

This document has been prepared using information available from the New Forest National Park Authority website, downloaded during the consultation period. For further information on currently available data please see our complaint (L1).

(A) Preparation of the Consultation Process

Authority Meeting 15 December 2005, paper NFNPA 48/05

There is the opportunity for direct involvement of all interested organisations, communities and individuals in developing the plan to produce a strong sense of ownership and support for the final document. In particular, this should include:

- Those organisations and groups which are 'hard to reach' or have been less well represented in previous consultation work (such as the business interests, young people, surrounding communities, coastal groups, visitors, national interests); and
- A high level of public awareness of the Plan and its purpose through publicity and opportunities to comment on the draft document.

Our complaint (A1):

The Authority has relied heavily on the New Forest Consultative Panel to provide the views of many organisations, but it has failed to adopt a mechanism to involve those hard to reach or less well represented groups as well as the general public. There is no evidence in the public domain to show any meaningful attempt to embrace these people/groups into the consultation process. The business community, and young people in particular, have been underrepresented and therefore denied the opportunity for direct involvement (except for a Drama by Forest Forge theatre company which culminated in a performance at the final consultation event in March). It is difficult to understand how the Authority could identify 'all interested organisations, communities and individuals' without a concerted effort to make them aware of the process; and of which there is little supporting evidence. This has left the general public with a feeling of exclusion and, far from producing 'a strong sense of ownership and support', has resulted in alienation of the public from the Authority's purposes.

There is little evidence in the public domain to show that the Authority used a robust publicity and 'marketing' plan to gain public awareness of the proposals. In the later stages of the process, the Authority denied the general public any opportunities of direct discussions by way of public consultation meetings (see Annex 1 & 7). Because of the complexities of both consultation documents, together with no platform to voice their concerns or ask questions; the general public were left unable to provide an informed response. (See complaint (B1)).

(B) The Design Process

Authority Meeting 20 July 2006, paper NFNPA 116/06

The Design Group suggested that the final plan should: -

- Be a relatively short, strategic document, clearly integrating related topic areas;
- Have a strong “New Forest” feel and identity
- Be evidence based; and
- Inspire change through ambitious policies for the National Park

Authority Meeting 15 December 2005, paper NFNPA 48/05

The published Management Plan must be a practical document, easily used by the National Park Authority and the range of statutory bodies, key partners, stakeholders and local communities.

The final document should: -

- Contain policies which are clear, based on the latest evidence, and will deliver the Vision and objectives
- Be concise, well written and designed, avoid jargon and acronyms and be structured in a straightforward and accessible way
- Reflect the underlying themes of working together, sustainable development and social inclusion.

Our complaint (B1):

At this stage in the process, the concept of a Recreation Management Strategy had not emerged, but the public were led to believe that **both** consultation documents were drawn up simultaneously. This has led to a perceived mistrust of the Authority’s ability to engage with the public. As there was no RMS document at the time of the December 2005 Authority Meeting we cannot comment here on the format of the document. However, the Management Plan, when finally in the public domain proved to be the total opposite to the recommendations in paper NFNPA 48/05. In fact, the document was cumbersome and inefficient to use, did not ‘flow’ and required the reader to move between sections particularly when attempting to use the equally inefficient Response Form. The quality of Maps and illustrative material was extremely poor.

There was a lack of clarity in many of the policies, which were left open-ended. There was a lack of straightforwardness and the ‘latest evidence’ was far from robust and has still to be proved. Any theme of ‘working together’ and ‘social inclusion’ appeared to have been mislaid along the way. Although, to be fair, the Management Plan more than adequately delivered the Vision and Objectives, which were clear, concise and well written.

Authority Meeting 20 July 2006, paper NFNPA 116/06

[The Design Process continued:]

In terms of partner and stakeholder engagement, the group noted the need to involve a wide range of interests. These included: local stakeholders, specific 'hard-to-reach' groups, communities (including those outside the Park), and visitors. It was felt that the process should make full use of existing consultative forums, such as the Consultative Panel.

