

# **Critique of the National Planning Framework 2 Consultation Process**

An independent evaluation from a community  
perspective

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## **Executive summary**

This report provides an independent evaluation of the National Planning Framework 2 (NPF2) consultation process from a community perspective. It assesses whether or not the NPF2 participation statement has been complied with and evaluates the consultation process against the 10 National Standards on Community Engagement. The report uses evidence obtained from a survey conducted with people involved in the process, written correspondence from the team carrying out the consultation and information from the NPF website.

The NPF2 consultation process being evaluated took place between Feb 2007 and April 2008.

The report acknowledges the hard work and willingness of the NPF team to manage the process and the professional manner with which it was conducted.

The evaluation concludes that the participation statement was not fully complied with. It concludes that three of the six main objectives stated in the participation statement were not met. It found the arrangements for participation were not transparent, there was no selection process of participants and there was poor representation of the general public during the process. There is scant evidence to demonstrate that representations were considered. The additional stated aim of reaching out beyond the constituency of organizations and individuals normally involved in planning consultations was not achieved and little seems to have been done to try to engage a wider range of public interest.

The consultation did not fulfill the requirements for the involvement standard. Although the team contacted community organizations and community councils as part of the process this was not part of a systematic process of selection and resulted in the inclusion of people with knowledge of the planning system rather than inclusion of people with an interest in the focus of the consultation.

Regarding the support standard, the process identified barriers to inclusion such as access to venues but did not recognize other barriers such as time constraints, work commitments and unfamiliarity with the topic matter. The fact that every public seminar was held during working hours resulted in a non inclusive process. In addition the passive approach taken to participation, rather than actively trying to include people meant the standard was not fulfilled.

The planning standard also fell short of requirements although it is recognized that this would be hard to achieve at a national scale. However the survey revealed a high degree of disempowerment from respondents, which could have been mitigated against by a more inclusive planning process.

The methods standard was partially fulfilled. The portfolio of methods used was successful at providing information and helping people to understand the issues. However

they were less effective at promoting discussion and encouraging people to work together towards solutions.

The information sharing standard fell short of requirements because the communication strategy was ineffective. There were examples of information being well communicated in documents but many contained jargon and were not written in accessible language.

The standard on working with others showed the professional and helpful nature of the Government team. Further progress could be made to use local channels to increase networks and strengthen relationships.

The improvement standard again demonstrated that this consultation was designed primarily to provide information rather than include people in decision making. Participants of the process described having increased their understanding of the planning system considerably, but skills such as consensus building and problem solving as well as increasing participants confidence need to be gained in order to fulfill the requirements of the improvement standard.

Finally the evaluation standard was insufficiently fulfilled largely because the monitoring mechanisms were not put in place, indicators and targets were not described and the evaluation carried out in the form of feedback forms was inadequate.

The conclusion is that a culture shift is still required in terms of consultation practice. The planning reforms emphasized the importance of promoting better public participation and yet this first and most important consultation since the Planning etc Scotland Act 2006 came into force falls woefully short of best practice.

This report asks that the consultation process be thoroughly reviewed and improved before the National Planning Framework is published. It also asks that further resources be put in place and training and guidance be given to all planning officers carrying out consultation processes.

## **Reason for this report**

Planning etc Scotland Act 2006 requires the Scottish Government to consult with the public on the National Planning Framework 2. Prior to doing this they are required to write a **participation statement** detailing the consultation process. The Act states:

*“Scottish Ministers are to prepare and publish an account (in this Part referred to as their “participation statement”) of when consultation as regards the preparation or review of the framework is likely to take place and with whom and of its likely form and of the steps to be taken to involve the public at large in the preparation or review<sup>1</sup>”*

Following the consultation process a report and a statement on how well the participation statement was adhered to must be laid before parliament during the 60 day parliamentary period. The Act states that:

*“a report as to the extent to which their actings with regard to consultation and the involvement of the public at large have conformed with (or have gone beyond the requirements of) their current participation statement”<sup>2</sup>*

There are currently no formal guidelines on how to set out a participation statement and what to include in the document on community engagement. The Scottish Government has considerable freedom on how to write its participation statement and indeed assess its own performance in complying with it. For these reasons it is essential to provide an external viewpoint to evaluate whether adequate efforts have been made to engage the public to provide the checks and balance necessary when the process relies on self evaluation.

The participation statement specifies that the NPF2 consultation process is in line with Planning Advice Note 81 (PAN 81) and the 10 National Standards of Community Engagement<sup>3</sup> (NSCE). The NSCE are standards that were developed by community organizations in Scotland as a tool to help improve the experience of participants involved in community engagement.

This report aims to evaluate objectively whether the national planning framework consultation process has been adequate by assessing whether the process conforms with the participation statement and whether or not the process adheres to National Standards of Community Engagement (NSCE). Importantly, it provides feedback and insight from an external perspective on the consultation process, since members of the community involved in the consultation process were asked how well they felt the process was conducted. It also uses information gained from the NPF website, and correspondence from the NPF team.

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<sup>1</sup> Planning Etc (Scotland) Act 2006, Part 1A, section 3A, para 10

<sup>2</sup> Planning etc Scotland Act 2006 Part 1A, section 3C, para 2a

<sup>3</sup> NSCE can be found on

[www.communitiesscotland.gov.uk/stellent/groups/public/documents/webpages/](http://www.communitiesscotland.gov.uk/stellent/groups/public/documents/webpages/)

### **Community Participation Survey Method**

To assess the participation process a sample of 20 individuals was randomly selected from the list of people attending the discussion conferences held between February and April 2008. Not all of the contact details were available and two individuals were unwilling to take part in the interview process resulting in eleven individuals being interviewed. Of these 4 had been to the Inverness event, 2 to the Glasgow, one to Aberdeen and two to the Edinburgh event. The individuals were selected from a list of attendees and contacted through email or by telephone and asked to complete a half hour interview.

The survey questions were designed to qualitatively evaluate the 10 National Standards of Community Engagement and assess whether or not the standards had been reached during the consultation events. Prior to these interviews a survey questionnaire was trialled.

One of the limitations of the survey was that the interviewees had attended the event some months prior to the interview. However, if this was the case, we sent details of the events and the minutes to remind the interviewees of the events and if requested respondents were sent the questionnaire in advance to allow them to reflect on their answers.

See Appendix 1 for questionnaire.

