Conservation Officer Comments
Amended Plans or Further Details

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Application Number:	AWDM/1321/25
Location:	8 - 9 Arcade Buildings South Street Worthing West Sussex
Proposal:	Change of use of first and second floor from food sales onsite (Class Eb) to two residential units (Use Class C3 with reconfiguration of shop front, window replacement to front elevation, window replacement and creation of new windows to rear elevation and rooftop photovoltaic panels
Case Officer:	**Louise Prew**

	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:	Arcade Buildings located in the South Street Conservation Area and which form an important element of the Royal Arcade redevelopment, opened in 1925. This reflected the inter-war development of the seafront during the Art Deco period. The Crittall windows were a distinct feature of this period and remain an important element of the façade. The Royal Arcade Buildings are included on the Council's Local Interest List and form an important corner opposite the pier at the junction of South Street with Marine Parade. The application seeks Planning Permission for the Change of use of first and second floor from food sales onsite (Class Eb) to two residential units (Use Class C3 with reconfiguration of shop front, window replacement to front elevation, window replacement and creation of new windows to rear elevation and rooftop photovoltaic panels. A site visit was conducted on 19th March 2026 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

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	will Local Policy.
Drawing Errors:	
Comments:	The introduction of a new use to the upper floors and a continuing use for the ground floor retail unit in principle is supported and will ensure ongoing viability of the building ensuring long term conservation and a positive economic position to ensure the viability of the wider conservation area. The inclusion of solar panels in this instance is acceptable as they are not visible from the public realm and therefore contribute to an increase in renewables without compromise of the conservation areas character and appearance. The objection and response by the Worthing Society and the agents respectfully are noted and it is agreed that the steel frame windows seen along the façade of the wider Arcade Buildings development do much to contribute to its character and its designation as a locally listed building. Indeed, it is also noted that a once in a generation opportunity for positive heritage outcomes is now presenting itself with a number of applications in respect of Arcade Buildings and its windows, including proposals round onto the Marine Parade elevation. 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 the applicants. 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. A locally listed building or non-designated heritage asset enjoys no protection under legislation but does warrant consideration under local and national policy. In both local and national policy, and legislation there is no requirement to preserve architectural and historic interest of the building as is usually required under Section 16 of the Act in respect of listed buildings. As such it is reasonable, based upon the information provided, to require a metal window that accurately replicates appearance, proportionality, sections and general design. These aspects clearly contribute to character and appearance which is protected by legislation and local and national policy.

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	In terms of the need to improve energy efficiency to meet building regulations, the use of slim double glazing and thermally broken frames will be considered but particular attention to the points raised above will still be required. Having reviewed the documentation, the proposed drawings are insufficient in terms of detail and 1:10 elevations and 1:2 horizontal and vertical sections area required showing a relationship with the surrounding aperture, facia panels and mullions as relevant. The drawings should also show annotations that the existing facia panels and mullions are to be retained. Whereas there is no objection in principle to the replacement of the windows, particularly where changing them will bring about an ongoing viable use for the upper floors, the quality and detail of the windows should be **exceptional** to ensure the preservation of the arcades consistent appearance and ensure the preservation of character and appearance. With reference to the proposed shop frontage the existing and proposed are of less interest but the requirement to preserve or enhance is still a requirement and as such the same level of detail is required. As such the applicant should be invited to make amendments
Further comment 18/5/26	The applicants have provided new drawings proposing the Alitherm Heritage window The typical section of the existing and proposed windows to the front elevation at first and second floor have been provided and it is noted that in the vertical section: The glazing bars are of very similar width (26mm to 25mm) but the proposed is essentially a stick on strip The transom and casement detail/junction on the existing is 75mm with the proposed at 88mm The top rail on the existing is 40mm with the proposed being 48mm The bottom rail of the existing is 40mm with the proposed 58mm. In horizontal section shows: The existing stiles at 35mm with proposed at 46mm The mullion junction of the existing is some 41mm with the proposed being 102 mm It is also noted that the sections do not adequately or clearly show the correct detail in terms of the frame and the sash that in totality form a casement. This is particularly notable on the sections of the existing where one simple 32mm section possesses no hinge or detail to show it opens, or in the case of the vertical shows a fixed rail at the bottom but a top