Our complaint (B2):

- See complaint (A1) above
- There were no other similar bodies to the Consultative Panel in the stakeholder participation but the use of a plural in paper NFNPA 116/06 suggests that more than one was invited.

Authority Meeting 20 July 2006

It was resolved that the views of the Design Group relating to the overall 'look' of the final Management Plan and the range of stakeholder interests to be involved in the process be endorsed.

Authority Meeting 26 June 2008, paper NFNPA 261/08

The draft National Park Plan combines the National Park Management Plan and the Local Development Framework Core Strategy into a single integrated plan. This is the first time a national park authority has brought these two policy documents together. It has been prepared as a public consultation document to gain the formal views of a wide range of organisations and individuals both within the National Park and regionally and nationally. The Public Consultation will also include consideration of possible alternative policies.

Design Considerations:

- Following approval of the Park Plan **text**, design work will be required to produce an accessible and attractive consultation document including relevant maps and illustrative material.
- The main purpose of the design will be to make the document easy to follow and to gain a high level of response from consultees. It is suggested that an 'over-finished' consultation document would be counter-productive and that the design should clearly signal that this is an interim stage in the production of the final plan.

Authority Meeting 26 June 2008

Resolved: That:

- The draft of the National Park Plan be **approved** for publication as a consultation document; and
- The proposed scope of the consultation and consultation questions be approved

Voting: Unanimous

Our complaint (B3):

The unwavering ambition of the Authority to become the first NPA in the country to combine the Management Plan with the LDFCS into a single integrated plan is commendable. However, to maintain credibility in this regard, the Authority should not have resolved to approve the draft National Park Plan for publication before sight of the further design work, which included key data such as maps and illustrative materials.

It was clear in the paper NFNPA 261/08 that the members were asked to only approve the **text** of the Park Plan. The resulting paste-up should have gone back to the Authority Members for final approval before printing. We therefore believe that the Authority acted without due care and diligence.

“The main purpose of the design was to gain a high level of responses from consultees”. We presume ‘consultee’ (although not in the Oxford dictionary) is reference to those whom the Authority invited to consultation meetings. If this is the case, we fail to understand the emphasis on ‘consultees’ at this stage, as they had already been involved in the stakeholder process and by definition helped to shape the draft document. If this process were open and transparent then the Authority would have no need to focus on consultee responses. We believe that the Authority’s priority audience at this juncture should have been the general public, and that the Authority has acted unfairly.

The design did not clearly signal nor emphasise that this was an interim stage in the production of the final plan, nor did it make clear that there would be other opportunities for inclusion of the general public’s views on the final plan before releasing it for ratification. (See Annex 8).

(C) Research***Authority Meeting 15 December 2005, paper NFNPA 48/05***

It is considered essential that the final document should: -

Contain policies which are clear, based on the latest evidence, and will deliver the Vision and objectives

Authority Meeting 26 June 2008, Paper: Lane Use Consultants Draft

We believe, however, that there are some important initiatives that can and should start now, while we gather evidence to inform others in the future, so this Strategy is presented at two levels. On the one hand, it is strategic and long term, setting out our clear ambition and direction of travel for the next 20 years. At the second level, we have set ourselves a shorter five-year timescale to monitor the impact of the Strategy’s policies and to complete a programme of research to gather missing evidence. A thorough review in five years will enable us to confirm or develop the interim policies in this Strategy.