### **The NPF 2 Consultation Process 2007-2008**

The consultation process referred to in this report took place between February 2007 and April 2008, with an initial programme of events and activities including the distribution of an awareness raising leaflet, seminars on thematic issues, exhibitions and meetings with key agencies. This took place between February and November 2007. The second half of the process aimed to get feedback on the discussion draft of the NPF2 and included six discussion conferences, further meetings with key agencies and other bodies as well as displays at two events which took place between January and April 08. Throughout the process there was an advisory group providing expert advice on the content of the NPF2 draft and a communications strategy. There was also an additional source of advice through the NPF helpline and webpage.

## **Section 1**

### **Evaluation of the Participation Statement Objectives**

Paragraph 8 of the participation statement is entitled '*the Participation Commitment.*' In this section the objectives of the consultation process are set out. The objectives in the participation statement state that Government will *ensure* that

1. arrangements for participation are inclusive, open and transparent
2. the selection of participants is representative of the public, private, voluntary and academic, community sectors and of the various equality groups
3. information is provided early to allow full consideration
4. communication is provided through a range of formats and locations, including easily understood jargon free formats,
5. all representations are fully considered and
6. feedback is provided promptly on the conclusions drawn

Paragraph 9 of the participation statement specifies that a particular effort is being made to “reach out beyond the constituency of organizations normally involved in planning consultations to a wider range of public interests such as younger people, older people, ethnic minorities and people with disabilities”.

While the stated objectives are laudable aims for the public involvement in the preparation of NPF2, there is no explanation in the participation statement of how these objectives might be achieved, what the indicators and targets are or how they would be measured.

If the Government is to conduct a meaningful evaluation of the consultation process, then monitoring and baseline data is required throughout the consultation. In order to assess accurately whether or not the objectives were met, tracking mechanisms need to be identified and agreed by all parties and measurable targets set. In the interests of transparency and openness these need to be stated in the participation statement.

Paragraph 17 of the participation statement provides information on the NPF2 consultation monitoring and evaluation phase. It states that “monitoring and evaluating success is an important element of NPF2.” Yet the only type of the evaluation given is that it will consist of feedback through evaluation forms, which will be available at the regional events. Repeated assertions that “the team is committed to learning to improve the quality of future events,” “the team will strive to make improvements,” and “further suggestions are welcome” in the absence of any detail about the evaluation process, suggest a lack of rigour and expertise.

This fundamentally important issue is elaborated upon later in the discussion of how successfully NSCE 10 on Monitoring and Evaluation was achieved by the NPF consultation (page 21).

## **Objectives 1 and 2**

In order to prove that the arrangements for participation have been transparent, open or inclusive, evidence of a process needs to be demonstrated. The report asked whether (and if so, how) arrangements for participation were inclusive, open and transparent?

The Government stated that

*“For the events, delegates were self-selecting, to a number up to the venue capacity. ... Venues were chosen which were fully accessible for those with impaired mobility. Copies of information regarding NPF2 have been made available in different formats on request. Inclusivity and openness have thus been ensured by providing open access and by making information on NPF2 readily available”*

It appears that the Government interprets ‘inclusivity and openness’ as meaning that no-one was prevented from attending. However the reliance on self selection and the lack of an active process of engagement hardly embraces the spirit of participation. A more proactive approach would be achieved by describing a selection process, providing a list of those selected to participate and a detailed consideration of the best methods to use to engage the different groups. There is no definition of what a representative selection of participants would constitute and nothing that quantifies what proportion or amount of the population the Government’s planning department is attempting to reach.

The NPF team was asked “How did the Government attempt to achieve the selection of participants representative of the public, private, voluntary, academic, community sectors and of the various equality groups?” Their response was

*“The Government made no attempt at selection. Access to the consultation events was entirely open. This meant that participants were self-selecting”.*

The brevity of this reply speaks volumes about the Government’s current interpretation of community engagement.

For more detail about the lack of community representation in the consultation process please see standard 1 on page 10.

## **Objective 3**

The participation statement itself is a key piece of information that should allow people to assess when and where they can get involved in the consultation. Indeed the legislation states that ministers are required to prepare a participation statement specifying when consultation is likely to take place. This implies that the participation statement is to be written before the consultation takes place. However it was written and revised throughout the NPF2 consultation process (various updated versions were available on the website). A short document was originally produced, which expanded to eleven pages, much of which was written after the consultation events were held. In the original document written in Feb 2007 the meetings held in the first scoping stage were advertised but all were held in February. The second series scheduled in the autumn did not have dates, which would have enabled people to plan ahead. The events were subsequently



held the following year. This required people to keep abreast of a changing process and to keep an eye out for when events were actually going to occur.

Arguably public participation can be an iterative process in terms of trying different types of engagement to see what works. This does not excuse the fact that the statement should have set out what it was trying to achieve and how and when it was going to achieve it, in time for the public to consider it adequately. The constant redrafting gives the impression that the Scottish Government were not adequately prepared at the outset, thus making it difficult to provide information to the public about the process in time for it to be useful.

#### **Objective 4**

There was a range of documents and written communication available in different formats such as Braille. The written documents were of good quality and clearly written, but the information provided was aimed at those individuals and organizations already engaged with the planning process. There was no jargon free material which would have been useful for those not normally engaged in the planning process.

For more about information sharing including the communications strategy see NSCE 6 on page 17.

#### **Objective 5 and 6**

The consultation provided feedback to participants on the website and through a series of eight newsletters. Minutes of events were available on the website, but were not sent to participants. The newsletters were succinct and clear but did not reflect everyone's view point, tended to over summarise and lacked transparency. It was unclear as to how decisions about what to put in and what not to put in had been reached as none of the feedback stated how decisions were made, or how representations were or were not taken into account. Despite feedback mechanisms there is scant evidence to suggest that representations were fully considered.

For more detailed discussion please see NSCE standard 9 on feedback on page 20.

#### **Objective 7**

Paragraph 9 of the participation statement states that a particular effort is being made to “reach out beyond the constituency of organizations normally involved in planning consultations to a wider range of public interests such as younger people, older people, ethnic minorities and people with disabilities”. Despite this the participation statement fails to state how these target groups would be reached and what special efforts would be made to contact and engage them.

In written correspondence the planning team was asked what steps the Government took to reach beyond the constituency of organisations normally involved in planning? The response was “*The Government met with Black and Ethnic Minority Infrastructure Scotland (BEMIS) and the Youth Parliament. The flyer was circulated to all Scottish libraries. A video conference was held with ‘Locate in Scotland – Global Scots.’*” They

concluded that “*insofar as the Government did make contact with such organizations, encouraging participation, the objective was met*”.

