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15<sup>th</sup> August 2012

RECEIVED  
15 AUG 2012

BY E-MAIL & POST

Dear Ms Peck,

**OBJECTION IN RESPECT OF PROPOSED CHANGE OF USE & REDEVELOPMENT AT  
CENTRE POINT TOWER, CENTRE POINT LINK AND CENTRE POINT HOUSE, 101 – 103 NEW  
OXFORD STREET AND 5 – 24 ST. GILES HIGH STREET LONDON WC1A 1DD  
2012/2895/P & 2012/2897/L**

On behalf of our clients, Paramount at the Summit of Centre Point, 101 – 103 New Oxford Street, London WC1A 1DD, please find attached an objection to planning applications 2012/2895/P and 2012/2897/L.

If you wish to discuss or require any further information, please contact me directly.

Yours sincerely,

RP   
James Waterhouse  
DIRECTOR

RECEIVED  
15 AUG 2012  
COUNCIL MAIL ROOM  
Planning Support Office - 02

# **Objection in respect of Proposed Change of Use and Redevelopment of Centre Point**

Camden Council Ref 2012/2895/P & 2012/2897/L

Iceni Projects Limited on Behalf of  
Paramount at the Summit of Centre Point

August 2012

## **CONTENTS**

1.	INTRODUCTION	3
2.	RELEVANT BACKGROUND	4
3.	PROPOSED DEVELOPMENT	6
4.	RELEVANT PLANNING POLICY	7
5.	GROUND OF OBJECTION	11
6.	SUMMARY AND CONCLUSIONS	21

## 1. INTRODUCTION

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- 1.1 Icen Projects Limited is instructed by our clients, Paramount at the Summit of Centre Point, 101 – 103 New Oxford Street, London WC1A 1DD to submit a full objection to planning applications 2012/2895/P and 2012/2897/L.
- 1.2 Our clients have a 35 year lease on the upper three storeys (Levels 31 – 33) of the Centre Point Tower. The premises are in use as an events arena, cocktail bar and restaurant. The business was established in October 2008, and attracts both tourists and residents to the top of the tower providing a unique opportunity to view the London Skyline from one of the tallest and most prominent buildings in the Central Activities Zone.
- 1.3 Our clients are entirely opposed to the proposed change of use of Levels 31 – 33 to residential use, which will result in the loss of their very successful and vibrant cocktail bar, restaurant and events arena. The venue has 95 employees, all of whom would lose their jobs were the development to go ahead.
- 1.4 The focus of this submission is the Centre Point Tower, however where relevant we have also highlighted other issues of concern. Our client is not objecting to the upgrading and improvement of the Centre Point and in fact, welcomes this. In addition, our client supports the provision of a balanced mix of uses and in this respect, acknowledges that it may be appropriate to change the use of part of the Centre Point Tower to residential use, which is likely to result in a loss of a portion of the office floorspace. However, such modifications to the proposal are on the premise that Levels 31 – 33 are retained in their current use.
- 1.5 The proposed development in its current form will result in the loss of the following:
- a unique bar, restaurant and events area which provides over 200,000 residents and tourists each year with an opportunity to enjoy panoramic views of the City;
  - 2,595<sup>1</sup> jobs (95 of which are provided in Paramount Levels 31 - 33); and
  - 28,000 sq. meters of office accommodation.
- 1.6 These important economic and tourism assets will all be lost to provide just 82 private market residential units, with no affordable housing.
- 1.7 In this regard, it is respectfully submitted that the proposed development is contrary to planning and sustainable development objectives at local, regional and national level and should be refused permission.

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<sup>1</sup> The ES estimates that the existing office and retail uses generate approximately 2,500 jobs. However, it does not refer to the employment generated at Levels 31 – 33.

## **2. RELEVANT BACKGROUND**

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### **a) Site Location & Description**

2.1 Centre Point represents one of London's most iconic buildings, located at the heart of London's West End. Centre Point Tower was London's first landmark office tower. Centre Point is a mixed use complex, strategically located above Tottenham Court Road Underground Station entrance, comprising of three elements–

- Centre Point Tower which accommodates office space and a restaurant/bar/events arena,
- Centre Point Link which accommodates office and retail space and
- Centre Point House which accommodates residential and retail use.

