

Comments on the *Statement of Community Engagement* by Green Issues Communications for the application to develop the Campion House site

Prepared for Campion Concerns, 21st July 2006

We are reluctant to dignify this Statement of Community Engagement with a detailed commentary in the way we have done for some of the more substantial reports for this application. We believe that the 'consultation' organised by Green Issues Communications in November/December 2005 was such a transparent exercise in manipulation of opinion that little comment is needed. We have spoken to many of the residents who attended those events and we are confident in saying that there are very few, if any, local residents who would defend the process as a genuine consultation.

We now know that both 'workshop' sessions started off with a resident asking for background information so that residents did not discuss the issue in a void. On both occasions Try Homes representatives either could not or would not do this. In other words residents were asked to discuss what they wanted in small groups without having been told the basic planning parameters for the development. There is only one reason why anyone organising a discussion should place such a high priority on ensuring ignorance of the basic salient facts and that is because this allows maximum room for manipulating the results of such a discussion. The technique is not new but it is sad to see that this developer still thinks that it will be sufficient to convince Hounslow planners and councillors. We hope and believe that this will not be the case.

It is our view that the 'consultation' was such a transparent sham that little investigation is required to reveal this. In that case it may be unnecessary to read beyond (1) below. If, on the other hand, you are not convinced then it may be worth reading to see how, right through to the last communication on the subject, Green Issues and Try Homes continued to defend the indefensible even to the point of trying to justify their dubious statistics.

Finally, it should be added that the website on the Campion development which is maintained by Green Issues Communications has demonstrated the same lack of a genuine desire to communicate as the 'consultation' they organised. The website has remained unchanged to the time of writing (21st July) from last December. It therefore gives no idea of the changes to the original design. Moreover it provides illustrations with indecipherable legends. Informing Green Issues of this problem has had no effect.

Documents

This response consists of:

- (1) comments we produced in January on the Green Issues report on the 'consultation';
- (2) a background paper we produced on the general strategy of Green Issues Communications based on a book by its managing director Tom Curtin;
- (3) Points sent to Try Homes detailing some of the defects in the consultation statistics;
- (4) A reply to our letter from Green Issues Communications;
- (5) Our response to the Green Issues reply pointing out the spurious nature of their statistics. We never received a reply to this letter.

(1) *Green Issues* Spin the “Consultation”

Campion Concerns, January/April 2006

The *Green Issues* Consultation was an exercise in spin. Just before Christmas '05 *Green Issues* circulated a report on their “consultation” workshops and exhibition for the Campion House development. That process was not a genuine attempt to consult. It was organised to give the impression of consultation. Anyone familiar with such sham consultations should be able to read the signs all over this report.

Residents' opinions have been massaged to make the development look acceptable. The original workshops took place without explaining the background to residents. *Green Issues* refused when asked to explain what was possible and what was not in terms of planning regulations. The result was the residents were invited to waste their time discussing such things as the retention of Campion House even though this was never in question.

***Green Issues* works for the developer not for the residents.** *Green Issues* advertises itself to developers as having the know-how to get their projects through the local planning process. That is the way they make their money. Nothing wrong with that. The problem is that *Green Issues* are **also** being asked to make a fair assessment of residents' concerns. How sensible is that? Residents are concerned about the density of the development. Try Homes want to maximise the money they make. *Green Issues* cannot be expected to act as honest brokers in sorting this out. Indeed their report shows that they have not done so. No one should be surprised by that.

***Green Issues* prefers to ignore serious questions.** The managing director of *Green Issues* is Tom Curtin. He has made it perfectly clear how he thinks objections to developers' plans should be treated:

“In any project, there is a small number of key individuals who can make or break it...”

Supporting players must be identified...Opponents are (politely) ignored.”

The 83% support figure in the report is invalid. The report is in five sections (1) general comments, (2) design, (3) residential mix, (4) open spaces and facilities, (5) retention of Campion House. The respective percentages of residents' said to be “generally positive” (as determined by the 76 forms returned) is 53, 53, 43, 39, and 84. Somehow this is said to produce a result that 83% of residents are “overwhelmingly positive”. The miraculous calculations producing this result are not revealed to us. What is more the Campion House question should never have been included since the developer has no say over its retention which is not therefore a part of their development plan.

Crucial issues are mixed up with side issues. Residents' opinions on such matters as housing density and height of buildings, which have both been ignored in the proposed development, are treated on a level with points about location of wildflowers and colour of brickwork. This is a well known trick of the spin doctor. When sheep are asked by the wolf (1) do you want the grass to stay green? (2) Should the fields be irrigated? (3) Do you mind if I eat one or two of you occasionally? the return shows a “very positive” 66% favourable to the wolf's plans.

