



University of the West of England,
Bristol



IMPROVING AIR QUALITY CONSULTATION

A Ten Step Plan for Environmental Consultancies

A Plan Developed from the ESRC Impact Grants Scheme Project

**Mediating Consultation: Private Sector Consultancies Engagement in
Air Quality Consultation**



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This 'Ten Step Plan to improve air quality consultation' guidance document for Environmental Consultancies results from the findings of an ESRC Impact Grants Scheme project entitled 'Mediating Consultation: Private Sector Consultancies Engagement in Local Air Quality Management Consultation' (ESRC Award Reference RES-172-25-0047). This guidance document can be downloaded freely at: http://www.uwe.ac.uk/aqm/Mediating_Consultation.

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January 2009

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1. BACKGROUND

The Environment Act 1995 (part IV) placed an obligation on Local Authorities (LAs) to consult with relevant statutory and non-statutory local stakeholders as part of their Local Air Quality Management (LAQM). This represents one of the largest locally based environmental consultation initiatives undertaken in the UK and was the basis of an ESRC project funded under the Science in Society Programme carried out by the authors entitled 'Consultation as Science Communication? The Case of Local Air Quality Management' (ESRC Award Reference RES-151-25-0044). The research highlighted that LAs frequently employed Environmental Consultancies (ECs) to interface with stakeholders, including the public.

With the award of an ESRC Impact Grant we were able to explore the role of environmental consultancies in further detail in order to gain a better understanding of the air quality consultation services they provided. One of the research objectives was to produce a supplementary guidance document specifically designed for ECs undertaking air quality related consultation.

2. HOW WAS THIS GUIDANCE PRODUCED?

The guidance results from an ESRC Impact Grants Scheme funded research project carried out by researchers from the University of the West of England, Bristol – [the Air Quality Management Resource Centre](#) and [the Science Communication Unit](#). The focus of this research was an investigation of the role of ECs in consultation on air quality matters. We identified a need to explore the support functions provided for local authorities in respect of LAQM but also recognised that the air quality consultation services will be offered to a wider range of potential clients. Consequently we investigated EC service offerings in the areas of public and stakeholder consultation for the air quality aspects of Environmental Impact Assessment (EIA).

A questionnaire survey was distributed to 150 UK ECs that indicated or implied in their promotional materials (marketing literature and websites) that they offered services in public and stakeholder consultation work in one of the

following fields: air pollution/air quality, environmental impact assessment/strategic environmental assessment or corporate environmental strategy. A 33% response rate was achieved. Data from the survey analysis was utilised to structure an agenda for a series of focus group meetings. The focus group was designed as an interaction and knowledge transfer event to share the outcomes of our previous ESRC funded research and for the research team to explore and be informed by the participants' practical experiences in undertaking air quality related consultation. Following two focus group events, three case studies were undertaken to test and confirm the outcomes of the survey and focus group activities. The conclusions of the questionnaire analysis, outcomes of the focus group meetings and the further insights and validation offered by the case studies provide the evidence base upon which this guidance sits.

3. PURPOSE OF THIS GUIDANCE

The purpose of this guidance is to provide ECs with information and tools that will be helpful in undertaking effective consultation on air quality matters – particularly in relation to LAQM and for the air quality aspects of EIA.

This guidance document is divided into two parts. The first part discusses how ECs currently undertake air quality related consultation on behalf of either public or private sector clients. It considers the role of ECs in the consultation process, the purposes of the consultation activity, and also explores the relationship between the ECs, their client and external stakeholders.

The second part of this guidance document presents a model for 'better practice' in air quality related consultation. The model consists of a ten step plan for ECs, focusing on the client and consultant relationship. Our intention here is to provide indicative rather than prescriptive advice to ECs involved in air quality related consultation. Whenever possible this guidance provides generic advice on air quality related consultation and does not differentiate between the types of consultation undertaken.

