

consultation lessons from the new forest

Alyson Gilbert-Smith and Samer Bagaen look at issues highlighted by a study of stakeholder consultation on the New Forest National Park Management Plan

The designation of the New Forest in southern England as a National Park in 2005 stemmed from a recognition that the area exhibited a special and remarkable natural beauty, calling for the highest level of planning protection. The New Forest National Park Authority (NFNPA) was required to deliver a National Park Management Plan (NPMP) – a comprehensive strategic document setting out the vision, objectives and plans for the area. Moreover, it was required to do so with input, engagement and support from key stakeholders who will be involved in its implementation. This article examines and analyses aspects of this stakeholder input, its effectiveness, and outcomes from the consultation process.

Once a National Park is designated, it is the responsibility of the National Park Authority to prepare, within three years after its operational date, an NPMP. But instead of the three years, the NFNPA took nearly five years to prepare the New Forest NPMP,¹ as a result of consultation issues and complaints raised by stakeholders, the rejection of the draft Management Plan, and the loss of several key NFNPA staff. The interplay between the parties to the consultation process was played out publicly in the form of meetings, protests, marches and rallies, oral and written presentations, letter and e-mail correspondence, and a petition signed by over 7,000 people opposing the draft Management Plan.

Research carried out by the authors examined the stakeholder consultation process, using critical discourse analysis as the principal research tool (see below).

The designation of the New Forest National Park

The New Forest National Park is the smallest of UK's National Parks, covering an area of 567 square kilometres (220 square miles) containing a

population of 34,935 people.¹ Nearly half of the New Forest is still owned by the Crown (managed by the Forestry Commission), the balance being held by the National Trust, Hampshire County Council, the Hampshire and Wildlife Trust and private owners.²

The decision to grant National Park status was not universally welcomed,³ and previous Government involvement in the area had resulted in a number of local demonstrations and protestations, most recently over the Lyndhurst bypass.⁴ In March 2005, the Secretary of State advised the NFNPA to develop a close working relationship with the Verderers of the New Forest⁵ and the Verderer's Court (which has statutory duties and powers under various New Forest Acts for the protection and administration of the rights of grazing or commoning and on the health of commoning animals within the New Forest), as any recreational or tourist development can only take place on commonable Crown land (managed by the Forestry Commission) with the Court's permission. Additional Ministerial guidance and formal advice was given to the newly formed NFNPA emphasising the role of community participation.⁶

Stakeholder consultation in the National Park

The New Forest Committee, formed in 1990 as a voluntary co-ordinating forum for the statutory bodies with interests and responsibilities in the New Forest, agreed to disband when the National Park came into existence. One of its documents, *Strategy for the New Forest*,⁷ formulated in 2003 in consultation with many organisations and individuals with interests in the New Forest, was maintained and adopted by the NFNPA as an interim management plan.⁸

August 2008 saw the release of the New Forest National Park Plan Consultation Draft into the public domain.⁹ The Consultation Draft integrated the Management Plan and Core Strategy into a single document. The public consultation period ran from 19 August to 14 November 2008, a period of 12 weeks and three days.¹⁰ 'In accordance with the Authority's adopted Statement of Community Involvement (Policy SCI-4), the Consultation Draft National Park Plan was circulated to statutory bodies, interest groups and Parish Councils within the National Park. The document (and supporting evidence) was posted on the Authority's website.'⁹

Our research revealed that it was tip-off information given by Sir Anthony Passmore, a New Forest Verderer, regarding the New Forest National Park Plan Consultation Draft publication and its 'controversial' equestrian-related contents that first

