

From:

Sent: 28 June 2023 14:12

To: David Fowler

Cc: Bethany Cullen

Subject: Selkirk House planning application: formerly 2021/2954/P; now 2023/2510/P

Dear Mr Fowler

I refer to your email of 23 June.

I expressly reserve my position in relation to the stance Camden proposes to adopt towards valid concerns already expressed about the proposed skyscraper and the entirety of the composite proposals, originally part of application 2021/2954/P (subsequently revised) and now resubmitted (with very minor modifications) as 2023/2510/P.

In particular, I consider that it would be unreasonable for Camden to disregard the following underlying facts, of which it is on clear notice:

- the concept of a skyscraper on a site adjacent to, overshadowing and out of proportion with, the Bloomsbury Conservation Area, only yards away from St George's Bloomsbury and which would be very conspicuous from (to take just two examples) both the British Museum and Bedford Square, is inherently controversial;
- There is overwhelming opposition from local residents and from amenity and heritage groups to the erection of a skyscraper on part of this site, with the adverse impact it would have on the rest of the parcels subject to the application, the Bloomsbury Conservation Area and on city views more generally;
- Camden has conducted its own site allocation consultation, which includes these plots, and has published the results of this exercise, which reinforce the points summarized above, as well as drawing attention to Camden's own inconsistencies in proposed policy application;
- The wholesale (and potentially dangerous) demolition and reconstruction involved in the BC Partners proposals, when viable alternatives exist, are hard to reconcile with any serious respect for the Council's Climate Action plan;
- There is no local support for the Vine Lane proposal embedded in the application. This appears to be an attempt by the developer to facilitate an impractical vanity project supported by some Council officers. I note that this concept is part of a consultation on the "Holborn Vision" which is currently paused, so that any approval of the Vine Lane aspect of the

developer's proposals would represent an attempt to pre-empt the outcome of an uncompleted exercise in local democracy. There are also huge ambiguities about the status of the proposed Vine Lane and whether security concerns would require it to be gated.

This approach you are adopting is all the more unreasonable in circumstances where the Council has to date gone along with the express decision by Labtech and BC Partners to dispense with any public consultations on their main proposals. I note you state in your email that:

We have encouraged Simtem to undertake their own consultation.

What will you do if Simten continue to ignore this clear published policy? I would submit that in such circumstances it is incumbent on the Council proactively to ensure there is a full opportunity (and adequate time) for public awareness and consultation. Hence the alternatives in my email of 20 June; I note you do not refer to them.

Furthermore, I note that you have made the task of making properly informed submissions all the more difficult by declining to extend the consultation period for these highly complex, controversial proposals. We have been seeking answers to many important questions ever since the 2021 application was submitted, without getting substantive answers from Labtech, BC Partners or Simten.

In these circumstances I consider that there is a serious risk that the Council decision makers will misdirect themselves in the application and weighting of their published applicable policy issues and in the decisions they reach.

I am also concerned that the application is premature and that, if it is processed in coming weeks and granted in whole or in part, many important outstanding issues, potentially having significant adverse effects on local residents, would be deferred to be dealt with subsequently in an opaque fashion, without any proper engagement with those affected.

Some of these outstanding issues emerge from the results of my Freedom of Information request. I will be following up separately on some of these. The results indicate the close collaboration between Camden's officers and BC Partners (or its agents) in formulating these proposals. In these circumstances, it will be important for Camden to be able to demonstrate objective review of the proposals and all submissions on them, as well as the application of all relevant policies and principles.

Regards,

Peter Bloxham

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