

ST. CHRISTOPHER'S DEVELOPMENT (Appn. 22/01221/F)

WPCA REPORT OF ENGAGEMENT: EXECUTIVE SUMMARY

1. INTRODUCTION

1.1 As in Bristol City Council's Statement of Community Involvement, applicants on major projects are required to submit, with their application, a Community Involvement Statement. If representative groups in the area affected by an application are dissatisfied with the involvement undertaken and how this is summarised in the applicant's Statement: "*Participants may provide a written statement of omissions and corrections*".

1.2 The Westbury Park Community Association (WPCA) and – as we have been told – many in the local community were totally dissatisfied with the applicant's engagement work, so we have submitted our own detailed report to the City Council. This is the **Executive Summary** of that full report.

1.3 Representatives of the applicants made contact with the WPCA soon after their purchase of the site, asking to meet. At that meeting they introduced staff from MPC - their PR Consultants. They wished to explain the project and their commitment to undertaking community engagement/consultation and discuss how best to do that. That wish to meet was greatly appreciated and the WPCA were reassured at that meeting not just that they had chosen to engage early but also by their initial proposals for the engagement events, activities and means of communication; all of which sounded highly promising.

1.4 The engagement started with one-to-one meetings with immediate site neighbours, followed by an open invitation for local people to visit what is, in the main, a hidden (even for Westbury Park people) and very large site. Two invited workshops were held, by which time a project website had been set up. After further design work, the applicants then held two public exhibitions at which people could see the now amended site plans and ask questions of project team members. The final stage was two online webinars showing more detail of the emerging and slightly amended plans. All through this, various forms of feedback methods were used to get consultee comments and ideas. This overall pattern of activities was all to be supported and is described in the main part of the applicant's own Statement.

1.5 As elaborated in the full report, all of the detailed delivery of the various activities was very badly managed. Amongst other failings, it included two **totally disastrous workshops** and **the worst example of deliberately misleading information that this report's author has ever witnessed** (see final section).

2. ADDRESSING THE CITY COUNCIL'S 'GROUND RULES'

2.1 In relation to the 10 'Ground Rules' of community involvement in the City Council's own Statement of Community Involvement, the following were addressed reasonably successfully:

- **1. Inclusive Invitation:** In general terms this was well managed.
- **2. Authorisation:** We in WPCA confirmed the basis on which we were speaking on behalf of members.

- **3. Continuity:** In general terms this was well managed.
- **5. Early Involvement:** This was done.

(Ground Rule 7 is not applicable.)

2.2 There are, however, some very significant questions about conformity with the other Ground Rules:

- **4. Independent Advice:** The consultants appointed by the applicants (MPC) did not, at any time, act with the required "*client duty of care to all parties equally*". The MPC website states that their role is to "*motivate interest and support for our clients' plans*". This means they were clearly appointed to do all possible to secure planning permission for the applicants, not to listen to the views of the community, as was illustrated in their highly biased feedback forms (see quotations below). While seeking suggestions and ideas on a regular basis from WPCA, MPC largely ignored these and continued with clear misinformation despite many requests to amend this.
- **6. Presenting Options:** No options were ever presented and the information provided about the plans at two key stages was so minimal and inadequate that it was almost impossible for anybody, especially any lay person, to comment properly.
- **8. Consensus:** There were no opportunities for the community as a whole to engage in a way that might reach consensus and "*the reasons and the scale of disagreement*" were never made "*clear and specific*". The supposed group discussions at the September 2021 workshops were so badly managed and recorded as to be useless.
- **9. Transparent Records:** No reports were ever prepared or circulated by MPC back to contributors or the WPCA from a single event or activity until their inclusion – far too late and poorly presented across an incomprehensible 249 pages - in their own Statement. There was therefore absolutely no way in which anybody could hold the applicants to account for their approach or the final results.

2.3 Here are a few of the very many comments from local people:

- "A completely manipulative process."
- "Complete waste of 90% of our time."
- "Patronising."
- "We view the consultation exercise to date as little more than a 'tick-box'/public relations initiative and campaign. Few substantive changes have been made to the original plans as a consequence of it and the concerns expressed by the local community."
- "I've bypassed your questions as they appear framed to generate what you want to hear, not what you need to know".
- "Data presented on some of the boards was completely wrong and misleading."
- "Big cover-up from the start."
- "Questions 1 through 4 are so open to interpretation in any way by the reviewer that I cannot answer them."
- "This questionnaire is fundamentally biased such that statements are hard to disagree with."
- "Questionnaire is clearly designed to support the preferred outcome of the developers and does not create space to express concerns of local residents."
- "This is a questionnaire that forces people into answers that lean towards the answers you want. Don't dress it up as anything else."