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	rail located into the frame transom. It is also noted that the sections are not full sections showing the proposed in its entirety or at least at all detail points. The sash component of the proposed appears to lap over the hosting frame creating a storm seal style finish similar to what is seen on upvc windows. Whereas some section sizes appear to fall into the realm of acceptability others are of a greater size, providing between 25% and over 100% increase in size. The agent discusses the comparison between the Crittall T60 and the Alitherm, but does not effectively discuss the comparison between the **existing and proposed**. It is noted that Crittal T20 and the existing both possess 32mm sections. Whereas the agent is correct to refer to my previous comment regarding the potential acceptance of thermally broken or double glazed units, my comment also made clear that the appearance of the window would still be considered, by implication stating that thermal performance would not be a mitigation for harm, particularly as some improvement can be achieved through sympathetic design. The thickness of the double glazing should also be reviewed and proposed thicknesses should be more sympathetic to heritage requirements The proposed by way of excessive bulk brought about by the adverse impact of cumulative swollen section sizes within the proposed glazing detail would not preserve or enhance the character of the conservation area or this locally listed building. It is strongly suggested that the applicant seeks advice from the Steel Window Association as to the most suitable approach. The applicant should also be aware of the requirements of Part L can be relaxed in areas of heritage interest and whilst it may not be possible to meet the full requirements of part L, significant improvement can still be made. The council will provide details of the heritage sensitivity of the site if required by building control in order to allow this flexibility. The applicant should also fully review the drawings to ensure they are adequate and reflective of the design of the existing and proposed. In respect of the ground floor, vertical sections of the shop and residential entrance are required. The windows to the rear acceptable as out of public view
Follow up comment 9/9/26	Following a telephone discussion in June the agent was advised the following by email: *Just to confirm, following our discussions I accept that unlike the rest of the terrace 8-9 possesses fixed windows and the introduction of side hung opening windows is accepted and will result in an increase in total section size due to requiring the main frame and the frame of the sash to form the new window.*

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	However, I still note that the sections sizes are still large in some respects, and glazing to be very thick and as such a review should be carried out to consider other options. *I accept that you have 2 opposing issues to address, one being the requirements of building regulations and potentially MEES and the other being the character and appearance of the conservation area and locally listed building.* *In the interests of moving forward, a more traditional section arrangement utilising 12mm - 18mm double glazing similar to a Crittal W20 would be a move in the right direction, as I detailed in previous comments the use of the brand crittal is not necessary providing the style is adequately reflected.* *I have already advised that I am prepared to write a letter confirming any shortfall in compliance in building regulations to be mitigated by the requirements to preserve character and appearance.* *However in respect of MEES I note that there is no such allowance, however the requirement for an EPC of C is not proposed to come into force until 2030, with a review of the assessment procedure outlined for 2029 (https://www.gov.uk/guidance/domestic-private-rented-property-minimum-energy-efficiency-standard-landlord-guidance)* *As it stands the requirement is for a minimum of a E rating, and whilst I am prepared to give some very limited weight to potential future requirements, this requirement is ultimately not in force at this time. I also note there are other exemptions such as the high cost exemption that would negate the need for further works should the increase in EPC requirements actually occur.* *I note that EPC's are a holistic review of energy efficiency so therefore where efficiency is not as high as it could be in some areas (windows for example) it can be made up by greater efficiency in other areas.* *If your review ultimately concludes in the proposed being unaltered you would be introducing a degree of less than substantial harm by way of the section sizes and glazing thickness that may be mitigated under paragraphs 213 of the NPPF but the evidence to mitigate that harm, without reservation, should be clear and convincing. Although it is up to you as to what case you put forward, projected EPC ratings would demonstrate the efficiency of the new units in a holistic manner and give the LPA a clear view of why a bulkier arrangement is necessary, comparative u-values would also be helpful. To be clear, simply saying that you have investigated and you cant find better is not clear and convincing, the case should be evidenced*