### **b) Paramount at the Summit of Centre Point**

2.2 A key feature that makes Centre Point unique is the location of a restaurant, bar and viewing gallery at Levels 31 – 33 in Centre Point Tower which provides spectacular views of the city. Our clients have a 35 year lease on the upper three storeys (Levels 31 – 33) of the Tower. Subsequent to receiving planning approval in 2007 for works to the upper levels of Centre Point Tower, our clients invested in the range of £5 million into creating a unique bar, restaurant and events arena.

2.3 Paramount represents a unique and special experience over the top three floors of the Centre Point building, with each level offering unparalleled 360-degree views across London. It comprises of the following:

- Level 31 – Event arena which has been specifically designed for private hire and often hosts dinners, weddings (has a wedding license), screenings, meetings, launches and presentations. Level 31 can accommodate up to 450 people for a standing reception and up to 150 people seated.
- Level 32 – Restaurant and bar area
- Level 33 – Cocktail bar and viewing gallery

2.4 The Paramount bar, restaurant and events arena serves more than 200,000 patrons per annum and is a very significant tourist draw for the city. Our clients have seen their business grow year on year since it was established in 2008.

2.5 Paramount is a thriving business which employs 95 staff at present. The site is not available for development, as the top floors are subject to a long lease as detailed above. The applicant

has held brief discussions with our client regarding the subject planning applications, however to date, the application has not been modified to retain the bar, restaurant and events area, despite the 35 year lease. In this respect, the Planning Authority should note that the site is unavailable for development and is therefore unable to provide a development of the type envisaged by the applicant.

**c) Public Transport**

2.6 The application site benefits from very significant planned transport improvements which include a new Crossrail station linked to Tottenham Court Road underground station and an enlarged Underground station ticket hall. Tottenham Court Road Station is due to be served by Crossrail by 2018.

2.7 Crossrail represents a project of national significance and is identified as a catalyst for safeguarding the national economy. The primary purpose of Crossrail is to improve the attractiveness of London for investors and to generate increased employment in the city, close to Crossrail stations such as Tottenham Court Road which will benefit from the Northern and Central Lines, in addition to Crossrail. Crossrail has been funded on the premise that it will address a capacity constraint affecting the most productive sector of the UK economy.

2.8 In this respect, the Crossrail Business Case Update: Summary Report July 2011 at 3.3 states that:

*"Crossrail can also enable the regeneration of areas around other stations along its route through improving accessibility with shorter journey times, and giving employers located along the route better access to a larger, more highly skilled labour market with more choice of skilled employees. This is likely to attract new private sector development, and increased employment densities, near Crossrail stations."*

2.9 Centre Point is strategically located directly adjacent to Tottenham Court Road Station. This presents an ideal location for employment generating activities which can capitalise on the unparalleled public transport connections. The use of the building for a broad range of uses including office, bar / restaurant and retail such as the existing and established uses, will ensure that the property utilises the public transport available. The change of use of this building to solely residential use, with an element of ancillary retail on the lower levels, would represent a failure to utilise the Crossrail investment and therefore runs entirely contrary to the business case and key sustainability principles upon which Crossrail is based.

### **3. PROPOSED DEVELOPMENT**

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3.1 The Applicant, Almacantar (Centre Point) Limited is seeking full planning permission for the refurbishment and change of use to residential of the Centre Point development which comprises Centre Point Tower, Centre Point House and the Centre Point Link building.

3.2 At present Centre Point comprises of the following:

- Centre Point Tower consists of 34 storeys with offices from the ground to the 30th floor, Paramount is located at Levels 31 – 33 (part) and there is also plant on the 33rd (part) and the 34th floor. In terms of office floorspace, Centre Point provides serviced offices and conventional office space.
- Centre Point House, which is 10 storeys in height, comprises of offices, 36 residential units (4,086 sq. m.) and retail uses at the lower floors (6,987 sq. m.).
- Centre Point Link is 4 storeys and accommodates conference facilities and offices for the Confederation of British Industry (CBI).

3.3 The proposed redevelopment consists of two planning applications for full planning permission and listed building consent comprising of the following works:

- Change of use of 27,516 sq. m. office accommodation to 31,944 sq. m. residential floorspace to provide 82 residential units and ancillary residential floorspace (spa, gym, pool and club) and 7,667 sq. m. gross external area retail floorspace.
- The 31st and 32nd floors will each contain one residential unit, and plant area previously located within the top floors will be reduced to provide a penthouse duplex between the 33rd and 34th floors. Thus, three residential units in total will replacement the existing paramount bar/restaurant/events arena at Levels 31 – 33.
- Restoration works include; relocation internally of the existing external ground and mezzanine eastern and western staircases, the replacement and refurbishment of the facades, fenestration and shopfronts, the interior of Centre Point Tower is to be refurbished to accommodate the change in use from office to residential, and alterations to the ground floor layout to facilitate integration of the building into the proposed new public realm around the base of Centre Point Tower, the Link Building and Centre Point House.

