

Conservation Officer Comments
Amended Plans or Further Details

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Application Number:	AWDM/0811/26
Location:	13A Montague Street, Worthing, West Sussex
Proposal:	Replacement of existing Crittall windows on north elevation with powder coated black aluminium windows
Case Officer:	Louise Prew

	Further Information Required
	Design Review Required
	No objection - no harm
	No objection - harm is negligible or mitigated
X	Objection - less than substantial harm
	Objection - substantial harm
	Objection – Total Loss

Site and Surroundings:	13A Montague Street occupies a prominent position within the commercial core of Worthing town centre, within the South Street Conservation Area. The building forms part of the northern elevation of Arcade Buildings, a locally listed building of considerable architectural merit, and contributes positively to the established townscape character of Montague Street through its scale, architectural detailing and strong frontage to the pedestrianised street. The upper floors are characterised by painted rendered elevations with decorative detailing, including quoins, cornice and corbels, while the north elevation incorporates large black Crittall windows which provide a distinctive vertical emphasis and form an important component of the building's architectural composition. These features assist in defining the appearance of this part of the conservation area and contribute to the legibility and historic commercial character of Montague Street. The proposal seeks planning permission for the replacement of the existing Crittall windows to the first and second floors of the north elevation, serving Flats 1 and 2, with powder coated black aluminium windows. The submitted information indicates that the proposed units would be formed in a slimline aluminium system intended to replicate the steel-look appearance and narrow sightlines of the existing windows, while improving thermal performance, security and general usability for the residential accommodation above the ground-floor commercial unit. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when exercising planning functions, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area." The LPA's duties are reinforced within Section 16 of the NPPF, Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner
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	appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Non designated heritage assets are also afforded weight in the planning balance as per paragraph 216 of the NPPF. As such, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Other elements held within Section 16 will also be considered as will Local Policy.
Comments:	The steel-framed windows across Arcade Buildings make a significant contribution to the architectural character of the building and to its status as a locally listed building/non-designated heritage asset. They also contribute to the character and appearance of the South Street Conservation Area. As identified in the previous consultations for 8–9 and 10–11 Arcade Buildings, the repeated use of slender metal-framed windows across the wider façade is an important part of the building's inter-war architectural composition, giving the elevations finesse, rhythm, vertical emphasis and consistency. Much of the aesthetic value of Arcade Buildings, and much of its contribution to the conservation area, is derived from its grand Art Deco façade and the coherence of its architectural detailing. The windows are not incidental features within that composition; they form an integral part of the façade's rhythm, vertical emphasis and refined inter-war character. Any replacement scheme should therefore be exceptional in quality and clearly evidenced as being adequate in terms of design, materiality, section size, subdivision, opening arrangement and relationship to the retained façade. The principle of replacing the existing windows is not necessarily objectionable, particularly where the current units are in poor condition, difficult to maintain and incapable of providing reasonable levels of thermal or acoustic performance. It is also accepted that some improvement in performance is desirable in order to support the continued viable residential use of the upper floors. However, improved energy efficiency cannot itself be treated as mitigation for visual or heritage harm if the replacement units would introduce excessive bulk, altered proportions, inappropriate sections or a materially different appearance. It is accepted that the term 'Crittall' is often used as a colloquialism for a metal window of a particular style that was of considerable popularity during the early part of the 20th century. However, the design of early 20th century steel windows do much to convey finesse, style, and elegance and as such in order to ensure consistency along the terrace any replacement window needs to be of an appropriate design and appearance. Crittall or not to Crittall, that is the question or point of concern raised by both the Worthing Society and others on similar applications, which is also pertinent in this instance. Turning to the legislation it is noted that the conservation area designation brings Section 72 of the

Planning (Listed Buildings and Conservation Areas) Act 1990 into consideration and the desirability to preserve or enhance character and appearance of the conservation area. Policy DM24 of the Worthing Local Plan and Section 16 of the NPPF do much to reinforce this requirement.

