

LEWES CONSERVATION AREA MANAGEMENT PLAN



South Downs  
National Park Authority



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CONSULTATION DRAFT

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South Downs National Park Authority  
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## **I. Introduction**

- I.1 The Lewes Conservation Area Character Appraisal was adopted for development control purposes by Lewes District Council late in 2007.
- I.2 The appraisal was prepared by a team of consultants, The Conservation Studio, following guidelines published by English Heritage and was subject to a programme of consultation in 2006 with stakeholders and the public. During this process it evolved through a number of drafts in response to the many points of view represented.
- I.3 The document was intended to complement policy content in the Lewes District Local Plan of 2003 and was also designed to be read in conjunction with the former Planning Policy Guidance Note 15, 'Planning and the Historic Environment'. This guidance was replaced by Planning Policy Statement 5, 'Planning for the Historic Environment' in 2010 which, in turn, was replaced by the National Planning Policy Framework in March 2012.
- I.4 While Lewes is renowned for its iconic downland setting and generally high level of preservation, the Character Appraisal identified a large number of issues which adversely affect the character of the town. Section 9.1 of the document set out specific recommendations intended to inform an agreed plan for the long-term management and enhancement of the conservation area. Although a number of the individual recommendations have been resolved or addressed in the intervening period, the original intention to build a Management Plan upon the foundations they laid down did not come to immediate fruition.
- I.5 In April 2011, as the culmination of a long process of gestation, the South Downs National Park Authority assumed its powers as Local Planning Authority. Day-to-day Development Management functions remain with Lewes District Council, under a formal scheme of delegation, but responsibility for policy matters now rests with the National Park Authority.
- I.6 The South Downs National Park is unusual amongst National Parks, in containing a substantial resident population of around 110,000, as well as sweeping landscapes and a rich natural and cultural heritage. Lewes is one of two large towns within its boundaries and was included with due respect to the symbiotic relationship it enjoys with its rural hinterland. While the inclusion of significant urban areas within the National Park represents a challenge in terms of policy and management, there can be no doubt that the intricate and layered townscape of Lewes is a jewel, every bit as precious as the landscape that surrounds it.
- I.7 This Management Plan uses the recommendations drawn from the 2007 Character Appraisal as a starting point, with an aim to focus early debate on the future management of the town and establish some clearly measurable progress milestones for the final half of the ten year life-span of that document. The objectives listed in Section 5, offer a possible framework for further and subsequent actions, beyond 2017.

## 2. The Issues

- 2.1 Historic towns must constantly evolve if they are to thrive and function in the Twenty First Century. There are multiplying pressures, from ever-increasing car use with its implications for town centre congestion and parking demand, to changing retail requirements, resulting in demands for larger or regularised floorplates. The latter trend is often accompanied by a reduced desire for the other uses that traditionally occupied the upper floors of town centre buildings.
- 2.2 The narrow, confined streets of Lewes certainly suffer from the curse of traffic congestion, though the survival of a vigorous independent retail sector as well as the high value of residential floor space within the town may mean that the problem of upper floor underuse is less acute in Lewes than in many comparable locations.
- 2.3 There is an entirely new pressure for enhanced telecommunications and improved broadband speeds. This can result in regular disruption to street surfaces and the proliferation of cables, both fixed to buildings and overhead. Technology is constantly changing and when services are added or supplemented, redundant cables or ducts are usually left in place, resulting in needless and often unsightly clutter on building facades. The residue of long redundant Rediffusion cabling on many buildings within the town is an example of this issue.
- 2.4 The cost of providing high level access can mean that attention to mundane day-to-day issues, like the maintenance of paintwork or gutter clearance, can be neglected, creating incipient problems of decay for the future.
- 2.5 As is the case in many other places, patches of land which do not enjoy obvious or active ownership and corners of the public realm which seem to be of limited use tend to become neglected. This is a problem which is likely to become more severe as the public purse shrinks over the coming years, unless new sources of funding or other innovative ways of dealing with the problem can be found.
- 2.6 One over-riding problem which will inevitably recur is a confusion of responsibility for individual issues. For example, the South Downs National Park, based in Midhurst, is the Local Planning Authority and is ultimately responsible for planning matters in the town, but it currently delegates the day-to-day administration of most Development Management to Lewes District Council. Therefore, the role of the Lewes planning and conservation staff remains critical to assessing the quality of new development within the town and monitoring the sensitivity with which alterations to historic fabric are carried out. To take another example, the planning staff of either Lewes District or the National Park have very little responsibility for highway management and public realm functions, which are enabled by East Sussex County Council, as Highways Authority. Managing flood risks are the responsibility of the Environment Agency, a national body, but the regular maintenance of street gullies and the management of

