

Comments on the Conservation Area Appraisal and Management Plan. July 2023.

The Friends of Lewes acknowledge that this is an important document that will assist in the consideration and determination of planning applications and other development matters within and adjacent to the conservation areas. We have examined the document and considered the issues raised, which for clarity, have been set in in a series of headings and referenced against relevant paragraphs.

The Friends of Lewes **SUPPORT** the review of the CAAMP but question why it is limited to the town conservation area and excludes mention of the adjoining Malling Deanery conservation area.

The Friends of Lewes are **DISAPPOINTED** that the CAAMP does not reference the previous and thorough character appraisal, adopted in 2007 and The Lewes Conservation Area Management Plan adopted in July 2013 and omits most of the useful guidance to developers.

The Friends of Lewes **REQUEST** that the draft be amended to respond to the climate emergency by setting out how the energy efficiency of buildings can be improved to reduce carbon emissions and how measures seeking to reduce surface water run off can be incorporated.

The Friends of Lewes **REQUEST** that the important relationship with the town's civic society and the Conservation Area Advisory Group are re-established, together with a commitment to make available to them all pre-application consultations. Without this commitment it is difficult to see how their respective roles as 'the eyes and ears' of the town can be usefully continued.

That the SDNPA **SET OUT** indicative levels of planning officer, conservation officer and enforcement officer support that they intend to provide to this part of the South Downs National Park.

That the review of the document **TAKES ACCOUNT** of its useability by householders, developers, architects, and other professionals to provide clearer guidance on the highlighted issues within the conservation area, and of the relationship to the SDNPA Design Guide Supplementary Planning Document.

That on the available evidence, the Friends of Lewes **DO NOT SUPPORT** the reduction to the boundaries of the conservation area, which appear inconsistent with the previous enlargements and would seem to suggest that new development has not achieved the policy requirements in design quality.

The Friends of Lewes **REQUEST A RECONSIDERATION AND MORE ASSESSMENT** work to clarify the appropriateness and scope of changes to the Article 4 Direction.

In view of the concerns raised about traffic management issues and the public realm, The Friends of Lewes request the SDNPA to **COMMENCE A DIALOGUE** with the Highway Authority to review the 1969 experimental traffic management arrangements and especially the maintenance of highways in the town in order to maintain the town's attractiveness to visitors and residents - consistent with reasons for the designation of the conservation area.

Previous character appraisal and management plan.

These documents do not appear to be available on the SDNPA website and it is unclear why they are not referenced in the current draft. The management plan 2013 took recommendations from the 2007 Character Appraisal as its starting point and set some measurable milestones.

The 2013 management plan included several action points. It is unclear if these were met and, as a starting point, the current document should provide details of the progress that has been made and any difficulties experienced. There seems little point in setting new goals or objectives if existing ones were not achieved. In terms of the Article 4 Direction, the necessary monitoring of change should be highlighted (Action Point 3) so the work underpinning the current recommendations is understood. The progress with the scheme of heritage interpretation and visitor signposting (Action Point 4) should be outlined. The FoL have an established and respected scheme for erecting cast iron commemorative plaques provided in conjunction with Lewes Town Council, placed on various buildings and structures around the town.



Friends of Lewes plaque to Lewes House High Street.

They are intended to inform visitors and residents of historic points of interest around our town and to help bring history to life. Information Boards have also been put up in Pipe Passage and in the Garden of Peace in the Castle Precincts. An update on the building maintenance education awareness campaign (Action Point 5) and the management plan awareness (Action Point 6) would be appreciated.

The role of the civic society

We note that Ian Harvey (Historic England Places Panel Expert) delivered an address to Historic England's staff conference in early July to shed light on the essential role of civic societies in protecting the historic environment. Ian said that through their dedication and community involvement, civic societies ensure the protection of the local historic environment, foster public engagement, and advocate for the protection of historical sites. Ian highlighted how civic societies act as guardians of our built heritage by promoting civic engagement, raising public awareness, and advocating local initiatives, playing a pivotal role in preserving our shared heritage for future generations.

This is the case in Lewes, with a knowledgeable Friends of Lewes team, including professional expertise, reviewing all planning applications on a monthly basis providing recommendations and constructive comment where relevant. At the same time attention is drawn to breaches of planning control and buildings that have fallen into disrepair. This has become more important now that planning and conservation officers are no longer based in Lewes and are not able to be in a position to monitor change.

The 2013 version of the SDNPA management plan sets out the importance of local organisations, such as the FOL, but these are omitted from this revision which suggests that these are no longer of importance or relevant to the SDNPA. In the determination of previous planning applications, members of the SDNPA Planning Committee have highlighted the value of views from this established civic society, and we trust this will continue. Given the close relationship between the two, it is unclear why this approach has been taken.