Big issues that were a constant theme in the consultations were:

- Respecting the fragility of the National Park environment: the environmental quality of the National Park is not only subject to strong legal protection but forms the basis of what visitors come to enjoy. There is a widely held perception, backed up by clear localised evidence in some places, that the environment is being damaged through recreation pressure. The policies in the Strategy must recognise the legislative drivers for protection. Where possible they should also be based on clear, well researched evidence. Where this is not available, the approach will normally be based on the precautionary principle.
- Managing uncertainty: both in the extent and quality of data currently available and in understanding future trends in recreation. There are significant gaps in data, for example in the comprehensiveness of information on visitor numbers to the National Park and of evidence-based research on the impact of recreation activities on wildlife and so on. These gaps will be addressed through a programme of research, data gathering and monitoring (see Chapter 7) and will inform the five-year review of the Strategy. Similarly keeping abreast of trend and futures analysis will be essential as the Strategy is implemented.
- After five years this Strategy will be reviewed on the basis of evidence collected in the intervening period. At this point it will draw on a more comprehensive information base.
- Research and monitoring is therefore essential to develop the information base over the coming five years to:
 - Understand trends in recreation use and future predictions;
 - Verify current levels of recreation provision
 - Understand better the impacts of recreation on the special qualities of the New Forest

Our Complaint (C1):

The consultation draft documents were not clear and the ‘latest’ evidence used was produced in the early 1990’s. Responses already received from other organisations will no doubt confirm this.

It is clear from the LUC paper that further evidence and research is needed, as does the “Footprint Ecology Report”. It appears that the next five years (if the draft policies are ratified) will be a period of trial and error whilst the Authority commissions further research.

At this juncture that there were significant gaps in available data and therefore it was an unstable starting point for such an ambitious undertaking. We believe the Authority was reckless to allow the process to continue from this point.

(D) New Forest Consultative Panel

NFNPA Website

Over the 30 years since the Panel was established it has raised awareness and influenced decisions on many key issues and threats. It is considered as the main overall consultative body for the National Park area.

Authority Meeting 15 December 2005, and paper NFNPA 52/05

In the Authority Meeting of 15 December 2005 it was resolved: -

- Members endorse the principle that the Panel's purpose should more closely reflect National Park purposes and
- That members agree continued support for the operation of the Consultative Panel, with costs reviewed as required as part of the Authority's Budget setting process and
- That the Authority seeks further advice on the question of whether Authority members should continue to represent other organisations on the Panel and

That members agree to the updating of the Panel Leaflet and headed notepaper, with costs found from within the overall budget for Panel administration

Extracts from the New Forest Consultative Panel Handbook

The Constitution and Working Procedures of the New Forest Consultative Panel comprises 70+ organisations with an interest in the protection and conservation of the New Forest.

Its overall purpose is to ensure the conservation of the special qualities of the New Forest National Park and its environs

Its Terms of Reference include:-

- To act as a sounding board and key consultative body for the National Park Authority and the statutory bodies with responsibilities covering the National Park and surrounding areas.
- To meet regularly to debate, in public, matters which concern the conservation, understanding and enjoyment of the New Forest National Park

Membership criteria include: -

- An organisation with interests which cannot adequately be represented by an existing Panel member organisation
- New Applications: The National Park Authority will be advised of and asked to endorse the Panel's views on applications for membership

Our Complaint (D1):

As mentioned in complaint (A1) above, the New Forest Consultative Panel was the organisation of choice by the Authority to consult before, during and after the entire process. However, we feel that in the light of the above transcripts there are issues on the autonomy of the organisation that we fail to understand. For example, an independent body would generate their own funding, would not allow conflicts of interest to occur, and would surely not feel the need to have new membership applications 'vetted' by a government authority. An independent organisation, if well established, should have already consulted with its members before a stakeholder process was convened. It then would have only the need for 2-3 committee members to attend. Instead, the NFCP was oversubscribed at the stakeholder workshops (42 members plus the Chairman), thus taking up seats, which could have been given over to the hard to reach groups, business community etc., which have been mentioned earlier.

It must be noted that many of the NFCP members have responded negatively to the consultation.

(E) Stakeholder Workshops

Authority Meeting 20 July 2006 paper NFNPA 116/06

There is likely to be a high level of interest in this first statutory National Park Management Plan from a range of stakeholder and partner organisations, and it is essential that they are fully involved in the process. In addition every effort should be made to include interests, which traditionally have been less involved in the decision-making process.