4. CURRENT CONSULTATION TECHNIQUES

This section considers how ECs in the UK carry out LAQM consultation and the air quality aspects of EIA consultation. It provides diagrammatic representations of the relationships an EC has with its client and their stakeholders, and presents a table of the different approaches and methods used in consultation.

4.1. Roles of ECs and purposes of consultation

We specifically asked focus groups and case study research participants to explain their perception of the role or roles played by an EC in air quality related consultation and to advise on the purpose of the consultation undertaken by an EC for their client.

The roles specified are as follow:

1. In LAQM consultation the role of an EC is identified primarily to be an internal mediator interfacing between the client department and other departments within the LA, and an external interface between the LA, the public and other stakeholders. They are also identified as providing additional capacity and as assisting the LA in the development of the consultation elements of plans and strategies, for example with the development of an Air Quality Action Plan.
2. In the air quality aspects of an EIA consultation the role of an EC is more tightly defined as providing impartial advice in order to address public concerns about the impacts of the proposed scheme on the environment.

According to research participants, the most important purposes of the air quality consultation process undertaken by ECs are:

1. To build communication channels between a client and regulatory bodies;
2. To improve environmental policy decision-making within the client;
3. To help engage the public with the decision-making process;

4. To support achievement of regulatory compliance; and

5. To obtain project approval.

The above purposes are ranked in order of importance according to the results of the questionnaire. Focus group participants and case study interviewees validated the rank order provided by the survey.

4.2. Methods used and stakeholders involved in air quality consultation

The main methods used in consulting local communities in any types of consultation activity are public meetings, public information leaflets, use of questionnaire surveys, workshops to gain views, websites hosting consultation documents with and without feedback mechanisms offering a means of providing a response to consultation questions, and focus groups usually to test the acceptability of proposal or solutions to identified problems. In terms of consultation with internal departments and statutory stakeholders, ECs, with the approval of their client, opted for workshops, focus groups, circulation of reports holding of public meetings, and websites (usually with feedback mechanisms).

Table 1: Methods used in air quality related consultation

<i>Consultation with</i>	<i>Method used in air quality related consultation</i>					
	Use of leaflets	Sending reports	Websites (with feedback)	Survey	Public meetings	Focus groups
Local businesses	•		•	•	•	•
Local residents	•		•	•	•	•
Local authorities		•	•		•	•
Neighbouring authorities		•	•		•	•
County Council		•	•		•	•
Environment Agency		•	•		•	•
Highways Agency		•	•		•	•
Defra		•				

In a public sector LAQM consultation activity an EC is generally contracted by the LA's Environmental Health Department (blue colour in figures below), to provide assistance with an Air Quality Management Area declaration, the preparation of Air Quality Action Plan or an Air Quality Strategy. In such cases ECs consult local communities, internal LA departments, and statutory stakeholders (i.e. neighbouring LAs, Environment Agency, County Council, Highways Agency, Defra, and other relevant stakeholders). Figure 1 illustrates the web of links in LAQM consultation. Blue lines indicate consultant and client relationships. Straight lines are consultation lines, indicating consultation undertaken by ECs on behalf of LAs whilst dotted lines show direct lines of communication between LAs and other stakeholders.

