

Pre-submission Tewkesbury Borough Plan (2011-2031)

Heritage Impact Assessment of Housing Site Allocations May 2020

1. Introduction

- 1.1 The potential impact of the housing site allocations on the historic environment has been an integral part of site selection process, as documented in Housing Background Paper (2019). Nevertheless, Historic England in their response to the consultation on the Pre-submission Tewkesbury Borough Plan question the historic environment evidence base underpinning a number of the plan's allocations. This paper has therefore been produced to address the response made by Historic England. It provides a more focused assessment of the potential impact of the plan's housing site allocations in relation to the historic environment.
- 1.2 A separate Heritage Impact Assessment (HIA) for housing site allocation ref. TEW1 (Land at Odessa Farm, Tewkesbury) has been produced and should be read alongside this paper. This paper should also be read in conjunction with the Council's Draft Heritage Strategy (April 2020) and the Housing Background Paper (October 2019).
- 1.3 This report focuses on the potential impact of the housing site allocations on designated, above ground heritage assets such as Listed Buildings and Conservation Areas. It does not include an assessment of the impact of the allocations upon below ground archaeology, nor does it consider the impact of the sites on non-designated heritage assets.

2. Screening

- 2.1 As a first step in this assessment, all of the housing site allocations have been screened for potential impacts on the historic environment. This has been used as a basis for determining whether further, more detailed assessment is required. The results of the screening exercise are set out at Table 1.

Table 1 – Screening of potential heritage impacts

Site	Location	Site area	Indicative capacity	Potential heritage impacts	Further assessment required?
TEW1	Land at Odessa Farm, Tewkesbury	10ha	100 dwellings	North-east part of site within Tewkesbury Conservation Area, adjacent to Historic Battlefield (Battle of Tewkesbury 1471), Listed Buildings with potential intervisibility with site	Yes - See HIA
TEW2	Land adjacent to John Moore Primary School, Wheatpieces, Tewkesbury	0.9ha	30 dwellings	Nearest heritage asset (Grade II Listed Building - Rudgeway Farmhouse List Entry Number: 1091355) is over 500m away with limited intervisibility due to tree belt to south, flat topography and intervening built development. Site also already has planning permission for 30 dwellings	No
TEW3	Spring Gardens, Tewkesbury	1.3ha	30-100 dwellings	A small area to the south-east of the site is located in Tewkesbury's Conservation Area, with the remainder being immediately adjacent to it. A Grade II Listed Building (Sheep Market Office - 1207491) is located immediately to the north of the site abutting its boundary, and there is a Grade II Listed Building (Church of Holy Trinity - 1201291) immediately to its south and abutting its boundary. There are numerous other Listed Buildings within the vicinity of the site, with a significant concentration along High Street.	Yes
TEW4	Healings Mill, Tewkesbury	1.5ha	100 dwellings	The principal buildings on the site (Healings Flour Mill and Warehouses) are Grade II Listed (1461284). The bridge connecting the site with Back of Avon/Quay Street is also Grade II Listed (1201293). There are numerous other Listed Buildings within the immediate and wider vicinity of the site, including the Grade I Listed Tewkesbury Abbey (1201159). The site is also within Tewkesbury's Conservation Area.	Yes

BIS1	Land adjacent Breaker's Yard, Bishops Cleeve	1.4ha	26 dwellings	Nearest heritage assets are some distance away with no intervisibility. Site already has planning permission for 26 dwellings	No
BIS2	Land at Homelands Farm, Bishops Cleeve	2.2ha	35 dwellings	Nearest heritage assets are some distance away with no intervisibility	No
BIS3	Land at allotments off A435, Bishops Cleeve	3.9ha	85 dwellings	Nearest heritage assets are some distance away with no intervisibility	No
WIN1	Land off Delavale Road/Orchard Road, Winchcombe	6.2ha	80 dwellings	Site is some distance away from multitude of heritage assets within central part of town although topography of area is noted. Landscape evidence (Winchcombe Town Landscape and Visual Sensitivity Study, Toby Jones Associates Nov 2014) finds that, if designed sensitively with a feathered built edge and new boundary planting, development on this site would not materially alter the appreciation of views from long distances. Note also the buffering effect of existing 20th century development adjacent to site and context this provides. Considered that impact of proposed development on the setting of town's heritage assets would be negligible	No
COO1	Land at junction of A38/A4019, Coombe Hill	4.9ha	50 dwellings	Barn at Grange Farm (Grade II Listed Building - 1304789) is the nearest heritage asset and is located approximately 60m to north of allocation boundary. A resolution to grant planning permission has however been made by the Council for the construction of 40 dwellings on the northern part of the site (ref. 17/01337/OUT). This found that the proposal would preserve the historic significance and setting of the listed building.	No
COO2	Land adjacent to the Swan PH	0.9ha	26 dwellings	Barn at Grange Farm (Grade II Listed Building - 1304789) is the nearest heritage asset and is located approximately 100m to the north-east of allocation boundary. A resolution to grant planning permission has however been made by the Council for the construction of 40 dwellings on the site (ref. 18/00173/FUL). This did not identify any impacts on the setting of this heritage asset	No