It is suggested that the stakeholder participation work should include:

- Targeted events aimed at 'hard-t-reach' groups

To get the most out of these events it is important that they are carefully designed... it is suggested that specialist consultancy advice should be sought regarding the design of the process overall.

Authority Meeting 20 July 2006

Resolved: that an inclusive approach to stakeholder involvement be approved and specialist consultants be commissioned to design the process in more detail.

Authority Meeting 20 July 2006 paper NFNPA 116/06

The consultation draft of the Management Plan will bring together the work with members, partners and stakeholders. It will require further input from Authority members prior to publication and comprehensive publicity to raise awareness and encourage comments from all those who may be interested.

Recommendation: That the Authority **notes** the broad outline of the public consultation and final approval stages of the Management Plan, to be worked up in more detail for future agreement.

Authority Meeting 20 July 2006

Resolved: that the broad outline of the public consultation and final approval stages of the Management Plan, to be worked up in more detail for future agreement, be **approved**.

Authority Meeting 26 June 2008, paper NFNPA 261/08

An exhaustive series of workshops and meetings have enabled interested organisations to contribute directly to the content of the Plan.

Our Complaint (E2):

From the data available on the NFNPA website during the consultation period we are able to demonstrate that the 6 main workshops had an average attendance rate of 33% (see Annex 2). We are also able to demonstrate multiple delegates from agencies that are already partner organisations with the Authority (see Annex 3). A number of stakeholders could not be considered local, i.e. DEFRA, RSPB. Forest Holidays sent different delegates, both not from the area. We believe this data would not stand up to external scrutiny.

We believe each group was pre-selected, not random, and the person entering comments on the whiteboards were also pre-selected (NFNPA or FC official) who had considerable control over the input. This is not conducive to meaningful consultation.

We feel that the structure of these workshops was unfair and it should be noted here that the Authority has misled the reader by terming these lists as 'Public Participation in the Preparation of the Plan'. There is no evidence available to show how the Authority targeted events intended to reach and embrace those hard-to-reach groups, and we have no confidence that this was a priority for the NFNPA.

Although the Authority resolved to commission specialist consultants to design the process (presumably LUC), this does not absolve it of all responsibility in the shortcomings of the design. We are of the opinion that the Authority failed to oversee this process diligently and were therefore negligent in their responsibilities to ensure openness and transparency. The cost of this commission was an added burden on the taxpayer. There is no evidence of a comprehensive publicity awareness exercise to encourage comments from interested parties. The general public were not fully aware of the consultation documents until mid September 2008. Again, the Authority has failed in their accountability to the public.

There is evidence now to show that the draft plans delivered into the public domain have not replicated the conclusions reached at the stakeholder workshops. We can only assume that the content of the documents were changed after the workshops and before final publication.

(F) Consultation Arrangements

National Park Plan

Authority Meeting 24 April 2007, paper NFNPA 182/07 – Biodiversity Action Plan

6.1 Timetable: Stakeholder consultation and consensus on issues and options for action (where possible, this will utilise the Management Plan consultation workshops).

7.2 The Draft Plan will be the subject of a final consultation period. Key stakeholders, wider partners and the public will be targeted for their views. Consultation surgeries will be held to enable discussion of views directly with officers.

Authority Meeting 24 April 2007

Resolved: That the proposed timetable, preparation process, partnerships and vision for the Plan be **noted and approved**.

Authority Meeting 26 June 2008, paper NFNPA 261/08

Consultation will be for a period of 10 weeks to allow sufficient time for responses from all organisations, including the community sector, during the summer holiday period.

The document will be promoted widely to the general public, including formal notices. Copies will also be sent directly to a wide range of statutory consultees, organisations that are involved in work relevant to the document, those that have participated in the consultation to date and all who have expressed an interest in viewing the Draft Plan.

Authority Meeting 26 June 2008

John Ward has been impressed with the high level of engagement between the Authority's officers and the public; members had also been extensively involved in the drafting process from the beginning.