## 4. RELEVANT PLANNING POLICY

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4.1 The loss of existing businesses within the development and the permanent loss of almost 28,000sq.m of business floorspace in a primary commercial location in central London runs entirely contrary to the objectives and policies of the Development Plan and the Government's new National Planning Policy Framework.

4.2 The National Planning Policy Framework (NPPF) provides for the change of use from office to residential where there is an identified need for additional housing and provided there is not strong economic reasons why such a development would be inappropriate. In this regard, Paragraph 51 of the NPPF states that:

*"Local planning authorities should identify and bring back into residential use **empty housing and buildings** in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for **change to residential use** and any associated development **from commercial buildings** (currently in the B use classes) where there is an **identified need for additional housing** in that area, provided that there are **not strong economic reasons why such development would be inappropriate**." (Our emphasis)*

4.3 At the outset it should be noted that this building is not vacant. On the contrary, the building is in active use accommodating a diverse mix of office and business uses and a bar/restaurant/events arena. This objection details the strong economic reasons why the change of use of this building from commercial use is wholly inappropriate:

- The site lies within the Central Activities Zone, which forms the economic core of the city in which office and tourism are primary uses.
- The proposed redevelopment will result in the loss of the businesses currently operating from Centre Point which include our client at Levels 31 – 33 in addition to a host of other businesses and office tenants.
- The proposal causes material harm to those businesses and will result in the loss of jobs that will not be replaced through the redevelopment. Accordingly, there will be a significant adverse impact in economic terms which cannot be offset through mitigation measures.
- New transport infrastructure is being provided below the development which has the stated primary purpose of supporting the growth of financial and service sectors in Central London. The investment in new transport infrastructure is not being made to foster the loss of such floorspace for residential, which would be the result of the



proposals. The London Plan emphasises the importance of optimising the benefits from Crossrail stations at Bond Street and Tottenham Court Road. There is a clear policy conflict that will result in material harm to successful, trading businesses.

- The proposal provides only private market housing, with no affordable housing units, or benefits for the local economy.

4.4 The subject property is located within the Tottenham Court Road Opportunity Area. The London Plan, at Annex 1, sets targets for growth areas up to 2031 and identifies that the Tottenham Court Road area should deliver an additional 5,000 new jobs and 420 (minimum) new homes.

4.5 The HCA Densities Guide indicates that circa 12sq.m of B1 floorspace is required to support a job and on this basis, the Tottenham Court Road Opportunity Area is required to provide 60,000sq.m of additional B1 floorspace. This strategic London Plan requirement will effectively be increased to 88,000sq.m as a result of this development. In terms of job numbers, this equates to an increase of 50%. Evidently, the proposal results in material harm and there are significant strategic policy implications with the development.

4.6 The London Plan designates the site within the West End Special Retail Policy Area (WESPRA) and states in Paragraph 2.47:

*"planning policy should continue to support the area's future as a retail and leisure district of national, city-wide and local importance"*

4.7 This designation highlights that the location is of national importance in economic development terms. Of even greater significance is the designation of the land within the Central Activities Zone (CAZ). Policy 2.10 of the London Plan highlights that the location is of international as well as national importance. The policy states that it is a strategic priority to:

*"emphasise the Mayor's commitment to promote the roles of the CAZ at a London wide, national and international level, emphasising the CAZ as having key local and strategic uses as a retail, **cultural and competitive business location of international importance**. Emphasis is placed on the improvement of transport and commercial infrastructure within the CAZ, for local residents, workers and visitors to the area; "(our emphasis)*

4.8 Other strategic priorities for the CAZ in Policy 2.10 relevant to the application proposals are as follows:

*A "The Mayor will, and boroughs and other relevant strategic partners should:*

*a enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations ...*

*e in appropriate parts of the CAZ and the related area in the north of the Isle of Dogs, ensure that development of office provision is not strategically constrained and that provision is made for a range of occupiers especially the strategically important financial and business services*

