

General statement on business neighbourhood designation, our consultation process, membership procedures and future consultation strategy

General Statement on designation as a Business Neighbourhood Area

Following discussions with London Borough of Tower Hamlets (LBTH) the applicants on behalf of the prospective forum have considered carefully the merits of the proposed *Spitalfields Neighbourhood [Planning] Area* being designated as a Business Neighbourhood Planning Area (BNA).

We have evaluated the changes which such a designation would imply upon the future workings of a planning forum in Spitalfields and have discussed the options internally and with experts from DCLG and business neighbourhood fora in other London Boroughs. Consequently we can see no reason why designating us as a BNA would be of detriment to the aims and objectives that we have and, in addition, we have identified a variety of significant potential benefits.

We have therefore resolved to formally request that LBTH designate the whole area (which we originally applied for designation on 1st December 2014 as a neighbourhood area) as a Business Neighbourhood Area.

The applicants on behalf of the prospective neighbourhood planning forum considers the area to meet the requirements for designation as a BNA and will outline below their reason for this appraisal:

Reason 1 - Appropriateness as a business area

The applicants agree that designation, as a BNA, not only captures the range of businesses within the area, it also adheres to LBTH Core Strategy and adopted proposals map which identifies key areas within the neighbourhood area as Business Districts and Central Activity Zones. Areas such as Spitalfields Market, Old Truman Brewery Site (OTB), Brick Lane and other streets with active frontages are just examples of the wide range of businesses within the area. With a residential population of about 3,500 imbedded among areas that promote business activity it is factual to say that the area would benefit from being designated as a BNA because the interests of local businesses including those of one of our stakeholders would be represented fully at each stage. Businesses within the Spitalfields Area are key players in the economic growth of the area and should therefore be part of the forum. We acknowledge that substantial parts of the proposed neighbourhood area could be seen to be either wholly or predominantly business and, as such, it would seem appropriate for the whole area pending designation be designated by LBTH as a Business Neighbourhood Area.

Reason 2 - Other business areas

Following research it would be fair to say that the Spitalfields Neighbourhood Area contains substantial zones within it which are wholly or predominately businesses interspersed with zones which are mainly residential and therefore, mindful of numerous similar designations elsewhere, we feel there are strong grounds to designate the whole area as a Business Neighbourhood Area. Active street frontages and designated business areas within the Local Development Framework sets out the LBTH visions of business areas and this would further be supported by the designation of the Spitalfields BNA. Beyond this borough there are many salient examples of similar mixed neighbourhoods being designated as Business Neighbourhood Areas. Examples of this include, but are not limited to, Soho, Mayfair, Marylebone, St. James's, Fitzrovia and Hyde Park & Paddington (in Westminster), Bankside (in Southwark), Southbank and Waterloo (in Lambeth and Southwark) and West Ealing Centre in Ealing, to name a few. These business neighbourhood areas have been designated by LPAs in central London and have almost an identical mix of business and residential areas to that found in Spitalfields. They are just some other nearby examples of joint business and neighbourhood areas that clearly demonstrate the joint approach in dealing with residential matters alongside business matters which we are convinced could be emulated in a Spitalfields Business Neighbourhood Area. In all these applications the campaign to establish a business neighbourhood forum and area originated in grass roots community and amenity groups in much the same way our proposals were formulated.

Reason 3 - Key stakeholders

A designation in favour of the Spitalfields BNA, as opposed to simply a Neighbourhood Area, would allow key stakeholders from the business community such as the Old Spitalfields Market, OTB and the many hundreds of independent small businesses such as curry houses, independent retailers, new start-up, small business and hi-tech, to name just a few, to have an input equal to that of local residents at every stage of the process. Many people who work in the area would, under our original proposals, be able to have a full role in the life of the forum as forum members and participants; however in a BNA local businesses are also entitled to vote in a referendum of local non-domestic rate payers following the formulation of a viable neighbourhood plan proposal by the forum. We believe that this additional area of equality is eminently desirable and, accordingly, we would regard designation as a Business Neighbourhood Area to be both sensible and appropriate.

We feel strongly that the whole area should be designated as a business neighbourhood area because this is the area we had consulted upon and it was clear to us that this whole area was considered to be appropriate for designation as a Spitalfields Neighbourhood Area by local residents. We think that the added protection for business interests inherent in a BNA would enable the local identity of residents and business to be harmoniously and symbiotically reflected. We recognise that business is a key component to Spitalfields and places wholly or partially characterised by business use are interspersed between wholly or predominantly residential zones which have a strong sense of community; a Spitalfields community rooted in this mix. In this aspect we are very similar indeed to the City of Westminster and similarly mixed neighbourhoods such as Victoria, Fitzrovia and Marylebone (etc) and which are almost our mirror image on the other side of the City of London.

In furtherance to this argument; designation as a BNA will not only benefit local businesses themselves but it can also allow for a strategic approach to jobs provisions and training which has been identified within our application for designation. Having a joint approach will allow for cooperation and collaboration at a level which would promote economic growth within the Spitalfields Area and a structured system of local cooperation. This would be further enhanced by a well-developed system of continuous local consultation while creating planning policies so that forum outcomes are supported by both the business and residential communities alike.

For the reasons outlined above the applicants for the prospective forum and area fully support its designation as the Spitalfields Business Neighbourhood Area and Forum.

The applicants would therefore like to formally request LBTH designate the area and the forum, which we have applied for LPA designation, be designated as the Spitalfields Business Neighbourhood Area and Forum.

Supplementary points regarding the Neighbourhood Area

There are many points made in the Truman Estates Ltd. document dated 16 February 2016. There are several specific points which we would like to challenge in this response. The Truman Estates Ltd. document claims that the OTB site is “entirely separated from the surrounding area” which we think is an odd thing to say because Brick Lane runs right through the centre of that site and Brick Lane is the main thoroughfare of Spitalfields; the site could not be more connected and more central to the rest of Spitalfields if it were designed with that purpose in mind. Further to this point, local people, business operators and residents alike regard the OTB site to be the heart of Spitalfields and cannot imagine any definition of the area without it. It would tantamount to attempting to remove John Lewis from Oxford Street or Harrods from Knightsbridge and claim it was a separate neighbourhood. The same document by Truman Estates Ltd. also tries to compare the OTB site with the Bishopsgate Goods Yard site and argue that the OTB site should be regarded as a strategic site and excluded “on the same basis” as the Goods Yard. We reply saying there is no “same basis” or similarity whatsoever between the two sites because the Bishopsgate Goods Yard site is wholly derelict and has a pending planning application for massive redevelopment of the entire site; the OTB, on these bases, is utterly different.