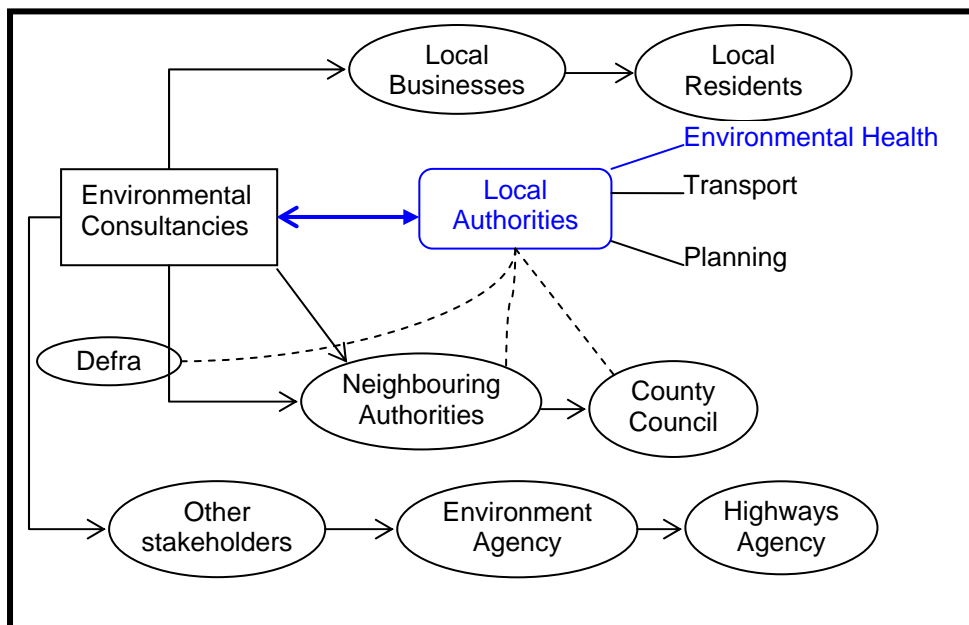


Figure 1: Clients and stakeholders in Local Air Quality Management consultation

For the air quality aspects of EIA consultation, an EC can either be contracted by a private developer or a public sector client e.g. Highways Agency or a County Council in the case of expansion of road networks. In such cases, ECs consult both local communities and statutory stakeholders (i.e. LAs, Environment Agency, County Council, Highways Agency), and other relevant stakeholders. This is illustrated in Figure 2 below.

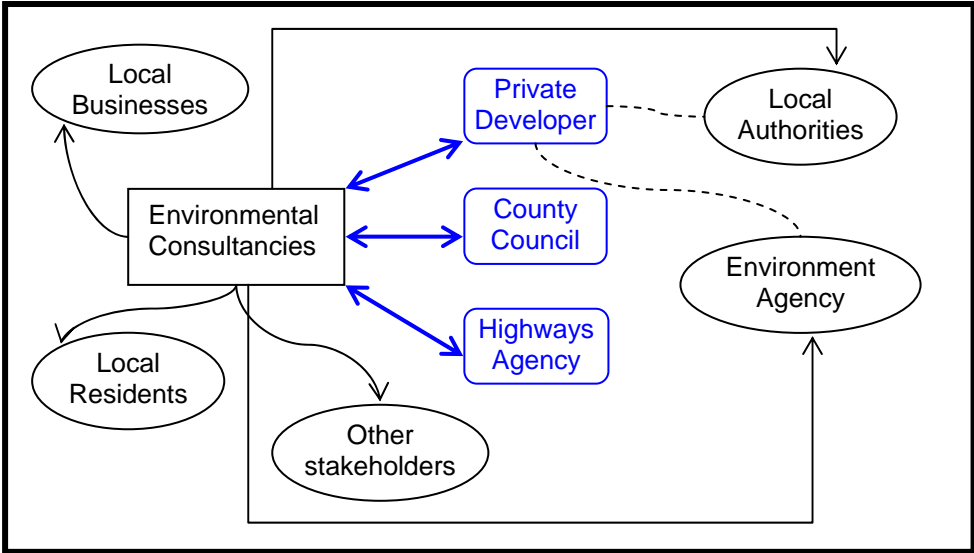


Figure 2: Clients and stakeholders in air quality aspects of Environmental Impact Assessment consultation

4.3. Barriers experienced in air quality consultation

Many of the barriers experienced by ECs in air quality consultation are context specific. A highly important issue in one particular case could be less important in another context. This was specifically highlighted in focus group discussions.

Within the questionnaire and in focus groups and case study interviews we asked ECs about the barriers they faced in undertaking air quality consultation. The five key issues identified by ECs are presented below, where the ECs' concerns are illustrated by selected quotes.

