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Queen Alexandra Mansions
Grape Street
London WC2H 8DX

Edward Beaver
Simten Limited

14 November 2023

By email

Dear Mr Beaver

Labtech. BC Partners proposals for Selkirk House and adjacent plots: listed Buildings and Planning Applications

I acknowledge receipt of your letter dated 9 November 2023.

I suspect that, although addressed to me, it is really intended for Mr Fowler's benefit, so as to attempt to support his somewhat contentious claim in the report he has prepared for the committee meeting on 16 November that:

*The applicant was strongly encouraged to undertake their own consultation prior to submitting the application, **and did so** (emphasis added).*

I note in passing that even this assertion does not suggest that there has been any **public** consultation.

I can understand your need (as well as that of the officers at Camden) to do your best to try to argue that there has been public consultation. Perhaps the Asian Women's Resource Centre would agree that they were consulted on the limited number of rather minor matters included in the scope of the meeting held on 25 January 2023, a session to which you chose not to invite SMS or any of its individual members. You have refused to repeat the session for the benefit of SMS and others rather more directly affected by your client's proposals. You have also failed to put us in contact with the Asian Women's Resource Centre, as requested months ago.

You refer to the SCI submitted as part of the application documents. This is an artful and misleading confection. SMS has comprehensively refuted its pretence of genuine public consultation.

I acknowledge that, chronologically, the meeting on 7 September 2022 followed an introduction you had made to a small number of people (seemingly selected at random).

You refer to "key stakeholders", which evidently excluded many residents and businesses likely to be affected by your proposals.

The September 2022 meeting was organised by SMS, in the absence of any initiative by BC Partners to arrange a meeting. It was a disappointment that BC Partners chose not to attend. This was the first instance of BC Partners using you as a professional shield.

I cannot criticise you for not being familiar with the very explicit statement by Mr Watson of Labtech on the zoon organised by SMS on 15 April 2021. This may have contributed to the inaccuracies in your correspondence.

During that April 2021 session, Mr Watson made two assertions:

- That Labtech had decided not to carry out any public consultation on the most significant aspects of the proposals; and
- That this approach had been agreed by Camden.

Lack of responsiveness on the part of Labtech, yourselves and Camden have prevented getting to the bottom to the claim that Camden had approved Labtech's decision to dispense with public consultation.

You may also have failed to inform yourself as to the outcome, reported by Camden, of the Camden Site Allocations consultation (insofar as it relates to the sites included in the current applications).

You assert that you are "directly involved in dialogue". It is evident that you have been in extensive dialogue with Camden, but the instances of dialogue with residents and SMS have been very few. One of them, originally requested in January, took until September to take place. The net result of this process would appear to be the elimination of one window in your massive proposed development.

The one meeting you did organise on 31 May this year was acknowledged by your colleague not to be a consultation, but to be for the unilateral supply of information as to proposals already agreed between Camden (at least the planning team; it is less clear whether they had been endorsed by the Listed Buildings team, despite that fact that the plots reported on by Simten at that meeting included listed buildings) and yourselves. Local Councillors attended that meeting, of which there are contemporaneous notes.

You state that you are best placed to respond. That may be correct and simply leads to the question why you have left so many emails and questions, submitted over the course of the months, unanswered. I acknowledge that you have attempted in recent weeks to deal with a small number of more recent questions. That represents a recognition of previous failures and leaves many important issues unresolved. I have on at least two occasions earlier this year sent you a list of unanswered questions.

As to your comment that:

We remain happy to meet to discuss the scheme,

to include this in a letter sent a week before the hearing makes absolutely clear that the only sort of "discussion" you are prepared to have is on the basis of a *fait accompli*. This is no consultation.

Your use of “remain”, in context, represents a considerable stretching of the common usage of that verb.

I hope that the applications will be rejected on Thursday and that this may induce you finally to engage in a proper consultation and genuine dialogue on your controversial proposal, and on alternatives. I note you have been advised that your proposals in their current form are not even viable.

I stand by my letter of 19 October, both for the purposes of the hearing on 16 November and any subsequent processes. I have reserved my position.

I am copying Mr Fowler and BC Partners.

This is an open letter.

Yours sincerely

Peter Bloxham