Stakeholder Involvement in the North West Regional Spatial Strategy

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1. Introduction

Background
The purpose of this study is to understand and evaluate the experience of stakeholders in the formation of the Regional Spatial Strategy (RSS) with a view to helping to secure full and effective participation in the planning process.

With this in mind, the research has sought to gather and analyse the views of stakeholders and to understand in what ways they were involved in the process; in what ways they were able to influence it; and to what extent they were satisfied or dissatisfied with the process and elements of it. Not all respondents to the survey had been involved in the process and, in these cases, it was important to find out why and what changes might have made it possible or attractive for them to do so. Our study comprised a postal survey followed by interviews with a sub-section of the respondents.

It should be remembered whilst reading this report that the research has primarily aimed to survey and document stakeholder views. We have endeavoured to present these views faithfully. Our summary must therefore be understood as recommendations in the light of these views, rather than a comprehensive analysis based on a full study of the process. Clearly, our findings point to avenues of further research in which it may be possible to put the stakeholder experience in the context of other, potentially conflicting, goals.

Report Structure
The report begins by outlining the context of the RSS preparation process, namely the changes in regional planning since 2001. It then details the methods used in the research before reporting on and discussing the nature of the responses to the questionnaires and interviews. The presentation of the findings, the main body of this report, begins with issues affecting the levels of participation in the RSS process and then discusses stakeholder comments on the process as a whole and at individual stages of the process. We conclude with a summary of key issues and recommendations stemming from the research.
2. Context

Reform in the Planning System
December 2001 saw the publication of the Planning Green Paper: ‘Planning: Delivering a Fundamental Change’ (DTLR, 2001), beginning a process of comprehensive reform of the planning system that culminated in the Planning and Compulsory Purchase Act (PCPA) 2004. The justification for this change was that the existing planning system was complex, remote, hard to understand, difficult to engage with, slow and unpredictable and, generally, ‘not customer friendly’ (DTLR, 2001, 2.2 – 2.7).

The planning reforms also marked a move away from a narrower land use focus to a broader spatial planning approach. The new system of Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF) are ‘...intended to integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function’ (ODPM, 2004, p13). Unlike the Regional Planning Guidance (RPG) documents they replace, the RSS is an integral part of the statutory development plan, thus reinforcing the standing of regional land-use planning (Pearce and Ayres, 2006).

The purpose and content of Regional Spatial Strategies are detailed in Planning Policy Statement 11 (ODPM, 2004). They should set out a broad development strategy for the region for a 15 to 20 year period and in particular indentify:

- the scale and provision of new housing;
- priorities for the environment, such as countryside and biodiversity protection;
- directions for transport, infrastructure, economic development, agriculture, minerals extraction and waste treatment and disposal.

The RSS should be consistent with, and supportive of, other regional frameworks and strategies and the preparation of the draft must be carried out on the basis of partnership working with regional stakeholders and community involvement. This partnership working, according to Annex D of PPS 11, should take place throughout the process, not only at the stage of the submitted draft. There is expected to be a wide range of stakeholders:

The stakeholders will include other statutory agencies and bodies (including the statutory environmental bodies), business and commercial organisations (including representative bodies such as the CBI and the Chambers of Commerce), transport providers and operators, utility companies and the house builders, local regeneration partnerships and voluntary and women’s organisations. (PPS 11, p85)

Neighbouring planning authorities, it continues, should also be consulted, as will education and health trusts.

The key principles underlining this consultation are outlined in PPS1 (ODPM, 2005):

- Community involvement that is appropriate to the level of planning. Arrangements need to be built on a clear understanding of the needs of the community and to be fit for purpose;
- Front loading- there should be opportunities for early community involvement in the revision process;
- Using methods which are relevant to the experience of communities;
- Clearly articulated opportunities for continuing involvement. Community involvement is not a one-off event;
- Transparency and accessibility; and
Planning for involvement. Community involvement should be planned into the process for revising the RSS from the start.

Alongside ‘partnership working’, PPS 11 also calls for ‘community involvement’. The wider-community is defined as ‘all those who have an interest in and a contribution to make to the content of the revised RSS’ and therefore ‘should include individuals as well as local authorities and bodies representing various interest groups.’ Although the emphasis is on involvement at the stage of revising the strategy, it states that the community, should have a sense of ownership of the strategy, and suggests how this is to be achieved:

Involvement means more than the provision of information and the invitation to respond to consultation documents, although both of these have a role to play. It should mean the opportunity to participate in shaping the RSS revision, especially before it is submitted to the Secretary of State. (PPS 11, p90)

The North West Regional Spatial Strategy
Consultation on the North West RSS began in Autumn 2004 with a period of preparation, development of issues and discussions with key stakeholders. During 2005, informal consultations on options for the key strategic elements of the RSS, and on the interim draft of the RSS, took place and in 2006 a draft of the strategy was submitted to Government and presented for formal consultation. Once comments were in, the Examination in Public (EiP) discussed pertinent issues and the panel submitted their Report to the Secretary of State.

A partial review of the RSS began after the publication of the Secretary of State’s proposed changes (in March 2008) and is ongoing at the time of writing. The partial review focuses specifically on issues around Gypsies and Travellers, Travelling Showpeople and car parking.

For the purposes of this research, the process of the formation of the RSS has been divided into five different stages. An additional sixth and seventh stage - the partial review and publication of the strategy - have been included in table 2.1 for completeness but, since these stages occurred after the questionnaires were returned and the interviews carried out, there is no further analysis of these stages in this study.

| Stage 1 | Autumn 2004 | awareness raising, preparation of information, issues consultation, and discussions with identified groups, forums, partnerships |
| Stage 2 | Early 2005 | informal consultation on options for key strategic elements of the RSS |
| Stage 3 | Autumn 2005 | informal consultation on interim draft of RSS |
| Stage 4 | Spring 2006 | formal consultation on draft RSS following submission to Government |
| Stage 5 | Autumn / Winter 2006/07 | Examination in Public (EiP) |
| Stage 6 | March 2008 | publication of the Secretary of State’s proposed changes and start of partial review |
| Stage 7 | September 2008 | publication of the final RSS |

Table 2.1 – Stages In The Formation of the North West RSS
3. Methodology

The research was carried out in two phases: a postal questionnaire followed by interviews with a small, and partly self-selecting, subset of the questionnaire respondents. This survey was followed by initial analysis, discussion of emerging findings at a Regional Studies Association (RSA) international conference in May 2008 and then some further analysis and report writing. Figure 3.1 shows this process.

### 2007

<table>
<thead>
<tr>
<th>June</th>
<th>July</th>
<th>August</th>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
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</table>

<table>
<thead>
<tr>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
</tr>
</thead>
<tbody>
<tr>
<td>questionnaires sent out</td>
<td>deadline for questionnaire returns</td>
<td>initial analysis</td>
<td>interview planning</td>
</tr>
</tbody>
</table>

### 2008

<table>
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<th>Feb</th>
<th>March</th>
<th>April</th>
<th>May</th>
<th>June to Dec</th>
</tr>
</thead>
<tbody>
<tr>
<td>interviews with selected respondents</td>
<td></td>
<td></td>
<td></td>
<td>initial analysis</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>May</th>
<th>June to Dec</th>
</tr>
</thead>
<tbody>
<tr>
<td>presentation of initial findings at RSA conference</td>
<td>further analysis and report writing</td>
</tr>
</tbody>
</table>

**Questionnaire survey**

The questionnaires were sent out after the close of the Examination in Public (EiP) and after the publication of the Panel Report (8th May 2007). It was sent to a database of 2618 addresses, which were obtained from the NWRA in hard copy form. Whilst we received 102 responses, and this may seem like a very low response rate (4%), there is reason to suppose this is more representative than it
might first appear. The list of 2618 addresses was previously used by the NWRA for the consultation on
the submitted daft RSS document (stage 4 in this report). In response to the NWRA consultation, only
182 people submitted comments, representing a response rate of only 6.4% in terms of the original
RSS consultation process.

This means that much of the list to which our questionnaires were sent covered people and
organisations that did not engage in the RSS process at all but were nevertheless on the NWRA’s
mailing list for one reason or another. One of our respondents, for example, informed us that she had
simply made an enquiry about an aspect of the strategy that was reported in a newspaper, and was
subsequently sent a copy of the strategy but did not actually engage in the RSS preparation process.
The database also included libraries and universities, which were intended to be depositaries of
information rather than consultees. Because of data protection restrictions, the address database was
provided only in paper form and it was not practical to select a subset. In any case, we felt that taking
such an approach may have excluded a small minority of people who would nevertheless want to
respond.

In order to understand how responses to our survey correspond to responses to the original NWRA
consultation, it is helpful to divide the returned questionnaires into four groups, as shown in table 3.1
and figure 3.2.