Planning pressures in the town

The town's conservation area is under particular strain at the moment with a large number of empty shops. Important planning decisions are pending which will determine the future of the town, not least whether public car parks and the tourist coach park should be retained, and where any replacement bus interchange facility should be located. At the same time significant existing employers are choosing to relocate away from the town, including Lewes District Council and Gorrings Auction Galleries. There is also concern at the amount of traffic within the town and whether the existing traffic system, that predates the by-pass, is still appropriate and best serves the town and its economy.

It is therefore a watershed moment for the town and it is important that the LCAAMP considers these broader matters to ensure its relevance.

Climate emergency

Both the South Downs National Park and Lewes District Council have declared a climate emergency and that there is a stated need to improve the energy efficiency of buildings to reduce carbon emissions. The SDNPA fails to offer detailed and clear guidance on reconciling action on climate change with the protection of the built heritage and the conservation area. Whilst the SDNPA emphasise the need to either preserve timber windows or replace them with new timber ones it would be helpful to indicate how this could be done in an energy efficient way, particularly in those buildings which have sash windows. This should also clarify where secondary glazing is preferable and the need for any consents for listed and non-listed buildings. Clarity should be provided on the insulation of walls and roofs, both internally and externally. It is acknowledged that thermal bridging is a key issue.

The renewable heating, and, increasingly, the cooling of buildings, is a key issue and guidance should be provided on how this can be best be addressed to ensure the continued use of buildings in harmony with the conservation area. In particular, the parameters and guidance on the use of air heat source pumps, solar water heating and photovoltaic panels should be provided and where relevant the need for planning permission or listed building consent.

Within this advice, sustainable urban drainage principles should be promoted to provide greater areas of permeable surfaces in order to increase control of surface water. In Lewes, with its vulnerability to flooding in different areas, this will help reduce such risks, thus protecting and preserving parts of the conservation area.

Paragraph specific comments: -

Turning to the document itself, the Friends of Lewes have examined the draft and have the following comments on individual paragraphs: -

Para 2.7 There should be special mention of the large and unique collection of mathematical tiled buildings within the town. It is reputedly, the largest collection of such buildings in the country.

Para 3.25 and 3.26 Again, there should be some recognition of the large and unique collection of mathematical tiled buildings within the town, and the particular maintenance challenges these pose as shown by the complex restoration works at 200, High Street and 1, Mount Pleasant.

Para 3.40. The statement regarding Phoenix Causeway should be corrected. The sequence of events was that the County Council brought about the closure of the Uckfield railway line to enable the Phoenix Causeway to be built, being the first part of the destructive inner relief road proposed by the County Council. The Friends of Lewes and local residents made the case for the bypass which was eventually accepted and built. However, the one-way 'experimental' traffic system instigated in 1969 to move traffic through the town in advance of the bypass construction has remained in place despite repeated requests for it to be adapted to suit the needs of the town rather than the continued free flow design which encourages fast-moving through-traffic.

Para 3.42 There should be mention of traffic calming in Southover and Friars Walk and Lansdown Place as well as Market Street, although this has subsequently been removed. Also, there should be references to the current challenges caused by the closure of the bus station and the impacts on the town from the temporary facility in the High Street, and the associated uncertainty.



Bus layover in Eastgate transferred from former bus interchange.

Figure 44. Southover House is no longer the office of the Lewes District Council, who have relocated to Newhaven.

Para 4.20 There should usefully be a picture of mathematical tiles and a more detailed appraisal of the issues that this gives rise to.



Mathematical tiled Trinity House in the High Street.

Para 4.22 More care is required with the drafting and generalisations in this paragraph. The reference to scale and massing should more accurately refer to two- to three-storey development which is what predominates within the conservation area. It is presumed that the reference to '7 storeys' is in relation to County Hall, which is generally seen as incongruous and an eyesore simply because it is out of scale with its surroundings.

4.28 The acknowledged survival of historic shopfronts in the Conservation Area, and their value to its character and appearance is noted. In the light of the current very high vacancy levels the LCAAMP should address the most appropriate way to safeguard retail premises helping to ensure that the valuable external features are retained.

Para 4.33 It is not the case that 'modern buildings are typically characterised by a larger scale than historic buildings, including the post-war developments to the pedestrianised High Street and office buildings to the north end of Friars Walk'. These have been kept at two and three storeys mainly as a result of concerted efforts by the Friends of Lewes.

