# Chapter 18: Reducing Risk in Consultation

# [Introduction]

While the best consultations are those which are transparent, accessible and provide significant opportunities for engagement, these characteristics are not free of risk. The consultor’s priority will be to run as genuine a consultation as possible while retaining an awareness of risk and taking steps necessary to mitigate it.

# Activism and negativity

Perhaps one of the greatest fears of those running a public consultation is the negativity that can be voiced by local interest groups, national activists and so-called NIMBYs[[1]](#endnote-1).

Campaign groups are rising in prominence in the UK: 1.5% of the UK population (over 1m people) are believed to be paid-up environmental group members[[2]](#endnote-2) and research suggests that campaign groups are more trusted than local MPs, councillors and the local media[[3]](#endnote-3). Not only are these groups becoming more numerous, but they are also growing in sophistication, knowledge and tactics.

Lobby groups are known to gather supporters nationally to fight a local cause, transport people to attend public meetings and protests and even set up local branches to ensure that they can infiltrate local opinion – as has been seen on many occasions in the debate over a possible third runway at Heathrow Airport.

As their very name suggests, interest groups unite around a single shared cause for which they are committed to fight. Local conservation societies, for example, are created to protect a specific locality in its current form and consequently may resist change regardless of its potential benefit. Conservation societies are typically very well run, have a committed and well-educated membership which may include politicians, will have campaigning experience and access to legal and other resources.

It is common knowledge, particularly within the property, transport and utilities sectors, that individuals are more likely to rally in objection to a proposal than in support of it. Opposition is perhaps the quickest way to unite a community and as passions run high, awareness of and support for a cause take hold quickly.

As Chapter 5 explained in detail, the internet is raising the stakes further, with individuals and groups able to set up web-based platforms and social media accounts as easily as developers. Campaign to Protect Rural England (CPRE)’s Planning Help pages exist to enable people to take action on planning applications and include sample letters of objection. Architects and planning consultants who feel their employers’ proposed schemes lack social value are encouraged by the organisation Concrete Action to upload plans anonymously as the basis for a local campaign. Similarly organisations such as Better Transport encourage individuals to campaign against NSIPs in their area.

The phenomenon of NIMBYism has developed in response to the perception that development will threaten established neighbourhoods and is fuelled by the common human characteristics of resistance to change, nostalgia and fear of the unknown. The term is sometimes used to describe all local residents who oppose a planning application. This is misleading: the label NIMBY should, if used at all, only refer to those whose objection is based on selfish motives, is subjective and, because it extends beyond material planning considerations, falls outside the remit of the consultation.

Despite there being some strong external forces in opposition to development, the development process itself is partially to blame for some negative sentiment. A concern commonly voiced by property developers is that Local Plan consultations frequently fail to consult fully and adequately. Land is then allocated for development unbeknown to local residents and it is only when a planning proposal is put forward that its neighbours are aware and raise an objection. At this point the principle of development has already been established and the developer’s consultation meets its first hurdle.

What can be done to minimise the impact of any ill-founded issues that activists, special interest groups and so-called NIMBYs can bring about, and how can these groups be to engaged more positively? Effective use of the strategy can mitigate many of these issues.

## Using research

The very first stages of the strategic process (described in Chapter 14) present the first opportunity: research and situational analysis can gain an understanding of local groups (and national groups where relevant), their motivations and methods. Initial research should help identify possible misapprehensions which can then be addressed as the strategy is developed and implemented.

**Box 18. 1**

**Correcting misapprehensions**

**Comment by Paul Butler, PB Planning**

PB Planning has been appointed by a number of clients to consult on proposals to deliver new housing developments in a variety of edge of settlement locations: sites which are located within the open countryside, Areas of Outstanding Natural Beauty and the Green Belt.

PB Planning undertakes initial research which reveals whether the proposals are likely to meet with concern from local residents who may enjoy the land in its current form and are resistant to new homes being built.

Further research is used to demonstrate the need for the development. Messages are developed which include the following statistical information:

1. Approximately 75% of the country is greenfield, of which nearly half is farmed for agriculture. If the Government’s target of an additional 200,000 homes per year were met, it would reduce greenfield land by a small fraction (circa 1-2%) over a period of 5 years.
2. The Local Plan is cited, specifically local housing demand and analysis demonstrating the suitability of the site for housing.
3. Positive messages are created around job creation, again drawing on statistics. Housebuilders have the capability to calculate how many construction and related jobs a specific development is likely to generate. The economic benefit of the scheme can then be expressed in monetary terms, providing both demonstrative and statistical reassurance.

Having met with many local residents, PB Planning also becomes aware of negative comments in relation to the planning system: there is sometimes an assumption that the planning application would automatically gain consent. Again, PB Planning tackles this issue with easily digestible figures, in this case relating to scoring in sport: for developments to be approved and then constructed the applicant needs to win ‘10-0’ i.e. ensure that the Local Planning Authority and all of the statutory consultees are in approval of the scheme. If just one of these parties are in objection to the development, then the development will not be approved i.e. ‘10-1’ is a loss to the developer.

Early stakeholder research, PEST and SWOT analyses are quick to identify issues and addressing misapprehensions early on usually results in a scheme being welcomed by local residents and planning consent granted.

## The consultation mandate

The consultation mandate as a means of crystalizing the strategic approach provides an opportunity to convey the principles of the consultation - such as its intention to be responsive, genuine, engaging and accessible. If it achieves this it can provide some reassurance to potential opposition.

Importantly, the consultation mandate is the best opportunity to put in place the rules which govern the consultation. Should it be necessary, the mandate can state that the consultation team may remove negative comment from discussion boards legitimately and dismiss irrelevant comment. For example, if it is made clear that the consultation forbids bad language or verbal attacks against individuals, the consultation mandate is justification for removing such comment. The consultation mandate will also describe methods of analysis. Where results are analysed by issue rather than by number, a postcard campaign or automatically generated email will carry little weight. The method of analysis should be clearly stated in the consultation mandate to avoid the escalation of negative sentiment.

The consultation mandate may also stipulate the boundaries of the consultation, in some cases ensuring that debate focuses on specific questions and options and will not take into account comments which do not respond to the consultation brief. This approach should only be used where there is a substantial danger of opponents dominating the consultation, changing its direction and introducing subjects which are not relevant: in some circumstances, this would be seen as too controlling, preventing discussions from developing and ideas being generated.

## The consultation remit

Conversely, it can sometimes be beneficial to extend the remit of the consultation, as greater involvement can create greater empowerment. Elsewhere in Europe many renewable energy proposals are community-led and are flourishing as a result. This can be effective in the case of wavering opposition: where a *potential* opponent is also potentially a supporter given that certain demands or assurances are met. Many critics have converted to ambassadors simply through receipt of useful and reliable information.

## Messaging and questioning

The need to communicate key messages is of paramount importance. An early focus on communicating messages provides an opportunity for development proposals and their benefits to be promoted, and substantiated with statistics such as Local Plan allocation details, housing allocations or the relevant national planning policy.