<table>
<thead>
<tr>
<th>Group</th>
<th>Description</th>
<th>Responses</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>These respondents returned the questionnaire, to inform us that they were not involved with the RSS consultation, completing none of the quantitative answers and giving only brief information to explain their lack of involvement.</td>
<td>23</td>
<td>22.6%</td>
</tr>
<tr>
<td>B</td>
<td>These respondents returned the questionnaire and told us that they were not involved with the RSS consultation but also answered some of the quantitative questions to indicate why they had not taken part.</td>
<td>19</td>
<td>18.6%</td>
</tr>
<tr>
<td>C</td>
<td>These respondents didn’t fill in the questionnaire but provided a letter with comments on their involvement in the RSS consultation. Their information is therefore used in the qualitative aspects of the analysis, but not in the quantitative analysis.</td>
<td>2</td>
<td>2.0%</td>
</tr>
<tr>
<td>D</td>
<td>These respondents had taken part in the RSS consultation at least to some extent and had completed both quantitative and qualitative elements of the questionnaire.</td>
<td>58</td>
<td>57.0%</td>
</tr>
</tbody>
</table>

Table 3.1 - Grouping The Respondents by the Nature of Their Response

The difference between groups A and B in table 3.1 is that group A simply informed us that they did not
take part in the original RSS consultation process, whereas those in group B gave additional
quantitative information about why they had not taken part. For the purposes of quantitative analysis,
there is a total of 100 responses (i.e. Group C is excluded, because the information was only provided
qualitatively).
Of the 182 people who responded to the NWRA consultation, 60 people (groups C and D in table 3.1) responded to our consultation, making our response rate equivalent to around a third (33%) of those originally involved in the RSS process. Additionally, we received responses from a further 42 people (groups A and B in table 3.1) who had not taken part in the original RSS consultation. These responses were very useful in highlighting some of the difficulties and barriers to involvement in the consultation.

Figure 3.2 – grouping the respondents by the nature of their response (see table 3.1)

Questionnaire respondents were asked to self-define themselves as one of the categories in table 3.2.

<table>
<thead>
<tr>
<th>GROUP:</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
</tr>
</thead>
<tbody>
<tr>
<td>regional representative body</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>other government body/agency</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>local planning authority</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td>other local Government body</td>
<td>17</td>
<td>12</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>Infrastructure / transport/utility providers</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>business / business association / trade union</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>developers / developer's association</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>academic / professional bodies</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>local neighbourhood groups etc</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>environmental groups</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>9</td>
</tr>
<tr>
<td>local strategic partnership</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Individuals</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>8</td>
</tr>
</tbody>
</table>

Table 3.2 – Stakeholder Types (self-defined)
Here, ‘other local Government body’ includes (and is almost entirely) Parish Councils. Further-dividing this list into groups A to D, it becomes clear that groups A and B (i.e. those who did not take part in the RSS consultation) are made up mostly of this category of respondents. This reflects the situation that all parish councils in the region were included in the NWRA database (and hence our survey) but only a relatively small number of these parish councils were actively involved in the RSS process.

**Interviews**

The postal questionnaire contained a question about the possibility of carrying out subsequent interviews with the respondents. To some extent the interviewees could be argued to be somewhat self-selecting, but we were in fact presented with a large and varied subset from which we were able to choose candidates. Where possible, questionnaires raising specific issues about which further discussion would be beneficial were selected for interview, and it was ensured that a range of organisations was included. Our interviewees were drawn from Government agencies, utility companies, local planning authorities and campaign organisations. A set of generic questions were asked consistently in each of the interviews, together with other questions drawing on any specific issues that that respondent had raised in their earlier questionnaire responses and to further explore issues particularly pertinent to them, their organisation or others in similar organisations.

In addition to interviews with respondents, we choose to talk in depth with a representative NWRA in order to better understand the process from the perspective of the Assembly. This interview was placed towards the end of the period of interviewing so that we could discuss relevant issues that respondents had raised in the questionnaires or interviews.
Timing of the Research

Our research was carried out towards the end of the RSS process but before the ‘results’ (i.e. the final content of RSS) was announced. Our respondents therefore had an idea of how influential they had been, since they had seen the submitted draft RSS, but did not know what changes may have been made by the Secretary of State. This has advantages and disadvantages but we felt that it was useful, given our primary focus on the experiences and perceptions of being involved with the consultation rather than the substance of the policy, to be surveying attitudes before the publication of the final RSS. Resources did not permit us to carry out separate surveys immediately at the end of each of the stages, meaning that we had to rely on respondents older memories of earlier stages and also acknowledge that their perspectives of these earlier stages could be coloured by subsequent experience of later stages. However, carrying out the survey towards the end of the whole process did enable respondents to look back and compare their experiences across the different stages and to take an overall view of the process.
4. Participation

Respondents were asked to specify in which stages of the RSS consultation they were involved, and in what ways they were involved. Table 4.1 presents their answers. Many people ticked more than one activity per stage. Therefore although the ‘involved in some way’ column indicates how many respondents ticked at least one activity for that stage, this is not necessarily the sum of columns a to g, since some respondents were involved with more than one activity per stage.

<table>
<thead>
<tr>
<th></th>
<th>a</th>
<th>b</th>
<th>c</th>
<th>d</th>
<th>e</th>
<th>f</th>
<th>g</th>
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<tbody>
<tr>
<td>involved in some way</td>
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<td>involved in</td>
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<td>11</td>
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<td>3</td>
<td>0</td>
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<td>and/or</td>
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<td>member of specific</td>
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<td>28</td>
<td>1</td>
<td>10</td>
<td>17</td>
<td>4</td>
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<tr>
<td>direct resource</td>
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<td>16</td>
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<td>other</td>
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</tbody>
</table>

Table 4.1 – Number of Respondents Involved at Each Stage and in What Way
Reasons for being involved

Respondents were asked for the reasons why they got involved in the consultation. The answers were varied. Some were, or felt that they were, obliged to:

- they are a statutory consultee;
- they are a neighbouring planning authority – i.e. not within the North West but with an interest in it;
- they are a major company operating at a regional level;
- they were specifically invited to do so.

Others had particular matters on which they wanted to influence the RSS, such as:

- to ensure the local authorities' priorities are reflected in the RSS;
- to address a key local issue that would be affected by the RSS;
- to influence, via the RSS, planning policy for their local authority area;
- to represent the views of a particular industrial sector;
- to indirectly influence the content of emerging structure plans;
- to promote the ‘third sector’ (the voluntary and community sector);
- where the RSS had a potential effect on the their property portfolio.

Another expressed concern at the loss of powers at county level and felt that involvement in the RSS would help to address this. One respondent simply stated that they wanted to ‘gain recognition within regional planning.’

Reasons for not being involved

Respondents in Group B (those who were not involved with the original NWRA consultation but who completed our questionnaire) gave the following reasons for their lack of involvement in the process. It is worth recalling that these are mostly parish councils.

For some it was a lack of awareness that the process was happening:

- They had not heard of the RSS and/or were not aware of the consultation. In some cases respondents expressed concern that they had been excluded ('We should have been involved and were excluded by omission.' ‘Who was involved? We have heard nothing.’) This was by far the most common reason given by group B.

Others, although aware of the strategy, found it hard to understand or were unable to contribute. These extracts from the comments received illustrate such positions:

- There was too much ‘government speak’ in the consultation ‘Totally unable to understand.’ ‘Information too lengthy [and] in inaccessible language.’
- There was too much reliance on Internet communication, which is difficult for some small groups.
- Insufficient resources to deal with this sort of issue. ‘We are a very small parish council of 8 members who meet 6 times year. We cover a small rural parish of about 1,200 – does this survey apply to such an organisation?’
- The RSS was not of interest to them.
- ‘The title ‘Regional Spatial Strategy’ is not informative and does not invoke enthusiasm.’
• ‘difficult to see how [we] would find the resources to engage, or the expertise’
• ‘What ever does “spatial strategy” mean?’

Additionally, a few respondents in Group A (not involved in RSS process and didn’t complete the qualitative sections of the questionnaire) provided some brief additional comments:

• they do not recall the RSS consultation or process (‘our survey was the first time that they had heard of it’ ‘I have absolutely no idea who you are or what you are about’)
• feeling that they should have been involved but were not;
• noting that there had been a change of personnel and no earlier records of involvement;
• feeling that it is no relevance to them (‘I would need a lot more information to convince my Parish Council that any of this is relevant.’).

Barriers to Involvement

Question C8 of the questionnaire asked about barriers to involvement, requiring respondents to identify particular difficulties in participating in the RSS process. Table 4.2 and figure 4.1 divide these answers into separate responses from those in groups B and D - i.e. those who did not take part in the actual RSS process (b) and those who did (d).

