

1 July 2026

Worthing Borough Council Planning
Worthing Town Hall
Chapel Road
Worthing
BN11 1HA

PG/Let/P2383

Dear Sir/Madam,

REPLACEMENT OF EXISTING CRITTALL WINDOWS AT FIRST AND SECOND FLOORS TO THE NORTH ELEVATION FLAT 1 AND 2 WITH POWDER COATED BLACK ALUMINIUM at 13a Montague Street, Worthing, West Sussex, BN11 3AX.

This covering letter has been prepared by ECE Planning on behalf of Geneva Investment Group Ltd in support of Full Planning Permission for the replacement of existing Crittall Windows with powder coated black aluminium, on the north elevations of Flats 1 & 2 at 13a Montague Street.

The application for Full Planning Permission is supported by the following documents and drawings. These drawings should be read in detail alongside the application and are as follows:

- **Application form**
- **Covering Letter**
- **4092-01b**
- **4092-loc**
- **Sample Drawings - SMW KD2088 (Cross-sections)**

The Site

The site is a three-storey building located in central Worthing on Montague Street, to the east of Worthing Town Centre and resting within the built-up area boundary and the South Street Conservation Area.

The windows are connected to Flats 1 & 2, on the first and second floor respectively, sitting above a nail salon on the ground floor. The flats are accessible via a side entrance adjacent to the ground floor business.

The building has painted rendered walls to the upper floors with ornate detailing in the form of quoins, cornice & corbels. The majority of the front wall is taken up with double height black Crittall windows with cast iron posts and mid panel which overlook Montague Street. At ground floor level is the double fronted shopfront business.

Along with much of southern Worthing, the site also lies in Flood Zone 3 due to the proximity to the sea, however this would have no relation on the development due to the windows being located on the first and second floor.

Relevant Planning History

The site has a previous application for the replacement of the windows which was refused in June 2024 under reference AWDM/0490/24. However, the applicant has since received building control approval in May 2026 for the use of FABCO powder coated aluminium windows under application number AWBC/0528/26.

The Proposal

The proposal is for the replacement of the existing Crittall windows on the first and second floor with Fabco powder coated aluminium windows.

This development is being put forward because the current windows are not fit for purpose, they are decrepit, and are in need of replacement. After decades of use the windows have become draughty, corroded and impossible to maintain. Furthermore, the current windows are unable to provide the sound and thermal performance required of modern windows. The properties are rental flats with a high energy efficiency rating required which is not possible to achieve with the existing Crittall windows.

The proposed windows have been improved from those the proposed in 2024. It is now intended that the new windows will be replaced with slim 16mm Fabco powder coated aluminium windows. The new aluminium system proposed replicate the slim sightlines and steel-look aesthetic of the originals while delivering the performance, security and energy efficiency now required of residential properties. The proposed SMW section is slim to replicate the original appearance at 16mm and is a double-glazed sealed unit.

The proposed windows are of high-quality design, which have been previously assessed and approved by Building Regulations (reference: AWBC/0528/26). Furthermore, the new windows adhere to the original aesthetic while improving the homes.

Planning Policies

The proposals fully comply with the Worthing Development Plan.

The Worthing Local Plan (2023) Policy SP3 requires that new developments in Worthing are designed to promote healthy, inclusive and safe living environments. Within this policy is the requirement that new developments must provide high quality and energy efficient homes within an attractive environment.

The proposed development meets these criteria by providing windows with more efficient windows, with improved insulation over the old Crittall windows allowing for better insulation. Along with this, the higher quality windows will improve the energy efficiency of the homes, which will reduce energy demand and improve the comfort of current and future occupants. These proposals therefore clearly promote the living standards of the occupants and fully comply with Policy SP3.

Policy DM16 'Sustainable Design' outlines the guidelines that new developments need to move towards reducing their carbon footprint, prevent overheating, and minimise waste.

Similarly, the development will comply with Policy DM16 by providing much needed energy saving measures for the two homes. Considering that the old windows are draughty and inefficient, the replacement windows will be a much greater improvement for residents, and the viability of the replacement windows has already been demonstrated through recent Building Regulations approval.

Policy DM24 - 'The Historic Environment' of the Worthing Local Plan requires that any harm to a designated heritage asset be weighed against the public benefits of the proposal, while Chapter 16 of the National Planning Policy Framework (NPPF) sets out strict guidelines for conserving and enhancing the historic environment, requiring that great weight be given to the conservation of designated heritage assets. The Supplementary Planning Guidance - 'Extending or altering your home' provides guidance on keeping the character of developments in line with the existing site and surrounding area.

The proposed replacement windows are considered acceptable from a conservation standpoint and fully comply with these policies. The original Crittall windows are to be replaced with a design of very similar appearance, preserving the historic aesthetic of the building and the wider conservation area. In addition, the distinctive steel engravings between the first and ground floor windows will be retained, further safeguarding the building's unique character. The proposal fully complies with these policies and results in no harm to the appearance or significance of the heritage asset, no impact on the character of the surrounding area, and no loss of amenity. It is therefore considered wholly acceptable and should be permitted.

Also of particular importance, Policy DM5 'Quality of the built environment' of the WLP provides the guidelines for the design quality of new developments, with proposals expected to meet high standards of architecture and design, form & layout, while respecting the existing character of the area.

The proposed development fully adheres to this policy, the new windows are of excellent quality and design, and incorporate premium materials that improve energy efficiency. Furthermore, the aesthetics of the windows have been carefully selected to mimic the old windows and blend with the wider street scene. The proposed window replacements improve the flats, while preserving the character of the street, which aligns with Policy DM5.

The previous application for replacement windows (ref: AWDM/0490/24) was refused primarily due to non-compliance with Policy DM5, the policies of the NPPF, and the SPG 'Extending or Altering Your Home'. In response, the replacement windows have been carefully selected to ensure they integrate seamlessly with the existing property, respecting and enhancing the character and setting of the building in accordance with these policies. Building Regulations approval has been secured to further demonstrate the suitability of the proposed windows.

Conclusion

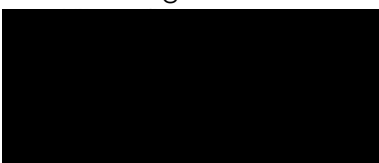
The proposal is considered to be acceptable, providing the suitable replacement of worn and decrepit windows. The improvement to the energy efficiency of the properties is considered to positively improve the living standards of current and future residents. There will also be no change to residential amenity, as noted in the officer's report of the previous application.

The proposal represents a high-quality design, with a materials palette which retains the original aesthetic of the original windows and the local area. The materials, form and appearance have been carefully considered and proactively approved through Building Regulations to fully comply with the policies set out in the Worthing Development Plan and the NPPF.

For these reasons, it is considered that development should be permitted.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning



Huw James MRTPI
Director