To state that contacting two organizations, holding one video conference and making fliers available in libraries met the objective of ‘reaching out’ to those not usually involved in planning, betrays a complete ignorance of the effort that is needed to do such ‘reaching out.’

### **Conclusion**

The participation statement fails on three counts of good practice:

- A) It did not clarify the process in advance to promote public understanding of where and how they could participate;
- B) The participation statement was not advertised or published prior to the consultation but during the consultation process,
- C) It does not provide a clear basis for evaluating whether the Government did what it said would do;

There is little evidence to demonstrate that the objectives of the participation statement have been achieved. Objectives 1,2 and 5 and the additional assertion that particular effort was being made to reach out beyond the normal constituency are especially lacking.

## **Section 2**

### **Evaluation of the NPF2 consultation process using the Ten National Standards of Community Engagement**

This section assesses whether or not the consultation process achieved the Ten National Standards of Community Engagement.

#### **Did the NPF consultation achieve Standard 1 on Involvement?**

*Standard 1 states that people and organisations who have an interest in the focus of the consultation should be identified and involved.*

The consultation attracted a fair number of people to take part, although precise figures are not available as “numbers were not formally recorded” according to the Government. In view of the wide-ranging consequences of the NPF2 for many groups and communities there were two fundamental flaws. First (as already discussed) no effort was made to identify and reach those groups likely to be most affected by policies and national developments or those with information and opinions to contribute about the policies and developments. Secondly the process was weighted in favour of individuals, businesses and organizations with vested interests. If participation of individuals and organizations from all sectors representing all perspectives is to be achieved, it cannot be left to chance, or be dealt with by an apparently random selection of a handful of organizations. The process must be proactive and rigorous. To have been effective the process should have assessed the need to be engaged (ie identified stakeholders), planned how to engage them, and given particular focus to those not familiar with planning issues or up to date with current Government consultations. The fact this did not happen must be seen as critical failure in the process.

Considering the nature and scope of the national planning framework it is reasonable to assume that anyone in Scotland and arguably some outside Scotland could have an interest in the consultation. Therefore it is vital that all sections of society participate, yet despite this not all groups have the same level of awareness of the process and ability to get involved. Some will be well placed such as professional groups including businesses with vested interest in developments or local authority officers who will be responsible for the areas in which national developments occur. Equally important are the people directly affected by development: for example, commuters whose lives will be affected by a new road bridge, residents and businesses who will be affected by a commonwealth games facility or people living near a new airport runway. The challenge of the consultation process is to ensure that it considers all relevant parties and those affected have equal opportunity to take part and influence decisions. This consultation process did not live up to that challenge.

Despite weaknesses in the approach to inclusion, credit must be given for the contact made with community councils and other organizations. The number of meetings with key agencies also has to be credited to the team, who obviously put in a huge effort and

time to meet with such a large number. According to the participation statement a total of 57 meetings were held with 'key agencies' as part of the first stage scoping process. However most of the people engaged in this process were not the general public. Of the 57 meetings that were held the majority were with Government agencies, business representatives and quango's with only three that could be described as representing a community view point (Communities Scotland and Black and Ethnic Minority Infrastructure Scotland and the Scottish Youth Parliament).

A chart in the participation statement gives a breakdown of attendees to the 2007 regional seminars by local authority, Government agency, environment, transport, business and community groups represented. 64 of the 315 attendees were 'community' members. Unfortunately the numbers are inconsistent in the PS and an earlier paragraph states that only a total of 285 people actually took part. It is therefore hard to get a completely accurate picture of attendance. The representation of the discussion events held in 2008 showed that only 12% were from the community whereas 36% were from business/economy and 19% from local authorities.

The survey illustrated the point in that most of those chosen from a random sample of community representatives and individuals attending the discussion conferences had been involved in consultations before. Eight were members of community councils who were all familiar with planning issues, whilst two were members of a group that focused on a planning related campaign, one person had been made aware of the NPF by attending a planning course run by Friends of the Earth Scotland. None of those interviewed were from 'excluded or hard to reach'.

The survey asked attendees whether they felt that those who attended the meetings were representative. This was a purely subjective opinion of those who were attending, however it shows the impression that the respondents were left with. Of those that had an opinion 4 stated that there was a strong business representation, 6 felt there was not a good representation. One person stated that there was "no Joe Bloggs here as far as I could see", and that "the level of assumed knowledge was very high so it would have been hard for them to keep up" another stated that there was a "good mix" or that the representation was reasonable, although they went on to say that there was a "thin representation by community councils" and that the "impression was that there were quite a few professionals who came to the meeting as part of their jobs" Two felt that rural representation was poor and that there were more people from town and urban areas (one of these attended Inverness event the other Edinburgh event).

To fulfill the Government's own standards a far more rigorous process is required, one that demonstrates awareness of the range of stakeholders and their 'stake' in the NPF2 consultation. To achieve their own standard the Government should show a balanced, unbiased process of inclusion, not favouring people who already know about the planning system, who happen to be on a database of contacts, or who have a professional interest, but using a process that identifies who has an interest in the focus of the consultation and proactively seeking to engage them.

***Did the NPF consultation achieve Standard 2 on support?***

*NSCE 2 says that any barriers to involvement should be identified and overcome.*

The NSCE standards describe two types of barriers, the practical barriers such as access to venues and transport to events and the timings of events and the financial barriers. In this respect all of the events were held in appropriate locations and with appropriate facilities. Copies of information regarding NPF2 were available in different formats on request.

To achieve fairness and balance the consultation process needed to be weighted more in favour of those who are not familiar with planning system. This clearly has not been done. Barriers, such as unfamiliarity with the subject, time constraints and work commitments have not been recognized or addressed.

It is concerning that the Government stated that *“inclusivity and openness have thus been ensured by providing open access and by making information on NPF2 readily available”* This suggests a passive approach to participation, an approach which standard two is clearly designed to guard against.

