

CONSULTATION AND ENGAGEMENT

TWICKENHAM RIVERSIDE TRUST

1. The Authority's Statement of Case, in its Section 3, addresses Consultation and Engagement.
2. Para 3.2 refers to the "extensive historic consultation" that has taken place since 2010.
3. There has been, of course, historic consultation regarding plans for Twickenham riverside that predate 2010. The Twickenham Riverside Trust was founded in 2011 directly as a result of one such 'consultation' that formed part of an extensive campaign in opposition to a 2009 proposal for a large-scale development on Twickenham's Riverside. There had also been prior proposals for developing the 'pool' site, dating back to 1990. All had met with considerable local opposition.
4. See attachment *History of the Pool Site (to include Santander site from 2013)* for a timeline of the history of the site (from the closure of the Pool in 1981 to the engagement of RIBA Competitions in January 2019).
5. The above document also contains visuals of the various schemes that have been proposed over the years, to include the 2009 scheme mentioned above.
6. As mentioned above, the Trust came into being in 2011 on the back of a cross-party, multi-group protest against the 2009 plans for development on the pool site. The founder members of the Trust were representatives of various protest groups who had coalesced under shared goals.
7. See below for the 'mandate' the coalition of campaigning groups (from which the Trust was formed) sought from the public to represent its aspirations for the public land.
8. Petition wording presented to Downing Street October 9th 2009 with 8,650 signatures:

1. “We call on Richmond Council to honour the recommendations of the Government appointed Inspector asked to investigate the use of the Twickenham Swimming Pool site. These included:
 1. The provision of public open space as the predominant feature of any redevelopment scheme,
 2. The provision of public toilets,
 3. That the public open space should be immutable and that any development should have regard to the conservation nature of the area.

4. Results of Referendum conducted by the Electoral Reform Services 25th June 2009:

Question: "Should public land on Twickenham Riverside be sold to a property development company?"

Eligible voters: 4090

Total number of votes cast: 1928

Turnout 47.1%

Invalid votes 18

Number to be counted 1910

Yes: 125 (6.5%)

No: 1785 (93.5%)

5. There was a change of Administration in 2010, and in 2014 the new Administration vested a demise within the newly created (June 2012) Diamond Jubilee Gardens in the Twickenham Riverside Trust, which had been established in 2011.
6. The Trust carried out its own survey in May 2017. Several volunteers carried out a survey over a period five days (Fri-Tues) at various time between 9am-5pm of current users of the Gardens. Volunteers were asking users to complete the survey over a period of 22 hours across the five days.
7. See attachment “Diamond Jubilee Gardens - what visitors are saying May 2017” for the 17-page report of the responses.

1. See attachment “TRT DJG user survey May 2017 (summary)” for a two-page summary, highlighting key themes.
2. (It was as a result of the above survey that the grassed areas of the Gardens were replaced with artificial grass.)
3. The above survey was used in part to inform the Trust’s December 2018 ‘Principles for Development’ it submitted to the Authority for inclusion in the RIBA Design Brief.
4. See attachment “Principles for RIBA Design Brief”.
5. Paras 3.5-3.7 address the consultation that took place in September 2019 as part of the RIBA Design Competition.
6. All of the consultation (creation of consultation materials, analysis of results, writing of reports) on the Authority’s Scheme has been carried out in-house. This is in contrast to the previous Administration’s 2017-18 scheme, for example, where all the consultation analysis was outsourced.

7. JANUARY 2021 CONSULTATION

8. The launch of the January 2021 coincided almost to the day with the launch of the 3rd COVID Lockdown in England. It was therefore an online-only consultation. Whilst the Authority held two online ‘consultation’ presentations, the opportunity to view material and interact with officers was inevitably compromised, for certain sectors of the population more than others.
9. Alongside this, the Trust also raised concerns in a March 2021 email to the Authority about consultation material not only being analysed in-house, but also authored in-house.
10. Email response from Anna Sadler 17 March 2021:
11. *There should be no concern that the consultation results were analysed by the Council’s Consultation Team. The team are responsible for almost all reporting on Council consultations*

and are fully qualified, independently accredited and members of the relevant professional bodies.

1. The Trust had requested sight (prior to its launch in January 2021) of questions regarding Open Space that the Authority would be putting to the public. The Authority agreed but the Trust still had to chase in order for material to be forthcoming. See email below for the response to a chasing email from the Trust:
2. (from LBRuT Officer Anna Sadler 5 January 2021)
3. *Apologies I haven't sent it over before but **we have been receiving feedback from members** [Trust emphasis] and trying to sort logistics with the changing regulations. We are finalising the questionnaire today ideally so that this can go onto the website ready for the launch on Wednesday but **we've kept it as open as we possibly can so that people can tell us what they want.** [Trust emphasis] The question is regarding the open space in its entirety with reference to the Embankment, Gardens and Water Lane. Please find below -*

Open Space

One of the objectives of the scheme is to provide high quality open space for Twickenham, including:

- *The re-provision of the Diamond Jubilee Gardens*
- *A car free riverside where pedestrians are given priority*
- *Widened Water Lane*

8. Please tell us which, if any, aspects of the proposed open space you particularly LIKE:

.....