*g sustain and manage the attractions of CAZ as the world's leading visitor destination*

*l improve infrastructure for public transport, walking and cycling, and optimise development and regeneration benefits they can support (particularly arising from Crossrail)."*

- 4.9 It is difficult to understand how a development that results in the loss of 2,595 jobs and replaces them with just 82 new homes within an identified location of national and international importance can be of economic benefit. Moreover, when considered alongside the job target for the Tottenham Court Road Opportunity Area, it is evident that the proposal is wholly contrary to London Plan policy.
- 4.10 The proposal is also contrary to the Local Plan. Camden Core Strategy Policy DP13 'Employment Premises and Sites' states that:

*"The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:*

*a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and*

*b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time. Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:*

*c) the level of employment floorspace is maintained or increased;*

*d) they include other priority uses, such as housing and affordable housing;*

*e) premises suitable for new, small or medium enterprises are provided;*

*f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;*

*g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area."*

- 4.11 Section 5 of this Statement demonstrates that the development proposal fails to meet the requirements of Policy DP13.

## 5. GROUNDS OF OBJECTION

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5.1 Our client's grounds of objection in respect of the current planning applications (and specifically the change of use of Centre Point Tower) are as follows:

- The principle of development is contrary to the Development Plan and causes material harm;
- There will be adverse socio economic impacts, which cannot be satisfactorily mitigated;
- The proposals will result in the loss of an important and unique tourist asset; and
- There are deficiencies in the Environmental Statement.

5.2 When these issues are considered collectively, it is considered that the planning application results in material harm to the growth of London's economy.

a) **Principle of Development**

5.3 The principle of development is contrary to the Development Plan and is clearly unacceptable when the disbenefits of the development are properly assessed and quantified. The adopted Camden Core Strategy (2010) and the London Plan (2011) are the up to date Development Plan Documents and therefore form the starting point for determining applications of this nature. In this respect, the NPPF states at paragraph 12 that:

*"This National Planning Policy Framework does not change the statutory status of the Development Plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and **proposed development that conflicts should be refused** unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place." (Our emphasis)*

5.4 The extent of the policy conflict is highlighted below.

(i) **Loss of Business Use**

5.5 The property currently accommodates almost 28,000 sq. metres of office floorspace and in the range of 2,595 jobs. The building comprises of an active business use which supports many thousands of jobs and thus makes a very positive contribution to the economy. Planning policy supports the retention of such uses and is opposed to the change of use to non – business uses.

5.6 The proposal entirely conflicts with the Camden Core Strategy in this respect which states that it is an objective to “safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers”.

5.7 Policy DP13 'Employment Premises and Sites' states that:

*“The Council will retain land and buildings that are suitable for continued business use and **will resist a change to non-business** unless:*

*a) it can be demonstrated to the Council's satisfaction that a site or building is **no longer suitable for its existing business use**; and*

*b) there is evidence that the possibility of **retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time**”. (our emphasis)*

5.8 The Centre Point Tower building is suitable for its existing business use – offices and bar / restaurant / events arena – which is illustrated by the fact that the offices are largely occupied (applicant states that occupancy levels of the office from 1966 - 2010 are 59%) and the Paramount bar at Levels 31 – 33 is a viable and successful business. Therefore, there is no evidence that this building is no longer suitable for its existing business use. Furthermore, the applicant has not provided any evidence that they have considered retaining, reusing or redeveloping the site for any other business uses.

5.9 The ES details alternative options considered which states that an option was explored involving the retention of the existing use class, maintaining the tower as 100% office use however this option was excluded for several reasons. The reasons include that it would be difficult to bring the office to modern standards of ventilation, the ceiling void required to bring the office spaces to modern standards lowers the floor-ceiling dimension to unacceptable levels and it would reduce the efficiency of the floor plates building. However, the proposed residential use which provides for just 82 units across the entire building clearly represents an inefficient use of such a large scale building in such an important business location.

5.10 A key concern regarding the alternatives considered is that the applicant failed to consider retaining the Paramount bar at Levels 31 – 33. The alternatives only referred to retaining the office accommodation and ignored the presence of the bar/restaurant/events arena which constitutes a very significant and valued business use and tourism attraction. It employs 95 staff who would all lose their jobs as a result of the development.

