



# Hampstead Heath Bathing Ponds

Findings from six focus groups



CENTRE FOR  
CONSULTATION

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# Executive Summary

The Hampstead Heath Bathing Ponds are much-loved spaces where many swimmers find peace, community, and a strong sense of belonging. As part of the City of London Corporation's consultation on future access arrangements, the Centre for Consultation ran six focus groups with 33 pond users to understand how different access options might affect their experience of using the Ponds. The groups explored three main options presented in the consultation:

- Option 1(a) – Strictly single-sex access
- Option 1(b) – Continuing to be trans-inclusive spaces as currently operated
- Option 1(f) – Making all ponds mixed-sex spaces

Participants were also invited to reflect on practical issues relevant to other consultation options, such as improvements to changing facilities and the idea of time-based access. Although these were not discussed as full options in their own right, they were explored through prompts to ensure their implications were understood.

Across all groups, people spoke with deep affection about what the Ponds mean to them. Many described them as places of sanctuary, emotional refuge, and calm. The Ladies' Pond, in particular, was spoken about as a rare space where people feel able to be themselves without judgement.

## Views on the Options

- **Option 1(a) Strictly single-sex access received very little support.** Most felt it would damage the inclusive atmosphere of the Ponds, require intrusive or impractical identity checks, create tensions between users, and undermine the sense of safety for both trans and cisgender swimmers. A small minority of cisgender women favoured this option because they felt it best protected privacy and women-only space.
- **Option 1(b) Continuing to be trans-inclusive as currently operated received the broadest support.** Many felt it keeps the Ponds welcoming, reflects decades of safe practice, and focuses attention on behaviour rather than on people's bodies. Some participants suggested small improvements such as clearer privacy options in changing areas to help support the needs and comfort of all users.
- **Option 1(f) Making all ponds mixed-sex spaces was the least preferred option.** Participants felt that removing the single-sex ponds would fundamentally change what makes the Ponds special, particularly the calming and restorative atmosphere that the Ladies' Ponds offer. Some also feared this option might be used as a compromise if the debate between Options 1(a) and 1(b) became too polarised.

## **Other Insights**

People also shared their views on related issues in the consultation:

- Many felt changing facilities could be improved sensitively, without forcing anyone into separate spaces.
- Time-based or rotational access was generally seen as unworkable, confusing, and potentially unsafe, particularly for trans users who could become more visible or exposed to hostility.

## **Principles for Decision-Making**

Across the groups, several shared principles emerged. Participants felt that future decisions should:

- Be based on evidence and real experiences, not assumptions or national debates.
- Protect the atmosphere of calm, refuge and acceptance that the Ponds are known for.
- Treat all users with dignity, kindness, and respect.
- Ensure any new rules are practical, fair and safe for both swimmers and staff.
- Recognise the Ponds' long history, including the long presence of trans and gender-diverse swimmers.

## **Overall**

Most participants favoured continuing the current trans-inclusive model, with thoughtful changes to support privacy and comfort for all users. They expressed hope that future decisions will preserve what makes the Ponds unique and avoid unnecessary division. Above all, participants emphasised that the Ponds are more than just swimming facilities: they are places of community, wellbeing, and emotional significance, and should be protected with care.

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# Introduction

The Hampstead Heath Bathing Ponds hold deep cultural and emotional significance for many Londoners. They are valued not only as places to swim but also as spaces of sanctuary, community and personal restoration.

As part of the City of London Corporation's consultation on future access arrangements, six focus groups were convened to deepen understanding of how current and potential changes impact on those who use the Ponds. The purpose of the groups was to explore swimmer's experiences and their perspectives on three overarching options that address future access arrangements. The findings here will be used in the analysis of the wider consultation activity to inform future decision-making.

Pond users were invited to reflect on what the Ponds mean to them, how they experience safety, privacy, dignity and belonging, and how different access options might affect their experience of using the Ponds.

The focus groups explored three overarching options, reflecting those set out in the consultation documentation:

**Option 1(a):** Strictly single-sex access

**Option 1(b):** Continuing to be trans-inclusive spaces as currently operated

**Option 1(f):** Making all ponds mixed-sex spaces

**While the focus groups explored these three overarching access models in depth, the public consultation set out several additional options: namely 1(c), 1(d) and 1(e). Because the focus groups were designed to create space for deeper discussion rather than exhaustive option-by-option testing, these options were not treated as standalone discussion items. However, they were integrated into the conversation through targeted prompts.**

Participants were invited to reflect on practical considerations such as changing-rooms, privacy infrastructure, and the feasibility and safety of rotational or scheduled access times. These prompts ensured that the operational, safety, and comfort-related issues underpinning Options 1(d) and 1(e) in the consultation document were captured within the discussion of the main access models. As a result, although the groups centred their deliberation on Options 1(a), 1(b) and 1(f), their insights also directly addressed the implications, feasibility and acceptability of the wider range of options included in the consultation.

