

## CONSULTATION AND ENGAGEMENT

### TRT – EXECUTIVE SUMMARY

The Authority addresses Consultation and Engagement in Section 3 of its Statement of Case including reference to the “extensive historic consultation” since 2010.

There has been, of course, historic consultation regarding plans for Twickenham riverside that predate 2010. 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.

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) provides further details (including visuals).

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.

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.

Petition wording presented to Downing Street October 9th 2009 with 8,650 signatures:

“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.

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?"

Yes: 125 (6.5%)

No: 1785 (93.5%)

There was a change of Administration in 2010, and in 2014 the new Administration demised the newly created Diamond Jubilee Gardens to TRT.

TRT carried out its own survey over a period five days in May 2017. The survey (and a summary of its key findings) has been supplied.

This helped inform the Trust's December 2018 'Principles for Development' submitted to the Authority for inclusion in the RIBA Design Brief.

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 where all consultation analysis was outsourced.

## **JANUARY 2021 CONSULTATION**

The January 2021 consultation coincided with the 3rd COVID Lockdown. 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.

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 ADDITIONAL COMMENT: We are not criticising the Authority for the online nature of their consultation but rather pointing out that the lockdown scenario they had to operate under will have inevitably impacted the ability of certain sectors of the community to more fully engage.

Compare this for example with the public consultation on the previous 2017 scheme which was run over a 58 day period (including pop up shops, workshops and fuller non digital consultation ) plus a 32 day winter consultation.

But back to this scheme's consultation, the 2 online meetings can be viewed on the Council's website; (Twickenham Riverside Development, Design Competition, Jan to Feb 2021 consultation). The recordings of these 6th Jan and 23rd Feb meetings show local people come in with real issues. However, we cannot find anywhere that indicates how these real issues were captured and fed into adjustments to the design. It's all very well having a consultation, even one that is online only but the value lies in listening, in capturing the insights, turning them into requirements and assessing against the design, adjusting accordingly as appropriate.

We cannot find a single change to the scheme in response to any of the consultation. So in the absence of this, we examined the timings of the consultation itself. It closed on 3rd Feb 2021. The in house team then went on to analyse the results with headline results on 5th March and report released on 17<sup>th</sup> March. So, the report was produced just 5 weeks before the AA gave us their red line plan on 21st April 2021 (ref LBR5 App 59) showing the DJG reprovision. This was it, the final scheme drawings that went to planning and are the subject of this Inquiry.

Just 5 weeks. Now I may not be an architect, but have a lot of experience delivering large scale, complex, global technology projects, I have a pretty good understanding of the effort and time it takes to understand genuine feedback, to translate to requirements, to run impact assessments against existing design features, to work out how the design might be changed, to run a cost impact analysis, to review all of that with various stakeholders, to run proposed changes through approval gates and governance to get sign off or rejection and then to effect the actual changes to design. To have achieved all this in just 5 weeks is a truly phenomenal performance.

So, we would genuinely welcome the AA telling this inquiry what precise changes were made to the design in light of any of the concerns raised during the consultation process.

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The Trust also raised concerns in March 2021 about consultation material not only being analysed in-house, but also authored in-house.

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. After being chased the Authority's representative responded:

*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*

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

.....

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

.....

*Please give details on any other features you would like to see included in the open space:*

.....

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

A 'closed' question had now been introduced as a prefix to the previously exclusively 'open' questions.

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 whether the "ambition" has been achieved that can only be responded to by a single response.

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 Wharf Lane Building on the Lost Open Space.

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 reprovion 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.

Para 3.9 in the Authority's Statement is a prime example of this:

*"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"*

Whether a mistake by an inexperienced member of an in-house team, or a 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.

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 ADDITIONAL COMMENT: We note in the AAs rebuttal that they claim the exact wording the Trust had seen and had no comments on was used in the final questionnaire. This is not true as shown in our evidence where we see the question that was added beneath the list of ambitions "Do you agree or disagree this scheme achieves that ambition?" This was additional text, so the rebuttal is wrong. Also the ambition "Enhanced space for special events" had been added. Additional text, so again the rebuttal is wrong.

We didn't comment on the original wording as we agreed with it and we agreed with the officer's reason for keeping the questions open.

As for claiming the structure of the question is effectively a nudge, we maintain that by collating the 4 ambitions together and then asking a single agree / disagree question as to whether the scheme achieves the ambition conflates the ambitions together allowing one to influence the overall response. And it is clear that the ambition to remove car free riverside ambition is the most influential of the 4 (even though of course the scheme no longer actually delivers this).

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## RIBA COMPETITION CONSULTATION (September 2019)

As per the January 2021 Consultation, the earlier RIBA Competition Consultation results were analysed by the Council's Consultation Team.

Para 3.7 refers to the consultation with children and young people.