We acknowledge that there are some differences in form across the proposed business neighbourhood area but in an inner city area that is to be expected and, in general, the area is a cohesive whole. Very similar circumstances can be

found in other NBAs in places like Westminster, Camden and Southwark. Some Neighbourhood Planning policies recommended in due course by the Forum would suit the whole area while others would be tailored to suit particular zones, places, sites and streets in our diversity. This approach is not unusual, indeed, there are neighbourhood plans for whole towns varying greatly from side to side exist. Spitalfields BNA would share many characteristics with numerous neighbourhood areas in central London which have been designated in places like Westminster, Camden, Southwark and Lambeth. Our size ought not to be prohibitive either because the legislation permits neighbourhood areas of any size; one neighbourhood area in Cumbria, for example, covers seventeen parishes over 470 square kilometres! Closer to home, Highgate Neighbourhood Area (in Camden) has an area of approximately 600 hectares which when compared to our proposal reveals our 44 hectares to be rather modest. Our size in terms of population is not at all unusual either; we have around 3,500 residents in the proposed area (quite a lot smaller than the average council ward) which compares to Southbank and Waterloo Business Neighbourhood Area which contains 12,000 residents and Winsford Neighbourhood Area, in Cheshire, which has over 31,000.

We firmly believe the area which we have proposed, have consulted upon and which was endorsed by local people at our AGM is a good area to plan for and we fervently hope that the *Spitalfields Business Neighbourhood Area* and *Forum* will be designated by Tower Hamlets in due course.

General statement on our consultation process and membership procedures

Our consultation was organised in three stages:

1. Information gathering and informal discussions leading to the creation of a map of useful networks
2. Formal public consultation meetings with local stakeholders
3. Formal public consultation meetings with the general public.

Stage 1: A process of information gathering and informal discussions with local experts, membership organisations and networks.

This initial process (which began in November 2013) went through the following stages:

1. The Spitalfields Society liaised with its members about the merits of establishing a neighbourhood forum
2. The Spitalfields Society liaised with other local groups to gauge the level of local support; these groups included:
 - a. Spitalfields Community Group (SCG)
 - b. Saint George Residents' Association
 - c. Cloisters Residents Association
 - d. Friends of Christ Church
 - e. Brick Lane Restaurateurs Association
 - f. Spitalfields Small Business Association
 - g. East End Trades Guild
 - h. Woodseer & Hanbury Street Residents' Association
 - i. Elder Street Residents' Association
 - j. Burhan Uddin House TRA
 - k. Spitalfields Regeneration (SPIRE).
 - l. East End Preservation Society
 - m. Spitalfields Historic Buildings Trust
3. Meetings were held with Helal Abbas the senior ward councillor at the time (he lost his seat in May 2014) who had represented the Spitalfields & Banglatown ward for more than twenty years and, in addition, was the chair of the LBTH Strategic Development Committee and a former leader of the council. Informal meetings

were also held with a number of individual residents from a variety of ethnic, age, education and cultural backgrounds and prominent business operators

4. An initial group of six activists (including a *Mayor's Community Champion Coordinator* for Spitalfields and Banglatown) were drawn from the executive committees of the Spitalfields Community Group and the Spitalfields Society (three from each) who had shown the most commitment and enthusiasm. They included both residents and business operators. Together they formed the *Interim Steering Group* (ISG) to drive the project forwards. This group of six then expanded to eight when it was joined by the Chairman of the Spitalfields Ward [Policing] Panel and co-founder of St. George Residents' Association plus the Director of the Attlee Youth and Community Centre, a very important community asset which reaches out to young people mainly from the British Bangladeshi community.
5. Members of the ISG then had informal conversations with officials such as Jenny Frew at the Department for Communities and Local Government (DCLG) and then formal correspondence with planning officers at the London Borough of Tower Hamlets (such as Peter Farnham) about best practise when establishing neighbourhood forums. The ISG also took guidance from representatives of East Shoreditch Neighbourhood Planning Forum, West Ealing Centre Business Neighbourhood Forum and Queen's Park Community Council. Members of the ISG also attended Locality/DCLG conferences, and joined the LinkedIn Neighbourhood Planning network.
6. The ISG devised a proposed constitution based on the one adopted by East Shoreditch and then began to contemplate its boundaries.
7. Using a variety of local contacts the ISG began to draft a list of local "stakeholders" whom it would aim to consult with as early as possible regarding neighbourhood planning in Spitalfields. Particular regard was paid to ensuring we would reach ALL sections of the community, particularly hard-to-reach sectors. This list was created using our own developing knowledge as well as reaching out to groups such as the Tower Hamlets Council Volunteer Centre, Toynbee Hall and extending our contacts to a wider list of local groups involved in the public consultations on the Bishopsgate Goods Yard development (list produced by Soundings for Ballymore/Hammerson) and via these sources we put together a list of about 75 local organisations, resident groups and notable business interests in the area which would be our "stakeholders". This group was not 'set in stone' but was fluid as more names were added and some which were inactive were removed.
8. We decided to have two major meetings prior to the main Forum establishment meeting; first a Stakeholders' meeting which would be highly detailed because the people attending would be more familiar with the themes being discussed. Invitation to a second meeting, later, would be extended to all local residents, organisations and businesses based in the proposed area and the content would be less complex. We agreed on this strategy because we calculated it would make the process as accessible and as meaningful to as broad a spectrum of people as possible *and* would facilitate stakeholders, whom we had identified, to spread the word to third parties known to them which were more difficult for us to reach directly and who would then have the opportunity to attend the second meeting.
9. The ISG geared up its website, response system and presence on social media.
10. The Stakeholders were each written to four times in June and July 2014 and invited to attend the special stakeholders' consultation meeting on 21 July 2014. We envisaged there would be a separate consultation meeting for the general public held in August after the stakeholders' meeting to which all the people who lived and worked in the area would be invited through the various networks run by Stakeholders PLUS a major leaflet delivery operation. Our leaflet also provided much useful information about what neighbourhood planning was. Our decision to create a leaflet and deliver it door to door is atypical in neighbourhood forum and area consultations but we went this extra mile because we wanted to be confident that our message would reach beyond the people who usually get involved in local initiatives and be heard by the "hard to reach" communities.

Stage 2: Formal public consultation with major "stakeholders"

On 21 July 2014 the formal consultation process began. The consultation meeting was long and included detailed and technical planning information which was tailored to suit local stakeholders who were familiar with such themes. Around forty local stakeholders attended ranging from tenants associations, homeless hostel operators, the police, major business operators and councillors. A full list of attendees is contained in the appendix to this letter but among the people present was Mr. Jason Zeloof whom we had written to in June and represents the family that own the Old

Truman Brewery site and some other buildings in the local area. It may be worth comparing the attendance at this meeting to the Local Community Ward Forums organised by Tower Hamlets in the ward over the past few years - the largest attendance at any of these meetings so far has been just *five* local people.

A key part of the stakeholder meeting was our message to go and spread the word to colleagues, neighbours, members and associates. We repeatedly emphasised to the persons present that they should let their networks know what we were proposing and encourage as broad a range of participation as possible; it was in their interests to do so. We took feedback from the people at the meeting and responded to suggestions to change the boundaries; e.g. include the Spitalfields City Farm. Nobody at this meeting suggested removing any part of the neighbourhood area or reducing its size. The feedback from this meeting was reflected upon at a meeting of the ISG a few days later.

Stage 3: Formal public consultation with people who live and work in the neighbourhood area

The general public, by which we mean local residents and people working in the area including business operators, were notified about our proposals in the following ways:

- Direct deliveries of the leaflet *Your Spitalfields: Your Future* to their homes and workplaces
- Social media (Facebook and Twitter)
- Word of mouth via third parties who had already been engaged with us during Stage 1 and 2 of our consultation process
- Via membership of residents and community groups

We began delivering leaflets to local households in early July and most of the neighbourhood area had been delivered to by the time of the stakeholders meeting on 21 July.