surface rainwater run-off falls to the Highways Authority. The collection of street litter, which, if left may gather to block gullies and drains, is the responsibility of the District Council.

- 2.5 It is easy to see that if the public bodies do not communicate effectively, problems which exist on the boundaries of their individual responsibility will persist. At a time when budgets and staff resources are stretched and there will not always be time for day-to-day consultation or regular meetings, the existence of a Management Plan to set out responsibilities and to which all parties are committed may reduce the incidence of inadvertent conflicts in the actions of the separate agencies.
- 2.6 As well as the major public bodies, local organisations have a critical role to play. Of these, Lewes Town Council will be important. It is alert to all issues in the town, it is democratically accountable and is in a unique position to respond to local concerns. However, its resource base is small.
- 2.9 As the Forward to the Character Appraisal observes, Lewes is well served by the enthusiasm of its inhabitants for its preservation and protection. This has led to the formation of a large number of voluntary organisations, charged with the furtherance of these aims. The Conservation Area Advisory Group is notable in that it has a formal advisory role. Others act as pressure groups, or as a focus for volunteer or academic effort.
- 2.10 The Appendix to this document collates the recommendations made within the Character Appraisal. Where significant progress has already been made, this is acknowledged in red. A few recommendations are new, having been raised during initial discussions with stakeholders in the town. Other issues may emerge as a result of the public consultation process for this document. Where practical solutions to identified problems can be devised, this may generate further objectives, which may be added to section 5 in the final draft.



### 3 Principles

- 3.1 The following paragraphs set out fundamental principles which should be observed whenever works of repair, alteration or innovation, large or small, are considered within the conservation area.
- 3.2 The necessity to make changes should be considered carefully on a case-by-case basis, not automatically assumed. Change can be good where it clearly enhances character or amends past harm, but alterations undertaken simply for their own sake or to fall in line to an arbitrary standard, such as a corporate identity, will not always be appropriate.
- 3.3 All works should be conceived with specific regard to the character and appearance of the conservation area. Any intervention should echo and reinforce those characteristics of the buildings, townscape and public realm of Lewes which make a positive contribution to the town and its local distinctiveness.
- 3.4 All works, whether of alteration, repair or maintenance, should be executed to a high standard, with the aim of preserving or enhancing the special characteristics of the town. If the immediate context displays no special characteristics, the works should be devised to enhance the location or, at least, leave a neutral impact.
- 3.5 New works, repair and maintenance should utilize the traditional materials used in the town. If they are now unavailable, they should use materials which match them in character or appearance. Preference should be given to materials sourced locally or regionally over alternatives transported great distances.
- 3.6 Where opportunities occur to achieve positive enhancements to a building or townscape, they should be integrated into future development proposals.
- 3.7 Green spaces within the town should normally be retained and tree care and vegetation management should respect local amenity and reflect ecological best practice.
- 3.8 When planning the maintenance of buildings and places, opportunities should be taken to remove redundant items of infrastructure. Whenever infrastructure is due to be supplemented or replaced the continued need for existing items should be questioned. Potential for the undergrounding of overhead lines should not be overlooked.
- 3.9 Maintenance and repair work must respect historic fabric, features and street surfaces. The central aim should always be to maximise retention of historic fabric and minimise necessary intervention.
- 3.10 Whenever new or altered maintenance regimes with the potential to affect the character and appearance of public land are to be introduced by

public authorities, councils or agencies, an appropriate level of consultation should be undertaken with other organisations, before decisions are made.

