

BY EMAIL

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06 April 2010

New Forest National Park Authority
Policy & Plans Team
South Efford House
Milford Road
Lymington
Hants SO41 0JD

Dear Sirs,

Representation on the Core Strategy Submission Documents

Please find enclosed representation from the ONE VOICE group, which covers only the Consultation Statement (Regulation 30(1)(d) Statement) February 2010.

You may wish to note that our (several hundred) members have been advised to submit their own representations on any issues they may have regarding the full suite of documentation if those issues lay outside of the ONE VOICE Mission Statement.

ONE VOICE would like to be notified of the following: -

- That the Core Strategy and Development Management Policies DPD has been submitted for independent examination
- The publication of the recommendations of the Inspector appointed to carry out the independent examination of the DPD
- The adoption of the DPD

Yours sincerely,



Mrs Sue Baillie
For and on behalf of ONE VOICE

Representation from ONE VOICE on the New Forest National Park Authority's Consultation Statement (Regulation 30(1)(d) Statement) February 2010

This document also has regard to the *Statement of Community Involvement* (March 2007)

PART I

Background and Mission Statement of the ONE VOICE Group

The ONE VOICE Group was established after a general public meeting held on 29 September 2008, which was attended by over 120 New Forest residents concerned by the proposed policies contained in the New Forest National Park Authority's Draft Consultation Documents, namely the Park Plan Consultation Draft and the Draft Recreation Management Strategy (RMS). The points raised at the meeting were many and varied but one major concern was that the NPA had to date shown a perceived unwillingness to engage with the public on such a major plan. Thereafter, the group resolved to empower the general public (by providing relevant and factual information) to lobby the NPA and other relevant bodies for: -

- An extension to the cut-off date of 31 October 2008 to allow due process of responses.
- To accommodate a series of open and transparent public meetings at accessible venues, outside of working hours; facilitated by NPA members who are conversant with the consultation draft and the consultation process. These meetings should also be appropriately publicised in local newspapers by the NPA.

By 11 October 2008 (less than 2 weeks after its formation), ONE VOICE received the support of local & District Councillors; Members of Parliament; The Leader of Hampshire County Council; business owners; and others. (See *Annex A*)

On 16 October 2008 ONE VOICE made a statement to the New Forest National Park Authority Meeting criticising the consultation process to date and asking for a series of public consultation meetings. The response received from the NPA was negative. (See *Annex B*)

On 10 December 2008 ONE VOICE submitted a Formal Complaint to the New Forest National Park Authority regarding the consultation process. This document sits within the Authority's offices at South Efford House, and in our opinion remains an active document, which should be surrendered to the Inspectorate as part of the initial consultation response documentation. The NPA's response letter signed by Richard Lemon should also accompany it.

Our Formal Complaint was uploaded to our website (www.onevoice.officeoverload.com) and a mechanism was put in place for individuals to confirm their support of the document and also offer their own comments if required. (See *Annex C*)

ONE VOICE has advised its several hundred members to submit their own representations to the NPA on any issues they may have which are outside of our Mission Statement.

Please find our comments to each section of the Consultation Statement as follows: -

Introduction: 1.6

Whilst we agree the Authority exceeded its statutory requirement on consultation it should be noted that this came about because of public pressure to do so coupled with other in-house difficulties (see Part II of this representation). The word 'significant' implies the Authority voluntarily adopted an 'above and beyond' approach to the consultation process, which is not the case.

2. Core Strategy Regulation 25 Consultation 'Issues and Options' 'Future Matters' Consultation Summary

The Citizens' Panel and the Young Peoples' Panel are initiatives of the New Forest District Council. The members are only required to complete seven questionnaires per annum and, to our knowledge, the survey data has not appeared in any of the NPA's consultation response documentation. The surveys referred to in the Consultation Statement are non-specific and therefore the questionnaires may only have been pertinent to the NFDC planning policies of the time. We have been assured by the NPA that NFDC policies are only being used as an interim working platform until the Core Strategy is ratified. We therefore feel that reference to these surveys may be misleading. We would question the NPA's motive in highlighting these 2 groups in their submission documents when it is clear that these groups were not included in any of the workshops or other consultation exercises.

2.2 and 2.8

The list of those invited to comment is very impressive (NPA Annex A) – a total of 395 organisations and over 80 Individuals. However, this does not correlate with the table of "How Many Commented?" A more honest and transparent answer to this question would be that 37% of organisations commented. NPA Annex A states that over 80 individuals were invited to comment, but the figure in the table is 429. This needs to be clarified.

2.3

The Young Peoples' Panel Survey findings do not appear in other consultation response documentation. ONE VOICE has been critical of the NPA for not going the extra mile to include those hard to reach groups (see our Formal Complaint) and it appears that this group is now being highlighted as a main source of comment/consultation for the first time by the NPA.