Para 4.34 The reference to 'Along Rotten Row and in the Wallands the residential buildings are considerably larger in scale than those prevalent elsewhere, with large detached villas commonplace compared to the more modestly-scaled terraces extant elsewhere within the Conservation Area, reflecting their suburban location with space at less of a premium' needs review. It is considered that the footprint of buildings is greater but the scale is still predominantly two storey and therefore not 'considerably larger'.

4.36 There needs to be more recognition of the significant tree cover within the town that led to its inclusion within the National Park and, more recently, the international designation of the town as an Arboretum Town. The green gateways within the town are also important characteristics and should be acknowledged.

4.39 There is varied streetlighting throughout the Conservation Area. The more historic structures need to be identified and recorded to ensure they are not lost. Elsewhere a clear policy is necessary to clarify the designs of lighting columns, colour finish as well as the shape of the lamp and the type of bulb. It is recognised that certain lamps are more appropriate in historic settings.

Para 4.41 There should be cross references to the viewpoints that are identified in the Lewes Neighbourhood Plan.

Para 4.46 Brack Mount should be added to the list of landmarks.

Para 4.65 acknowledges that the river Ouse is a highly important feature, contributing greatly to the significance of the settlement. The open space along the banks of the Ouse and longer views are acknowledged as being important in views towards the town and its topography. It is noted in Figure 86 there is reference to views and this should also make reference to the somewhat new alien building of the 4/5 storey Atelier Court development included within the picture below.



The harmful impact of Atelier Court Brooks Road on the setting to the conservation area.

Character section.

There is no reference in the character area section on how the character areas were selected or the boundaries defined, nor the basis for the selection of areas for enhancement or important views. This should be explained. The views on traffic impacts seem rather random and are not reflective of the wider impacts across the town and should be assessed in more detail.



Unacceptable impacts of HGV negotiating East Street/Albion Street corner.

Para 5.8 The Phoenix Causeway to the north of the character area was opened in July 1969. Whilst Cliffe was badly flooded in 2000, new flood defences erected in 2009 have been limited, and much of the area is still unprotected and liable to flooding.

In terms of character area '01 Cliffe' the car park in South Street referred to in Figure 161 (page 112) should be added to the 'Areas for Enhancement'.

Para 5.86 The statement that, 'On the north side of East Street there is a series of red brick terraces with classical doorcases and wide tripartite sash windows beneath first floor canted oriel windows' is inaccurate. The terrace is largely mathematical tiled buildings and represents the only staggered mathematical tiled terrace in the country.

Para 5.106 There is reference in this paragraph to the high proportion of designated heritage assets and only a few undesignated buildings of townscape merit, such as the Eastgate Baptist Church. This is inconsistent with the character area plan which shows all the church as being of townscape merit.

Para 5.218 The walled-off and covered over Southern Water reservoir at the intersection of the High Street and St Anne's Crescent, is **not** considered to sit incongruously within the established streetscape. It is an established and walled structure. The summary of the Upper High Street and Western Road character area should identify County Hall and the associated car parks as an area for enhancement, rather than the water reservoir in St Annes Crescent. This would recognise the impacts of the identified discordant element of this building.

Character Area 05 has missed the important views from the Pells Walk towards the castle and St John's Sub-Castro Church. The West Street car park is also in need of enhancement and should be added to the areas for enhancement. Similarly, the recently reconstructed (without planning permission) advertising hoarding in Mount Pleasant, is unsympathetic, as mentioned in para 5.279, and should be referenced as an area in need of enhancement.



New unconsented advertisement hoarding under construction 18th July 2022 corner Mount Pleasant and New Road.

Character Area 07-Southover has missed important viewpoints from the railway station towards the citadel of the town and from Southover High Street towards Keere Street.

It is considered that the awareness of important views within the character assessments are limited to those solely within the character area and do not consider the interrelationship of views between adjacent areas or important landmarks. This should be rectified to give the selected viewpoints credibility.

Figure 151 on page 104 shows, not only the detracting qualities of modern windows to a Priory Street property, but also the visual harm from the need to store refuse bins on the public highway. This is referred to later in these comments.

Para 6.4 In addition to central government legislative and local policy requirements, there is, as stated in paragraph 6.4, a wealth of best practice guidance and advice available from Historic England and other heritage organisations. The Friends of Lewes have contributed to this with the following Planning advice notes which are available on our website; - <https://friends-of-lewes.org.uk/resources/friends-of-lewes-planning-guiding-principles/>

Shopfronts in Lewes September 2016.

