



Arun District Council
Arun Civic Centre
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Arun District Conservation Area Advisory Panel
c/o Civic Centre

4th May 2021

Dear Sir/Madam,

Case Officer: Mrs A Gardner
Telephone: 01903 737529
Email: Anita.Gardner@arun.gov.uk

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application No: AB/49/21/PL
Site Address: Old Bank House 1 High Street Arundel BN18 9AD
Description of works: Replacement of all windows with new timber double glazed sliding box sash windows and the proposed rendering of the South Elevation (front) and the West Elevation (side) with render painted white. This application may affect the setting of a Listed Building and affects the character and appearance of the Arundel Conservation area.

Thank you for your internet representation made on 2nd May 2021 which has been recorded as an objection with the comments as follows:

OWPC35662

At three stories in height and located on a corner site the building is extremely prominent in the Arundel townscape, not only as viewed from the public gardens and riverside opposite but also from the river bridge.

The building dates to the late 18th or early 19th Century and its Georgian townhouse style means that its traditionally constructed multi-paned vertically sliding sashes are critical to its design and make a considerable contribution to its heritage significance.

The replacement of this important fenestration with timber double glazed windows with their thicker glazing, dead flat appearance to the glass and thermal spacers will materially detract from the historical and architectural significance of this listed building. It is difficult to ascertain from the submitted plans how any glazing bars, if any, will be treated. It is either intended to use false 'stick on' bars or to use properly formed bars but these would need to be thicker than the originals in order to take the extra weight of the double glazing (this would also likely be the case even with slimline glazing units). Either detail is simply not appropriate since the existing traditionally constructed slender glazing bars are so important to the character and appearance of the historic building.

The wholesale replacement of the existing windows represents a substantial loss of historic fabric. The nationally accepted approach is that repair should be explored first before the decision to replace and there is ample advice given by Historic England in its various publications. This issue is not addressed in the Heritage Statement. Considerable advice is also given by Historic England on the various methods of thermally insulating historic buildings without recourse to double glazing.

Without detailed proposed full elevational plans of the various window sizes contained in the building it is difficult from the plans submitted to ascertain final appearances.

In any event, the works of replacement with double glazed units are totally unacceptable and permission

should be refused.

Government Guidance on the Historic Environment indicates that there can be cases where even minor works can give rise to substantial harm to heritage assets for the purposes of paragraphs 194-196 of the NPPF. The Panel's view is that given how critical the appearance of the existing windows are to the heritage significance of the building there will be substantial harm. Even if it is considered that the works give rise to less than substantial harm the only possible public benefit which could be considered would be the better thermal insulation of the building but as mentioned before there are other, far more appropriate, ways of achieving this without recourse to double glazing.

The proposed works will undoubtedly adversely affect the character and appearance of the building and so, too, that of the conservation area. If permission is granted there will be a dangerous precedent for other such works not only within the Arundel Conservation Area but in historic buildings across the District giving rise to a major adverse impact on its historic environment. The works fail to comply with the relevant paragraphs of the NPPF and policies contained in the ADLP relating to the protection of designated heritage assets. cont/see second submission

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to planning@arun.gov.uk and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at [:https://www.arun.gov.uk/planning-decision-process](https://www.arun.gov.uk/planning-decision-process).

Some applications will be determined by the Development Control Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/weekly-lists>

Any comments that are received after the agenda has been finalised will be separately reported to the members of the Development Control Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



Neil Crowther
Group Head of Planning

For details of how the Council will deal with your data please refer to our privacy notices on the website www.arun.gov.uk/planning-privacy-statements

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.

To register to receive notification of planning applications in your area, please go to <https://www.arun.gov.uk/planning> and click into Local Planning Application Finder.