Messages should also make reference to pre-consultation dialogue – such as the fact that the local authority and its members contributed to the consultation strategy. This can potentially address some criticisms of the consultation, certainly in a political context. Additionally, if councillors put forward a negative view, this will be identified in the pre-consultation dialogue, allowing the consultation team to either adapt the proposals or to draft appropriate responses.

The response ‘none of the above’ is rarely an option in consultation. As we have seen, consultations vary significantly from those which start with a blank canvas and elicit thoughts and ideas from a local community, to those which present a draft masterplan and a set of options. In either case, the response sought from the local community will be clear from the early stages of the engagement process.

Asking the right questions is a very important means of reducing negativity. In many cases – for example in NSIP consultations or other situations where the extent of the consultation is limited – questioning must be tightly controlled to avoid discussion focussing on larger and potentially controversial issues. An NSIP project should not seek general views on the proposed development as it is not within the remit of the consultation to address the *principle* of development. Instead the consultation will focus on very specific questions such as design options and discussions about community benefits. Where necessary the consultation mandate should clearly stipulate that it is not within the remit to consider *whether* the development is to go ahead, but *how*. Contentious subjects such as new housing can also be mitigated by adapting or rephrasing questions such as ‘Do you think housing should be built on this field?’ with, ‘Do think that people would like to live here?’. Similarly, if identified, difficult issues can be addressed in the questioning, for example, ‘If the development was to include a roundabout to alleviate traffic congestion, would you support the proposed plans?’

## Monitoring, analysis and evaluation

With the potential for difficult discussions and negative feedback, there is an acute need to monitor and perhaps guide discussion. The extent of the development team’s involvement in listening and taking part in discussions should be established at the start of the consultation and agreed across the team to ensure consistency. In some cases it may be necessary, for example in online forums, only to use moderation in the case of irrelevant, obscene or defamatory remarks while in other cases it might be felt necessary to focus discussions on the agenda and correct misapprehensions. Consultors should never be tempted to enter into debate.

Development teams should bear in mind that it is not only the proposals that are open to scrutiny: an objector with an axe to grind is likely to fault the consultation too. Conversely, even a potential supporter when frustrated by the process, can develop negative views towards development proposals. Consultation strategies must be assessed to ensure that they stand up to scrutiny and their merits communicated in a consultation mandate. At the end of the process, the evaluation will demonstrate whether any criticisms about the process were justified.

## The use of an issues database

As has already been shown, engagement on proposals likely to attract negative comment may need be more tightly controlled than less contentious consultations. In consultation there is often little need to respond to points made until the end of the process; however, where contentious issues are raised and Chinese whispers and misapprehensions spread, it is often necessary to respond to emerging issues in a public forum and thereby address potentially problematic issues without delay.

It can be hard to change feelings with facts, but facts can certainly help. An issues database, whether publicly accessible or kept for reference purposes, can include figures relating to statistics (increased traffic figures in the case of a new road, housing allocations in the case of a residential development), and financial data (employment opportunities and the value of the new scheme in monetary terms).

**Box 18. 2**

**Case Study: issues register**

**Transport for London (TfL) - proposed changes to bus routes in Hounslow, Ealing and Twickenham**

Public consultation occurs on each TfL project where changes are proposed. Public consultation enables the local community to influence that change. As part of this process, a ‘responses to issues raised’ document is produced.

This document publishes the issues raised and lists the TfL response. This enables consultees to find all the answers to issues raised in one place.

Every issue raised is covered and responses are prepared jointly by the project and consultation teams.

Consultees who have supplied contact details are emailed a link to the issues register online. Additionally, hard copies are posted to those who request them.

Although issues raised are generally more likely to be of a negative nature (positive responses are more likely simply to state their approval than to raise issues), the issues register is a very constructive element of the consultation, showing how the project is intended to progress in relation to issues raised and ensuring full transparency.

## Selecting tactics

Selecting appropriate tactics can help create the right environment for positive discussion: tactics should be arrived at, their suitability having been discussed in pre-consultation dialogue to prevent criticism of the consultation itself; tactics should be sufficiently engaging to encourage the ‘silent majority’ to take part and information tactics should be used to reduce the potential for the message to spiral out of control. Unfortunately activists have been known to create misapprehensions deliberately to introduce fear and confusion: ensuring that accurate and positive messages are always accessible is the best means of combatting this.

## Use of a ‘middle man’

Difficult consultations have been known to benefit from the involvement of an objective individual who can help the community navigate the options before them without being seen to owe allegiance to the development teams.

**Box 18. 3**

**Case study: the appointment of a planning consultant to benefit local understanding**

**Peter Brett Associates - Alconbury Weald, Cambridgeshire**

Peter Brett Associates (PBA) worked with Urban and Civic to develop an Enterprise Campus, 5000 homes, 700 acres of green open space and a range of transport, energy and community facilities on a former airfield.

During PBA’s initial involvement both the planning consultants and the engagement team at Urban and Civic developed constructive relationships with local people but in the case of the local parish council it was felt that a lack of understanding of the planning process limited effective engagement.

The decision was taken to appoint and fund an independent planning consultant to work directly with the parish council. Working on a part time basis over a two year period, the planning consultant, who was local to Cambridgeshire, attended parish council meetings and worked with members between meetings to explain complexities and nuances. This enabled the parish council to gain a deeper understanding of the proposed changes. Furthermore the parish council’s trust of the development team increased and dialogue with the development team was significantly more effective.

## Negotiation

Negotiation is a common feature of consultation albeit it in varying degrees. Again the consultation mandate should recognise in which situations negotiation is possible. In a planning application for a specific scheme, viability determinants such as number of units, and political determinants such as proportions of social housing are unlikely to be a subject for consultation, along with restrictions on the land use brought about by either a legal covenant or the Local Plan. This too should be clarified in the consultation mandate. But there are many subjects which may be open to negotiation and ultimately this helps create a positive environment for future discussion.

**Box 18. 4**

**Case study: forging links with potential supporters**

**Sainsbury’s Local - Bruntsfield Place, Edinburgh**

Sainsbury’s acquired the former Peckham’s deli shop on Bruntsfield Place in Edinburgh’s Bruntsfield district, a lively shopping area with a strong mix of independent stores, national chains and coffee shops.

Sainsbury’s intention to open a convenience shop in this sensitive location became a very hot topic within the local community, with a number of neighbouring retailers concerned about the impact the opening of this store might have on their businesses.

The ‘Say no to Sainsbury’s Bruntsfield’ Facebook page was established and posters objecting to the plans put up in neighbouring businesses. A debate focused around proposals was even aired on a national radio programme.

Sainsbury’s engaged with the community and local press. A local traders’ and residents’ meeting was held and representatives from Sainsbury’s attended to present the proposals and answer questions.