Authority Meeting 26 June 2008, paper NFNPA 261/08

Recommendations to:

- Subject to any comments, approve the draft of the National Park Plan for publication as a consultation document.
- Approve the proposed scope of the consultation and consultation questions

Authority Meeting 26 June 2008

Resolved: That:

- The draft of the National Park Plan be approved for publication as a consultation document; and
- The proposed scope of the consultation and consultation questions be approved

Voting: Unanimous

Our complaint (F1):

Although the Authority resolved to approve the timetable, preparation process, partnerships and vision for the Biodiversity Action Plan we believe this never reached discussions at the stakeholder workshops.

Furthermore, the **approved** consultation surgeries never took place.

The document(s) publication was not widely promoted to the general public. Formal notices were not prominent and were only in 3 local newspapers. Posters were not widely distributed as few of the public had seen them. Again, the Authority's target audience was not the general public – it was the stakeholders and consultees (who were already aware of the imminent publications) who were given priority.

We are totally puzzled by the comment from Mr Ward that there was a high level of engagement between the Authority's officers and the public. The public in general were not aware of the consultation process directly **after the launch** so how could the public have been aware of the consultation process **before the launch**? The Authority should investigate the possibility that Mr Ward had mistaken 'stakeholders' for 'public'. If this is the case, then his comments in the minutes should be corrected.

In our opinion, the consultation period of 10 weeks was not long enough to take account of the summer holidays and it was a bad decision to launch the consultation at the height of the season.

There were considerable delays in obtaining copies of the documents because the Authority failed to order appropriate quantities. There were further delays in the availability of the documents whilst another print run was arranged.

We asked for 50 sets in late September for a public meeting of over 100 people, but the Authority limited us to only five. (See our complaint H1).

Recreation Management Strategy Draft***Authority Meeting 26 June 2008, paper NFNPA 262/08***

It is important that the Strategy is clearly seen to be shaped and influenced by the public consultation.

Authority Meeting 26 June 2008, paper NFNPA 262/08

The Recreation Management Strategy is intended to serve as a subsidiary document to the National Park Plan. It is deliberately short and strategic in its approach. The translation of policies into practical activity will be outlined in an action plan, which we intend to develop with key partners later in 2008 and during 2009.

Authority Meeting 26 June 2008, paper NFNPA 262/08

The consultation process and preparation of the draft Recreation Management Strategy has been largely undertaken by Land Use Consultants on behalf of the Authority.

Authority Meeting 26 June 2008, paper NFNPA 262/08

The process has been overseen by a small Steering Board of National Park staff. A Members' Advisory Group and a Stakeholder Advisory Group have also helped to steer and influence the process.

Authority Meeting 26 June 2008, paper NFNPA 262/08

The draft has been informed by extensive consultation with individuals and organisations between October 2007 and May 2008.

Authority Meeting 26 June 2008, paper NFNPA 262/08

The document will be promoted widely to the general public. Copies will be sent directly to a wide range of organisations that are involved in work relevant to the document or that have already expressed an interest in the plan.

Authority Meeting 26 June 2008, paper NFNPA 262/08

Results of the consultation will be reported to members in due course and a revised Recreation Management Strategy will be produced for final Authority approval later this year/early in 2009.

Authority Meeting 26 June 2008, paper NFNPA 262/08

Recommendations to:

- Subject to any comments, approve the draft of the National Park Plan for publication as a consultation document.
- Approve the proposed scope of the consultation and consultation questions

Authority Meeting 26 June 2008

Resolved: That:

- The draft Recreation Management Strategy be approved for publication as a consultation document; and
- The proposed scope of the consultation and consultation questions be approved

Our complaint (F2):

There was little opportunity for the public to help shape or influence the Strategy because the Authority denied calls for full public consultation meetings (see Annex 1). If these meetings were facilitated then perhaps the public would have felt less alienated and more receptive to the Authority's purposes. Sadly, another opportunity for the NPA to demonstrate a willingness to engage with the public was lost.

