

Complaint Regarding WECA A4 Bath to Bristol Strategic Corridor – Keynsham Section Consultation

Executive summary

Saltford Parish Council (SPC) has concerns regarding the design and operation of the West of England Mayoral Combined Authority (WECA) consultation questionnaire for the A4 Bath to Bristol Strategic Corridor – Keynsham Section.

The principal concerns are:

- The questionnaire's response scale provided positive response options but no explicit mechanism for respondents to indicate opposition to proposals.
- The questionnaire appeared to be designed primarily for individual respondents rather than stakeholder organisations such as parish councils. Published guidance from Imperial College London's Centre for Higher Education Research and Scholarship identifies the importance of using sufficient response options to capture a wider range of perceptions and ensuring that questionnaire items apply to each respondent.
- Mandatory questions relating to personal travel behaviour prevented Saltford PC from submitting its response online without providing answers that were not applicable to an organisational respondent.

SPC is concerned that these issues may have affected both participation in the consultation and the reliability and representativeness of the consultation evidence generated.

The purpose of this report is not to challenge the transport proposals themselves, but to consider whether SPC wishes to raise concerns with WECA regarding the design and conduct of the consultation process.

Background

The purpose of public consultation is to provide affected individuals, communities, businesses, public bodies and representative organisations with a fair opportunity to express their views and inform decision-making.

Good questionnaire design is relevant to this process because the way questions and response options are constructed can affect the range and quality of information obtained from respondents.

Imperial College London's Centre for Higher Education Research and Scholarship publishes guidance entitled *Best practice in questionnaire design*. The guidance includes recommendations concerning both response scales and the applicability of questions to respondents.

In relation to response scales, Imperial College London recommends using at least five response options per scale to capture a wider range of perceptions. The guidance refers to research concerning the number of response anchors and measurement, including Weng (2004), Nielsen et al. (2017), and Gehlbach and Artino Jr. (2018) (Imperial College London, n.d.).

The guidance also recommends ensuring that questionnaire items apply to each respondent, noting that respondents may otherwise become alienated where an item does not apply to them. This recommendation is attributed to Dillman, Smyth and Christian (2014) (Imperial College London, n.d.).

SPC considers these principles relevant when assessing the design of the WECA questionnaire, particularly in relation to the response scale and questions concerning individual travel behaviour.

Response scale and recording of objections

SPC's principal concern relates to the response options provided within Section 4, "Your thoughts on the proposals".

Respondents were offered four options:

- Very positive change
- Slightly positive change
- No positive change
- No opinion

In SPC's view, these options do not provide a balanced framework for assessing public and stakeholder opinion. Two of the four available responses are explicitly positive, while no response option allows a respondent to indicate directly that they consider a proposal to be negative, harmful, unacceptable, or that they object to it.

The questionnaire therefore provides respondents with two degrees of positive response but no corresponding opportunity to express different degrees of opposition through the principal quantitative response mechanism.

This is relevant in light of recognised questionnaire-design guidance recommending sufficient response options to capture a wider range of perceptions (Imperial College London, n.d.). Research has also examined the relationship between the number of response categories and the reliability of survey measures (Weng, 2004).

The issue with the WECA questionnaire is therefore not simply that it contains four rather than five response options. More fundamentally, the available options do not appear to represent a balanced positive-to-negative scale.

A balanced scale might, for example, include:

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose

or an equivalent positive-to-negative scale.

Such an approach would allow respondents to indicate not only whether they support or oppose a proposal, but also the strength of their view.

By contrast, the term "No positive change" is potentially ambiguous. It could encompass a wide range of views, including neutrality, uncertainty, disappointment, concern or outright opposition.

Respondents who strongly oppose a proposal may therefore be recorded within the same category as respondents who simply believe that the proposal would make little or no difference.

SPC is therefore concerned that the consultation questionnaire is not capable of distinguishing between neutral and negative opinion in a meaningful or measurable way.

This limitation is significant because understanding the range and intensity of views is an important purpose of consultation. Decision-makers should be able to identify not only where proposals are supported, but also where significant concerns or objections exist.

The absence of explicit negative response options raises questions regarding whether the consultation data can accurately quantify the scale of objection to individual proposals. It also creates a risk that consultation findings may understate the extent of concern or opposition when quantitative responses are subsequently summarised.

SPC does not suggest that the questionnaire was intentionally designed to produce a particular outcome. However, the structure of the response options may create a perception that positive responses are more readily captured than negative responses.

Given that consultation findings may subsequently be summarised and reported using quantitative response data, SPC considers the design of the response scale to be a legitimate matter for clarification.

Organisational participation and applicability of questions

SPC also has concerns that the questionnaire appeared to be designed principally for individual respondents rather than stakeholder organisations.

This is relevant to the questionnaire-design principle that item content should apply to each respondent (Imperial College London, n.d.).

The consultation questionnaire largely focused on personal circumstances and individual travel experiences, with the option to identify a response as being submitted on behalf of an organisation appearing only later in the process.

As a neighbouring parish council representing a community directly affected by transport conditions on the A4 corridor, SPC considers itself a relevant stakeholder in the consultation.

More broadly, the A4 is a strategic transport corridor serving multiple communities and administrative areas between Bath and Bristol. Consultation arrangements should therefore be capable of accommodating participation by parish councils, businesses, community organisations and other representative bodies from the outset.

The concern regarding the applicability of questions was reinforced by the requirement to answer certain mandatory questions before an online response could be submitted.