![Table 4.2](image)

Table 4.2 – Number and Percent of Respondents Selecting Particular Reasons for Difficulty in Participating in RSS (separated into groups B and groups D to highlight differences between those who participated and those who did not)
This table highlights the fact that, for those who did not participate in the RSS consultation, it was a lack of sufficient information to understand both the consultation process and the regional planning process itself that were the biggest barriers to participation, with large numbers of respondents from group B reporting difficulty understanding either the RSS process (47.4%) or the regional planning system (57.9%) compared with only 6.9% and 3.5% respectively for respondents from group D.

Respondents in groups B also reported that access to information was a problem to a greater extent than those in group D. Group D, on the other hand, found the pressure on staff resources and the amount of additional work and research that was involved to be problematic, but evidently not enough to stop them from participating at all. The rest of this section presents an analysis of the more expansive, qualitative responses to participation.

**Difficulties for Smaller Organisations**

Local neighbourhood groups and parish councils often found it difficult to participate. This response is not atypical:

> Non-professional groups such as ours are not geared up to participate fully. Yet our views are more valid than ‘establishment’ planning professionals as we have better evidence and first hand knowledge of the effect of policies.

This respondent suggested that additional support should be available to such groups, or additional weight given to their comments, to ensure that their views are not ignored. Expressing their frustration at the lack of weight given to their evidence base, which they consider to be better than that of others, and feeling ‘totally ignored’ they added ‘what is the point in taking part’.

One Parish Council raised some substantial concerns with the Draft Regional Spatial Strategy for the NW on receiving it. In their response to our questionnaire, they sent copies of their correspondence with the North West Regional Assembly. Their concerns reflect those of many of the parish councils we heard from:
Because they have better things to do, none of the Councillors would wish to absorb a 120-page document (let alone the three other main documents, the Sustainability Appraisal and Summary and the Technical appendices – a further 356 pages) unless it was relevant, illuminating, concise and clear. The RSS is none of these things.

Their comments highlight an important issue, which is that, communicating complex issues to the consultees results in documents often being long and therefore very time-consuming to read, which becomes counterproductive because the consultees then do not have time to read it. This particular parish council suggest that the RSS could have been presented more concisely, describing it as ‘a load of porridge, being extremely generalised, long-winded and repetitive, as you can see from almost any paragraph.’ They also note that there needs to be more clarification to make the large documents easier to read. For example, although the draft RSS document contains a glossary of terms, there is no list of abbreviations and acronyms, no cross-referenced index of policies and one of the tables contains references to the objectives of the Regional Transport Strategy, by number only. This parish council found these difficulties ‘maddening’ and it is clear that more could be done to make the documents more accessible, even without necessarily reducing their size. They also felt that the RSS tended to cover too much ground and generalise too much. They note two areas of the North West that are almost entirely unaffected by the RSS but someone would have to read the whole document to find this out. The outcome, they suggest, is that:

Consultees will progressively pay less and less attention as requests for opinion involve them in prolonged unnecessary reading.

Awareness of RSS

For many of the parish councils that responded, our questionnaire was the first indication they’d had about the strategy and, although they were very concerned with local issues, they could not see its relevance:

Whatever does “spatial strategy” mean? Our councils are concerned with the welfare of the village which they have been elected to serve and fulfil their perceived duties with dedication. They maintain good links with the local district council and with [the] County Council, but I’m afraid they express no interest in the North West Regional Assembly.

Local neighbourhood groups expressed their lack of knowledge about the RSS succinctly:

I have no idea what you are talking about in this document. I have not met anyone who knows what an RSS is.

The title “Regional Spatial Strategy” is not informative and does not invoke enthusiasm.

For individuals with no direct involvement in the planning system, the consultation documents were difficult to deal with:

As an individual who has an interest in planning environmental issues locally, who has some experience of reading documents of this kind, I still found the document very hard going.

This made her question how inclusive the process could be:

I do remember noting that many of the consultees and ‘stakeholders’ who had responded were representatives of (for want of a better term) corporate organisations of various kinds. The number of individuals, like myself, who had shown any interest appeared to be very small. This raises the question of how the ‘little man’, as opposed to the big organisations, is supposed to gain access to strategies of this kind which have long-term implications for the areas in which he lives, and which are determined at a level he can neither access nor understand.
This person had been made aware of one aspect of the consultation in a newspaper article, but felt that this was insufficient in terms of involving people:

Reading a short reference to just one aspect of the proposals in a short newspaper item does not seem an appropriate way to find out about proposed long-term strategies for the region.
### 5. The Overall Process

#### Satisfaction and Influence

Section C of the questionnaire contained questions about the RSS process as a whole, before subsequent questions break it down by stages. Table 5.1 sets out the quantitative responses for this section of the questionnaire. The results include those from respondents in group B (i.e. those who did not take part in the actual RSS consultation).

<table>
<thead>
<tr>
<th>Question</th>
<th>Negative</th>
<th>Positive</th>
<th>number answering</th>
</tr>
</thead>
<tbody>
<tr>
<td>C2 How confident are you that you have fully understood the RSS process and the opportunities to participate in the process?</td>
<td>not confident 14.0%</td>
<td>confident 71.9%</td>
<td>57</td>
</tr>
<tr>
<td>C3 How satisfied were you with the opportunities for involvement in the RSS?</td>
<td>not satisfied 46.3%</td>
<td>satisfied 40.3%</td>
<td>67</td>
</tr>
<tr>
<td>C5 How appropriate do you consider the general timing and location of the opportunities to participate?</td>
<td>not satisfied 34.3%</td>
<td>satisfied 37.3%</td>
<td>67</td>
</tr>
<tr>
<td>C7 To what extent were you satisfied that the consultation process allowed sufficient scope for you to express your views?</td>
<td>not satisfied 36.8%</td>
<td>satisfied 41.2%</td>
<td>68</td>
</tr>
<tr>
<td>C9 Are there any issues (either substantive or procedural) that you feel were not addressed in the RSS process?</td>
<td>yes 43.8%</td>
<td>no 56.1%</td>
<td>48</td>
</tr>
</tbody>
</table>

Table 5.1 – Satisfaction with the RSS Process.

(Note: the percentages are calculated from initial Likert scale answers – for example, the percentage identified as not satisfied is based on the numbers indicating that they were either ‘very unsatisfied’ or ‘unsatisfied’ in the process. Figure 5.1 shows the breakdown across the five points on the Likert scale)

![Figure 5.1: Satisfaction with the RSS process (see also table 5.1)](image-url)
It is important to bear in mind that these questions had a relative low response. For example, although 71.9% of those answering question C2 reported that they were confident that they understood the RSS process, this is in effect only 40.2% of the total respondents (groups A, B, C and D combined). Bearing in mind that many of the people in groups A and B expressed dissatisfaction at not understanding the process but did not continue to fill out the rest of the questionnaire, this is a significant point to note. By combining questions C3 and C7, it is possible to see how satisfaction varies by stakeholder type:

<table>
<thead>
<tr>
<th></th>
<th>dissatisfied %</th>
<th>satisfied %</th>
<th>number answering question</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>33.3</td>
<td>66.7</td>
<td>3</td>
</tr>
<tr>
<td>B</td>
<td>20.0</td>
<td>50.0</td>
<td>5</td>
</tr>
<tr>
<td>C</td>
<td>8.7</td>
<td>74.3</td>
<td>11</td>
</tr>
<tr>
<td>D</td>
<td>81.3</td>
<td>11.0</td>
<td>14</td>
</tr>
<tr>
<td>E</td>
<td>0.00</td>
<td>100.0</td>
<td>1</td>
</tr>
<tr>
<td>F</td>
<td>25.0</td>
<td>0.0</td>
<td>2</td>
</tr>
<tr>
<td>G</td>
<td>0.00</td>
<td>75.0</td>
<td>2</td>
</tr>
<tr>
<td>H</td>
<td>50.0</td>
<td>33.3</td>
<td>3</td>
</tr>
<tr>
<td>I</td>
<td>64.3</td>
<td>14.3</td>
<td>7</td>
</tr>
<tr>
<td>J</td>
<td>52.8</td>
<td>36.7</td>
<td>9</td>
</tr>
<tr>
<td>K</td>
<td>0.00</td>
<td>0.0</td>
<td>0</td>
</tr>
<tr>
<td>L</td>
<td>0.00</td>
<td>0.0</td>
<td>0</td>
</tr>
<tr>
<td>M</td>
<td>25.0</td>
<td>50.0</td>
<td>10</td>
</tr>
</tbody>
</table>

Table 5.2: Satisfaction by Stakeholder Type (as percentage of those answering that question)

The bar charts below show the results to questions C3 and C7 broken down into more detail. Firstly by question C3 and secondly by question C7: The low number of respondents in some of the categories (particularly F, K, L, A, G and E) makes comparison difficult. However, the remainder of the table 5.2 indicates that the ‘other local Government’ and ‘local neighbourhood’ groups tended to express more dissatisfaction whilst the larger government bodies tended to be more satisfied. These numbers also hide the dissatisfaction expressed by respondents in groups B and C, which were mostly from the ‘other local government body’ category.