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	I also advise as Im sure you are aware, the RdSAP assessment process should be used. *Finally, the council ultimately have the power of decision making in accordance with local and national policy, where DGC provide heritage advice to Adur and Worthing, the Planning Officer will make the final recommendation considering all planning matters* The further information submitted by the applicant is noted, including the forecast EPC reports comparing the performance of non-thermally broken steel double-glazed windows with thermally broken double-glazed units. These reports indicate that the non-thermally broken option would result in both the first and second floor flats achieving a forecast EPC rating of D/67, whereas the proposed thermally broken option would result in forecast ratings of C/69 for the first floor flat and C/74 for the second floor flat. Those reports therefore provide useful evidence that the proposed window specification would deliver a measurable improvement in the overall energy performance of the proposed residential units. However, no amended fenestration details appear to have been submitted in response to the earlier conservation concerns. The concerns previously identified therefore remain. In particular, the proposed windows continue to raise concern in heritage terms by reason of the variation in appearance from the established steel-window character of the Arcade Buildings, the increased cumulative section sizes, the overly bulbous appearance of some sections, and the loss of finesse when compared with the more slender steel fenestration that contributes positively to the character and appearance of the building and the wider conservation area. It is acknowledged that the National Planning Policy Framework has been updated since the earlier comments were prepared. The August 2026 Framework now provides stronger policy support for energy-efficiency improvements to existing buildings. In particular, Policy CC2 states that substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from renewable and low-carbon sources where this would be achieved through proposals for development. As such, the energy-efficiency benefits evidenced in the submitted forecast EPC reports are a material consideration to which substantial weight may reasonably be afforded in the planning balance. Notwithstanding this, the heritage policy position also remains material. The Arcade Buildings are included on the Council's Local Interest List and therefore constitute a non-designated heritage asset. Policy HE7 of the August 2026 NPPF states that, where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset. The proposal is considered to result in a degree

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	of harm to the significance of the locally listed building, arising principally from the altered appearance, increased section sizes and less refined fenestration detail. In addition, by reason of the overly bulbous nature of elements of the proposed fenestration, together with the cumulative increase in frame, sash, mullion and glazing-bar sections, the proposal is also considered to result in some harm, being less than substantial harm, to the character and appearance of the South Street Conservation Area, which is a designated heritage asset. Policy HE6(1) of the August 2026 NPPF states that, when considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation, irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm or total loss of significance. Policy HE6(4) further provides that, where a development proposal would harm the significance of a designated heritage asset, the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal, and that important public benefits can include enabling energy efficiency and low carbon heating measures to be employed. In conclusion, the additional EPC evidence strengthens the applicant's public-benefit case, particularly having regard to the substantial weight now afforded by Policy CC2(2) to the benefits of improving the energy efficiency of existing buildings. However, the submitted information does not remove the identified heritage harm, nor has any amended fenestration design been provided to address the detailed concerns previously raised. The August 2026 NPPF therefore requires two matters of substantial weight to be brought into the planning balance: the substantial weight to be given to the conservation of the South Street Conservation Area as a designated heritage asset under Policy HE6(1), and the substantial weight to be given to the energy-efficiency benefits of the proposal under Policy CC2(2). It will therefore be for the case officer, as decision-maker, to determine whether the harm caused to the locally listed building and the less than substantial harm caused to the character and appearance of the conservation area are outweighed by the substantial weight to be given to the energy-efficiency benefits of the proposal when undertaking the overall planning balance.

Simon Richard
Conservation Consultant for and on behalf of Adur and Worthing District Council
Date of Comment 23/3/26