

Dear Ariane

Many thanks for your letter, and for following up on my comments about consultation. I've tried to set out my thoughts in a reasonably concise way. Please do get in touch if you would like any further elaboration.

Consultation within the planning process is set within a context of regular 'consultation' exercises by national, regional and local actors on a variety of policy areas, e.g. transport, air quality, regulation of short term lets, Spaces for People, parking permits etc and consultations at different stages of relevant processes, e.g. developing policy; implementation of policy and post-implementation evaluations and feedback.

There is a lot of time and effort tied up in these processes, both in terms of civil servants and officers time, as well as the contributions of members of the public and representatives from interest groups, many of whom are volunteers. It can be overwhelming for citizens, particularly those who wish to participate in the things happening in their neighbourhoods and to be engaged citizens; and, there is a tricky question about what is gained (and lost) in all of this effort.

Frustration with consultation among the public is high, resulting either in non-participation because it's assumed that a decision has already been made, or attempts to 'game' the consultation via multiple submissions. There has always been an element of gaming of course, and many campaign groups provide guidance to supporters about how to respond to consultations, but recent experiences have seen bots used to generate thousands of online survey responses - creating an additional burden for officers to identify and eliminate these from genuine responses.

An alternative:

1. We should stop calling everything 'consultation'! Including and involving citizens happens at different stages, for different purposes and we need to be much, much clearer about these things in the language that we use. All public participation activities should be clear about the purpose of the exercise as well as what can and can't be influenced.
2. The development of policy documents (e.g. development plans) should be supported by **deliberative processes** involving a representative group of citizens involved from the very earliest stages of the process. This might be organised via sortition or citizens juries and should include a children's panel - as children and young people are almost always excluded or overlooked in consultation processes. The climate assemblies and citizens juries that have worked on climate action provide a model for this work. **This deliberative process should replace rather than replicate** outreach via public meetings or exhibitions. Just as we allow juries to represent the community in court trials, we should allow citizens juries to represent the community in policy processes.

3. Given that local authorities are often developing and consulting on multiple policy documents and proposals, there is opportunity to pool efforts and activities. Citizens' juries appointed for a fixed time period (e.g. 6 or 12 months) could be involved with more than one policy area. Where a citizen's jury has been involved in the preparation of a new policy document or plan, then there should be an account of the way in which the jury has influenced and shaped the plan.
4. The move towards representative rather than universal consultation of citizens would also provide an opportunity to engage sectoral stakeholders (statutory bodies, civic societies etc) by involving them as witnesses/contributors to that process.
5. Consultations about implementation e.g. HOW to do something, should not be confused with consultations about WHAT to do. We need to separate these much more clearly so that citizens know if they are being asked what the policy should be, or how the already-agreed policy should be implemented.
6. Some consultation exercises are really attempts to collect data and build evidence and should be framed as such. I suggest that resources for public participation would be well spent by being redirected to regular community surveys collecting and collating data about people's experiences of living in their place. My feeling is that many residents seize on consultation as a way of being heard because the opportunities to share their experiences are relatively few and far between. Regular community surveys could be a powerful tool - but will only have meaning if resources and action follow. In the context of the Scottish Government's commitment to place and 20 minute neighbourhoods, the community level ought to become a more important unit of engagement and understanding.
7. Community empowerment is vital - local place plans could provide a powerful vehicle for community empowerment, enabling communities to discuss their experiences of their place, the issues that they face, and then to develop plans that reflect these experiences and priorities for action. Linking this to other participatory processes, e.g. participatory budgeting would magnify the value of this approach.