The Government is suggesting that by merely not preventing people from attending that an open and inclusive way of operating a consultation process can be achieved. This does not take into account the fact an unbalanced playing field already exists between professional interest groups and people who are not familiar with the planning system. There is clearly an advantage to those who have networks and contacts, those who feel comfortable discussing planning issues of a strategic nature, over people for whom planning is a new topic of conversation and do not have this familiarity. The reality is that the consultation was aimed at a group of businesses, organizations and individuals for whom planning and development is their specialist subject. It is pertinent that in the survey one respondent stated that he was happy to speak in public in this kind of forum, however he said that others stated that they *“would be terrified”* and that the seminar and workshops would not work for the people less familiar with jargon and topic matter.

It is clear that some barriers were identified and overcome, however there remained a number of significant barriers to involvement and overall the achievement of the standard was again inadequate. For example, all events were held during the day and on weekdays, thus excluding anyone who could not attend during normal working hours. Other barriers that are just as real to people such as lack of familiarity with the subject, lack of confidence in attending events of this nature were not identified or considered adequately.

The Government’s response to why events were only held during working hours was that *“the events had to be timed to allow a broad spectrum of people to be involved.”* They also stated that *“the agenda for the events took a full day to complete (allowing for travel time)”*. They justified their argument by saying that *“These events proved very effective at eliciting responses and generating discussion on a broad range of issues in open*

*sessions and workshops. It would have been difficult to undertake such extensive engagement on the basis of a few hours in the evening. There are also important groups in society such as more elderly people who may be reluctant to attend evening events, particularly in winter. As for weekend sessions, again I would refer to my previous point about the events seeking to engage a wide spectrum of people.*

It seems that during this consultation the Government has a bias towards running events for people who can attend during the day. To say that by timing events specifically only during weekdays is encouraging a broader spectrum of people than by putting them on at different times is somewhat ludicrous. This is born out by the lack of community representation at events. It is stating the obvious that to hold events at different times of the day and during the week you will encourage a broader spectrum of people.

If the Government is serious about their commitment to widening participation in planning they should consider timing events to take into account people's working patterns. The survey showed the commitment of community councilors and individuals who were willing to juggle work commitments in order to attend the events, two stated that they were able to come as they were retired whereas others in their community council were unable to and it is also telling that three were unable to make the whole day and thus missed out on the workshop element, because they either had to return as they were coming from rural areas with poor transport options or due to get back to work.

Other barriers to involvement include having a lack of equipment required to participate. Most of the survey respondents felt they had the equipment necessary to respond to the consultation (the equipment was in the majority a computer). However one very important issue concerned a gentleman living in the Highlands who had no access to broadband and felt that with regards to e-planning this was "a serious impediment" to his participation. The consultation relied heavily on the use of web based materials thus excluding people who have difficulty in accessing the web.

All of the venues were viewed as well located and accessible to the people who attended, however an interesting comment was that the type of venue was important as many buildings such as town halls and other Government buildings can be seen as political and create a barrier to those who attend because of the nature of the building appearing imposing to those not used to attending such events. Community centers and buildings that are "less grand" might create less of a barrier to engagement.

***Did the NPF consultation achieve Standard 3 on Planning?***

*The NSCE says that all participants should be involved in identifying the needs, purpose, scope and time scale of the consultation, and the actions to be taken.*

Prior to the consultation the planning team had consulted various individuals (including the author of this report) to advise on the planning of the consultation process. It appears that the team have taken on board some of the advice given, however there remain fundamental flaws in the process that are not a result of lack of willingness of the team and more to do with the culture of the organisation they work for and the restrictions it places on them. The purpose of the planning standard is to ensure that all participants are involved in the process planning which includes agreeing timescales, roles, scope and objectives. Given the national scale of the process this is probably not reasonable to expect, however some attempt to gauge how people might like to be consulted and what methods should be used could have been attempted.

It would be difficult in practice to achieve this standard to its highest level by including all participants in the planning of the process. Clearly some attempt was made to plan the process with the involvement of others, however the time allowed to complete the process and incorporate a fully planned process into the participation statement as discussed on page 8 was insufficient.

The survey revealed a high degree of disempowerment from respondents, none of whom were involved in the planning stages. It is clear that they do not consider themselves as equal partners in the process, which the standard is designed to mitigate against by including people in the planning process. In particular the lack of clarity about who would be making the decisions and how those decisions would be made was demonstrated in the survey. It is crucial to be transparent and inclusive about decision making in consultations in order to gain the trust of those engaging with the process.

The survey asked whether the attendees understood their role in the consultation. The answers provide an interesting insight and, rather sadly, the cynicism and disempowerment felt by people who attended such events. One person said that it was fairly clear that “I was expected to listen and then ask questions of the speaker”. Another said “I was there to listen, I was not sure of their expectation of me as a complete layman” and “I feel that I was being given a presentation that if I didn’t agree with what was said they would take a defensive view”. One person said that “I assumed I was there to be informed.” Another woman stated that she “didn’t feel there was much I could say as I didn’t know enough” and so was there to listen rather than speak. The overall impression was that they felt they were there to listen and obtain information either to feedback to their groups, or that they felt did not know enough to feel confident to discuss anything. Others felt that what they would have to say was not going to be acted upon anyway. One person was very cynical about the process and stated that the 9 national projects “have already been decided upon, its just a means of fast tracking them” and said he went with no great expectations saying it would be it would be “a stitch up between Government Ministers and senior officials” so there was no point in taking part in discussions.

The survey asked attendees if they knew who was going to make the decisions and whether or not they understood how those decisions would be made. The majority felt that they had not been told who was making the decisions, two couldn't remember if they had been told. Some people felt they already knew (two stated it was the secretary of state who made the decisions, others said the Scottish parliament or MSP's).

When asked if they understood how the decisions would be made, four people said that they were not clear. One of them felt that decisions had already been made, another person echoed this. Another person said that they had "no idea what happens to all the information and how it is collated" apart from that they knew that a draft document would be published. Another statement made was that they didn't think there was a strict process of analysis of information. One person stated that the process of decision making "isn't spelt out; they get a consulting firm to analyse the decisions and put it in a report – this will give a glowing endorsement of what the Government want".

In order to build much needed trust, to dispel these sort of misgivings and to work towards a less adversarial planning system it is fundamental for the process of decision making to be clear, transparent and documented. The aim should be that participants can clearly see how their views and representations were or were not taken into account and crucially how and why that happened. The requirement is for a much more discursive process that builds understanding between all parties.

***Did the NPF consultation achieve Standard 4 on Methods?***

*The NSCE says that the methods used to consult should be fit for purpose*

The participation statement states that the purpose of the consultation is to "*encourage commitment and wide public involvement in the preparation of the NPF*" It states that the NPF preparation is "*an opportunity for national debate about Scotland's development*".

