



Appeal Decision

Site visit made on 10 December 2025

by **L N Hughes BA (Hons) MSc MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 9th January 2026

Appeal Ref: APP/V5570/W/25/3373716

Former part of the Archway Methodist Central Hall, at the junction of Archway Road and St. John's Way, Islington, London N19 3TD

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Better Archway Forum against the decision of the Council of the London Borough of Islington.
 - The application Ref is P2019/0214/FUL.
 - The development proposed is Change of use of the existing Archway Methodist Central Hall building (Formerly Use Class D1 now F.1) to Arts Centre classes (Formerly Use Class D1/D2, now F2) and ancillary theatre use (Use Class Sui Generis), including the creation of 240 square metres (GIA) within the existing building at first floor level along with associated external alterations.
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Decision

1. The appeal is dismissed.

Applications for costs

2. An application for a full award of costs was made by Flowervale UK Limited against Better Archway Forum. This is the subject of a separate Decision.

Preliminary Matters

3. The address cited on the planning application and appeal form is “*Archway Central Hall, 11 St John's Way, London, N19 3QS.*” The Council's decision notice uses the address as in the banner heading above, which replicates that used within the previous appeal decision for the site¹. I find this provides most accuracy and consistency, and so I have also used this address for this appeal.
4. The application form description of development is “*Change of use from solely Class D1 to Arts Centre classes D1 and D2 with ancillary sui generis theatre use and incidental extension and alteration to external appearance.*” The previous Inspector confirmed that other uses carried out within the building were to support its primary purpose as a place of worship, and that notwithstanding its vacancy since 2001, the D1 use (non-residential institutions) of the building persisted. Use Class F1 was subsequently introduced in September 2020, which covers some of the former D1 use classes. As such, the parties agree that the existing use is now Use Class F.1 (f), being “*for, or in connection with, public worship or religious instruction,*” and I take the same view.

¹ P2018/4068/FUL, Appeal Ref: APP/V5570/W/19/3229738; Demolition of the existing building and the erection of a six-storey building comprising 3,939.3 sqm of B1(a) office space; Dismissed on appeal 7th February 2020.

5. The appellant considers the non-theatre element of the proposal would fall under Class F1, being (a) the provision of education, (b) the display of works of art (otherwise than for sale or hire), and (e) a public hall or exhibition hall. The Council considers that the proposed arts centre class use is also likely to fall under Class F2(b), being a hall or meeting place for the principal use of the local community. The proposed theatre use would be Sui Generis. It is described as ancillary within both the application form and decision notice description of development, albeit the Council contends that it may be more than ancillary given its scale and potential intensity of use. As this matter is not determinative to my reasoning, and I am dismissing the appeal, I find it unnecessary to address whether it would only be ancillary in nature in any further detail.
6. Overall, as the proposal is not solely for external alterations but includes a new internal floor providing additional floorspace, I find the Council's decision notice description to be more accurate and appropriate, and so have used this in the banner heading above.
7. The appellant also contends that the proposal is not 'major' development under The Town and Country Planning (Development Management Procedure) (England) Order 2015, due to a disaggregation of floorspace by its proposed uses, and by period of time of use. The Council disputes this position, as overall there would be the creation of a single proposal of 1,440sqm of cultural use floorspace. I similarly see no evidence to suggest that the single proposal can be broken down into constituent parts or based on time of uses in the manner suggested. I am satisfied based on the evidence before me that the proposal forms major development.
8. The appellant also suggests that much of the proposal would be permitted development. However, in the absence of evidence such as Certificates of Lawful Development, I have to assess the proposal put before me, which requires planning permission as a single entity.
9. Flowervale UK Ltd is the site owner, and a statutory third party for this appeal. Their own planning application for the site² ('the Flowervale application') remains under determination by the Council, and so is not an extant fallback position. The fallback is the building's ongoing vacancy. For the avoidance of doubt, the remit of my appeal decision therefore does not judge which of the two proposals may be more preferable or possible, notwithstanding that some of the appellant's evidence is framed in this way. I have judged this appeal on its own merits, with pragmatism where appropriate. Flowervale UK Ltd has objected to the appeal, on the same basis as has the Council, and so I have encompassed their position within my reasoning below.
10. The appellant submitted two versions of their Business Plan after the deadline for interested party responses. However, no change in circumstances was presented to justify why these documents were not submitted in accordance with the appeal timetable. Only the Council appears to be aware of their precise content. Although the appellant referenced that Flowervale UK Ltd had not disputed the findings at their previous appeal hearing, that significantly pre-dates these documents, and is