The Trust has had sight of the original "Engagement Report - Children and Young People". See attachments:

(final - for general public) RIBA 2019 Children and Youth

(original - Design Panel ONLY) RIBA 2019 Children and Youth

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.'

Architect 1 is Hopkins, with 20% of the votes.

It is worth at this point returning briefly to para 3.1 of the Authority's Statement: "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]

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 young people's votes.

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.

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 ADDITIONAL COMMENT: In the AA's rebuttal to this point they essentially claim that while the question about which scheme these 300 children preferred along with their reasons for choosing it was important and relevant for the Design Panel to see, the Authority believe it was not important or relevant for the public to see, hence its removal from the report when made publicly available. It remains the Trusts position that this insight into why children were drawn to Scheme 3 is very relevant to the public. Just as relevant as other consultation insights. We see no good reason to hide the fact that children chose scheme 3 because "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". While it is good that the Design Panel got to see this (as we stated in our evidence), it is not reassuring that this was redacted from the public report.

Also relevant here is a letter I received on Friday from a young man, a schoolboy who plays football with his pals almost every day in the Diamond Jubilee Gardens. I realise this has come in at the last minute but it's really very short and wonderfully written and I think it would be of great use for this inquiry to hear directly from our local youth, if Mr Tait is okay with that.

Dear [Council Members' Names],

I hope this email finds you well. I am writing to you as a concerned member of the community to express our collective plea to preserve the park located in our neighborhood and oppose the construction of luxury flats on its grounds. This park holds immense value for our community, and I urge you to consider the invaluable benefits it provides to the local residents, particularly us young boys and girls who rely on it daily.

One of the most significant reasons for preserving this park is the extensive use it receives from boys attending the surrounding schools. Every single day, these boys, including myself, gather on these grounds to play football , rugby , or any other games we can think of at the time .The park has become an integral part of our lives, where we can bond, compete, and develop essential skills such as teamwork, discipline, and physical fitness.

The park's wide open spaces and greenery offer a unique environment for recreational activities that cannot be replicated by any other setting , it is a mere 6 minute walk from the school grounds , a perfect distance away to get to and from school in between break times. It serves as a safe haven, a place where we can escape the stress of school, and truly embrace the joy of sports. We spend countless hours on these grounds, honing our skills and simply having fun.

By considering the construction of luxury flats, we risk losing this invaluable space, which not only serves as a playing field but also fosters a sense of community. The loss of the park would have a detrimental impact on our lives, as it would leave us without a designated area to engage in physical activities and socialize constructively.



Moreover, the park plays a significant role in promoting a healthy and active lifestyle among the youngsters of our community. It offers a free, accessible, and inclusive space for physical exercise, a critical aspect in combating the rising concerns of sedentary lifestyles and childhood obesity. By prioritizing the preservation of this park, you are actively investing in the health and well-being of the future generation. It also important to mention the frequent visits of private trainers bringing their clients to the park to also engage in a range of exercises .

Additionally, the park has been a gathering spot for families, children, and residents of all ages for many years. It serves as a tranquil getaway amid the bustling high street , allowing individuals to connect with nature, relax, and rejuvenate. The lush green surroundings and fresh air have a positive impact on the mental and emotional well-being of the entire community.

In conclusion, I implore you to reconsider any plans to develop luxury flats on the park grounds and instead prioritize the preservation of this cherished space. Its significance to the community cannot be understated, especially for the boys who rely on it daily to engage in healthy activities and build lasting relationships. Let us work together to ensure the well-being and happiness of our community by safeguarding this valuable resource.

Thank you for your time and consideration. We trust that you will make a decision that aligns with the best interests of the community and the generations to come.

Sincerely,

<Name provided> and the majority of the y12 boys attending st Richard Reynolds catholic college .

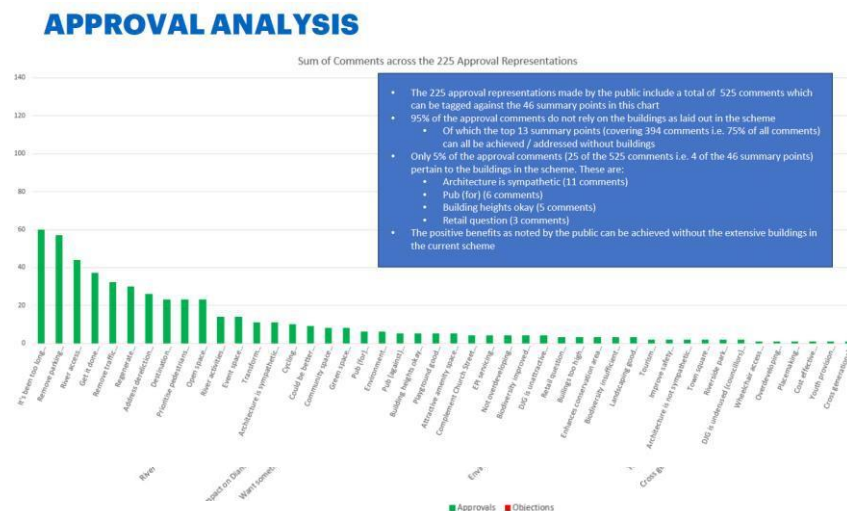
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## PLANNING APPLICATION (August 2021)