The question is, were the methods used to do this appropriate? The portfolio of methods used in this consultation was fairly wide ranging including email correspondence, meetings, seminars, workshops as well as some more innovative methods such as a video conference. The survey tested some of the methods' fitness for purpose with the result that in general they were considered excellent at providing information and helping to understand the issue. However they were less effective in promoting discussion and finding effective solutions. Again, in order to promote greater commitment and involvement, the methods used should encourage people to work together towards solutions through discussion, rather than merely to inform people.

Clearly the timescale of the consultation has affected the methods chosen and the process has been on far too short a timescale to facilitate deeper engagement. It could also be argued from some of the survey responses stated in standard 3, that the commitment towards discussion and finding solutions was less obvious than the commitment towards informing people about what was being decided for them. This may turn out to be the main barrier towards achieving a high standard.



Opportunities to attend events aimed primarily at members of the general public should have been provided to enable better engagement at a level suitable for those not familiar with the planning system.

Most of the events held were dominated by council officials, business and other lobby groups, who were articulate in the jargon and familiar with the planning process. If the NPF2 team were to achieve their aim of reaching out to those not normally engaged why did they not put on a single event specifically for them? There was no opportunity for these people to engage with the process at a level suitable to their needs? Instead lay members of the community were required to come up to the level of understanding of planning experts, who were themselves not required to speak in a jargon free manner, thus rendering the objective of being jargon free meaningless during events held.

***Did the NPF consultation achieve Standard 5 on Working Together?***

*The NSCE says that clear procedures should be used that enable the participants to work with one another effectively and efficiently.*

This standard describes the importance of behaviour towards each other. It states that people should behave openly and honestly with each other, communicating in a manner that enables people to take part and work together. It appears that the standard of professionalism and behaviour at the events was high and people felt respected, although some people were not allowed to discuss certain subjects that were ‘off limits’ and were not given a clear indication of what subjects were out of the debate.

The survey asked how well respondents felt respected included and listened to. The results came back very positive, most respondents stating that the planning team was very respectful. One person added that “The weakness [of the process] was not in their attitude. The structure was at fault. It was very limiting.” Another added a comment that there was an element of being talked at, others added that they would see how well they were listened to when the NPF comes out.

The participants gave mixed reviews on how conflict was handled, some saying it was “all very civilized” and others saying people were disregarded. On the whole conflict appears to have been handled well, although the general feeling was that there was not enough time for a full discussion so people were silenced or given very little space to express their points. One person said that he was not allowed to discuss the Beaulieu Denny line as this was subject to public enquiry. The fact that some subjects would be ‘off limits’ was not made clear at the beginning, which created misunderstandings and bad feeling. Another person complained in the same manner about the Aberdeen Western Peripheral bypass that it was an “unmentionable”.

The NPF2 draft specifies that the NPF is a framework about what we want Scotland to be like in 20 to 25 years time. The document is intended to be a forward planning document, however many developments are already in the pipeline, discussions have already begun and in several cases decisions already been made. The nature of the first round of events in scoping the document gives the impression that everything is up for discussion, when

clearly this is not the case. The consultation events asked open questions such as what the NPF2 should consider? By asking this sort of question it implies a much more open agenda and wider scope for discussion than was really the case.

***Did the NPF consultation achieve Standard 6 on Information Sharing***

*The NSCE says that necessary information is communicated between the participants.*

**Communications Strategy**

Throughout the process the Participation Statement states (para 12, 1) that the consultation is being supported by a communications strategy involving the use of local and national media, electronic newsletters and relevant publications at key stages. The communications strategy itself is lacking in detail, targets and methods to measure success. This is highlighted by the apparent use of national media to raise awareness of the consultation process. On examination of the national media it seems that mention of the NPF2 preparation appeared in the media on only one date, the 9<sup>th</sup> January 2008. As an example the Herald focuses on the national developments and makes no mention of a consultation process, dates of events or even that the public can get engaged. There is no mention of the process in google searches of any of the following local papers randomly selected, the Edinburgh Evening News, Aberdeen Press and Journal, Airdrie and Coatbridge Advertiser, Daily Record, Dumfries and Galloway Standard, Falkirk Herald.

Coverage of the local media is not detailed in the participation statement; there is no indication of press releases sent, or methods to engage other media such as TV or radio. In short the media element of the communications strategy, which had the strongest potential to raise awareness of and engage the general public in the consultation process is difficult to pin down.

The participation statement mentions other aspects of the communications strategy, which include posting articles into various planning journals and two magazines, which could be described as 'community organisation publications,' as well as through the Scottish Youth Parliament. These include the Black and Ethnic Minority Infrastructure Scotland Update (a new ethnic minority business promotion institute) and the Community Voices Network magazine or bulletins. However there appears to be no evidence of articles which raise awareness of the NPF or that advertise or encourage people to go along to the events.

The quality of the documentation was generally good, although full of jargon. The leaflet 'Small Country Big Plans' was defined as an awareness raising leaflet. It prompted 308 responses, but, who these responses are from, is not clear from the information provided on the website. Of the members of the public interviewed for this report only one recognized it as part of the NPF2 consultation exercise. When asked, few understood what it was trying to achieve, and many said that the use of jargon words such as sustainability, connectivity and communities was off putting and confusing.

People were asked about the quality of the consultation documents. On the whole people felt them to be good, with "the usual jargon". However, all participants were well

educated and were used to reading such documents. It has not been possible to assess what a member of the public with no background in planning would have made of them.

***Did the NPF consultation achieve Standard 7 of Working with Others?***

*The NSCE says that effective work will be done with those with an interest in the consultation*

People were asked to describe the relationship between the organisation they were representing or themselves and the Scottish Government's planning department. People were given six words: Helpful, Problematic, Silent, Co-operative, Respectful, Antagonistic. The word chosen most commonly (4 times) was helpful, two people ticked problematic and two co-operative. Others added words of their own – 'remote,' 'distant' and 'non-existent.'

The standards aim to promote the establishment of long-term relationships between Government, organizations and community structures. In this case it would be challenging for a national Government to establish close relationships with local organizations and individuals. However there is plenty of progress that can be made with co-ordinating the approach to community engagement with local authorities, using local channels and networks to increase awareness of national issues.