Since finishing our consultation it has become clear to us that notifying local people about plans to establish a neighbourhood forum through the distribution of leaflets delivered to every local resident and accessible business is an unusual thing for prospective forums to do. We are very proud of our success in this area and we think this should stand as testament to our good intentions. The accompanying map shows the buildings (residential, business and other) to which our small team of volunteers delivered printed leaflets. As you can see we delivered our leaflets to very nearly every address in the envisaged neighbourhood area. We estimate that the proportion of local households who were delivered a leaflet to be around 90%. We delivered a total of 1,652 leaflets to letterboxes (both business and residential) in the neighbourhood area in July and August 2014. While we aimed to deliver, as far as we could, a leaflet to every letter box we accept that there are limitations. It is the case with some particular buildings that access is so restricted as to become impossible to the uninformed. This is most often the case with the most expensive apartments in the neighbourhood; such residences are often “gated” or controlled by a concierge service and leafleting a few of these places (for example a small group of access-controlled condominiums on Strype Street and Cobb Street and another ‘exclusive’ development on Calvin Street) was attempted and failed. Similarly, some large offices have a single point of delivery and it depends on the attitude of the person on duty as much as to the systems they have in place as to whether the leaflets received get beyond the front desk. Some businesses do not have any accessible front door/letterbox for personal delivery.

Reaching ‘Hard to reach’ communities:

Our focus on “hard to reach” communities was acute. The close involvement of the Attlee Foundation with our work almost from the onset ensured that reaching such communities remained paramount in our minds. We identified three main areas where such communities predominated; the Holland Estate; Wheler House on Quaker Street; and the Flower & Dean/Thrawl Street estate.

To do our best to ensure we contacted people living in these places we wrote to all the social landlords which owned property in the area. This included Tower Hamlets Homes, Spitalfields Community Housing Association, East End Homes, Genesis Housing, One Housing, Toynbee Hall, Holland Estate Management Board, and Newlon Housing Association. These organisations were invited to attend our stakeholders consultation meetings and engage with us either in writing via email or otherwise. This initiative led to Spitalfields Community Housing Association formally joining as a full forum member, by agreement of its board, and, also, by the Vice-Chair of the Holland Estate Management Board (Yolanda de los Bueis). Further to these efforts, we hand delivered leaflets to each and every home on Flower and Dean, Thrawl Street, Wheler House and the Holland Estate (Brune, Barnard and Carter Houses).

Despite several attempts we were regrettably unable to gain access to much of the Wentworth Residence building on the south side of Wentworth Street.

Local places of worship were also targeted. The BBC Community Centre and Mosque located on the Holland Estate was emailed twice and handed a leaflet directly. The Brick Lane Jamme Masjid was also emailed twice and a leaflet was handed, personally, to the manager and the initiative explained to him. The Bangladesh Welfare Association, Kobi Nazrul Community Centre, Sylhet Divisional Welfare Council, Futureversity, Bishwo Shahitto Kendo, Baishakhi Melha Trust, Alternative London and Heba Women's Project were all written to (on several occasions) inviting them to attend our public meetings. We are confident that our strenuous efforts in these areas meant that the hardest to reach communities were by and large reached. These efforts led to the close and continued involvement of Tarik Ahmed Khan, who leads an organisation focused on local youth called SOUL and also directs a local football team. We also wrote to Providence Row, the homeless charitable organisation, Hopetown Hostel and Health E1; Health E1 attended the stakeholder meeting. We were delighted when Mike Myers – who has lived in Spitalfields for eighty-seven years (far longer than any other person) and is chairman of the Spitalfields Market Residents Association, opted to join.

Local publicans have become active participants and through these people word of mouth can spread to hard to reach customers visiting their establishments; we delivered leaflets to each of the pubs and were pleased when three local publicans including Sandra Esquilant (who has run the *Golden Heart* since 1979) decided to join. Further to this, the two active Mayor's Community Champion Coordinators in the Spitalfields and Banglatown ward – Junior Mtonga and James Frankcom – are both forum members. In addition to these efforts we wrote on three separate occasions to each of the four local councillors who represent the areas covered by our proposed business neighbourhood area; subsequently two of these councillors decided to join as forum members (Cllr. Abdul Chunu Mukit and Cllr. John Pierce). We are aware that our meetings occurred during Ramadan but we were following a timetable which had been set by Tower Hamlets and which we have correspondence to prove. We had been advised in early-2014 that the deadline for us to submit our designation application forms by would be 1st September 2014; beyond that we would need to wait another six months. The timetable was subsequently amended by Tower Hamlets during the summer but we were not notified of this change until we had already set in motion our own agenda and spent our grant money on date sensitive publicity material. We were keen to maintain momentum and anxious about how far our very limited resources would stretch and so ultimately we opted to proceed with the timetable we had. We did this in consultation with a number of Bangladeshi supporters who understood and supported our approach. It was felt that Ramadan would not necessarily be an impediment to people being made aware of our proposals (via the leaflets) and engaging with us either through attending one meeting during the holy month or using other means at their disposal such as writing to us via email, using the detachable correspondence sheet or via social media et cetera. We also contacted Sandy's Row Synagogue and, indirectly, Jeremy Freedman, whose family has administered that ancient religious establishment for generations, joined the forum as a full member.

Local Business

With regards to businesses, access to shops and business premises with individual street access is relatively straight forward and a leaflet can be swiftly delivered. All the shops and restaurants along Brick Lane were given leaflets and other front-access shops, offices and restaurants along Wentworth Street, Commercial Street, Hanbury Street, Brushfield Street, Lamb Street and elsewhere were similarly hand delivered a leaflet explaining what we were proposing and where to get further information. Larger businesses were telephoned and efforts made to explain our plans. The offices of Allen & Overy were given a leaflet to forward to the appropriate person. In addition, we arranged a meeting with Andrew Turf who represents the current owners of Old Spitalfields Market; Ashkenazy/Tribeca Holdings. At this meeting in June 2014 he expressed his support for our proposals and joined the forum. He was invited to both of our consultation meetings and attended and participated at the Forum AGM held in August 2014. In addition we also invited the Spitalfields Small Business Association, Brick Lane Business Association, Brick Lane Restaurateurs Association, Tower Hamlets Street Markets, and the East End Trades Guild to join as forum members and invited them to circulate material from us to their members. The East End Trades Guild attended our Stakeholders meeting and the Brick Lane Restaurateurs Association joined. We obtained a list from the Volunteer Centre Tower Hamlets of local groups and attempted to contact all of them and we also worked with Toynbee Hall to spread the news. As well as these efforts, the membership of large local community and amenity groups such as the Spitalfields Society and the

Spitalfields Community Group contain numerous local business operators who were made aware of our initiative by those groups. Those groups have also both joined *on behalf of their members*.