² P2024/2128/FUL: Demolition of existing building on site; erection of a 6 storey building (plus basement) comprising a mixed use of gym (E(d)), medical space (E(e)), education (F1(a)) or religious worship space (F1(f)) at basement level. A mixed use of gym, medical space or education at ground floor with reception area. Medical space (E(e)) will be provided at first floor level with office space (E(g)(i)) in the floors above. Public realm and highway alterations including the widening of the pavement and creation of a loading bay.

not sufficient due process for me to rely upon in terms of allowing fairness and transparency. In accordance with the 'Procedural Guide – Planning Appeals, England', further public consultation would be unjustified as it would significantly delay the appeal timetable, and therefore I did not accept these Business Plans into the evidence.

11. Nonetheless, viability is not a main issue, and so even without any detailed economic assessment, I have not found that a determination on this matter would affect the overall appeal outcome. For the purposes of this decision, I have therefore found it most practical to accept at face value that the proposal would be viable and commercially successful.
12. I viewed the site from the surrounding streets. I was unable to enter the appeal building, due to it not being within the appellant's ownership, and for insurance and safety reasons. My visit included going inside the Methodist Church which also forms part of the wider complex of buildings, accompanied by representatives for the appellant, the Council, and Flowervale UK Ltd. That visit also allowed external views of the appeal building's rear.
13. Application P2020/3585/FUL was granted in April 2021, and has been implemented. This created new entrance doors and a shorter upper floor window on the St John's Way front elevation, and a new fire escape door on the western elevation, with associated internal works. The appeal plans are not accurate as they do not show these works, which also means that the proposed plans do not show an accurate extent of necessary demolition/changes. In particular for example, implementation of the proposed frontage elevation would require removal of the inserted door and reinstatement of the full length window. Nonetheless, I may have been able to address this via conditions had I been minded to allow the appeal. On this basis, I have assessed the development as proposed.
14. At the time of the 2019 application submission, the development plan included several documents which have since all been superseded. The current development plan includes the London Plan (2021), the Islington Local Plan Strategic and Development Management Policies (LP) (2023), and the Islington Local Plan Site Allocations (SA) (2023). On 16 December 2025, the Government published a consultation on proposed reforms to the National Planning Policy Framework (the Framework). This could be subject to further change, and can only be given very limited weight at this stage. It has therefore not been necessary to consult the parties, and Framework references in my decision are to the December 2024 publication (amended February 2025).

Main Issues

15. The main issues are:

- The effect of the proposed development on the character and appearance of the area, with particular regard to the preservation or enhancement of the St John's Grove Conservation Area, and the effect on the non-designated heritage asset of the Archway Methodist Central Hall;
- The effect on the proposed development on highway safety, with particular regard to measures for deliveries, servicing, and refuse collection;

- Whether the proposed development would incorporate sufficient provision for access by cycle;
- The effect of the proposed development on the living conditions of neighbouring occupiers, with particular regard to noise and disturbance, and daylight and sunlight;
- Whether the proposed development would be inclusive and accessible;
- Whether the proposed development would incorporate sufficient sustainable design and green infrastructure measures;
- Whether the proposed development would achieve required fire safety standards;
- Whether the proposed development would provide sufficient contributions towards local infrastructure and training requirements.

Reasons

Character and Appearance

16. The site lies within the St John's Grove Conservation Area (CA), and so I have a statutory duty under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing its character or appearance. Section 16 of the Framework also requires great weight to be given to the conservation of designated heritage assets.
17. The Framework Paragraph 216 also requires the effect on the significance of a non-designated heritage asset (NDHA) to be taken into account. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. It is common ground that the appeal building is locally listed and is a NDHA, despite its 20 year vacancy and poor state of repair and dilapidated condition. The previous appeal decision established that this local listing refers to both the appeal building and the retained buildings in their entirety, and there is nothing before me to suggest that I should take a different position.
18. The appellant references the Framework paragraph 209, such that where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision. However, even were I to agree that this has occurred, the proposed restoration and conversion would thus hold less beneficial weight were I not to take the building's current dilapidated state into account. For the appellant's benefit, I have therefore not considered the neglect to be deliberate in this instance.
19. The London Plan Policies D3 and HC1 align broadly with the Framework guidance. Development proposals affecting heritage assets should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings, identifying the special and valued features and characteristics that are unique to the locality, and respecting, enhancing, and utilising the heritage assets and architectural features that contribute towards the local character. The LP Policy DH2(B) also reiterates the need for development within a CA to conserve or enhance its significance, with clear and convincing

