

Design, Heritage & Access Statement

Proposed replacement of shop front windows/doors and window at side elevation.

56_Lower Street_Pulborough_RH20 2BW

On Behalf Of:

Mr Hennings

Prepared By:

O. UNDERWOOD



28 Galsworthy Road, Goring-by-Sea, West Sussex, BN12 6LW

T: 01903 357034

W: www.highcroftdesigns.co.uk

1. Introduction

This Design, Heritage and Access Statement has been prepared on behalf of Mr Hennings in support of a planning application for the replacement of the existing timber shop window frontage and entrance doors and the replacement of a single timber casement window at the side (gable) elevation of the commercial premises at 56 Lower Street, Pulborough, West Sussex, RH20 2BW. The property operates as a florist and is known locally as The Flower Shop, Pulborough.

The existing fenestration across both the main frontage and the side elevation is constructed of painted timber. Due to its age and exposure, the fabric of the existing joinery has deteriorated and can no longer adequately serve the security, thermal performance or commercial requirements of the business. The proposed replacement units are to be fabricated in powder-coated aluminium, finished in Anthracite Grey (RAL 7016), and will be installed using the Smart Architectural Aluminium Shopline system (main frontage) and the Smart Alitherm 400 Casement system (side elevation).

The proposal retains the existing composition and format of the frontage in all material respects: double entrance doors with sidelights to either side, and the subdivision and positioning of the side casement window. The change is primarily one of material and finish.

This statement has been prepared with reference to the following key documents:

- National Planning Policy Framework (NPPF), December 2024
- Horsham District Planning Framework (HDPF), November 2015
- Pulborough Conservation Area Appraisal and Management Plan (Horsham District Council, January 2018)
- Sussex Extensive Urban Survey (EUS): Pulborough Historic Character Assessment (October 2004)
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management (2016)

2. Site Description and Context

2.1 The Application Site

No. 56 Lower Street is a single-storey, single-fronted commercial premises situated on Lower Street in Pulborough, West Sussex. The building is simple in form, presenting a flat front elevation to the street with a centralised timber shop frontage incorporating double entrance doors and sidelights. To its west, the front elevation is flanked by an open gable (side) elevation, which contains a single horizontal casement window positioned towards the centre of that wall.

The surrounding brickwork is painted subtle shade of pink, and the existing joinery is painted in a deep burgundy red. The property operates as an active florist, with goods displayed externally and on shelving units either side of the entrance. There is an awning above the entrance canopy. A car parking space is located immediately to the west of the building.

2.2 Heritage and Conservation Context

The application site lies within the Pulborough Lower Street Conservation Area, and is subject to the updated Pulborough Conservation Area Appraisal and Management Plan adopted by Horsham District Council in January 2018. The Conservation Area Appraisal describes the Lower Street character area as having a predominately two-storey built form along Lower Street, with a mixed land use character: shops and commercial premises fronting onto the street with residential areas above and behind.

No. 56 is not a Listed Building, however the building is identified in the Sussex Extensive Urban Survey (EUS) as having historical value. The EUS, undertaken in October 2004 and funded by English Heritage, identified Pulborough as having significant survivals of historic urban character. The EUS designation means that the building makes a positive contribution to the historic environment of the conservation area, and consequently any alterations are appropriately considered under the policies governing designated heritage assets and their settings.

The building sits between no. 54 Lower Street (which also has historical value per the Sussex EUS but is not listed) and no. 58 Lower Street, which is a Grade II Listed Building. Further Listed Buildings in the immediate vicinity include:

- Nos. 73, 75 and 79 Lower Street: Grade II Listed (List Entry 1027345) — C15 timber-framed Wealden house
- No. 50 Lower Street: Grade II Listed (List Entry 1027348) — C17 property
- The White Cottage: Grade II Listed (List Entry 1354011) — C17 property
- Pulborough House: Grade II Listed (List Entry 1193731) — C17 or earlier with C18/C19 shop window below projecting cornice
- Lloyds Bank: Grade II Listed (List Entry 1027349) — Early C19
- The Oddfellows Arms: Grade II Listed (List Entry 1354009) — C17 or earlier

The property was purchased by the current owner, Mr Hennings, in circa 2004. The purchase was understood at that time to be in part motivated by a desire to prevent inappropriate development of the site, which had previously been subject to interest from a developer proposing flatted development on the site and its curtilage.