## 4 Management Tools

### *Monitoring Change*

- 4.1 It is important to establish a baseline when assessing change in any conservation area over time. Unlike a museum exhibit or a work of art, a town is a living entity, a complex backdrop against which people live, work, learn and play. As human behaviour unfolds and these patterns of activity develop and alter, some degree of change to that backdrop is inevitable. Some changes will be modest in scale, others more fundamental. Some will concord with the settled character of the place, while others may have the potential to clash. Some will be carefully planned, the result of an elaborate and broadly democratic development management process, while others will be almost incidental, the result of ever-changing technology, or a passing fluctuation in a maintenance budget, or an ephemeral fad or fashion. Not everyone will agree which changes are good and which are for the worse.
- 4.2 To begin any process of assessment or analysis, it is necessary to capture images of the town at a given point in time, sufficiently detailed to monitor subsequent changes.
- 4.3 Lewes has a remarkable historic record in the archives of Reeves, the long-established photographic studio on High Street, but this is a private resource.
- 4.4 The photographs in 'Images of England', on the web-based Heritage Gateway, are publicly accessible and provide a consistent and reliable, frontage-by-frontage resource from the turn of the Twenty-First Century, but they only record listed buildings, albeit a high proportion of the total buildings in the commercial centre.

#### **Action Point 1 – within one year**

A fresh photographic survey of every street frontage along the principal thoroughfares of the town centre is the simplest means to establish a datum point. With this record secured, subsequent change can be monitored in a systematic way, to inform plan-making, ongoing management and planning enforcement.

### *Planning Policy*

- 4.5 Planning policy is an obvious and critical tool with which to manage development pressure within the conservation area. Partly, this is set by Government priorities laid out in the National Planning Policy Framework,

but it is supplemented by 'saved' Local Plan policies inherited from Lewes District Council by the National Park Authority in April 2011.

4.6 The National Park Authority is working to establish its own Core Strategy, which will be the subject of a programme of consultation in Lewes and across the wider Park over the coming months. It is essential that the new policies are sufficiently robust to ensure that all new development is well-considered, supported and informed by the careful analysis of existing townscape character and potential impact.

4.6 Lewes was separated into three administrative units until 1881, Lewes, Cliffe and Southover. Even to the casual observer, these entities still retain pronounced variations in historic character within the town. The Character Appraisal probed more deeply in its analysis and divided the conservation area into seven discreet character areas. It also identified an area between Rotten Row and St Anne's Crescent which was thought to justify future inclusion in the conservation area. South Downs National Park Authority approved the principle of this extension in December 2011 and subsequent consultation has revealed a strong level of local support for the proposal.

**Action Point 2 – immediate**

South Downs National Park Authority will extend the Lewes Conservation Area to include land to the south of St Anne's Church and St Anne's Crescent.



- 4.7 Lewes District Council has imposed an Article 4 Direction within the town to control the incremental alterations to dwelling houses which are normally possible through the exercise of 'permitted development' rights, granted to householders under the General Development Planning Order. These Directions appear to have been reasonably effective in protecting the original character of unlisted houses within the conservation area.

**Action Point 3 – ongoing**

Lewes District Council will monitor changes in residential locations within the conservation area. South Downs National Park Authority may also consider the application of further Article 4 Directions should the character of those streets appear threatened by uncontrolled change.

*Critical Friends*

- 4.8 The Lewes Conservation Area Advisory Group has an important part to play in monitoring development proposals within the town. In addition to this ongoing task, it undertakes practical enhancement projects when resources allow.
- 4.9 There is also potential to further promote the wide variety of other organisations with an interest in the historic built environment. While it is invidious to single out interest groups, the Friends of Lewes have a particularly distinguished record of influence and practical action within the town, dating back to 1952. Also noteworthy is the Lewes Buildings Preservation Trust, a revolving fund which has offered grants to encourage the appropriate repair of flint walls in the town.
- 4.10 Sussex Archaeological Society has a far wider geographical remit than Lewes, but it is based in the town and it owns four historic buildings, including Lewes Castle and Anne of Cleves House in Southover High Street. Both of these buildings are run as visitor attractions.

*Education*

- 4.11 In its widest sense, education and interpretation are important tools which help to engage residents and visitors with the rich history of Lewes. Interpretation on the streets, in the form of robust plaques or panels, can be particularly effective in alerting young residents to the more intriguing chapters in the story of their town, information which will often seep in, barely noticed, ready to be re-ignited into a deeper flame of interest in later life.