justification for any harm. Part (I) refers that the Council will encourage the retention, repair and re-use of NDHAs, and that proposals that unjustifiably harm their significance will generally not be permitted. Part (A) identifies that Heritage Statements must be informed by specialist heritage advice, and must include sufficient information to allow full assessment.

20. The St John's Grove CA has a mixed character. On Junction Road, the built form is predominantly three-storey terraced buildings, many in business use at ground floor. This gives this part of the CA a busy commercial appearance, focused on the junction with Upper Holloway Road. The significance of the CA, insofar as it relates to the site of the Archway Methodist Central Hall and this appeal, is primarily associated with what is referred to as 'the island site' as being a focal point for the area. This was due to it formerly being isolated within the gyratory system roads. The Navigator Square public space now also contributes to this focus, combined with communal historic and architectural value, and reinforced by its location at the junction of several main roads.
21. The appeal building occupies an important position at the entrance/exit of the CA, with the island site visually linking the CA with the adjacent Holborn Union Infirmary Conservation Area. The remainder of the CA is largely residential, comprising substantial terraced and semi-detached dwellings, constructed in brick with stone dressings, on tree lined streets radiating off Junction Road, which contrast with this busier main thoroughfare. It also contains two impressive church buildings, and Archway Park to the north.
22. Designed in 1930, the Archway Methodist Central Hall holds importance as the last Central Hall built in London. It was previously functionally part of the larger complex of buildings, with the connecting doorway blocked off but still evident. Faced in red brick and reconstituted Portland stone, the Odeon style tower over the main entrance provided the building with some architectural distinction, and inferred its intended use of the Main Hall for films and concerts, as well as worship. The Main Hall is an auditorium originally seating 1,300, including a gallery and a lay light in the deeply coved ceiling. The National Buildings Record identifies it as the most important room, with the only interior of real note. Although much altered, from the balcony much of the original effect can still be appreciated.
23. The previous Inspector found the building to be a positive contributor to the character and appearance of the CA. Despite its poor condition, I still find this to be evident, through its historic and architectural significance. Overall, the building has strong evidential, historical and communal value as defined under Historic England's Conservation Principles. It maintains a strong contribution to creating a cohesive streetscape in a prominent location.
24. The proposal includes the creation of an additional 240 square metres (GIA) of floorspace through the insertion of a new sprung finished floor at first floor level linking existing Hall balconies, along with associated external alterations. It proposes the change of use of the existing building and associated works to cater for a broad range of community and arts activities throughout the day and evening. These include a creche, flexible meeting room space, a screening room for 120 people, a café and bar, a new internal floor to create a theatre stage, and associated seating for 443 people.