Statement on our consultation process with a focus on the businesses at the Old Truman Brewery

During stage 1 of our consultation process we engaged directly with Jason Zeloof who is a member of the family who collectively own and control the Old Truman Brewery site and, through several related companies, acts as employer or landlord to several hundred people. The precise number of businesses on the Old Truman Brewery (OTB) site is uncertain. The OTB website (please see a screen print of this in our appendix) says there are “over 200” businesses on the OTB site. Correspondence made by representatives of the OTB site and one of their business tenants, Brown & Pletts, have stated that there are five hundred. This enormous discrepancy is hard to fathom; presumably the information they make public on their website is correct which says the figure is closer to two hundred. There are market traders who operate stalls at various times but although these traders do business on the OTB site once or twice a week they cannot be said to operate their businesses exclusively from the OTB site and, as such, are not “based” at the OTB site. For the most part, these stall holders operate variously at a number of different sites across London (such as Camden Lock) and it would be inappropriate to make an exact comparison with this rather transient group of traders and the operators of, say, a curry house, bar or shop who operate a fixed business based in the neighbourhood, pay local business rates, often employ local staff and have a much more durable investment in the neighbourhood. Nevertheless, markets are a highly valued and important component of the Spitalfields mix. Reflecting this, during our consultation, we liaised with LBTH Market Services (who offered to join but as a part of a statutory body we were advised they could not) wrote to the email address for “Upmarket” who operate this part of the OTB site for the various Zeloof family owned companies and we did not receive a reply. We also wrote to Mr. Jason Zeloof who is the public face of the Zeloof family that own all or most of the OTB site through several closely associated family-owned companies.

As we made clear in our application for forum approval and area designation, it is our firm belief that Jason Zeloof was and continues to be thoroughly included within our ongoing and actively reflective consultation process. This has been true from the onset and evidenced through his attendance at the stakeholder consultation meeting in person (on 20 July) where he had observed a long presentation on the proposed bounds where the inclusion of the OTB site was made absolutely clear; at the end of that same meeting had completed an application form to be a member of the forum. In addition to this many emails were sent by the ISG to the owners of the Old Truman Brewery (as well as one of their subsidiaries ‘Upmarket’) on June 15th, June 22nd, July 7th and July 18th and each email included maps that clearly showed the Old Truman Brewery to be within the bounds which the ISG envisaged at that stage to be a desirable neighbourhood planning area. At no stage over this period was any comment, reservations or concern about our proposals expressed by him or anyone else representing his company, tenants or employees. Indeed, after the consultation meeting which the owners of the Old Truman Brewery attended, as aforementioned, additional correspondence and information was sent to him as their representative by the ISG on 1st August, 6th August and 13th August. The basis for the ISG endeavouring with this communication between it and Mr. Jason Zeloof was that he had made it clear to us that he was the most suitable person for us to talk to who could represent the interests of the web of associated family businesses which together own the Truman Brewery site (as well as a number of other local properties) and the tenants and employees therein. Therefore, for him to say that he was not consulted is, in our view, quite unreasonable.

There are a strongly connected group of companies which own and control the Old Truman Brewery site. Their ownership is worth consideration because it has locum for the objections made and should be examined for the sake of transparency:

- Old Truman Brewery Limited (It has one director: Jason Zeloof)
- Truman Estates Limited (directors: Ofer Zeloof, Sassoon Raymond)
- Zeloof LLP (directors: Jason Zeloof, Ofer Zeloof, Oren Zeloof and Amira Zeloof)
- 93 Feet East Limited (directors: Jason Zeloof, Ofer Zeloof)
- Avonsand Asset Management (directors: Ofer Zeloof and Amira Zeloof)
- Fashion East Limited (directors: Ofer Zeloof and Jason Zeloof)
- Ely and Sidney Limited (directors: Ofer Zeloof and Jason Zeloof)

The businesses named “Zeloof LLP” and “Truman Estates Limited” both submitted objections to neighbourhood area and forum. While the ownership of Zeloof LLP is clear by its name, the objection made by Truman Estates Limited was opaque and made no reference to the fact a Zeloof brother is one of its two directors. Of the main property holding companies on the site there is only one which has a director who is not a Zeloof; interestingly this particular ‘business’ appears to have no assets, no income and no liabilities according to publicly accessible records; the person in question is Sassoon Raymond who runs “Trusec” which is a security guard company based at the OTB that protects the site. We believe that because all these companies are controlled by the same family and that the objections they make are all the same then for the purposes of public consultation they should be treated as a single objection made by what is a very small group of people whom all, bar one, are close family relations.

At the stakeholder consultation meeting, which Jason Zeloof attended in person, all the attendees were urged to “help spread the word” and tell their associates, employees and neighbours. Jason was quite happy to represent all the people who worked at the OTB site and even attended the second Public Consultation Meeting but left before it began after establishing that the content of the meeting was fundamentally the same. He did not register any concern or objection at this stage. In addition, only a few days after the stakeholder consultation meeting (which Mr. Zeloof had attended in person) fifty leaflets detailing our proposals were hand delivered by us to the OTB offices which act as an entry point for businesses at 91 Brick Lane (which include Old Truman Brewery Limited, Zeloof LLP, Truman Estates and Brown & Pletts), for general circulation. These leaflets were handed to the security guard/receptionist who mans the reception and receives mail and other similar deliveries. We also handed separate leaflets to businesses with their own access points e.g. the Vibe Bar, All Star Lanes, and the Big Chill Bar who are all tenants in Zeloof-owned properties and together constitute a very substantial portion of the OTB site. The manager of Big Chill Bar decided to join the forum as a member.

In addition to these direct contacts it is abundantly clear that word *did* get around the people who work at the Old Truman Brewery through ‘third parties’ because in early August twelve separate individuals employed by Zeloof LLP and Truman Estates Ltd. let it be known to us that they wished to join the forum. These people made no objection to the boundaries and when one of our number spoke to a couple of these people on the telephone they told him that an email had been sent around to “everyone at the Old Truman Brewery” which said the forum was “something we should support” and urged as many people to join as possible.

Josephine Pletts (a partner at Brown & Pletts Architects who are tenants at the OTB site) attended the Public Consultation meeting and said that she found out about the meeting through a third party. We are glad she found out through a third party because that is what we had asked the ‘second parties’ whom we had invited to come to the stakeholder meeting to do – tell other people! The people who came to the first meeting told other people who came to the second meeting and by so doing spread the word to people like her who may not have letter boxes easily accessible to our volunteer deliverers.

Clearly notice of our proposals had reached the businesses at the OTB site and there was an opportunity for them to be as informed as they wished. In addition to word of mouth, the leaflets and the meetings we also have a website which any person can access at any time for accurate and detailed information about our proposals. A search of Google for the terms “Spitalfields” and “Forum” brings this up as the first hit.

After Mr. Zeloof had suddenly and completely changed his mind about the benefits of the forum we began to hear from some of his tenants and employees and the response they gave suggested they did not fully understand what neighbourhood planning was. When we asked a couple of them questions about what they thought the neighbourhood forum was about the response we got was very concerning; several tenants told us how they had received an email urging them to object to the neighbourhood area because “you would change our opening hours and increase our rent.”