**Qualitative and Interview Responses**

**Continuity**

The issue of continuity was raised. One respondent from a campaign organisation observed that, part way through the process in spring 2005, the NWRA effectively made itself less accessible to consultees and it was difficult from that point to feed into the subgroups that had been set up. There was an initial project plan, in which various consultees had been involved in its development including this campaigner, but this was apparently replaced with a new project plan which, this campaigner felt, had
less democratic legitimacy. In another example, a government agency interviewee remarked that they had commented on drafts of policies, which were then returned rewritten, seemingly without having taken on board their comments. He felt that this might have been partly caused by shifting Government policies that meant that policies were constantly having to be rewritten. This feeling was summed up in one of the interviews:

It feels very much when you close your comments to the draft, everyone then is caught up in this wave of preparing for the EiP... and that whole body of work that you put into the response to the consultation seems to get forgotten about. It’s a different ball game... you’ve commented on the plan during the draft consultation and then when you get to the EiP [there are] different questions with different emphasis. Again, this probably needs sorting out.

**Electronic Resources**

The consultation process made deliberate and extensive use of the Internet as a communication and consultation medium. In the early stages, a specific process was employed, in conjunction with organisations Dialogue by Design and Forum for the Future. According to the NWRA:

The Assembly largely engaged with the region’s stakeholders using a combination of an innovative online consultation and complementary workshops. Although there is a perception that an online consultation is biased against those without a computer or those who cannot use a computer, the Assembly feels this is the most effective way of collecting and collating responses. Special arrangements were put in place for those who did not have access to the Internet to receive and make responses via paper copy (quoted from pre-submission RSS draft, p6).

Respondents were asked if they had any comments about the way that electronic resources and approaches to engagement were utilised. This raised a range of comments, not all in agreement. A particular issue, for example, was the character limit on the input boxes on the ‘dialogue by design’ Internet consultation. Views on this ranged from it being ‘horrible’ to it having a welcome ‘levelling effect’. A representative of NWRA commented that it forced the respondent to focus their response and avoided the situation whereby:

... quite often you’ll find, particularly with organisations, they will fill the first two pages with a general discussion about the whole process which is very interesting but we know what [their] view is on that and we’re not going to be able to change that within the context of the consultation.

It also, he added, meant that the information could be processed more speedily when it arrived, since it was already structured into the questions they asked.

A representative of a Greater Manchester-wide body reported problems with getting ‘sign off’ across his organisation. A paper submission could be signed by several parties, whereas the electronic system allowed for only one signatory and no way of confirming that this person represented a particular organisation. Whilst there was no evidence that this had occurred, it was pointed out during the interviews that there was a risk of people claiming to represent organisations fraudulently.

Other comments on the use of electronic media included issues over accessibility for those with poor eyesight, low band-width internet connections, or no internet connections at all. Some commented on the need for consultees to print out their copies of documentation and the expense that this incurred. This applied also to those who were attending meetings as part of the consultation and needed to bring their printed papers with them to the meeting. Hard copies were apparently provided on request, but it is clear from conversations with some consultees that not all of them knew about this, perhaps because they had not tried to request them.
It was also mentioned that the electronic consultation, particularly the dialogue by design element of it, did not facilitate debate because people were inputting their comments individually without seeing those from other people. One respondent suggested that email alerts would have been useful whenever new documents were placed on the website. This person had found that they became aware of some documents late on in the process because they were not necessarily checking the website regularly. Another mentioned that, due to the design of the interface, it was unclear whether a consultee would be able to see or retrieve their comments after they had pressed ‘submit’ – a simple matter of information on the procedure. One person made the pertinent point that they (a campaigner) were unclear about how the wider public was meant to have learnt about the opportunity to participate in the web consultation.

However, in the later stages when the responses of others were available on the web, one individual respondent (a cycling campaigner) reported that he felt put off by seeing other people’s responses: ‘they all seemed to have a professional background’. This is an issue in terms of involving the public at large, since they may be daunted by the professionalism and level of detail of some of the responses and feel unable to contribute effectively.

In the interviews, one person expressed concern about Forum for the Future, one of the organisations (along with dialogue by design) involved in coordinating the early stages of the Internet consultation. The interviewee pointed out that Forum for the Future had its own agenda, that of promoting sustainable development. The interviewee reported that this had been raised in a meeting during the consultation. However, in interview, a representative from the NWRA explained that Forum for the Future had a very limited input into the design of the actual questions, as opposed to administrating the process, and sustainable development would, in any case, be expected to be part of a regional policy consultation. There was therefore no evidence of undue influence.

**Timescales**

The speed at which the process was happening was also identified as an issue:

> The government imposed a timetable which has had serious detrimental impact on the quality of the product (response from a borough council).

> ‘The emphasis on [it being] short, speedy and minimising cost leads to some issues not being addressed properly/holistically e.g. environment capacity, assessment of environmental issues/problems (response from a government agency).

Another, a relatively small planning authority, expressed concern over the timescales:

> The comments I have made are based on our experience. They are unfortunately largely negative but there is little point in hiding our concerns. I would hope that Government allows proper timescales in future that will allow more in-depth analysis of issues which are of concern to bodies such as ours.

Another planning authority representative felt that although there was much to commend the process the timetable had serious consequences, such as gaps in the evidence base. This they attributed to central government ‘…continuously changing guidance whilst at the same time bulldozing their dogmatic and impractical ideas through.’

**Presentation of Policies**

One comment about presentation concerned the labelling of transport policies. A transport planner raised this in the interviews. Policies that had a connection with transport were labelled with a small symbol of a tram. The interviewee felt that it was unclear why they had done this, but moreover the labelling was, in their opinion, inconsistent. They commented at the EiP that there was not a consistent system to explain why some policies were labelled with transport and some were not. They feared that
this would be confusing to readers. Whilst a presentational issue, taken together with the comments above from one parish council (see above under ‘difficulties for smaller organisations’) imply that this sort of inconsistency in presentation could be off-putting enough to stop some potential consultees engaging with the process. More generally, even a representative of a government agency felt that the draft RSS document was ‘cobbled together and very hard to read’ and that ‘responding to such a badly written document was very difficult.’

Silo Thinking
One participant, who was generally positive about the overall process in an interview, was frustrated about what he perceived to be ‘silo’ thinking. He wanted to raise the issue of sewerage sludge, since his organisation was aiming to build a treatment facility and wanted to get regional support for it being ‘for the greater good’. Sludge is officially regarded as ‘waste’, yet this participant had been categorised as ‘water’ and therefore could not participate in the focus group on waste. Similarly, an Environmental Agency representative felt that they were forced into the ‘environment’ group, rather than being able to engage in discussion on, for example, housing and transport, and give an environmental dimension to these debates:

‘We had meetings allegedly called environment and landscape where none of this was mentioned and it was very much focussed on biodiversity, flood risk, water resources, water quality, air quality…’

This was not considered conducive to a more integrated understanding of environmental issues:

‘I’m happy to get rid of a lot of environmental policies, if the environment is actually written into the plan wholesale. I don’t need a policy on flood risk, if there’s a recognition that all the housing is going to be built outside [the] flood plain, for example.’

As a result of not being in the housing group, they received no information on housing figures until late on in the process and had to react quickly to them, rather than be more closely involved with the development of the policies. This situation improved, but in the early stages of the consultation this person felt ‘very much pushed aside’.

A transport planner working at the sub-regional level had similar experiences:

‘When we went to the transport people and said to them ‘why’s that policy there?’… they said ‘we don’t know, the planners did that’… There’s a theme running through that of a certain [group] of people sitting in silos saying ‘you’re job is to do transport, our job is to do this...’

He felt that this was reflected in the draft RSS:

‘... when you read the plan it’s fairly obvious it’s written by different people because the actual style of the policies should be the same, you should have the same general criteria, but it differs; sometimes by not very much, but it differs.’

Evidence Base
Several comments were received on the subject of the evidence base. In particular, the housing data was felt by several respondents to have arrived too late in the process and that better, earlier communication about it would have made for a better debate. One interviewee felt that the housing evidence base was not enough to underpin the chosen policy.

More generally, a cycling campaigner expressed frustration at the requirement to produce evidence to back up everything. Not only did he see this as a drain on time and resources, which volunteers do not necessarily have to the same extent as larger organisations, but it is very difficult when proposing relatively new ideas, for which there is not already an established evidence base.
Involvement in the Process as a Whole

Some organisations felt that the process did not facilitate their involvement. One consultant working with a community group thought that ‘additional help ought to be made available to community groups, such as one to one meetings with EiP Panel inspectors prior to the EiP’. A representative of a Town Council felt that ‘... the involvement of Parish/Town/Community Councils should be earlier, and as a matter of course’. Even statutory consultees, in this case a borough council, had difficulties inputting:

We felt, and still feel, that direct opportunity for involvement was not there. We had one opportunity and the debate was too stringently controlled. We had no opportunity to put our key issues forward directly.