1. Limited time frame to carry out the consultation – *“Being brought late in to the process limited the scope of the consultation methods we could use.”*
2. Financial resources – *“Client wishes exceed the budget.”*
3. Lack of support from the client in defining the scope of the activity – *“Sometimes it is difficult to get a client to engage with us once the contract is awarded.”*
4. Opposition from the public to the project – *“We feel the client only brought us in when problems emerged.”*
5. Difficulty in generating public interest in the consultation – *“We held well advertised public meeting but no one turned up.”*

5. IMPROVING CONSULTATION

This section presents and explores a number of approaches that ECs and their clients may take to improve the process and outcomes of air quality related consultation. It does this by addressing the main barriers identified in section 4.3. The importance of early engagement with a client is identified as an important condition in improving the consultation process and its outcomes. The focus group and case study activities have confirmed the importance of ECs accessing training opportunities in consultation procedures and for the process to be subjected to an evaluation. Our findings suggest that this latter step is often not undertaken by either the EC or its client and thus valuable organisational learning opportunities are being missed.

We have distilled our findings into a ten step plan.

5.1. The importance of early engagement

The limited time frame in which to carry out the consultation was considered as one of the most significant barriers experienced by ECs when undertaking air quality consultation activities. Whilst this is understandable when LA budgets are constrained we recommend that ECs and clients should invest more effort to encourage public and other stakeholder engagement in the development of proposals rather than leaving the consultation to the end when the opportunity to influence the outcome might be diminished. Thus we would encourage upstream engagement of consultees to get a better outcome downstream and thereby maximise the potential to get support from stakeholders including the public. When clients award contracts to ECs at a later stage of a project, it is important for ECs and clients to agree upon the scope and limitation of consultation activity in order to avoid misunderstanding in the future.

Early engagement is an important step to build dialogue and to assist the decision-making process. It can be done by simply providing the information required to inform the decision-making process and alert the decision makers to the possible outcomes of consultation. In the case of consultation undertaken on behalf of LAs, early engagement with Elected Members,

particularly those who represent areas affected by the subject of the consultation, is required. The most relevant stakeholders should be identified at the earliest stage to allow for targeted and better use of scarce resources.

In the air quality aspects of an EIA consultation, it is important for ECs to contact relevant statutory consultees e.g. LAs and the Environment Agency at an early stage of the process. Research participants reported extra assistance received by simply informing the authorities about the scheme at an early stage which resulted in helpful assistance from consultees when problems were encountered, for example in accessing data to support the application. ECs generally consider the concept development stage of an EIA as the most appropriate time for public participation whilst for LAQM consultation, participants opted for the stage before Air Quality Management Area declaration. This is quite late in the process of LAQM and may explain some of the disappointing experiences in consultation reported by ECs and their clients.

There are, however, two risks involved in early engagement i.e. consultation fatigue and raising expectations from consultees. It is important to manage this step effectively for example by incorporating the issue of air quality into other environmental concerns such as climate change and congestion. Translation of science into easily understandable policies for non technical stakeholders and the public is an important component of successful consultation.

5.2. The importance of training and evaluation

The questionnaire survey showed that only 19% of respondents made use of training in consultation techniques to assist them in undertaking environmental consultation projects. Furthermore, the majority of participants did not evaluate the effectiveness of methods used for consultation.

From the questionnaire survey, the top three criteria used to measure the success of a consultation process are:

1. Good feedback from clients;

2. Good feedback on events from participants; and
3. Success in obtaining project approval.

It is important in the process of consultation to evaluate past activities in order to improve the efficiency and effectiveness of future processes. Simple but efficient evaluation techniques such as analysing the quality of responses after a consultation event, both from clients and participants and recording the number of hits on dedicated consultation websites can be deployed. Access to examples of better practice and evaluations of consultation techniques were viewed by ECs as one of the most useful ways to enhance the quality of consultation activities undertaken by ECs.

