

**Appendix 2**

**Tewkesbury Borough Council**

**Heritage Strategy**

**Consultation Statement**

**March 2022**



**Tewkesbury**  
Borough Council

## **1. Purpose and Background**

- 1.1. This statement sets out details of the consultation that has taken place which has informed the development and refinement of the Heritage Strategy. The statement has been produced in accordance with regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulation states that, before adoption the local planning authority must prepare a statement setting out:
  - the persons the local planning authority consulted when preparing the document;
  - a summary of the main issues raised by those persons; and
  - how those issues have been addressed in the document.
- 1.2. The Council has prepared its own Statement of Community Involvement (SCI) (2013) to show how it will involve the community in its plan and policy making process. This can be viewed on the Council's web site at <https://www.tewkesbury.gov.uk/local-plan>.
- 1.3. The purpose of the Heritage Strategy is to provide an evaluation of the Borough's assets and set out the Council's intentions for managing appropriate change within the historic environment, whilst conserving and enhancing the Borough's Heritage Assets so that they can be enjoyed by both present and future generations to come. This document further 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 Heritage Strategy therefore enables Tewkesbury Borough Council to achieve its objectives for the protection and enhancement of the historic environment as set out in the Joint Core Strategy and the emerging Tewkesbury Borough Plan.

## **2. Consultation Process**

- 2.1. A period of formal public consultation was undertaken on a draft Strategy for a 6 week period from Friday 17<sup>th</sup> September 2021 until Friday 29<sup>th</sup> October 2021.
- 2.2. Over 165 organisations and individuals were written to inform them of consultation and invite comments on the draft Heritage Strategy. Contacts were taken from the existing Tewkesbury Borough Plan consultation database as those who have been involved in, or have an interest in, the plan making process in Tewkesbury. This includes all Parish Councils in the Borough, neighbouring local authorities, Gloucestershire County Council, as well as the following statutory consultees:
  - Environment Agency
  - Lead Local Flood Authority
  - Historic England
  - Sport England
  - Marine Management Organisation
  - Thames Water

- Severn Trent
- Highways England
- Network Rail

2.3. In addition to this a notice of the consultation was placed in the local press through the Gloucestershire Echo as well as advertised on the Borough Council’s website news feed.

2.4. In line with the Council’s SCI the Heritage Strategy was made available for viewing in the following ways:

- Electronically on the Tewkesbury Borough Council website (<https://www.tewkesbury.gov.uk/local-plan>)
- In hard copy at Tewkesbury Borough Council Offices, Gloucester Road, Tewkesbury
- In hard copy at Tewkesbury Borough libraries (Tewkesbury, Bishops Cleeve, Winchcombe, Churchdown, Brockworth)

### 3. Consultation Responses

3.1. A total of 11 responses were received, however 5 of these were from statutory consultees confirming they had no comments. The majority of responses were positive and welcomed the purpose of the document. Several suggestions for further development of the document were noted. These were then considered and appropriate amendments were made to the SPD.

3.2. A summary table of these issues, and the Council’s response, is provided in the table below:

Summary of Response	Response in SPD
Heritage assets which are derelict, unoccupied, isolated, hidden or decaying are at risk from criminal damage (vandalism, trespass, fire, salvage) and would benefit from protection. Once assets have been identified there is an opportunity to safeguard them in order to prevent crime. I.e. a register of historic criminal activity and security/prevention measures implemented. The SWOT analysis could include criminal risks. Incorporating established crime prevention techniques would help the future survival of the sites.	The risk of criminal damage and theft has been added to the SWOT.
Maintenance of sites will encourage visitors and enable clearance for viewing, photographs and monitoring of changes or suspicious activity.	Comments noted.

<p>More detail is needed under action listed as it is currently only 'review existing extent' especially with regard to Permitted Development Order issues.</p>	<p>More detail has been added within the Action table.</p>
<p>Appendix should include website links to Historic England advice on addressing heritage crime.</p> <p>Preventing Heritage crime  <a href="https://historicengland.org.uk/advice/caring-for-heritage/heritage-crime/prevent/">https://historicengland.org.uk/advice/caring-for-heritage/heritage-crime/prevent/</a></p> <p>Tackling Heritage Crime  <a href="https://historicengland.org.uk/advice/caring-for-heritage/heritage-crime/tackling/">https://historicengland.org.uk/advice/caring-for-heritage/heritage-crime/tackling/</a></p> <p>It would be useful if a direct link to the Gloucestershire HER at 2.10 could be included in Appendix 1:</p> <p><a href="https://www.gloucestershire.gov.uk/planning-and-environment/archaeology/request-archaeological-data-from-gloucestershires-historic-environment-record-her/">https://www.gloucestershire.gov.uk/planning-and-environment/archaeology/request-archaeological-data-from-gloucestershires-historic-environment-record-her/</a></p>	<p>The suggested links have been included.</p>
<p>There are opportunities to expand heritage tourism by including the stories/history of each asset.</p>	<p>Comments noted</p>
<p>Concerns whether public engagement and involvement are sufficiently stressed.</p>	<p>Noted.</p>
<p>Support for local heritage attractions, including museums, could be added to item 7 in the opportunities table alongside retail/entertainment. The word museum does not appear in the strategy although listed at 2.3. The clause regarding supporting local heritage bodies at 4.7 reads slightly awkwardly and possibly merits its own sentence.</p> <p>There is an ongoing issue with cash strapped museums accepting the archaeological archives produced as a result of national and local planning policy (e.g. JCS policy SD8, emerging Borough plan policy HER4). These problems</p>	<p>Agreed. These points have been added.</p> <p>Noted. This is has been added to the SWOT as requested.</p>