A Government Agency, which was not directly involved with land use planning, also commented that ‘... the process was geared towards specialists (planners/policy specialists) and difficult for smaller, non-specialist organisations to access’.

Several of these comments reflected a sense of frustration with the process, adding to that expressed elsewhere in the questionnaires. These came from a range of organisations. One large regional organisation dealing with culture felt that ‘the process is generally impenetrable [and] no constructive attempt was made to demystify it’. A representative of a small NGO commented that the whole process was ‘... despicable, forced and fixed’ and was in breach of the ‘government’s continuous shouting from the roof tops’ about community consultation. A planner in a city council was, however, more positive about the process:

The approach adopted by the NWRA was open and inclusive. The NWRA were open to change and were anxious to accommodate local authority concerns.

However, this respondent also recognised that the debate needed to be restricted due to the number of respondents involved and that places therefore tended to go to the larger Metropolitan Authorities and campaign groups, even when they were reflecting the comments made by other groups.

Relationship Building

More positively, one respondent, from a utility firm, felt that the process itself was a way of improving their relationship with other regional players. As a provider of water, they wanted to be better integrated into discussions on planning rather than being expected to simply react to decisions that had already been made. This, the respondent felt, was positive outcome of the process:

The realisation of our importance gradually evolved during the process... A lot of planners, planning authorities think that [because] the water act says you should provide water services, they don’t have to tell [us] anything about it because we just have to provide it. What they don’t realise is we need to know when and what they’re going to do so we can plan ahead and also get the funding.

We wanted to influence the relationship between planning authorities, developers and customers in order that we can enable development rather than cause problems in not having capacity... It was to encourage communication between all those parties... It’s been really successful.

Interviewer: ‘So it’s actually been a useful process for you to be networking with the people you need to be communicating with?’

‘Absolutely, yes.’

Integration Across Other Strategies

Respondents were asked if they were involved in other regional strategy development and, if so, how the RSS related to these. Thirty-two indicated that they were involved in other such strategies. Table 5.3 summarises their answers to this section.
<table>
<thead>
<tr>
<th>Question</th>
<th>Yes (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>D2 Were RSS related issues/concerns reflected in these other strategies?</td>
<td>26 (81.3%)</td>
</tr>
<tr>
<td>D3 Were the issues and concerns from these strategies reflected in the RSS?</td>
<td>25 (78.1%)</td>
</tr>
<tr>
<td>D4(a) Did you attempt to make relevant links between these strategies in terms of your inputs to RSS?</td>
<td>29 (90.6%)</td>
</tr>
<tr>
<td>D4(b) Did you attempt to make relevant links between these strategies in terms of your inputs to strategy formulation processes?</td>
<td>25 (78.1%)</td>
</tr>
</tbody>
</table>

Table 5.3: Involvement with other Regional Strategies (numbers and percentage of those responding to section)

As is clear from this table, those who were involved with other strategies - which is about half of those who were involved with the RSS consultation (Group D) - were likely to attempt to make links to those strategies in their response to the RSS and also likely, although to a slightly lesser extent, to make links to the RSS in their involvement in the other strategies. Such respondents were involved with a diversity of other strategies/policies:

- Bus and Coach Strategy
- North West or North East Sub-regional strategy
- West Cheshire and North East Wales Sub-Regional Spatial Strategy
- Bus Policy
- North West Regional Freight Strategy
- Regional Economic Strategy
- Lancashire LTP2
- Pendle Local Plan
- Lancashire Rail Strategy
- Lancashire Economic Strategy
- Northern Way Strategy
- Network Rail Rail Utilisation Strategy
- Pendle Sustainable Community Strategy and Local Development Framework
- Regional Housing Strategy
- Friends of the Peak District
- Retail Hierarchy
- Lake District Economic Futures 'Work'
- Regional Sustainability Strategy
- Action for Sustainability
- Consultation of local communities
- Transport Infrastructure Prioritisation
- Housing Policy
- Local Development Framework
- Linkages between transport policies and land use policies
- Neighbouring RSSs
- Northern Way

Table 5.4: Other Regional Strategies with which Respondents were Involved

The respondents were asked to compare how their experience with the RSS compared with their involvement in the other regional strategies. These are summarised in table 5.5:
viewing RSS negatively (6) viewing RSS positively (11) neutral or no comment (15)

- more rigid
- longer and more complex
- less meaningful and participative (than the RES in particular)
- just as poor
- more peripheral
- ‘in a word daunting’
- useful process but ‘so tightly defined it sometimes feel constructive’
- the RES stakeholder engagement and writing panels were much more open
- other strategies were better in terms of involvement (e.g. RES)

- fairly straightforward, due to overarching strategy
- more opportunity at various stages of the RSS
- there was more opportunity to participate in the RSS process (than the RES or Northern Way City Regional Development Programme)
- more straightforward but also had more direct response
- easier engagement
- this RSS was ‘probably more systematic’
- far better with RSS
- much more comprehensive in RSS

- after spring 2005 the RSS (and the RES) took place ‘at a distance’ from the promoting bodies

A number also pointed out that, due to its statutory nature, RSS is different to many other regional strategies and therefore difficult to compare.

Table 5.5: Comparison of Involvement in RSS with Other Regional Strategies (number of responses in parenthesis)

Respondents were also asked if there were any aspects of their experiences with these other regional strategies from which those carrying out the RSS process could have learned. A few made suggestions:

- Having a named officer to speak to and communication directly by phone and/or email.
- Advisory groups, co-ordinated events, writing panels.
- Regular, ongoing opportunities for discussion, as a constant, interactive process.
- Simplify governance and procedures and too many strategies.
- Working with specific interest groups.
- ‘The NWRA need to listen more!’.

The Different Stages of the RSS

At the start of each questionnaire section that dealt with a particular stage, we asked respondents about the extent to which they were satisfied with the consultation and participation process at that particular stage. This section summarises their quantitative (closed) questionnaire answers. An analysis of the qualitatively based (open answers) answers and associated interview responses on this topic is provided on a stage-by-stage basis later in this section of the report.
### Perceptions of Satisfaction by Stage of RSS Process

<table>
<thead>
<tr>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
<th>Stage 4</th>
<th>Stage 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issues consultation and discussions with identified groups</td>
<td>Informal consultation on options for key strategic elements</td>
<td>Information consultation on interim draft</td>
<td>Formal consultation on submitted draft</td>
<td>Examination in public (EiP)</td>
</tr>
<tr>
<td>Not at all Satisfied</td>
<td>2</td>
<td>1</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>6</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>12</td>
<td>12</td>
<td>11</td>
</tr>
<tr>
<td></td>
<td>16</td>
<td>12</td>
<td>12</td>
<td>12</td>
</tr>
<tr>
<td>Very Satisfied</td>
<td>1</td>
<td>3</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Dissatisfied %</td>
<td>20.0</td>
<td>20.6</td>
<td>23.5</td>
<td>21.6</td>
</tr>
<tr>
<td>Satisfied %</td>
<td>48.6</td>
<td>44.1</td>
<td>41.2</td>
<td>48.7</td>
</tr>
<tr>
<td>Total number of respondents</td>
<td>35</td>
<td>34</td>
<td>34</td>
<td>37</td>
</tr>
</tbody>
</table>

Table 5.6: Satisfaction across the Five Stages (presented as Likert scale answers and summary percentages)

![Figure 5.1: satisfaction across the five stages (see also table 5.6)](image)

Few respondents felt ‘very satisfied’ in any of the stages, but equally few were ‘not at all satisfied’. For most of the stages, most of the respondents were ‘satisfied’. The greatest level of satisfaction is reported in respect of the EiP (stage 5). This would fit with the recorded results on perceived influence (see below), in which perceptions on stakeholder influence is also seen to be higher in stage 5 than any others.
We attempted to break these figures down further to investigate the way satisfaction changed by stages across each of the stakeholder categories (regional representative body, other government body etc.) However, due to the relatively low numbers of respondents in each category, the figures were not very useful or reliable when broken down to this level. Generally, the figures do not seem to indicate any significant differences in satisfaction across the stages by category of respondent. We also asked whether there were issues that were not satisfactorily addressed:

<table>
<thead>
<tr>
<th></th>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
<th>Stage 4</th>
<th>Stage 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>12</td>
<td>13</td>
<td>13</td>
<td>18</td>
<td>13</td>
</tr>
<tr>
<td>Yes</td>
<td>20</td>
<td>11</td>
<td>8</td>
<td>11</td>
<td>11</td>
</tr>
</tbody>
</table>

Table 5.7: Number of Respondents Perceiving that One or More Issues that were not Satisfactorily Addressed

Figure 5.2: Perception of Issues not Satisfactorily Addressed (see also table 6.2)
Perceptions of Stakeholder Influence

We asked respondents to consider the extent to which they considered their involvement to have influenced the emerging RSS:

<table>
<thead>
<tr>
<th></th>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
<th>Stage 4</th>
<th>Stage 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>issues consultation and discussions with identified groups</td>
<td>8</td>
<td>9</td>
<td>8</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td>informal consultation on options for key strategic elements</td>
<td>11</td>
<td>8</td>
<td>6</td>
<td>8</td>
<td>5</td>
</tr>
<tr>
<td>information consultation on interim draft</td>
<td>8</td>
<td>14</td>
<td>14</td>
<td>9</td>
<td>5</td>
</tr>
<tr>
<td>formal consultation on submitted draft</td>
<td>9</td>
<td>2</td>
<td>4</td>
<td>12</td>
<td>8</td>
</tr>
<tr>
<td>examination in public (EiP)</td>
<td>4</td>
<td>1</td>
<td>4</td>
<td>2</td>
<td>5</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th></th>
<th>Not influential %</th>
<th>Influential %</th>
<th>Total respondents</th>
</tr>
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<td>No influence</td>
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<td>50.0</td>
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<tr>
<td>Not influential</td>
<td>38.9</td>
<td>39.5</td>
<td>36</td>
</tr>
<tr>
<td>Influential</td>
<td>30.8</td>
<td>36.8</td>
<td>38</td>
</tr>
<tr>
<td>Total respondents</td>
<td>40.0</td>
<td>40.3</td>
<td>30.00</td>
</tr>
</tbody>
</table>

Table 5.8: Perception of Influence Across the Five Stages (expressed as Likert scale answers and summary percentages)

It is clear from table 6.3 this that stakeholder perceptions of influence are relatively low for each stage. Few people were confident that they had a significant influence at any stage. Only at the EiP stage was the number of people who feel they were influential very slightly higher than the number of those who didn’t. It is noticeable that few people felt that they had any significant influence during stage 2, but the number of respondents feeling influential climbs through stages 2 to 5. Overall, respondents appear to feel more influential in the more stages 4 and 5, which are the more formal of the stages.
We attempted to break these figures down to investigate the way perceptions of influence changes across each of the stakeholder categories (regional representative body, other government body etc.). However, due to the relatively low numbers of each category, the figures were not very useful when broken down to this level. Generally, the figures did not appear to indicate any significant differences in perceived level of influence across the stages. There was some suggestion that the ‘infrastructure / transport business / business association’ category felt slightly less influential as the process went on, whereas ‘local neighbourhood groups’ felt more so. However, the relatively low numbers of responses in these two categories make any conclusions from this data unreliable and can only point the way to further research. Despite some groups appearing more satisfied than others, overall satisfaction levels stay close to the average throughout. This, however, does not reflect the strength of feeling expressed in some of the comments of respondents outside of these quantitative questionnaire responses.

Analysis in the next section of this chapter discusses the open ended questionnaire and interview responses in greater depth on a stage-by-stage basis.

**Qualitative and Interview Responses**

**Stage 1: issues consultation**

In Stage 1 (Issues) respondents that answered the question ‘with which aspects were you most satisfied?’ cited both the web consultation and the availability of hardcopies on request; the stakeholder conference and general bringing together of stakeholders; the information supply including the NWRA explanation of the parameters; and that the NWRA was transparent in its decision-making. The web consultation and the stakeholder event to gather ideas were highlighted as good practice.

Reasons that respondents gave for not being satisfied included not being invited to workshops; feeling constrained in terms of what they could say; feeling that there wasn’t clarity between purpose and process; a feeling that they should have been involved more and their views more listened to; and a lack of acknowledgement of their postal response. Additionally, one respondent mentioned that the exercises presented were ‘too hypothetical’ and they would have preferred them to be real world examples. This comment was received by someone who had indicated in their answer to question B that they were a member of a specific task and working group. Issues considered not to have been satisfactorily addressed included the loss of wildlife sites from the structure plan not being replaced in the RSS; the lack of responses to sustainable transport development, particularly rail, compared with roads; and the Northern Way strategy which one respondent felt was ‘evolving behind closed doors’.

![Figure 5.3: Perception of Influence Across the Five Stages (see also table 6.3)](image-url)
with no discussion allowed' even at the PET Key Priority Group. Also mentioned was housing in Cheshire and Cumbria; waste issues (which, according to this respondent improved a little via engagement but significant concerns remained); key service centres; and the absence of explicit acknowledgement of limited sustainable transport options for community uses, particularly in the evenings and at weekends.

Stage 2: informal consultation on key strategic elements

In Stage 2 (informal consultation) some respondents were satisfied with the web consultation; the level of information supply; the workshops; and the Dialogue by Design team who were described as ‘very helpful’. One respondent was impressed with the speed at which information was put online. However, one negative aspect was the lack of knowledge on the RSS by other participants and a lack of direction on sub-regional advice. To some, the workshops appeared uninfluential and the task groups seemed poorly co-ordinated (of course not everyone was in the same task group). One respondent felt that there was too much emphasis on web consultation in the early stages.

In Stage 2, the issues identified as not having been fully addressed included employment land allocations not reflecting the reality of the employment land provision in Cumbria and the lack of recognition of a specific geographical area’s potential (Preston). One respondent mentioned that she had asked to attend a workshop but was not allowed to do so, in spite of her remits covering the areas mentioned. She also felt that her comments about the ways the consultations were being carried had been ignored. In terms of influence, two of the respondents reported having been able to make changes in the wording on particular matters at this stage.

Stage 3: informal consultation on interim draft

In the section on stage 3 (interim draft) many respondents made comments on substantive issues in the RSS. For example, one felt that there was a ‘lack of real interest’ in the future needs of Cumbria and was dissatisfied with the use of Cumbria and North Lancashire as a sub-region, suggesting instead the use of the (five counties based) sub-regions that the North West Development Agency use. One felt that the links between transport and land use policy were not well addressed, and another that the Northern Way remained an unresolved issue. One commented that there was little recognition of the importance of culture.

In terms of the use of web-based elements at this stage, many of the comments were positive. The online system of communication was very logical and user-friendly and was set up in a clear and simple way. One person, however, felt that there has been too much concentration on web-based materials. One, a representative of a voluntary sector organisation, reported that they had been allowed to send and receive materials in hard copy due to problems with gaining web access. Satisfaction was not, however, unanimous: one respondent felt that there was too much concentration on web-based communication.

The workshop sessions and opportunities for face-to-face contact were generally viewed very positively, although one respondent thought that workshop implementation was not very focussed and that questions were left unanswered. Another commented that sometimes the large numbers of participants at some of the workshops reduced individual opportunities for input.

A representative of the ‘other Government body or agency’ category felt that too many assumptions were made about the level of knowledge that the consultee organisations possessed, whilst another felt that the RSS document was difficult to follow. One person, from a voluntary organisation, felt that there was insufficient time to study the documents and formulate responses. There was, it was felt by one, insufficient time to give feedback and this was made worse by the fact that it was undertaken over the
summer. Another, a volunteer in a campaigning organisation, was vocal about the time pressures that consultees were put under:

The timescale was ludicrously short to react to a draft RSS that had been completely re-written and the problem of fitting responses within a limited number of characters...The fact that whilst the consultation was still ‘live’ a group of ad-hoc stakeholders were assembled and effectively asked to endorse the version of the draft RSS which went to government.

A number of respondents felt that insufficient feedback was given as the consultation went on. This made it difficult to ascertain how influential particular comments had been, and led them to suspect that their comments had not been taken into account. Despite this, some respondents were able to give examples of where they felt they had been influential or not. One respondent felt that they may have influenced the RSS to include more on social outcomes; another had been able to bring recognition to the importance of liaison with utility infrastructure providers; another had been able to influence the understanding of appropriate strategic transport networks. One had felt influential over the city-region agenda and the issues of green infrastructure, contaminated land and waste, noting that the degree of perceived influence varies across these issues. A business association had felt influential over the freight strategy. However, issues that one respondent had with the Sustainability Appraisal were perceived by them to be unresolved.

Stage 4: formal consultation on submitted draft

In Stage 4 (formal consultation on submitted draft), issues raised by respondents included a lack of adequate time to consider and prepare responses to the draft RSS; the parameters of the RSS not being well explained; written responses not being taken seriously; and not being offered a place at the EiP. On the other hand, presentations were, in general, seen to be good and consistent and the workshops were very participative. There was also a roundtable discussion with experts from Government and NWRA which was found to be helpful. However, one person felt that this element of the consultation was ‘too late and appeared to be a conscience-salvaging exercise on the part of the NWRA’. Although ‘having a workshop to contribute to the stakeholders’ responses was very useful’, it also, reportedly, was not made clear how issues raised at this stage were going to be taken forward to the EiP and several respondents felt that it was not clear at the end of workshops whether findings had been taken forward and valued. There also was a problem with obtaining clarification on whether specific individuals would be invited to the EiP. One respondent expressed a more general feeling that his views had not made any impact, despite being assured by ‘someone with a wider overall view’ that they had been viewed ‘sympathetically’.