2.4

Parish Councils may be a statutory body to consult with on the assumption that they are best placed to know what their Parishioners feel about changes to their way of life. Unfortunately, in real terms, this may not always be the case (See Annex D) which, although not fully up to date and not inclusive of all the 37 Parish Councils, is indicative of the very poor turnout of members of the public at Parish Council meetings. People invariably go to these meetings to support or object to a neighbour's planning application, or if they have been made aware by reasonable notification of any NPA speakers. We

know of only one Parish Council that made the effort to ensure all Parishioners were aware of such a meeting.

2.5

Copies of the "Future Matters" consultation document were placed in selected libraries, some of which are outside the boundary of the National Park. Why was a decision made not to have the document placed in all libraries within the boundary? If this were done, a wider audience would have been captured and many members of the public would have been aware that the consultation process was imminent.

2.8

See 2.2 above. We are concerned that not all respondents answered all sections or all questions within each section and this could have produced an unstable or distorted outcome.

3. Additional Stakeholder Involvement "New Forest, New Chapter" Events – Consultation Summary

3.1

According to the Authority Meeting of 26 June 2008 (paper NFNPA 261/108) the Core Strategy and Management Plan were combined into a single integrated plan but the "Consultation Statement" suggests a decision was taken in mid-2007 to produce a separate Core Strategy. This needs to be clarified. (See our Formal Complaint, point E2).

3.2

Although 190 organisations were identified and invited to the 'workshops' of which 70 were involved in the discussions, we are concerned that, with the exception of the Inaugural Workshop in October 2007 and the Concluding Event in March 2008, the highest percentage of attendance in any given workshop was 35%. We are particularly concerned that attendance in October 2007 for the Forces for Change Workshop was only 14%. (See Annex 5).

Furthermore, there is the outstanding matter of a Freedom of Information investigation regarding the issue of dog-free car parks. In mid-March 2010, the case officer (James Merrifield, Case reference FER0239588) contacted the FOI correspondent to say the NPA had uncovered written material it had earlier denied existed, but was now claiming exemption from disclosing it. His next step would be to examine the soundness of this. This material related to discussion(s) as to the inclusion of dog free car parks in the RMS. He also stated that the person(s) responsible for including it in the RMS could not be identified from the documents, and only an approximated date could be given. (See our Formal Complaint, point E4 and PART II of this Representation).

Consultation with Hard to Reach Groups

3.3

What is meant by "A variety of other means...."? This needs to be more specific. There would be a real difference in opinion between Primary School children and Secondary School children and this is not clear. The images used in this section of the Consultation Statement look rather immature and suggest Primary School children drew them.

3.4

It is our view that Forest Forge was commissioned retrospectively by the National Park Authority to specifically increase the shortfall in its engagement with those 'hard to reach' individuals –presumably funded by taxpayers. It is not clear in the Consultation Statement whether this Drama was independently created, and there is no information about the event on Ringwood School's web site archives. It should also be noted that Ringwood School is barely within the boundary of the National Park. (See our Formal Complaint, point A1).

3.5

We refer to the Authority Meeting of 24 April 2007 (paper NFNPA 182/07) where it was approved that consultation surgeries will be held to enable discussion of views directly with officers. We cannot find any evidence that these surgeries ever took place. (See our Formal Complaint, point F1).

4. Regulation 26 Consultation – consultation draft National Park Plan Consultation Summary

Who was invited to comment?

Although NPA Annex C sets out the full list of organisations sent either a copy of the draft National Park Plan or a letter of notification, we would like to stress that many of these organisations were not local to the New Forest and therefore this list may give a distorted impression of how wide the consultation notices were circulated. (See our Formal Complaint, points A1 & F1).

How were they invited?

We feel that the Public Notice in 3 local newspapers could have been larger and more prominent. We question how wide an audience was captured by the Press Release. There is no mention of whether all local libraries were issued with a poster and no mention of where the remaining 47 posters were displayed.

The claim that the Authority's newsletter Park Life had been distributed to 90,000 homes is excessive (see Annex F and our Formal Complaint, point I1). We would like to point out that there is a strong probability that the estimated 25,000 'hits' on the Authority's website was a result of lack of information elsewhere in the public domain.

When?

We feel that the Authority should mention that it listened to calls from the general public to extend the consultation period, which was eventually extended by 2 weeks.

How many commented?

(See our Formal Complaint, points J1 & K1).

4.1

It is disheartening to see that the Authority still does not own up to its mistake in combining the Management Plan with the Core Strategy and would rather place the onus for this firmly onto the shoulders of the Inspectorate. (See our Formal Complaint, point B3).