It was not made clear to the public that the RMS was a subsidiary document. The policies therein were poorly written and left open-ended. The omission of policy translation into practical activity played a big part in alienating the public from the document and the Authority was wrong to have expected the public to allow these important policies to be worked up in an action plan **after** the consultation ended.

Our complaint (F2) continued...

Although the Authority resolved to commission Land Use Consultants, this does not absolve it of all responsibility in the shortcomings of the content. We are of the opinion that the Authority failed to oversee this process diligently and were therefore negligent in their responsibilities to the public.

The reference in the paper NFNPA 262/08 to extensive consultation with individuals and organisations between October 2007 and May 2008 is misleading. The term 'individuals' suggests members of the public – which was not the case and the record should be amended to reflect this.

The document(s) publication was not widely promoted to the general public. Formal notices were not prominent and were only in 3 local newspapers. Posters were not widely distributed as few of the public had seen them. Again, the Authority's target audience was not the general public – it was the stakeholders and consultees (who were already aware of the imminent publications) who were given priority.

At this juncture, the intention of the Authority was to revise the RMS document after the consultation process and approve the final document at a later date. (See Annex 8). In the light of serious public outrage the Authority has now stated that there will be further consultation. We believe the Authority' has failed in their duty and responsibility to the public.

(G) NFNPA Website Q&A Pages***Our complaint (G1)***

In the unexpected chorus of disapproval from the public, we believe the Authority attempted a damage limitation exercise by publishing an 8-page list of Q&A's on the NFNPA website on 26 September 2008, over one month into the consultation period. This was a helpful tool for those people who had access to a computer and broadband, but there was no visible attempt to promote this document by other available means.

On 15 October (just over 2 weeks before the original closing date), the Q&A website document was replaced with another document, totalling 11 pages. The Authority failed to highlight that this was now a **revised** document, which would have alerted the public to **four additional questions and considerable editing of the original document**.

This second document is an obvious response to the growing negative media coverage that was generated, not by the NFNPA, but by members of the public and in particular the Forest Uprising Group and NFDOG.

Our complaint (G1) continued...

We believe that this revised document does not tell the truth and that it formed part of a 'paper-trail' in an attempt to close the net and placate the widespread public unrest.

We are also of the opinion that the 2-week extension to the consultation period was granted as it was becoming apparent that responses to the draft documents were low in numbers which in turn gave the Authority 'breathing space' in the hope of reaching credible numbers. There were also calls from Parish Councils to extend until 31 December 2008.

A disturbing comment in this revised document is "The Authority does not believe that a public meeting is the best method for encouraging considered responses during the consultation period". (See Q5).

This cavalier attitude is what the general public have come to expect from the Authority – but they do not deserve to be treated in such an off-hand manner. Their points of view are valuable to the process and should be respected.

Q5

"It is also important to note that the draft plans were produced only after an extensive series of public meetings...."

This statement is grossly misleading – the Authority has confused itself between public meetings and stakeholder meetings, the latter of which the public were not in attendance.

Q21

The Authority does not make it clear that making final decisions on the National Park Plan and the Recreation Management Strategy will take place at an Authority Meeting *held in public* and not 'at public meetings of the Authority' (see Annex 1). Furthermore, it has not made clear exactly what will be the make-up of the Local Development Framework Core Strategy nor whether the public will have sight of this before going to formal public hearings. The Authority has not given the public all the information in this respect but we have been advised by DEFRA that:

"The Local Development Framework documents are scheduled to be subject to formal public hearings before independent planning inspectors from 2009 to 2010 to allow any objections and representations to be heard. Notice of those hearings and details on how to lodge objections and representations should in due course be advertised in the local press".

Q22 Advertising

This is an outrageous claim by the NPA. Other than its statutory requirements to advertise the launch of the consultation exercise, it was others **and not the NPA** who generated the great majority of media articles.

Our complaint (G1) continued...

Members of the Authority took part in press, TV and Radio interviews at the request of the media but 95% of the coverage was negative to the NPA.

