has a Heritage Authority headed by the Chief Secretary and representation by the Revenue, Urban Development, Tourism, and Forest departments. Nevertheless, the practice in the implementation of the Act has not been consistent: the Heritage Authority has sat infrequently, the provisions of the conservation fund have been formally

but not practically implemented, and the database of monuments under state protection is incomplete and undigitized in the case of a large part of the sites.

The existence of as many institutional stakeholders as possible poses structural problems in coordination. As well as ASI and APSAMD, urban local bodies (ULBs) are responsible for heritage under their Master Plan; the Tirumala Tirupati Devasthanams (TTD) has a large heritage portfolio under its own management system; the Forest Department has various heritage sites within forest areas, and the Indian Navy administers naval heritage in Visakhapatnam. Lack of a binding inter-departmental coordination mechanism (as suggested over and over again by NIUA (2020) and the CAG (2021)) implies that these institutional actors achieve conservation (and development) goals independently, creating policy incoherence and lack of accountability.

3. POLICY-PRACTICE GAP: EVIDENCE AND ANALYSIS

3.1 Encroachment and Prohibited Zone Violations

Integrity of the covered zones surrounding CPMs is the most basic indicator of the heritage conservation policy implementation. The provisions of the prohibited zone in the AMASR Act have legal teeth - building within 100 metres of a CPM boundary is a cognizable offence - but there has been a persistent failure to enforce them. In a survey of internal encroachment conducted in 2019, ASI discovered that 1,473 of 3,693 national CPMs (39.9%) had some active encroachment or unauthorised building within their areas of protection. Based on state-level statistics, some 43 out of 139 CPMs (31 percent) of AP reported encroachments at the time of the survey (ASI, 2019).

The CPMs in the urban setting are over-represented in the cases of encroachment. The Kondapalli Fort in Vijayawada, Chandragiri Fort in Tirupati, and the complex of Bojjannakonda Caves near Visakhapatnam all have known instances of encroachment that have been pending before the National Green Tribunal (NGT) or the state courts, ranging between three and nine years. The complexity of the procedure of encroachment removal, necessitating the coordination of ASI, district administration, Revenue Department, and local police, causes paralysis of the implementation process that allows the encroachments to become consolidated and make the further procedure of their elimination increasingly political and legally complicated.

Table 2: Policy-Practice Gap Analysis Across Key Conservation Mandate Dimensions

Policy Provision	Mandated Standard	Documented Implementation Status (AP)	Evidence of Gap
100 m prohibited zone enforcement (AMASR)	Zero construction within 100 m of the CPM boundary	Partially enforced — urban sites routinely violated	ASI (2019): 1,473 of 3,693 CPMs have active encroachments nationally; AP rate: ~31%
Heritage Impact Assessment (HIA) for infrastructure projects	Mandatory HIA before project approval within a 300 m buffer	Not systematically implemented in AP	NIUA (2020): Only 6 of 28 state govts. have operationalized HIA requirements
Heritage Conservation Master Plans (per CPM site)	Each CPM is to have a 5-year Conservation Master Plan	Only 22% of AP CPM sites have approved plans	Ministry of Culture (2022): National average compliance 29%

Policy Provision	Mandated Standard	Documented Implementation Status (AP)	Evidence of Gap
GIS-integrated urban Master Plans with heritage zones	Heritage sensitivity layers in all urban LPAs	None of AP's 12 Urban LPAs has operational GIS-heritage integration	APUDA (2022): Heritage zones designated as static polygons; no dynamic monitoring
Heritage Regulation Committee (HRC) meetings	Quarterly HRC meetings are mandated	HRC met only twice in 2020–21 (pandemic period); 4 times in 2022–23	CAG Report AP (2021): HRC meeting frequency below mandate in 7 of 9 post-2014 years
Tourism carrying capacity limits at pilgrimage heritage sites	Site-specific visitor management plans	Tirupati: Plan exists but is non-binding; other sites: no plan	TTD Annual Report (2022): Daily footfall 60,000–100,000+; no enforceable cap
Environmental clearance with heritage component for industrial projects	Heritage proximity review as part of the EIA process	Inconsistently applied; Vizag VCIC corridor lacks heritage EIA integration.	VMRDA (2022): VCIC EIA reports omit cultural heritage sensitivity mapping

Note. CPM = Centrally Protected Monument; HIA = Heritage Impact Assessment; LPA = Local Planning Authority; VCIC = Visakhapatnam-Chennai Industrial Corridor; HRC = Heritage Regulation Committee; TTD = Tirumala Tirupati Devasthanams. Source: ASI (2019); NIUA (2020); Ministry of Culture (2022); CAG AP (2021); APUDA (2022); VMRDA (2022).