An issue raised in the Truman Estates Ltd. objection document (16 February 2015) which we feel ought to be challenged is the assertion that Truman Estates Ltd. were not invited to the Stakeholders Consultation meeting on 21st July or any subsequent meeting. We think this statement is deeply misleading. This is because Truman Estates Ltd. has two directors; Mr. Ofer Zeloof (the elder brother of Mr. Jason Zeloof) and Mr. Sassoon Raymond. We wrote to Jason Zeloof (his email address is jason@trumanbrewery.com which you will note is at the ‘trumanbrewery’ and not at Zeloof LLP) on the basis that he was the only point of contact local people had and, at that time, we did not know the full details of ownership at the site. We approached Jason as a member of the family who together own the Old Truman Brewery site and he was happy to represent the interests of the owners of the site on that basis and at no point did

he recommend we contact any other person or business on the OTB site which his family owns. Jason Zeloof attended the 18 July meeting and was invited at that meeting to tell other people whom we had been unable to reach about our proposals, which we presume he did. It is worth noting that Ofer Zeloof is a director of Zeloof LLP **and** also a director of Truman Estates Ltd and so it would seem fairly straightforward for his co-director at Zeloof LLP (his brother) to have made him aware of his involvement with us. Mr Sassoon Raymond was made aware because he came to the AGM on 18 August and took part in the meeting and subsequently an employee of his (representing Truman Estates Limited) is a member of the Committee of the Forum; that person being Mr. Steve Paton. We think it is at least opaque, at worst deceptive, that at no point in the Truman Estates Ltd. objection document (which repetitively demands from us “the highest standards of transparency”) does it say that Truman Estates Ltd. is owned by the very same people making an objection in the name of Zeloof LLP.

Statement on Membership Procedures

Membership can be applied for online using a link on our public website. Membership and the conditions pertaining to membership are outlined in our constitution which is based on the constitution of the East Shoreditch NPF and like the constitution of that LBTH designated and approved body it qualifies business membership as being available to “business operators”. We have been advised by DCLG this is permitted in Schedule 9 of the *Localism Act (2011)* where s.61F(5)(e) referring to membership criteria includes “such other conditions as may be prescribed” and it is on that basis that neighbourhood fora such as ourselves and East Shoreditch have written constitutions which set out these ‘other conditions’. The purpose of qualifying business membership as “business operators” is so as broad a range of independent business interests are fairly and represented and a large company or corporation which happens to have an office within the bounds of the neighbourhood cannot seek to subvert the forum and command potentially hundreds or thousands of its employees to each sign up as members and vote following company instructions; were such a situation to occur any faith in the forum by the diverse communities in this neighbourhood would be lost! We consider that this clause is lawful because the relevant part of the Localism Act permits neighbourhood planning forums to apply such ‘other conditions’ like this to their membership. Our constitution also allows the management committee of the forum to object to or cancel the membership of any person whose involvement would go against the aims and objectives of the forum as stated in the preamble of our constitution.

We welcome the Planning Department’s recommendations on this and would gladly adopt any changes to our constitution which they deem sensible.

Our public meetings were made known to the business community at the OTB as well as the wider business community, as we have discussed earlier in this statement, and no restriction was made on the people Jason Zeloof brought with him to the AGM in August 2014. Those persons included Sassoon Raymond and about nine employees of Zeloof owned businesses. It is our policy that any person who lives or works in the neighbourhood area is welcome to come to and participate in our meetings. An example of this is Josephine Pletts who is a partner in Brown & Pletts (tenants at the Old Truman Brewery) and is a member of the forum representing the interests of her business. Another example is Steve Paton who represents the interests of Truman Estates Limited on behalf of its directors.

After Jason Zeloof made his objections public on 15 August 2014 we quickly received about 25 representations mainly from stall holders at the OTB as well as tenants operating from properties which are owned by Zeloof-owned companies (e.g. Truman Estates Limited / 93 Feet East Limited et cetera) using an online form to register their objection to the very basis of any possible membership of the forum on their part. The writers of these objection letters have sent facsimile objections to those made by their landlord wherein they told us how they oppose the creation of the forum and the basis of any possible membership on their part. Furthermore, we do not believe that these individuals were acting freely or were in full knowledge of what neighbourhood planning is, indeed, we had encountered several quite angry tenants at the OTB site who told us they were completely opposed to our proposals because “you want to harm our business” and “you will raise our rents and change our opening hours”. Clearly someone was spreading false and inflammatory information among the OTB business community because, as you know, raising rents and changing opening ours are not things that a neighbourhood forum can do and it is not something that any person associated with proposals to establish a forum has ever proposed should happen. We are not anti-business – we are adamantly pro-business. We did ask these people where they had got this information from and were told by them that they had either received an email which had been circulated to all the businesses on site and, in one case, he had found a

printed out version of the email pushed under his office door. We found that the business community were afraid to show us this email because they feared the consequences of being seen to go against the owners of the site.

Most of the “horror stories” which we have heard about being circulated about the forum were relayed to us verbally but we can provide a written example of the extreme pressure being applied to tenants (and even prospective tenants!) at the OTB site by the organizers of “the petition”. Here is an email we received from one such person in February:

From: [REDACTED]
Sent: 26 February 2015 16:37
To: info@spitalfieldsforum.org.uk
Subject: Form Submission - Contact

Your name: [REDACTED]

Email Address: [REDACTED]

Message: Hi there. I'm about to sign a lease in the area where it has this neighbourhood planning petition. Actually the landlord asked me if I could sign it but I still don't get what this planning is all about. There's a proposed area but which is quite big and there's an alternative area which is much smaller and that's the one he's asking me if I could sign it. I need to know which one of those is the best benefit local business and real people working for the community and not just corporations looking for profit. The place I'm taking over has an amazing history and I'd really like to keep it that way and not being thrown away in 02 years time for someone to know it down to transform here in another office business building.

Looking forward hearing from you.

Regards
[REDACTED]

We have heard nothing from these individuals since then but would any business operators at the OTB site as members and encourage their participation in the forum.

Nevertheless, all these valued local business people working at the OTB site were certainly aware of the AGM of the Forum being held on 18 August 2014 because Mr. Zeloof tried very hard to get as many of them to come to it as possible and, in the end, around eight or nine tenants and employees of his came along and were made welcome. It is worth noting that all of these people were employed by companies owned by Mr. Jason Zeloof with the sole exceptions of Mr. Sassoon Raymond, who is a director of a company owned by the Zeloof family, and Ms. Josephine Pletts who is a partner in an architecture firm who are tenants of Mr. Zeloof and enjoy having Mr. Zeloof as their major client.

At the AGM meeting the views of Mr. Zeloof and his employees and tenants were heard exclusively for well over an hour before a vote was held to consider their proposals and objections. The outcome of the vote, which was independently monitored, was clearly in favour of the ISG's proposed boundaries and constitution and rejected the proposals made by Mr Zeloof and associates. However, at the AGM two individuals from the OTB site (Jason Zeloof and Steve Paton, an employee of Truman Estates Limited) were elected to represent the interests of that business community on the committee of the forum at its monthly meetings. Since then, over the past eight months, Mr. Paton (representing Truman Estates Limited) and Mr. Zeloof (representing Zeloof LLP) have been involved in a process of continuous consultation with the other members of the SNPF Committee and we are very pleased to say they have both made a constructive and much valued contribution to the life of the forum; we hope this can be a model for future participation and very much hope to continue working with them closely in the future on matters of interest to all the people who live in this neighbourhood.