GOT1	Land to the north of Malleson Road, Gotherington (GNDP 2/1)	0.86ha	6 dwellings	There are no designated heritage assets within the vicinity of this site	No
GOT2	Land to the north of Gretton Road, Gotherington (GNDP 2/3)	1.25ha	10 dwellings	The nearest designated heritage asset (Willow Cottage - Grade II Listed Building 1091684) is approximately 75m away to the west. Site already benefits from planning permission for 10 dwellings (16/00336/OUT & 19/00422/APP) and is a housing allocation in the Gotherington Neighbourhood Plan.	No
MAI1	Land at Bell House Farm, Maisemore	0.7ha	15 dwellings	Planning permission and Listed Building Consent have previously been granted for the development of this site for 15 dwellings and the demolition of a number of curtilage listed buildings (14/00965/FUL & 14/00966/LBC). This found that the proposed demolitions do not involve outbuildings of any particular significance and that the proposed development would have an acceptable impact on the setting of Bell House Farmhouse (Grade II Listed - 1091342). Although these permissions lapsed in 2018, the principle of the proposed quantum of residential development has previously been established. Any new applications would be considered in this context and any heritage related objections are capable of being resolved through appropriate design and siting.	No
SHU1	Land at corner of Badgeworth Lane and A46, Shurdington	2.2ha	50 dwellings	Site is within the setting of a Grade II Listed Building located on the opposite side of the A46 (Lodge to Greenway Hotel - 1340145)	Yes
SHU2	Land north of Leckhampton Lane, Shurdington	1.2ha	20 dwellings	There are no designated heritage assets within the vicinity of this site	No

SHU3	Garage site at Harrison Road, Shurdington	0.57ha	15 dwellings	There are no designated heritage assets within the within the vicinity of this site	No
TOD1	Land adjacent to Pheasant Public House, Toddington	1.6ha	25 dwellings	Site is within setting of Toddington war memorial (1416720) located approximately 100m to the north-west. Planning permission was previously refused for the construction of 25 dwellings on the site (ref. 14/00915/OUT) and subsequently dismissed on appeal. The setting of this heritage asset did not feature as a concern in the application or appeal.	No
WOO1	Land adjacent Oxbutts Caravan park, Woodmancote	2.3ha	60 dwellings	There are no designated heritage assets within the within the vicinity of this site	No
BRO1	Land Adjacent To Hucclecote Road And Golf Club Lane, Brockworth	3.33ha	166 dwellings	There are no designated heritage assets within the within the vicinity of this site. Site has also received a resolution to permit 166 dwellings (18/01239/FUL)	No
BRO2	Nerva Meadows, Gloucester Business Park, Brockworth	3.3ha	106 dwellings	There are no designated heritage assets within the within the vicinity of this site	No
FOR1	Land at corner of Bishops Walk and School Lane, Forthampton	1.55ha	10 dwellings	Site is partly within the Forthampton Conservation Area. Forthampton is a heritage rich village and there are numerous Listed Buildings and non-designated heritage assets located around the village.	Yes