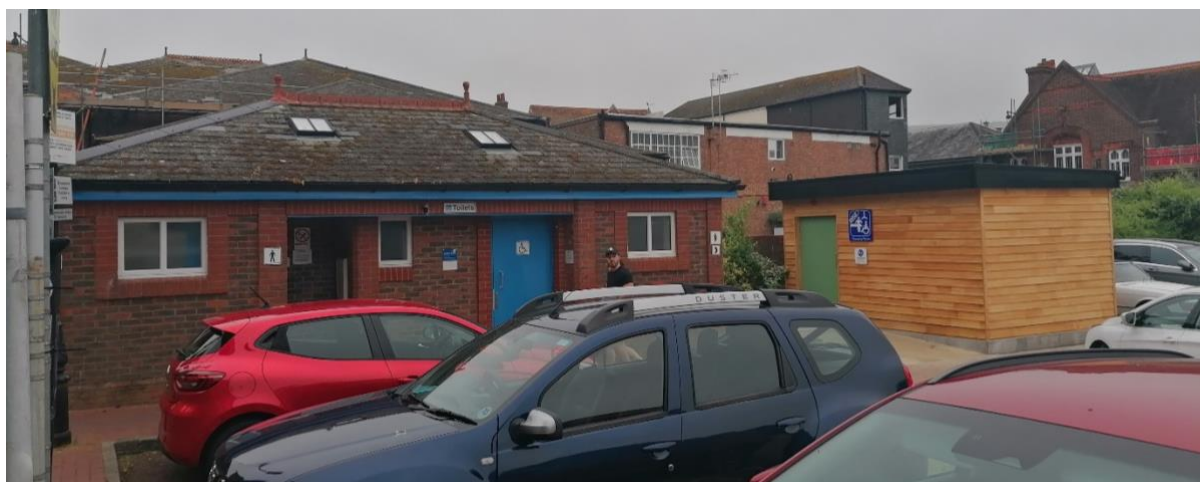
The Design of Dormer Windows. March 2017

The Design of Garden Rooms March 2017

Retail to residential April 2021.

We seek to encourage planning officers, householders and developers to use this guidance but it is not referenced on either the SDNPA or the LDC website.

We are pleased to see in para 6.12, the reference to 'the overarching ambition for the Conservation Area is to preserve and enhance what is special and it is the statutory duty of the LPA to ensure this happens. Preserving and enhancing the special interest of the Conservation Area is achieved by ensuring that change and development take place in a considered and sympathetic way and raising awareness and promoting shared responsibility for looking after the Conservation Area'. It is considered that the specific challenge in Lewes is to ensure that all public authorities adopt this approach, which is regrettably not the current situation with many examples of harm being caused by their actions, and in terms of repairs to flint walls, inaction.



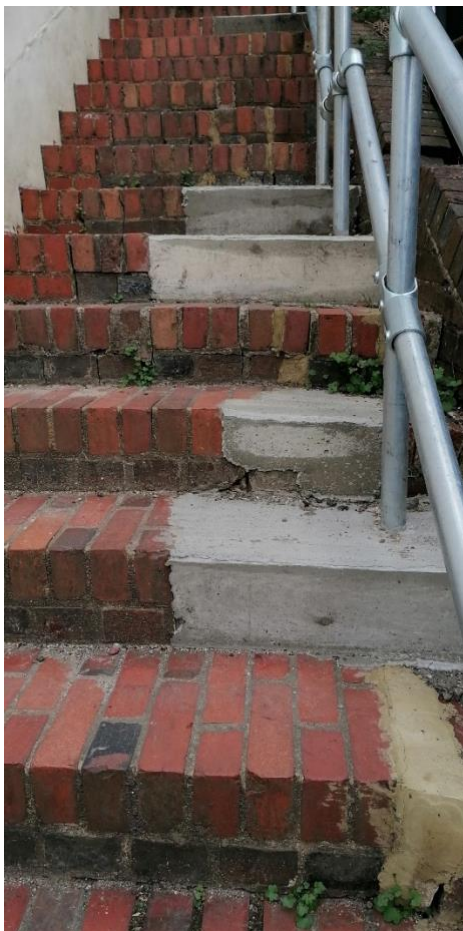
New unsympathetic toilet addition to Friars Walk car park erected by Lewes District Council.

Para 6.13 It is reassuring to see in this paragraph that ‘the long-term objectives are to phase out ill-considered change and additions and ensure new development is of high quality and responds to the special character of the Conservation Area. This applies from very small changes such as reinstating lost historic features to proposals for new buildings both within the Conservation Area and within its setting. In addition, regular maintenance of buildings is a vital part of ensuring the special interest is reserved as well as the physical fabric of individual buildings.