Residents who are engaged with the history of the town will inevitably engage in efforts to protect its character. In the last resort, this is a greater safeguard than any number of management plans.

## *Legibility*

- 4.12 With the inception of the National Park, the town should receive gradually increasing tourist visits. An objective to encourage longer stays would carry useful economic as well as cultural benefits. Effective signposting and interpretation can also play a useful part in ensuring that visitors gain maximum appreciation of the character of the town and find their way to those attractions which are less obvious, or off the beaten track.

### **Action Point 4 – within four years**

Subject to appropriate funding being identified and secured, a scheme of Heritage Interpretation and visitor signposting shall be devised and implemented within the town.

## *Green Space*

- 4.13 Open spaces, both large and small, are an important component in the character of the conservation area. Wherever they make a positive contribution to character, their retention should be a primary objective of the planning process but effective management goes hand in hand with this goal. Neglected spaces can gradually become perceived as a problem, rather than an asset.
- 4.14 Lewes Town Council employs a Town Ranger to undertake small scale practical improvement works and maintenance within the town. Operating on a larger scale, the operations arm of the South Downs National Park Authority is currently perceived as a countryside ranger service, but it does have an existing remit to tackle urban fringe issues and consideration should be given to developing an active, advisory or support role in the green spaces of the Lewes Conservation Area.



### *Public Car Parks*

- 4.15 One category of open space, though essential, does not usually enhance the character of the conservation area. Requirements for car parking cannot be ignored, as many retail and business users depend on an adequate provision for their survival.
- 4.16 Many of the public car parks occupy disruptive gaps in the historic street scene and are poor in appearance. In one case, at Spring Gardens and Brook Street, appearance and function appear equally chaotic, though here it is easy to imagine that a more ordered arrangement to facilitate easier use could actually result in reduced capacity.
- 4.17 No use of decked car parking provision is evident within the town centre. This type of parking provision has left a long trail of architectural disappointment in the vast majority of places in which it has been deployed. A handful of successful precedents exist in historic towns, which might be identified and studied for useful design lessons, potentially applicable in Lewes.
- 4.18 Car parks can offer a useful opportunity to add trees to the townscape to provide welcome colour and shade, if species are carefully chosen.

### *Value of Maintenance*

- 4.19 Poorly maintained buildings usually depress the character and appearance of any conservation area. Damp and the ingress of rainwater is the great enemy of any historic structure. Regular maintenance and minor repairs to buildings to keep them wind and watertight (particularly related to roofs and flashings and the clearance of gutters, downpipes and drainage channels) will pay dividends, avoiding much greater expenditure on major repairs at a later date.
- 4.20 It is usually better and cheaper to do a little repair and maintenance work regularly, than save up problems for major work later. If water is penetrating the structure it will be causing damage, whether obvious or not. Most agents of building decay depend on an elevated moisture content within the fabric to thrive. In such conditions, dry rot and beetle attack will eat away at the building, unseen. Once the decay becomes obvious, major repairs will be required and these equate to major cost, disruption and the avoidable loss of historic fabric. The old proverb, 'a stitch in time saves nine' is as applicable to buildings as it is to clothes – perhaps more so.
- 4.21 It should not be forgotten that most of the historic building stock in any conservation area is owned by private individuals or private companies, using their own resources to keep a building in good shape and in use. It is incumbent on building owners to be aware of the threat of incipient decay and to act promptly to head off problems. Councils could

never have sufficient trained conservation staff to monitor every building in every conservation area and warn the owner when something is wrong. By the time it has become necessary for the Planning Authority to use its statutory powers to serve an Urgent Works Notice on the owner of a troubled listed building, it is probably too late to stave off deterioration with minor repair. Decay will already have a pervasive grip and serious financial outlay will be inevitable.

- 4.22 Education, however, undoubtedly has a part to play in raising awareness of building maintenance issues. Eventually, in the small minority of cases where private owners are unwilling or unable to act, or simply absent, the Local Planning Authority should be ready to use statutory powers where necessary.

**Action Point 5 – within two years**

South Downs National Park Authority, in partnership with local Organisations, will introduce an awareness campaign on the importance of regular building maintenance for owners and users of the historic building stock.



