
Camden Local Plan Examination – Written Statement – The Arch Company

Written Statement in respect of Matter 5 (Delivering an inclusive economy) on behalf of The Arch Company (Representator Reference No 536) – Camden draft Local Plan examination

1. This Written Statement has been prepared on behalf of The Arch Company (Representator Reference No 536) in respect of Matter 5 (Delivering an inclusive economy) and the associated issue and questions as listed in the Matters, Issues and Questions document (document ref ED04) associated with the independent examination in respect of Camden's draft Local Plan. This Statement builds upon the formal representations submitted by The Arch Company to the Regulation 19 consultation on 27 June 2025.

Matter 5: Delivering an Inclusive Economy

Issue: Whether the Plan has been positively prepared, is justified, effective, consistent with national policy and in general conformity with the London Plan in addressing the economy and employment needs of the Borough.

Q4: Is the Council's approach to industrial land provision by intensifying employment uses on designated and non-designated sites positively prepared, justified and effective?

2. The Arch Company agrees with the Council's approach to intensifying employment uses on under-utilised sites across the borough. On such sites, there should be a flexible approach applied to existing and proposed land uses, to ensure that sites can meet their full potential, and are not constrained in contributing to economic growth due to overly restrictive land use policies.

Q8: Is the requirement in criterion C to market offices using a variety of agents for at least 12 months justified?

3. The Arch Company disagrees with the principle of marketing evidence being required for the loss of office space within railway arches. We expand on this in our response to Q11.

Q9: Is the requirement in criterion C (part 2) of the Policy to consider discounted rents, incentives and flexible leasing arrangements justified?

4. The Arch Company disagrees with the principle of marketing evidence being required for the loss of office space within railway arches. We expand on this in our response to Q11.

Q10: Is the requirement in criterion C (part 3) of the Policy to consider reconfiguration of the premises justified?

5. The Arch Company disagrees with the principle of marketing evidence being required for the loss of office space within railway arches. We expand on this in our response to Q11.

Q11. Should railway arches be excluded from the requirements of criterion C of the policy?

6. Yes, railway arches should be excluded from the requirements of criterion C of Policy IE2.
7. As noted in our Regulation 19 representations, applying IE2(C) to railway arches disincentivises such space being let as office space by small businesses, as doing so would effectively limit the ability of such space to be used for other (non-office) occupiers. Whilst IE2(C) does allow for a change of use in certain circumstances, the minimum 12-month marketing campaign which would need to be carried out would significantly affect the viability (and therefore deliverability) of bringing forward any occupier, notwithstanding the fact that it would leave the railway arch unoccupied for at least 12 months.
8. We have reviewed the minor and main schedule of modifications published by the Council and note the proposed minor modification to paragraph 9.37 of the draft Plan which states that the Council will apply the approach to marketing flexibly for an alternative employment use that would provide benefits for small and medium sized enterprises, in terms of access to

affordable/low cost workspace and subject to other relevant Local Plan policies. Whilst we are supportive in general terms of flexibility being applied for the railway arches, this modification does not go far enough. Policy IE2 should be amended as follows:

- a. **Railway arches should be entirely excluded from any marketing requirement for loss of offices** – in line with NPPF (2024) para 86(2), planning policies should *“pay particular regard to facilitating development to meet the needs of a modern economy”*. Railway arches can be used for a variety of business uses – including for example light industrial, storage and distribution, creative industries, food and drinks production, hospitality uses to name a few, as well as small offices. Forcing a marketing requirement only disincentivises the letting of arch space to new office occupiers, and for those sites already in office use, risks their long-term vacancy, which is counter productive when considering the NPPF’s aims to build a strong, competitive economy. Unlike other sites, such uses within railway arches will not be converted to housing or other non-commercial uses, so would still be contributing to Camden’s local economy. This should be supported and encouraged. Proceeding with a policy which effectively constrains economic growth is not consistent with national policy and therefore would fail the NPPF soundness tests.
- b. Should any justification still be required for the loss of offices within railway arches (which in principle we disagree with), **there should be no reference to “affordable/low-cost workspace”**. As referred to in our representations on Policy IE4, whilst the space within the railway arches is often ‘lower-cost’, it does not necessarily meet the policy definitions of ‘affordable workspace’, and no definition of ‘low-cost workspace’ has been provided. The unique features of arch spaces (barrel ceilings, lack of natural daylight, noise and vibration) mean that they are typically less expensive than other comparable commercial properties, for example, research by Volterra for arch spaces in the LB Southwark demonstrated that they were 25% more affordable than comparable commercial space. Notwithstanding this, such spaces may not necessarily meet the ‘affordable workspace’ definition and subsequently affordable workspace requirements driven through planning policy can constrain bringing development forward. As per point (a) above, this would seem counterproductive to national Government’s general aspiration to drive economic growth and would fail the NPPF soundness tests (criteria (d)).