Many of the comments reflected the view that there was little evidence that the original positions of the NWRA were changed or moved on/away from. This is coupled with observation from several that it was difficult to get feedback throughout the process to in order to find out whether representations had had an influence or had been taken on board. Many would therefore have found this question difficult to answer. One felt that it seemed as though the public were being treated as an irrelevance.

One person, in interview, expressed concern that the forms to respond to the draft RSS were limited. If respondents were to stick to the form they had to either object or accept, and address each of the polices they were interested in turn. This made it difficult to make more general comments. The blanket term ‘objection’, it was observed, was not useful when, in effect, the objection could range from a suggested amendment of one word to the wholesale rejection of a policy.

In Stage 4, issues that were highlighted as not satisfactorily addressed included evidence for housing requirements; cross boundary issues with East Midland and Peak District National Park, particularly with respect to transport; production of a regional flood risk appraisal; a failure to see ‘culture’ as anything more than built heritage, which was perceived to be a narrow interpretation of ‘spatial’; and the
economic impact of active faith communities, which was felt to be ‘largely overlooked’. In terms of influence, one respondent added that they had managed, through their involvement, to obtain clearer recognition of cross boundary relationships.

Stage 5: Examination in Public (EiP)
For the section of the questionnaire relating to the Examination in Public (EiP) stage we included some additional quantitative questions (see table 6.4).

<table>
<thead>
<tr>
<th>Question</th>
<th>Number of ‘yes’ responses</th>
<th>% of people taking part in this stage (as stated in table 4.1)</th>
<th>Number of respondents answering the question</th>
</tr>
</thead>
<tbody>
<tr>
<td>Were there any concerns that you raised that were not satisfactorily addressed during the EiP?</td>
<td>11</td>
<td>30.6</td>
<td>24</td>
</tr>
<tr>
<td>Were you happy with the choice of topics/participants at the EiP?</td>
<td>15</td>
<td>41.7</td>
<td>26</td>
</tr>
<tr>
<td>Was your organisation invited to participate in the EiP?</td>
<td>23</td>
<td>63.9</td>
<td>29</td>
</tr>
<tr>
<td>If your organisation was not invited, did you request an invitation?</td>
<td>11</td>
<td>30.6</td>
<td>14</td>
</tr>
<tr>
<td>If so, were you successful in obtaining an invitation?</td>
<td>6</td>
<td>16.7</td>
<td>9</td>
</tr>
<tr>
<td>If you were not invited to attend, do you feel that your representations were adequately addressed by EiP?</td>
<td>7</td>
<td>19.4</td>
<td>12</td>
</tr>
<tr>
<td>Did you make use of the document library that was prepared for the EiP?</td>
<td>27</td>
<td>75.0</td>
<td>31</td>
</tr>
<tr>
<td>Did you refer to the representations on the EiP Internet Site?</td>
<td>26</td>
<td>72.2</td>
<td>31</td>
</tr>
<tr>
<td>Did you make use of the list of representations posted on the EiP Internet Site?</td>
<td>24</td>
<td>66.7</td>
<td>30</td>
</tr>
</tbody>
</table>

Table 5.9: Perceptions of the EiP (expressed as absolute numbers of responses and as a percentage of the number of people involved in the EiP)

Aspects highlighted as good practice
Respondents were asked what they considered to be good practice in the EiP. There was a clear sense that the pre-inquiry preparatory meetings and seminars were very useful in providing background explanation of process and guidance on issues arising during the EiP. One respondent felt that these were a good way to resolve misunderstandings before the EiP itself. One respondent commented on the use of the Internet; praising the fact that all submissions were accessible and that it was possible to analyse them. Another noted, however, that no acknowledgement was given after submitting responses
through the Internet. Some felt that the Internet had been relied upon too much, highlighting the need to consider those without access, or with only limited access.

**Perceived influence during the EiP**

Levels of influence were difficult to assess, mainly because at the time the questionnaires were sent out, the ‘results’ of the whole process were not yet determined. However, some felt that their participation had been influential. Some quoted specific examples of policies that they had influenced, including economic development in inner cities; potable water saving; planning liaison; employment land availability and housing land allocations. One respondent, a representative of an ‘environmental or other interest group’, commented in more general terms:

> [the] panel have supported more succinct vision and focussed objectives, [giving] greater emphasis on sustainable communities and social outcomes.

Another, a respondent from a regional transportation team, was confident that the panel had given ‘almost universal support for issues we raised in the EiP, leading to policy redrafts culled from our evidence.’ This same organisation felt that many of the ‘problems’ they had wanted to raise had been ‘resolved’ before reaching the EiP stage because they had a ‘good relationship with transport officers’.

**Satisfaction, choice of topics, and resolution of potential areas of conflict**

Comments generally reflected satisfaction with the way that the EiP sessions were conducted and organised. One respondent noted the ‘… polite and considerate manner in which the chairman and inspector at the EiP allowed and encouraged ordinary participants’. Some felt that the EiP sessions worked well, but many expressed frustration at the constraints on debate: for example, a shortage of time and there being too many people around the table for it to be possible to have a detailed discussion:

> Far too many round the table, and only one or two involved in each bit of participation – consequently no debate just reiteration of a stance.

This led to concerns over the effectiveness of the process:

> ‘Given the strategic importance of RSS, the lack of detailed debate at the EiP was very worrying. Everything seemed to be dealt with in a cursory manner.’

In particular, one respondent felt that there was insufficient time for a focus on sub-regions and other topics and their ability to submit evidence was curtailed. A representative of a city council felt that there was not enough opportunity for smaller local authorities to present their case. A representative of a local planning authority observed that there were a number of representations that could have been joined together rather than several participants each having individual seats. Whilst one person felt that it was positive that environmental NGOs were represented in each of the sessions, another felt that the sessions were often disproportionately dominated by one or two interest groups. It should be borne in mind that not every respondent was at every session of the EiP, and that the range of opinions may reflect differences between the sessions.

Some respondents had been denied a seat at the EiP without having been given (in their view) adequate explanation. Several, however, accepted that this had to be the case given the practical constraints on the exercise. Two smaller local authorities found that they could express their views at the EiP through their county councils, who were in attendance. Fortunately their views and those of the county council were not in conflict. A local authority representative commented in interview, however, that although their opinions did not differ substantially from those of the their perspective County Council, their priorities did – i.e. they were not necessarily prioritising the same issues to bring to the debate. Chester City Council took advantage of the opportunity to speak on sub-regional issues, by
putting together a joint case with Preston and Carlisle. The NWRA were found to be supportive and open to this approach and it was felt to be ‘reasonable compromise’ given the time and resource pressures on the process. This is an example of local authorities coming together because of shared issues, in this case related to spatial policies on retailing, rather than immediate spatial proximity. Joint representation on the latter could potentially be achieved through a shared County Council, the former could not.

One company (as mentioned earlier under ‘silo thinking’) had asked to be part of the waste discussions, because their operations had a connection with the issue but were declined without explanation. A local neighbourhood group also felt ignored despite being invited to participate. In answer to the question on satisfaction they had replied ‘being involved’ and, in answer to the question on dissatisfaction, they had replied ‘being ignored.’ They felt that their evidence base was ‘better than most’ and their ‘conclusions sound’ but their views were still ignored and not referred to in the subsequent Panel Report. Their issue related to housing allocations in a local area which the panel felt to be ‘about right’ and no further explanation was given.

Another respondent believed that ‘as the trade body for [a transport related] industry we have had more involvement’ and also commented that it seemed difficult for someone who had made critical comments earlier in the process to make further comments. In fact, a lack of representation on transport was noted by several respondents. Participants from the rail industry, for example, were noted to have been conspicuous by their absence. There was, a regional transport campaigner pointed out, no debate on the Aviation White Paper – this was ruled out – and cycling was not addressed as an issue for debate. Neither was tourism. A cycling campaigner observed that:

There was no one to represent adequately cycling or walking. It seemed to be considered that representatives of other transport or environmental bodies could do this.

This campaigner felt that someone with specific knowledge about cycling issues would have been more beneficial. Where empty seats were seen at EiP sessions, due to absences, some were frustrated that these seats could have been filled with some of the ‘gaps’ identified, such as those representing walking and cycling.

Similarly, the housing debate reportedly didn’t feature groups that are involved in the delivery of housing, such as registered social landlords and ‘lacked an idea of how policy would be implemented. The housing and homelessness charity, Shelter, it was explained in a research interview, were there and were able to put across a strong case for tackling homelessness and the effect of it on people’s lives, but when asked how they would go about planning for more housing, they said they had to admit they did not know as they were not planners, and the debate simply moved on. The interviewee could have dealt with the issue but was not invited to contribute to that part of the EiP. The house builders and CPRE were there, but no-one was able to talk about the planning issues involved.