Sensitivity to the local setting is the key issue. The Draft Planning Brief for the Campion House site makes clear that the indicative density range for the site is 30 – 80 units per hectare (according to the type of housing). Much of the site area is open space for wider use and not part of the density calculations. The Draft Planning Position Statement for the site requires that the density of the development be sensitive to that of the surrounding housing (33 units per hectare for Thornbury Road, 44 units per hectare for the entire catchment area). However the calculations are done they cannot produce densities anything like those proposed by Try Homes. Try Homes appear to appreciate neither the need to discount a significant part of the site area from their calculations nor the need to be sensitive to the surrounding built environment.

Guidelines must be respected. We must let the Council know that we support its guidelines on density and respecting local character. We want those guidelines to be respected. The Council gave this area conservation status. That must be shown to mean something for housing developments.

(2) Green Issues Communications

- Not very green and not very communicative -

What is Green Issues Communications?

Green Issues Communications (GIC) is a public relations company that trades on its claimed ability to help developers get their projects through the local authority planning process. They are very straightforward about this. On their website they try to attract future clients by telling them how good they are at contacting all the “key people” and winning them over. The other side of their sales pitch is their claim that they can hold protesters in check and can isolate “vociferous minorities”.

There is, of course, nothing wrong with canvassing, properly regulated. It is also true that effective consultation must avoid domination by individuals pushing their own agenda. However, what emerges from a careful reading of the GIC materials is that their 'facilitating' all flows in one direction: helping the developer. At no point do they discuss what to do if the protesters have a point. Their whole discourse is about getting key people in the council and in the community on board so that those who disagree can be isolated. It is not surprising therefore that **their intentions and methods are manipulative and anti-democratic**, as we will try to illustrate below. (See also the page from the GIC website attached to this paper.)

What does GIC mean by a “green issue”?

This question is best answered by turning to the book *Managing Green Issues* written by the MD of GIC - Mr Tom Curtin. You could be forgiven for believing that a book with such a title would present a positive agenda for people concerned about environmental and other issues usually associated with a green agenda. Not a bit of it. This book would have been more clearly entitled *How To Deal With Protesters Who Think That Green Issues Matter On Behalf of Developers Who Don't*. **Tom Curtin's book is anti-Green**. A few quotations will suffice to illustrate the point.

But first a quotation from a slide show by Tom Curtin which can be found on various Internet sites.

“In any project, there is a small number of key individuals who can make or break it. It is actions taken by them that leads either to success or to failure. Their actions are not always rational. Supporting players must be identified...Opponents are (politely) ignored...but supporters are useless unless mobilised. On their projects which are parallel to yours.” (TC's emphasis)

Notice that “Opponents” are ignored. There is no question of finding out if they have good grounds for objecting. No, they are critics and therefore must be sidelined.

The conclusion to chapter 1 of *Managing Green Issues* gives a little foretaste of what is to come.

“This book deals with how companies can successfully manage controversial projects that have an impact on the environment. If they are managed well, the organisation will enjoy spin-off benefits of a strong corporate reputation, which has important and positive implication for the brand image.

Of course, this “corporate reputation” might be strengthened by doing the decent thing and facing up to the companies responsibilities. This is not what we find however.

On CO2 emissions and the third world:

“...global warming - if it exists – is a problem for tomorrow...”

On people who take recycling seriously for their own waste:

“...the environmental benefits of recycling may be negated by the car journey (to the bottle bank – DP). It all depends on how much you drink and how far you travel. In many cases, you would have been better off staying at home and putting the bottles in the bin for the local landfill tip. And there is no world-shortage of sand.”

It is always the same in this book. Nothing here is strictly false it is just systematically one-sided. All of the book's discussions of green issues are in the same sense: always negative.

Thus, all we are told about wind farms as a source of sustainable energy production is

“Wind farms are unsightly and make a terrible noise, and produce only miniscule amounts of energy.”

What we find therefore is that the interest in green issues is a rather negative one but what is much more significant for the role of GIC is the approach recommended to getting large-scale projects through to completion even when there are doubts about their environmental impact. Confusion between reality and what is said about that reality is a PR person's occupational hazard. Thus we read:

“Knowledge is our perception of what the facts are. In reality, in dealing with environmental and similar issues, there is no reality – there are just perceptions. These perceptions are what people believe ...”

