



Heritage Strategy

Planning Policy
Tewkesbury Borough Council
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1. Introduction to the strategy

Purpose of the Heritage Strategy

- 1.1 This heritage strategy will play a major role in the shaping of the Borough's development and identity. It is intended that the strategy provides a strategic and clear approach to dealing with Tewkesbury's heritage.
- 1.2 The document contains recommendations to ensure that any future policies and approaches to the Borough's heritage are based on a clear understanding of the place, its significance and its value. The aim of the Tewkesbury Borough Heritage Strategy is therefore to enable Tewkesbury Borough Council to achieve their objectives for the protection and enhancement of the historic environment as set out in the Joint Core Strategy and the emerging Tewkesbury Borough Plan.

Planning Context

- 1.3 Planning shapes the places where people live and work and the country we live in. It plays a key role in supporting the Government's wider social, environmental and economic objectives and for sustainable communities.

National Planning Policy Context

- 1.4 The Government's planning policy is set out in a single unified document known as the National Planning Policy Framework (NPPF).
- 1.5 The NPPF details the Government's view of what achieving sustainable development means. It states that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive. The objectives are economic, social and environmental. A component of the environmental objective is to protect and enhance the historic environment.
- 1.6 Section 16 of the NPPF, 'Conserving and enhancing the historic environment' sets out the Government's specific policies relating to heritage assets and the historic environment. The NPPF states that heritage assets are an irreplaceable resources and should be conserved in a manner appropriate to their significance. It sets out that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment and provides guidance on the designation of conservation areas, the maintenance of a historic environment record and the importance of an evidence base. Furthermore, it provides guidance on the determination of planning applications which impact upon heritage assets, balancing the significance of the asset, the potential resulting harm to it, and the wider benefits of a development.
- 1.7 The policies set out in the NPPF are a material consideration that must be taken into account in development management decisions.

Local Planning Policy Context

- 1.8 For Tewkesbury, the local plan consists of the adopted Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, the Tewkesbury Borough Plan (emerging) and any neighbourhood plans.
- 1.9 The Joint Core Strategy (JCS) was adopted in December 2017 and provides the strategic planning document for the area, setting out the level of growth and the high level strategy for delivering it, over the plan period from 2011-2031. A key objective in the JCS is ‘securing the conservation, enhancement, improvement and enjoyment of the historic environment’. The JCS also contains Policy SD8 ‘Historic Environment’ which provides the strategic level policy regarding heritage assets and states that the built, natural and cultural heritage of the area will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy.
- 1.10 Tewkesbury Borough is also preparing a new Tewkesbury Borough Plan (TBP) which, at the time of writing, was at Regulation 19 stage and due to be submitted for examination with adoption expected in late 2020. The TBP sits underneath the JCS to provide the more detailed and locally specific policies relevant to the Borough. The emerging TBP provides a suite of policies relating to the historic environment under the ‘Quality Places’ section. This includes:
- HER1 ‘Conservation Areas’
 - HER2 ‘Listed Buildings’
 - HER3 ‘Historic Parks and Gardens’
 - HER4 ‘Archaeological Sites and Scheduled Monuments’
 - HER5 ‘Locally Important Heritage Assets’
 - HER6 ‘Tewkesbury (1471) Historic Battlefield’
- 1.11 There are also a number of Neighbourhood Development Plans that have been ‘made’ within the Borough. NDPs may also contain policies relating to the historic environment specifically relevant to the neighbourhood area that the plan covers.

Other Material Planning Documents

- 1.12 The Cotswolds AONB Conservation Board has a statutory duty to prepare a Cotswolds AONB Management Plan and the latest plan was adopted by the Board in December 2018. Although not a statutory part of Tewkesbury’s local plan, it does form a material planning consideration. The Management Plan includes a policy on the historic environment and cultural heritage.
- 1.13 Conservation Area Appraisals are in place for some of Tewkesbury’s conservation areas. These appraisals describe the elements which together define the area’s special architectural or historic interest. These can also be a material planning consideration.
- 1.14 A Tewkesbury Town Centre Regeneration SPD was adopted by the Council in April 2019. The SPD provides an analysis of the constraints and opportunities within the town centre and identifies key design principles for all new development opportunities. The SPD also sets out some of the specific regeneration opportunities in the town, including Spring Gardens and

Healings Mill. It is intended for the SPD to be used as a planning tool to guide redevelopment and regeneration within the town and wider area. It will also help to promote economic investment and vitality within the opportunity sites identified and promote the town as a great place to invest.