Notwithstanding this, we note that the Arch Company provides more commercial space for small and medium sized businesses to rent than any other landowner in the UK and play an important role in stimulating economic growth. Given the role of the arches in providing space for a variety of businesses, particularly small and medium sized ones, it is imperative that flexibility is applied to the commercial use of the arches, so that they can be best utilised.

- c. Should any justification be required for the loss of offices within railway arches (which in principle we disagree with), instead **there should be reference to the use having to be another commercial use**. This would ensure that such railway arches remain in active use for commercial occupiers, thereby contributing to Camden’s local economy.
 - d. Any flexibility for railway arches must be included **within the policy wording**, not supporting text. The supporting text does not provide sufficient clarity for applicants nor decision makers on how to apply IE2(C) and does not give The Arch Company the confidence in making letting decisions that letting to an office occupier will not result in effectively creating a protected use which may need to become vacant for a period of at least 12 months before it can be re-used. Providing certainty within the policy wording will make the policy more effective in ensuring it can deliver on Camden’s strategic objective in the draft Local Plan to strengthen Camden’s nationally important economy and maximise opportunities for Camden’s residents, businesses and voluntary sector.
9. We suggest that Policy IE2(C) be amended as follows (changes shown in red) – such changes are considered to make the policy more consistent with national policy and more effective:

“The loss of offices in the borough (aside from within railway arches) will only be considered acceptable where a comprehensive and sustained marketing campaign has been undertaken for at least 12 months, which uses a variety of agents and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council’s satisfaction, with consideration given to the feasibility and viability of the following:

- 1. refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers;*
- 2. discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements; and*
- 3. reconfiguring the premises to meet the demands of growth sectors and smaller businesses, including studios, start-ups and micro businesses.*

Where the condition of the premises is cited as a reason for insufficient interest in the property, the Council may request viability evidence to be submitted, to demonstrate that it is not possible for the building to be refurbished.

Within railway arches, changes of use from offices should be to another commercial use.”

Q13: In criterion D of the Policy, is the requirement to retain a proportion of floorspace as affordable workspace in losses over 4,000sqm (GIA) justified and effective?

10. We suggest that Part (D) be amended to clarify that alternative commercial uses within railway arches would be acceptable. Where office floorspace is being converted to another commercial use, there should be no requirement for this to be provided, even in part, as ‘affordable workspace’. This has not been justified. Again, for railway arch development, affordable workspace policy requirements can prohibit development coming forward. Flexibility needs to be applied in order for the policy to be effective in encouraging economic growth.

Q14: Should the Plan identify the amount of industrial capacity that is required to be delivered over the Plan period?

11. The draft Plan should ensure that the policies are responsive and supportive enough so that modern day occupiers are not constrained in terms of how they use spaces in order to meet local demand.

Q16: Are the circumstances in which the loss of industrial and warehousing land identified in criterion B of the Policy justified, effective and comprehensive?

12. As per our previous representations, we do not consider part (B) of the Policy to be positively prepared as it has the potential to slow down and hinder economic growth and social benefits arising from railway arch occupation.

Q17: Is criterion 2B of the Policy justified?

13. As per our previous representations, we do not consider part (B) of the Policy to be positively prepared as it has the potential to slow down and hinder economic growth and social benefits arising from railway arch occupation.

Q21: Should there be any exemptions from the requirements of the Policy?

14. Yes – as per our representations, rail arch development should be specifically excluded from the requirements of Policy IE4. Whilst the space within the railway arches is often ‘lower-cost’, it does not necessarily meet the policy definitions of ‘affordable workspace’ and subsequently affordable workspace policies can constrain bringing empty and derelict railway arches back into active use

Q22: What are the viability implications of the Policy requirements?

15. Railway arch spaces are rented at a relatively low rent compared to traditional purpose-built employment accommodation and any further reductions or restrictions on rents often makes lettings unviable.

Q35: Overall, are any modifications required to economic policies in the Plan required for soundness?

16. We consider that an amendment to Policy IE9 is required to provide clarity that the policy does not apply to production

kitchens, which serve as an ancillary support system for restaurants (and operate very differently to ‘delivery-led food businesses’ and ‘dark kitchens’).

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12 March 2026