25. Alterations only to the interior of a NDHA would not normally be subject to heritage related planning controls. However, there is no clarity whether the proposed new floor in the Main Hall would amount to what could be classified as structural alterations of the building, in which case it would require such permission. This is particularly relevant as some evidence suggests the wider building is subject to structural decay. On this basis, and considering the extent of the changes proposed, I have not determined any specific areas of the proposed internal works as being a potential fallback position, when considering the impact on the NDHA as a whole. This is reinforced because the fallback test is whether there is a 'real prospect', and I do not consider there is a real prospect of the expense of the proposed internal works being undertaken without benefit of an accompanying permission to change the use, particularly as the site owner has objected.
26. Even had I made an internal inspection of the building during my site visit, my own assessment of its significance and the impact of the proposal on that significance would have only been a limited visual and non-technical inspection. It would not have allowed for a technical consideration of the effect on the structural heritage integrity of the building, including its reversibility. In the absence of such evidence, I therefore consider that the lack of my internal inspection was not determinative to my conclusions on this matter.
27. Internally, the proposed lateral separation of the Main Hall would create circulation and increased physical space benefits, and allow for more flexibility for uses and performances. However, in so doing it also has the potential to substantially change the whole experience of this space, and its historic use and functional communal value. Thus, it would negatively impact the building's significance as identified above. The specific heritage impact of this major intervention is not fully explained or justified within the appellant's evidence, in particular whether or not it would be permanent or reversible. In light of the Main Hall being the most important room, the appellant's reference to the demolition and amendments being of minimal impact, indicates how the building's heritage significance has not been sufficiently appreciated. That it would replicate the approach taken at Friends House in Euston Road, does not indicate it would be architecturally and functionally successful in this different context.
28. The cumulation of the other proposed internal amendments may also impact upon the architectural and historical significance. The design rationale is limited, including a lack of consideration of any other options which may provide similar benefits. I am therefore unconvinced that the proposal would result in a high quality building with no harm to the NDHA.
29. Externally, the main outcome to external vistas would be a building restored relatively faithfully to its form prior to its vacancy. This improvement from its shuttered and dilapidated appearance would provide a significant betterment to the existing position. It would reflect the SA allocation ARCH3, which identifies the site's development considerations as being that "*The site is prominent in townscape terms, and development proposals should seek to retain and sensitively restore the existing locally listed building.*" The lack of detailed information on some matters could be sought via conditions.
30. However, matters relating to changes to the curtilage and street layout, which I address in more detail in the following sections, are unknown. Similarly, the impact of the roof extensions, while small-scale in the context of the size of the overall

building, may have undue prominence or appear incongruous on this important frontage, able to be viewed from some distance. The same may apply to the solar panels, and ducts. The drawings and level of detail provided are overly simplistic in the context of works to a complex heritage asset. Only very limited information on their visual appearance and their effect on significance has been provided.

31. On this basis, I cannot be certain that there would be an overall benefit to the character and appearance of the NDHA and the CA, even with the external building fabric restored. The information is insufficiently detailed to allow for accurate assessment of the effect of the proposal as a whole on the significance of the heritage assets. I cannot therefore conclude that the character and appearance of the CA would be preserved or enhanced. In this manner it also fails to demonstrate a high quality contextual design. The proposal may cause harm, and I am therefore directed to find Framework and development plan conflict.
32. Overall, the proposal may thus cause less than substantial harm to the significance of the CA as a designated heritage asset, within the lower range of that spectrum of harm to which the Framework paragraph 212 requires that I give great weight. There would also likely be harm to the Archway Methodist Central Hall as a NDHA. Insofar as the proposed development may cause harm to these heritage assets, it would conflict with the London Plan Policies D3 and HC1, and the LP Policy DH2, as outlined above.
33. The Framework paragraph 215 identifies that less than substantial harm to the significance of a CA should be weighed against the public benefits of the proposal, and paragraph 216 identifies that a balanced judgement will be required in relation to the NDHA, having regard to the scale of the harm and its significance. I address these matters in my Planning Balance section.

Highway Safety

34. The plans indicate an existing loading bay, and a planned lay-by. The application form identifies two existing parking spaces for light goods vehicles, which can accommodate a bus at other times when not in use for deliveries. However, a Transport for London (TfL) red-route prevents any vehicles from loading or parking adjacent to the site, around this very busy junction. Since the completion of the Archway gyratory works in approximately 2017, there has been no vehicular access connecting the highway and the building, and no lay-by. The closest loading bay is approximately 160m from the site via a pedestrian footway. The proposal therefore fails to demonstrate how deliveries, servicing, and refuse and recycling collection can be undertaken. It is highly evident that with the current road layout, this cannot be achieved. I therefore find there would be a detrimental impact to highway safety.
35. The appellant refers that the TfL gyratory removal scheme includes a yet to be completed layby, postponed while the Central Hall remained unoccupied. However, this is not referenced in the TfL consultation response, which states that "TfL observes there is no loading bay here and we are not aware of any proposed loading bay in the area." This response dates from 2019, and no updated evidence has been presented to me to confirm that a lay-by will be constructed. Beyond this reference by the appellant, there is no indication that highway works are incomplete.