- 1.15 The Borough Council are also progressing a Shop Front Guide SPD which will be adopted in 2020 in order to enhance and protect the quality of town/village centres, many of which have conservation areas. This will also help to inform a series of proposed shopfront improvement proposed as part of the High Street Heritage Action Zone initiative.

Tewkesbury High Street Heritage Action Zone

- 1.16 The Borough Council were successful in their bid to Historic England for the inclusion of Tewkesbury town within the High Street Heritage Action Zone (HSHAZ) scheme, a nationwide initiative designed to secure lasting improvements to historic high streets. The project programme lasts for four years (2020-2024) and consists of a number of grant funded initiatives to develop and implement physical changes in the high street and to strategic heritage buildings. The Borough Council has been awarded just under £1.5m funding as part of this scheme which be match funded.
- 1.17 The HSHAZ programme includes three strands: physical interventions, cultural programme and community engagement. The Council will be setting up a 'Cultural Consortium' consisting of community groups to initiate a number of cultural based activities, taking place across the four years, focused on the promotion of the high street. The physical interventions include:
- Facilitation the redevelopment of Healings Mill
 - Improvements to the public realm within the High Street and Quay Street
 - A grant scheme for shopfront and façade improvements
- 1.18 Engagement with community groups and stakeholders will be undertaken in regard to all of these initiatives.

2 Tewkesbury's Rich Heritage

- 2.1 Tewkesbury Borough is a diverse borough across both urban and rural areas. The landscape is characterised by the Area of Outstanding Natural Beauty (AONB) to the eastern side of the borough and the Severn Vale to the west of the borough. Much of the rest of the borough is made up of rural settlements in the countryside.
- 2.2 There are many different types of heritage assets and designations. Some heritage assets are so significant that they justify designation. Heritage assets can not only have a heritage value but also an economic value that will, in line with the vision of the JCS, create 'a borough of healthy, strong, thriving and sustainable communities, both rural and urban , where people want to live, work and visit.' The tourism generated from heritage assets, heritage and the property market houses within a conservation area generally have a higher selling price. A

listed property can generate a higher level of total return on investment (Heritage Counts 2017 Heritage and the Economy South West published 21 September 2017, <https://content.historicengland.org.uk/content/heritage-counts/pub/2017/south-west-heritage-economy-2017>)

- 2.3 The Visit Tewkesbury website provides a helpful source of information regarding heritage and historic assets within the Borough: <http://www.visittewkesbury.info/things-to-do/heritage/>
- 2.4 Tewkesbury Borough has 44 Scheduled Monuments – these are listed at Appendix 2. A Scheduled Monument is one that has been designated by the Secretary of State for Digital, Culture, Media and Sport because of its national significance. The legislative basis for this designation comes from the Ancient Monuments and Archaeological Areas Act of 1979.
- 2.5 Tewkesbury Borough has some 1,577 listed buildings. There are different categories of listed buildings. These buildings are separated into Grade I, Grade II* and Grade II. <https://historicengland.org.uk/listing/the-list/>
- 2.6 There are 14 Conservation areas in the borough of which 4 have conservation area appraisals - these are listed at Appendix 3.
- 2.7 Tewkesbury Borough has 6 Historic Park and gardens – these are listed at Appendix 4. These are parks and gardens are registered by Historic England established in 1983. These sites are registered due to their designed landscapes rather than their planting or botanical importance.
- 2.8 Non- designated heritage assets are those that have not been designated but are still of historic significance and make a contribution to the historic environment of the borough. Non-designated heritage assets may include archaeological features in addition to buildings and other structures. Some non-designated assets may be subject to local heritage listing. Non-designated heritage assets have no statutory basis but, are still a material consideration in the determination of planning applications.
- 2.9 Tewkesbury borough has one Registered Battlefield within Tewkesbury Town which was the site of the battle of Tewkesbury (1471).
- 2.10 Other heritage assets may also be subject to statutory protection. In Tewkesbury Borough the Cotswold AONB is subject to protection under the Countryside and Rights of Way Act 2000.
- 2.11 The Gloucestershire Historic Environment Record (HER) forms a significant part of the evidence base. The HER collates information on archaeology and the historic built environment across the county.
- 2.12 Historic Landscape Character Assessments are available from the Archaeology Data Service.

- 2.13 Landscape Character Assessments (LCA); Tewkesbury Borough falls with NCA 106 Severn and Avon Vales. This document was published by Natural England.
- 2.14 Heritage at Risk across the borough includes 18 sites including a conservation area, scheduled ancient monuments and listed buildings. The condition of these sites varies from Fair to extensive significant problems. <https://www.historicengland.org.uk/advice/heritage-at-risk/search-register/results/?advsearch=1&Lpa=Tewkesbury&searchtype=harsearch&page=2>

3 Summary of Key Issues and Challenges

- 3.1 The current issues and challenges affecting heritage and the delivery of heritage services in Tewkesbury Borough are identified through a SWOT (strengths, weaknesses, opportunities, threats) analysis below.