3. Existing Condition of the Fenestration

3.1 Main Shop Frontage

The existing shop frontage comprises a timber-framed double door set with sidelights. The joinery is painted in a deep red/burgundy colour consistent with the overall colour scheme of the building. Figure 1 records the current condition of the frontage.



Figure 1

Timber joinery in commercial settings of this nature is inherently more demanding to maintain than in residential use. Heavy pedestrian use, exposure to the elements, and the practical requirements of an active retail business — including deliveries, regular opening and closing cycles, and seasonal external displays — place considerable stress on painted timber frames and glazing rebates. Consequently there is visible paint failure, weathering and wear at multiple points on the frame. Timber joinery of this age and exposure profile requires constant and expensive maintenance to remain serviceable.

The security performance of the existing frontage is also a material consideration. The existing timber construction does not meet current commercial security standards. As a standalone retail business, the property requires robust security provision, and the inadequacy of the existing timber frame in this regard represents a genuine operational concern for the business owner.

3.2 Side Elevation Window

The side (gable) elevation of the property contains a timber-framed two-light window comprising a narrow horizontal top-hung ventilator/fanlight over a larger fixed glazed light. The window is painted in the same deep burgundy as the main frontage. Figure 2

shows the current condition of this window, including visible weathering and deterioration of the frame and paintwork. There is also evidence of moss and organic growth on the window sill and between glazing units.



Figure 2

As with the main frontage, timber casement windows in this exposed position require regular maintenance. The existing condition demonstrates that the current window has reached a point where replacement rather than repair represents the most practicable, economical and long-term appropriate course of action.

4. Description of the Proposed Works

4.1 Main Shop Frontage — Smart Shopline System

The proposed replacement frontage will be fabricated using the Smart Architectural Aluminium Shopline system. Smart Architectural Aluminium is an established and

recognised UK manufacturer of aluminium window and door systems, holding Council for Aluminium in Building (CAB) membership and accreditation from the Centre for Window and Cladding Technology (CWCT). The Shopline system is specifically designed for commercial applications including high-traffic retail environments.

The proposed frontage will replicate the existing composition:

- Double entrance doors, centrally positioned, with sidelights to either side
- Overall width and height consistent with the existing opening and frame dimensions

The system uses mechanical corner brackets rather than welded joints, producing a high-quality finish with consistent joint quality. All profiles are extruded from aluminium alloy 6063 T6 in compliance with BS 1474, and the powder coat finish is applied in accordance with BS 6496 to Qualicoat standards at a minimum of 60 microns, providing an expected service life well in excess of 25 years without the maintenance demands of painted timber.

The finish proposed is Anthracite Grey (RAL 7016) powder coat. This is a muted, recessive colour that will read as a dark, neutral tone against the painted brickwork of the building. It avoids the bright or reflective finishes that would conflict with the historic character of the conservation area. The existing red/burgundy colour scheme is a decorative overlay applied to the timber; it is not a historic feature of the building fabric itself. Anthracite Grey achieves a similarly dark, composed visual effect appropriate to a commercial frontage in a conservation area setting.

4.2 Side Elevation Window — Smart Alitherm 400 Casemen

The proposed replacement side elevation window will be fabricated using the Smart Alitherm 400 Casement system. The Alitherm 400 series is a thermally broken aluminium casement window system designed for both commercial and residential applications, offering high performance in respect of thermal efficiency, weather resistance and security.

The proposed window will replicate the format and proportions of the existing window: a painted finish timber, two-light window with a top-hung opening fanlight over fixed glazed light. The finish will be Anthracite Grey (RAL 7016) powder coat, consistent with the main frontage, providing visual coherence across the building's fenestration.

The Alitherm 400 system exceeds current building regulation requirements for thermal performance, providing a meaningful improvement on the single-glazed and early double-glazed performance of the existing timber unit. This improvement in thermal performance also provides an incidental benefit in terms of reducing heat loss and the building's energy consumption.

5. Relevant Planning Policy and Assessment

5.1 National Planning Policy Framework (NPPF) December 2024

Section 16 of the NPPF sets out the national policy framework for conserving and enhancing the historic environment. The following paragraphs are of particular relevance:

- **NPPF Para. 212** 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.
- **NPPF Para. 215** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- **NPPF Para. 220** Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The application site lies within a designated conservation area. No. 56 is not a Listed Building, and the proposed works do not affect the fabric of the building beyond the replacement of fenestration within the existing openings. As the proposed replacement windows and door replicate the existing composition in terms of scale, arrangement and proportions, and as the Anthracite Grey finish is a muted, non-reflective colour appropriate to a commercial setting, the harm to the significance of the conservation area, if any, is at the very lowest end of the less-than-substantial spectrum.