It is worth mentioning at this stage that the Spitalfields NPF has seventeen other local and independent business operators as full members (beyond the two just mentioned) as well as around a hundred local business people who are represented in the forum by parent organisations to which they belong that hold membership of the forum and act on their behalf representing their interests; these include the Spitalfields Society and the Spitalfields Community

Group. In addition to this our cherished business membership includes an individual who officially represents the corporate owners of Old Spitalfields Market, the owners of several curry houses and restaurants, two fashion retailers, and, at the last check, around six licensees - including three local publicans and the manager of a bar which operates from the OTB site. Our membership clearly reflects the diverse range of interests locum to the OTB site and since our designation application was submitted on 1st December 2014 our membership has continued to grow, now including the Spitalfields Historic Buildings Trust and the Exchange Building Management Company as well as other individual resident memberships.

Statement on Future Consultation

Once designated the SNPF will do everything it can to ensure that the business community at the Old Truman Brewery and in the wider Spitalfields area have access to accurate and objective information about neighbourhood planning. The SNPF will endeavour to broaden the scope and range of its communications to ensure that the depth of information and its frequency is suited to the different needs and wishes of local members, be they businesses, residents, community or other organisations.

A Communication Sub-Committee of the Executive Committee of the Forum has already been formed and this will plan a continuous and reflective process of consultative implementation and ongoing monitoring for success and secure feedback.

The Communication Sub-Committee will:

1. Begin an initiative to make sure all the business operators at the Old Truman Brewery site gain access to accurate and objective information about neighbourhood planning and are given every opportunity to join the forum and take part in our meetings.
2. Develop a database of potential targets to include postal, email, web, telephone and social media addresses of members, potential members, local opinion formers and influencers etc.
3. Systemise an updating process for members and potential members
4. Create attractive and appropriate designs, formats and consistent standards for all materials so they reach out to all communities and interest groups
5. Plan a programme of activity to include: general meetings; annual general meetings; members meetings; events (such as historical talks, walks, exhibitions); awareness promotions; graphic materials (such as maps, photos); newsletters - paper and electronic; posters; subscriber postings; email lists; research (into awareness, member viewpoints etc); videos; liaison with third parties; press relations; fundraising and charity. Please see table below for a brief overview of the approach we are going to take.
6. The aim of the future consultation strategy its to create a robust and comprehensive database of members, businesses, residents, community or other organisations whereby we have easy access to these groups by different forms of communication so that when the time comes for engagement proceedings we will be able to contact everyone and hear the views of the whole neighbourhood.

Once designated, the SNPF will aim to broaden the scope and range of its communications to ensure that the depth of information and its frequency is suited to the different needs and wishes of local members, be they businesses, residents, community or other organisations. A Communication Sub-Committee of the Executive Committee of the Forum has already been formed and this will plan a continuous and reflective process of consultative implementation and ongoing monitoring for success and secure feedback.

We commend this response to your appraisal.

Sincerely,

DAVID DONOGHUE



Chairman

Interim Steering Group

THE APPENDICES WHICH FOLLOW ARE DESIGNED TO ILLUSTRATE POINTS WE HAVE RAISED VARIOUSLY IN THIS DOCUMENT

1. A screen print (underline added) of the OTB website taken 01.04.15 which says “more than 200” businesses are housed at the Brewery. This is very much different to page 4 of the letter from Zeloof LLP to LBTH (16 February) which says, “the site is now home to over 500 businesses”. This is an extraordinary 150% increase.

← → ↻ 🏠 www.trumanbrewery.com/cgi-bin/directory.pl



WHAT'S ON?

Sales Exhibitions

Events Night Life

Coming up Past

LIFESTYLE

Bars, Clubs & Restaurants

Markets Shops

SPACE AVAILABLE

Renting Space

Venue & Events Hire

Sample Sales

Exhibitions

Film and Unit Base

Photo Shoots

Events

Marketing

Fashion Shows






All Venues

Newly Joined

Search Tenants: Search

The Old Truman Brewery Business Directory

* The Old Truman Brewery has become the creative hub of London's East End. To-day more than 200 small, creative businesses are housed in the Brewery. Fashion designers, artists and DJ's work alongside graphic designers, architects, recording and photographic studios.

 <h4>Media</h4> <ul style="list-style-type: none">Branding & AdvertisingConsultancyGames ProductionManagementMusic ProductionPRPublishing	 <h4>Art & Design</h4> <ul style="list-style-type: none">Art & PhotographyDigital & New MediaInterior & ArchitectureProduct & FurnitureWeb & Print Design	 <h4>Fashion & Styling</h4> <ul style="list-style-type: none">Fashion BoutiquesFashion DesignersHair Salons	 <h4>Leisure</h4> <ul style="list-style-type: none">Bars & ClubsCafes & RestaurantsEateries & Food TrucksEventsRetailSocial NetworksTheatre & FilmTravel	 <h4>Other</h4> <ul style="list-style-type: none">ITMusic DistributionOtherRecording StudiosRecruitment & MPowerTraining
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Top of the Page

2. Directorships maintained by Jason Zeloof including Zeloof LLP, 93 Feet East and Old Truman Brewery Limited.



COMPANY OR DIRECTOR NAME

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Registered Details

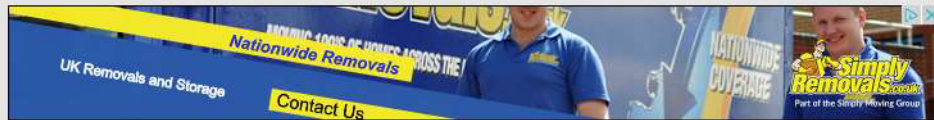
Short name Jason Zeloof
Year of Birth: 1974
Director ID: 907133740