It is important to carefully document the actions performed throughout the consultation process and specifically those in the lead up to an event. Although in some cases it is difficult to generate community interest in the first place, it is critical for ECs to evaluate how the consultation was undertaken in order to improve the effectiveness of the consultation process they are using.

5.3. A ten step plan to better practice in air quality consultation

We recognise the challenge for ECs in seeking to implement a number of the points in the ten step plan. We suggest that those ECs who are fortunate enough to have a long term relationship with a client may find applying these steps somewhat easier than those just embarking on their first contracted consultation activity. However, even those embarking upon their first consultation event for a client will find some of these steps applicable to their own circumstances

1. Encourage the client to prepare for the consultation process by building internal relationships and communicating in a timely and effective way

It is important to have joined-up working within the whole project team, i.e. LA departments and the consultant if undertaking consultation on behalf of a LA, or the project proponent and the consultant if undertaking the air

quality aspects of an EIA consultation. The consultation requires a unified front.

2. Early appointment of an EC and defining explicitly the roles and responsibility of the client and the EC, and adhering to them

In order to maximise the benefit of an EC to the project, the EC should be brought in at the earliest opportunity so that the advantage of early or upstream consultation with stakeholders (see 5.1 above) might be realised.

The roles of client and each member of the project team need to be clearly defined. These conditions are imperative to deliver an effective and efficient consultation process. Research participants considered this a critical step to get right. Getting it wrong can have significant implications for resource utilisation later on and may adversely affect a successful outcome for the project.

3. Co-definition of the project scope

When an EC is awarded a contract to undertake a consultation project, it is important to engage with the client and internal stakeholders at the earliest opportunity to discuss the project scope, to identify risk factors and to offer a redefinition of the scope if necessary.

4. Provide assistance in locating additional funding sources

This step is regarded as one of the critical mediating points for an EC to provide inputs for clients in terms of resources required for a good consultation process. Often consultation exercises are under resourced and the EC can support their client by leveraging additional resources to support the activity.

5. Advising on the allocation of the project budget

Clients may be inexperienced in the estimation of costs likely to be incurred in the discharge of a consultation process. An EC can play an

important mediating role in advising on the appropriate allocation of the available budget.

6. Early and timely access to information

Research participants agreed that the role of ECs is to filter and present information at the appropriate technical level and in a format accessible to the intended audience. An essential component of this step is evidence of a robust quality assurance and control process being utilised by the EC. The information provision should ideally be in the form of early upstream engagement to seek general agreement before the provision of more detailed information as the options becoming clearer further down stream in the process.

7. Seek opportunities for innovative consultation

Participants agreed that although it is difficult to put this step into practice, there is a potential benefit if air quality consultation can be incorporated into another consultation activity.

8. Maintain engagement throughout the lifecycle of the project

Whilst this may be thought of as particularly relevant for major development applications it is equally important for shorter duration consultations as well. A particular role for ECs that emerged from the focus group discussions was the important role ECs played in maintaining consultation throughout the lifecycle of the project. In these cases ECs were often contracted in a project management capacity as well as having a consultation role. Evidence from this study suggest that the manner in which a consultation is conceived and executed can have a significant impact on the outcome of a project

9. Framing consultation outputs

The role of ECs in this step is to provide an objective opinion, to act as a mediator, and to deliver the consultation outcomes in a presentable format. In the case of Environmental Impact Assessment, consultation

responses from both statutory and non-statutory consultees feed directly into the Environmental Statement.

10. Evaluate and review the form, function and outcome of the consultation process

This is discussed in more details in Section 5.2. ECs should evaluate the effectiveness and efficiency of the consultation process. This step is judged to be of particular importance for consultation on long-term projects or cyclical processes in order to evaluate each consultation event, to judge the success of it as well as to learn from any mistakes and thereby to improve the consultation process.