The residents and traders meeting was well attended and a great number of views were expressed. Sainsbury’s offered to work with the local traders to help re-establish the traders association and assist with any schemes aimed at further enhancing the retail offer in the area. Sainsbury’s agreed to offer employment opportunities to the colleagues previously employed by Peckham’s in the new Sainsbury’s convenience store and this ensured the great customer service was able to continue.

The site was a very sensitive location and Sainsbury’s worked closely with The City of Edinburgh Council to ensure that the store’s muted design was in keeping with neighbouring properties and the local area. As a listed building in a conservation area, a great deal of attention had to go to the design of the premises, ensuring that it complimented the character of the area.

When the Sainsbury’s Local opened, six colleagues who had previously been employed by Peckham’s took up the opportunity to work in the shop. Links with the local community were further strengthened when Sainsbury’s chose Radio Lollipop as its inaugural Local Charity of the Year. At the opening of the store a Sainsbury’s employee appeared live on Radio Lollipop.

Local bars have started buying produce from the store and residents have welcomed both the improvement to the high street and the increased competition.

## Impact on reputation

Consultation teams should not be overly concerned about the odd negative comment, particularly those which are based on misunderstanding and can be explained in the consultation report. Decision-making bodies understand that negative sentiment is far more likely to reach their desks than positive sentiment. An important consideration as far as the applicant is concerned is the impact on reputation: the fact that a single negative statement, albeit inaccurate, can fuel fear and mistrust more widely. Monitoring, and responding where necessary with credible information and data, is vital to prevent rumour spreading. Meeting with groups and individuals is often the best course of action, and should groups refuse to meet, the consultation report should make this clear.

**Box 18. 5**

**A local authority’s view on letters of objection**

**Comment by Rebecca Saunt, Planning Manager East Cambridgeshire District Council**

In the majority of cases we don’t receive letters of support for applications. The majority of the comments received tend to be objecting to an application. However, even if objections are received for an application this does not mean that it will necessarily be refused.

Each application is assessed on its own merits and the comments/objections received are reviewed by the case officer to ascertain if they are material planning considerations.

If they are, the objections are assessed and addressed during the course of the application. Even if an objection is a material planning consideration, the weight given to it forms part of the assessment of the application. For example, an objection may be received in relation to overlooking, but the distance between rear inter-visible windows could be in excess of 30 metres. Our Design Guide SPD states there should be a minimum distance of 20 metres and therefore, even though an objection has been raised, the proposal would meet the requirements of our SPD and the case officer would be satisfied that there would be no impact on residential amenity and a refusal would not be issued.

A further example is an objection raised in relation to highway safety. If during the consultation process the Highways Authority has raised no objections on these grounds, while the objections would be noted and assessed as part of an application, a refusal would not be issued. If an application receives more negative comments than positive comments, this does not automatically mean that the application will be refused as the proposal will be assessed against policy and any other relevant guidance.

Petitions can cause considerable harm to reputation, particularly if it becomes difficult to communicate directly with all signatories – perhaps because they are anonymous or come from outside the area. But fortunately local authorities acknowledge that consultation is not a vote and that decisions should not be based solely on numbers. Previous emphasis on the statistical analysis of responses has changed with the advent of various forms of participatory planning. The feedback from planning workshops at which individuals have invested considerable hours, if not days, is of greater significance than some unidentifiable signatures on a scrap of paper.

## Analysis and reporting

In most cases it is in the consultation team’s power to decide how to process comment. At the very start of the consultation process it should be decided whether to collate responses per person or per issue. The latter is used most frequently because it creates a clear picture of the issues arising from the consultation. And although numbers should be attributed to comments made, analysis by issue ensures that a comment made repeatedly will only be listed once, thus giving a petition or automatically generated email as much prominence as a single individual response. Take the example of an online forum in which local residents are invited to put forward views about public art and design at a new shopping centre. The discussion is dominated by members of an anti-development pressure group who join the discussion stating that the developer is driven solely by profit and has no genuine interest in the local community. This single viewpoint would carry little weight in the final analysis: the issue is based on misinformation and is potentially defamatory (and therefore could be removed for legal reasons), it does not respond to either the specific question or the remit of the consultation, and those responding may not be local residents. The only meaningful information that this produces for the purposes of the consultation report, and therefore the planning application, is that landscaping and public art at the new development are not of particular concern to local residents.

As this example shows, negative views are often either individually motivated or promoted by an external group with a specific cause. Frequently their views do not represent those of the wider community and this must be reflected in the reporting. Similarly the consultation report need only include material planning considerations. ‘It will spoil my view’, ‘We don’t want more affordable housing’ and, ‘The developer is just in it to make a profit’ are not material planning considerations.

The consultation report should also take into account representation. If only 20 people respond to a consultation and are 100% opposed to the proposals, is this a negative outcome? If 500 people were contacted and given ample opportunity to respond it may be concluded that the proposal is of little concern to the majority of the community. The consultation report should consider the view in the context of the wider community and determine whether the low response was due to lack of awareness or lack of concern. If the applicant can demonstrate that all residents were given substantial opportunity to comment it could be deduced that those who chose not to respond did so because they were accepting of the proposals.

Analysis can be carried out in such a way that opinion from national pressure groups is recognised as such and priority is given to views from local residents. Thus, the most harm caused by national groups is a negative impact on the developer’s reputation which may lead to negative comments from within the community.

**Box 18. 6**

**Case study: dealing with negative sentiment**

**Brooke Smith Planning (on behalf of Central England Co-operative Limited) – Wirksworth, Derbyshire**

Brooke Smith Planning (BSP) was appointed to prepare a planning application for the redevelopment of an existing convenience retail outlet and petrol filling station in the Derbyshire market town of Wirksworth.

Initial research into stakeholder sentiment suggested that local residents would oppose a national chain occupying a retail unit in a location which was largely dominated by local traders.

Having communicated the purpose of the development effectively, correcting misapprehensions and framing the development proposal in a planning context, BSP unearthed substantial levels of support for the proposal.

Two public exhibitions were held. Representatives from BSP, Latham Architects and the Co-operative were in attendance to discuss proposals, concept and design and answer questions posed by the public and feedback sheets were available. Comments were collected in a suggestion box so that responses could be made in confidence. BSP also hosted a dedicated website page where comments could also be submitted in confidence.

From BSP’s knowledge of the area and initial research, it was anticipated that there might be some negativity in regard to the relocation of the Post Office. From discussions at the consultation event, BSP and other team members were able to discuss the concerns with local residents. Although rumours regarding the relocation of the Post Office circulated, BSP was able to communicate the facts to local residents and the Town Council, which allayed fears.

While some residents responded negatively in regard to the design of the scheme, these comments were taken on board and the design revised before the submission of the planning application.

The planning application was submitted 28 March 2014 and was successfully granted planning permission on 4 June 2014.

**Box 18. 7**

**Case study: overcoming negative reactions**

**Sainsbury’s Local - Whiteladies Road, Bristol**

Sainsbury’s took over the lease of a former Woolworths store in summer 2011. Since Woolworths closed, the building had been occupied by tenants, creating an indoor market style environment. The site location was very suitable for a Sainsbury’s Local as it is in the heart of a thriving community, with local restaurants, pubs and shops all within walking distance of nearby residential areas and student halls of residence.