3. Methodology

- 3.1 The site allocations identified for further assessment in Table 1 have been assessed using the guidance on local plan making within the Historic England publication *'The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3'* (2015). The guidance states that *"Local plans must be prepared with the objective of contributing to the achievement of sustainable development (...). As such, significant adverse impacts on the three dimensions of sustainable development (including heritage and therefore environmental impacts) should be avoided in the first instance. Only where adverse impacts are unavoidable should mitigation or compensation measures be considered (...). Any proposals that would result in harm to heritage assets need to be fully justified and evidenced to ensure they are appropriate, including mitigation or compensation measures."*
- 3.2 The guidance sets out a 'Site Selection Methodology' in five steps:
- *STEP 1 Identify which heritage assets are affected by the potential site allocation.*
 - *STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s).*
 - *STEP 3 Identify what impact the allocation might have on that significance.*
 - *STEP 4 Consider maximising enhancements and avoiding harm.*
 - *STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness.*
- 3.3 For ease of reference, the NPPF tests of soundness (as set out at paragraph 35) are set out below. Plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

4. Heritage Impact Assessment

- 4.1 The site allocations 'screened in' at Section 1 have been assessed using Historic England's site selection methodology. The results of this assessment are reported below.

TEW3 - Spring Gardens, Tewkesbury

Which heritage assets are affected by the potential site allocation?

- 4.2 A small area to the south-east of the site is located in Tewkesbury's Conservation Area, with the remainder being immediately adjacent to it. A Grade II Listed Building (Sheep Market Office - 1207491) is located immediately to the north of the site abutting its boundary, and there is a Grade II Listed Building (Church of Holy Trinity - 1201291) immediately to its south and abutting its boundary. There are numerous other Listed Buildings within the vicinity of the site, with a significant concentration along High Street.

What contribution does the site (in its current form) make to the significance of the heritage asset(s)?

- 4.3 At present, the majority of the site is used as a public car park. A large area to the south of the site was formerly occupied by 'Cascades' leisure centre. This has now been demolished and the land is derelict. An outdoor market is held on part of the site twice weekly. A public toilet block is located on the site frontage to Oldbury Road. It is not considered that the site in its current form makes any particular contribution to the character and appearance of the Conservation Area and the setting of the nearby Listed Buildings. The street trees along Oldbury Road are perhaps an exception to this and it is considered that their contribution is positive. There is no intervisibility between the site and the Listed Buildings along High Street.

What impact might the allocation have on that significance?

- 4.4 The site's allocation in the TBP will potentially have a positive impact on the significance of the identified heritage assets. The site occupies a prominent position within the town and, through good design and landscaping, its redevelopment will enhance the character and appearance of the area. The site's redevelopment may also act as a catalyst for the redevelopment of other sites in the area including the Bishops Walk shopping precinct (which provides the main pedestrian connection between the site and High Street) and is considered to currently detract from the Conservation Area and the setting of multiple Listed Buildings along High Street.

How can enhancements be maximised and harm avoided?

- 4.5 Policy TEW3 expects proposals to be in conformity with the relevant development principles and parameters set out in the Tewkesbury Town Regeneration Supplementary Planning Document (TTRSPD). This includes the following principles and parameters which are considered to be relevant to the conservation of the historic environment:

Conservation - Preservation and enhancement of Tewkesbury's unique built and natural heritage is a priority. Architecture and layout should respond to the historic context

Design - Location, height, massing and materials of new buildings should respond to the character and context of the site. Design should be of a high quality, ensuring a development which creates a strong sense of place. Larger non residential footprints such as supermarkets should be wrapped with active development.

Public art - Artwork should be incorporated into the public realm, to give a sense of place and character. It can also aid legibility. Proposals should identify suitable locations for public art. Provision should be made for the maintenance of the art.

Landscaping - Tree planting and soft landscaping should be provided. Tree size and maturity should be appropriate to the location. Long term maintenance and management of landscape elements needs to be demonstrated through a management and maintenance plan.

- 4.6 It is considered that Policy TEW3 and the TTRSPD will ensure that harm is avoided and enhancements maximised.

Is the proposed site allocation appropriate in light of the NPPF's tests of soundness?

- 4.7 The allocation is considered to be consistent with the NPPF tests of soundness. It will help the Council meet its identified need for housing on a brownfield site within a sustainable location. It will contribute to the vitality and viability of the town centre and enable the conservation and enhancement of designated heritage assets. It is considered to represent sustainable development within the context of the NPPF.

TEW4 - Healings Mill, Tewkesbury

Which heritage assets are affected by the potential site allocation?