***Did the NPF consultation achieve Standard 8 on Improvement?***

*The NSCE says that there should be active development of the participants skills, knowledge and confidence*

The level of participation reached in this consultation allowed the public to hear and make their views clear, but did not ensure that their views would be taken into account and influence decisions. To have a more empowering engagement process, where the public have greater control over the consultation, where citizens feel they can contribute on an equal footing, requires greater skills, knowledge and confidence from everyone involved in the process. In terms of this standard, not only should skills be developed with regards to planning issues, but the softer skills of communication, consensus building, negotiation and problem solving should be too.

Participants were asked if they learnt anything from the consultation and whether they needed training to help them participate fully. Many stated they learnt a lot about the planning system by attending the events. The participants did not feel that they required further training to help them achieve the level of participation that was required of them.

Eight people stated that they felt they did not need to have any training to help them participate. One person stated that "for the limited involvement I had I do not need any more guidance. If I was to get more engaged however I would, but really I was just a bystander". Another person said that he needed "None at all I relied on life's experience of running two companies for forty years." Another person was already qualified in a relevant profession and felt that that was enough. One person (who was attending a planning consultation for the first time in her life) stated that "I learnt that planning at

present is not grassroots level. It is top down. The people in the system don't open up the discussion about development or acknowledge openly that there may be contradictions”

Eight survey respondents felt that the event organizers were ‘fairly’ or ‘very skilled’ at facilitation. However fewer people felt they were skilled at promoting discussion and identifying solutions to problems raised. A few people felt they had insufficient time or opportunity to discuss issues as they wished to and one person said that there was not only a lack of time but also there was not an atmosphere of wanting to seek joint solutions. There was a feeling amongst some participants that people were being consulted in order to bring them around to the Government's way of thinking rather than to seek solutions, new ideas or invite discussion. One person stated that they didn't need training, but felt the organizers would benefit from learning how to engage people more effectively.

### **Advisory Group**

An advisory group was established to “provide expert advice” on the content of the NPF throughout the consultation process. Beyond this explanation, the exact purpose of this group is unclear. There is no indication why these people were chosen or why these particular groups were viewed as ‘experts’ or whether people were invited to join, were nominated or self appointed. thus the result is a lack of transparency of process – the opposite to stated objectives. Minutes of the advisory group meetings are said to be on the website, but these are not contained within the NPF website page and are not available through the Scotland Government website search engine.

Considering the likely impact of the content of the NPF on the population of Scotland there is very little advice coming from, for example health, social services and environmental groups, whereas there are three representatives from the business sector, including one from the Highlands and Islands Enterprise and two from Scottish Enterprise.

When asked why the advisory group contained no representatives from the community the response from the Government was that “the Advisory Group is an expert panel which has acted as a sounding board for spatial policy development, rather than a public debating forum”. The implication of this statement is that community representatives are somehow less expert than academic or business representatives.

It is recommended that in future the public be represented on this forum, not only to balance out the vested interests of the business community, but also to help improve the quality of community engagement. It is also recommended that experts in process planning join the group to ensure that professional standards and accountable methods of evaluation are included in the consultation process.

***Did the NPF consultation achieve Standard 9 on Feedback?***

*The NSCE says that the results of the consultation should be fed back to the wider community and agencies affected.*

Whether or not people's views have been taken into account, how their views have affected the consultation document and how those changes are fed back to the participants who have taken time to participate in the consultation is the key part of the process. The better this is achieved, the more likely it is that the results of the consultation will be accepted and trust between Government and participants built. In order to achieve this standard regular feedback has to be provided. Results of the NPF2 consultation were fed back to the public regularly. However the decision making process was not transparent. It is not clear how representations were taken into account and no-one was informed of how their views had affected the draft document. There is no indication of how strong feelings were about issues, no follow up on concerns raised and no indication as to why some issues raised were ignored while others were taken into account. This part of the process is lacking in transparency, clarity and is altogether inadequate.

During the consultation period eight newsletters were produced and according to the written correspondence with the NPF team issued to 7366 participants. The purpose of these was to provide feedback on the process. Eight participants of the 20 people surveyed said they received no feedback. Two participants said that it was available on line although one had not gone on line to view it. Another participant said they received something in the post 6 weeks after the event.

The NPF website states that, "Full consideration of the representations received will be ongoing throughout the preparation process. Newsletters on how the representations have been taken into consideration and any conclusions which have been drawn will be made available on the NPF web page promptly."

The newsletters deliver succinct reporting of the results of discussions in the workshops. However, the claim that there will be explanations as to how the representations have been taken into account has not been fulfilled. There is no explanation in any newsletter or web page that feeds back how the decisions were made, about what would be taken into account from people's comments in the consultation and what would be ignored. An example can be given in the list of potential national developments. Of the 64 suggestions made in the first round of consultation and fed back in the 2<sup>nd</sup> newsletter, only 9 of them were subsequently chosen as national developments. There is no explanation in any of the subsequent newsletters or web pages why the others did not become part of the list of national developments.

Nor is any explanation given for why one criterion, namely the sustainable economic development criterion has been favoured over the others. Only one of the national developments in the Statements of Need has been identified as making a contribution to preventing climate change, whereas all make a contribution to Scotland's sustainable

economic development. There is no explanation in the feedback as to why one criterion has been favoured over another.

Although the newsletters told people what decisions had been made, none of them refers to the process of **how** decisions have been made or how the analysis of people's views has been conducted and what weight has been given to different views. In order to maintain transparency and openness it is fundamental that it be done.

***Did the NPF consultation achieve Standard 10 on Monitoring and Evaluation?***

*The standards state that through monitoring and evaluation we can assess whether the engagement achieves its purpose and meets the national standards for community engagement.*

The evaluation of the objectives and purpose of the consultation as set out in the participation statement has already been mentioned on page 6.

Pan 81 also provides a checklist for local authorities to use as a guide to their evaluation and monitoring procedures. It asks them the following:

- Has the community been made aware of the programme for participation in development plans and opportunities to make their views known on planning applications, including in pre-application consultations in required circumstances?
- Have those most likely to be affected by the development plan or development proposal been given opportunities to make their views known?
- Was the engagement in a manner, location and at a time that allowed a wide range of people to make their views known?
- Has the planning authority or project team analysed the results of the engagement and provided feedback to the community?
- Has the planning authority or project team responded by amending the plan or proposal where possible?
- Where changes have been made, have details of the revised plan or development scheme been publicised with an explanation of how people's views have influenced it?