The language associated with this debate can be considered complex and difficult for non-experts to fully comprehend. We were not expecting participants to be expert in the issue at hand, and were instead seeking their views on their own experience of using the ponds, and what potential changes might mean for them. For some individuals, certain phrases are loaded and have particular viewpoints embedded in them that can feel derogatory and/or discriminatory. Terms like 'biological sex' or 'sex assigned at birth' may seem unproblematic to some, but they foreclose some people's perception of the nature of sex and gender. In discussing these issues, we have used 'strictly single sex' to mean based on biological sex, or sex assigned at birth: consistency with the language used in the consultation document.

This report reflects the diversity of views expressed within the groups, identifies areas of convergence and divergence, and highlights the values and considerations that participants believe should shape the future of these much-loved and valuable spaces.

# Recruitment Process

The City of London Corporation provided the Centre for Consultation with a list of 114 email addresses belonging to swimming season ticket holders and members of the swimming ponds associations.

All individuals were contacted by email and invited to complete a short sign-up survey. The survey asked respondents to identify the session that best reflected their lived experience, with the aim of ensuring that the focus groups represented a range of gender identities. The categories offered were:

- Transgender women and/or non-binary people who use or have used the ponds and/or changing facilities.
- Transgender men and/or non-binary people who use or have used the ponds and/or changing facilities.
- Cisgender women who currently use the ponds and/or changing facilities.
- Cisgender men who currently use the ponds and/or changing facilities
- Cisgender women who have stopped using the ponds and/or changing facilities.
- Cisgender men who have stopped using the ponds and or changing facilities.

Definitions were included to support clarity in self-identification. Transgender referred to someone whose gender identity is different from the sex they were assigned at birth, and non-binary referred to someone whose gender is not exclusively male or female. Cisgender referred to someone whose gender identity is the same as the sex they were assigned at birth.

Fifty pond users completed the survey and expressed their interest in taking part. The original intention was to use a software tool called Panelot to randomly select participants across the six lived experience categories to ensure balanced representation. However, this was not required: sign-ups were uneven, with a large proportion of respondents identifying as cisgender women who currently use the ponds. Only one respondent identified as someone who had stopped using the ponds. Given the small number and to ensure they could participate, they were included in a cisgender group.

There were no sign-ups in the category for transgender men and/or non-binary users, and only three respondents identified as cisgender men who currently use the ponds and/or changing facilities.

These patterns meant that some categories could not form standalone groups. In light of this, and to maximise participation and include all interested voices, the decision was made to convene six focus groups that attempted to accommodate every expression of interest.

Scheduling was based on preferences shared in their sign up forms. This left six individuals who could not initially be accommodated at their preferred session time. They were telephoned and offered alternatives. Two accepted and were integrated into other groups. Four were unable to attend any available times. These comprised three cisgender women and one cisgender man.

Where respondents had provided telephone numbers, they were contacted in advance to confirm attendance. Participants who did not attend their scheduled session were followed up and offered an opportunity to join a later group where possible.

In total, 33 participants attended the six sessions. The final group composition was:

- **Focus group 1:** Cisgender women who currently use the ponds and or changing facilities, 3 participants.
- **Focus group 2:** Transgender women and or non-binary people who use or have used the ponds and or changing facilities, 7 participants.
- **Focus group 3:** Cisgender women who currently use the ponds and or changing facilities, 7 participants.
- **Focus group 4:** Cisgender women who currently use the ponds and or changing facilities, 10 participants.
- **Focus group 5:** Cisgender women who currently use the ponds and or changing facilities, 4 participants.
- **Focus group 6:** Cisgender men who currently use the ponds and or changing facilities, 2 participants.

To understand the pond user's experiences and perspectives on potential future access arrangements at the ponds, each group followed a consistent discussion framework.

## **Structure of the discussion**

All focus groups were held in person and ran for approximately two hours. Although an outline structure was provided at the start of the session, conversations were free flowing and participants moved naturally between topics based on their experiences and priorities.

Each session covered the following core discussion areas:

**Option 1(a):** Strictly Single-sex access

**Option 1(b):** Continuing to be trans-inclusive as currently operated

**Option 1(f):** Making all ponds mixed-sex spaces

**Principles** for future decision making

**Final reflections and messages** to decision makers

After a brief explanation of each option, the facilitator invited participants to discuss how it would affect them personally. Prompts were available to support exploration of safety, privacy, inclusion, belonging, atmosphere, operational considerations and potential unintended consequences. The final section focused on the principles and values participants felt should guide the City of London's decision making.