<p>have only been exacerbated by the covid pandemic. A sentence could be added to the threats table - 'there are issues with the storage and public accessibility of archaeological archives produced as a result of developments within the borough'.</p> <p>Tewkesbury Museum is in poor condition and an initiative in response is urgently required.</p>	<p>Specific issues such as this are not appropriate in a strategic planning document for the Borough.</p>
<p>Headline figures could emphasise the value of Tewkesbury's heritage. It attracts visitors, helps underpin the local economy; contributing to supporting social cohesion, civic pride and wellbeing.</p>	<p>This has been added to the introduction.</p>
<p>Could highlight the key heritage partners/interests/groups in the Borough, and include their roles, interest and priorities esp in relation to helping deliver the action plan e.g. Tewkesbury Town Council; Battlefield Society; Visit Tewkesbury; Friends of Tewkesbury Abbey; Historical Society; ...</p>	<p>Specific issues such as this are not appropriate in a strategic planning document for the Borough.</p>
<p>Is it clear how local distinctiveness, identity and design quality be assured?</p>	<p>Such objectives are underpinned by the NPPF and local policy.</p>
<p>The setting of Tewkesbury Abbey and its management is a long standing issue that may be worth mentioning.</p>	<p>Specific issues relating to individual buildings or establishments are not appropriate in a strategic planning document for the Borough.</p>
<p>Tewkesbury Battlefield – reference to the annual banner festival and the role of the Society could be made emphasised.</p>	<p>Specific points relating to local community initiatives are not appropriate in a strategic planning document for the Borough.</p>
<p>TBC website. The heritage web page on the TBC website could be further developed to include additional information, advice and links.</p>	<p>This is being implemented.</p>
<p>No reference in the Heritage Strategy to climate change.</p>	<p>This point has been added to threats on the SWOT.</p>
<p>Monitoring – how will the action plan be monitored and evaluated?</p>	<p>No formal mechanism for monitoring has been set. The Strategy will act as a datum within the</p>

	public realm whereby progress can be judged transparently.
The document could benefit from illustrations and desk top publishing to make it more accessible.	This is desirable but resources are not available to graphically embellish the document at this time.
<p>The top of Chosen Hill should be considered as an addition to the current list of historic assets.</p> <p>St Bartholomew's Church is listed and dates back to Norman times. The link below provides more information about the building.</p> <p><a href="https://new.standrewschurchdown.org.uk/stb-history/">https://new.standrewschurchdown.org.uk/stb-history/</a></p> <p>There are also parts of an Iron Age fort on the top of the Hill. Although some of the fort was lost when Severn Trent built the reservoirs in the 1950's there are still areas where it are visible, and these should be safeguarded.</p>	Noted. Some of the heritage assets mentioned are protected through statutory designation and non-designated heritage assets can be considered through the Local Heritage List.
New developments should be beautiful "sustainable" and welcome wildlife as well as people. Retaining and where practical expanding/creating "green spaces and arteries to access them" by using a combination of urban tree planting, SuDs, footpaths and cycle tracks will help achieve this objective and should contribute to the health/wellbeing* of old and new residents alike. We recommend that the bird & bat boxes are incorporated in the fabric of all new buildings and believe there's sufficient interest from the Construction Industry at large for this to become common practice in the foreseeable future.	Noted, however these points are not appropriate in a strategic planning document regarding built heritage for the Borough.
Twigworth Parish have 8 listed properties, 1 listed war memorial and 1 listed milestone. A closed historic church in the parish - St Matthew's - has suffered from insufficient upkeep in recent years and did not receive S106 allocations. A nomination form has been sent.	Noted.
Housing development as part of the JCS allocation in Twigworth is having an impact on the heritage landscape in the area. Concern over flood risk associated with increased housing. The Heritage Strategy does not address the threat of flooding to identified	Noted. The threat of flooding has been added to the SWOT analysis. Advice regarding flood resilience and heritage assets is available nationally and locally and a link will be provided

<p>heritage assets and should. Tewkesbury Borough Council should communicate to owners of heritage assets appropriate flooding resilience measures to protect these assets. Grants for such flooding resilience measures should be made available and a list of approved suppliers provided.</p>	<p>in the appendix. The introduction of grant schemes is beyond the scope of this document.</p>
<p>UK Government has announced the ban on new gas boilers from 2025 as part of the UK Government's Ten Point Plan for a Green Industrial Revolution. What provisions will Tewkesbury Borough Council make for listed buildings/heritage assets in respect 'green' energy measures to facilitate their continued use. The Heritage Strategy needs to address this in the SWOT Analysis and Action Plan. The Borough Council needs to communicate to owners of listed properties and other heritage assets to ensure that these can be 'future proofed'. Grants for such measures should be made available and a list of approved suppliers provided.</p>	<p>This matter has now been added to the SWOT analysis and a link added to the appendix regarding energy efficiency in historic buildings. Advice and sources of guidance regarding energy efficiency in traditional buildings has and will continue to be available to residents from the Borough Council Conservation Specialist when resources are available. The introduction of grant schemes is beyond the scope of this document.</p>
<p>1.5 The Borough Council has been awarded just under £1.3m funding as part of this scheme which <b>would/ will</b> be match funded.</p> <p>2.1 <b>Most</b> <del>Much of the rest of the borough is</del> made up of rural settlements in the countryside.</p> <p>2.2 Houses within a Conservation Areas generally have a higher selling price <del>than the equivalent outside</del> <b>compared to similar properties outside these areas.</b></p> <p>SWOT Threat  “Conservation of some heritage assets may present viability issues due to the cost of repair/remediation).” <b>No opening bracket</b></p> <p>There appear to be some issues with the pagination of the draft document. Under Weaknesses - Item 6 appears to be missing.</p>	<p>These issues have been addressed.</p>