36. The Flowervale application does reference negotiations with TfL about a new loading bay. However, precise details of these are not before me, and the application is undetermined. Most importantly, they relate to a completely different proposal, with no guarantee that the same highway matters would be relevant or be agreed were I to deal with this matter though the imposition of appropriately worded planning conditions. The use of conditions would thus be unreasonable, as there is no indication on the basis of the evidence before me that works to the highway, outside of the appellant's control, would be likely.
37. The proposal would therefore be harmful to highway safety, and would conflict with the London Plan Policy T4, and the LP Policy T5. Amongst other matters, these require that development proposals should not increase road danger, and that Delivery and Servicing Plans will be required for developments that may impact on the operation of the public highway in order to demonstrate how safe, clean and efficient deliveries and servicing have been facilitated, and any potential impacts will be mitigated.

Cycle Access

38. The application form states that 10 cycle parking spaces would be provided, identified as being in the former loading bay along the building's north-east side. However, these are not shown on the plans. I therefore cannot be certain that this area is practical and accessible, with sufficient circulation space for their functional provision, especially as there may be conflict with that area's fire escape function. Moreover, the Council advises that there should be a minimum of 18 cycle spaces for the theatre use, plus additional spaces for the other uses. Even were I to consider a lower level of cycle storage to be acceptable due to the highly sustainable location, it is still evident that suitable available space would be lacking. Relying on existing public provision would be unacceptable.
39. With no evidence at all that appropriate cycle storage could be achieved, it would be inappropriate to delay consideration of this matter until condition stage, as layout amendments may be required. Bearing in mind the size of the building and the availability of dressing rooms, end of trip facilities such as lockers and showers could potentially be required via condition, but this would not mitigate the lack of cycle storage.
40. The proposal would therefore fail to provide sufficient cycle facilities, which would not encourage sustainable forms of transport, and help remove barriers to cycling and create a healthy environment in which people choose to cycle. It would conflict with the London Plan Policy T5, and the LP Policies T2 and R10. These require developments to provide cyclist entrances and cycle parking to be safe and convenient for all, being fit for purpose, secure, and well-located, and inclusive and accessible end-of-trip cyclist facilities. Cycling infrastructure and facilities are required to be designed in accordance with relevant guidance and/or best practice standards.

Living Conditions

41. No technical evidence has been presented to identify expected noise levels arising from the proposal, the subsequent impact on nearby receptors, and the types of possible mitigation should noise levels be calculated to exceed generally accepted levels. There is no demonstration that noise levels would only be equivalent to those from the building's previous use as a fallback, and indeed I find this unlikely

considering the increased types and intensity of uses now proposed, and modern audio systems.

42. Attempting to limit noise through planning conditions would not be enforceable or reasonable, as there is no technical baseline against which I could set acceptable standards of noise with which to adhere. The licencing regime may provide levels of control over these matters, but does not diminish the need to also comply with the development plan.
43. Overall therefore, it is evident that the lack of information presented in this regard suggests a failure to comply with the London Plan Policy D13. This requires new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses to put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. It would also conflict with the LP Policies Plan1 and R10, regarding the need to provide a good level of amenity, and incorporate appropriate measures to limit effects of sound, vibration and other effects of the re-provided/intensified cultural use on existing and potential future land uses in the area.
44. The proposal includes three infill roof extensions at second floor level. The extension in dispute is on the western side, adjacent to the courtyard enclosed by the conjoined property. These buildings have rear elevation windows in relatively close proximity. No bespoke daylight and sunlight assessment has been submitted, with the evidence relying in proxy upon that submitted for the higher building proposed under application P2015/1144/FUL, dismissed on appeal. That previous proposal would also have infilled this courtyard area.
45. Both the Council and the previous Inspector concluded that the impact of that proposal on neighbouring occupiers would be satisfactory. The Council considered it would meet the relevant BRE tests, and so would not unduly compromise the amenity of neighbouring residential properties. The Inspector concluded it would only result in minor daylight and sunlight reductions to some windows, in dual aspect properties, such that there would be no severe effect on living conditions taken as a whole.
46. The appellant's evidence suggests that only the second floor is in residential occupancy. This would be above the height which I consider could be affected, due to the angle of the path of the sun, that the fact that the infill would be set between existing roof forms of at least of equal height, with the existing higher roof form extending to the south. The lower floors comprise part of the Methodist Church building. On the basis of the above considerations, despite the absence of a bespoke daylight or sunlight assessment, I consider that no undue harm would be caused in this regard.
47. Although no harm would be caused to the living conditions of neighbouring occupiers with respect to daylight and sunlight, I do find there would be harm to living conditions due to the potential impacts of noise, vibrations, and other disturbance. As outlined above, the proposal would therefore conflict with the London Plan Policy D13, and the LP Policies PLAN1 and R10.