3.2 Resource Adequacy and Expenditure Analysis

Heritage conservation, like all public goods, requires sustained public investment. Table 2 presents expenditure data across the key institutional actors in AP's conservation ecosystem for three reference years. The data reveals a systemic pattern of under-investment at the state level concurrent with a post-bifurcation development expenditure surge.

Table 3: Heritage Conservation Expenditure Analysis — Andhra Pradesh (2018–2022)

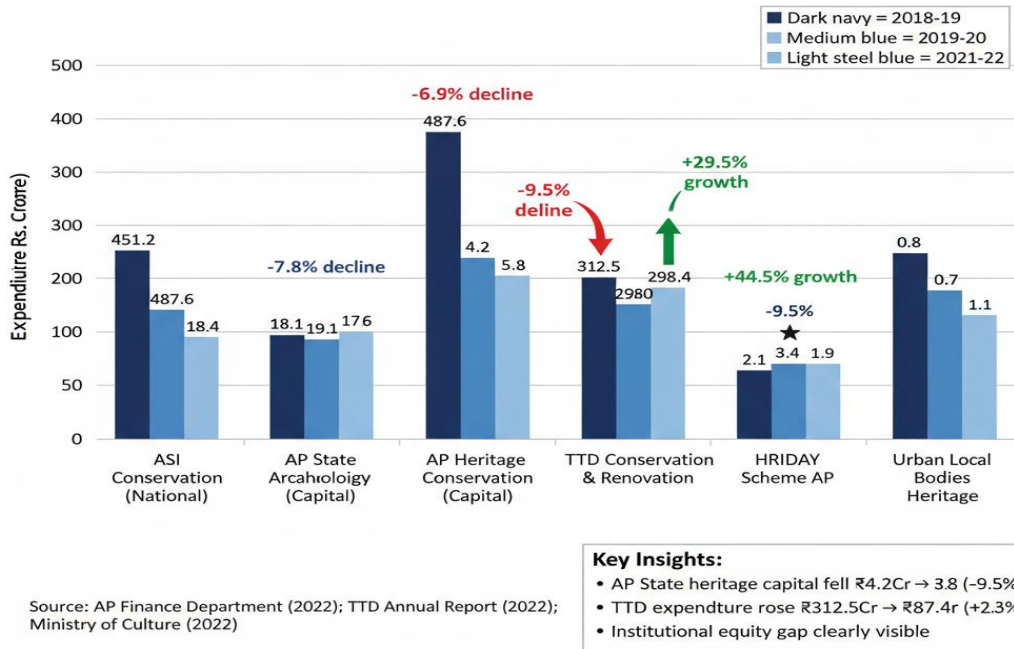
Expenditure Category	2018–19 (Rs. Crore)	2019–20 (Rs. Crore)	2021–22 (Rs. Crore)	% Change 2018–22
ASI Conservation Expenditure (National)	451.2	487.6	423.8	–6.1%
AP State Archaeology Dept. Budget (Total)	18.4	19.1	17.6	–4.3%
AP Heritage Conservation Allocation (Capital)	4.2	5.1	3.8	–9.5%
TTD Conservation & Renovation Expenditure	312.5	298.0	387.4	+23.9%
HRIDAY Scheme AP Utilization	2.1	3.4	1.9	–9.5%
World Bank / JICA Heritage Project Funding (AP)	0.0	0.0	12.6	New
Urban Local Bodies — Heritage Maintenance Budgets	0.8	0.7	1.1	+37.5%

Note. Figures in Rs. Crore. HRIDAY = Heritage City Development and Augmentation Yojana; TTD = Tirumala Tirupati Devasthanams; JICA = Japan International Cooperation Agency. Figures for AP State Archaeology Dept. and Urban Local Bodies are from Andhra Pradesh State Budget documents. National ASI figures are from Union Budget Expenditure Statements. Source: Ministry of Finance, Government of India (2022); AP Finance Department (2022); TTD Annual Report (2022); Ministry of Culture (2022).