## **Facilitation approach**

Each session was facilitated by an experienced practitioner, supported by a scribe who recorded key points on flipcharts in real time. Sessions began with a set of shared expectations that encouraged participants to listen to understand, speak from personal experience, raise questions about language, make space for others and maintain confidentiality outside the room.

## **Data capture**

The flipchart record created during each session formed the primary dataset for analysis. No audio recordings were taken, and no separate observational notes were produced. Flipchart notes captured participants' views as closely as possible through transparent and real time documentation by the scribe. Participants were invited to amend or correct anything that was written.

**Thematic analysis**

After all six groups were completed, the Centre for Consultation carried out a thematic analysis of the dataset. This involved reviewing the flipchart records, identifying recurring patterns and noting the differences across groups and minority viewpoints. Themes were developed for each access option and for the principles that participants felt should guide future decision making. The findings presented in this report reflect the systematic coding and interpretation undertaken.

# Findings by Option

## Option 1(a): Strictly single-sex access

Across all groups, Option 1(a) attracted very little support.

While a small minority of cisgender women favoured introducing Option 1(a), the majority of participants opposed this model. They felt that moving from the current trans-inclusive arrangements (Option 1(b)) to a 'strictly single-sex' model would fundamentally alter the atmosphere, values and functioning of the Ponds. For most, Option 1(a) raised significant concerns about identity policing, safety, community cohesion and the practicality of enforcement. Although much of the discussion centred on the Ladies' Pond, participants recognised that such changes would affect the culture and experience of all three Ponds.

Most participants understood "strictly single-sex" to mean access based on biological sex or sex assigned at birth rather than gender identity. This language was felt to be problematic. Some argued it does not support inclusivity of those who are born intersex; participants shared different statistics on the number of intersex people to make the point that they would not be allowed in either or both changing areas.

Others felt this language reversed the progress that had been made with gender equality and was being used in a misleading way to pursue an anti-inclusion agenda. The term felt poorly defined, creating uncertainty who might fall within this group leading many to question how such rules would be interpreted or enforced in practice.

### **Majority View - Opposition to Option 1(a)**

Taken together, participants felt that Option 1(a) would fundamentally alter the inclusive and accepting character of the ponds. They felt this option would bring what they termed 'the nervous breakdown of society' into this space impacting negatively on what they described as 'tranquil' spaces, 'idyllic' settings, and a place where you 'can just be yourself'.

Concerns about identity policing, safety risks, practical unworkability and harm to both atmosphere and community cohesion were raised consistently across groups. For most participants, these interconnected issues led them to conclude that access based on 'strictly single-sex' would introduce more conflict and discomfort for all pond users than it resolved.

Some went on to argue this was 'never an issue in the ponds', and the notices and consultation signage had created a problem that does not exist in reality. Despite being pleased to respond to the consultation, they felt that post consultation, positive action will be required to ensure pond users feel the inclusive nature of the ponds remains.

### **Policing Identity Will Damage the Ponds' Character**

Participants across all groups repeatedly stressed that Option 1(a) would require the policing of appearance or identity in ways that are fundamentally subjective, and at odds with the Ponds' longstanding inclusive and accepting culture. Many described any move toward appearance-based policing as '**not in the inclusive and accepting spirit of the Ponds**', warning that it would '**destroy the inclusive character of the Ponds that makes it so special**', and '**transform a sanctuary like environment into one marked by judgement**'.

The Ladies' Pond was described as one of the few places where they can arrive as themselves, no matter who they are physically or emotionally, and feel 'at ease with our bodies'. Free from social pressures around appearance or conformity, several referred to it as a "beautiful," "sacred" and emotionally restorative part of the Heath, often used as a source of "emotional refuge" and mental wellbeing. Participants felt that if users were required to prove or justify their physical bodies, this atmosphere would be irrevocably changed for everyone.

Identity based rules risk legitimising the policing of women's bodies by other users. They highlighted that scrutiny of appearance would not only affect trans and non-binary swimmers but also cisgender women who do not conform to binary gender expectations, including 'masculine presenting Lesbians', or 'tall women with short hair', women with mastectomies and others whose bodies fall outside stereotypical norms. Some participants reflected on their own appearance and felt they may be at risk of scrutiny. As one woman asked, 'Are we really saying only people who look a certain way can come?'