The announcement, however, came shortly after the opening of a similar convenience offering by another food retailer in nearby Stokes Croft. This had caused widespread discontent among the local community which is very active in support of independent retailers.

Given this volatile backdrop, the Sainsbury’s announcement attracted significant media interest, in particular from the local BBC which used it as a platform for a piece on the proliferation of convenience stores in the Clifton area in the wake of the Stokes Croft row. In addition, a very active group of local campaigners called a public meeting to specifically discuss the possible impact on independent traders. This group chose not to accept a meeting with Sainsbury’s to discuss their concerns.

Sainsbury’s took a proactive approach from the outset to ensure early dialogue on the proposals with key stakeholders, to understand concerns and provide information on the store. Briefings were held with local ward councillors at which issues such as deliveries, licensing hours, disposal of commercial waste and sustainability credentials were addressed. A number of concessions were made in response to their desire for the shop to be integrated into the local retail community, for example, having an open shop front to generate a sense of being part of the community and the avoidance of ‘A’ boards on the narrow pavement. The opening of the store was also seen by them as an opportunity to revitalise a dormant traders’ association and it was agreed that the store manager would progress support for this once the shop was open and trading.

Letters were mailed to all residents and businesses within a quarter mile radius of the proposed store which resulted in a number of employment enquiries from local people.

The planning application for the store was approved and the store opened in autumn 2011. The recruitment drive attracted a significant response and many local young people and students took up employment opportunities in the store.

The purpose of a genuine, two-way public consultation in communications terms is not to unearth positive attitudes towards a proposal, but to gain maximum local involvement and hear all points of view. Negative opinion is therefore inevitable: in fact a public consultation which reveals 100% in favour of a scheme is likely to be unconvincing, much as it may seem desirable.

# Disappointing results

Consultation results may disappoint local residents for a variety of reasons, but this of particular concern when there is a disparity between resident sentiment and consultation findings or when the consultation has not been publicised adequately or opportunities for involvement are limited. Disappointment can fuel negativity – sometimes online, sometimes in the local media – and in the case of a developer’s planning application, may well coincide with the point at which the planning application is being consulted upon by the local authority or considered by the planning committee. At this stage it is generally too late for developers to adapt proposals in the light of constructive comment, and faced with possible criticism at a planning committee, the options are to withdraw and amend the application or risk it being refused.

Appropriate research and planning provides a good basis for consultation and when this is done well local residents will be involved to an appropriate level and should not have grounds to object to the form of consultation. Importantly, reference to the consultation mandate will enable the development team to negate criticisms of the process.

When effectively monitored, concerns about specific development proposals will be identified at an early stage, enabling responses to be addressed while the consultation is still live.

# Managing expectations

The potential for a substantial new facility impacting on their lives and a commitment on behalf of its sponsor to consult widely can raise expectations among local residents. If not met, high expectations can lead to criticism of the process and negativity towards the proposal.

Pre-consultation can enable a developer to discuss the remit and nature of the consultation with the local authority, special interest groups and in some cases, residents, at an early stage. Where a gulf exists between expectations and reality, this should become immediately apparent and can be addressed. Often the solution need not be to offer more by way of consultation, but to consult in a way which is more suitable to the specific community.

The process of consultation should be clarified in the consultation mandate and this document made widely available to ensure that those participating understand the remit of the consultation.

A keen interest – and particularly a positive one – can be welcome news but the consultation team should be conscious of over-promising and ultimately disappointing. Tactics should balance the need to motivate residents to secure their involvement, with tactics which will produce an appropriate level of feedback and a deliverable scheme. Sometimes the involvement of a ‘middle-man’ as described earlier, whether in the form of a local authority officer (in the case of a privately led planning application), consultation manager or community arts worker, can help manage expectations.

As ever, the evaluation of the consultation will be helpful in justifying the applicant’s actions: where a specific consultation framework has been put in place using pre-consultation dialogue and research, accepted by planners and run according to the consultation mandate, local authorities will understand that the consultation has met its objectives, despite any opposing voices.

# Apathy and consultation fatigue

To many applicants, the prospect of an over-vociferous local audience would be very welcome: today, audiences pestered on a regular basis for customer relations feedback are more likely to ignore a consultation. Consultation fatigue is rife even among the most engaged of audiences: in researching this book a number of planning consultants and developers interviewed admitted that they didn’t always respond to consultations on development proposals in their own neighbourhood!

The issue seems to be particularly common among community and voluntary organisations which lack the resources to respond as thoroughly as they may wish. As described in Chapter 4, a range of factors can cause apathy. It is prominent in areas in which there is substantial change and therefore numerous demands on residents’ time by developers, and can also result from local residents having been consulted previously but receiving little feedback or seeing no change as a result of their efforts; or where a planning application which received considerable local objection was consented at appeal. As mentioned previously, inadequate consultations on Local Plans can also cause local residents to resent the planning / political system.

A common problem is that those with an objection to a scheme are far more likely to take part in a consultation than the ‘silent majority’. Anger and fear are excellent motivators; a general acceptance of a project less so.

Although apathy cannot always be attributed to latent support, a case for this argument can be made in the instance of a well-publicised and run consultation which meets objectives agreed in advance with the planning authority.

## Using the strategic approach to conquer apathy

While it is very difficult to know how proposals are likely to be received, those consulting should be wary that an inadequate approach could invalidate a consultation and pre-consultation dialogue should be used to identify the most appropriate methods of consultation.

The consultation mandate can reassure potential users of the quality of consultation, including a commitment to be open, honest and thorough and to use the results constructively.

The research stage should not end when the consultation strategy is in place, as the developer can continue to learn about the community throughout the consultation. If using online consultation, for example, it is extremely useful to use a tool such as Google Analytics to understand how people are interacting with a website: at what times of day they are most likely to comment, which pages they favour, and very importantly, which page most often leads to them leaving the website.

Presentation is very important in gaining traction for a consultation. A consultation should appear to welcome engagement and public relations has an important role to play here, yet very few consultations are designed to appeal to residents in the way that, say, advertising would.

Timing is also important. Just as the best time to put a house on the market is late spring or early autumn, this too is the best time to consult, and for the same reasons: there are no major holidays , the weather is unlikely to pose a problem, and the long days allow people to venture outside in the evenings. Local authorities should be mindful of consultations being run simultaneously and possibly generating confusion. Often local authorities have an online diary of consultations which prevents clashes from occurring.

A commitment to accessibility, discussed later in this chapter, and the possible use of a ‘middle-man’ as mentioned earlier are also important in preventing apathy.

In some cases, such as on a residential scheme, it is simply not possible to engage with future users and it can be beneficial to create a representative audience. Developing thematic or geographic panels of people or representatives can also be constructive.