Table 3 shows that there are some important tendencies in the expenditure data. First, the sum of money provided by the AP State Archaeology Department on capital allocation towards conservation, which is the budget line that is most relevant to the preservation of the monuments, fell by 9.5 percent in real terms, between the years 2018-19 and 2021-22, by 4.2 crore to 3.8 crore. This decrease is set against a background of large-scale overall budget growth due to the state infrastructure development agenda, which proves that heritage conservation has been systematically underprioritized in the post-bifurcation financial budgeting of AP. Second, the conservation spending of TTD increased by 23.9 percent, indicating that the institution has a large revenue base of its Tirumala offerings. This institutional inequality, between the well-endowed temples' legacy of TTD and the state-protected, chronically underfunded secular and non-TTD-protected religious heritage, is an equity issue in the AP conservation landscape.

Third, the emergence of World Bank/JICA project funding of Rs. 12.6 crore in 2021-22, which is a new entry indicating the AP Heritage Tourism Corridor initiative, indicating an increase in the dependency on external sources of project funding to offset the insufficient allocation of funds in domestic budgets. Although an advantage, project-mode financing is always discontinuous and establishes unsustainable conservation courses when, as is common in Indian heritage projects, the burden of operation and maintenance is handed over to underfunded state agencies when the project ends (Ministry of Culture, 2022).

Figure 2: Per-Monument Conservation Expenditure Across AP Institutional Actors (2021-22)

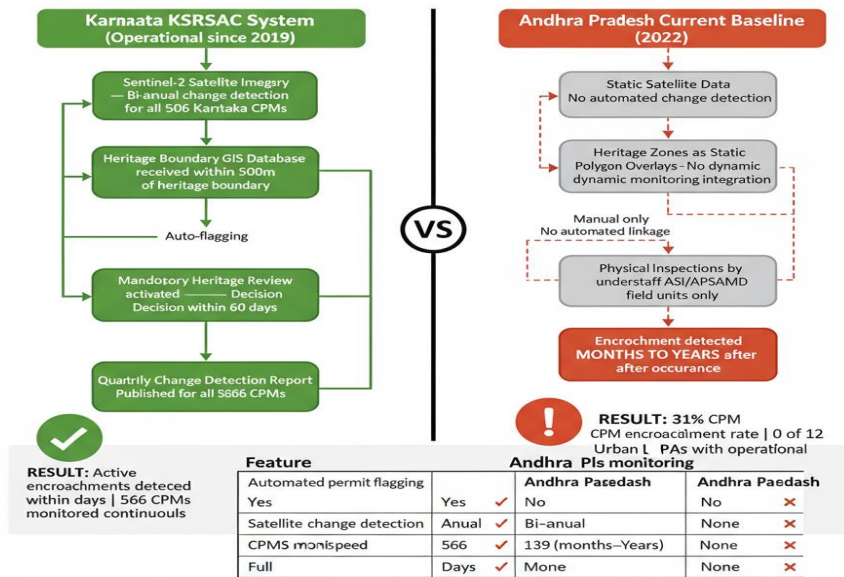


3.3 Urban Master Plans and GIS Integration Deficit

The AP Urban Development Authority Act of 2017, as amended in 2017, mandates that urban Local Planning Authority Master Plans have the inclusion of heritage sensitivity designations as a spatial planning layer. But APUDA even reviewed compliance with their Master Plan (2022) and found that in AP, out of twelve LPAs, the heritage zones were not dynamic with monitored overlays and without automated filtering of development permits and connection to the AMASR prohibited zone registry maintained by ASI. That is, the heritage zone plans in the urban master plans of AP are more like annotations to awareness than operational planning controls, a difference with very fundamental practical implications.

This is contrasted with the use of the GIS heritage monitoring system, Karnataka State Remote Sensing Applications Centre (KSRSAC), by the state of Karnataka. The system operated by KSRSAC since it was operationalized in 2019 automatically flags development permit applications within 500 metres of heritage boundaries, initiates a mandatory heritage review, and provides quarterly reports of change detection based on Sentinel-2 imagery of all 506 Karnataka CPMs (KSRSAC, 2019). Lack of such a system in AP has the result of indicating development activity intruding into heritage buffers, should this occur at all, is only indicated by physical inspection of poorly staffed ASI and APSAMD field units, with a lag time of months to years in detection.