Will the Government be asking themselves the same questions when it comes to monitoring and evaluating the NPF consultation process?

Paragraph 17 of the participation statement provides information on the NPF2 consultation monitoring and evaluation phase. It states that the evaluation process will consist of feedback from the evaluation forms, at the regional seminars, events and meetings. Beyond this there is no indication **in the participation statement** that NPF2 team intended to monitor and evaluate their own participation process using the questions set out the Scottish Governments planning advice note 81 or that there will be an evaluation of the objectives stated in the participation statement using feedback from people who 'have an interest in the focus of the consultation.'

The first objective states that the ‘arrangements for participation are inclusive, open and transparent’. The only method used to gain feedback from the public was from the evaluation forms collected at events. These forms however did not ask any questions about the transparency of the process, or how inclusive participants felt the process was.

Monitoring and baseline data are required throughout the consultation in order to assess, not just what events and activities took place, but to determine what they actually achieved. These data needs should be established early in the process. In the interests of transparency and openness these measures should be discussed in the participation statement. Ideally key stakeholders should inform these measures.

PAN 81 states that a key part of the new assessments that will examine planning authority performance will be to examine the scope and quality of local authority participation with individuals, communities and bodies. It is hoped that this report provides a basis for discussion of the scope and quality of the national Government’s performance and will help to inform future guidance on assessment.

## **Conclusions**

During and since the passage of the Planning Scotland Act 2006, the Scottish Government has emphasized the critical importance of promoting better and earlier public participation in the planning system. It set out standards in PAN 81 to promote this. Yet in terms of the most powerful Planning Document in the land these standards of best practice have not been met. Despite willingness on the part of the staff managing the process, it is clear that this process was poorly designed at the outset, lacking clarity and transparency. The process was not exclusive but cannot be claimed to have been inclusive either because it failed to proactively reach beyond the people already knowledgeable about the planning system. Nor was their sufficient action to involve people most likely to be affected by the policies and developments proposed in the document.

Whilst the sample of participants interviewed found the process was conducted in a professional manner by the staff involved, few felt empowered. The influence of people from communities on the final decisions is unclear and should be investigated by the Scottish Parliament. It seems that the Scottish Government's practice of community engagement differs from the Standards it has set itself. In practice it is more about informing people of decisions already made, when it should be giving them a role in, or allowing them to, influence the decision-making process. Whilst this requires a fundamental culture shift for planners and Government, it is the bedrock that the 2006 reforms were built on. Failure to grasp this point means that the Scottish Planning system is on shaky foundations indeed.

The fact that the Scottish Government cannot meet its own standards sets a dangerous precedent. It sends the wrong message to local authorities that are considering how to consult on the next generation of development plans. It is now up to the Scottish Parliament to put this right by properly engaging those members of the communities throughout Scotland that this process either did not reach or failed to convince that their view actually mattered.

## **Recommendations**

The report concludes that the participation statement objectives were not met and therefore asks that the NPF2 consultation process be thoroughly reviewed and improved until the Government's own standards are fulfilled and the participation statement objectives achieved.

The results of this evaluation demonstrate a need for greater understanding of what participation and community engagement really mean. The report asks that training and support be given to planning officers in order to increase the skills required for successful community participation. Any officer required to consult on a development plan should receive training in these skills and on the national standards, prior to commencing the process. Precise guidelines should be provided on how to write a participation statement and how to assess compliance with the participation statement. In addition the report asks



that all officers, Government ministers and reporters required to assess if a consultation process has complied with a participation statement, should be provided with support and training to ensure high standards are maintained.

### **Information about the author.**

Clare Symonds has worked in the area of community development and participation since 1997. First as a local authority officer, then later as a regeneration officer, she worked on several projects engaging the community on planning issues. She has run several successful consultation projects, one of which was recognized in the Sustainable Communities Awards and described by The Department for Transport as “groundbreaking”.

Clare worked for Friends of the Earth Scotland (FoES) as the Head of Community Action from 2005 until May 2008, during this period she designed and ran training sessions for over 70 community councils on the planning system and delivered training to local authority planners on how to engage communities, with particular reference to the Planning etc Scotland Act 2006. As part of her FoES policy work, she has given evidence in parliament and contributed to the consultation on the Planning Advice Note 81 on Community Engagement.

Whilst at FoES she has delivered the Higher Education Certificate in Environmental Justice a collaborative course run with Queen Margaret University and adapted the course to be run as short accredited modules, one of which is titled The Planning System and Community Engagement.

In 2008 Clare ran a series of classes providing training to over 40 individuals on effective engagement with the planning system.

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**Appendix**  
**Evaluation Framework for Consultations on Planning Issues**

**You can use PAN 81 (pages 38 – 44) and the National Standards of Community Engagement as a guide to filling this in.**

Name: Telephone number/ e-mail:

Community: Local authority:

What consultation were you involved in? (will know from the list already)

When did it take place?

Standard One: Involvement

*The National Standards for Community Engagement (NSCE) says that people and organisations who have an interest in the focus of the consultation should be identified and involved.*

**Before the event**

1. How did you hear about the consultation?

***Please tick all that apply***

- You received an invitation from the hosts
- Heard by word of mouth
- Saw it advertised in a newspaper
- Saw it advertised on a poster
- Saw it advertised on a flyer
- Heard about it on radio or TV
- Other (*please specify*)\_\_\_\_\_

2. How many weeks notice were you given about the consultation?

3. Was this enough notice?  
If no, why not?

4. Why did you participate in the consultation? i.e. what was of interest to you, and why did you take the time to go to it?

5. Did you have specific information you wanted bring to the consultation?

Yes	
No	

Was this specific to policies within the planning framework or one of the 9 national developments eg Forth Road Bridge or Commonwealth Games Facilities?

Yes	
No	

**During the event/ process**

5. How many people were at the event?

- 1-10
- 11-25
- 26-100
- 100+

7. If the consultation was more than one event can you say how many people were involved in the whole process?

- 1-10
- 11-25
- 26-100
- 100+

8. In your opinion were those who took part in the consultation representative of the area or your community?

If not can you say why not?

*Evaluation of Standard One*

Good	Average	Bad

**Standard Two: Support**

The NSCE says that any barriers to involvement should be identified and overcome.