Examples included questions relating to an individual's principal mode of travel and factors that might encourage them personally to use bus services more frequently.

While such questions may be appropriate for individual respondents, they are not necessarily questions that a parish council, business or other representative body can meaningfully answer.

The issue is not that individual travel questions are inherently inappropriate. Rather, where organisations are permitted to respond, the questionnaire should provide a means for them to identify questions that do not apply to them in order to submit an online response, rather than requiring an answer to a question concerning an individual's personal circumstances.

SPC's experience of submitting a response

SPC intended to submit comments under Section 7 through the consultation process and identify its response as an organisational response later in the questionnaire.

However, when SPC attempted to submit its response, it became apparent that completion was not possible without answering mandatory questions that were not applicable to the Council as an organisation.

The questionnaire did not provide a suitable "not applicable", "not relevant", "organisation response" or equivalent option that would have enabled SPC to proceed

without providing answers to questions that had not been considered or resolved by the Council.

SPC was therefore unable to submit its response through the online questionnaire and ultimately submitted its response separately by email and post to ensure that its views were formally communicated to WECA.

SPC notes that email and post were not presented as alternative submission methods on the WECA Have Your Say website for this consultation. SPC is therefore concerned that this created an unnecessary barrier to organisational participation.

Where organisations are permitted or expected to respond, consultation processes should provide an appropriate means for them to do so without requiring answers to questions that are inherently personal or irrelevant to the respondent.

The absence of appropriate alternatives also creates a risk that respondents may provide arbitrary or artificial answers simply to satisfy the technical requirements of the questionnaire. This could potentially affect the reliability of the underlying data.

More broadly, the questionnaire design creates a risk that parish councils, businesses and other representative bodies may have been discouraged from participating or may have concluded that the consultation was intended primarily for individual respondents.

SPC cannot determine whether this occurred in practice, but considers that the possibility is relevant when assessing the representativeness of the consultation findings.

Questions for WECA

Should SPC resolve to pursue a complaint, it may wish to seek clarification from WECA on the following matters:

1. Why no explicit negative response options were provided within the principal assessment questions.
2. Why respondents were not offered a balanced response scale capable of recording support, neutrality and opposition.
3. Whether WECA considered recognised questionnaire-design guidance when determining the response scales used in the consultation.
4. Why a response scale capable of distinguishing different levels of support and opposition was not adopted.
5. Why organisational respondents were not identified at the outset of the questionnaire.

6. Why certain individual-focused questions were made mandatory.
7. Why no "not applicable", "not relevant", "organisation response" or equivalent response options were provided for mandatory questions that may not apply to organisational respondents.
8. How WECA satisfied itself that the questionnaire was suitable for parish councils and other representative organisations.
9. Whether WECA considered the need for questionnaire items to be applicable to all categories of respondent.
10. How responses submitted outside the online questionnaire process will be recorded, analysed and reflected within the consultation findings.
11. Whether WECA intends to distinguish between individual responses and responses submitted by parish councils, local authorities, businesses and other representative bodies when analysing and reporting consultation results.
12. Whether WECA will publish details of how the quantitative response data were categorised and analysed, including how responses recorded as "No positive change" were interpreted.
13. Whether WECA will take account of the possibility that respondents who wished to express opposition may have selected "No positive change", and how this will be reflected in any analysis of the consultation results.

Overall assessment

SPC's concerns relate to the design of the consultation process rather than the merits of the transport proposals themselves.

SPC is concerned that the questionnaire:

1. did not provide a balanced mechanism for recording support, neutrality and opposition;
2. did not provide a response scale capable of capturing the full range and intensity of respondents' perceptions;
3. did not adequately accommodate organisational respondents;
4. required answers to certain mandatory questions that were not applicable to organisations; and
5. did not provide an obvious alternative mechanism within the online questionnaire for organisational respondents who could not meaningfully answer those questions.

Recognised questionnaire-design guidance and research provide relevant context for these concerns, particularly regarding the range of response options and the applicability of questions to respondents.

These sources do not, of themselves, establish that the WECA consultation was invalid or that its results are unreliable. Rather, they provide recognised questionnaire-design principles against which SPC considers it reasonable to ask WECA to explain the design choices made.

Taken together, the issues identified above raise questions regarding whether WECA's consultation process was sufficiently designed to capture the full range of stakeholder views and whether the resulting consultation findings adequately reflect the full range of views of those stakeholders who wished to participate.

In particular, SPC considers that a consultation on a strategic transport corridor should provide a clear means of identifying both support and opposition to proposals, whilst also enabling meaningful participation by all relevant stakeholders, including parish councils and other representative organisations.

SPC is not asserting that the questionnaire design necessarily invalidates the consultation or that WECA intended to influence the outcome. Rather, the Council may wish to ask WECA to explain the rationale for the questionnaire design and how it has accounted for the limitations identified above when analysing and reporting the consultation results.

Resolution at Saltford PC's October 2026 meeting

Saltford Parish Council resolved to submit a formal complaint to the West of England Mayoral Combined Authority regarding the design and conduct of the A4 Bath to Bristol Strategic Corridor – Keynsham Section consultation and also resolved to seek clarification on the matters identified in this report.

The Parish Council requests that WECA:

- explains the rationale for the questionnaire's response structure;
- explains how the questionnaire was designed to accommodate organisational respondents;
- confirms how responses submitted separately by SPC and other organisations will be incorporated into the consultation analysis; and
- explains how the limitations identified above will be taken into account when the consultation findings are analysed and reported.

References

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