This is the ad man's dream world: reality is whatever we make it out to be. It's not reality that needs to be changed just people's perceptions – and that is so much cheaper. However, if you have an over-dense housing development on your doorstep then the reality of its negative effects on the neighbourhood will make itself felt whatever your initial perceptions.

Chapter 14 of *Managing Green Issues* is devoted to *Managing Public Meetings*. Tom Curtin explains that all public meetings are undesirable in themselves but admits that sometimes they are unavoidable. He discusses the different types of meeting and the ways in which companies can avoid being put on the spot by those who want to question them. He recommends exhibitions as the public meeting of choice because

“... there is no platform, so there is no focal point. In other words, there is no stock in which the organisation sticks its head for people to throw rotten fruit at it.”

At no point in this chapter, or anywhere in the book, do we find a discussion of what might be effective ways of getting critics of a scheme to make their points in an informed way so that if they have a good case it can then be taken on board. The whole thrust is manipulative and exactly coincides with our experience of the Green Issues 'consultation' over the Campion House site.

How did GIC Consult over Campion House?

GIC organised two evenings of 'workshops'. Two weeks later they held an exhibition where feedback forms were available. They also set up a website with information about the development and with an on-line feedback form.

At the workshops no background information was given to residents about the nature of the site or the planning guidelines. When asked to do this they declined. Instead they asked residents to discuss whatever they saw as important and made a number of suggestions as to possible topics. Thus people were placed in a discussion vacuum and were prompted to think in certain directions. Each table in the workshop was staffed by a Green Issues employee. These employees themselves had no knowledge of either the site or the local area. The whole thing was a farce.

Drawings of the development were produced at the exhibition which, it was claimed, had been produced to meet residents' requirements. There are few takers for this claim. In the report of the whole process based on the workshops and feedback forms from the exhibition it was claimed that 80% of those responding were generally positive about the proposals. Apart from the fact that completely spurious questions were asked about things which Try Homes has no control over in order to bump up the positive response, this conclusion cannot be reached on the basis of the figures provided. Green issues have declined to respond to questions about this. They have also declined to respond to a request to see the forms returned by residents.

Experience of the on-line feedback form has been that it does not produce response even to simple requests such as one for drawings to be provided at a high enough resolution to make the labels readable! All in all it is easy to understand that if there are any residents satisfied with the consultation they are few and far between.

Residents want a proper consultation

Most residents accept that there will be a development on the site and therefore do not seek to oppose a development in principle. What they want is one that it remains within planning guidelines and respects the character of the area and its conservation status. They want a consultation in which they are provided with all the key relevant facts and parameters governing the site. Until that happens they cannot be considered to have been consulted.

David Pavett, February '06

(3) Points from the GIC workshop/exhibition report

Sent to Try Homes 31st May 2006

Page 3

Exhibition was attended by 165 residents “and other interested people”. “This shows a very high level of interest”.

This followed a “high turnout” of “approximately 85” people at the two residents' workshops.

“As of 14th December 2005, we have received 76 feedback forms This represents 46% of the attendees which is very high for a consultation event of this nature”.

Page 5: General comments.

53% “generally positive”, 3% “generally negative”. (*generally negative is not recorded anywhere else.*)

Page 6

“Six people (8%) suggested that the proposed density was too high ...”.

Page 8: Design.

53% generally positive. The desire of residents, clearly expressed at the second workshop (and possibly the first) that the buildings should be no higher than the ones they replace is mentioned nowhere.

Page 10: Residential mix.

43% generally positive. Only 4 people (5%) said the

density was too high. (*Were these 4 the same or different to the 6 with the same view mentioned on page 6?*)

Page 12: Open Space.

39% generally positive.

Page 14: Retention of Campion House.

84% generally positive.

Page 16: Conclusion.

52% “overwhelmingly positive”. 31% positive with some conditions. 17% generally negative. “This is an excellent response and very useful for the forthcoming application”.

“People are clearly happy with the proposals to retain the existing Campion House building”.

“We can see that, whilst there are some concerns or need for clarification on certain issues, **a huge number of people are delighted with the proposals put forward by Try Homes**”. (Emphasis added.)

Page 17: Next Steps.

“A copy of this report will be posted on the website (www.greenissues.com/campionhouse)...” (*Never done.*)

We would like Try Homes comments on the underlined passages

If all the sections on the form (general comments, design, residential mix, open spaces, retention of CH) are given equally weighting then we get for “generally positive” $(53+53+43+39+84)/5 = 54.4\%$. So where does the 83% figure come from?