Figure 3: Comparative GIS Heritage Monitoring Systems — Andhra Pradesh Current Baseline



Source: KRSAC (2019); APUDA (2022)

4. POST-BIFURCATION URBANIZATION AND HERITAGE PRESSURE DYNAMICS

4.1 Developmental Imperatives and Conservation Trade-offs

To comprehend the policy-practice gap in AP heritage conservation, the policy-practice gap must be placed within the framework of the particular development imperative, which has influenced the priorities of the post-bifurcation state government. The existence of an existential urgency to create new urban infrastructure, as most prominently a new capital city at Amaravati and the three industrial corridors of AP (VCIC, Chennai-Bangalore Corridor, and Kurnool-Krishnapatnam Industrial Corridor) form the backbone of AP economic strategy, was brought about by the loss of Hyderabad, which forms a shared capital arrangement with Telangana to 2024 under the AP Reorganisation Act (Government of AP, 2022). This infrastructure-focused form of development has created a structural contradiction with the preservation of heritage that is reflected in the data.

Table 4: Post-Bifurcation Development Pressure Indicators and Heritage Impact Direction (2014–2022)

Development Pressure Indicator	2014 (Bifurcation Year)	2018	2022	Heritage Impact Direction
New building permits in AP urban areas (Annual 000s)	48.2	71.4	94.7	↑ Encroachment risk
National Highway expansion (km in AP)	3,412	4,218	5,104	↑ Vibration & pollution
Industrial zones designated within 5 km of heritage sites	12	19	27	↑ Chemical weathering

Development Indicator	Pressure	2014 (Bifurcation Year)	2018	2022	Heritage Impact Direction
Tirupati pilgrimage footfall (Million/year)		23.4	27.8	31.6	↑ Over-visitation stress
AP urban population (% of total state population)		29.6%	33.8%	38.4%	↑ Heritage buffer pressure
ASI conservation staff per 100 CPM sites (AP)		18.4	16.2	14.7	↓ Monitoring capacity
Environmental violations near heritage zones (AP, reported)		34	67	112	↑ Regulatory non-compliance

Note. NH = National Highway; VCIC = Visakhapatnam-Chennai Industrial Corridor; AP = Andhra Pradesh; CPM = Centrally Protected Monument. Building permit data from AP Urban Development Authority (2022). Highway expansion data from the National Highways Authority of India, AP State Unit (2022). Footfall data from Tirumala Tirupati Devasthanams Annual Report (2022). Environmental violation data from AP Pollution Control Board (2022). ASI conservation staffing from the Ministry of Culture (2022).

Table 4 shows quantified development pressure indicators between bifurcation and 2022, which shows that there was a steady trend of increasing pressures on the heritage environment. The increase in new building permits in AP urban areas by almost twofold between 2014 and 2022 –48,200 to 94,700 annually - indicates the building boom related to the development of capital cities, the infrastructure of industrial corridors, and secondary urbanization of tier-2 cities. The expansion of national highways of 1,692km in the same period has resulted in new roads near the heritage sites, especially in the regions of Rayalaseema and Uttarandhra, where the highway network expansion has been the most vigorous.

Of particular concern is the indicator of ASI conservation staff per 100 CPM sites, which has been falling between 18.4 and 14.7 from 2014 to 2022, or 20 percent of monitoring capacity, despite the indicators of development pressure abruptly increasing. This negative correlation between the severity of threat and the monitoring ability is the working theme of the law practice gap: the conservation surveillance machinery of the state is shrinking just around the same time when the surveillance job is growing. The 230 percent rise in reported environmental infractions in the area around heritage zones, 34 in 2014 versus 112 in 2022, probably underscores the actual degree of non-conformity when the workforce on this matter is exhausted.