Against this, the public benefits of the proposal are to be considered: the works secure the continued viable commercial use of an active business within the conservation area; they address legitimate security concerns; they improve the thermal and weathering performance of the building envelope; and they will result in a well-maintained, consistently finished frontage for a period of at least 25 years, reducing the risk of future deterioration. A compromised frontage would be significantly more detrimental to the character and appearance of the conservation area than a well-maintained aluminium frontage in a muted colour.

5.2 Horsham District Planning Framework (HDPF) November 2015

The HDPF was adopted by Horsham District Council on 27th November 2015 and remains the operative local planning framework. The following policies are directly applicable:

Policy 14 — Shop Fronts and Advertisements

Policy 14 of the HDPF addresses shop fronts and advertisements. Planning applications for shop fronts within conservation areas are expected to have regard to the character and appearance of the conservation area and the host building. The policy supports the retention and sympathetic replacement of shop front elements, with particular reference to design quality, materials, and relationship to the building as a whole.

The proposed replacement frontage responds to Policy 14 in the following respects:

- The design replicates the existing arrangement of entrance doors, sidelights, maintaining the traditional composition of the shop front
- The Anthracite Grey finish is muted and recessive, avoiding bright corporate colours or reflective finishes that would conflict with the historic character of the area

Policy 32 — The Quality of New Development

Policy 32 requires that new development makes a positive contribution to local character and distinctiveness. The proposal respects the scale, proportions and character of the existing building and the surrounding streetscape. The replacement fenestration is designed to be proportionate to the existing openings, visually coherent across both elevations affected, and of a quality and durability appropriate to a commercial premises within a conservation area.

Policy 33 — Development Principles

Policy 33 requires that development does not have an unacceptable impact on the amenity of the surrounding area, and that it is of appropriate design quality. The proposal introduces no change to the footprint, massing or use of the building. The visual change is confined to the replacement of fenestration, which is modest in its impact and managed through the choice of a muted finish and a system that closely replicates the profile dimensions of the existing joinery.

Policy 34 — Heritage Assets and Managing Change within the Historic Environment

Policy 34 requires that development affecting heritage assets (designated or otherwise) conserves or enhances their significance. No. 56 is identified in the Sussex EUS as having historical value, and as such constitutes a non-designated heritage asset in planning policy terms. The NPPF (Para. 220) addresses the loss of an element making a positive contribution to a conservation area, confirming this should be treated as either substantial harm (Para. 214) or less-than-substantial harm (Para. 215), depending on the degree of impact.

However, it is submitted that the current proposal does not constitute such a loss. The significant contribution of No. 56 to the Lower Street Conservation Area derives from its historic form, its continued commercial use, and its active, well-maintained frontage. None of these are diminished by the proposed works. On the contrary, the replacement of deteriorating timber joinery with a high-quality, durable aluminium system in a sympathetic finish actively maintains those attributes of the building that contribute to the conservation area's significance.

5.3 Pulborough Conservation Area Appraisal and Management Plan (January 2018)

The Pulborough Conservation Area Appraisal and Management Plan, adopted by Horsham District Council in January 2018, describes the character of the Lower Street Conservation Area. The Appraisal notes that the dominant land use along Lower Street is mixed, with shops and commercial premises fronting the street with residential areas above and behind, and that the scale of buildings is predominantly two-storey cottages under pitched clay tile roofs, with the western end of the area having smaller, more densely packed plots.

The Appraisal identifies the special interest of the conservation area as deriving in part from the survival of historic urban form and the continued activity of commercial frontages along Lower Street. An active, well-maintained commercial frontage (such as the continued use of No. 56 as a florist) is itself a positive contribution to that special interest. The Management Plan should therefore be read as supporting, rather than opposing, works that enable the continued commercial viability of such premises.