Inclusive Design and Accessibility

48. Inclusive Design goes beyond traditional concepts of accessibility. It takes into account the diversity of complexity of communities, and is informed by the

Equalities Act 2010 which refers to protected characteristics. I must also have due regard to the Public Sector Equality Duty (PSED) as set out in s149 of the Equality Act 2010, including the need to seek to eliminate discrimination, to advance equality of opportunity, and to foster good relations between persons who share a protected characteristic and those who do not share it.

49. The London Plan Policy D5(B)(5) specifies that as a minimum, at least one lift per core should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The proposal would not provide an evacuation lift, with no specific explanation as to why this could not be achieved. The capacity of the proposed platform lift also appears insufficient considering the number of visitors and types of spaces which require access. Part of the ground floor would only be able to be accessed via a 'chair lift', which BS8300:2-2018 guidance states should only be installed where it is not possible to install a conventional passenger lift or a vertical lifting platform. Chair lifts are normally unsuitable for public buildings as they are slow, require some level of standing mobility, and usually do not allow for independent use. No detailed explanation has been provided as to why better lift facilities could not be provided, or a risk assessment to ensure that means of escape are not compromised.
50. Furthermore, the ground floor toilet is proposed for wheelchair access, but insufficient information on its dimensions and fitout have been provided. The other accessible toilets also do not appear to meet the necessary requirements in BS8300:2 or Approved Document M in terms of overall dimensions or sufficient wall space to attach grabrails. The appellant refers to aspects such as "*at first floor the cubicle could be enlarged to full-sized if a sliding door is acceptable*", and "*at second floor the accommodation can if needed be exchanged for the much larger proposed Cleaners Room.*" However, such decisions should already have been made and finalised within the layout design. This does not indicate a focus on inclusive design when working up the proposals.
51. The proposal also does not provide or lacks details on a range of other matters, including baby changing facilities, drinking water stations, gender neutral dressing room provision, circulation requirements including detail around flush thresholds and wheelchair accessible door widths, step-free accessibility of the back of the house area and performance space, sufficient space for a mobility scooter charging point for visitors and staff, accessible cycle parking for visitors and staff, accessible staff parking, alarm systems, and induction loop installations.
52. Although further detail on some of these elements could be addressed via conditions, this would only be for small-scale physical measures. The majority of requirements to address inclusivity and accessibility in an appropriate manner are integral to the building's physical fabric and layout, and so have to be addressed at the current stage. Any compliance of various elements with the Building Regulations Part M or English Tourist Board guidance, does not also outweigh the need to comply overall with the numerous development plan requirements focused on inclusive access.
53. Particularly for individuals with mobility issues, the proposal would create significant barriers to access and movement, such that it would not be consistent with the Equality Act and the Public Sector Equality Duty. It would fail to guarantee a safe and dignified evacuation for everyone and would require obvious special treatment around evacuation for those with protected characteristics.

54. The proposal would provide better accessibility compared to the current physical infrastructure and layout of the building, and its historic use, but would still cause harm by a lack of inclusivity and accessibility in the context of its intensification and expansion. I acknowledge that some flexibility in standards may be necessary for building conversions, particularly those with historic interest. However, even if this were the case in this instance, higher levels of inclusive design appear to be achievable than currently demonstrated. For a building with the main purpose of serving visiting members of the public, there is insufficient justification as to why inclusive design standards would not be met. The need to undertake safe evacuation within a building of this scale and capacity is self-evident.
55. On this basis, the proposal would not be inclusive and accessible, and would conflict with the London Plan Policies S1, D5, and HC6, and the LP Policies PLAN1, R10, and SC1. In combination, amongst a range of other matters they require new social and community infrastructure development to provide the highest standards of accessible and inclusive design which meet the needs of intended occupants, to provide appropriate drop-off/pick-up facilities for disabled people, and be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation, or special treatment.