Lewes High Street Tourist Information centre-In need of repair.

Delays in maintenance and repair lead to higher costs as greater deterioration takes place and quickly leads to an air neglect and decay. In this regard, there is a special responsibility on public authorities to set an example to the wider community of businesses and property owners. Repairs can often be necessary, ensuring that these are done in the most sensitive and least impactful ways possible is an important part of looking after historic buildings and the Conservation Area as a whole.’



County Highway Authority crude and unsympathetic repairs to brick steps from Talbot Terrace to White Hill

The recent physical change to the stone steps of a Lewes District Council listed building on the corner of North Street and East Street sharply emphasises the reality of the situation. This does not encourage private individuals and businesses to adopt the correct approach to repairs.



Lewes District Council Unsympathetic Listed building replacement stone step 70 North Street.

We agree with the ten principles set out in para 6.14 intended to ensure the preservation and enhancement of the special interest of Lewes Conservation Area.

The advice within the 'Action Plan for managing change in Lewes' are noted. In terms of theme 1: 'The maintenance, repair and alteration of buildings' figure 159 refers to the management plan and has highlighted the consequence of poorly maintained property - in this case, 3 East Street.



Decaying and dangerous bay window above the East Street footway.

All the suggested advice and methods to maintain buildings are agreed with but the issue that is clearly being faced in a number of listed buildings and non-listed buildings within the conservation area, involves serious neglect. To ensure that this can be addressed, only the LPA have powers to prevent this, and accordingly the management plan must set out how such neglect is to be dealt with. The case of 3 East Street was drawn to the attention of the authority in November 2018, and others have been notified to the LPA by the FoL, but we see little in the way of informal or formal action and only a worsening situation.

Para 6.30 identifies a possible approach if buildings are being neglected by owners, with the LPA getting involved with their repair. We note that if works are considered urgently necessary to the preservation of a Listed Building, the LPA can carry out works as part of an Urgent Works Notice under Section 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The LPA can also serve a Repairs Notice to the owner of a Listed Building, specifying those works it considers reasonably necessary for the proper preservation of the building, under Section 48 of the same Act. Finally, the LPA can serve a Section 215 notice if they judge the condition of land or buildings to be harmful to the area, under Section 215 of the Town and Country Planning Act 1990. Under Section 76 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Secretary of State, following consultation with Historic England, can have works carried out on unlisted buildings that are important for maintaining the character or appearance of a Conservation Area thanks to Urgent Works Notices.

There seem to be that an array of legal tools available to the LPA, but few, if any, are used in Lewes. The LPA need to ensure that in addition to reviewing the Conservation Area Appraisal and Management Plan, that within their management of such areas there are adequate resources available to undertake all the identified tasks. This is not the current case and must be urgently addressed.

The availability of legislative powers assumes that the problem lie in persuading private landowners of the importance of the conserving the character of the conservation area. Many of the examples of harm outlined in this response have drawn attention to the response of public authorities and the need for them to show leadership in such matters.



East Sussex County Council delayed flint wall repairs in Paddock Lane-three years plus!

The statement in para 6.46 that Lewes ‘has not been significantly impacted by insensitive internally lit signage’ is strongly disputed. There are many LED advertising screens facing the streets behind shop windows, hanging from a ceiling to face the street, and internal neon signs facing the street. There is a creeping expansion of internally lit signage in estate agent windows in the High Street, which has not been properly addressed by the planning regime with an absence of enforcement.

It is noted in para 6.57 there is reference to the display of an A-board, and the need for advertising consent. The recent Climate Hub planning application at Lewes House included within it the siting of Friends of Lewes

A boards. At that time, the FoL referred to the LDC guidance note stipulating an unobstructed width of 1200mm but such advice no longer appears to be in place. The FoL are not aware of any consents having been sought or issued in Lewes. Whilst it is stated that this is not a 'big issue' in Lewes, there are a number of places where there is a proliferation of such signage which impact on the street scene and can affect the free flow of pedestrians along pavements. It would be interesting to understand how this is to be managed in the future and which authority is responsible for such consents.



Proliferation of A boards junction of High Street and Fisher Street and patchwork pavement

On page 122 and other places in the 'Managing Change' section, there are a series of recommendations but only 01, 09 and 10 highlighted, with an additional recommendation where: 'Shopfronts and Advertisements in Lewes, adopted in 1992 by Lewes District Council should be readopted by the SDNPA. This was understood 'to give the preservation of shopfronts more weight for the purposes of development management when considering applications for existing and new shopfronts, with the intention to replace this document with a revised and updated version'. Because of the wording of the phrase, it isn't entirely clear what is intended as the document is already in existence and has not been revoked. In any case, it needs to be updated to address the current shopfront challenges which go beyond the structure i.e., to cover illumination, with the increased use of electronic screens and displays.

