# Development Control – Delegated Officer Report

**Application Number: AWDM/0811/26** **Recommendation: APPROVE**

**Site:** **13A Montague Street Worthing West Sussex**

**Proposal:** **Replacement of existing crittal windows on north elevation with powder coated black aluminium windows.**

**Last visited: 16/07/2026**

**Neighbours checked:** Y

**Additional neighbour notifications: N**

## 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 local interest building of considerable architectural merit built. The Royal Arcade is also part of this complex, built in 1925. The building 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.

## Proposal

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.

## Relevant Site History:

AWDM/0490/24: Replacement of existing Crittall windows at first and second floors to the north elevation Flat 1 and 2 with powder coated black aluminium. Refused 07/06/2024:

1. The proposed replacement of the original crittall windows with aluminium would, by reason of their design, material, glazing pattern and frame proportions undermine the architectural integrity of the building and represent a poor quality design that fails to replicate the existing windows or preserve the character of the building, having a significant and harmful impact on the visual amenities of the locality and South St Conservation Area. The proposal is therefore contrary to Policy DM5 of the Worthing Local Plan, Supplementary Planning Guidance 'Extending or altering your home' and the policies of the National Planning Policy Framework.

Ref: 08/0683/FULL – Approved – Aug 2008 Revised proposals for the conversion of & extension to upper floors to provide 2 one bedroom residential flats & 1 studio flat with alterations to implement the use including the formation of a new internal staircase & access to the rear part of the exiting ground floor shop premises (WB/08/0167/FULL)

Ref: 08/0167/FULL – Approved – April 2008 Conversion of & extension to upper floors to provide 2 one-bedroom residential flats & 1 studio flat with alterations to implement the use including the formation of a new internal staircase & access to the rear part of the exiting ground floor shop premises

**Consultations**

Worthing Society:
This property, circa 1925, is located within the South Street Conservation area and is recorded on the Councils Local Interest List, This Art Deco building forms part of the prominent Arcade Buildings estate and the Crittall windows are a particular period feature. We understand however that the windows have deteriorated.

I have now had the opportunity to discuss the proposed works with our Heritage Team and we appreciate the additional information provided by the applicant. We also have noted the further comments from the Conservation Officer in response to these details being provided.

We concur with his assessment that the replacement powder coated aluminium windows will be a suitable match to the original and will also complement the recently approved windows to be installed in the east facing façade.

In summary the Society has no objection to this Planning Application.

Heritage consultant – Simon Richard:

No objection - harm is negligible or mitigated

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/nondesignated 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 1011 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 'Crittal' 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. Crittal or not to Crittal, 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 metalframed 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.

*Additional comments following receipt of additional information*

The applicant’s further response and amended information are noted. The Council’s previous concern was not to impose an abstract or separate legal requirement for “exceptional quality”, but to ensure that the replacement windows would be of sufficient design quality, refinement and evidential support to preserve the character and appearance of the South Street Conservation Area and to sustain the contribution made by Arcade Buildings as a locally listed/non-designated heritage asset.

The additional information now submitted, including the existing window drawings and further proposed details, provides a clearer basis for comparison between the existing steel-framed windows and the proposed replacement system. It is also noted that the proposal now relies on a slimmer W16 aluminium profile, rather than the wider W20 profile previously approved elsewhere within Arcade Buildings, and that the applicant states that the proposed units would match the existing glazing bar arrangement, frame

depths, subdivision and method of opening. It is noted that the variation between the 2 types to be minimal and certainly not clearly discernible.

The increase in thickness to accommodate 16mm double glazing is accepted and will bring about some increase in energy efficiency which is considered to be a mitigating factor.

The use of aluminium in place of steel does not amount to a like-for-like replacement in strict material terms. However, the relevant heritage issue is whether the proposed replacement would preserve the external appearance, proportions, visual hierarchy and architectural rhythm of the existing fenestration within the wider façade.

On the basis of the amended drawings and the clarified specification, the proposed units appear capable of preserving the established character of the frontage, subject to the approved details being strictly secured and implemented.

Accordingly, the previous objection is withdrawn and no objection is raised on heritage grounds, subject to conditions.