### **Identity Policing Creates Real Safety Risks**

Swimmers repeatedly emphasised that Option 1(a) would not make the Ponds safer; rather, it would create new risks for both swimmers and staff. Requiring appearance-based assessments was seen as likely to provoke conflict, confrontation and accusations, placing swimmers and staff in tense and potentially unsafe situations.

This option could implicitly permit swimmers to scrutinise or challenge others based on appearance, creating opportunities for harassment. They feared this would particularly

affect trans women and gender non-conforming cis women, and would undermine the Ponds' ethos of kindness, refuge and non-judgement. Many felt that such dynamics would increase anxiety, reduce emotional safety and intensify the tensions that had already emerged during the consultation.

Lifeguards were described as being placed 'on the frontline' of disputes about issues they are neither trained in, nor expected to manage, and this was felt to be inappropriate and 'unfair' with swimmers worried for their safety in doing so.

### **Practical and Ethical Challenges of Enforcement**

Many argued that Option 1(a) could not be enforced without resorting to methods they considered 'unworkable', 'invasive' or 'absurd'. They rejected the idea that access could be determined through birth certificates, identity documents (Gender Recognition Certificates) or even anatomy checks, regarding any such system as 'cruel' and fundamentally inappropriate for a public swimming space.

Some also argued that a strict biological definition, in line with the Supreme Court ruling, would produce contradictory outcomes. For example, trans men who present as men would be required to use the Ladies' Pond, creating discomfort for everyone involved, and vice versa. These contradictions reinforced the view that Option 1(a) is practically unmanageable and would undermine, rather than enhance, safety and comfort.

### **Lack of Evidence to Justify Exclusion**

One of the first questions asked by participants was 'how many incidents have there been'? With the exception of one person, no other participants had witnessed men going against the spirit of inclusion in the ponds. Several described trans inclusion as a 'non-issue' that had quietly functioned for years without compromising safety, with many saying they '**didn't know it was trans-inclusive until the notices for the consultation went up**'. They repeatedly emphasised that inappropriate behaviour from any user, on the rare occasion it might occur, should be addressed through behaviour policies rather than through sex-based identity exclusions. Many supported the principle that the ponds should '**police behaviours, not bodies**'.

Some participants expressed that Option 1(a) risked favouring the discomfort of a small minority over the rights and wellbeing of an already marginalised group who experience various other forms of discrimination.

### **Harm to Trans and Non-Binary Wellbeing**

Others spoke about the role of the Ponds in providing affirmation, 'gender euphoria' and 'groundedness' for trans women, and feared that exclusion would have severe impacts on wellbeing. Trans and non-binary participants described increasing anxiety and scrutiny since the public debate began, with some avoiding the Ponds entirely. Some cis participants also expressed concern about withdrawing access to a space that offers significant emotional refuge, safety and dignity to friends and family members.

### **Impact on Community Cohesion and Moral Identity**

Participants across groups feared that adopting Option 1(a) would damage community cohesion, increase division among swimmers, and undermine the Ponds' moral identity as a place of openness and care. Several participants said they would stop using the Ponds altogether if exclusionary policies were adopted, feeling that such a shift would violate the values that make the space meaningful to them. For these participants, Option 1(a) risked turning a space of community and inclusivity that they cherished and into a symbol of division.

### **Longstanding History of Inclusion**

Participants also highlighted the long history of trans inclusion at the Ponds, noting that trans people have 'swum there for decades without issue'. Many felt that Option 1(a) was driven not by community experience but by external campaigns unrelated to the lived reality of swimmers.

Participants described the issue as a product of a wider 'culture war' that the Ponds had been dragged into and which bore little resemblance to the day-to-day reality of the space. As one participant put it, 'It feels like the rest of society is having a nervous breakdown, the Ponds are not part of that and shouldn't be dragged into it'.

Several participants said they had already begun to feel the effects of this external pressure. Trans and non-binary swimmers described experiencing increased hostility since the consultation was announced, including strangers feeling newly entitled to scrutinise or question them. Others spoke of a rise in tension and suspicion, noting the presence of anti-trans stickers in changing areas and other spaces that had long been defined by ease and acceptance. One woman captured this sentiment succinctly: 'Don't turn my beautiful space into a battleground.'

### **Option 1(a) - Minority View**

A small minority of cisgender women supported Option 1(a) because they felt that strictly sex-based boundaries were essential to preserving the purpose, dignity and safety of the Ladies' Pond. For these participants, women only spaces were already rare in society, often the result of long struggles against misogyny, objectification and male violence. They felt that trans inclusive access '**represented another concession of space that women could ill afford to lose**'. Several described feeling that their dignity had already been compromised under the current model and that women were being asked to absorb the discomfort created by this ambiguity about who is permitted to use the space.