It goes without saying that inspiring people with engaging and meaningful tactics is one of the best means of countering apathy. Keeping in touch following their initial involvement, thanking those who have taken part, and updating them throughout the process is likely to encourage further support. In some cases new issues can be introduced during a consultation to prevent the topic from becoming stale, although it is important not to confuse the original aims and objectives nor to introduce new ideas without giving those who have already responded an opportunity to comment.

Care should be taken to ensure that local residents’ expectations are not unrealistic: it is better that many people participate to some degree than a small handful participate to a greater degree. And while high attendance figures at a planning weekend is a considerable achievement, it is also worth providing a means by which the ‘time-poor’ are able to take part.

Because of its accessibility, online consultation provides an opportunity to gain the voice of the silent majority or, where this is not forthcoming, gain some knowledge of their position on an issue in the absence of direct engagement: if ten angry people attend a meeting, it is impossible to know whether the remaining local population supports or opposes the proposals, or is even aware of them. But if ten angry people comment in an online forum and data reveals that 10,000 others visited the site, downloaded relevant documents, watched the videos but chose not to comment, then it is possible to deduce that the anger of ten individuals is not necessarily representative of the entire community.

Finally, it is worth considering that apathy can be on the part of the resident, local authority or developer: a successful consultation requires all parties to be enthusiastically involved. The cause of consultation fatigue may well lie within the development industry, resulting from ineffective consultations which fail to deliver meaningful results. The industry as a whole has an obligation – and an opportunity – to overcome this.

# Hard to reach groups

As earlier chapters have shown, the need to involve ‘hard to reach’ groups is perhaps the most enduring issue in consultation. That said, the definition of those classified as hard to reach is changing.

Previously the elderly, disabled, black and minority ethnic (BME) and women were singled out as requiring additional outreach support. Today, older age groups and women may be among those most likely to respond to a consultation but issues still remain: whereas the 65-75 age group is very likely to contribute to a consultation, the very elderly remain unrepresented; and whereas women are now much more likely to engage in consultations independently of their husbands than 50 years ago, parents of young children are hard to reach due to time pressures and the practical difficulties of attending evening events. Recent entrants to the list of hard to reach are those who work, particularly commuters.

And while accessibility for commuters has been very successfully addressed through online consultation, requiring people to use IT to respond to a consultation - perhaps to be more proactive in finding the information, to be expected to do so via online networks, to comprehend information on screen and type responses - has accessibility issues in itself.

Pre-consultation research and dialogue can assist by enabling a real understanding of a local community. It can help create a picture of those groups most likely to be affected by the proposed changes and then identify those most relevant to the consultation. Local authorities consulting on strategic planning will have equalities agendas that they must comply with. Policies will recognise that different sections of the community, particularly minorities, have specific needs which should, as a democratic right, be recognised. Failure to take account of people’s differences could result (particularly in the case of public bodies) in claims of indirect discrimination.

For developers, particularly those in the private sector, there are considerable benefits in reaching out to specific groups. Discussions with the local authority at pre-consultation stages should identify the ways in which the consultation may be made representative of the wider community.

It goes without saying that it requires a greater investment of time and other resources to work with those groups identified as hard to reach. Early dialogue should be used to ensure that issues can be identified prior to the consultation strategy being put in place and therefore to ensure that these groups’ interests are considered throughout.

It is important never to treat hard to reach groups as an undifferentiated mass: each of those groups identified above (and the people who constitute them) have individual interests and needs. A consultation should have a clear understanding of those groups it needs to reach and invest time in understanding them. This might include knowing where specific groups congregate, the communication channels that they use and the issues that concern them. It is always very helpful to identify the leaders – both formal and informal – with a view to establishing initial contact through a representative. Local authorities are well placed to advise on specific groups, and in many cases can provide or make recommendations regarding translations, interpreters, and advise on physical accessibility. For long term consultations it is often prudent to employ or train a member of staff with responsibility for specific groups.

A consultor should consider whether processes are too restrictive. For example, some consultations will only accept responses made in writing or those made at a specific event. Again at the early stages, the various ways in which responses can be elicited should be considered – always ensuring consistency with the consultation’s objectives and the ability to analyse and evaluate responses, and to maintain consistency throughout the process. The consultation mandate should stipulate that the principles guiding the consultation will include those of openness and accessibility, and the consultation should reflect this commitment throughout.

**Box 18. 8**

**Reaching BME groups**

* Gain an understanding of the various ethnic groups within the community at an early stage
* Identify issues that concern BME communities and make the consultation relevant to them
* Explore the opportunities for training on racial awareness to help challenge stereotyping, perceptions and assumptions
* Aim to engage with BME communities by taking advantage of existing social networks, community groups, and trusted advocates and use online consultation to support, rather than replace, face-to-face interaction
* Build the leadership capacity of those who have an active interest and encourage them to use their contacts to grow the network
* Recruit BME residents onto stakeholder engagement groups
* Consider the need for translation of leaflets and the use of translators / facilitators at meetings
* Consider dietary requirements
* Avoid holding events in venues where alcohol is consumed
* Ensure that engagement does not clash with faith days
* When creating a consultation website, consider images / signs which will benefit those who do not have English as a first language, but bear in mind that not all icons and symbols translate across cultural boundaries
* Where a language other than English is widely spoken in a particular community, consider providing translations on the website – but plan how the development team will interact with those communicating in another language via online forums
* Evaluate success by asking for feedback

**Box 18. 9**

**Reaching younger people**

* Avoid patronising young people
* Remember that you may have to overcome suspicion or mistrust among younger audiences. Invest time in building a relationship and demonstrate a genuine desire to hear the views of young people. Where possible, involve young people in steering the consultation, making it a consultation by young people, for young people
* Consider targeting specific sub-groups based on age, ability and interest
* Investigate any existing consultative forums for young people
* Consider going to a young persons’ group rather than expecting them to attend events run by the consultation team
* Work with schools and colleges, perhaps addressing an assembly, running a competition or offering a site visit
* Ensure that events are accessible via public transport and consider covering travel costs
* Embrace new technologies such as consultation websites, text voting and apps, perhaps including young people in their design
* Avoid a formal approach to events and aim to make the consultation engaging through using ‘ice-breaking’ games, providing refreshments and allowing ample opportunities for people to socialise
* Bring young people into the consultation by engaging them on relevant issues such as education and housing and use this as a means to involve them on more general topics
* Be aware of adults’ potentially negative attitudes towards young people which may assume lack of experience, ignorance, difficult attitudes, and a lack of interest or respect
* Evaluate success by asking for feedback

**Box 18. 10**

**Case study: engaging with young people**

**Argent (Kings Cross) Ltd and Fluid Design – Kings Cross, London**

Developers Argent (Kings Cross) Ltd worked with Fluid Design to carry out a consultation with children and young people through their schools and youth groups.

Kings Cross was known to attract young people and levels of youth crime were high in the area. Fluid approached the task as an early opportunity to tackle issues in the neighbourhood as well as to ensure that the voices of young people were taken into account.