5.11 The ES (Par 3.37) states that a further option was explored involving a half and half split of use in the tower between office and residential use. This applicant states that this option was

not pursued for several reasons which include complexity of servicing the building and access would be complicated. However, it is considered through sensitive design that all of the reasons identified could be addressed. Again, the applicant failed to considered retaining the bar / restaurant / events arena at Levels 31 – 33 in this alternative option. Mixed – use is promoted in planning policy terms and there are hundreds of examples of successful mixed-use development around the CAZ.

- 5.12 In view of the above, it is submitted that the applicant has not satisfactorily demonstrated that building is no longer suitable for its existing business use or provided evidence that retaining, reusing or redeveloping the site for similar or alternative business use has been fully explored over an appropriate period of time. Therefore, consent should be refused as the proposal is contrary to Policy DP13 of the Camden Core Strategy.

- 5.13 Policy DP13 further states that:

*"Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:*

- c) the level of employment floorspace is maintained or increased;*
- d) they include other priority uses, such as housing and affordable housing;*
- e) premises suitable for new, small or medium enterprises are provided;*
- f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;*
- g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area."*

- 5.14 The proposed redevelopment retains no business use and meets none of the policy requirements.

- 5.15 It is evident that the thrust of policy DP13 is to protect the supply of business premises by ensuring that such changes of use only occur where there is no future need for business use of the property. This is further emphasised in paragraph 13.5 which states that where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. It further states that:

*"The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The property should be marketed at realistic prices, include a consideration of alternative business uses and layouts and*

*marketing strategies, including management of the space by specialist third party providers."*

- 5.16 The applicant has not submitted any evidence that they have carried out a marketing exercise for any period of time to determine whether it is possible to increase the occupancy of the office accommodation. Furthermore, the application provides no justification for the loss of the business use at Levels 31 – 33.
- 5.17 The Council should be aware that the Paramount bar is not available for development and that the intention is to run the existing business from Levels 31 – 33 for the remainder of the lease.

ii) Mix of Uses - Inappropriate Location for 100% residential

- 5.18 The proposed development provides for an additional 82 private market houses and c. 4,000 sq. metres of net retail floorspace resulting in the loss of almost 30,000 sq. m. of business floorspace. The proposed mix of uses and the absence of a balanced mix of uses is entirely contrary to the Development Plan.
- 5.19 The property is situated in the CAZ, where jobs and businesses are the main priority in addition to tourist and cultural uses. There is no policy in favour of 100% residential buildings in the CAZ but rather the policy promotes a balanced mix of uses with the primary focus on business and employment generating uses. In this respect, there is an inherent land use planning conflict of redeveloping large scale office / business floorspace for residential development in a location where office development is prioritised and safeguarded.
- 5.20 Tottenham Court Road is also a designated 'Growth Area' in the Development Plan comprising of the London Plan 2011 and the Camden Core Strategy 2010. Policy CS2 'Growth Areas' in the Core Strategy states that:

*"Development in Camden to 2025 will be concentrated in the growth areas of Tottenham Court Road, Holborn and West Hampstead Interchange, where the mixed use redevelopment of a number of sites is expected to take place."*

- 5.21 The Core Strategy identifies the key role locations such as Tottenham Court Road play in regenerating the local economy stating that:

*"Camden's growth will be focused at King's Cross, Euston, Tottenham Court Road, Holborn and West Hampstead Interchange and the opportunities and*

*benefits this brings - for local people, the economy and regeneration, and our environment - will be maximised."*

- 5.22 A key aspiration of the Core Strategy in respect of Tottenham Court Road includes:

*"a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street"*

- 5.23 The Development Plan identifies the urgent need for office accommodation in growth areas such as Tottenham Court Road. The Camden Employment Land Review 2008 forecasts that the demand for offices will increase by 615,000 sq. m. between 2006 and 2026. To meet this demand, the Council will direct new business development to the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road. The development proposal severely compromises this strategy resulting in material harm to the Development Plan strategy.
- 5.24 The Core Strategy further states that growth areas are also expected to be the location for over 80% of the new business floorspace. This is due to the extensive transport enhancements including the development of Crossrail. The Core Strategy resists development that makes inefficient use of Camden's limited land. The proposed development represents a very inefficient use of a high profile building served by world class public transport.
- 5.25 Local planning policy supports the provision of an appropriate mix of uses, in individual buildings, stating that it can contribute to successfully managing future growth in Camden and make efficient use of its limited land.