### **Protecting dignity and women's spaces**

These participants viewed the Ladies' Pond as one of the few places where women should be able to rely on clear and predictable boundaries. They felt that only access defined by 'biological sex' could maintain the emotional safety that the space was intended to provide. For some, inclusivity was a conflicted term because, in their view, expanding inclusion to trans women meant excluding or displacing women who relied on the pond for privacy and comfort. They argued that Option 1(a) safeguarded their rights as a protected group.

### **Safety concerns in intimate spaces**

Safety was a central theme in their reasoning. They felt that women could not feel secure unless the pond was strictly single sex, and that clear rules were needed so that women felt empowered to challenge or report anyone they believed should not be there. Several women expressed discomfort about encountering individuals they perceived as male bodied in changing rooms or shower areas, describing these as the settings where they felt most exposed.

Some participants linked their views to personal experiences, including one who described being intentionally exposed to male genitals by an individual who, she said, identified as a woman. Another recounted her friend feeling ogled in the shower area. These accounts were not shared by the majority but shaped the concerns of those who raised them. They described feeling uncertain about how to report such incidents and expressed frustration that their previous reports had, in their view, not been taken seriously by staff or relevant organisations. These experiences reinforced their belief that only Option 1(a) could ensure women's safety.

**Perceptions of fairness, legality and historical precedent**

Some participants highlighted that the Ponds had historically operated as single sex spaces and felt this precedent should be respected. Several referred specifically to the recent Supreme Court ruling on the Equality Act, which they understood as clarifying that single sex spaces could lawfully be defined on the basis of biological sex [though worth noting that this was already possible if 'proportionate']. They believed that this ruling was intended to help protect women's spaces and therefore showed, in their view, that the City of London Corporation would be acting within both the law and the spirit of that judgement if it adopted a stricter sex-based access model.

**Concerns for other user groups**

Excluding trans men and women and directing them to the Mixed Pond was seen as a way of including other vulnerable users such as younger girls, Muslim women and orthodox Jewish women whose cultural or personal needs made sex-based separation especially important. They felt that some of these users may already be avoiding the Ladies' Pond because they believe that trans women are permitted to use it under the current access arrangements.

For those with these views, Option 1(a) was the only model that preserved what they saw as the meaning, predictability and emotional safety of a women only space.

# Findings by Option

## Option 1(b): Continuing to be trans-inclusive spaces as currently operated

Option 1(b) invited participants to consider retaining the current trans inclusive arrangements at the Men's and Ladies' Ponds. This is the current policy and was therefore familiar to swimmers, many of whom drew on years or decades of experience to describe how it works in practice. Across groups, participants reflected on what the current system enables, where improvements could be made and how different users experience safety, privacy, dignity and atmosphere under the present approach.

While Option 1(b) attracted strong and broad support, a minority of cisgender women expressed discomfort or opposition, primarily relating to privacy in changing areas or different understandings of what constitutes a women only space. We have therefore included suggestions for improvement below that swimmers felt might mitigate the fear and position of those who prefer Option 1(a).

### **Majority View – Support for Option 1(b)**

#### **Preserving the Atmosphere of Sanctuary**

The Ponds were described as uniquely restorative environments: 'healing', 'sacred', and emotionally safe. The Ladies' Pond in particular was seen as a place where women can 'arrive as themselves', feel at ease with their bodies and let go of external pressures. Participants felt that retaining the current model best protects this atmosphere. They worried that any shift to appearance based or identity checking under Option 1(a) would introduce scrutiny and tension, undermining the non-judgemental ethos that defines the Ponds.

#### **Historical Continuity and Proven Safety**

Highlighting the long history of trans inclusion, noting that trans women have used the Ponds for decades without incident, many described this as a 'non-issue' in everyday pond life. They questioned what would be gained by changing an arrangement that has already demonstrated its stability and safety, expressing concern that Option 1(a) would unnecessarily disrupt a system that works.

### **Focusing on Behaviour, Not Identity**

A central principle for many participants was that the Ponds should ‘**police behaviours, not bodies.**’ They felt that (rare) inappropriate behaviour should be addressed through existing behavioural policies rather than identity-based exclusions. For these participants, Option 1(b) represents a proportionate, ethical and practical model that supports safety without compromising the dignity of trans people.