The Authority has stated that posters etc., were sent to Parish Councils but this was not the right platform to reach the public (see Annex 4). We would expect the Authority to have researched their target market more thoroughly. Park Life Newsletter is covered in Complaint (I1).

We refer to the below extract of the Authority Meeting on 26 June 2008 and Q21: Next Steps in the Q&A document (first line), which are clearly contradictory. (See Annex 8).

***Authority Meeting 26 June 2008, paper NFNPA 262/08
Results of the consultation will be reported to members in due course and a revised Recreation Management Strategy will be produced for final Authority approval later this year/early in 2009.***

It has taken over 4 months to provide this information to the public (see complaint (F2) last paragraph), but on the other hand Annex 8 demonstrates no intention to consult further.

(H) Meetings Arranged by Individuals and Groups

Our complaint (H1):

The general public has been frustrated at the lack of engagement from the NPA during the consultation period. Having only the 2 (confusing and badly written) consultation documents for reference it is no wonder that they had grave concerns and issues, which needed direct answers in order to give an informed response.

This has been reflected by the public organising their own meetings to discuss both plans in more detail and to share concerns and information. This resulted in some meetings being fortunate enough to have one or two NPA representatives present and other meetings having no Authority representation.

The meetings were arranged at considerable costs to those concerned, but they felt so strongly that people had not been heard, they were prepared to foot the bill. In particular, NFD OG had considerable expense informing its members by a special newsletter and maintaining website pages to inform the public. Individuals financed our own meeting in Tiptoe, and the Authority only allowed us five sets of the draft documents to distribute to over 100 attendees.

The Authority was seen to send representatives to the meetings of groups or individuals who were prominently in the media, but this ad hoc approach should not be construed as the Authority attending public meetings.

Our complaint (H1) continued...

We attended a meeting arranged by a member of the public where speakers were from the equine and dog groups plus a representative from the NFNPA. The expectation from the audience was that all aspects of the draft plans would be discussed, but the meeting did not broaden out to other matters and after an hour, people began to trickle out of the meeting.

In our opinion it was the Authority's responsibility to inform the general public at the expense of the Authority. Individuals should not have been forced to arrange their own meetings to discuss the draft documents, and they should certainly not have had to put their hands in their own pockets to fund them.

The Authority has said they would have meetings with Parish Councils instead of the public meetings called for by ONE VOICE on 16 October. This has resulted in members of the public seeking out **any** Parish Council meeting where an NPA representative will be attending in order to go along and ask questions. These meetings had a higher than average number of members of the public attending. Annex 4 demonstrates the true numbers of public attending Parish Meetings. It is our opinion that the Authority chose Parish Council meetings for exactly that reason – low public attendance.

(I) Park Life Newsletter Distribution

Our complaint (I1)

Bringing forward publication of the Autumn/Winter 2008 Park Life Newsletter, we believe, was another damage limitation exercise by the NFNPA and should not have been linked to their so-called media coverage. (See complaint G1).

Contrary to the NPA's claims in the revised online Q&A's, this publication has not reached many letterboxes in the postcodes mentioned. (See Annex 5).

Spring/Summer 2008 Newsletter

The Authority did not take the opportunity to highlight the upcoming public consultation exercise in detail. This would have at least prepared the public to await the launch. However, this may also have had distribution difficulties as mentioned in Annex 5.

Although the Authority commissioned a distributing company, this does not absolve it of any responsibility to ensure the company carried out their duty. We are of the opinion that the Authority failed to oversee this process diligently.

Online Edition of "The Update" – issue 38/July 08

The Authority missed another opportunity to inform the public of the consultation exercise particularly as the draft documents had already been approved at that time.