### *Financial Incentives*

- 4.23 In the past, English Heritage and local authorities have often disbursed grant funds to encourage appropriate building repairs within historic centres. This is a tested and highly effective tool which works in all but the most economically deprived circumstances. However, in the current fiscal climate, it seems unlikely that it will be available to the Planning Authority in the immediate future, though it should remain alert to opportunities that might arise.
- 4.24 The National Park Authority does offer grant schemes to benefit community groups of different types and there is no reason why heritage related schemes should not be eligible for such assistance, given the right circumstances. Lewes Town Council operates a similar fund, though the individual grants are limited to a maximum of £2,000 and offers are usually smaller.

### *Craft Skills Base*

- 4.25 A perceived issue has been expressed related to the craft skills base available to the building contractors in the area of Lewes. If this is confirmed as a problem, the remedy would appear to be relatively close at hand, as Sussex is particularly well served for craft skill courses of different types, available at Singleton and West Dean, north of Chichester.



### **Action Point 6 – immediate**

Develop awareness and understanding of the management plan with the Local community, developers and agents, the Town Council, local and statutory consultees and other organisations and agencies whose work may impact upon the character and appearance of the conservation area.

## **5 The Objectives**

### *Policy and Implementation*

- 5.1 The National Park Authority and Lewes District Council will undertake full consultation on the forthcoming Core Strategy and will provide effective planning policies for the protection of heritage assets and conservation areas.
- 5.2 The Lewes Conservation Area Advisory Group should continue to monitor all development proposals and advise Lewes District Council of their considered recommendations for those which have potential to diminish character. It is hoped that this Management Plan, combined with the Character Appraisal, may assist their work.
- 5.3 Particular care should be taken with the determination of signage proposals under the Advertisement Regulations and planning applications for minor alterations to shopfronts or business premises. Proposals which focus on corporate identity and which do not show regard to the established characteristics of the conservation area should not be supported.
- 5.4 Applications for externally applied security shutters for shopfronts should not be supported, as they are almost invariably unsightly in their own right and are prone to create a desolate and threatening atmosphere in a commercial centre at night.

### *Importance of Design*

- 5.5 Good design in the South Downs National Park is defined as that which supports its purpose to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. In the context of Lewes, conservation of the cultural heritage will be given particular weight.
- 5.6 The appraisal of design is frequently thought to turn on subjective judgements but assessing whether or not a proposal conserves or enhances cultural heritage is capable of definition according to objective criteria. Of these, the most fundamental are form, materials and hierarchy.
- 5.7 In order to provide clear guidance to applicants, the Conservation Area Appraisal (as well as the English Heritage Extended Urban Survey of 2005) go far to define the contextual analysis that will helpfully inform Design and

Access statements. South Downs National Park Authority will also promote design development methodologies which will support and nurture the expression and enhancement of its locally distinctive cultural heritage.

### *Monitoring Change*

- 5.8 Lewes District Council will monitor incremental change to residential streets within the conservation area. Should 'permitted development' threaten to undermine the character of these streets, it will advise the National Park Authority which would then consider the use of further Article 4 Directions to bring future alterations under planning control.
- 5.9 The National Park Authority will undertake a photo survey of every building frontage in the commercial streets of the town centre, including side elevations visible from public vantage points. This survey should be completed during the course of a single week, if at all possible. Efforts should be made to repeat the survey at four-yearly intervals, to create a rolling record over time.

### *Promoting and Understanding the Inheritance*

- 5.10 The National Park Authority shall work with Reeves Photographic Studio to investigate ways in which their valuable photographic archive might be more widely promoted and enjoyed within the town.
- 5.11 The National Park Authority will consider ways in which the historic fabric of the commercial core of Lewes town centre might be surveyed, recorded and better understood. This may be achieved through professional survey methods and academic analysis, possibly assisted by volunteer effort.