If we leave out the spurious question on the retention of Campion House (the retention is a requirement of the local authority and not a proposal from Try Homes) then we get

$(53+53+43+39)/4 = 47\%$. Thus even on their own figures less than 50% are generally positive”.

47% of 76 = **36 people**. On the other hand, **473 residents** signed a petition showing clearly that they were “generally negative” about the proposals. Which figure is the better guide to residential opinion? This will not be difficult for most people to answer.

Whether we take the 54.4% or the 47% we get around 40 people “generally positive about the development proposals. Try Homes appear to think that this is a “huge number”. Few are likely to agree. (Even if we accepted the 83% figure that would still only give 64 people.)

David Pavett, 31st May 2006

Note (added 21st July): A copy of the Report on the consultation was finally placed on the Green Issues Communications website after receipt of the above points!

(4) Reply to our points from Green Issues Communications

Dear Mr Pavett,

Thank you for your letter outlining concerns that you have with regard to our exhibition and workshop reports. I am happy to take this opportunity to provide you with some clarification on a number of points.

Please bear in mind that, as it is explained, the report mirrors the feedback forms in that it is divided into specific sections which help to encourage varied comments from participants and aid data analysis. Comments are listed under the section that they were made.

With this in mind, you note that those who mention 'generally negative' comments in the General Comments section are not mentioned elsewhere. People who mention such comments do not always make similar comments in other fields, or may be more specific in the concerns, and therefore would not be noted unless they said the same again under another heading.

With regard to your query about the number of people concerned about density, you are correct in your assertion, as we make it clear, that six people mentioned this in the 'General Comments' section whilst only four people noted it in the 'Residential mix' section. There may be some overlap and one would assume that somebody who raised this issue in one section would be more likely to mention it again in another, although we cannot say this for certain.

You claim that the desire for the “buildings be no higher than those that they are replacing” is not mentioned. You will note however that on page four of the workshop report, under the 'Design' section, it is clearly stated that six of the workshop boards featured the desire for “buildings to be no higher than present”. In the exhibition report four people (5%) expressed concern over the height of the buildings under the Design section on the page 8.

With regard to your claim that we state that 83% of people were positive about the scheme, this is actually an allegation made based on a misrepresentation of our report. If I may quote the relevant passage, it reads:

“We can estimate that approximately 52% of feedback reports are overwhelmingly positive, with 31% being positive with conditions or some concerns.”

This figure is reached by a general review of the feedback forms and a consideration of whether all of their comments in their entirety make their form generally positive or negative – or indeed whether they have conditions (such as increasing parking provision) which would make them support the scheme. In this way, somebody who makes ten very positive comments across every section of the form would be counted as one positive person rather than two (ten divided by five) as they would in your own equation.

With regard to the accessibility of the reports, we would like to take this opportunity to apologise for not having placed them on the website previously, however they are now online for anyone to view and/or download. In addition to this, everybody who left their contact details and all relevant councillors were sent copies of the reports by post.

I hope this helps to clarify some of your concerns.

Best wishes

Richard Royal

Account Manager

Note (added 21st July): This letter was undated but it was enclosed with a letter dated 8th June from Tom Nicholson of Try Homes.

(5) Our Reply to Green Issues Communications

dated: 20th June

Dear Mr Royal,

Thank your for your note (undated) which was attached to Mr Nicholuson's letter to me of 8th June.

To my comment that the desire of residents, clearly expressed at the workshops, that the new buildings should be no higher than the ones they replace is not mentioned in the report. You reply that it was mentioned on page four of the Workshop Report. I perhaps could have been clearer but I would have thought that it was evident that my detailed comments were based on the Exhibition report. No matter. What this shows is how poor the feedback form was at eliciting residents' concerns since it remains a fact that at the second workshop, which I attended, general approval was shown whenever someone made this point.

Ultimately, however, these points are relatively trivial since, even neglecting the serious shortcomings of the workshop/exhibition process and that of the feedback form, it still remains clear that concluding remarks in the Exhibition Report are not supported by the data in the report itself.

You point out that I have totalled the opinions expressed in different sections of the report, rather than people filling in the reports, giving a maximum total of 76 x 5 rather than of 76. You are right about that. There is a basic issue here which I am sure that, as a firm involved with issues of local democracy, you are aware of. The issue is analogous to the problems of the first past the post electoral method as opposed to proportional representation.