STRENGTHS

1. The riverside and the town's industrial heritage i.e. Healings Mill.
2. The Cotswolds AONB – natural heritage. Strong relationship in Borough between the historic and natural environment (i.e. Winchcombe and the Cotswold villages in east of Borough).
3. Borough has a vibrant economy and is a desirable place to live. This is keeping historic assets in viable use, but is also a threat.
4. Heritage rich Borough with a significant range of historic assets including Tewkesbury Abbey, Grade I, II* and II Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, Historic Battlefield (Battle of Tewkesbury), in addition to numerous non-designated heritage assets (buildings and archaeological remains).
5. Registered site of the Battle of Tewkesbury and Tewkesbury Abbey are key tourism assets that contribute significantly to local distinctiveness – they put Tewkesbury on the map.

WEAKNESSES

1. There is a lack of up to date conservation area appraisals.
2. There is a lack of Article 4 direction at Snowhill.
3. Revision of Snowhill conservation boundary is needed.
4. Absence of up to date detailed policies on historic environment.
5. Local list of non-designated heritage assets and associated policy seeking their protection.
6. Conservation Areas – Article 4 directions are outdated (they do not relate to up to date permitted development order), are unjustifiable in places (they do not correspond to revised boundaries) and are not comprehensive (i.e. Snowhill does not have an Article 4 direction).
7. Buildings at risk register is not up to date.
8. Unknown heritage assets (buildings and archaeological). Council is preparing local list but there may be difficulty accessing some buildings (i.e. historic farm buildings in isolated positions).
9. Lack of public engagement/participation in planning for the conservation of the historic environment (i.e. civic societies, local interest groups).
10. Council resources limit ability to be proactive in the gathering of information on historic environment (i.e. local list, CA appraisals, buildings at risk register) and keep mechanisms up to date (i.e. Article 4 directions).

11. Areas of unattractive public realm with lack of linkages between key heritage assets i.e. between the High Street and the riverside and the Abbey.
12. Lack of management plans for Tewkesbury Abbey and Tewkesbury 1471 Battlefield

OPPORTUNITIES

1. To undertake up to date conservation area appraisals.
2. The Tewkesbury Borough Plan provides an opportunity to provide an up to date suite of policies relating to the historic environment underpinned by a heritage strategy. Opportunity to produce a policy for the conservation of non-designated heritage assets and associated local list.
3. Promote heritage tourism – bring buildings into viable uses, raise awareness and participation in the conservation of the historic environment.
4. Town Centre regeneration/Area Action Plan – facilitate redevelopment of key historic sites (i.e. Healings Mill), enhance Conservation Area, improve town’s retail/entertainment offer and increase enjoyment of its historic environment .
5. Healings Mill site – an opportunity to conserve and enhance the historic environment, enable restoration and viable use of non-designated heritage assets, enhance site’s contribution to Conservation Area, setting of LBs and setting of Conservation Area.
6. TBP provides opportunity to engage with local groups and other stakeholders via consultations.
7. Bring Buildings at Risk Register up to date. Try and reduce the number of buildings on the list.
8. Engage and build closer links with building preservation trusts (in pursuance of the above)
9. Tewkesbury Town High Street Heritage Action Zone programme to deliver projects that improve the historic high street.

THREATS

1. Significant areas of the Borough (including Tewkesbury Town Centre) are at risk of flooding.
2. Viability – keeping buildings in viable uses that are prone to redundancy and are difficult to re-use. Conservation of some heritage assets may present viability issues due to the cost of repair/remediation).
3. Permitted development – LPA lacks control over certain developments which may have an effect on designated heritage assets and CAs lacking an Article 4 direction.
4. Development pressure – area has a high level of housing need and is part of JCS. The amount and distribution of development risks changing the character and setting of settlements.
5. Harm to non-designated heritage assets (particularly demolition and replacement of period dwellings).
6. Traditional shop fronts are vulnerable to unsympathetic alterations including signage.
7. A shortage of skills with traditional construction techniques and materials.

4. Vision and Objectives

Vision for the Strategy

- 4.1. The vision for the strategy is to understand the historic environment, to create a cohesive approach to the historic environment across the council and to take a proactive approach in managing the historic environment. This strategy will seek to address the points raised through the SWOT analysis.