### **Protecting a Vulnerable Group**

Participants repeatedly emphasised that trans women are a vulnerable group who already face high levels of discrimination and hostility. Several trans and non-binary swimmers described feeling heightened anxiety since the consultation began, including changing when they visit or avoiding the Ponds due to fear of hostility. Many cisgender participants felt a moral responsibility to protect access to a space that provides trans women with affirmation, refuge and emotional safety. They expressed concern that Option 1(a) would deepen exclusion and result in further harm.

### **Respecting Democratic Decisions**

Many felt that the recent rise in tension around the Ponds was driven by external activism rather than swimmers’ lived experience. They feared that abandoning the current model would entrench this politicisation, turning the Ponds into a site of cultural conflict rather than a place of calm and community.

They noted that local democratic processes, such as dialogue followed by voting by the Ladies’ Pond Association, had twice supported trans inclusion. They felt that this should carry substantial weight and expressed frustration that the issue was being reopened despite these outcomes.

Retaining Option 1(b) was seen as a way to refocus on swimmers’ real experiences and maintain the Ponds as a refuge from wider social debates.

### **Opportunities for Improvement Within Option 1(b)**

Although supportive of Option 1(b), many participants saw scope for improvement, particularly regarding inclusivity, communication and privacy.

### **Transgender and Non-Binary Inclusion**

Several trans and non-binary participants described the consultation process as having shifted the conversation into a defensive posture, casting Option 1(b) as a “concession” rather than the baseline of inclusion it has historically been. They saw this moment as an opportunity to strengthen the current arrangements in the spirit of that inclusivity whilst

acknowledging the fear expressed by a minority of swimmers.

A recurring concern was the reliance on 'passing' under the current arrangements. Participants explained that users who passed as cis were less likely to be questioned or scrutinised, while those who did not pass, could experience greater anxiety and, in some cases, avoid the Ponds altogether. For example, one participant said they avoid swimming when they know hostile groups may be present, while others described how pre-top-surgery trans men often do not swim anywhere due to fear of exposure. Non-binary and non-passing transfeminine swimmers described having no clear place under the current binary system, leading some to use only the Mixed Pond despite wanting access to the restorative experience of the Ladies' Pond. Participants suggested explicit inclusion of non-binary people within access policies could improve inclusivity and reduce reliance on passing.

### **Changing and Privacy Infrastructure**

Several participants proposed modest enhancements to changing areas, including additional cubicles, curtains or clearer signage within the single sex changing areas. They felt these adjustments would help support privacy for all users, including those with trauma histories, cultural modesty needs or personal boundaries around nudity. They stressed that these suggestions were about improving comfort and usability for all, not restricting access for trans women or creating new forms of separation.

### **Minority View – Opposition to Option 1(b)**

A minority of cisgender women opposed Option 1(b), arguing that trans inclusive access could not provide the predictability, privacy or emotional safety they expected in a woman only space. They felt that access based on self-identification created uncertainty in intimate settings such as showers and changing rooms, where they felt most exposed and vulnerable.

Some participants referred to personal or second-hand experiences that shaped their discomfort, including feeling watched by 'men claiming to identify as a woman that day'. These accounts were not shared by the majority and were challenged by other participants, but for those who raised them, they signalled that the current model lacked adequate safeguards.

Other opposition was framed in terms of fairness and boundaries. They argued that including trans women within the definition of 'women only' effectively excluded some women who would no longer feel able to use the space. For these participants, inclusion and exclusion were intertwined: expanding access to one group was seen as reducing

the accessibility or predictability of the pond for others, particularly women with trauma histories, strict modesty requirements or personal boundaries that rely on single sex separation. As a result, these participants rejected Option 1(b).

# Findings by Option

## Option 1(f): Making all ponds mixed-sex spaces

Across all groups, participants expressed strong opposition to Option 1(f). With the exception of one cisgender woman, no participant endorsed mixed sex access as a desirable model. Participants consistently felt that converting the Ladies' and Men's Ponds into mixed spaces would fundamentally alter the character, purpose and emotional significance of the ponds. Participants described the Ladies' Pond as a sanctuary like environment, valued for its calmness, sense of ease and freedom from gendered scrutiny.

They spoke about appreciating a space that was free from the 'male gaze' and from 'performative behaviour'. Many contrasted this with the existing Mixed Pond, which they viewed as sociable but less tranquil, and felt that extending this culture across all ponds would diminish the diversity of experiences currently available. For many, losing the single sex ponds would represent a historic loss of a space with deep cultural meaning.

Participants also expressed concern about how the broader consultation debate might influence decision making. Some worried that prolonged disagreement between Option 1(a) and Option 1(b) could lead the authorities to default to Option 1(f) as a perceived compromise. Others feared that a mixed sex model might encourage cost cutting, including reduced opening times or even future closure of specific ponds, which they felt would represent a significant loss and exacerbate overcrowding.