The proposal is considered to accord with the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the heritage provisions of Section 20 of the NPPF, and the design objectives of the National Design Guide insofar as they seek well-designed development that responds positively to local character, identity and built form. The amended details are also considered to satisfy the relevant objectives of the Worthing Local Plan, including Policy DM24, by preserving the character and appearance of the South Street Conservation Area and sustaining the significance of Arcade Buildings as a locally listed/non-designated heritage asset.

*Officer's response: Further discussion was held with the conservation consultant regarding the change to the opening of the windows. It was recognised that while there was a reduction in the numbers of windows that could open this would not be a reason to refuse the application. Overall, the submitted window design is sufficient to preserve the appearance of the conservation area and local interest building.*

**Representations:**

None

**Relevant Planning Policies**

Worthing Local Plan policies (2023): SP1, SP3, DM5, DM16, DM24
National Planning Policy Framework (2026)
Planning Practice Guidance
Supplementary Planning Guidance 'Extending or altering your home'

**Planning Assessment**

*Principle*

There is no objection in principle to alterations to residential dwellings within the built-up area. The key considerations are the effects on the visual and residential amenities of the locality

*Visual amenity and impact on heritage assets*

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 20 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. Non designated heritage assets are also afforded weight in the planning balance as per policy HE7 of the NPPF.

As such, when considering the impact of a proposed development on the significance of a designated heritage asset, substantial 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 effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.

Policy DM5 outlines that all applications should be of high architectural and design quality and respect and enhance the character of the site and prevailing character of the area. This includes consideration of materials and detailed design.

This building forms part of a terrace which wraps around Montague Street into South Street and then into Marine Parade. The Royal Arcade is also part of this complex, built in 1925. These buildings have been identified by the Council as Local Interest Buildings and are also positive contributors to the character and appearance of the South Street Conservation Area.

The building is an attractive feature in the street scene that has retained its character through the preservation of the original Crittall windows. The building has a uniformity particularly along the Montague St and South Street elevations where they have retained their steel Crittall windows, although some have double glazed units.

The proposed windows have been altered from those previously refused. The increase in thickness to accommodate 16mm double glazing is accepted and will bring about some increase in energy efficiency which is considered to be a mitigating factor.

The use of aluminium in place of steel does not amount to a like-for-like replacement in strict material terms. However, the relevant heritage issue is whether the proposed replacement would preserve the external appearance, proportions, visual hierarchy and architectural rhythm of the existing fenestration within the wider façade.

It is noted that when existing window sections were requested, the agent provided existing window details from the planning permission granted earlier this year for replacement windows at Caffe Nero, 10-11 Arcade Buildings (ref AWDM/0095/26). It is likely that the windows have a similar appearance given they are in the same building. While these have been considered acceptable in this instance it is not considered best practice to provide details for alternative sites instead of the application site.

In terms of window opening, the original windows across the building appear to open on a central pivot as is the case at second floor. There have been windows within the building changed to a side hung casement window including the windows at first floor. The proposal would make use of this side hung casement for both floors. The corner windows are also traditionally openable whereas these elements would not be openable on the proposed windows. While the loss of the traditional opening method is a shame, it is considered to be acceptable on balance as appropriate frames have been secured which will provide the most benefit to the scheme to help preserve the appearance of the conservation area and local interest building.

In terms of the proposed units, they appear capable of preserving the established character of the frontage, subject to the approved details being strictly secured and implemented.

The two conditions secured on the Caffe Nero application will be added to this permission to ensure only those elements which are expressly granted permission are altered.

**Impact on the amenities of neighbouring occupiers**

There would be no change to residential amenity as the windows are in the place of existing windows.

**Recommendation**

**APPROVE subject to conditions:**

1. Approved plans
2. Standard time limit
3. Replacement windows in strict accordance with approved drawings
4. No removal, alteration, cutting back or replacement of any existing cast iron mullions, cast iron panelling, cills or other surround elements forming part of the window apertures,

**Informative:**

1. Approved following discussion

Is recommendation contrary to letter(s) of representation? N

Case Officer: Louise Prew Date: 06/10/2026

Authorised by: Jo Morin Date: 08.10.2026