- 4.8 The principal buildings on the site (Healings Flour Mill and Warehouses) are Grade II Listed (1461284). The bridge connecting the site with Back of Avon/Quay Street is also Grade II Listed (1201293). There are numerous other Listed Buildings within the immediate and wider vicinity of the site.

Within the immediate vicinity (and within its setting) there are three Grade II Listed Buildings: Healings Warehouse (1201175), 2 Quay Street (1207516) and 2 Back of Avon (1204629). The Grade I Listed Tewkesbury Abbey (1201159) is also visible in distant views from the site. The site is within Tewkesbury's Conservation Area.

What contribution does the site (in its current form) make to the significance of the heritage asset(s)?

- 4.9 The site has been vacant since the closure of the mill in 2006. The historic buildings have retained their architectural and historic significance but are derelict and are at risk of further decay if this continues. There are a number of more modern utilitarian structures attached to, and within the curtilage of, the Listed Buildings which, whilst still a relic of the site's industrial past, are excluded from the listing, are of no particular historic or architectural merit and make no contribution to the significance of the asset. Furthermore, the buildings form part of a larger site comprising a number of more modern structures, an area of dilapidated hardstanding and the footprint of a number of previous buildings that have since been demolished. It is considered that this part of the site's setting detracts from its significance. The buildings are also part of a group which includes the listed bridge and the derelict Healings Warehouse (1201175).

What impact might the allocation have on that significance?

- 4.10 In order to secure the conservation of the heritage assets on site it is essential that they are brought into viable use. The site is complex and is subject to numerous other constraints including a high level of flood risk. Its allocation within the plan promotes the site as an opportunity and makes it clear that the Council is supportive of its sensitive redevelopment. It is anticipated that this will facilitate the conservation of the designated heritage assets thus securing their significance. The site's redevelopment would also better reveal the significance of the Listed Buildings through the demolition of the more recent additions, and involve environmental enhancements to their setting through the landscaping and general tidying up of the site. The allocation may also act as a catalyst for the conversion of the other assets forming part of the group. Planning permission has been granted for the change of use of Healings Warehouse (1201175) from offices to use classes A1, A3 and C3 (ref. 14/00568/FUL) but this was not implemented and has now lapsed.
- 4.11 It is also considered that the regeneration of the site and its surrounding area will potentially have a positive impact on the character and appearance of the Conservation Area.

How can enhancements be maximised and harm avoided?

- 4.12 Policy TEW4 expects proposals to be in conformity with the relevant development principles and parameters set out in the Tewkesbury Town Regeneration Supplementary Planning Document (TTRSPD). This includes the following principles and parameters which are considered to be relevant to the conservation of the historic environment:

Historic context - High quality architectural design must respect the historic context. The retention of the listed part of the mill is essential to the success of any scheme. Conversion must retain the character and appearance of the original building. Existing openings should be used for windows and doors. Where additional floors are introduced, they should not cut across tall windows.

Design - Location, height, mass and materials of new buildings should allow the original brick buildings on the site to remain visually dominant. Tall development may be appropriate here in keeping with the scale of the existing mill buildings.

Public realm - The treatment of the river frontage will be essential to the success of this scheme. Enough space should be given fronting the river to allow for an attractive public space and where possible to allow access down to the water. The area known as the hangings should be included within any improvement scheme.

Form - New development should respond to the grain of the existing settlement. Taking cues from block sizes. Patterns of plot subdivision and relationship between built and non-built space.

- 4.13 In addition to this, Policy TEW4 requires that proposals on the site prioritise the conservation of the heritage assets on site as part of the redevelopment.
- 4.14 It is considered that Policy TEW4 and the TTRSPD will ensure that harm is avoided and enhancements maximised.
- 4.15 It should also be noted that Tewkesbury has been successful in a bid to Historic England to become a High Street Heritage Action Zone. As part of this initiative, match funding will be available to stimulate investment, regeneration and conservation of the Healings Mill site. This will be achieved through the commissioning of relevant studies to quantify constraints (such as flooding, ecology, structural condition) and to identify opportunities which will inform future detailed regeneration proposals.

Is the proposed site allocation appropriate in light of the NPPF's tests of soundness?

- 4.16 The allocation is considered to be consistent with the NPPF tests of soundness. It will help the Council meet its identified need for housing on a brownfield site within a sustainable location. It will contribute to the vitality and viability of the town centre and enable the conservation and enhancement of designated heritage assets. It is considered to represent sustainable development within the context of the NPPF.