It is more informative to sum over individual sections of the report rather than over reports taken as a whole. The reason is clear as is illustrated by the following:

Illustrative example. Summing over 5 sections (FF = number of feedback forms, P = number of sections with positive reponse, N = number of sections with negative response). Totals in bold.

<i>FF</i>	<i>P</i>	<i>N</i>
39	3	2
37	0	5
76	117	263

Here we see that if we sum over individual forms taken as a whole (your method) we get a majority who are generally positive (39 as against 37). If we sum over individual sections (my method) then we get a majority of sections responding negatively (263 as against 117). All this is well known to everyone concerned with measuring opinion. Of course summing questions suggests that questions should be weighted but even summing individual forms as a whole doesn't avoid this since questions if there is no explicit weighting then all questions implicitly have equal weighting.

Despite these problems, however, and even if we use *your* method of totalling, your figures *still* do not make sense.

You describe my point that your report claims 83% support for the Try Homes proposals as an “allegation” (bizarre) and as a “misrepresentation”. You follow this with a quote from the report:

“We can estimate that approximately 52% of feedback reports are overwhelmingly positive, with 31% being positive with conditions or some concerns.”

These two categories are distinct since those with conditions and some concerns cannot be those who are “overwhelmingly positive”. I therefore added the two categories to get those who felt positive about the proposals (either “overwhelmingly” or with conditions). This gives 52 + 31 = 83%. Your objection to this simple calculation is a mystery to me. I should be grateful if you would explain what you believe my mistake is.

If we follow your method and sum over individual individuals rather than over issues then your report does not provide the information required to check your results, as I am sure you understand. Even so with the information available we can say what the most positive outcome of this method could be.

There were 76 forms returned. Of these the ones which were said to be generally positive on each of the five sections gave the following numbers: 40, 40, 33, 30, 64. The maximum possible number of forms returning an overall favourable result in the majority of sections is therefore 40. This gives us a percentage of individuals showing an overall positive response of 53%. So, to repeat, where does the figure of 83% of forms being generally positive come from?

I understand that you, as a representative of a company hired by Try Homes, feel it necessary to defend this report. You are doing so however despite overwhelming evidence that it does not reflect the views of local residents. One does not have to be a cynic to ask if a company which advertises itself as being able to help developers get their projects through the local planning process (your website) is best placed to make an objective evaluation of the objections of local residents.

Beyond that is it likely that having been employed to help see a project through you would hold a consultation and then say to the company "Unfortunately the majority of local residents are opposed to this project so we would advise you to re-think it"?

It would have been perfectly easy to provide residents with all the background information they needed. This would not have required overloading anyone but simply making all the relevant information available to those who wanted it. This could have been done in the form of documents made available at the meetings (or even better before them). Such documentation could have been provided on your website. Thus residents could have been advised about the Council's Draft Planning Position Statement. They could have been told about the local listing of Campion House and what this meant. They could have been advised about the relevant planning guidelines and the constraints these imposed. None of this was even attempted and the reasons are not far to seek. Doing that would have been to give the residents the ability to make up their own minds on the basis of access to all the relevant information and not on the flimsy information actually provided fleetingly on notice boards with no back-up papers to take away for careful consideration. Empowering residents in this way is presumably not what the developer pays you for and that is hardly surprising.

Your website is an enduring example of the limitations of the information you have provided. It is also surely significant that, despite the claims of substantial changes being made in response to residents concerns, the website has remained unchanged since last November. This would have been such an easy and cost effective way of keeping residents informed. From the fact that you have not done so it seems possible only to conclude that you had reasons for not wanting to do so.

Finally I would like to repeat two points in my original note that you have chosen to ignore.

First even your own report, despite all its limitations only shows about 40 people to be generally favourable to the project. Even if we accepted your 83% figure this would still only amount to 64 people in favour. Campion Concerns organised a petition, which we were careful to give to residents before we asked them to sign it. 473 residents signed it representing nearly 100% of the people we were able to approach. There is therefore no good evidence for general support for the project, on the contrary there is considerable evidence to the contrary.

Second, you have not responded to the point that the retention of Campion House was not something that Try Homes agreed to in response to residents' views. It was a requirement from the local authority and it was disingenuous to present its retention otherwise. For the same reason the inclusion of a question about the retention of the House in the feedback form (the one that got by far the largest positive response) was entirely spurious. It is difficult to see its role there as anything other than an attempt to skew the statistics in favour of the Try Homes proposals.

I look forward to reading your response to the point made above.

Yours sincerely

David Pavett

Note (added 21st July): No reply or acknowledgement was every received from either Try Homes or Green Issues Communications.