### *Building Maintenance*

- 5.12 Consideration could be given to a scheme by which historic commercial buildings in the historic centre are monitored for incipient problems of building maintenance, possibly on a biennial basis. This might utilise high level access by means of a cherry-picker at off-peak times to identify issues that may not be obvious from street level. Initially, this might be funded by the National Park Authority and other public or private sector sponsorship, but to be self-sustaining in the long term, it should primarily be funded through owner subscriptions. It is thought that this could prove realistic, once the benefits of the programme were apparent, as the costs of high level access would effectively be pooled and owners would be the chief beneficiaries.
- 5.13 There is little point in directing rainwater efficiently from the higher levels of a building if it is not then directed away from the foundations. Most of the pavement channels and gullies in the commercial centre are blocked by soil and debris. This is bad for individual buildings, but must also create wholly avoidable and unnecessary ice hazards for pedestrians in winter. Where the channels cross public pavements they are the responsibility of the Highway Authority. They should be cleared as a one-off operation and monitored periodically thereafter.

### *Green Spaces*

- 5.14 A baseline survey of green spaces within the town should be undertaken, noting general ambience, quality of landscaping or planting, presence of tree cover and amenity value. If the space is public rather than private the degree of use should also be noted. There may be potential to undertake this work with volunteer effort.
- 5.15 The maintenance of green or other open sites in public ownership should be reviewed on a case by case basis following the baseline survey. Where shortcomings are perceived, the National Park Authority will raise the matter with the relevant public landowner and will seek to devise appropriate enhancements and sustainable management arrangements.

### *Highways Maintenance*

- 5.16 The National Park Authority, Lewes District Council and East Sussex County Council as Highway Authority should meet annually to agree maintenance priorities for lighting, signage, rainwater drainage, carriageway and pavement surfacing within the conservation area for the following year. Minutes of this meeting should be publicised, on relevant websites and in the press.
- 5.17 Every sign in the conservation area installed under the provisions of the highways legislation or relevant by-laws should be surveyed and its need reviewed. Any signage found to be redundant or duplicated unnecessarily

should be removed. If opportunities are found to rationalise or combine essential signage locations, these should be exploited.

Certain public spaces are particularly important as they act as 'gateway' locations to the conservation area and the wider town. One of the most prominent but least prepossessing of these is currently the Prison Crossroads, the principal entry point from the direction of Brighton. While most of the limited available space here is occupied by highway and there is little prospect that this will ever change, the poor quality of kerbs and paving surfaces and an incremental plethora of highway signage and lighting contribute to a confusing and chaotic visual impression for the visitor. A careful review of infrastructure and relatively modest investment could ameliorate this poor introduction to the town.

Another important entry point is the forecourt of Lewes Railway Station, currently dominated by parking. These spaces as well as the main pedestrian route into town, Station Street, are currently characterised by non-traditional street surfaces, utilitarian lighting and heavy traffic flows. This area would greatly benefit from enhancement proposals.

#### *Public Car Parking*

- 5.18 A review of public off-street car parking was implemented by Lewes District Council recently, but it is important to give full consideration to the enhancement of visual impact, as well as simple parking provision.
- 5.19 One small existing site, beside St Thomas a Becket Church on the corner of South Street and Cliffe High Street, contains twelve parking spaces but at great cost to the visual cohesion of the townscape. Proper consideration might be given to the creation of a small public garden here, bounded by low walls. The layout could probably retain some bicycle parking, without serious compromise to the creation of the new open space.
- 5.20 Decked car parking provision offers some potential to replace minor losses elsewhere but must be considered with great caution. However, for the less sensitive outer locations it should not be ruled out if carefully judged massing and excellent design and materials can be deployed to respond to the immediate context of a potential site and respect wider townscape concerns.

#### *Education and Interpretation*

- 5.21 The Friends of Lewes is currently engaged in a project to provide further interpretation within the town, in the form of plaques. Opportunities for further plaques or panels should be considered where appropriate, to enhance visitor experience and the engagement of residents in the history of their town.



### *Protecting the Skills Base*

5.22 The relatively local availability of practical courses to deepen and enhance the craft skills base available in and around Lewes should be widely promoted within the town. The provision of subsidised places or travel for worthy or disadvantaged candidates, funded from public or voluntary sector sources, could be considered should the take-up of such training opportunities remain disappointing.

5.23 The craft skills base related to historic street surfaces should not be ignored. The training needs of Highway Authority staff and their contractors should be taken into account when assessing need.