Overall, participants regarded Option 1(f) as a 'lose–lose' scenario that would remove a unique and historically significant single sex resource without resolving the underlying issues raised in the consultation.

### **Caveat from the Men's Group**

The two cisgender men who participated noted that, if forced to choose between Option 1(a) and Option 1(b), they would reluctantly prefer mixed-sex access because it avoided excluding trans men and women from the Men's and Ladies' Pond. However, they did not view Option 1(f) as a positive model and emphasised that their support was comparative rather than substantive.

# Findings by Option

## Changing Facilities and Time-based arrangements

*This section relates to options 1(d) and 1(e) in the public consultation.*

Although the focus groups were designed to explore three access models in detail, participants were invited to reflect on changing facilities and the possibility of time-based arrangements. These prompts were included to ensure the consultation captured operational insights relevant to Options 1(d) and 1(e) in the wider public consultation, and offered reactions to specific elements that might affect privacy, safety, comfort and access.

### **Changing facilities**

Participants were asked to consider how adjustments to changing spaces might support user comfort, privacy and safety under any future access model. Reflections included:

### **Concerns about segregated or mandatory facilities**

Requiring trans users to use the separate accessible toilet, shower or changing room, could create harmful and unsafe conditions. They worried it could effectively force trans people to disclose their gender identity, increase their visibility and leave them

vulnerable to hostility or harassment. Introducing any form of mandatory separation risked undermining the inclusive ethos of the ponds. However, the importance of having the option there for anyone who values privacy was welcomed.

A number of participants, particularly in one group, felt that the ponds could introduce or improve private cubicles or install additional curtains around shower areas to support those seeking greater privacy. They saw this as a way of addressing differing comfort levels for all, without restricting access for specific groups. At the same time, they cautioned that any new structures or gender-neutral facilities should be designed sensitively so as not to disrupt the physical landscape or detract from what some described as the 'magical' aesthetic of the Ladies' Pond. However, some emphasised that they valued the communal nature of the existing changing areas and did not want these spaces significantly altered or made more compartmentalised. For them, the open changing environment was part of the social character and history of the ponds.

### **Concerns about cost and impact on fees**

Across several groups, participants worried that major changes to changing facilities could be costly and lead to higher entry fees. They did not want improved privacy to come at the expense of affordability or accessibility for current users.

The current arrangements already include a separate changing area for those who prefer not to use communal spaces. They felt this demonstrated that differing needs can be accommodated within the existing model without resorting to mandatory separation or significant structural change.

### **Time Based Arrangements**

Participants were also invited to consider whether time based, or rotational access systems could address concerns about safety, comfort or privacy. Across the discussions, these approaches were broadly viewed as impractical and potentially harmful. Time-based systems would be difficult for swimmers to navigate and incompatible with the spontaneous or routine based nature of pond use. They felt such arrangements 'do not work functionally with people's lives', particularly for those with limited windows of availability. This arrangement has the potential to be much more exclusive, and risk greater harm to trans people who may end up experiencing protesters outside when they arrive. They noted that the approach path to the ponds is long, unmanned and lacks mobile signal; scheduling certain groups at specific times could make them identifiable and therefore more vulnerable to targeted hostility.

Overall time-based arrangements were generally seen as impractical and potentially unsafe. Participants felt that these would introduce more problems than they solved.

# Principles for Future Decision Making

## » Evidence Based

Participants across all groups stressed that decisions should be grounded in real incidents, data and lived experience rather than assumptions or national debates. A few participants also questioned the assumption that evidence is unbiased.

Many questioned whether the issues leading to the consultation reflected actual harm, noting that trans inclusion had worked quietly and safely for decades.

Several argued that policy should evolve only if supported by clear evidence of risk rather than speculation or the emotional discomfort of some users.

This raised a reporting issue for one person who said she had experienced an incident, reported it and nothing was done.

## » Protect the Atmosphere and Emotional Meaning

Groups placed strong emphasis on safeguarding the atmosphere of refuge, gentleness and psychological ease that characterises the Ponds.

Participants described the Ladies' Pond in particular as a rare sanctuary where users can feel unjudged, comfortable in their bodies and free from social pressure.

They stressed that policy decisions should protect this environment and avoid introducing scrutiny, tension or divisive dynamics that could damage the emotional and cultural significance of the Ponds.



## Respect the Ponds History

Swimmers expressed deep appreciation for the long traditions of the single sex ponds.

For some, this history had clear cultural and emotional value and should be preserved.

For others, tradition also included the long-standing presence of trans women and gender diverse swimmers.