9. Please tell us which, if any, aspects of the proposed open space you particularly DISLIKE:

.....

10. Please give details on any other features you would like to see included in the open

space:

.....

Comments welcome,

Thanks

Anna Sadler

Programme Manager (Special Projects)

07850 513568

- I. When the Consultation was launched a couple of days later, the above question (on which the Trust had had no comment) had been altered significantly:

Open space

One of the objectives of the scheme is to provide high quality open space for Twickenham, including:

- The re-provision of the Diamond Jubilee Gardens
- A car-free riverside (Embankment) where pedestrians are given priority
- A widened Water Lane
- Enhanced space for special events

8. Do you agree or disagree this scheme achieves that ambition?

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Don't know

2. A 'closed' question (Do you agree?) had now been introduced as a prefix to the previously exclusively 'open' questions.

1. Most significantly, the powerful 'nudge' of a "car-free riverside" (already present in the original question) was now one of the four elements that informed a response to well the "ambition" has been achieved that can only be responded to by a single response.
2. It is also worth noting that a car-free riverside and a widened Water Lane (two of the above manifestations of the Scheme's "high-quality open space") are deliverable entirely independent of the 5-storey Wharf Lane Building being constructed on the Lost Open Space within the Diamond Jubilee Gardens.
3. To continue with 'nudges'/prompts, the in-house analysis of the open-ended 'tell us what you like' question that immediately followed the above 4-parter strongly reflects the effect of the 'nudge' - with most comments reflecting the areas already highlighted by the 'nudge', with a car-free riverside coming top, evidencing even more clearly the influence of the car-free 'nudge' in producing the statistics relating to the 4-part closed question.
4. The 'closed' question regarding Open Space (one of the very few 'closed' questions in the Consultation) has been relentlessly mined by the Authority in reporting support for its Scheme. Percentages that relate to a response to this 4-part proposition are reported as being in relation to just a single aspect (the reprovision of Diamond Jubilee Gardens, for example) or to use one aspect to 'underpin' a support for "high quality open space" as a whole, ignoring that one has been a powerful driver to the other.
5. Para 3.9 in the Authority's Statement of Case is a prime example of this:
6. "73% of the consultation respondents agreed that the Hopkins design achieves the ambition of high quality open space and pedestrianised priority on the river frontage"
7. Whether a mistake by an inexperienced member of an in-house team, or an purposeful change to intentionally introduce a powerful 'nudge' of a car-free riverside (except, of course, it's not "car-free" per se, but that's another matter) into a 'closed question', the end result is 'market research' producing questionable/unreliable statistics.

1. The Authority's January 2021 email (reproduced above), some two days before the consultation was launched, refers to "members" i.e. councillors. The Leader of the Council in his professional life runs a market research company, and is no doubt very familiar with the drawing up of research material.
2. Perhaps the Authority, with reference to para 3.1 of its Statement of Case which references "ensuring residents have a real say" is willing to share the internal correspondence between members and the Project Team surrounding the last-minute changes to the Open Space of the January 2021 Consultation on its Scheme?

3. RIBA COMPETITION CONSULTATION (Sept 2019)

4. There had been a previous consultation that involved a response to the Hopkins competition concept scheme. See paras 3.5-3.7 of the Authority's Statement of Case.
5. As per the January 2021 Consultation, the consultation results were analysed by the Council's Consultation Team.
6. Para 3.7 refers to the consultation with children and young people.
7. The Trust has had sight of the original "Engagement Report - Children and Young People".
8. See attachments:
(final - for general public) RIBA 2019 Children and Youth
(original - Design Panel ONLY) RIBA 2019 Children and Youth
9. When the report was issued to the public, very disturbingly the section reproduced below had been removed:

At the end of each session the Programme Team asked each class to take a blind vote on their preferred schemes (keeping their eyes closed). Some individuals refrained from casting a vote and therefore the total number of votes cast is 239, the results are as follows;

- Architect 1: 49 20%.
- Architect 2: 19 8%.
- Architect 3: 159 67%.
- Architect 4: 0
- Architect 5: 12 5%.

Most children and young people were drawn to scheme 3 as they saw it to have the most engaging activities, including a swimming pool, whilst scheme 4 was the least popular and many children felt it was not green enough and/or lacked activities for children.'

