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From: **Huw James** <hjames@eceplanning.com>
Date: Thu, 10 Sept 2026 at 15:01
Subject: RE: AWDM/0811/26 - 13A Montague St
To: Louise Prew <louise.prew@adur-worthing.gov.uk>
Cc: Rebecca Hoad <RHoad@eceplanning.com>

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Dear Louise,

In relation to the request for a heritage statement, an appropriate planning and heritage statement has already been submitted. The NPPF requires a proportionate approach to addressing matters raised by proposals and the information submitted is appropriate and proportionate:

DM3: Determining development proposals b. Take a proportionate approach to the consideration of the planning matters raised by the proposals, in a way that reflects their scale, complexity and potential impact;

Your consultant has already prepared a statement of significance, and it is unnecessary for the Council to demand that we replicate this. As a statement of record, we agree with the majority of their assessment of heritage issues aside from their conclusion that any replacement windows must be of 'exceptional quality'. Achieving exceptional quality is not a requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF or the development plan.

In relation to the actual proposals, you noted previous approvals on the building and most recently AWDM/0095/26 has been approved for '*Replacement of Crittall windows at first and second floors on the front elevation*' at 10 - 11 Arcade Buildings. We note that the approved windows were Bereco W20 in width of profile. We have already explained in detail within our submitted statement that our client has gone to significant work to agree and now propose a slimmer W16 profile. This slim width is normally unacceptable to Building Control but we have sought dispensation and agreement with Building Control to the W16 profile in order to replicate the existing windows. The W16 has a slimmer profile and narrower visible sightline than the recently approved W20.

In response to the comments of your conservation consultant, the existing window elevations and sections are shown on our submitted drawing 4092-01B. For further information, I attach a copy of the submitted existing elevations of the adjacent 10 - 11 Arcade Buildings – they are exactly the same as the windows on our application site having been built and implemented at the same time. We trust this is helpful for your consultant to review.

The proposed windows are like for like and will match the existing glazing bar widths and details within the frame of the windows, depth and importantly the method of opening. They are a replacement of the decrepit crittall windows and represent a positive effect both in terms of the fabric of the building and a positive effect on the wider designated Conservation Area. HE6 requires that substantial weight should be given to an asset's conservation and the replacement windows are fundamental to this. There is no requirement to assess the scheme against HE6:4 as there is no harm occurring, only positive impacts upon the designated Conservation Area through long term conservation through the like for like window replacement; without replacement windows the building would further deteriorate and become a detractor from the significance of the asset.

In relation to then non designated asset, in this case, the building, the scheme should be supported as required by paragraph HE7:1:

HE7: Decisions on non-designated heritage assets

1. Development proposals which would have a positive effect on a non-designated heritage asset should be supported.

If the windows are not replaced, they will soon fall out, presenting an injury risk to pedestrians. Furthermore, the property owner will be unable to rent out the flat within, leading to dereliction as the tenants are growing increasingly frustrated at living in freezing conditions during the winter months as the windows are dilapidated with no insulation. There are clearly public benefits to be delivered through these proposals as well as the aforementioned positive impacts upon the heritage assets.

We note reference in the consultation comments to ‘*..a more sympathetic steel or genuinely slender metal system may need to be explored if aluminium sections cannot achieve the required refinement*’. Perhaps the Council (or your consultant) could comment on what the owner’s options are in this regard and recommend a suitable manufacturer? I have personally been trying to ask this question of Richard Small and the previous planning officer on multiple occasions since the previous refusal and no one has ever acknowledged or replied.

In summary, the proposals are a significant improvement on the decrepit existing windows and will have a positive impact on the Conservation Area and NDHA. They are an improvement upon the recently permitted windows at 10 - 11 Arcade Buildings and accordingly should be approved without delay.

Kind Regards,

Huw James
Director, MRTPI

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Planning committee decision-making is about to change significantly. [Find out how the National Scheme of Delegation could affect the way planning applications are determined from October 2026.](#)

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