Sustainable Design and Infrastructure

56. A range of sustainable design and infrastructure improvements for the proposal are outlined. Alongside the benefits of retaining the principal building fabric for whole life carbon footprint efficiency, measures include roof solar panels, roof light improvements, building fabric insulation, sedum green roofing with some brown roof, replacement windows, extending the ventilation intake, heat recovery, and ground source heat pumps.
57. While these would represent an improvement compared to the existing building, no specific technical details, plans, or quantified assessment are provided. I note the submitted BREEAM Pre-Assessment Summary Report excellent score, but this has only a limited explanation of its component proposals, and does not address the other matters. I also disagree with the appellant's assertion that the somewhat invasive exploration of the existing fabric to quantify such energy improvements would be unjustified prior to approval. Some attempt must be made to provide confidence that they could be achieved.
58. The appellant provides an overview explanation of the proposed combination of passive design features, energy efficient building services, and renewable energy sources. However, this is made in reference to outdated policy and targets. They reference a target to achieve 25% reduction in regulated CO2 emissions compared to 2010 Part L Building Regulations. However, the LP Policy S4(D) target is to achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27% beyond Part L of the 2013 Building Regulations. The London Plan Policy SI 2 (C) requires achieving a 35% reduction in regulated emissions. Moreover, as no Building Regulation Part L baseline is before me, it is not possible to demonstrate whether measures could be achieved.
59. There is also no Carbon Offset calculation, required by the London Plan Policy SI 2 and the LP Policy S4. The Council's evidence explains in detail how several other energy and sustainability requirements are not demonstrated, such as thermal modelling, future-proofing for connection to a future District Energy

Network or Shared Heat Network, a Draft Green Performance Plan, and integrated water management and sustainable drainage. Numerous development plan policies relate to this topic, which further indicates that such matters cannot be entirely deferred to the condition stage, as this is essential to a proper consideration of the proposal, and may not be possible or may require layout amendments to be achieved.

60. Overall therefore, the proposal would not incorporate sufficient sustainable design and green infrastructure measures, and so would conflict with the London Plan Policies GG3, SI1, SI2, SI4, SI7, and D3, and the LP Policies S1, S2, S4, S3, S4, S5, S6, S7, S9, S10, G1, G4, and G5. Together these require development proposals to address a range of very detailed sustainable construction requirements and targets, which I have summarised above. More generally, they aim for high sustainability standards and seek to create a healthy and net-zero carbon city, and for development to maximise energy efficiency and align with the energy hierarchy, improve air quality, manage heat risk, provide green infrastructure, and reduce waste.

Fire Safety

61. The London Plan Policy D12(B) specifies that the proposal should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of a detailed range of matters such as means of escape and evacuation, and features which reduce the risk to life.
62. Many of these matters lack clarity or are unaddressed in the appellant's brief Fire Statement³, or are not clearly shown on the plans. Importantly, the Fire Statement does not detail the fire safety qualifications of its author, or demonstrate its production by an independent third party. As such it does not comply with Policy D12(B). Given the essential importance of the need to ensure fire safety, due to the obviously catastrophic potential outcome of fire, it is very evident that the proposal needs to entirely accord with Policy D12. Delaying consideration of such matters until condition stage would be inappropriate, because there needs to be certainty that the building design and layout can accommodate them, to make the proposal safe. The lack of Building Control objection does not demonstrate compliance with the development plan. I note the London Fire Brigade response pre-dates the 2021 adoption of the London Plan.
63. On this basis, I have found it unnecessary to consider in any further detail the specific ways in which the appellant suggests the proposal would meet fire safety requirements, including against Policy D12(A), as I would find significant harm and development plan conflict even were I to agree some level of compliance. The proposal would therefore not achieve the highest standards of fire safety and ensure the safety of all building users, and would be contrary to the London Plan Policy D12. This reason for refusal also references the London Plan Policy D5, but I have already addressed this policy above.

Local Infrastructure and Training Requirements.

64. The Council identifies that a legal agreement is required to ensure provision of several matters required by different development plan policies and the Council's

³ 0803 Optional: Planning Fire Safety as London Plan 2021 Policy D12

Planning Obligations Supplementary Planning Document (SPD). An Agreement should include compliance with the Code of Construction Practice including a monitoring fee; compliance with the Code of Employment and Training; facilitation of one work placement or payment of a fee of £5,000; payment of a £3,350 commuted sum towards employment and training for local residents; compliance with the Code of Local Procurement; provision of one accessible parking bay or a £2,000 contribution; and a contribution towards carbon offsetting.