iii) Affordable Housing

- 5.26 The Core Strategy does acknowledge that the Council may consider proposals for other uses of older office premises if they involve the provision of permanent housing (in particular, affordable housing) and community uses. However, the proposed redevelopment of Centre Point Tower provides for private market housing only. In this respect the site is an unsustainable redevelopment, given the unwillingness of the applicant to provide on-site affordable housing.
- 5.27 The proposed facility comprising of 82 units (16 x 1 bed, 37 x 2 bed, 26 x 3 bed & 3 x 4 bed) fails to provide a diverse range of housing and does not include any affordable housing, despite the urgent need for affordable housing in the Borough. Camden has a particularly



large requirement for additional affordable homes. The Camden Housing Needs Survey Update 2008 indicated that an additional 4,800 affordable homes would be needed in the borough every year.

**b) Socio Economic Impact**

- 5.28 It is submitted that the proposal will have a significant negative socio economic impact. The proposed redevelopment will result in the loss of the businesses currently operating from Centre Point which include our client Paramount at Levels 31 – 33 in addition to a host of other businesses and office tenants. The proposal causes material harm to those businesses and will result in the loss of jobs that will not be replaced through the redevelopment. Accordingly, there will be a significant adverse impact in economic terms through which there are no mitigation measures proposed.
- 5.29 Section 6 of the ES 'Socio Economics' only considers the loss of the office floor space as a result of the proposed redevelopment and change of use. This section, similar to much of the ES, fails to take account of the loss of the restaurant / bar and the unique viewing platform. The socio economic impact of the loss of the bar / restaurant / events arena should be assessed in order to determine the full impacts and should be considered in terms of the loss of more than 200,000 residents and tourists being deprived of the ability to uniquely view London's Skyline in this location. The ES should include a landscape and visual impact assessment to consider and quantify the loss of the panoramic views for visitors to the top level viewing area.

**i) Employment**

- 5.30 Paramount at Levels 31 – 33 is approximately 1,000sq.m, all of which will be lost as a result of the proposed development and replaced to provide a total of three residential units. The business currently employs 95 staff. The ES acknowledges states that "a *complete assessment of employment created should take into account the number of jobs that currently exist on-site*". Despite this, the ES fails to take account of the current employment provision at Levels 31 – 33.

- 5.31 The ES states at par 6.74 that:

*"As described earlier in this chapter, the existing on-site buildings are currently a mix of office and retail. Based on information provided by the Applicant, it has been estimated that current employment amounts to approximately 2,500. It is assumed that the most likely outcome is that these jobs will relocate to other office space within London. We therefore assume that whilst this may result in*

*employment loss at the site these jobs will remain in Greater London (the identified impact area for employment and expenditure)."*

- 5.32 This paragraph is incorrect in that the existing on site buildings are currently a mix of office, retail and restaurant / bar / events arena with a viewing platform. It is not clear how the figure of 2,500 jobs has been derived given that there is no reference to the Paramount bar and restaurant in the Socio Economics chapter.
- 5.33 The ES states that the most likely outcome is that these jobs will relocate to other office space in the Greater London area, however there is no evidence to support this assumption. The building currently provides office floorspace, which given the evidence provided by the applicant that it is 60% occupied, highlights that despite its condition there remains significant demand for office floorspace at this location. Furthermore, our clients 95 employees will not be accommodated elsewhere in the Greater London area, as Paramount comprises a very unique offer and it would be impossible to find a suitable and available location to establish a bar / restaurant which offers such a unique view of London.
- 5.34 The ES at Table 6-14 identifies that the proposal will generate 162 direct jobs and 114 indirect jobs which will result in a total of 276 jobs created. This represents just 10% of the existing employees in the development.
- 5.35 In view of the scale of job losses that the proposed redevelopment would have, it is considered that the conclusion of this section of the ES should in fact be Major Adverse and not Minor Beneficial.

ii) Local Economy

- 5.36 The ES fails to take full account of the significant socio economic impact that the loss of 2,595 employees will have on the local economy and spending in the Tottenham Court Road area. This will be replaced by an additional 145 residents and the 276 employees in the redeveloped scheme.
- 5.37 The ES acknowledges this fact:

*"There will be some loss of spending in the immediate area of the site from the existing workers at Centre Point although it is likely this expenditure will be retained in Greater London (the impact area for assessing expenditure impacts). On this basis, the Proposed Development is likely to have a Minor Beneficial, longterm impact on the Greater London economy."*

5.38 It is difficult to see how the ES can conclude that the proposed change of use to solely residential use will have a Minor Beneficial impact on the local economy. In fact on the contrary, it is considered that the loss of at least 2,595 employees and their associated spending in the area will have a Major Adverse impact on the Greater London economy.