- *“Carefully put together survey which I suspect will be spun in the development's favour.”*

3 CHANGES FROM CONSULTATION

3.1 Bristol's Statement of Community Involvement requires applicants to say *“how the proposal has been revised to take account of the issues raised and, where the application has not been revised, the reasons why not.”* In general, the applicants did not respond in any significant way to the many comments made by consultees, or explain why not.

3.2 The layout presented at the September 2021 workshops showed 121 apartments in several blocks ('Villas') varying in height from 6 storeys to 4 storeys, some clearly too close to immediate neighbours. No significant changes were made for the December exhibitions, other than some reorientation of the main blocks and an exchange of some 'Cottages' for one of the original blocks.

3.3 Almost no changes were made for the January webinars. It was only at a private meeting with WPCA after the webinars and just before the planning application was submitted (hence with no opportunity for anything to change) that the WPCA were shown a new layout with one storey removed from one block and some additional distance created to the cottages to the east.

3.4 In fact, although the very final layout shown at this meeting had offered a reduction in height for one block, and hence a reduction in apartment numbers for that block, other design changes brought the total number of apartments back up to 122 by increasing the footprint (and therefore visual impact); 1 more apartment than presented at the December events. Despite the many concerns raised about the vehicular access from Bayswater Avenue, about pedestrian access from The Glen and Bayswater Avenue and about parking provision, no changes were made to any of these and no explanation given for why not.

3.5 The changes as above have been almost cosmetic and no serious attempt has been made to explain why the very many other comments submitted had not been taken on board.

3.6 Please note that the WPCA tried very hard throughout the process to advise and help the applicant's engagement consultants to get the most and best possible results from their work and yet, with one exception, any advice and suggestions were completely ignored.

3.7 In summary:

The applicant's Community Involvement Statement may look strong because of the events and activities that they held, but it must be checked against the detail of what actually did and did not take place. Any engagement is only as good as its detailed delivery and, as the evaluation in the full report shows clearly, this was extremely poor, deliberately and dramatically misleading at times, even rigged. The work does not meet Bristol City Council's high standards and cannot be given any credence.

4 EXAMPLES OF BAD PRACTICE

4.1 Mention was made in 1.5 above of two examples of particularly bad practice (there are many others, if less dramatic). Basic information on these follows below.

September 2021 Workshops

(NB. One workshop was attended by two local councillors.)

4.2. The applicant's SCI describes the two workshops, but this presents a false picture of what took place, how it was received and the outcomes. The WPCA sent an evaluation of the workshops to the applicants. Some key points from that evaluation follow below:

- Suggestions made by WPCA representatives at a briefing meeting in advance of the workshops were almost all ignored.
- The venue was a disaster; people in groups could not hear each other or the facilitator during feedback sessions.
- The 'warm-up' exercise and the second exercise were very badly described and seen as a waste by all present.
- The presentation was just of one site layout, nothing more, and the layout did not show building heights as requested.
- All present agreed that they would wish to see and check the event report before it went on the website. This was agreed by the applicant's team at the time but it was not done.

4.3 While it is good that the applicant's SCI noted the unanimous vote taken at the end of workshop 2 rejecting the proposals, this hardly does justice to the strength of negative feeling at that point. In addition, the concern was not just about the proposals but also about the way all of the engagement had been managed up to that point. Any (cautious) optimism and trust that may have been built up had now been replaced with almost total distrust.

One Key Image

4.4 The image below of a converted Grace House has been used on the applicant's website, in various presentations to the community (it was the opening image at the December exhibitions), in the local free newspapers, in Bristol-wide newspapers and in articles in the professional press. Many people have imagined that this shows the proposed development. **It does not!**



4.5 This image:

- Uses a distorted, wide angle view which is incorrect in standard practice.
- Distorts the chromatically 'cold' grey colour of the building into something more chromatically 'warm'.
- Very carefully shows absolutely nothing of the new buildings – some of 6 and 5 storeys - proposed very close to and almost totally surrounding Grace House.

4.6 As a result of the use of this image, the WPCA received a large number of comments along the lines of 'what's all the fuss about tall buildings; this looks OK?'. This was a deliberate attempt to mislead people.