Participants agreed that decisions should acknowledge this history and not be driven solely by contemporary political pressure.



## Tolerance

A strong ethic of inclusivity emerged across groups, rooted in kindness, acceptance and respect for dignity.

Many saw the Ponds as a space where people can simply exist without being questioned.

Participants emphasised that no user should be subjected to appearance-based scrutiny or informal policing and that discriminatory language or behaviour should not be tolerated.

While interpretations differed, most framed inclusion as central to the moral identity of the Ponds.



## Practical Enforcement

Participants widely agreed that any policy must be workable, clear and fair. They stressed that enforcement systems should not rely on subjective appearance-based judgements and should not place staff in unsafe or untenable roles.

Lifeguards were repeatedly identified as an essential source of insight whose experience should inform decision making. Participants felt strongly that any future arrangement must protect staff relationships, safety and wellbeing.

## » Safety and Safeguarding

Safety was a shared principle, though interpreted differently.

Swimmers emphasised the safety of trans women and non-binary users, viewing exclusion as harmful and unjustified.

Others stressed sex-based privacy and boundaries as core to women's safety.

Despite these differences, all groups agreed that a sense of safety is essential and that policy should support users to feel emotionally and physically secure.

## » Democratic Legitimacy

The importance of respecting democratic decisions made by the Ladies' Pond Association was emphasised.

The views of regular pond users should carry significant weight in shaping policy and that external political movements should not override local lived experience.

## » Operational Viability

Some groups identified operational sustainability as an important principle. They noted that significant infrastructure changes or a shift to mixed sex access might introduce costs or pressures that could jeopardise the long-term viability of the ponds. Participants emphasised financial responsibility and the need to protect the future operation of the sites.

## Differences Between Groups

While many principles were shared, differences emerged in how users weighted and interpreted them.

### 1. Inclusivity

Most cis women, trans women and non-binary participants framed inclusivity as essential to fairness, safety and dignity. A minority of cis women viewed biological sex as the only legitimate basis for inclusivity in the Ladies' Pond. This created divergence in how participants applied the principles of safety, privacy and dignity.

### 2. Contrasting uses of tradition

For many, tradition included decades of trans women using the Ponds. For a minority, tradition referred to women only spaces established to resist misogyny and protect dignity. Both invoked tradition, but with very different meanings.

### 3. Legal reasoning

A minority of participants believed that single sex exemptions in equality law justified or required access based on biological sex. Others countered that legal frameworks permit trans inclusive arrangements, and that legality alone should not dictate moral decisions. Several noted that law does not always align with what is just or compassionate.

### 4. Different weighting of fairness

Most participants viewed fairness through the lens of inclusion and proportionality. A few argued that fairness should not be the guiding principle because treating all groups identically might imply mixed sex access, which they opposed.

## Summary

Across all groups, participants expressed a desire for decisions that honour the emotional meaning of the Ponds, recognise the diversity of experiences among users and avoid policies that create harm or division. While there were real differences in how principles were interpreted, especially around safety and inclusion, there was strong consensus that decision making should be grounded in evidence, guided by tolerance and dignity, and designed with care for both users and staff. Participants stressed that the Ponds are more than facilities; they are places of sanctuary and community, and any future model must protect this fragile and deeply valued atmosphere.

# Conclusion

The focus groups provided swimmers' insights into what the Hampstead Heath Bathing Ponds mean to the people who use them, and how different access arrangements might shape their future. Across all groups, participants articulated a deep attachment to the Ponds as places of sanctuary, community and emotional refuge. They reflected not only on the practical implications of different options but also on the values, histories and relationships that make the Ponds distinctive.

Although the three access options prompted varied and sometimes opposing views, several common themes emerged:

- **Option 1(a) Strictly single-sex access** was preferred by a minority of cis women.
- **Option 1(b) Continuing to be trans-inclusive spaces as currently operated** emerged as the most consistently supported option across all groups.
- **Option 1(f) Making the ponds mixed-sex spaces** was the least favoured option across the groups.

Exploring the improvement of changing rooms could be a compromise so long as it is not explicitly redirecting people based on sex or gender, and instead having gender neutral spaces or additional cubicles in single sex areas to protect privacy.

There was a desire for decisions to avoid unnecessary division and to safeguard the Ponds from becoming entangled in wider political debates. For many, the Ponds symbolise a rare and fragile space of acceptance that should be protected with care.

Whatever the final decision, participants hoped that it would reflect the lived experiences of the community, respect the emotional and cultural significance of the Ponds, and preserve the qualities that make them cherished spaces for generations to come.



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