Wide-ranging tactics were selected to address the diverse audience. These included:

* Creating a mind map
* Hot spot exercises whereby maps and cartoons were used to illustrate ideas
* Requesting that consultees complete canvas cards – A5 sized cards which included a Polaroid photograph alongside a single most important like, dislike and question. Canvas cards were displayed in prominent locations and the issues raised on the cards prompted others to complete them.
* A Youth Parliament, run by Camden Council
* Art houses, at which young people were encouraged to either complete homework or create an artwork
* An interactive matrix which allowed comments to be viewed by contributor (using a photograph) or by issue
* Video vox pops

Fluid selected attractive and interesting venues, including the St Pancras hotel and a canal boat (complete with DJ) on the Grand Union Canal as a means of encouraging young people to attend events.

The ideas generated by young people substantially impacted upon the development proposals, leading among other things to increased permeance east-west through the site, the retention of three gas holders on site and the creation of a fourth.

**Box 18. 11**

**Reaching older people**

* Seek advice from older people on appropriate channels of communication and venues
* Carry out an accessibility audit of all consultation tactics
* Promote the consultation through libraries, post offices, churches, surgeries, hospital waiting rooms and/or bus operators to display information
* Avoid making ageist assumptions about older people and the amount of experience and expertise they may or may not have
* Be aware of any particular barriers to communication, such as language, hearing or dementia
* Ensure speakers can be heard clearly – microphones should include the hearing loop system
* Ensure that older people are represented in any stakeholder groups
* Consider that jargon and acronyms can have a disempowering impact on older people
* Ensure that print, format and content of documents is accessible
* Speak directly to the older person rather than their carer or companion
* Evaluate success by asking for feedback

**Box 18. 12**

**Case study: involving elderly people in community development**

**PB Planning / Barratt Homes – Pontefract**

PB Planning was appointed by Barratt Homes to consult with local people in Pontefract on proposals to deliver new homes on the edge of the settlement area.

Initial research revealed that a large proportion of local residents were elderly and many would be unable to attend traditional consultation events easily. Consequently a large proportion of the consultation was house visits: PB Planning sent letters to all residents, with the phone number and email address of the planning consultant. A series of days was allocated for the purpose and then visits booked with local residents.

The reception was very positive: local people appreciated the one-to-one contact, they were given time to understand the proposals and the impact of the proposals on their local community and were generally very supportive of the planning application.

**Box 18. 13**

**Online consultation and accessibility**

* Design a well-defined, clear focus with minimal and intuitive navigation steps
* Ensure that websites are accessible with directional controllers such as D-pads, trackballs or keyboard arrows
* Allow functionality via the keyboard, rather than relying on the mouse, enabling those who use assistive technologies to access the website
* Avoid controls that change function. If these are necessary, ensure that the content descriptions are changed appropriately
* Make it easier for users to see and hear content by separating foreground from background
* Ensure that web pages appear and operate in predictable ways
* Ensure that buttons and selectable areas are of sufficient size for users to touch them easily
* Provide time for content to be read and understood
* Avoid having user interface controls that fade out or disappear after a certain amount of time
* Bear in mind that HTML is quicker, easier and more widely accessible than PDF
* Consider common forms of colour-blindness when determining colour palettes
* Ensure that text size can be increased without detriment to layout or meaning
* Ensure that the website is usable by commonly used screen readers such as JAWS, NVDA, VoiceOver for OS X, Window Eyes and Supernova and basic operating system screen magnifiers such as ZoomText and MAGic
* Ensure that the website is compatible with speech recognition software such as Dragon Naturally Speaking
* Provide content descriptions for user interface components that do not have visible text, particularly ImageButton, ImageView and CheckBox components
* Use *alt text* for important images such as diagrams and timelines, enabling those who use a screen reader to understand the images
* Where possible include standard interface controls in designs rather than custom built controls
* Provide a text transcript of audio or visual files for people who are deaf or hard of hearing
* Evaluate success by asking for feedback

The important consideration of engaging with specific groups has been covered only very briefly here, partly because the principle of accessibility should be considered at all levels of a consultation and as such is covered elsewhere in this book. There are also many other resources online and in print which address the needs of specific groups, many of which can be found in the Further Reading section.

**Box 18. 14**

**Case study: marginalised, hard to reach groups and wider outreach**

**National Grid**

National Grid is committed to ensuring that consultation processes and associated communications are made as accessible to as many parts of the community as possible. It recognises that there are individuals, groups and communities within the areas of consultation with barriers which could prevent them from fully taking part in the process.

In developing strategies to support non-statutory pre-application consultation National Grid seeks to work with officers at relevant local authorities to identify how best to ensure consultation is inclusive and that the most appropriate methods and techniques for engaging with marginalised and hard to reach groups in their respective areas are used. National Grid uses this information, feedback received from the project to date and further research to create a list of the groups.

These groups often include:

1. **Geographically isolated communities:** the geography of the area that National Grid consults in is **predominantly** rural. Disadvantaged communities tend to lie in isolated geographical pockets. This makes it difficult for people living there to engage without access to public or private transport.
2. **Economically inactive individuals and socially deprived communities:** while individuals living in these communities may have only limited access to the internet, there is a high percentage of mobile phone ownership. Text messaging services may therefore present an alternative to email.
3. **Young people:** in addition to using social media National Grid seeks to engage young people by making online and offline consultation more visual and interactive to reduce reliance on reading and writing.
4. **Older people:** National Grid recognises that there may be older people who have health issues or who are housebound. Those receiving domiciliary care, or in nursing homes generally, require a high level of care which makes it hard for them to attend events.
5. **Disabled people and those with learning difficulties:** this encompasses a wide range of needs and access issues, requiring a combination of consultation methods and information formats to ensure inclusion.
6. **Ethnic minorities:** ethnic groups, and their cultural and language requirements, need careful consideration.
7. **Holiday home owners, tourists and visitors:** while these are an important and distinct group, their transient nature can make them particularly hard to reach.
8. **Time poor busy working people:** working people, particularly those who have to travel away from the area or work shifts are a hard to reach group. It is important to identify those major employers whose workforce travels from across the local area and the surrounding regions to work in a central location, and where possible, seek to identify internal communication channels specific to these employers which the project team could tap into.

In engaging with these hard to reach/marginalised groups, National Grid understands that there are a range of organisations which act as a gateway to reaching groups with wider interests. These include those groups and organisations involved in disabled assistance, elderly care/support or promoting the interests of younger people.

Prior to launching the consultation National Grid will contact these organisations to seek their advice on how best to reach those they represent. Based on their advice National Grid will undertake specific activities (such as briefings or events) or make information available that best meets the needs of those they represent.