1. Did you have all the equipment required to respond to the consultation? (e.g. computer, photocopier)

Yes	No

*If you attended an event such as a meeting or workshop as part of the consultation, please answer the following 5 questions :*

2. What time and day of the week were events organised?

3. Was this a good time for you?

Yes	
No	

If no why

4. What venue was used?

5. In your opinion was this in an accessible location?

Yes	
No	

If no why

6. Were you aware of any support offered to attendees:

*Please tick all you were aware of*

- Transport There was free parking
- Expenses
- Care for children/dependents
- Disability access
- Communication aids
- Refreshments Good
- Other (please specify) \_\_\_\_\_

*Evaluation of Standard Two*

Good	Average	Bad

**Standard Three: Planning**

A consultation process takes a lot of planning before it takes place The NSCE says that all participants should be involved in identifying the needs, purpose, scope and timescale of the consultation, and the actions to be taken.

**Before the consultation**

1. Overall, how well do you think the consultation was planned in advance? Were you aware of any planning of the consultation in advance?

Yes	No

If no please comment

2. Were you involved in the planning stages of the consultation?

**If yes, how did this happen?**

3. Were you involved in choosing the methods used for the consultation?

Yes	No

If yes how?

**During the consultation**

4. Were you clear what exactly was being asked of you / what role you played in the process?

Yes	No

5. Were you informed of: *Please tick all that apply*

- The aims and objectives of the consultation
- Exactly how your views would affect the process
- The timeframe allocated to the process
- The constraints over what could change
- Other influences on these limits (financial, legislative, technical etc)

6. Were you told who was going to make the decisions?

Yes	No

If yes, how was this explained?

7. Did you understand how the decisions would be made? Decision-makers would have a clearer idea after listening to others' questions.

Yes	No

If not can you say how it could have been better?

#### *Evaluation of Standard Three*

Good	Average	Bad
		x

#### **Standard Four: Methods**

The NSCE says that the methods used to consult should be fit for purpose

1. Please describe the methods and techniques used to consult you, i.e. did you attend a meeting, fill in a questionnaire, go to a workshop or all of these?

2. How effective do you think the methods used were in:

*Please tick the most appropriate answer for each*

Workshop

	Very effective	Quite effective	Not at all effective
Getting information			
Promoting discussion			
Helping understand the issue			
Informing you what was happening			
Promoting effective solutions			

Other method eg a meeting

	Very effective	Quite effective	Not at all effective
Getting information			
Promoting discussion			
Helping understand the issue			
Informing you what was happening			
Promoting effective solutions			

3. How were your views and opinions recorded and documented?

*Please tick ONE*

- You wrote down your response
- Some one else recorded my views
- Other (*please specify*) \_\_\_\_\_

Please describe how this was done

4. Do you think your views were recorded accurately?

Yes	
No	

Why? (ie what makes you say this?)

If there was more than one stage to the consultation process, i.e. there was a workshop followed by another workshop or a feedback session, please answer the following two questions

5a. Were you involved in all the stages of the consultation?

Yes	No

5b. Did they build on work from previous sessions or were the same issues discussed again?

Yes	No

*Evaluation of Standard Four*

Good	Average	Bad

**Standard Five: Working Together**

The NSCE says that clear procedures should be used that enable the participants to work with one another effectively and efficiently.

**During the consultation event/s**

1. How well did you feel:

*Please tick the most appropriate answer for each*

	Very well	Quite well	Not at all well
Included			
Respected			
Listened to			



2. Was there any conflict?

If yes, how well was it handled?

*Evaluation of Standard Five*

Good	Average	Bad

**Standard Six: Sharing Information**

The NSCE says that necessary information is communicated between the participants.

Did you receive any consultation documents prior to during or after the workshop?

1. How did you obtain the consultation documents?

2. Were the consultation documents:

*Please tick all that apply*

- Easy to read/ jargon free
- Free
- Alternative formats
- Available online
- Available in advance (some)
- Other (*please specify*) \_\_\_\_\_

3. How adequate did you find these documents?

Very good	Good	Inadequate	No good at all

4. Did you have access to all information not bound by confidentiality, or were some of them said to be confidential documents? (probably not relevant omit if necessary)

Yes	
No	

*Evaluation of Standard Six*

Good	Average	Bad

**Standard Seven: Working with Others**

The NSCE says that effective work will be done with those with an interest in the consultation

1. What community organisation were you representing when you were involved in this consultation?

2. How often does this organisation have communication with the Scottish Government’s planning department?

Once every:

*Please only tick ONE*

- Monthly
- 1 – 2 months
- 3 – 6 months
- Other (please approximate) \_\_\_\_\_
- Only when there is an application

3. How would you describe the relationship between your organisation and the Scottish Government’s planning department

*Please tick all that apply*

- Helpful
- Problematic
- Silent
- Co-operative
- Respectful
- Antagonistic
- Other \_\_\_\_\_

Comments:

*Evaluation of Standard Seven*

Good	Average	Bad

**Standard Eight: Improvement**

The NSCE says that there should be active development of the participants skills, knowledge and confidence

1. How much do you feel you learned from the consultation?

A lot	Quite a lot	Not much	Nothing

2. Do you feel that you needed training or guidance to help you participate effectively?

Yes	No

Why?

3. What training/ guidance were you given to support your participation? Please describe what this was and who gave it, e.g. leaflet or workshop.

4. How skilled do you think the organisers were at:

*Please tick the most appropriate for each*

	Very skilled	Fairly skilled	Not very skilled	Not at all skilled
Facilitating the event				
Promoting discussion				
Listening				
Managing conflict				
Identifying solutions to problems raised				

5. Were you asked for your comments on how the consultation was run? Several times, they urged us to return our Evaluation forms

Yes	No

*Evaluation of Standard Eight*

Good	Average	Bad

**Standard Nine: Feedback**

The NSCE says that the results of the consultation should be fed back to the wider community and agencies affected.

1. Was feedback from the consultation:

- Sent directly to you
- Published in paper
- Available on the internet
- Given in meeting
- No feedback
- Other \_\_\_\_\_

2. How many weeks did you have to wait for feedback?

3. How clear would you say the feedback was?

4. Were you told how your views affected the consultation

5. Did your views result in any changes being made? Didn't express any views

Yes	No

If no, do you understand why they didn't?

*Evaluation of Standard Nine*

Good	Average	Bad

Standard Ten: Monitoring and Evaluation

By monitoring and evaluating the consultation process yourself you are helping to fulfill standard 10.

1. **Overall**, would you say that this consultation was:

Good	Average	Bad

Thank you