Paragraph 207 of the NPPF requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting, in a level of detail proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance. In this instance, no heritage statement has been submitted which properly assesses the special architectural interest of Arcade Buildings as a locally listed building, its contribution to the character and appearance of the South Street Conservation Area, or the impact of the proposed window replacement upon that significance. This is a material shortcoming in the submission and limits the ability to conclude that the proposal would preserve or enhance the conservation area or sustain the significance of the non-designated heritage asset.

The submitted proposal indicates the use of powder coated black aluminium units intended to replicate the appearance of the existing Crittall-style windows. The provided details indicate that a Fabco system may well be capable of adequately reproducing the sections required; however, this is not clearly evidenced in the submitted drawings, as existing sections are not present, or in any heritage statement, as one has not been provided. While aluminium may be capable of achieving a visually recessive and metal-framed appearance, the critical issue is whether the detailed design accurately reflects the existing windows in terms of glazing bar widths, meeting rails, mullions, transoms, frame depth, relationship to the surrounding opening and method of opening. Any proposed replacement should be assessed against the existing windows on this elevation, rather than against a generic Crittall or heritage aluminium system.

The submitted drawings do not presently provide sufficient detail to demonstrate that this outcome would be achieved. The drawings should clearly annotate the proposed glazing bars, stiles, rails, meeting rails, mullions and transoms, and should include suitable horizontal and vertical sections showing the relationship of the new frames to the existing apertures, retained surround, façade panels and mullion structure. Without that level of detail it is difficult to conclude that the proposal would preserve the character and appearance of the conservation area or sustain the significance of the locally listed building.

The submission should therefore be reinforced by a clear comparison between the existing and proposed windows, both in terms of section sizes and elevational appearance. This should include a measured assessment of the existing and proposed glazing bars, stiles, rails, meeting rails, mullions and transoms, together with annotated elevations demonstrating how the proposed subdivision, proportions and opening lights would compare with the existing arrangement. It should also be noted that the centre pivot arrangement appears to remain present at second-floor level and this should be reproduced as part of any acceptable replacement scheme.

Particular attention should also be paid to the opening arrangement. The visual character

of the elevation is not only derived from the material and colour of the frames, but also from the hierarchy and operation of the individual lights. A simplified opening arrangement or altered subdivision would risk eroding the architectural interest and consistency of the wider Arcade Buildings composition.

The proposal should therefore be approached on the basis that replacement may be acceptable in principle, but only where the detailed design is demonstrably exceptional and closely matched to the existing windows. The use of slim double glazing and improved performance frames can be supported where they do not compromise the external appearance, but Part L or building control requirements should not be allowed to drive a solution that would result in enlarged or visually heavy sections. Heritage flexibility may be available where necessary, and a more sympathetic steel or genuinely slender metal system may need to be explored if aluminium sections cannot achieve the required refinement.

The covering letter also refers to Building Control approval. This is noted, but Building Control approval addresses compliance with the Building Regulations and does not equate to acceptability in conservation terms. It does not displace the separate statutory and policy duties to assess the impact of the proposal upon the character and appearance of the conservation area, or the significance of Arcade Buildings as a locally listed building/non-designated heritage asset. The conservation assessment must therefore be based on the quality, accuracy and evidential support for the proposed replacement windows, rather than on the existence of Building Control approval.

On the information currently available, the proposal has not been justified in sufficient detail to demonstrate that the replacement windows would preserve or enhance the character and appearance of the South Street Conservation Area or appropriately sustain the significance of Arcade Buildings as a locally listed building. Further amended details and an adequate heritage statement should therefore be requested before the proposal can be supported.

Accordingly, while the replacement of the windows may be acceptable in principle, the current submission is insufficient to demonstrate compliance with the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the NPPF, and Worthing Local Plan Policies DM23 and DM24. In the absence of proportionate heritage assessment, clear existing and proposed comparison drawings, and detailed evidence that the proposed windows would preserve the architectural character of Arcade Buildings and the character and appearance of the South Street Conservation Area, the proposal cannot presently be supported and amended information should be sought.

Simon Richard
Conservation Consultant for and on behalf of Adur and Worthing District Council
Date of Comment: 20 July 2026