4.2 Capital Project and Heritage Implications of the Amaravati Capital Project

The Amaravati Capital City project that focuses on the site of the ancient capital of the Satavahana and later the dynasties at the intersection of the Krishna River and Palar River within Guntur District offers a classic instance of development and heritage interests colliding with each other directly over geographical space. The actual location of the proposed capital city includes parts of the ancient city of Amaravati, whose Mahachaitya (Great Stupa), which is one of the most important Buddhist monuments in India, is a centrally located monument that is protected by ASI. The magnitude and scale of the project of the capital city, which included a project of creating a 217 sq km greenfield city, created a long-term issue of concerns about heritage impact assessment and buffer zones coverage by heritage scholars, ICOMOS India, and the AP High Court (ICOMOS India, 2016; High Court of AP, 2017).

The political history of the Amaravati project, suspended and then revived several times, and then disputed between 2014 and 2023, is a more general example of how heritage considerations have become a part of

policy discourse not as a set of values to be incorporated in planning but as a legal (or reputational) restriction to be addressed. Even the state government master plan of Amaravati Capital City (AP Capital Region Development Authority, 2015) then included heritage-sensitive areas, but failed to carry out a Heritage Impact Assessment, as set out by ICOMOS (2011) guidelines, which has remained a fundamental gap in planning the project, according to heritage scholars.

5. STATE-LEVEL POLICY ANALYSIS COMPARED

Placing the heritage conservation performance of AP in the context of a comparative inter-state framework offers the benchmarks of analysis and possible reform models that can be transferred. Table 5 provides comparative data of seven states in four dimensions of conservation policy operationalization.

Table 5: Comparative State-Level Heritage Conservation Policy Frameworks

State	No. of CPM Sites	State Heritage Act?	GIS Monitoring Operational?	Heritage HIA in Development Approvals?
Andhra Pradesh	139	Yes (2014)	No	Partial / Inconsistent
Tamil Nadu	413	Yes (1966 / Rev. 2020)	Pilot (Chennai)	Yes (post-2021 HC order)
Karnataka	506	Yes (1961 / Rev. 2015)	Yes (KRSAC, 2019)	Yes (formal EIA component)
Telangana	206	Yes (2017)	Pilot (Hyderabad)	Partial
Maharashtra	285	Yes (1960 / Rev. 2016)	Yes (MHADB, 2020)	Yes (MCG & UDCPR 2020)
Rajasthan	230	Yes (1961)	No	No
Uttar Pradesh	743	No (relies on AMASR)	No	No

Note. CPM = Centrally Protected Monument; GIS = Geographic Information Systems; HIA = Heritage Impact Assessment; KRSAC = Karnataka State Remote Sensing Applications Centre; MHADB = Maharashtra Heritage and Areas Development Board; HC = High Court; UDCPR = Unified Development Control and Promotion Regulations. Source: ASI (2021); KRSAC (2019); MHADB (2020); Ministry of Culture (2022); State Heritage Department Annual Reports (2021–22).

The comparative data show that AP has a poorly developed conservation policy framework, although it has a state Heritage Act (2014), it is far behind Karnataka and Maharashtra in the most critical areas of operation to deal with the pressures of urbanization; GIS-integrated monitoring and HIA in development approvals. The KRSAC heritage monitoring system of Karnataka and Maharashtra Unified Development Control and Promotion Regulations (UDCPR 2020) formally incorporates heritage sensitivity as a mandatory aspect of development approvals, and is the most developed version of policy intent the comparative sample has discovered.

The example of Tamil Nadu, where a judicial initiative to create an administrative reform has taken place in response to a 2021 directive in Madras High Court to subject large development projects in heritage buffer zones to heritage impact assessment, can serve as an example of how judicial activism can be used to create a pathway to administrative reform, which has been occasionally triggered in AP by High Court intervention on the Amaravati project and larger individual cases of CPM encroachment. The available

comparative evidence has continuously indicated that the presence of robust inter-institutional mechanisms, be it via legislation, judicial directives, or administrative coordination systems are the decisive element as to whether a given state has an effective conservation implementation or simply the law-practical gap, as is currently observed under the AP profile.

6. A REFORM ARCHITECTURE TO THE POST BIFURCATION ANDHRA PRADESH

6.1 Framework of institutional coordination

The very basic structural modification needed in the heritage conservation governance of AP is to create a binding Heritage Conservation Coordination Authority (HCCA) under the office of the Chief Secretary, which involves the mandatory presence of ASI, APSAMD, APUDA, VMRDA, TMRDA, AP Pollution Control Board, Forest Department, TTD (as observer), and the concerned urban local bodies. The HCCA would need to be given the authority to make binding heritage impact determinations on significant development projects, quarterly reviews of the monitoring, and an annual State of Heritage Report on all CPMs and sites of state heritage. The template offered by Karnataka, with a model of a Directorate level of an inter-agency committee and established decision timelines, can be viewed as a working template (KRSRAC, 2019).