65. The appellant does not dispute the need for these provisions, and indicates that they would be happy to work up a legal agreement in conjunction with the Council, and cooperate with any s106 Agreement that may be proposed. However, in order for me to take a legal agreement into account for an appeal, it has to be fully signed and completed at the point of my decision. Appeal documents should be submitted in accordance with the stated timescales in the Start Letter. No legal agreement is before me, and therefore the proposal would not provide or ensure such financial contributions or other necessary obligations.
66. On this basis, the proposal would fail to provide necessary measures to mitigate its impacts on local services and the environment, and provide required benefits to the local population. It would therefore conflict with the London Plan Policies E11, SI 2, and T4, the LP Policies B5, S1, T1, and T3, and the Planning Obligations SPD. Together and amongst other matters, these aim for developments to support employment and skills development and training, provide financial contributions to mitigate adverse transport impacts including accessible parking, and to provide carbon offset funding.

Other Matters

67. I hold admiration for the appellant's longstanding efforts to protect and enhance this building for its evident local value, despite their lack of ownership. I have taken account of the numerous interested party representations made at application and appeal stage, which generally indicate strong support for the proposal, for similar reasons as presented by the appellant. These representations include those from the Theatres Trust, albeit that response does raise concerns about detailed layout and design, and the Hargrave Hall community centre representation, which reinforces local experience of a shortage of community facilities.
68. In 2023, Archway was designated as a Creative Enterprise Zone (CEZ), within which the London Plan Policy HC5 states that Local Plan policies should support the development of new cultural venues. The Council acknowledges that notwithstanding that the LP Policy R10 does not directly reference CEZs, the proposal would support this ambition for cultural and creative industry uses. It would benefit and attract arts and cultural provision in the area, with nothing similar currently existing. I also note this would be alongside other benefits arising from the proposed mix of uses, such as education and childcare uses, and promotion of social cohesion across different groups and ages.
69. The appellant has presented supporting arguments for the need for the proposal, that it would be viable and self-funding, and other economic benefits. There would be economic benefits from construction, ongoing use and linked trip spending to this destination venue, alongside new employment. They also consider it complies with and gains support from the ARCH3 site allocation, including that the ground floor frontages along St John's Way can be described as active frontages.

70. For the purpose of undertaking my planning balance, I find that fully accepting these arguments and benefits as presented provides best clarity and simplicity. On this basis, I find it unnecessary to discuss or assess them individually in any further detail.

Planning Balance and Conclusion

71. I have outlined the public benefits of the proposal above. It would also create physical improvements and bring it back into beneficial cultural use, as well as visually improve the dilapidated exterior of the building as a NDHA. Its CEZ location and certain elements of the development plan lend support in principle to its reuse as proposed. The Framework requires me to weigh these benefits against the less than substantial harm to the significance of a CA, and to make a balanced judgement in relation to the NDHA.
72. I give great weight to this harm, and due to a lack of clear and considered information as to the specific impacts of the proposal upon these heritage assets, I find that this harm would outweigh these cumulative public benefits, even were I to accept them all as presented. The proposal would therefore fail to preserve or enhance the St John's CA, and the NDHA, with an overall harmful impact on the character and appearance of the area.
73. Multiple other aspects of the proposal would also be either directly or potentially harmful, or not sufficiently beneficial. There would be significant development plan conflict against multiple policies. This includes matters of highway safety, sustainable cycle travel, noise and disturbance to the living conditions of neighbouring occupiers, a lack of inclusivity and accessibility, insufficient sustainable design and green infrastructure measures, fire safety risk, and insufficient contributions towards local infrastructure and training requirements. I give each of these harmful matters substantial weight, with the exception of giving moderate weight to the lack of cycle provision. That the proposal would cause no harm in terms of loss of sunlight and daylight, forms a neutral factor in the planning balance.
74. Overall, the harm is not robustly justified, and the proposal would be more harmful than the fallback of the building's ongoing vacancy. As such, the proposal would not outweigh the suggested benefits, even were I to cumulatively ascribe them significant weight.
75. On this basis, in conclusion the development would conflict with the development plan as a whole. With no other material considerations outweighing this conflict, for the reasons given above, I conclude that the appeal is dismissed.

L N Hughes

INSPECTOR