

**Mr Jonathan Mercer**  
**Communications & Marketing Manager**  
**B&NES Council**

**25 January 2010**

Dear Jonathan,

## **IMPROVING B&NES CONSULTATIONS**

When we met on 19 January, I offered to write and summarise our concerns about the way that B&NES consults citizens. Although FoBRA represents residents, we believe that the business community and other sectors share our concerns. I'd be grateful if you could circulate this to your colleagues, so that they can all consider what we are saying.

As an ex public servant myself, I know how important consultation is. Government bodies need to find out what people think about problems and proposals, while those consulted need to get their views across. In an ideal world you would ask the right questions, we would give the right answers, and decisions would be improved as a result. If the consultation process does not work well, information will be patchy, decisions will be sub-optimal, and we shall all lose out.

From our discussion, I think that our concerns centre on what you would call major consultations. Similar principles may apply when consulting the people in Acacia Gardens about new traffic calming measures in their street, but we are looking at general consultations affecting a large part of Bath or B&NES.

The key principle is to put yourself in the place of the people being consulted:

- How do their processes work for agreeing responses?
- What information do you need to get from them?
- Therefore, what information do you need to provide?

Representative organisations like FoBRA need to consult their members, in our case 24 independent residents' associations. These groups attend our committee, which meets every two months. FoBRA office-holders can exceptionally take decisions on matters of urgency, but it is essential that we use this option sparingly. So if something is to be circulated to members and discussed in our committee, a **minimum of three months** notice is needed. B&NES is in the habit of allowing less than two months, and of taking little account of Christmas/New Year and the holiday season<sup>1</sup>. This causes unnecessary annoyance at our end, and means you will get a less well considered response.

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<sup>1</sup> Eg consultation on the draft economic strategy for B&NES. Circulated 18 December 2009 with deadline 29 January 2010.

I know that you will say that three months is not always available, if for example you are working within some framework external to B&NES. In that case, we think you could probably give advance notice that a consultation is expected. Could you make more effort to forecast **upcoming consultations in your online Calendar?** External groups may be able to prepare themselves to participate, given some notice.

There is an important judgement to be made about the amount of detail in consultation documents. If you consult people on a few key principles, you should be able to judge from the responses whether people think you are on the right lines and if not, what alternative direction they think you should take. This will enable you to go on fairly confidently to the next level of detail.

If you ask a large number of detailed questions<sup>2</sup>, consultees will concentrate on the ones of greatest interest to them. The number of responses on many points is likely to be limited, so you may not have enough response to inform your decision fully. But you will have a wide range of individual comments, which will be time-consuming to collate and analyse.

So to save us all time and trouble, we think you should aim for **short and straightforward consultation documents**. It may seem paradoxical, but a shorter document is likely to get a larger weight of useful responses than a long one. It goes without saying, though I will say it, that documents should be written in plain and clear English.

The **layout of consultation documents should be logical**. This means ensuring that the document leads the reader through the issues in a rational way, asking questions at the appropriate point and generally avoiding surprises and irrelevances. It needs to be easy to read.

**Consultations need to be advertised** wider than an entry in the consultation calendar on your website. FoBRA was not the only interested organisation that was unaware of the launch of the draft economic strategy. At the very minimum, we think there should be a Council news release.

The **consultation method needs to be tailored to the recipients**. The Council understandably tries to make widespread use of online questionnaires, yet these can be user-unfriendly. We suggest there should always be a paper alternative.

We suggest that the department responsible should hold a **briefing meeting** as each consultation is launched, so that interested organisations can grasp what you are actually looking for. We think this would be really helpful, and could save everyone a lot of time further down the line.

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<sup>2</sup> The Core Strategy spatial options consultation document ran to 180 pages and posed 60 separate questions.

We suggest that for general consultations you should draw up and **publish standard lists of consultees** on different issues. FoBRA would be happy to tell you the areas about which we should like to be consulted.

Overall, we think it would be useful for B&NES to publish **a statement of its consultation practice**. Although there are differences to the local authority situation, the Government code of practice on consultation<sup>3</sup> is a clear and helpful guide, which you could adapt. Once agreed, we hope that your staff will receive training in best practice.

Best wishes,

**Yours sincerely,**

**Henry Brown, Chairman**

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<sup>3</sup> <http://www.berr.gov.uk/files/file47158.pdf>