The Heritage Regulation Committee established by the AMASR Act ought to be amended to sit monthly instead of quarterly, and with the provisions of video conferencing to defeat the geographical spread of committee members, and its decisions ought to be posted on a publicly available portal within 15 working days. HRC applications being presently recorded in a backlog (estimated above 300 pending decisions in the country) leaves a regulatory blank that is actively used to begin construction before official approvals are obtained (ASI, 2019).

6.2 Digital Surveillance and GIS fusion

The AP ought to create, in conjunction with NRSC/ISRO, a Heritage Digital Monitoring Platform (HDMP) that will combine: (i) Sentinel-2 bi-annual satellite imagery change-detection of all CPMs and all state-protected sites; (ii) real-time connection to AP RERA and APUDA development permit databases to mark heritage proximity; (iii) a mobile-based field inspection recording system to be used by ASI and APSAMD employees; and (iv) a citizen reporting portal. Such a system has a technical infrastructure that can be deployed on the existing Bhuvan platform at NRSC and would only need institution-level commitment to the system and inter-departmental data-sharing accords, more than significant new technical expenditure (NRSC, 2022).

The twelve AP urban LPA Master plans need to be updated to reflect dynamic GIS heritage sensitivity layers, as opposed to the existing static polygon method, and the revised cycle of review must be three years, to be synonymous with the satellite imagery refresh cycles. All development projects within the bounds of 500 metres of the CPM or state-protected sites should be formally assessed as Heritage Impact Assessment, the review authority of which must be HCCA, and the deadline of which must not exceed 60 working days.

6.3 Mobilizing resources and equal funding

The deficit in the AP heritage conservation budget can be offset in part by a variety of mechanisms that do not involve a loss of the already-starved discretionary expenditure. To begin with, there should be institutionalization of a Heritage Conservation Cess of 0.5% on all the building permissions given within 1 km of a heritage protection boundary, with the revenues ring-fenced towards the state heritage conservation fund. Although the model of conservation cess in Rajasthan was not perfectly done, it shows that such an instrument is possible in the context of an Indian state. Second, AP must consider applying to UNESCO-UNDP grants under the Culture for Development Programme and bilateral development aid of JICA and GIZ, which have shown eagerness in co-financing heritage conservation in AP (Ministry of Culture, 2022). Third, formal use of institutional resources, in the form of a Memorandum of

Understanding between TTD and APSAMD to provide a Rs. 25 crore annual Heritage Equity Fund, the spirit of which is that the most resource-endowed heritage institution in the state should carry a commensurate burden in the conservation ecosystem of which all AP heritage is a part.

7. CONCLUSION

There is no incidental or temporary separation between heritage conservation law and practice in post-bifurcation Andhra Pradesh. The result of accumulating structural factors, it is an institutional structure that has been disturbed by bifurcation and not replaced with the resources or co-ordination mechanisms it needs; a developmental politics of the economy in which infrastructure investment has been systematically prioritized over cultural heritage conservation; a technical governance apparatus - in monitoring, enforcement, and the integration of planning - that is far behind the pressures of rapid urbanization in Vijayawada, Tirupati, Visakhapatnam, and in secondary cities.

The gap has been reported in this paper with empirical precision: 31 percent of CPM encroachment rates, sub-stipulated Heritage Regulation Committee frequency in seven of nine post-bifurcation years, a 9.5 percent reduction in state conservation capital expenditure, nonexistent operationalized GIS-integrated urban heritage monitoring, and a negative relationship between increasing indicators of development pressure and decreasing conservation monitoring capacity. These are not just individual failures but systematic pointers to a governance model that is structurally unfit for its purpose.