The Appraisal also identifies negative elements within the conservation area, including instances of unsympathetic alteration and inappropriate materials. The Applicant is alert to this and has accordingly selected a system and finish (the Shoplevel aluminium system in Anthracite Grey) that is muted, well-made, and appropriate in character to a commercial premises in this setting. The proposal avoids the characteristics that the Appraisal identifies as negative: it introduces no large plate glass expanses without subdivision, no bright or corporate colour, and no loss of the traditional proportional arrangement of the frontage.

6. Planning Precedent

Reference is drawn to the approved planning application DC/21/0596, which granted consent for the replacement shop front with awning at 81 Lower Street, Pulborough. No. 81 Lower Street lies within the Pulborough Lower Street Conservation Area. The approved scheme at No. 81 involved the replacement of the existing shop front with new fenestration broadly comparable in type to the proposal at No. 56.

The Applicant acknowledges that No. 81 does not carry the specific EUS historical value designation that applies to No. 56. The precedent is therefore not relied upon as a direct equivalence, but is submitted as evidence that Horsham District Council has considered and approved replacement shop front fenestration within the Pulborough Lower Street Conservation Area in the recent past. This confirms that the principle of replacing shop fronts in this conservation area setting is established and acceptable in planning policy terms, subject to appropriate design consideration.

The present proposal meets a higher evidential threshold than was required for DC/21/0596: the EUS designation of No. 56 has prompted closer attention to the design quality and appropriateness of the proposed system and finish, which are addressed in detail throughout this statement and supported by the manufacturer's technical documentation submitted with this application.

7. Design Response and Heritage Impact Assessment

7.1 Significance of the Heritage Asset

The significance of No. 56 Lower Street, as a non-designated heritage asset identified by the Sussex EUS

No. 56 Lower Street falls within HUCA 2 — Lower Street East, which the EUS assigns a Historic Environment Value (HEV) of 4 out of 5, the second highest rating in Pulborough's assessment. The EUS describes HUCA 2 as representing "the distinct settlement nucleus that emerged in the 17th and 18th centuries and that, during the 19th century came to supplant the earlier village core around the church," noting that today

"this length of Lower Street is almost continuously built up, and is the main shopping area." The EUS records 15 unlisted 18th and early 19th-century locally important historic buildings within HUCA 2; No. 56 is among these.

The EUS explicitly identifies vulnerability in HUCA 2 as high, citing in particular the threat of "internal and shop-front refitting of business premises, minor structural additions, and occasional rebuilding of non-listed buildings" as "constant and continuing threats to buildings and archaeology." It also warns that locally-important historic buildings are "vulnerable to neglect and conversion to residential use, the latter also undermining the commercial character, or function, of this part of the town." This passage is directly material to the present proposal: the EUS identifies the commercial function of Lower Street East as something worth protecting in its own right, and any works that enable the continued viable commercial occupation of No. 56 — including the replacement of deteriorating fenestration — actively serve the conservation objectives the EUS sets out.

In accordance with NPPF Paragraph 207, which requires that significance be described using appropriate expertise and at a level of detail proportionate to the asset's importance, the significance of No. 56 as a non-designated heritage asset within HUCA 2 is assessed as follows, drawing on the EUS, the Pulborough Conservation Area Appraisal and Management Plan (Horsham District Council, January 2018), and direct site observation as recorded in the photographs submitted within this application:

- Its contribution to HUCA 2 as one of the 15 locally important unlisted historic buildings identified by the EUS within the Lower Street East character area, which carries the second highest Historic Environment Value rating
- Its continued active commercial use as a retail business, which directly sustains the commercial function and character of Lower Street East that the EUS identifies as a core attribute of the area's significance and a conservation priority in its own right
- Its historic built form as a simple, single-storey, single-fronted commercial premises, reflecting the pattern of small-scale commercial development along Lower Street East recorded in the EUS historic character mapping across Periods 10 and 11 (18th and early 19th century)

- Its position within HUCA 2 in immediate proximity to the Grade II Listed Building at No. 58 Lower Street, contributing to the group value of the historic streetscape at this point on Lower Street

The significance of No. 56 does not reside in the specific material of its fenestration. The EUS contains no record attributing significance to the building's joinery. The proposal preserves all four of the above attributes of significance without alteration. It does not change the building's form, its use, its position in the streetscape, or its contribution to the group value of the surrounding listed buildings. The replacement of deteriorating timber joinery with a well-made, durable aluminium system in a muted finish ensures the building's frontage will remain in good order; securing the continued commercial occupation and well-maintained appearance of a locally important building in HUCA 2. This directly serves the EUS's stated concern that such buildings are vulnerable to neglect and to the loss of the commercial function that characterises this part of Lower Street (EUS, p.27).