SHU1 - Land at corner of Badgeworth Lane and A46, Shurdington

Which heritage assets are affected by the potential site allocation?

- 4.17 The site is within the setting of the Lodge to Greenway Hotel - a Grade II Listed Building (1340145) located on the opposite side of the A46

What contribution does the site (in its current form) make to the significance of the heritage asset(s)?

- 4.18 The Lodge is located on a busy road forming the approach to Shurdington from the south. It is a small, single storey building and is set back from the road frontage. It is flanked by an established Leylandii hedge abutting the road frontage to the south, and a row of mature cherry trees abutting the road frontage to the north. Due to this, the lodge has a fairly discreet presence in the street scene and is not a dominant feature of the area. The site itself is also set back from the road behind a wide green verge and a number of established trees. These are considered to have a buffering effect on views into the site from the road. Due to this arrangement, intervisibility between the site and the designated heritage asset is limited to the area immediately surrounding the crossroads of Shurdington Road/Badgeworth Lane/Greenway Lane. Moreover, the area surrounding the lodge is predominately comprised of 20th century residential development of a suburban character in addition to various commercial uses. The area has a semi urban/edge of settlement character. Although the site itself involves undeveloped agricultural land, this is not a characteristic feature of the setting of the lodge. Due to the contextual situation described above, it is not considered that the site makes any particular contribution to the setting of this Listed Building.

What impact might the allocation have on that significance?

- 4.19 Subject to appropriate design, layout and landscaping it is considered that any harm caused to the setting of the lodge would be negligible.

How can enhancements be maximised and harm avoided?

- 4.20 It is not considered that the development of the site needs to be guided by any site specific development principles aimed at protecting the setting of the lodge. The more general design/historic environment policies within the development plan, namely policies SD4 and SD8 of the Joint Core Strategy and policies RES5 and HER2 of the Tewkesbury Borough Plan. will be sufficient to ensure that the setting of the lodge is not harmed through poor design and inadequate landscaping.

Is the proposed site allocation appropriate in light of the NPPF's tests of soundness?

- 4.21 The allocation is considered to be consistent with the NPPF tests of soundness. It will help the Council meet its identified need for housing in a location identified for low levels of development within the JCS spatial strategy and without significant impacts. It is considered to represent sustainable development within the context of the NPPF.

FOR1 - Land at corner of Bishops Walk and School Lane, Forthampton

Which heritage assets are affected by the potential site allocation?

- 4.22 The eastern part of the site containing a farm building complex (Vine Farm) is located within the Forthampton Conservation Area. The remainder of the site abuts the Conservation Area to its northern and western boundaries. Forthampton is heritage rich and there are numerous Listed Buildings and non-designated heritage assets located around the village. The nearest Listed Buildings are located within Vine Farm (Vine Farmhouse (1153890) and its associated barn/store (1340281)), along School Lane (Sanctuary Cottage (1153895) and The Sanctuary (1091436)) and within Corner Farm located on the opposite side of Bishops Walk (1091434, 1091433, 1153868, 1153878). The non-designated heritage assets within the immediate vicinity of the site are the thatched roof cart shed located in the green to the north of site at the junction of Bishops Walk/School Lane, and the part timber framed barn located to the south of the site within the curtilage of Sanctuary Cottage.

What contribution does the site (in its current form) make to the significance of the heritage asset(s)?

- 4.23 The Forthampton Conservation Area Character Statement¹ was published in 2004 and identifies the special architectural and historic interest, character and appearance of Forthampton. This does not make any specific reference to the site itself but does identify the features surrounding the site as making an important contribution to the Conservation Area. These include the green spaces around the crossroads (located immediately

¹ <https://www.tewkesbury.gov.uk/heritage>

to the north of the site), the cart shed within the green, and Corner Farm and Vine Farm which make a prominent contribution to the character of the place. It also acknowledges the village's dispersed, low density development pattern and the presence of grass verges around and between buildings as factors contributing to its special interest.

