

25 Southampton Buildings  
London WC2A 1AL

Tel: +44 (0)20 3008 6313  
Fax: +44 (0)20 3008 6314

[www.enyolaw.com](http://www.enyolaw.com)

Enyo Law

Our Ref: MWR/ANH/IAG/PIE3.2/607996.1  
Application Ref: 2013/1957/P  
Application Ref: 2013/1961/INVALID

4 July 2013

Regeneration and Planning Development Management  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 8ND

Direct line: 020 3008 7888  
[marcus.rutherford@enyolaw.com](mailto:marcus.rutherford@enyolaw.com)

**For the urgent attention of the Head of Planning & Amanda Peck**

**URGENT**

Development Control Planning Services  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1H 8ND

**BY EMAIL & HAND**

[amanda.peck@camden.gov.uk](mailto:amanda.peck@camden.gov.uk); [planning@camden.gov.uk](mailto:planning@camden.gov.uk)

Dear Sirs

**PLANNING APPLICATION CONSULTATION**

**Application Ref: 2013/1957/P**  
**Associated Ref: 2013/1961/INVALID**

We act for Century Projects Limited, which owns and operates the Paramount Restaurant and Bar on the 31<sup>st</sup>, 32<sup>nd</sup> and 33<sup>rd</sup> floors of the Centre Point Tower at 101-103 New Oxford Street, London WC1A 1DD.

We write regarding the above planning applications made by our client's landlord, Almacantar (Centre Point) Limited, in relation to Centre Point Tower, Centre Point Link and Centre Point House, at 101-103 New Oxford Street and 5-24 St Giles High Street, London, WC1A 1DD. We understand that these applications are due to be considered by Camden Development Control Committee at a meeting at the Town Hall on Judd Street at 7pm this evening.

The purpose of this letter is to advise you that, in relation to these applications, the Council should follow the procedure outlined in the Town and Country Planning (Mayor of London) Order 2008 (the "**Order**") for an Application of Potential Strategic Importance. The proposed development falls within Part 3 Category 3E of the Schedule to the Order, as it is contrary to Policy DP13 of the Camden Core Strategy (2010) (the "**Development Plan**") and provides 8,155 square metres of Class A1, A3 and A4 development.

607996.1

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."*

We note that the report to Camden Development Control Committee indicates that the planning officer does not consider the planning applications to be contrary to the Development Plan nor inconsistent with Policy DP13. This is manifestly not the case.

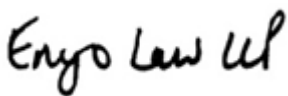
Centre Point is currently occupied by a large number of diverse businesses and, whilst we cannot speak for all of those businesses, our client (which operates one of the largest businesses at Centre Point) considers the building to be fit for purpose and intends to remain trading from it for the entirety of its 36-year lease. Accordingly, the proposed change of use to non-business is not justified, and the planning applications are clearly in breach of Policy DP13.

In addition, the planning applications are also contrary to one of the stated core objectives of the Development Plan, which commits the Council to *"safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers."*

If Camden Development Control Committee is minded to grant its consent to the planning applications, the Council should consult the Mayor of London, in accordance with the Order. A failure to do so may result in a judicial review of the decision on grounds that the local planning authority failed to recognise the fact of the development falling within Part 3 Category 3E of the Schedule to the Order. Such proceedings would have significant time and cost implications. We have therefore written to you urgently in this regard, to ensure that you are fully aware of the situation.

We should be grateful if you would kindly acknowledge receipt of this letter.

Yours faithfully



**Enyo Law LLP**