Objective One: To understand the historic environment

- 4.2. To be aware of all sources of information regarding the historic environment across the borough in order to better understand the value of the heritage assets.
- 4.3. To maintain an up to date data set of heritage assets.
- 4.4. To understand the contribution that heritage can make to the economic growth of the Borough and gather relevant statistics where appropriate.
- 4.5. To actively gather information on designated and non-designated heritage assets; including publishing a local list.

Objective Two: To create a cohesive approach to the historic environment across the council

- 4.6. Implement a programme of conservation area appraisals.
- 4.7. Ensure the historic environment is considered at all stages of the planning process through plan making to development management decision making.
- 4.8. Identify the current priorities within the development services area in regards to the historic environment.
- 4.9. Development management – ensuring that the historic environment is fully considered through the planning application process.
- 4.10. Planning policy – the policies in the emerging borough plan will seek to protect and enhance the historic environment.
- 4.11. Community development – supporting local communities to ensure that they consider the historic environment when creating neighbourhood and parish plans and support local heritage bodies.

Objective Three: To take a proactive approach in managing the historic environment

- 4.12. Implement regeneration projects in Tewkesbury through the Heritage Action Zone programme.
- 4.13. Review, prepare and adopt conservation area appraisals for the 14 conservation areas in the borough.

4.14. Adopt guidance on selection criteria for non-designated heritage assets for inclusion onto the local list.

4.15. To monitor buildings at risk list in line with the heritage strategy.

5. Action Plan

5.1. Some actions in this plan are rightly aspirational and decisions will be required in the future regarding funding and resources; however it is important that these actions are required and kept under review.

	Action	Target	Progress
1	Tewkesbury High Street Heritage Action Zone Utilise funding to implement a programme of projects in the town that contribute towards regeneration and enhancement of historic environment.	2024	Heritage Action Zone bid confirmed successful in April 2020. Project to be implemented between 2020-2024.
2	Shopfront Design Guide SPD Adopt the SPD to provide guidance on shopfronts to ensure they contribute to a quality urban and historic environment.	Summer 2020	
3	Tewkesbury Borough Plan – Historic Environment Policies Adopt the Borough Plan which provides detailed policies around heritage assets and new development.	Winter 2020	The Borough Plan was submitted to the Government in May 2020. Adoption is anticipated in Winter 2020.
4	JCS Review – Historic Environment Policies Review the strategic policy approach to the historic environment to ensure that it is still up to date with national guidance/policy and fit for purpose.	Winter 2022	Issues & Options JCS was consulted on in early 2019. A Preferred Options draft JCS will be published for consultation in Summer 2020.
5	Local List Establish and publish a local list of non-designated heritage assets in the Borough.	Summer 2021	
6	Heritage at Risk Register Keep the register, including buildings and conservation areas at risk, as up to date as necessary and identify any specific actions to address risks.	Ongoing	

7	Conservation Area Appraisals Ongoing work to review existing appraisals where necessary and establish new appraisals where they don't currently exist.	Ongoing	Stanton Conservation area was reviewed and adopted by the Borough Council in 2019.
8	Article 4 Directions Review existing extent and content of Article 4 Directions.	Ongoing	
9	Tewkesbury (1471) Battlefield Management Plan	Ongoing	

Appendix 1: Where to find other information on the Historic Environment

Historic Environment Information

The National Heritage List for England

<https://www.historicengland.org.uk/listing/the-list/>

Heritage Gateway

<http://www.heritagegateway.org.uk/gateway/>

Guidance & Principles

National Heritage Protection Plan – Historic England

<https://www.historicengland.org.uk/images-books/publications/nhpp-plan-framework/>

Heritage Lottery Fund Guidance Notes & Documents – Heritage Lottery Fund

<http://www.hlf.org.uk/aboutus/Pages/allourpublications.aspx>

Good Practice Guide for Local Heritage Listing – Historic England

<https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

Understanding Place: Historic Area Assessments – Historic England

<https://www.historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>

Heritage and Sustainable Growth – Historic England

<https://www.historicengland.org.uk/advice/planning/heritage-and-growth/>

Heritage Works: a toolkit of best practice in heritage regeneration RICS, BPF & Historic England

<https://www.historicengland.org.uk/images-books/publications/heritage-works/>

Affordable Rural Housing and the Historic Environment – English Heritage

<http://www.helm.org.uk/upload/pdf/ARH3.pdf?1337937273>

Knowing Your Place: Heritage and Community-Led Planning in the Countryside – English

Heritage and ACRE

<https://www.historicengland.org.uk/images-books/publications/knowning-your-place/>

Understanding Historic Buildings: A guide to good recording practice – Historic England

<https://www.historicengland.org.uk/images-books/publications/understanding-historic-buildings/>