Appropriate activities include:

* Maximising the use of existing methods and networks with which people are already engaged
* Consideration of requests for consultation material in different languages and formats (such as large print or audio), and making them available where appropriate
* Delivering tailored presentations to representative forums and organisations to raise awareness of proposals, and increase awareness and understanding of the consultation process
* Attending events that specifically target identified groups
* Using online and offline channels that specifically target the identified groups, such as community and sector-specific newsletters and websites
* Consideration of the best way to establish dialogue with appropriate target groups through online media
* Ensuring that a reasonable proportion of consultation exhibitions are held in venues visited by target groups
* Providing briefings and updates for relevant support agencies on the project, the consultation process and how to participate so that they are confident and able to inform and advise service users about our consultation and possible impact of the proposals
* Targeting holiday parks and second homes with tailored information to encourage seasonal visitors to register to receive project information at their home address
* Ensuring distribution of information materials, such as project newsletters and advertisements, covers grassroots locations and community groups
* Maintaining a dialogue with organisations representing and working with the identified target groups to monitor and review the inclusivity of our consultation activity
* Siting events in locations convenient to main employment hubs to target time poor.

**Box 18. 15**

**Case study: maximising inclusion strategy**

**Atkins Global – Horizon Nuclear Plant, Anglesey**

In its substantial consultation on the Horizon Nuclear Power project (Wylfa Newydd) , Atkins Global put in place Maximising Inclusion Strategy to ensure that the consultation engaged effectively with the diverse communities on Anglesey particularly those who traditionally do not, or find it difficult to, respond to formal consultations. The planning application is an NSIP and as such the strategy sits alongside the Statement of Community Consultation (SOCC).

The key target groups for the Maximising Inclusion Strategy were identified as:

* Young people
* Older people
* Economically inactive people
* Socially deprived communities
* Disabled people and people with learning difficulties
* Minority ethnic groups
* Groups representing religions and other beliefs
* Lesbian, gay, bisexual and transgender community
* Holiday home owners.

The groups were selected in close collaboration with the Isle of Anglesey County Council. Initial meetings were held with the Council’s Economic Development Department and Corporate Policy Group to seek advice on the types of groups that should be targeted and the best ways to reach them. A comprehensive list of ‘gatekeepers’ – i.e. organisations and individuals working with and/or representing the target groups – was created.

Meetings were held with a number of gatekeeper organisations to seek advice on how Horizon might be able to utilise existing knowledge, networks and communication channels to raise awareness of its consultation within communities on Anglesey. These meetings were the first step in establishing lasting links and relationships with groups who actively support marginalised, disadvantaged or disengaged communities and individuals.

Horizon met with and sought advice from the following representative individuals/organisations:

* A project aimed at creating a culture of enterprise among young people and promoting local career and business opportunities
* An independent agency providing support and advice to voluntary and community groups
* Community Voice
* Jobcentre Plus
* Môn CF (previously Communities First)
* Social Services
* Stonewall Cymru
* The Citizens Advice Bureau
* The Council’s Policy and Strategy Unit
* The Federation of Young Farmers Clubs
* The local disability forum
* The North Wales Police Diversity Officer
* The North Wales Regional Equality Network (NWREN)
* The Older People’s Strategy Officer
* The Regional Community Cohesion Coordinator
* The Youth Service
* Young people’s forums

The meetings held with ‘gatekeeper’ organisations highlighted a number of key considerations and challenges which Horizon will take into account when planning its consultation programme:

* Getting young people interested is particularly challenging, and any efforts to consult with them must be interactive, relevant and fun, involving less reading and writing than for adults. Online activities (including social media) are increasingly becoming the most effective way to communicate and raise awareness with young people.
* Many active and mobile older people get involved with activities run under the Council’s Older People’s Strategy and Agewell initiative. However there are many other older people who have health problems and who are housebound. Those receiving domiciliary care or who are in nursing homes generally have a high level of need and therefore it is harder for them to access consultation events.
* Around 36% of people on Anglesey are economically inactive, and there is a high level of illiteracy among adults. Furthermore, many people on Anglesey are not online. Consultation methods involving reading and writing, or requiring internet access, may therefore exclude some parts of the community. Support and guidance should be provided to assist participation.
* 2% of Isle of Anglesey’s areas fall within the 10% most socially deprived in Wales, as identified by the Welsh Index of Multiple Deprivation 2011. These communities are often self-contained and disengaged.
* The term ‘disabled’ encompasses a vast range of needs and access issues; this group is the least homogeneous and will call for a combination of methods and information formats in order to ensure full inclusion of people with different mental and physical disabilities.
* Holiday home owners are an important group in that they spend a lot of time on Anglesey and are likely to be impacted in some way by Horizon’s proposals, but they are difficult to locate and therefore particularly hard to reach.
* Whilst 98% of people on Anglesey are from a white ethnic background (almost all of whom are also identified as British), according to 2011 Census figures, the number of people from minority ethnic groups is likely to increase due to migration trends. Those from minority ethnic backgrounds are often hidden in society and identifying cultural and language needs requires careful consideration.

Following the initial research, Horizon put in place a detailed programme of activities which specifically aimed to promote awareness of its consultation amongst potentially marginalised and excluded groups. Broadly, this involved:

* Maximising the use of existing communication methods and networks with which people are already engaged, using online and offline communication channels which specifically target the identified groups (e.g. community and sector-specific newsletters, websites).
* Ensuring that all non-technical documents are bilingual (Welsh and English) and considering requests for consultation materials in different languages and formats, and making them available where appropriate.
* Delivering tailored presentations to representative forums and organisations to raise awareness of Horizon’s proposals, increase understanding of, and encourage participation in, its consultation process.
* Attending events which specifically target the identified groups.
* Considering how best to establish dialogue with appropriate target groups through online media.
* Ensuring that a reasonable proportion of consultation exhibitions and drop-in surgeries are held in venues visited by target groups.
* Where appropriate, minimising the use of technical language and jargon in written consultation materials to ensure that basic messages reach all audiences regardless of age and literacy levels.
* Providing briefings and updates for relevant support agencies on the proposals, the consultation process and how to participate so that they are confident and able to inform and advise service users about the Horizon consultation and possible impacts of the development.
* Targeting holiday parks/second homes with tailored information to encourage seasonal visitors to sign up for future information about the consultation at their home address.
* Providing a staffed, dual language (English and Welsh) telephone helpline to deal with any queries about the project and the consultation process and give guidance on submitting feedback.
* Ensuring distribution of information materials (e.g. Horizon newsletter) and consultation advertisements covers grassroots locations and community groups.
* Ensuring that consultation venues are fully accessible, and that events are held in locations which are regularly attended by marginalised groups - including people in rural communities.
* Maintaining an ongoing dialogue with organisations representing and working with the identified target groups to monitor and review the inclusivity of engagement and consultation efforts.

# Online consultation and perceived risk

This chapter has so far identified external issues which may affect the smooth running of a consultation. Concerns about online consultation which then threaten the effective use of this powerful tactic however, is one which may exist in the consultation team itself.

Online consultation is relatively new and a fear of the unknown persists despite many success stories. As Chapter 16 identified, the consultation scene was altered radically with the introduction of online consultation impacting on the share of power, the geographic spread and a new set of consultation tactics. Online consultation has brought about numerous benefits - engaging tactics, increased accessibility and thorough reporting to name but a few - but those running consultations frequently worry that the consultation will be hijacked by trolls, that the website will be open to corruption, and that registration will be off-putting.