The Friends of Lewes recently objected to a proposal for the retention of a television monitor in the shopfront of a building within the Conservation Area, as it would set a precedent for similar installations within the Conservation Area. Whilst the electronic screen from the Red Cross shop has been removed, no action has been taken with similar screens in nearby premises. There is an urgent need for consistency in enforcement. Furthermore, the Society recommended that there is a need to review the relevant planning policy for shopfronts within the Conservation Area in order to address this concern resulting from the proliferation of TV screens in commercial properties within the Conservation Area, especially in Estate Agents' windows.



Frontage dominated by unconsented illuminated screens and advertisements. Albion Street.

In para 6.62 there is reference to 'The town features a good proportion of traditional-style lampposts. However, there remain modern utilitarian streetlights on certain streets, including South Street in Cliffe, The Avenue in Wallands and Southover High Street, which are not appropriate to the historic character of the Conservation Area'. The FoL share this concern which extends to the type of lamp installed - which can harm the appearance of historic buildings as well as having implications for the SDNPA dark sky policy.



New bus shelters and illuminated screens High Street

Friends of Lewes

The County Council have undertaken recent changes to street lights with little regard to the character of the conservation area and the setting of listed buildings. It is unclear what redress there is to this situation.



Brooman's Lane new lamp post installed by ESCC with little regard to adjacent paving.

In para 6.63 the public realm to the north of the Castle Precinct, overlooking The Paddock, is identified as being in particular need of enhancement owing to eroded landscaping and low-quality benches. The FoL share some of this concern and would like to join with other partners in preparing a suitable environmental improvement scheme. SDNPA advice on the nature of improvements and sources of funding would be a helpful starting point.

In para 6.64 there is reference to street furniture, road signage, freestanding shop-signage, broadband cabinets, and items such as inappropriately located café seating, which can collectively cause excessive clutter within the public realm and detract physically and visually from the pedestrian experience of the Conservation Area.

This highlights again the need for clear guidance as it is unclear what mechanism of control can be exercised in the context of the statement 'Applications associated with features within the public realm will be carefully considered to ensure that the public streets remain pleasant and attractive places to be whilst ensuring that commercial activities can continue successfully'. Clarity is required on how this control can be exercised and enforced.



Unsympathetic and poor pavement repair Friars Walk.

The pavements and roads within the conservation area, together with the associated street furniture, signage and lighting make up an important component of the public realm. Over the years the importance of enhancement works has been recognised by the County Council, particularly in Southover High Street, Cliffe High Street, Friars Walk, Station Street and more recently St Andrew's Lane. The approved Santon development of the North Street Quarter provided for significant off-site improvement works to adjacent streets to accommodate the redevelopment of the land.

In legislative terms the duty under section 72 of the Town and Country Planning (Listed Building and Conservation Area Act) 1990 is believed to remain applicable to all public authorities, and in particular the County Council need to discharge their duty in respect of conservation areas and continue to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. Furthermore, as the Lewes Conservation areas are within the South Downs National Park, the highway authority have a duty to have regard to the National Park purposes including, conserving, and enhancing the natural beauty, wildlife, and cultural heritage of the National Park (sections 61 and 62 of the Environment Act 1995).

In this context the increasing use of bituminous macadam or similar standard materials to affect repairs within streets of paving slabs and pavers needs to change. The examples from Valance Road and Friars Walk highlight the importance that needs to be attached to this area of maintenance and repair to avoid harmful and irreversible impacts that degrades features which contribute to the area's local distinctiveness and character.



Example of granite setts unnecessarily covered by bituminous macadam within the conservation area at Valance Road.

6.65 It is noted that ‘the installation of e-charging points is likely to become a feature of the streetscene in the coming years. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other reductions in street furniture.’ Schemes have already commenced in different parts of the town and do not seem to have required any prior approval. We hope the SDNPA will develop advice so that the approach to such developments takes place in a more orderly manner. Those recently erected in the Little East Street car park are outside of the permitted development rights in Part 2 Class E of the GPDO Class, being within two metres of a public highway. In this case, the non-adherence to planning provisions needs to be addressed.

More widely, if the revolution in transport is to be accommodated with many more on and off-street charging points, there needs to be clear guidance from the SDNPA on how this can be achieved whilst respecting the character of the conservation area.



E-Charging points and cabinets/air quality monitoring station clutter. Little East Street Car Park.