**The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3
(Second Edition) - Historic England**

<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets.pdf/>

Appendix 2: Scheduled Monuments

- Site of St. Mary's Abbey, List UID: 1009317
- Holm Castle, List UID:1002100
- Margaret's Camp, moated site and associated remains, List UID: 1018449
- Deserted medieval village, List UID: 1002071
- Deerhurst monastic site and multi-period settlement, List UID: 1018632
- The Knolls camp, List UID: 1004873
- Dixton Hill Camp, List UID: 1004874
- Nottingham Hill camp, List UID: 1004864
- Camp on Langley Hill, List UID: 1002086
- Romano – British Villa, List UID: 1021449
- Milhampost Roman Site, List UID: 1004844
- Hailes Abbey, List UID: 1018070
- Winchcombe Abbey, List UID: 1019146
- The Ring, Cleeve Hill, Brockhampton, List UID: 1004845
- Earthwork on Cleeve Common, List UID: 1002084
- Tithe Barn 60 metres South of Postlip Hall, List UID: 1091478
- Cleeve Hill camp near Cheltenham, List UID: 1002132
- Moat House moated site, List UID: 1016835
- Over earthwork, List UID: 1002092
- Over Bridge, List UID: 1015873
- Moat and fishpond at Bentham Manor, List UID: 1016764
- Moated site and fishpond at Urrist Barn, List UID: 1017039
- Wadfield Roman Villa, List UID: 1004846
- Belas Knap long barrow 600m ESE of Hill Barn Farm, List UID: 1008199
- Bowl barrow 100m south west of Belas Knap, List UID: 1009158
- Spoonley Wood Roman Villa, List UID: 1004847
- Camp S of Bespidge Wood near Sudeley, List UID: 1004838
- Bowl barrow 690m southwest of Roel Farm, List UID: 1017076
- Medieval and later settlement remains and associated fields at Hawling, List UID: 1405912
- Two bowl barrows 740 m south west of Southdown Farm, List UID: 1017038
- Two bowl barrows known as Hawling Downs round barrows, 610m north east of Slade Barn Farm, List UID: 1017037
- Dryhill Roman Villa, List UID: 1004848
- Crickley Hill camp, List UID: 1003586

- High Brotheridge camp, Buckholt, List UID: 1002116
- Great Witcombe Romano-British Villa, List UID: 1014826
- Churchyard cross in St. Michael's Churchyard, List UID: 1015316
- Gretton Church
- Nottingham Hill Camp
- Churchyard cross in St.Giles Churchyard Maisemore, List UID: 1015390
- Shenbarrow Hill Camp
- Taddington Medieval settlement
- Cross in churchyard of St.John the Baptist's Church Tredington List UID: 1154046
- Towbury Hill Camp

Appendix 3: Conservation Areas

- Ashleworth Green Conservation Area was designated in June 2001.
- Bishop's Cleeve designated in April 1979. The Bishop's Cleeve Conservation Area Appraisal was published in May 2011.
- Buckland Conservation Area was designated in October 1977 and also has an Article 4 direction.
- Dumbleton Conservation Area was designated in November 2001.
- Forthampton Conservation Area was designated in November 2003 and has a Character Statement published in February 2004.
- Great Washbourne was designated on November 2001 and a Conservation Area Character Statement was published in May 2002.
- Gretton Conservation Area was designated in September 1975.
- Laverton Conservation Area was designated in October 1977 and also has an Article 4 direction.
- Snowhill Conservation Area was designated by Gloucestershire County Council in 1971. A Conservation Area Appraisal was carried out in 2011.
- Stanton Conservation Area was designated in June 1971 and also has an Article 4 direction.
- Tewkesbury Conservation Area was designated by Gloucestershire County Council in 1969 which was amended in 1987. A Conservation Area Appraisal was undertaken in 2010. The historic town centre also has an Article 4 direction.
- Twyning Church End Conservation Area was designated by Tewkesbury Borough Council in September 2002.
- Winchcombe Conservation Area was designated by Gloucestershire County Council in March 1971 and an Article 4 direction was confirmed in April 1987.
- Woodmancote Conservation Area was designated by Tewkesbury Borough Council in April 1979.

Appendix 4: Historic Parks & Gardens

- Tewkesbury Cemetery, Grade II, List UID: 1001711
- Toddington Manor, Grade II, List UID: 1000785
- Stanway House, Grade I, List UID: 1000480
- Snowhill Manor, Grade I, List UID: 1000781
- Sudeley Castle, Grade II*, List UID: 1000784
- Highnam Court, Grade II*, List UID:1000140