Registered Address

91 Brick Lane
London
England
E1 6QL

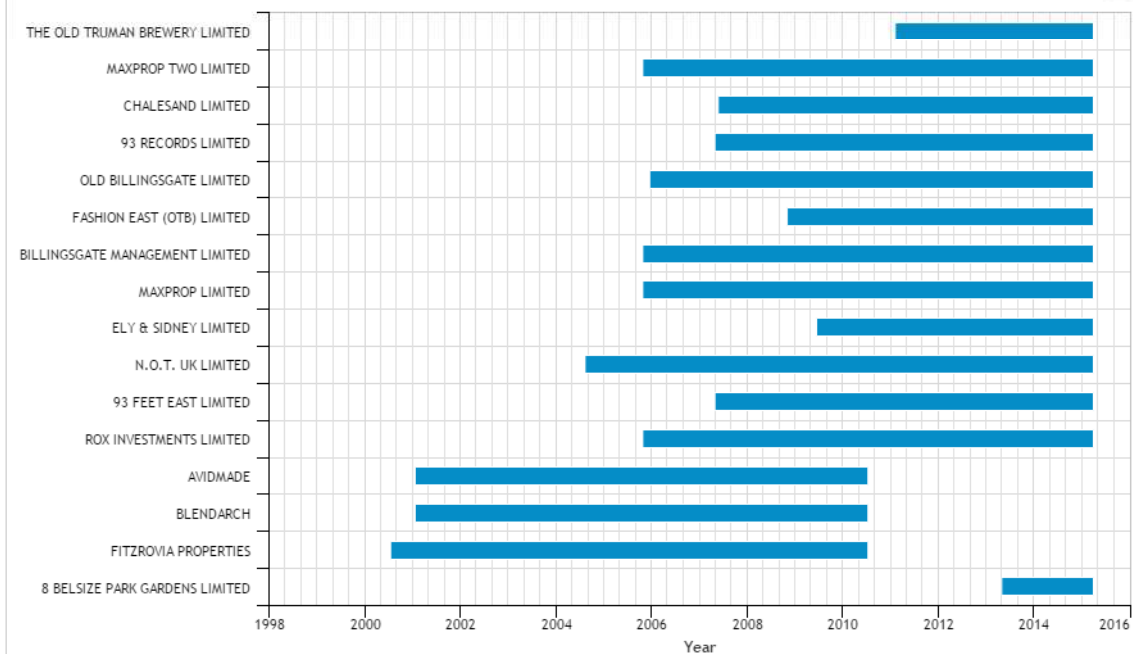
Directorships

14 appointments at 13 active companies
3 resigned appointments
0 appointments at 0 dissolved companies



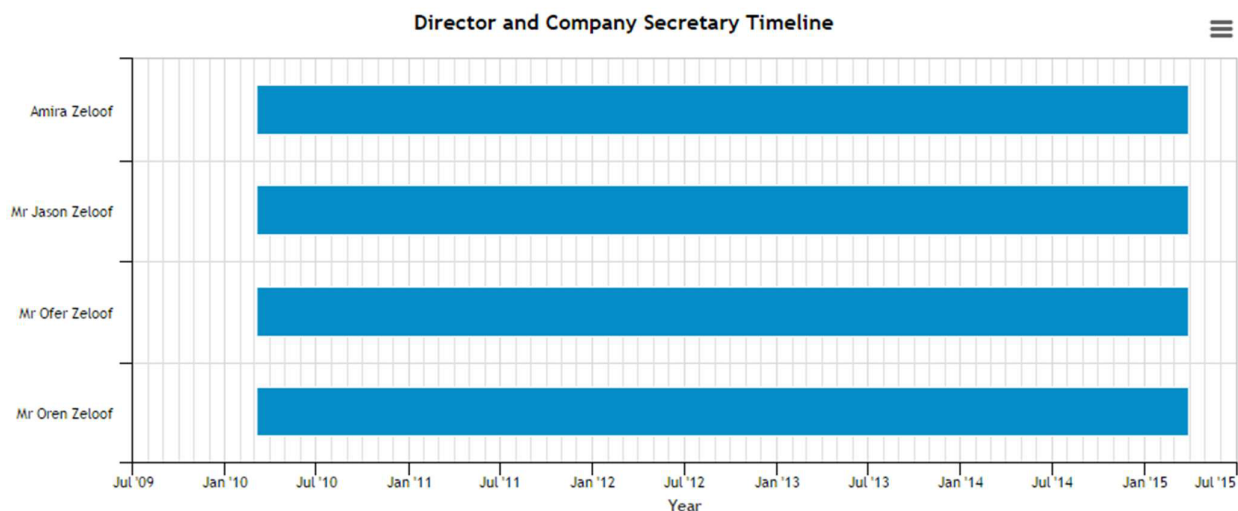
Company Summary

Director and Company Secretary Timeline



3. Ownership of **Zeloof LLP** – note that Ofer and Jason Zeloof are brothers and are both directors of Zeloof LLP. Please see point (4) and (5) for relevance.

ZELOOF LLP is run by 4 members. Member details are extracted from Annual Returns submitted to Companies House. The latest Annual Return for ZELOOF LLP was filed for the period up to 31/03/2014. Visit the Documents tab to [download the latest Annual Return](#).



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UTM




Microsoft
TMG

SOPHOS
Security made simple.

Current Members

Current Member Name	Appointed	Current/Dissolved	Resigned	Total	
Amira Zeloof	04-03-2010	1	0	1	BUY NOW
Mr Jason Zeloof	04-03-2010	1	2	3	BUY NOW
Mr Ofer Zeloof	04-03-2010	1	0	1	BUY NOW
Mr Oren Zeloof	04-03-2010	3	0	3	BUY NOW


4. Ownership of **Truman Estates Limited**. We have included this because "Item 12" in the summary document sent to you by Zeloof LLP (16 February 2015) says "**Truman Estates Limited owns those parts of the estate which are not owned by us.**" This is not strictly true because Ofer Zeloof (Jason Zeloof's brother) is a director of Zeloof LLP and he is also a director (one of just two) in Truman Estates Limited.
So this statement is factually untrue.



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Summary

Accounts

Credit Risk

Charges

Directors

Structure

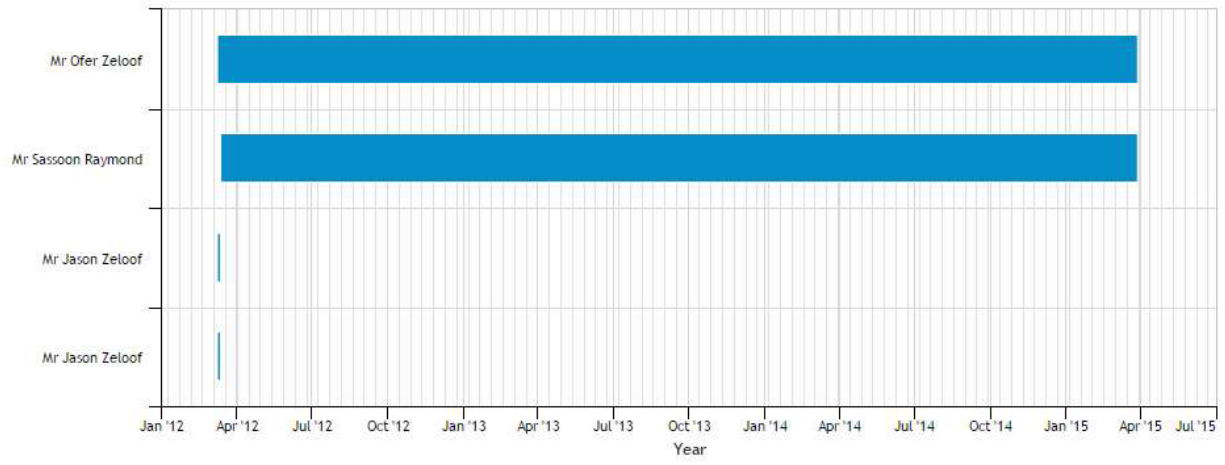
Documents

Reviews

Directors and Secretaries


TRUMAN ESTATES LIMITED is run by 2 directors. Directory and secretary details are extracted from Annual Returns submitted to Companies House. The latest Annual Return for TRUMAN ESTATES LIMITED was filed for the period up to 31/03/2014. Visit the Documents tab to [download the latest Annual Return](#).