7.2 Assessment of Impact

In accordance with NPPF Paragraphs 212, 215 and 216, and Policy 34 of the HDPF, the impact of the proposed works on the significance of the heritage asset and the conservation area has been assessed. The assessment is as follows:

- Substantial harm: the proposed works do not constitute substantial harm to the significance of the conservation area or of No. 56 as a non-designated heritage asset. The existing opening dimensions, frontage composition and overall character of the building are preserved in all material respects.
- Less-than-substantial harm: it is submitted that the proposal causes no harm to significance. If any harm were identified, it would be at the very lowest end of the less-than-substantial scale, limited to the change in material from timber to aluminium. This is offset by the fact that the existing timber is in a deteriorating condition and no longer maintains the appearance of the building to an acceptable standard.
- Public benefit: the public benefits of the proposal include the sustained commercial viability of an active business within the conservation area; improved

security provision; improved thermal performance; a minimum 25-year maintenance-free service life; and the prevention of further deterioration of the building's frontage. These benefits substantially outweigh any conceivable harm.

It is noted that a deteriorating timber frontage is itself identified as a negative element in the Conservation Area Appraisal and Management Plan. The present proposal directly addresses this risk by providing a replacement that will maintain the appearance and character of the building reliably and durably over the coming decades. This is a conservation outcome, not a harmful one.

7.3 Colour and Finish Justification

The selection of Anthracite Grey (RAL 7016) as the finish for both the main frontage and the side elevation window has been considered carefully in the context of the conservation area. Anthracite Grey is a dark, neutral colour that reads as a recessive tone against the painted brickwork of the building. It is widely used in conservation area settings across the country as a sympathetic alternative to traditional painted joinery finishes, precisely because of its muted, non-corporate character.

The existing burgundy/dark red paint finish applied to the timber joinery is a decorative surface treatment, not a historic or structural feature of the building. It is not cited in the EUS, the Conservation Area Appraisal or any other heritage designation as a defining characteristic of No. 56. The Applicant has carefully considered whether to match this colour in the new aluminium system; however, Anthracite Grey is judged to be the more durable, coherent and contextually appropriate choice for the following reasons:

- Anthracite Grey is a standard powder coat finish with a proven track record in conservation area settings and is accepted by many local planning authorities including Horsham District Council in comparable applications
- A dark red powder coat in aluminium, if not carefully specified, risks appearing as a bright or plastic-looking finish inconsistent with the character of the area
- The Anthracite Grey finish is visually coherent across both the main frontage and the side elevation window, producing a unified appearance for the building

- The muted tone ensures that the fenestration remains subordinate to the painted brickwork of the building, consistent with the character of the conservation area

8. Conclusion

This application for the replacement of the shop front fenestration and side elevation window at 56 Lower Street, Pulborough has been prepared with careful regard to the heritage context of the site, the requirements of national and local planning policy, and the character and appearance of the Pulborough Lower Street Conservation Area.

The proposal is submitted on the following basis:

- The proposed works are modest in scope, involving no change to the form, scale, massing or use of the building
- The replacement frontage closely replicates the existing composition of the shop front in terms of format, proportions and subdivision
- The proposed material (aluminium powder-coated in Anthracite Grey - RAL 7016) is appropriate for a commercial premises in a conservation area setting and has been selected to minimise any visual impact
- The Smart Shopline and Alitherm 400 systems are high-quality commercial products with proven performance in demanding environments, and will provide a minimum 25-year service life with minimal maintenance
- The proposal addresses legitimate security and thermal performance concerns without compromising the character or appearance of the building
- The proposal secures the continued viable commercial use of No. 56, thereby sustaining an active, contributing frontage within the conservation area
- The proposal is consistent with NPPF Section 16, HDPF Policies 14, 32, 33 and 34, and the Pulborough Conservation Area Appraisal and Management Plan
- A planning precedent for replacement shop front fenestration within the Pulborough Lower Street Conservation Area exists at No. 81 Lower Street (DC/21/0596)

For all of these reasons, it is submitted that the proposed works preserve and sustain the character and appearance of the Pulborough Lower Street Conservation Area and of No. 56 Lower Street as a non-designated heritage asset, and that planning permission should be granted accordingly.