
Camden Local Plan Examination – Written Statement – The Arch Company

Written Statement in respect of Matter 9 (Climate change and the environment) 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 9 (Climate change and the environment) 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 9: Climate Change and the Environment

Issue 1: Climate Change

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to climate change.

Q1: Is the Plan's approach to climate change consistent with national policy and in general conformity with the London Plan?

2. As set out in our representations, we are concerned about the potential for part (B) of Policy CC1 to require a Sustainability Statement to be provided for schemes providing 500 sqm + of additional or re-provided floorspace. This may capture rail arch development. The London Plan takes a more proportionate approach to the submission of sustainability information, for example Policy SI2 requires a detailed energy strategy only on major development proposals (including overheating analysis).
3. The re-use of railway arches is, in principle, sustainable in the fact that existing buildings are being re-used. The arches are generally Victorian structures and we are limited in the extent of physical works that can be carried out due to Network Rail operation/landowner restrictions. The Network rail restrictions also apply to our other assets which may have interface with the live railway – for example, we recently were unable to secure agreement for a living roof on a warehouse due to maintenance requirements requiring possession of the track. We are therefore very limited in terms of works that can be carried out to achieve high BREEAM ratings, or biodiversity net gain, for example. The re-use of these structures and the embodied carbon benefits should be given merit, but it should be noted that many sustainability enhancements are either impractical or impossible given the unique nature of the properties.
4. We request that the supporting text to Policy CC1 provide guidance that the unique characteristics of railway arches are acknowledged and in instances where it can be justified, such information does not need to be provided. Likewise, we suggest that Policy CC5(C) be amended to allow for instances where PV cannot demonstrably be provided, as is often the case in rail arch development due to lack of roof space because of Network Rail operational requirements. Policy CC11 should also be amended to refer to major 'new build' development as incorporating SuDS into rail arch development will, in most cases, simply not be possible. We consider that these amendments would make the policies more effective.
5. It is important that any prescriptive sustainability hurdles do not preclude development coming forward which otherwise would deliver economic and social benefits.

Q6: Is Policy CC6 consistent with the parameters set out in the Written Ministerial Statement on Energy Efficiency (December 2023) in terms of:

a. the proposed target levels

b. the robustness of the submitted evidence supporting any proposed uplift

c. how the proposed targets are expressed within policy

d. the viability implications on future development proposals, including when assessed cumulatively with other development plan policy requirements

e. providing flexibility to respond to the viability findings of individual schemes

6. No, in particular Parts (C) and (D) of Policy CC6 are not considered consistent with points (d) and (e) of Question 6 (relating to the Written Ministerial Statement). As referred to in our representations, notwithstanding the fact that the re-use of railway arch space has inherently low 'upfront embodied carbon' emissions, the ability to make further carbon or energy savings are quite limited given the age of the buildings and the overarching requirements of Network Rail. There must be flexibility applied for railway arches and associated railway land.

Issue 2: Environment

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to the environment.

Q12: Are the requirements of criterion A.1 of Policy NE2 justified?

7. In order for the Policy to be effective, it should be clarified that the requirements in Parts (1) and (2) of Part (A) should apply only to major 'new build' schemes.

Q13: Are the requirements of criterion A.2 of Policy NE2 justified?

8. In order for the Policy to be effective, it should be clarified that the requirements in Parts (1) and (2) of Part (A) should apply only to major 'new build' schemes.

Q14: Should the Policy wording make specific reference to Local Nature Recovery Strategies?

Q15: Are the requirements of Policy NE3 effective in protecting existing trees and securing additional trees within the borough?

9. In order for the Policy to be effective, it should be clarified that the requirement in Part (8) of Part (A) should apply only to major 'new build' schemes.

PED/SRO/U0028089

12 March 2026