5.39 This impact on the local economy is entirely contrary to the Camden Core Strategy which supports the growth areas such as Tottenham Court Road stating that:

*"Development in growth areas such as Tottenham Court Road, and throughout Central London, should contribute to the area economically, socially and environmentally, through providing a substantial number of new jobs and space for businesses;"*

5.40 The existing uses in Centre Point Tower comprising of office, retail and bar / restaurant / events arena all contribute to the area economically, socially and environmentally through the provision of a mix of uses served by high quality public transport. Whereas, the proposed change of use will not contribute towards the local economy and in fact will have a negative impact on the growth potential of Tottenham Court Road.

**c) Loss of an Important Tourism Asset**

5.41 The existing development at Levels 31 – 33 provides tourism benefits through public access to a unique panoramic view of Central London which will be lost as a result of the development. The existing use at Levels 31 – 33 represents the optimum use of the upper floors of the building in that it maximises the sites potential in terms of the views and the location. There are only a small number of buildings in London that have a viewing gallery, similar to Paramount, which is accessible to the public providing 360 degree views of London. Amenities such as the Paramount are a valuable resource and should be protected.

5.42 The Core Strategy identifies that Camden is the third largest contributor to London's economy which is partly as a result of the leisure, entertainment and tourism industry which are vitally important for the Borough's economy. Policy CS8 of the Core Strategy 'Promoting a successful and inclusive Camden economy' states that the Council will secure a strong economy in Camden and *"recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health."*

5.43 The Core Strategy emphasises the importance of tourism in the Borough stating that Camden has an exciting and wide variety of tourist and cultural attractions. The Core Strategy identifies that the visitor economy contributes £566 million per annum and provides around

16,500 jobs in Camden, which constitutes 10% of all tourism related employment in inner London.

- 5.44 The Core Strategy states that the Council recognises the importance of the visitor economy in Camden and will support the continued growth of the sector. The Paramount bar makes a positive contribution to the tourist and cultural offer of London as it provides a bar, restaurant and events arena with exceptional and iconic views across London. This is an important facility that should be protected as an important amenity for residents of London and tourists.
- 5.45 Levels 31 – 33 of Centre Point Tower forms part of London's important attractions which make a significant contribution to economy and enhancing London's visitor experience. The Core Strategy acknowledges the importance of such cultural facilities for residents and tourists, stating at paragraph 9.6:

*"Camden's Central London area is a major draw for Londoners and for tourists visiting the city, making a significant contribution to the attractiveness and economy of both the borough and the capital. Attractions include the British Museum, Covent Garden, Hatton Garden and numerous theatres, bars and restaurants. These are also used by Camden residents and are therefore important local facilities."*

- 5.46 Camden Development Policies Plan (2010) states that the Council will guide tourism development that is likely to attract large numbers of people to Camden's Central London area, particularly the growth areas including Tottenham Court Road. The proposed redevelopment of Centre Point Tower will result in loss of a significant asset for residents and tourists.

#### **d) Deficiencies in the Environmental Statement**

- 5.47 The Environmental Statement has failed to take account of the existing uses of Levels 31 – 33 (bar, restaurant, events arena and viewing platform).
- 5.48 The ES states at paragraphs 1.1 and 1.7 that the Centre Point Tower includes mixed uses comprising of offices and a bar / restaurant. However, these are the only two occasions where the ES refers to the restaurant / bar and at no point does the statement assess the likely significant effects of the loss of these uses as a result of the proposed development.
- 5.49 In referring to the proposed change of use, throughout the ES the document simply refers to office with no mention of the bar / restaurant. For instance, this occurs in almost all sections of the ES including point 1.16, table 1-1, section 3: the alternatives and design evolution which

fails to consider the retention of the bar / restaurant and viewing platform (retention of the office was considered at 3.36 & 3.37), section 4: provides a full description of the proposal yet fails to mention the loss of the bar, restaurant and viewing point despite a number of references to "*Centre Point Tower will be refurbished and changed from office use to residential*", section 6: Socio- Economics and section 7: Transport and Traffic.