4.6 (See our Formal Complaint, point G1).

5. Additional Stakeholder Involvement – 2009

Parish Council Meetings

5.5

It is our opinion that the Authority failed to ensure that Parishioners would be invited by Parish Councils to attend any meetings to discuss the development of the Management Plan and Core Strategy with NPA representatives. This resulted in many Parish Councils 'opting-out' of the opportunity for further dialogue. The lack of publicity by the NPA or Parish Councils for the meetings that did take place created an imbalance of opportunities for the public to attend. Because of this, ONE VOICE contacted all Parish Councils for information on whether these meetings would take place. The information was then placed on our website and updated accordingly. This was the only way the information was made available to the general public. (See Annex D and the ONE VOICE Website).

Public Meeting

5.9

The Authority should acknowledge that the public meeting on 2 September 2009 was partly in response to calls from the general public and not a stand-alone decision by its members and officers. This meeting was publicised as a platform to address the issues raised in the Management Plan and Core Strategy. It was not publicised to address issues raised in the RMS. ONE VOICE called for a second public meeting to address the RMS issues but this was not forthcoming. (See Annex G). We feel that the alternative chosen by the Authority (a drop-in session) was not adequate and the Authority should include this session and the attendance figures in their Consultation Statement.

6. Publication of the Submission Draft Core Strategy – February 2010

6.1

The Authority should be honest in respect of the time allocated between publication and the Authority Meeting on December 2009 and that once again, through public pressure and a petition launch, this was released earlier than the statutory requirement as set out in the Authority's standing orders.

NPA Annex B and Annex C

We note that the Citizens' Panel and the Young Peoples' Panel were not on the list of participants or consultees

PART II

Although our primary concern is with the Consultation Statement submission document, we cannot ignore the apprehension people have on the ability of the current senior management team to carry forward the Management Plan, Core Strategy and RMS without the retrospective knowledge of the problematic circumstances, which in turn led to a fundamental breakdown of trust between the Authority and the general public.

ONE VOICE has remained a neutral group consisting of several hundred members of the public who may or may not belong to other interest groups. We have always listened to the concerns of individuals who feel passionately about 'their' forest and a perceived threat to their way of life. This is as important to them today as it was when our group first formed. We continue to hear peoples' viewpoints either in general terms on the Authority's evolution or on specific issues within the development plans. What is apparent to us currently is that the trust between the Authority and the public remains a fragile strand, which requires strengthening over time and continued vigilance by the Authority in the future.

In order for this trust to flourish the Authority must understand the current concerns of the general public and do what it can to assure people that the past problems have been recognised and remedied. There are several historical factors that have eroded public confidence in the capabilities of the Authority which, in isolation, may not have a great impact – but combined gives a reaction of distrust and concern over the loss of skill-sets and background knowledge. For example: -

- The feeling of exclusion in the early days of the consultation process
- The lack of public meetings throughout the process
- The lack of inclusion of Parishioners by Parish Councils during the consultation phase (not within the NPA's control but nevertheless a perceived exclusion).
- The resignation of Richard Lemon as Director of Strategy and Planning at a critical stage of the process
- The appointment of Steve Avery (formerly Head of Development Control) as the new Director of Strategy and Planning at a key stage in the process
- The delay in appointing a replacement Head of Development Control
- The uncertainty of staff satisfaction and working conditions after revelations of an 'anonymous letter' with no apparent enquiry and outcome
- The noteworthy, but negative, Peer Review of 2008
- The shock resignation of Lindsay Cornish
- The resignation of Stephen Trotter as Director of Conservation, Recreation and Sustainable Development
- The Interim replacement of the above position perceived as not necessarily having the right background to carry the RMS forward
- The perception that the Interim Chief Executive's main task was to 'quieten' the vociferous factions either by 'capture & contain' or 'divide & rule' methods
- The appointment of a new Chief Executive with a strong conservation background who has yet to prove an ability to balance conservation equally within a living, working environment

These are all valid concerns of the general public and we feel that the Authority needs to continue finding innovative ways to connect with the people of the New Forest throughout all the stages of implementing the various plans. It needs to look at ways in which it can engage fully with the public alongside the more traditional routes.

The Interim Chief Executive has already started to build bridges in what seemed like an immeasurable chasm in June 2009 and most people believe that without his expertise and skill in moving things forward, we would be left with an unacceptable status quo. Compromises have been made and expectations may have been lowered; but there is now a firm foundation for the new CEO to build upon. This will no doubt be a great challenge for the incoming chief and not one for the feint-hearted but in our view it is vital that the ordinary people who live, work or visit the New Forest are made to feel included in its immediate and long term future.