By the end of August 2008, the New Forest Equestrian Association (NFEA), formed in 1993 to fight against another equine-related proposal made in a Forestry Commission report, had written to the local press describing the new policies above as 'draconian measures', and had objected directly to the NFNPA, publishing its objection on its website.¹¹ The NFEA had been part of the 'New Forest, New Chapter' stakeholder consultations held in 2007/2008¹² but was not involved in two workshops that discussed recreational horse-keeping. Indeed, according to the NFNPA workshop participant list,¹³ it appears that only one equine-related stakeholder was involved, the New Forest Hounds. The other four equestrian-related stakeholders that attended workshops (including the NFEA) were all involved in a workshop entitled 'Understanding and Enjoying the National Park' that



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The New Forest is an area of special and remarkable natural beauty

prompted 'chatter' on a website forum. After inspecting the document via the NFNPA website, four women from the forum decided that 'somebody must do something about this', and met to discuss the matter on 18 August 2008. Following this initial meeting, the Forest Uprising Group (FUG) was formed. The issue for FUG centred around the proposed new policies on 'the control of recreational horsekeeping and associated development'.² What this meant was that in effect all landowners who kept equines for 'recreational' purposes other than just grazing would be required to enter the 'planning machine' to gain planning permission to keep their horses on their own land.

On 22 August 2008, just three days after FUG's founders' initial meeting, a public meeting organised by the group was attended by over 250 people. Although invited, the NFNPA did not attend. A petition was launched together with calls to other groups to object to the Consultation Draft.

had no equine content other than discussing access on horseback through the New Forest.¹²

Six weeks into the public consultation, a rally was held at the beginning of October, organised by FUG with support from other non-equestrian groups, local councillors and the general public. At the same time another local campaign group emerged, One Voice, originally formed out of concern over a New Forest wind turbine planning application, but aware of the Park Plan Consultation Draft and its implications. Over 100 people attended the One Voice meeting to discuss not only the Consultation Draft but 'in particular, the strategy of the NPA's consultation process'. One Voice stated that the 'NPA has to date shown a perceived arrogance and unwillingness to engage with the public on the Draft Consultation Plan and... the consultation process of 'stakeholder workshops' was not as robust as it should have been'.¹⁴

On 16 October 2008, the NFNPA held its first meeting since the commencement of the Draft Plan

consultation. The Chief Executive's report¹⁵ stated that the Consultation Draft had 'prompted scores of detailed media enquiries... over 1,500 copies of the plan have been posted to statutory bodies, individuals and other consultees for comment and there have been 22,300 downloads from the website'. According to the report, 'the team's work in September 2008 has focussed on the on-going consultation... responding to queries and logging responses'. There was no acknowledgement of any of the above events within the report.

The use of critical discourse analysis

Van Dijk¹⁶ describes critical discourse analysis (CDA) as 'a type of discourse analytical research that primarily studies the way social power abuse, dominance, and inequality are enacted, reproduced, and resisted by text and talk in the social and political context'. CDA involves the analysis of language used in text and the context in which it is created, unpeeling the layers within the choice of language and exposing messages of power and dominance that attempt to subordinate or neutralise the recipient.

However, as described by Mehan *et al.*,¹⁷ the effect of language intended to subordinate can be quite the reverse, in that 'the relations between voices in public political discourse take the form of a conversation, a dialogue in which discourse strategies or moves on the part of one organisation provoke responses from others'; in the words of Flyvberg,¹⁸ 'Rationalization presented as rationality is a principal strategy in the exercise of power'. In other words, the discourse that develops between the participants stimulates moves and counter-moves or 'power posturing'. Our study used CDA techniques to analyse excerpts from key texts exchanged between the stakeholders and NFNPA and so examine the power play going on between participants.

We studied the language in the selected texts (published text, in-depth transcriptions of semi-structured interviews with representatives from the NFNPA and stakeholder groups, together with key unpublished correspondence exchanged during the period of consultation) at a level that allowed underlying or latent meaning to be exposed – the analysis was not only undertaken at a semantic level (i.e. the study of meaning through language), but also at a thematic level, where the emergence of themes was assessed within the context of the case study.^{19,20} This was achieved by studying text construction; sequencing and grammar; the use or avoidance of certain words or phrases; speech acts, where certain verbs are utilised to instigate action (for example, enquiring, demanding, securing, delivering); the complexity of the language (often used to exhibit power and knowledge, thereby undermining the confidence of the receiver); and the subject matter and content and the interplay

between the participants. We also took into consideration contextual matters such as setting, participants, timing and gender.