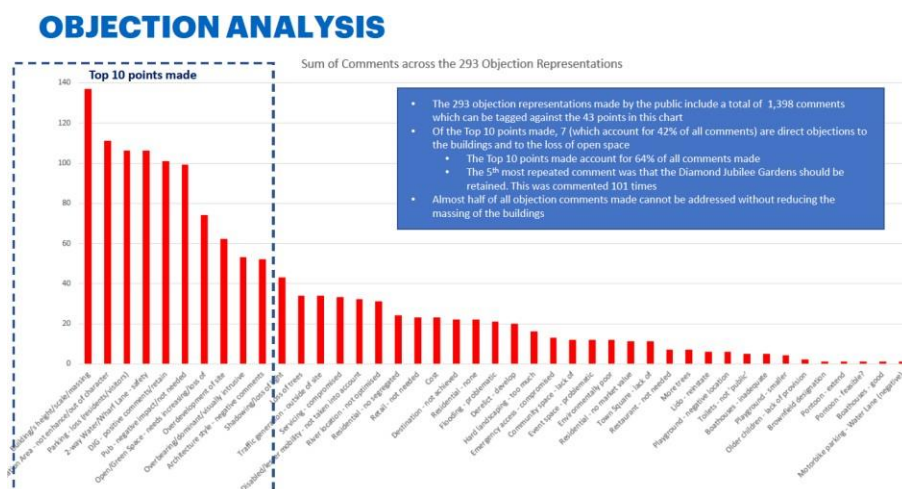
The planning application represents the first time the public had the opportunity to comment without the filter of the Authority's in-house analysis of their responses.

The Trust prepared analysis of the c.600 (Support, Object, Observation) comments on the planning application (as per April 2022).

These were incorporated into a series of bar charts (supplied)



See above and below for indicative screenshots of the bar charts:



The above analysis clearly indicates the path for an 'elegant detour' (remove the cars, remove the Wharf Lane Building) that would receive pretty much universal public approval AND realise the ambitions of the widely supported RIBA Competitions Design Brief.

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 ADDITIONAL COMMENTS: Display W4.2.09 TRT Analysis of public representations (April 2022).pdf

We note that we are not qualified in consultations as the AA's rebuttal repeats. However, we do have sufficient professional experience to understand the comments and the statistical results. We entered into the analysis without seeking to conclude and the results are so overwhelming to make any perceived lack of professional qualification irrelevant. There is more than enough headroom in the results to allow for any errors. 95% of all objection comments relate to the buildings (that was 458 objection comments on the buildings). Meanwhile just 5% (25 comments out of 525) of approval comments relate to the buildings. One does not need a certificate in consultation analysis to recognise this is a clear message from the public that it supports open space more than buildings.

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## **PETITIONS**

The Authority's Statement of Case refers to a public petition in support of its Scheme.

This was a 2017-18 petition in support of "ParkNotCarPark."

The Petition Scheme had underground parking for 150 cars, and showed a swimming pool constructed on the Embankment. It was unfeasible but nevertheless clearly demonstrated the public's desire to see car parking removed and a park put in its place.



0 10 20 30 40 50 100 METRES



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## #ParkNotCarPark



What do you want to see on  
Twickenham Riverside?  
A park or a car park?

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

## 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](http://www.TwickenhamRiversideTrust.org.uk)



### Scheme

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.

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.

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**ADDITIONAL COMMENTS:** In the AA's rebuttal (ref 2.8.6) notes that section 3 of the



Statement of Case sets out the results of the consultation and engagement period I Jan/ Feb 2021 regarding the scheme, noting that “820 responses were received and 84% of respondents said they would be more likely, or just as likely to visit the riverside after development”. We remain unconvinced with this point and think one would struggle to find a riverside resident who would be less likely to visit the riverside regardless of what their public open space was taken to enable. So, we need to explore further to find true meaning or value in the statistic.

But for the sake of argument, let's take this statistic in the way that the AA uses it. 84% of respondents say they are more likely or just as likely to visit the riverside after development. That was 689 people out of the 197,000 population of the London Borough of Richmond. So, 0.35% of residents in the Borough responded to the 28 day consultation period saying that they were more likely to visit the riverside scheme. By contrast 2,500 people – 3 and a half times as many - signed the Trust petition in less than half the time (2 weeks) objecting to it. Where's the public support? This is an important question this inquiry should examine. The AA claims that this scheme has the overwhelming backing of the public. Yet a very simple analysis using numbers already submitted to evidence indicates 3.5 times as many people objecting to the scheme. So where is the evidence for this overwhelming support?

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