Under the recommendations on page 125, it is noted that ‘06 Trees and open spaces which contribute to the character of the Conservation Area should be retained and opportunities for new tree planting and green landscaping should be taken’. The SDNPA will be pleased to know that the FoL have over a number of years embarked on an extensive campaign of tree planting. It is a goal of the FoL to increase tree canopy cover in Lewes, from the current 11.5% to the minimum recommendation for urban environments of 20%. We aim to do this by building on our successful projects to date and supporting other local groups with similar aims. This work has recently been internationally acknowledged with the town being recognised as an Arboretum Town. <https://friends-of-lewes.org.uk/2023/05/26/lewes-wins-international-recognition-as-an-arboretum-town/>

This achievement, of course, builds on the tree planting and conservation work by previous community groups, local councils, and residents. It is hoped that it will motivate others in our community to work with the FoL to plant more trees and mitigate the threats to our tree population. These threats include climate change, pests and diseases, the unnecessary felling of healthy trees, and the pressures of increased housing and infrastructure. It is recognised that we all need to plan and plant for the future.

In terms of the managing change recommendations on page 127, the Society are in agreement that ‘Measures should be taken to reduce or calm vehicle movement in the Conservation Area to improve air quality and make active travel more pleasant and safer’. We look forward to working with the SDNPA and the Highway Authority to secure lasting changes to the traffic management system in the town, so that the full benefits of the bypass and Cuilfail tunnel can be realised.

The ‘general guidance on alterations in response to climate change’ at paragraph 6.75 is noted. This has become more important and the Society would request that much more guidance is available to guide households and businesses. This should cover issues such as the siting of air source pumps, solar panels and moveable solar panels, double glazing within existing windows and replacement windows.

07 boundary review.

The review of boundaries to the conservation area is noted.

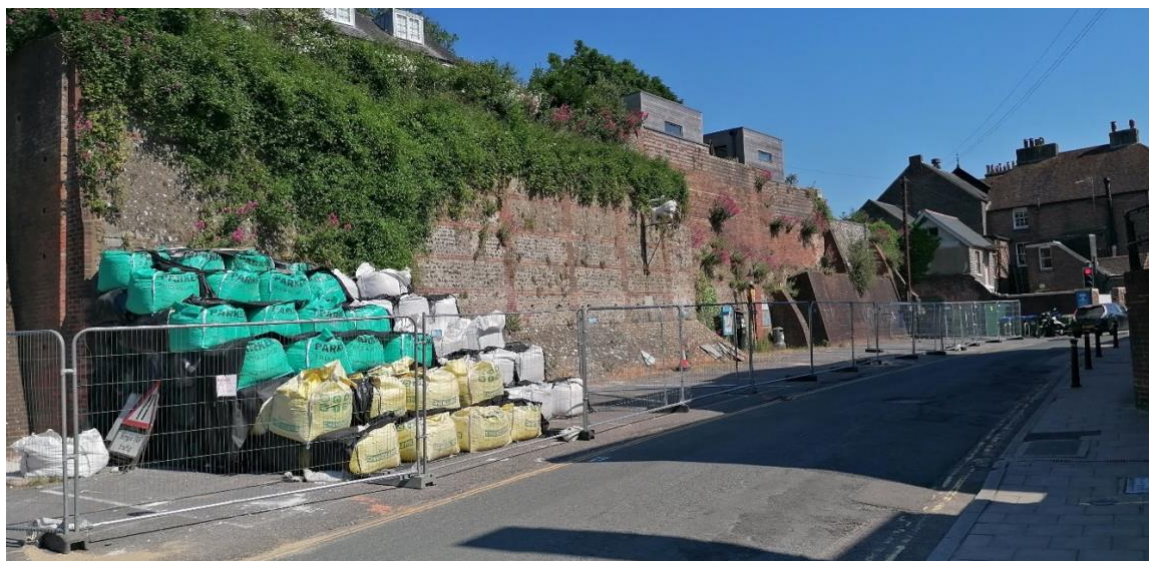
At Para 6.87 there is reference to Astley House, which sits between Spital Road and De Montfort Road, occupying a narrow site which is almost entirely encircled by the Conservation Area. The high degree of intervisibility between the site and surrounding Conservation Area means that any proposals for its redevelopment need to preserve and enhance the special interest of the surrounding Conservation Area and recognise the site's prominent role in the streetscape of De Montfort Road and Spital/ Western Roads. It is considered that there is merit in including the Astley House site within the conservation area.

