Conservation Officer Comments
Amended Plans or Further Details

Architectural & Historic Buildings Consultants
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Application Number:	AWDM/0613/25
Location:	11 High Street, Tarring, Worthing
Proposal:	Replacement window
Case Officer:	Amanda Haslett

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

Site and Surroundings:	Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when considering whether to grant listed building consent, to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when considering whether to grant planning permission, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." 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 appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. 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. The application site forms a 2 storey building under a slate roof appearing as a

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	early 19th century house. The front elevation is positioned immediately adjacent to the public footpath on the western side of Tarring High Street. The stucco elevation hosts a series of windows of sliding sash, fixed and casement types. It is noted that the sliding sash windows appear particularly elegant, lacking horns, being multipane type and occupy positions at both ground and first floor level. A cornice/facia arrangement is also present along some 2/3rds of the elevation. The southern side elevation shows some evidence of 20th century alteration including a minor extension and a rebuilt chimney. Tarring High Street is of notable architectural and historic interest and character hosting historic building of 16th to 19th century origins that include both polite and vernacular forms. Heavy timber framed buildings, sometimes obscured by 18th century modernisations sit comfortably beside stucco rendered and flint wall elevations. Being of a fairly consistent 2 storey arrangement the dwellings are densely arranged either side of a relatively narrow highway creating a sense of enclosure and modesty.
Drawing Errors:	
Comments:	The proposal seeks Listed Building Consent to replace a number of windows of both historic and contemporary origin with new timber windows with various opening methods to match existing, and the use of 16mm double glazing. The listing description briefly refers to a former use as a shop but the heritage statement provided does not assess significance or apportion significance to the windows that are proposed to be changed. Further to this the heritage statement does little to provide a suitable assessment of the building, simply referring to the listing description and a fairly generic statement regarding Tarring appearing in the doomsday book which written some 800 years prior to the construction of the building that is subject of the application and generally not relevant to the proposal. Where it is clear that window 4 for example carries little to no historic interest, the same cannot be said for window 1. Therefore, the principle of acceptability in respect of replacing the windows cannot be ascertained. It is noted that the use of timber will bring about a good quality item, however the use of 16mm double glazing will require increases in section size and given the extremely close proximity to the public footpath that increase in section size and glazing thickness will be clearly discernible and be of a jarring contrast with the existing arrangement on upper floors. The elegant and fine proportions so often characteristic of early 19th century joinery will be eroded in respect of original fitments. The replacement of contemporary units with modern replacements of matching pattern does not take opportunity to improve the character of the listed building or the character of the area.

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	Although Historic England Advice note 18 allows for more flexibility in terms of improving energy efficiency, it is not a one size fits all approach, with the retention of genuinely historic windows still being required. It is noted that the heritage statement is lacking any true analysis of each window. From the photographs provided window 1 appears to be of early 19th century origin with window 2 being some form of modern replacement and window 3 possibly infilling a previous door. Window 4 is a modern addition, with window 5 appearing to be of late 19th or early 20th century origin. Window 6 appears to be a somewhat altered window possibly using a mix of contemporary and historic components. In respect of local and national policy in particular policy DM24 of the Worthing Local Plan, it is considered that the increase in glazing thickness, and section sizes will adversely affect the aesthetic value of the listed building and the wider setting. Moreover both local and national policy allow for the mitigation of harm. Although Energy efficiency may be considered a public benefit in terms of tackling climate change it is noted that the same benefit can be achieved through other more sympathetic means, therefore there is no public benefit that is exclusive to this scheme. Similarly, in relation to the loss of genuinely historic windows; this has not been adequately justified within a Heritage Statement or Heritage Impact Assessment and based upon the limited detail provided, will cause less than substantial harm to both architectural and historic interest of the listed building with no justification. As such the proposal does not satisfy policy DM24 of the Worthing Local Plan, nor satisfy paragraphs 135, 167, 207, 213 or 215 of the NPPF. It is however noted and accepted that a scheme to either renovate and repair or indeed replace windows is required. It is suggested that the applicant thoroughly revise the application to provide: • A suitably detailed heritage statement and heritage impact assessment including detailed photographs of existing condition. The statement should also discuss the building chronological change over time, the originality of the windows proposed for replacement. • Revise the design of the proposed in order to maintain elegant proportions and suitable glazing thickness, and where possible provide enhancement in terms of opening method and design • Retain and repair genuine historic windows, providing a methodology for repairs.

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Further comment:	It is noted that the principle of replacing window 1 has been accepted by the council due to its deteriorated state. It is noted that window 1 is of historic interest and contributes to the aesthetic value of the building. The window is part of a consistent ensemble of original windows seen on the front elevation at 1st floor and ground floor. The joinery work on these windows is highly indicative of late 18th/early 19th century joinery being particularly elegant, utilising slim sections. The applicant has provided a proposed joinery detail that utilises inaccurate section sizes and detail when compared to the existing unit. The meeting rail most notably shows an increase of some 33% in section size, but other aspects including the bottom rail and the use of an ovolo moulding rather than lambs tongue are also notable. Although the council accepts the original windows replacement, the elegant section sizes utilised in the early 19th century are a clear point of architectural interest and these slim sections are repeated at 1st floor level creating a cohesive and consistent architectural character that contributes positively to the buildings aesthetic value. It is reasonable given the buildings historic status that replacement of existing historic windows should be accurate. Whereas the other windows proposed for replacement are modern, the use of larger section sizes would not constitute harm but would merely have a neutral impact upon historic and architectural interest, however the replacement of a historic window with a new window of inaccurate proportions would bring about harm to architectural interest and aesthetic value by way of detracting from the early 19th century characteristics, and disturbing the cohesion and consistency across this part of the elevation. This variation inn section size will lead to harm to the architectural interest of the building, the harm although less than substantial, is not mitigated by any form of public benefit or clear and convincing justification. If such section sizes could be achieved approx. 200 years ago there is no reason why poor replication should be accepted now, nor will the window proposed bring about any public benefit over that of one that is correctly detailed. At this point, and in order to move to a satisfactory conclusion the applicant should be invited to provide proposed joinery details of window 1 that match the existing detailing. Should these alterations not be forthcoming a refusal of Listed Building Consent should be issued on the basis of failing to satisfy policy DM24 of the Worthing Local Plan, and paragraphs 135, 207, 213 or 215 of the NPPF. .
Amended Plans / Additional Information Required:	1. 2.

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[List the amended plans/additional information you are requesting, if any]	3.
Conditions Required: [L*ist the conditions you are requesting, if any*]	1. 2. 3.

Simon Richard
Conservation Consultant – for Worthing and Adur District Council
Date of Comment 10/11/25