- 5.50 This is a particularly concerning omission as the effects of the loss of the business and tourism use at Levels 31 – 33 should have been an important consideration in the ES. In particular Section 3, which assesses the alternatives, failed to consider the existing use and therefore it is not known whether the applicant considered retaining the bar/ restaurant / events arena at levels 31 – 33. The application fails to provide any justification for the loss of this vibrant asset at Levels 31 – 33 which generates 95 jobs and provides a unique attraction for residents and tourists alike.
- 5.51 Similarly Section 6 of the ES assesses the socio economics impacts of the proposal, however the Statement fails to acknowledge the existing bar / restaurant / events arena at Levels 31 – 33, referring only to the office use. An important consideration in this section should be the loss of the 95 jobs currently provided at Levels 31 – 33 and also the loss of an important tourist attraction within the CAZ, where the Development Plan advocates the development of tourist facilities and accommodation.

## 6. SUMMARY AND CONCLUSIONS

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6.1 Government planning policy requires planning applications that conflict with the Development Plan to be refused, unless material considerations indicate otherwise. Material considerations do not exist with this proposal that can offset the levels of Development Plan conflict and overall material harm that this development will cause. This submission respectfully requests that the planning authority refuses planning permission for the proposed development for the following reasons:

- The principle of development is contrary to the Development Plan and causes material harm;
- There will be adverse socio economic impacts, which cannot be satisfactorily mitigated;
- The proposals will result in the loss of an important and unique tourist asset; and
- There are deficiencies in the Environmental Statement.

6.2 From a national policy perspective, the development is contrary to advice set out in the NPPF. Paragraph 51 highlights that commercial buildings should be permitted for change to residential provided there are not strong economic reasons why such development is inappropriate. In this instance, there are strong and wholly justified economic reasons why the application should not be permitted:

- The proposal results in the loss of 28,000sq.m of office development in a location prioritised for business/commercial development;
- The proposal will result in the loss of circa 2,595 existing jobs;
- The loss of employment floorspace and existing jobs compromises the economic strategy for this location which is to create an additional 5000 new jobs. With one development for just 82 homes, the strategic jobs requirement increases by 50% from 5,000 to 7600 new jobs; and
- The proposal is entirely contrary to the objectives of Crossrail and the London Plan which are to optimise the benefits of Crossrail around Tottenham Court Road Station.

6.3 At a regional level, the proposal is contrary to the London Plan. In this regard, the land is identified within the Central Activities Zone, the West End Special Retail Policy Area and the Tottenham Court Road Opportunity Area. The application site therefore lies within a nationally and internationally significant business location which the London Plan has identified for an additional 5,000 new jobs/60,000sq.m of new office floorspace. A development that results in the loss of 28,000sq.m of office floorspace and circa 2,595 existing jobs is in conflict with this strategy and will harm London's economy. There would clearly be a major socio economic

impact with the development as the jobs target would effectively be increased by over 50% to 7,595 and associated land use implications with circa 88,000sq.m of new office floorspace required, rather than the 60,000sq.m required by the London Plan.

- 6.4 The proposal also runs entirely contrary to Development Plan employment policy, as set out in Policy DP13 of the Camden Core Strategy. The policy prevents changes of use from business/employment unless it can be demonstrated that the building is no longer suitable for business use. Given that the building is in active use and currently employs in the order of 2,595 people, this test cannot be met. The applicant has failed to provide any marketing assessment to assess the demand for and suitability of the business floorspace.
- 6.5 The Paramount Bar, Restaurant and Events Area is a significant tourist asset that attracts over 200,000 visitors per annum to view London's skyline. The business employs 95 people and is a successful, thriving business. As such, it should be protected from redevelopment for three flats. The applicant has not even considered the loss of this facility in their Environmental Statement. Policy CS8 of the Core Strategy supports Central London's role, including the Tottenham Court Road Area, in provision of tourism and cultural facilities. The proposal will result in the loss of an important tourism asset, the impact of which should be assessed in the ES.
- 6.6 The Camden Core Strategy requires the Council to resist developments that make inefficient use of Camden's limited land. The proposed change of use of the Centre Point Tower from 28,000sq.m of employment generating floorspace to just 82 homes represents an inefficient use of a high profile building in a PTAL Zone 6 location. The development will result in significant adverse socio economic impacts, many of which the applicant has not attempted to identify, assess and quantify and accordingly, planning permission should be refused.