The reasons for the removal of Cluny Street, Monk's Lane, Verrall's Walk, Anne's Path and Morley Close from the Conservation Area are noted in para 7.4 and 7.5. However, given the very sensitive location of the site to Southover High Street and the development being undertaken subsequent to the designation of the conservation area the decision to exclude the development would indicate that the principles of conservation were not observed in its redevelopment. This approach would set a dangerous precedent throughout the town with many more 'modern development sites' being excluded. The conservation area needs to be considered in its broadest sense, and therefore the deletion of this area is not supported. The same applies to the proposal to delete Wallands Rise.

We would ask that consideration should be given to the inclusion of the Lewes Railway Land at the end of Railway Lane within the conservation area given its importance to the setting of the town. It is also suggested that consideration is given to the inclusion of the historic part of Malling Street including the Malting building. The conservation area should also be extended to include the established trees that frame the conservation area on the north side of Phoenix Causeway between Green Wall and the River Ouse.

Article 4 Direction

The current Article 4 Direction covers the whole of the Conservation Area, except the 2012 extension and Malling Deanery. When introduced in 1996, applications to comply with the Article 4 Direction required a free and a quite simple application to the LPA, often by letter. Since this time, planning fees for such applications have been introduced together with a requirement for a formal application accompanied by a heritage statement, often necessitating the appointment of a specialist. In response to these significant costs few applications are being made and with the decline in resources to address enforcement many are undertaking works without consent undermining both the Article 4 Direction and the planning system itself. It is widely recognised that local planning authorities, along with the wider public sector, are facing significant resourcing challenges. Continuous chronic under-resourcing is clearly burdening local planning authorities, leaving them struggling to meet public expectations and support the delivery of the expected planning service. Clarity on the enforcement intentions of the SDNPA are required if changes to the Article 4 Direction are to be taken forward.



Collapsing neglected flint wall Westgate, on land owned by Lewes District Council.

In terms of the changes to current Article 4 Direction, the basis for the changes is not explained by the SDNPA. It needs to be clear what the existing problems are and how this will address them. In principle the changes that are proposed are generally supported, but in terms of provision 6 this must be extended, as should the list of relevant properties to include all non-residential properties within the conservation area. Recently, two premises in Western Road have had dramatic unauthorised changes to the colour of their front elevation but this was considered to be outside the scope of current Article 4 Direction because they were deemed to be partially retail/commercial premises rather than residential. This inconsistency must be addressed.



Yummy Yummy, Western Road. Recent colour change which is outside the planning authority's control.

Similarly, we would request the extension of the article 4 Direction to remove permitted development rights to the Highway Authority and the utility undertakers. Local authorities and utility undertakers have not taken the approach expected in the LCAAMP.

To ensure the conservation area can be protected, such action is warranted. Considerable harm has occurred from the erection of public toilets, air quality monitoring stations, kiosks and cabinets for various purposes and waste receptacle points. The photographs within this response highlight these impacts. Accordingly, it is requested that the Article 4 Direction is extended to include restrictions on under Part 9-Development relating to roads, Class A and Class C – development by highways authorities or road transport undertakings: Part 12 Class A development by Local authorities. Part 16 Class A electronic communication apparatus.

In many parts of the town the impacts of the District Council's decision to introduce domestic waste and recycling collection has had a dramatic effect on the appearance of streets and car parks.



West Street car park waste bin/defunct and neglected air quality monitoring station.

The consequences to the conservation area are readily apparent causing a radical change and harm to the appearance of the conservation area, as well as impacting on the setting to listed buildings.



Bin Alley-On highway wheelie bin storage Brooman's Lane.

Not only has it resulted in bins being left on public highways and car parks but structures being erected within front gardens which affect the streets scene. These indirect consequences are equally harmful and have resulted in the need for enforcement action. Again, this is an area where detailed advice from the LPA would be invaluable, so that residents can best meet the challenges caused by the introduction of wheelie bins in a manner which protects the character of the conservation area.



Front garden structures to accommodate wheelie bins Paddock Road.

These impacts should have been considered and avoided. It is requested that this should be addressed through the LCAAMP.



Conclusion.

We have highlighted above the many issues that need to be addressed if Lewes, as the so-called jewel in the National Park, is going to be preserved. Many of the concerns, issues and actual harm have resulted from actions by public organisations and can be seen to influence the action of householders and businesses. Unless the public authorities take a more responsible attitude to the preservation of the conservation area and reflect this in their actions, we are concerned that the evidenced spiral of decline and harm will continue. An important part of this will be the resources allocated to this by the SDNPA and we hope that the development of the LCAAMP will be the first stage of this.

The Friends of Lewes look forward to your response on these matters.

5th August 2023.