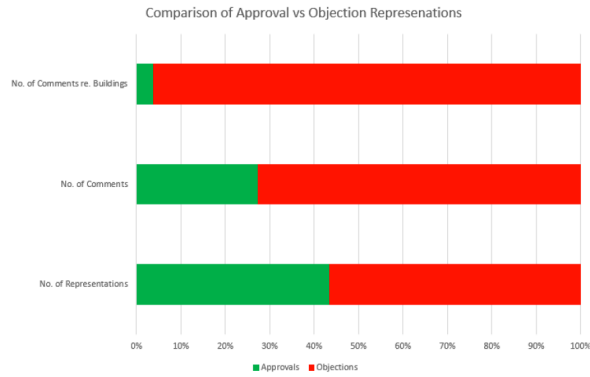
1. Architect 1 is Hopkins, with 20% of the votes.
2. It is worth at this point returning briefly to para 3.1 of the Authority's Statement of Case: "The Council's Corporate Plan puts an emphasis on creating a borough for everyone and ensuring residents have a real say over issues that affect them." [Trust emphasis]
3. The Trust has repeatedly asked the Authority for information regarding the removal of this section of the original report from the published version of the report, which represents the removal of 300 children and young people's votes.
4. Ahead of an "edited" report being made public, the Original report was given to members of the RIBA Design Panel, to inform their deliberations ahead of selecting a competition winner.
5. The Chair of the RIBA Design Panel is the Leader of the Council, Cllr Gareth Roberts. He will therefore have had sight of this Original report. Perhaps he might be able to offer more detail surrounding its redaction? Or perhaps the Authority's Project Team? The Authority has repeatedly refused to answer questions from the Trust about this.
6. The forum of a Public Inquiry, however, is an appropriate one in which to explore this matter, as the results of both the 2019 and the 2021 Consultations are evidenced as showing public support for the Authority's Scheme.

7. **PLANNING APPLICATION (August 2021)**

1. The planning application represents the first time the public had the opportunity to comment without the filter of the Authority's in-house analysis of their responses.
2. The Trust prepared analysis of the c.600 (Support, Object, Observation) comments on the planning application (as per April 2022). Whilst we make no claims to be experts in this matter, it was genuinely entered into in the spirit of not "seeking to conclude."
3. These were incorporated into a series of bar charts, which can be found in the attached: TRT Analysis of public representations (April 2022).
4. Please see below for indicative screenshots of the bar charts:

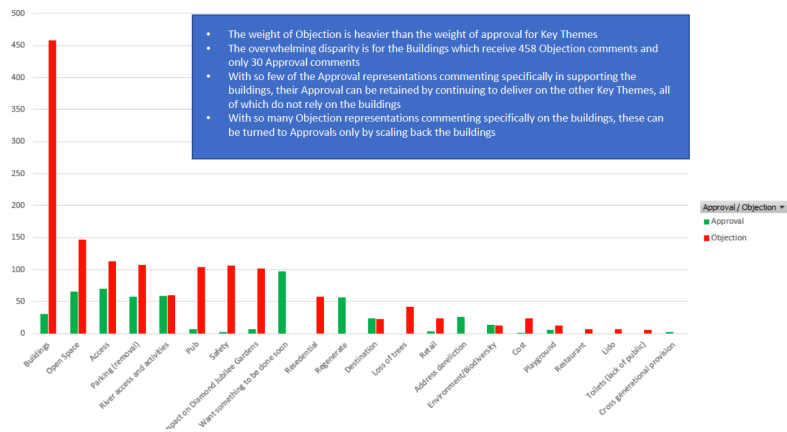
COMPARISON OF APPROVAL VS OBJECTION REPRESENTATIONS

- The number of objection representations is higher than the number of approval representations and contain far more comments
- Over 95% of comments regarding the buildings were objecting to them