(J) Response Forms

Authority Meeting 26 June 2008, paper NFNPA 261/08

A user-friendly means of responding to the document will be carefully designed as part of the draft plan (both as paper and on-line versions). Consultation questions will enable an assessment of public comments

Our complaint (J1):

The concept of user-friendly response forms would have been extremely useful for everybody. Unfortunately, what was decided at the Authority Meeting of 26 June 08 did not reflect this concept. Both paper response forms were restrictive in their design; without a tick box for 'don't know' the reader was forced to use another answer. Many people thought that these were designed for a particular outcome and a considerable number of people feel that perhaps the 'freeform' comment boxes would not be reflected in the final appraisal.

The online response forms were unstable with no clear method of saving the data; one had to assume an 'automatic save facility' was built in - consequently there is a risk of some data not being registered.

(K) Final Consultation Response Figures

Our complaint (K1)

Although we still await final response figures from the Authority, we feel very strongly that any petition(s) signatures received which only object to 3-4 policies from one document would give an exaggerated total if included in the overall 'count'. However, they do represent a substantial number of people with specific concerns and these numbers should be weighted separately and appropriately within the collating process and further deliberations.

It appears from initial figures that there has been a low uptake considering there are over 34,000 residents within the National Park. We believe this to be a dangerously low level of responses and in the light of public outcry; the Authority should think very carefully about whether it continues to take this project forward to conclusion under its present format.

(L) **Additional Information Uploaded to NFNPA Website**

Our complaint (L1):

There has been a great deal of additional information uploaded onto the NFNPA Website since the close of consultation, and it seems uploads appear as and when the Authority receives complaints or requests for additional information under the Freedom of Information Act. All of this data should have been in the public domain at the time of the consultation period to enable informed responses.

There are particular concerns which have been highlighted in Annex 6 and should be noted by the Authority.

For example: interactive maps are now available on the website but the Authority failed to produce clear maps in the design of the draft documents for the consultation period.

We believe this is sharp practice by the Authority and the general public has been denied sight of this information during the critical phase of consultation.

We therefore consider that the Authority has acted unfairly.

New Forest National Park Authority Corporate Plan 2008-2009

Integrity: “We will be honest, objective, fair and diligent in our work; make decisions based on the best available evidence; and be personally accountable for what we do and collectively responsible as an organisation for our decisions and actions”.

Openness: “We will encourage, listen to and respect each other’s and other people’s views and contributions, freely share our knowledge and information, be clear in what we say and be open to fresh ideas and adaptable”.

SUMMARY

There is probably no need to give a summing up to this comprehensive document other than to draw your attention to the above promises within the Authority’s Corporate Plan.

We acknowledge that this process was a huge undertaking for the Authority, particularly as it has been driven by the inclusion of the Local Development Framework Strategy; something never before attempted by a National Park Authority. Regrettably, this has had a confusing effect on the entire process and has sadly left the general public having no confidence in the management of the Authority.

Continued...

SUMMARY continued...

Under normal circumstances, where an elected organisation is held accountable to those who elect them, a vote of no confidence can be instigated if other members felt the organisation had not conducted their business in an open and transparent fashion, or disregarded the importance of a fair consultation process, or chooses to change the goal posts in defence of increasing objections.

Sadly the residents, local businesses, and visitors of the New Forest have had a quango imposed upon them with no means of redress, even though DEFRA have said the decision-makers take their own decisions and account for them directly to the public.

The NFNPA have acted with tunnel vision to achieve their ultimate goals and have paid little regard or respect for the people who should have been included from the very beginning – the general public.

In conclusion, this document has demonstrated that to continue with such a flawed course of action would be detrimental to the New Forest and a reckless act by the NFNPA.

The Authority should publicly acknowledge it has made fundamental errors in the process that led to the production of both draft plans. It should accept that they have got it wrong and must now demonstrate how they intend to put it right.

We therefore reiterate to the Authority the necessity for open and transparent public consultation meetings during this next phase (as called for in Annex 1) and that the NFNPA now, more than ever, should demonstrate courage and commitment to the people of the Forest.

We sincerely hope that the New Forest National Park Authority will recognise their shortcomings; take heed of their responsibilities; deliver their Corporate promises; and understand that we are **all caretakers** of our irreplaceable New Forest.