Director and Company Secretary Timeline




Officer Name	Start Date	End Date	Role
Mr Ofer Zeloof	04-04-2012	04-04-2015	Director
Mr Sassoon Raymond	04-04-2012	04-04-2015	Director
Mr Jason Zeloof	04-04-2012	04-04-2013	Company Secretary
Mr Jason Zeloof	04-04-2013	04-04-2013	Company Secretary

Weekly car hire from just £13/day



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Current Directors and Secretaries

Current Officer Name	Appointed	Current/Dissolved	Resigned	Total	
Mr Ofer Zeloof	08-03-2012	1	0	1	BUY NOW
Mr Sassoon Raymond	12-03-2012	1	0	1	BUY NOW

There is no current secretary information for this company.

5. Ownership of Old Truman Brewery Limited (who are said to provide “agency services” to Truman Estates Limited) which is true but what is concealed is that all three companies are owned by the same people. Effectively, Mr. Zeloof provides agency services to himself.

COMPANYCHECK

COMPANY OR DIRECTOR NAME

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Directors and Secretaries

THE OLD TRUMAN BREWERY LIMITED is run by 1 director. Directory and secretary details are extracted from Annual Returns submitted to Companies House. The latest Annual Return for THE OLD TRUMAN BREWERY LIMITED was filed for the period up to 30/04/2014. Visit the Documents tab to [download the latest Annual Return](#).

Director and Company Secretary Timeline

Officer Name	Start Date	End Date
Mr Jason Zeloof	2005-10-21	2015-10-21
Mr Jason Zeloof	2011-10-21	2015-10-21
FETTER INCORPORATIONS LIMITED	2001-10-21	2001-10-21
FETTER SECRETARIES LIMITED	2001-10-21	2001-10-21
Mr Douglas Charles Leigh	2001-10-21	2005-10-21
Mr Douglas Charles Leigh	2002-10-21	2008-10-21
Mr Ofer Zeloof	2001-10-21	2011-10-21

Current Directors and Secretaries

Current Officer Name	Appointed	Current/Dissolved	Resigned	Total	
Mr Jason Zeloof	01-02-2011	14	3	17	BUY NOW

Current Secretary Name	Appointed	Current/Dissolved	Resigned	Total	
Mr Jason Zeloof	21-10-2005	14	3	17	BUY NOW

6. Here are two photographs of Mr. Jason Zeloof present at a Public Consultation meeting which he had been personally invited to attend that was held on 21 July 2014. After this meeting, until 15 August, we wrote to him a further five times and he wrote back to us once. At no stage did he raise any questions, concerns or objections. Since October 2014 he has met with other members of the SNPF Committee on four occasions where he has been consulted on SNPF activities and his views on a wide range of local issues have been sought.



This red area on this map depicts the Old Truman Brewery site

This is Mr. Jason Zeloof watching the area presentation. Jason spoke to several ISG members after the presentation and raised no questions or made any objections to the OTB inclusion. He even said, "I thought it was good". At the same meeting he completed an application form to join the forum.

7. A full list of current SNPF members (retrieved 11.04.2015). If a company or organisation is a member in its own right as a business or organisation entity then the name of that entity is shown in *italics* first with the designated representative named afterwards in parenthesis. Where an individual is a member in their own right as a local resident but has a relevant association with a local business or organisation entity then that entity is shown after the name in *italics* and parenthesis.

1. *Alternative London Walking Tours* (Gary Means)
2. Rodney Archer
3. Katherine Aspinall
4. *Attlee Youth & Community Centre/The Attlee Foundation* (Tania Shaikh)
5. Sara Bainbridge
6. Maria Bather (*The Commercial Tavern P.H.*)
7. Cristina Benevante-Staudacher
8. *Big Chill Bar* (Sandra Arvidsson)
9. *Blessing & Co Ltd.* (Philip Vracas) (*Parish Clerk, Christ Church Spitalfields*)
10. *Brown & Pletts LLP* (Josephine Pletts)
11. Cat Cox (*Burhan Uddin House Tenants' Association*)
12. Cdre. H. John Critchley
13. Gideon Cube-Sherman
14. Yolanda de los Bueis (*Vice-Chair, Holland Estate Management Board*)
15. Donna DeWick
16. *Digital Business Initiative Ltd.* (Ben Stephenson)
17. David Donoghue
18. Chris Dyson
19. Tim Elliott
20. Sandra Esqulant (*The Golden Heart P.H.*)
21. Olwen Evans
22. *Exchange Building Management Company* (Robert Wood)
23. James Frankcom (*LBTH Community Champion Coordinator: Spitalfields & Banglatown*)
24. Jeremy Freedman
25. *Friends of Mallon Gardens* (Mike Nicholas)
26. Charles Gledhill
27. Alex Gordon-Shute
28. James Hurlin
29. Iqbal Hussain
30. *Johnston Architecture & Design* (Paul Johnston)
31. Martin Lane
32. Chris Legg
33. *Lewis & Leigh P.R.* (Koral Webb)
34. *London Lifestyle Lounge* (Jarelle Francis)
35. Tim Lowe
36. Conor McLernon
37. Nicholas Morse (*Chairman, The Spitalfields Society*)

38. Junior Mtonga (*LBTH Community Champion Coordinator: Spitalfields & Banglatown*)
39. Cllr. M. Abdul Mukit MBE (*Ward Councillor*)
40. Michael Myers (*Spitalfields Market Residents' Association*)
41. Brian Noone
42. *Old Spitalfields Market - Ashkenazy/Tribeca Holdings* (Andrew Turf)
43. Gill Orbell
44. Heloise Palin
45. *Truman Estates Ltd* (Steve Paton)
46. James Peagram
47. Dr. Yoann Personne
48. Siân Phillips CBE
49. Cllr. John Pierce (*Ward Councillor*)
50. *Precious London* (Kate Evans)
51. *Preem & Prithi* (Azmal Mert Hussain) (*Chairman, Brick Lane Restaurateurs Association*)
52. Lindy Pyrah
53. Luisa Robbez-Masson
54. Jarrod Sanderson
55. Ann Shapiro
56. Jon Shapiro (*Chairman, Spitalfields Regeneration*)
57. Emma Shavick
58. Santokh Singh-Kaulder
59. Matthew Smith (*Chairman, Bethnal Green & Bow Conservative Association*)
60. *Social Organisation for Unity & Leisure / SOUL FC* (Tarik Ahmed Khan) (*Secretary, Tower Hamlets Labour Party*)
61. *Spitalfields City Farm* (Mhairi Weir)
62. *Spitalfields Community Group* (Matthew Piper, Chairman)
63. *Spitalfields Historic Buildings Trust* (Tim Whittaker, Director)
64. *Spitalfields Housing Association Ltd.* (Murselin Islam)
65. *StickyWings Restaurant* (Darul Rahman)
66. *The Duke of Wellington P.H.* (Tim Barrett)
67. *The Society for the Preservation of Ancient Buildings* (Sara Crofts, Deputy Director)
68. *The Spitalfields Society* (Fay Cattini)
69. Anne-Marie Tong
70. *Toynbee Hall* (Karen Hart, Estate Regeneration Project Manager)
71. John Twomey
72. Christine Whaite (*Chairman, Friends of Christ Church*)
73. Alan Williams
74. Lyn Williams
75. *Zeloof LLP* (Jason Zeloof)