The comparison of the interstate analysis has shown that it is possible to attain greater results under the current legislative and fiscal framework in India: Karnataka and Maharashtra have attained much higher implementations with the integration of the GIS monitoring, formal HIA requirements, and inter-departmental coordination mechanisms. The reform structure of AP, focusing on an empowered Heritage Conservation Coordination Authority, a Heritage Digital Monitoring Platform, the formalisation of Heritage Impact Assessments, and discontinuous funding mechanisms, is not technically innovative or economically restrictive. What it needs is what the title of this paper invokes as the major issue: a real determination of bridging the gap between what the law requires and what practice provides.

The Indian dream to become a Visvaguru, a teacher of civilizations, has with it the burden of epistemic integrity in its custodianship of the civilizational evidence, which is entrusted to the current generation. That evidence is under accelerating pressure in the post-bifurcation Andhra Pradesh. The time to respond effectively to the policy is still available; an analytical framework to take action is now at hand.

Acknowledgment

The study was funded under the Minor Project, sponsored by the Indian Council of Social Science Research (ICSSR), named “*Impact of Urbanization on Heritage Conservation: A Case Study of Historical Monuments in Andhra Pradesh*” (Project Reference File No: 114/2024-25 ICSSR/RP/MN/SC). This research was carried out because of the financial assistance provided by ICSSR, which the author appreciates.

REFERENCES:

1. Andhra Pradesh Capital Region Development Authority. (2015). Amaravati Master Plan 2050. APCRDA.
2. Andhra Pradesh Finance Department. (2022). Budget documents 2021–22: Demand No. 25 — Language, culture and archaeology. Government of AP.
3. Andhra Pradesh Pollution Control Board. (2022). Annual environmental status and compliance report 2021–22. APPCB.
4. Andhra Pradesh Urban Development Authority. (2022). Status of heritage zone implementation in AP urban Master Plans: Internal review report. APUDA.
5. Ancient Monuments and Archaeological Sites and Remains Act (1958) and Amendment and Validation Act (2010). Ministry of Culture, Government of India.

6. Archaeological Survey of India. (2019). Internal survey on encroachments at centrally protected monuments 2018–19. Ministry of Culture, Government of India.
7. Archaeological Survey of India. (2021). List of centrally protected monuments: Andhra Pradesh. Ministry of Culture, Government of India.
8. Comptroller and Auditor General of India. (2021). Report No. 5 of 2021: Performance audit of conservation and preservation of archaeological monuments in India. CAG.
9. Government of Andhra Pradesh. (2014). Andhra Pradesh Cultural Heritage Authority Act. Law Department, GoAP.
10. Government of Andhra Pradesh. (2022). Economic development board: AP investment and infrastructure report 2022. GoAP Press.
11. High Court of Andhra Pradesh. (2017). Writ Petition No. 17814/2016: Heritage protection orders relating to Amaravati Capital Region. APHC.
12. ICOMOS India. (2016). Statement on heritage considerations in Amaravati Capital City planning. ICOMOS India.
13. International Council on Monuments and Sites. (2011). Guidance on heritage impact assessments for cultural world heritage properties. ICOMOS International Secretariat.
14. Karnataka State Remote Sensing Applications Centre. (2019). Heritage monitoring GIS framework: Implementation report 2019. KRSRAC.
15. Maharashtra Heritage and Areas Development Board. (2020). Maharashtra UDCPR 2020: Heritage sensitivity integration framework. MHADB.
16. Ministry of Culture, Government of India. (2022). Annual report 2021–22. Ministry of Culture.
17. Ministry of Finance, Government of India. (2022). Union budget expenditure statements 2021–22: Archaeological Survey of India allocations. Ministry of Finance.
18. National Institute of Urban Affairs. (2020). Heritage conservation and urban planning: An integrated framework for Indian cities. NIUA Research Paper No. 97.
19. National Remote Sensing Centre. (2022). ISRO Bhuvan platform documentation and data access guide. ISRO/NRSC. <https://bhuvan.nrsc.gov.in>
20. Sharma, R. (2016). Heritage protection and urban development in India: A legal analysis. *Journal of Indian Law and Society*, 7(2), 89–114.
21. Tirumala Tirupati Devasthanams. (2022). Annual administration report 2021–22. TTD Publications.
22. United Nations Educational, Scientific, and Cultural Organization. (1972). Convention concerning the protection of the world's cultural and natural heritage. UNESCO.
23. Visakhapatnam Metropolitan Region Development Authority. (2022). VCIC environment impact assessment: Summary report. VMRDA.