An interviewee from a Cumbrian local authority felt that the one day allocated to talking about issues in Cumbria and North Lancashire was insufficient. They also felt that the distinctiveness of Cumbria had not been fully recognised; particularly the extent to which it relates to the North East region almost as much as the North West. Another unresolved issue was a conflict within the central Lancashire city region and, according to the local planning authority, that when they raised it as an issue, no explanation was given as to why it was left unresolved. Another commented, however, that there was good cross-boundary work between Greater Manchester and Merseyside. Another issue, mentioned by a cycling campaigner, is that it was not clear whether representations to the draft submission consultation had already been dealt with, and the issue resolved, and therefore if there was a need to try to get a place at the EiP. This is an important issue for voluntary sector campaigners whose time is relatively limited and prefer to focus their energies where they perceive it to be needed.
7. Summary

Our research, through questionnaires and interviews, has explored the stakeholder experience of being involved in the formation of the revised Regional Spatial Strategy in the North West. The study has highlighted a number of issues, both positive and negative, which we summarise in this section.

On the whole, the mixture of workshops and discussion groups, website forms and more conventional written responses seem to be well received. However, some of our respondents had specific issues and experiences with these various consultation mechanisms, from which future stakeholder involvement and consultation work could learn. Where relevant, potential lessons and recommendations have been listed below.

1. Understanding and Awareness of the RSS process

Whilst the majority of our respondents who were involved in the RSS consultation were confident that they had understood the RSS process, the main reason given for not being involved was having insufficient information to understand the RSS process, and the regional planning process more generally. Many had not heard of the RSS until our questionnaire arrived.

Respondents are fairly evenly divided in terms of satisfaction in their quantitative answers. It is noticeable that the most dissatisfied were the ‘other local Government’ category whilst the most satisfied were local planning authorities. In particular, representatives of the ‘other local Government’ category (which mainly consisted of parish councils) were particularly vocal in their comments about their lack of awareness of their opportunity to input and, where they had been able to take the opportunity, of the amount of information that needed to be read and the difficulty in understanding all the terms. In particular, one commented that it would have been useful to have a quick indication of how the plans in the RSS were likely to affect their particular localities. There is clearly a feeling of disenfranchisement that has been expressed, by the smaller groups in particular. This highlights the challenge of involving smaller, local groups in regional decision-making, when their focus is primarily local.

Some felt that the policies were inconsistently presented in the draft submission document. Whilst this may seem like a superficial issue, in light of the difficulties faced by some individuals and smaller organisations, the way that the policies are presented could determine whether or not it is read.

- Provide better information on how the regional planning process functions, why it is important, and how individuals and organisations can get involved.
- Improve the presentation of consultation documents, including a glossary of terms and abbreviations, and avoid unnecessary jargon and ‘Government speak’, particularly where no explanation is given.
- Ensure wide coverage of notifications of opportunities to participate (newspaper advertisements, etc.), with the aim of increasing awareness and including as diverse a range of individuals and organisations as possible.
- Ensure consistency in how policies are presented, with an aim of making them accessible to those without expertise in the planning system. Include appropriate cross referencing between policy areas.
- Provide information that is prepared with the lay person and local organisations in mind. For example, provide summaries for local areas (e.g. for small parish councils who want to be able to quickly find out how it affects them)
- Include information summaries on how regional policies are likely to affect specific localities.
Hold briefing and consultation events in a wide range of locations across the consultation areas, in this case the North West region.

2. Timetable and Process
Several felt that the process was too rushed and that the timetable imposed on the process was detrimental to the product as a whole, and that this had been a cause of ‘gaps in the evidence-base’. There was an issue with continuity in the process, which appears to have been caused by pressure from central government as timetables were changed nationally. This issue was exacerbated by insufficient information being fed back to the participants. The requirements in relation to assembling the evidence base was also an issue for concern. For one voluntary campaigner, this was an unwanted burden due to the amount of research that he needed to do in order to be able to make his point.

- Review whether written consultation stages provide adequate timescales for full responses.
- Update participants as changes to timetables occur, endeavouring to provide full explanations for changes.
- The impact of the evidence base requirement needs to be considered and researched further, particularly in terms of its effect on those with limited resources.
- Emphasise that participants without professional planning experience can take part, and their inputs will be valued, to avoid people feeling put off by the level of expertise displayed in other responses.

3. Forms of Stakeholder Engagement
Although many raised issues relating to it, the web-based element of the consultation was on the whole welcomed by the respondents. However, not everyone was comfortable with using the web for the consultation and some had difficulty accessing the technology. For one organisation – and it could be expected that other similar organisations had similar experiences - it was also problematic when it came to getting responses signed off by several officers. From the point of view of those carrying out the consultation, using the web system was particularly advantageous in that it was possible to sort through the information more quickly, enabling the process to progress more quickly than it might otherwise have been able to. In order to get the data in an easy-to-manage format, however, it was necessary to put constraints on how comments were submitted. This was the subject of some concern amongst our respondents, who highlighted the character limit on responses in the early stages and the fact that responses in the latter stages had to be submitted as either ‘support’ or ‘objection’ but sometimes didn’t happily sit in either category. The respondents’ comments also highlight that there is a need to consider very carefully how using such a system may affect the abilities of the general public to get involved. Whilst, in theory, helping to keep the consultees well-informed, one campaigner had found it off-putting to see the responses from others placed on the website, because he felt that they had more background than him and was concerned that their responses would carry more weight as a result.

Several respondents felt that there were problems with ‘silo thinking’ and two respondents in particular had difficulties getting their views across on a particular policy area because of this. The consultation organisers had placed them in a particular workshop group and that meant that, although this group was appropriate for almost all of their concerns, there was one issue that they were not able to voice within this group and the issue was therefore not satisfactorily addressed. However, at least one of the respondents found the process useful in terms of networking, making new contacts, and getting his organisations’ concerns recognised by others.
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o Continue to provide a mix of approaches including more innovative, hands-on methods of engagement such as working groups, workshops, face-to-face meetings with as wide a range of stakeholders as possible.

o Provide additional support to groups who need it – be prepared to organise seminars/meetings on their ‘patch’ and at appropriate times of day (including evenings/weekends if appropriate).

o Introduce a ‘helpline’ facility to deal with inquiries about the RSS process generally and the use of the web system.

o Review the advantages and disadvantages of a rigid input format/character limit – is there any hybrid/compromise that could be used (e.g. standard forms plus ability to submit supplementary material if requested)?

o Accommodate the need for organisations to get appropriate ‘sign off’ on their electronic responses.

o Provide paper alternatives for those with no (or very limited) web access.

o Build flexibility into the process to ensure that organisations can address issues that are outside of their assumed ‘silo’.

o Retain, and build upon, the networking opportunities in the process. These may be a way to encourage further people to become involved in the process.

Although over half of the people answering the question said they were either ‘satisfied’ or ‘very satisfied’ with the EiP (stage 5), a range of issues were raised about it. Some felt that the relatively high number of people and tight timescales meant that there was insufficient scope for debate. Some had specific issues that they felt were not given enough time; one of these was walking and cycling. In fact, transport was recognised to be an area with a lack of representation, particularly from the bus and train operating companies. Another remarked that there was insufficient ‘planning’ expertise represented in the housing debate. Some respondents had been refused a place at the EiP and then were frustrated to hear from colleagues that there were empty seats. There was again an issue with a lack of explanation being given for their request for a place not being accepted. Some respondents were able to get around the restrictions on the number of places by having an organisation, such as their county council, represent them. This worked in these cases, but there is the difficulty that a local authority may not be entirely in agreement with their county council.

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o Provide reasoning for refusing places at the EiP.

o Make full use of pre-examination meetings.

o Ensure coverage of all pertinent issues.

o Build flexibility in the programme so that topics that arise during the process can be given time for discussion and empty seats can be filled.

4. Feedback and Information Flows

There appears to have been a need for better information flow back to the consultees. Many commented that they found it difficult to plan their involvement and assess their influence without knowing what had or hadn’t been taken on board at any particular stage. In particular, some respondents were unsure if they needed to attend the EiP because they did not know whether or not their suggestions had been taken on board or they needed further debate. This was a particularly important issue for organisations consisting of unpaid people.

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o Ensure regular and comprehensive feedback of information to participants as the process evolves, so they are aware what has happened in respect of their inputs.
5. Relationship with other Regional Strategies
Around a third of our respondents were involved with other regional strategies and the majority of these felt that RSS related issues were reflected in the other strategies and, conversely, that issues and concerns from these strategies were reflected in the RSS. Various suggestions have been received in terms of what the RSS consultation could have learned from other strategies. These include:

- Where possible, link consultation processes (e.g. workshops / topic groups etc.) with those of other strategy development.
- Sharing the evidence-base (including data collection, analysis and monitoring) with work on other regional strategy development
- Working more closely with specific interest groups on a regional and sub-regional basis
- Simplifying governance procedures
References


Further information, including the North West RSS documents, is available at www.nwrpb.org.uk.