- 4.24 The site occupies a fairly prominent position in the village due to its location at the junction of Bishops Walk/School Lane, although this is reduced to some extent by the green area and mature roadside tree planting. The site also provides a backdrop to the green space and the cart shed located within it, and these are identified as making an important contribution to the character of the area. The site provides a sense of openness to the village and contributes to its dispersed rural character which is an identified characteristic of the Conservation Area. On this basis it is considered that the site in its current form makes a positive contribution to the character and appearance of the Conservation Area.
- 4.25 There is some intervisibility between the site and the nearby Listed Buildings identified above (see comments below). Although it is not considered that the site makes a significant contribution to their setting, its current openness is still considered to make some contribution.

What impact might the allocation have on that significance?

- 4.26 It is considered that new development on the site could potentially have an overt presence within the village and reduce the contribution made by its openness to the village's dispersed, low density development pattern. The allocation therefore has the potential to detract from the character and appearance of the Conservation Area.
- 4.27 There is potential intervisibility between the site and the nearby Listed Buildings identified above. The site and the Listed Buildings within Corner Farm can be seen together in views from the crossroads of Bishops Walk/School Lane. The western part of the site can be seen in views looking north up School Lane from Sanctuary Cottage and The Sanctuary, and there is potential intervisibility between the site and the rear of these assets. There is potential intervisibility between the site and the listed buildings in Vine Farm. The site includes the modern farm buildings at Vine Farm which are located within close proximity of the Listed Buildings. Any new development on the footprint of the farm buildings would be clearly visible from the adjacent listed buildings and vice versa. The western part of the site is elevated above the area in which the Listed Buildings are located and could potentially be visible from them, although the existing modern farm buildings may limit views if they are to be retained. Whilst intervisibility between any new development and the identified Listed Buildings is not necessarily an issue per se, the proposal could result in harm to the setting of the Listed Buildings through inappropriate design, layout and landscaping.
- 4.28 Notwithstanding the above, it is considered that there may be a number of opportunity areas within the site in which some limited new development could potentially take place without causing unacceptable harm to the historic environment. The site area, at 1.55ha, is very large in

relation to the indicative capacity of 10 dwellings and this has been deliberately done so that suitable area(s) can be explored through a planning application or request for pre-application advice. Moreover, assuming a development density of 20-30 dwellings per hectare (commensurate with the site's rural location), this would only use a relatively small proportion of the site area meaning that the remainder would remain open and thus maintaining its contribution to the Conservation Area and setting of nearby Listed Buildings.

How can enhancements be maximised and harm avoided?

- 4.29 Policy FOR1 relates specifically to the site and provides that in assessing proposals careful consideration will be given to the design and siting of the development and its effect on the character of the settlement, its historic environment and its rural landscape setting. The Council proposes to reinforce this policy further by requiring that proposals have regard to the design guidance within the Forthampton Conservation Area Character Statement (Tewkesbury Borough Council, 2004). A modification to this effect has been proposed as part of the plan's submission for examination.
- 4.30 It is considered that Policy FOR1 will ensure that harm is avoided and enhancements maximised.

Is the proposed site allocation appropriate in light of the NPPF's tests of soundness?

- 4.31 The allocation is considered to be consistent with the NPPF tests of soundness. It will help meet community aspirations to enable a small amount of new housing within the village to support its vitality. It is considered to represent sustainable development within the context of the NPPF.

5. Conclusion

- 5.1 This assessment finds that the proposed housing allocations at Tewkesbury town (TEW3 (Spring Gardens) and TEW4 (Healings Mill)) will potentially have a positive impact on the historic environment by enabling the regeneration of brownfield land and bringing disused heritage assets into viable use. The policies within the Tewkesbury Borough Plan and guidance within the TTRSPD will ensure that enhancements and maximised and harm avoided. Funding received through the HSZAZ will help to enable the sensitive redevelopment of Healings Mill.
- 5.2 The assessment finds that, subject to policies within the Tewkesbury Borough Plan and the Joint Core Strategy, housing site allocation SHU1 would have a negligible impact on the historic environment.

- 5.3 Finally, whilst the proposed housing site allocation at Forthampton (FOR1) could potentially result in harmful impacts to the historic environment, site specific policy FOR1 will ensure that any such harm will be avoided.
- 5.4 Overall, it can be concluded that the proposed housing site allocations within the Tewkesbury Borough Plan are capable of being developed without causing unacceptable adverse impacts on the historic environment whilst realising opportunities for the enhancement of the historic environment.