Online, a ‘troll’ is an entity which takes part in discussions purely to disturb other users. Potentially a troll can anger people, disrupt the flow of debate/discussion and use abusive language. Anyone who has run a consultation will know that this behaviour operates both on and offline. Online, there can be effective means of dealing with trolls. However, it is extremely important to identify this as either as anti-social behaviour or merely an impassioned and negative response to the consultation: unpalatable though it may be, the latter should not be dismissed, as everyone is entitled to put forward their views on the subject being discussed. However, activities which are clearly anti-social and unconstructive can be stopped if the consultation mandate set out the basis upon which people are invited to respond and specific rules and regulations in relation to harassment, bullying and bad language are put in place (perhaps contained within a user guide[[4]](#endnote-4)). Software can be used to identify bad language and ‘spam’ and is advised, in conjunction with monitoring. Where necessary, posts can be removed with immediate effect, IP addresses banned and usernames invalidated. Where a local issue has potential to escalate into a national issue and draw response from across the globe, mechanisms can be implemented to allow only those within a specific postcode area to register to take part in online forums, and where necessary the electoral register can be used to check the veracity of identities given. Where the consulting body has control of the website on which such activity occurs, preventative action can be almost too easy: it should only be used when absolutely necessary.

With hacking, phishing and spam affecting our daily lives, it is unsurprising that issues of cyber security concern those running consultations. Certainly an unprotected website can leave itself open to abuse and where user details are being collated via an online database the legal and reputational impact can be considerable. However, all websites can benefit from EV (Extended Validation) SSL (Secure Sockets Layer) certificates. Websites with this functionality display a padlock icon and the https (Hyper Text Transfer Protocol Secure), rather than simply http (Hyper Text Transfer Protocol) in the URL. This means that all communications – including user names and passwords - between the browser and the website are encrypted and only accessible by the website owner.

As mentioned previously, registration can be extremely beneficial in restricting consultation responses to a specific locality and understanding more about those taking part. However, those running the consultation should also consider the downsides of registration: potential users may be reluctant to pass on email addresses, passwords and other personal data, and may be put off by the amount of time (perceived or otherwise) that registration demands. Consultation websites should seek to make the process simple and reassuring, explaining the need for registration, referring as appropriate to the security measures in place and making the process as smooth and simple as possible. Typically a consultation website will require a name, postcode, username and password. Any other information, such as a full postal address or demographic data (age, employment or marital status) should be given voluntarily and it is advisable to request this data at a later stage, allowing the user to have built up trust and respect for the consultation and appreciate the benefit to the consultation in supplying such data.

Understandably tactics as new and as powerful as online consultation can raise concerns. But by far the greatest risk in online consultation is not connected to the consultation website itself but the absence of it: failure to provide a platform by which local residents can discuss a proposed development online can result in the developer being unaware of other online discussions, which can then gather momentum and perhaps only come to light when it is too late to address concerns or misapprehensions.

## Negative media involvement

There is an assumption that the media, specifically local newspapers, are naturally anti-development, that a newspaper will always champion the voice of the local resident over that of a corporate entity, and that bad news is more likely to make the headlines than good news. There is some truth in this, but this does not justify developers failing to engage with journalists.

As with local residents, positive relationships with the media are based on provision of information and a positive, open and transparent approach.

A shocking proportion of developers opt not to communicate with the local media in the early stages of consultation, entering into dialogue only (and often reluctantly) when a negative issue has been brought to the attention of the media. Frequently a negative, unbalanced and perhaps inaccurate story will have been published by this stage, causing substantial damage both to the consultation and the reputation of its partners more generally.

The recommended approach is to contact the local newspaper at the early stages of the consultation: use the consultation mandate to explain the process and remit of the consultation, ensure that the local media is fully furnished with the facts and the positive messages and has contact details for an appropriate individual in the case of future questions. The result of this approach is typically a positive story in the first instance, and a more balanced story should local residents approach the newspaper with concerns about the consultation or development proposals. The local newspaper can also be used to publicise consultation events both in print and online.

**Box 18. 16**

**Case study: positive media relations**

**Bayfordbury Estates - Brookfield Riverside, Hertfordshire**

Brookfield Riverside was one of the first schemes to use social media in consultation, using TTA Group (part of Chime plc) and later PNPR.

In 2008, Bayfordbury Estates consulted local residents on the outline proposals for Brookfield Riverside, a mixed use, predominately retail scheme. It did so through a variety of methods and chose to use Facebook as a means to reach young people and commuters.

The first person to engage on what was possibly the first Facebook page for a planning application was a journalist from the local newspaper, Gemma Gardner. Gemma was invited to Bayfordbury Estates’ offices and shown the Facebook page at the point when it went live. She then became the first person to post on the Facebook page, marking what continued to be a very constructive relationship between the developer and the local media.

Commenting on the initiative, Gemma said, ‘I was pleased to be shown the Facebook page and to use it at an early stage in the consultation. At that time using social media to engage with the public was rare locally. I was impressed by the lengths that the developer went to in reaching out to local people at the start of their bid and I was in touch with the developer throughout the planning process, which I believe benefited the local residents and the planning application.’

Albeit a one-way tactic, local media relations represents an excellent opportunity to communicate with a wide audience. And thanks to the proliferation of local newspaper websites (now more numerous than those newspapers producing a print version) this is changing: opportunities exist to drive readers to the consultation website, or to encourage discussion via a local newspaper blog or social media page and in doing so a once static, asymmetrical means of communication becomes an interactive tool.

# [Conclusion]

This chapter has addressed some of the most significant issues affecting today’s consultations. The enduring answer to these and other issues is the strategic approach to a consultation: with an appropriate level of pre-consultation dialogue, stakeholder research, situational analysis, a clear strategy communicated via a consultation mandate and an appropriate selection of tactics, issues can be mitigated.

There is no means of prescribing a risk-free consultation, because no such thing exists. A consultation which is open, transparent, accessible and two-way will encourage both positive and negative comment, as is expected. A good consultation is not one which is free of negative comment, but produces informed responses which are constructive in shaping future plans and are used accordingly.

1. An abbreviation for Not In My Back Yard, NIMBY is the pejorative term used to describe those who oppose a development because of its proximity and impact on their own home, even where they would recognise its value elsewhere, on grounds that are selfish and subjective. The authors of this book do not support the use of the term, believing that individuals have a right to express concern about a potential development and that the planning system is well placed to determine whether that view is a relevant planning consideration. [↑](#endnote-ref-1)
2. Rydin, Y (2011) The Purpose of Planning. Bristol: Policy Press. [↑](#endnote-ref-2)
3. CBI (2014) *Building Trust: making the public case for infrastructure* [↑](#endnote-ref-3)
4. A template User Guide is shown in Appendix 4 [↑](#endnote-ref-4)