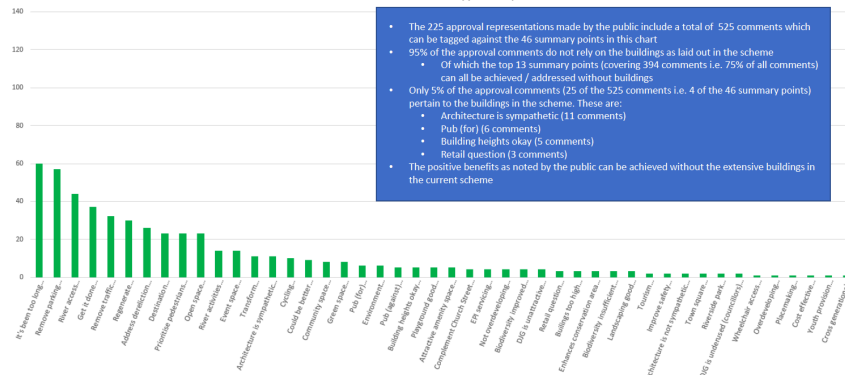
COMPARISON OF KEY THEMES

Comparison of **Approval** vs **Objection** comments for Key Themes



APPROVAL ANALYSIS

Sum of Comments across the 225 Approval Representations





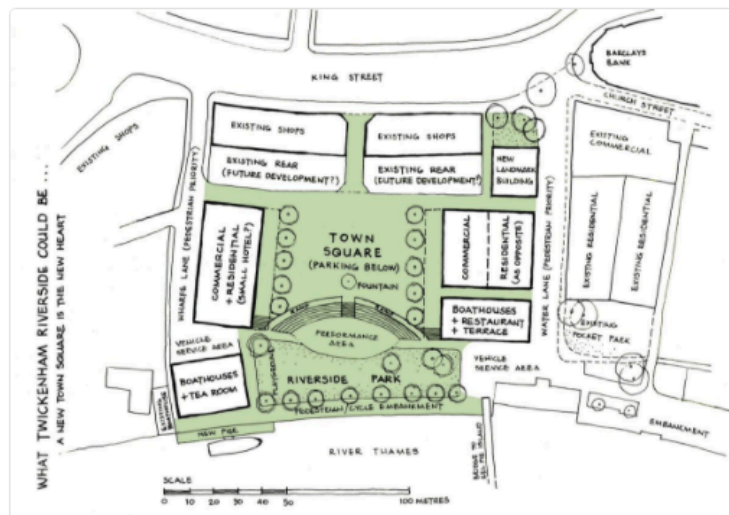
TwickenhamRiversidePark @TwRiversidePark · Sep 8

Welcome.

If, like us, you'd like cars moved off [#TwickenhamRiverside](#) please follow us.

Lots of good stuff coming soon 😊

[#ParkNotCarPark](#)



9



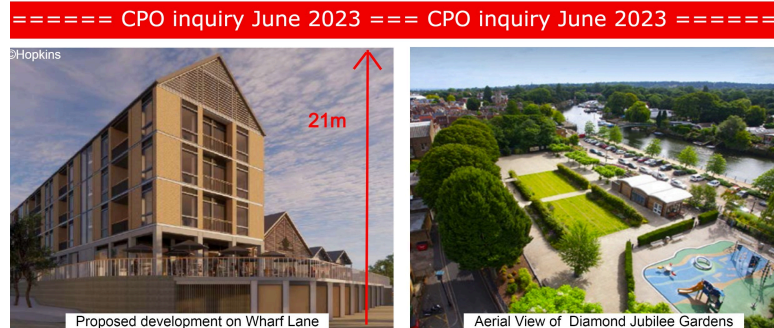
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1. The Trust, in contrast, has launched a petition specifically about the Authority's Scheme.

Save Diamond Jubilee Gardens on Twickenham Riverside **STOP THE LAND GRAB !**



- ❖ Historic open space on Twickenham Riverside to be bulldozed for luxury flats.
- ❖ Richmond Council wants to erect a 21m high-rise building on the Gardens, using more than £35mn of public money.
- ❖ A much-loved children's playground gone – and just one tree left.
- ❖ Council is aggressively using Compulsory Purchase powers to seize the Gardens.
- ❖ All derelict areas are on Council-owned land – they can be rejuvenated, other improvements made, and views of the river enhanced – without this building.

JOIN OUR PETITION

I support:

Improvements to Twickenham Riverside that will see the existing footprint of Diamond Jubilee Gardens remain free from development, the withdrawal of the Wharf Lane proposal, and the trees retained – so as to preserve and protect the Public Open Space on the Riverside for the benefit of the Public.



With thanks for your support,

www.TwickenhamRiversideTrust.org.uk



2. More details can be seen in the 'Sign our Petition' section of the Trust's website.
3. Please also see attached the Leaflet (4 pages).
4. The Trust's petition, which calls for the removal of the Wharf Lane Building from the Scheme, currently has more than 3,000 signatures of support.
5. **CONCLUSION**
6. In exactly the same way as the Authority's consultations show strong support for the removal of car parking and the Trust's analysis of the planning application comments shows strong disapproval of the Wharf Lane Building, so the ParkNotCarPark petition

shows strong support for the removal of car parking and the Trust's petition shows strong disapproval of the Wharf Lane Building.

1. **To repeat, there is a positive, constructive way forward for Twickenham Riverside. People are telling the Authority what it is, if only it was open to hearing it.**