Text excerpts were analysed using CDA and Lakoff's women's language checklist.²¹ This dual approach enabled us to scrutinise texts in a holistic manner and not just as a linguistic exercise.

The chosen texts included exchanges between one of the lobby groups in the National Park, One Voice, and one senior representative from the NFNPA, generated as a result of the stakeholder consultation – both were key powerful players in the consultation process for the preparation of the New Forest National Park Management Plan. Also highly relevant was an anonymous 'whistle-blowing' letter from employees of the NFNPA to the Department for Environment, Food and Rural Affairs, which was chosen to add a further dimension to the power struggle debate.

Findings – implications and opportunities

Our research into stakeholder input, its effectiveness and outcomes during the consultation process to deliver a New Forest NPMP has revealed several important findings. Our first finding commends the NFNPA because it was the first National Park Authority to attempt to combine a National Park Management Plan and Core Strategy into one document, taking the opportunity to save public funds.

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The second finding is that an appropriate stakeholder identification process was not conducted, as the *Strategy for the New Forest* stakeholder list used was five years old, having been compiled in 2003. This left newly formed groups unrepresented. 'Hard to reach' groups, including youth groups and the business community, were also not included because they were not identified and therefore not invited.²² This left the general public with a sense of exclusion, resulting in alienation and overall mistrust of the NFNPA's motives. For future processes, thorough research is required to identify all key stakeholders.

The third finding concerns anomalies in stakeholder selection. Guidelines issued by the Countryside Agency in 2005²³ stress the

importance of engaging key stakeholders and the wider community and highlight various levels of engagement (following Arnstein's 'ladder of participation'). 'Bounded dialogue' is proposed for the preparation of National Park Management Plans, meaning decisions should be influenced by stakeholders.²³ Attendance at the 'New Forest, New Chapter' stakeholder topic group workshops appeared to be by invitation-only to pre-selected participants, leaving the wider community unable to participate. For example, only one of the two workshops that discussed recreational horse-keeping were attended by an equestrian-related stakeholder.

The fourth finding is that the preparation and delivery of National Park Management Plans needs much more than simple consultation. It requires the influencing and sharing of decisions by stakeholders. Simply relying on Parish Councils as the conduit for public consultation and engagement with the wider community is not a sufficiently robust approach. The campaign group One Voice argued that the NFNPA did not appear to engage, listen or communicate with any group or individual during the consultation process, in spite of receiving numerous invitations to do so.

The fifth finding is that the proposed policy for recreational horse-keeping did not feature as a 'big issue' at the inaugural workshop of the 'New Forest, New Chapter' consultation, yet it appeared as a 'policy' to be debated in two out of the three topic group workshops. The recreational horse-keeping policy was also not mentioned in the concluding event report.

Overall, the fundamental flaws in the preparation and management of the stakeholder consultation process outlined here undermined the spirit of consultation. The result was considerable local conflict and unrest, rejection of the New Forest National Park Plan Consultation Draft, further stakeholder engagement, the loss of office of key NFNPA staff, and a considerable delay in the delivery of the Management Plan. It is hoped that lessons will be learnt by South Downs National Park, as it prepares to embark on a similar programme of stakeholder consultation.

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Notes

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- 2 *New Forest National Park Plan Consultation Draft*. New Forest National Park Authority, 2008
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- 5 See 'Forest Rights'. Webpage. Verderers of the New Forest. www.verderers.org.uk/rights.html
- 6 *Explanatory Memorandum to the New Forest National Park Authority (Establishment) Order 2005*. Department for Environment, Food and Rural Affairs, 2005
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