# MINUTES of the meeting of Overview and Scrutiny Committee held at The Council Chamber, Brockington, 35 Hafod Road, Hereford on Friday 9 December 2011 at 10.00 am

Present: Councillor A Seldon (Chairman)

**Councillor JW Millar (Vice Chairman)** 

Councillors: AM Atkinson, PL Bettington, WLS Bowen, MJK Cooper,

PGH Cutter, EPJ Harvey, MAF Hubbard, RC Hunt, TM James, Brig P Jones CBE,

JLV Kenyon, R Preece, SJ Robertson, P Rone and PJ Watts

Statutory Co-optees

Miss E Lowenstein

In attendance: Councillors PJ Edwards, J Hardwick, JG Jarvis, RI Matthews, C Nicholls,

FM Norman and DB Wilcox- Cabinet Member (Environment, Housing and

Planning)

### 39. APOLOGIES FOR ABSENCE

Apologies were received from Mr P Burbidge.

### 40. NAMED SUBSTITUTES

There were none.

# 41. DECLARATIONS OF INTEREST

There were none.

### 42. MINUTES

RESOLVED: That the Minutes of the meeting held on 28 November 2011 be confirmed as a correct record and signed by the Chairman.

# 43. SUGGESTIONS FROM MEMBERS OF THE PUBLIC ON ISSUES FOR FUTURE SCRUTINY

The following suggestions were made:

- That the possibility of creating an eastern bypass for Hereford along a route close to the Aylestone Ridge should be explored.
- That the quality of Council surveys and the user of results of surveys should be examined.

## 44. QUESTIONS FROM THE PUBLIC

Specific Questions received in advance of the meeting relevant to the item under discussion and answers to those questions were circulated at the meeting and are appended to the Minutes.

It was noted that some submissions received had expressed opinions but contained no questions. Some had contained questions not relevant to the item under discussion at the meeting. All correspondence submitted for consideration at the meeting was provided to Members of the Committee on the day of the meeting.

### 45. LOCAL DEVELOPMENT FRAMEWORK CONSULTATION PROCESS

The Committee was invited to consider the legal requirements governing consultation on the Local Development Framework (LDF) and the consultation process undertaken to date by the Council.

The Head of Strategic Planning and Regeneration (HSPR) gave a presentation. A copy of the presentation has been placed with the agenda papers in the Minute book.

In discussion by the Committee the following principal points were made:

- The Cabinet Member Environment, Housing and Planning commented on the extent of the consultation that had been undertaken over the past four years. He emphasised that in undertaking the latest consultation the view had been taken that there should be a focus on those areas where the proposals had changed, making arrangements for consultation meetings in agreement with Ward Members. He considered that, whilst there was always room for improvement, the Council had gone much further than the Regulations required it to do.
- A Member criticised the consultation arrangements in Leominster and in particular the decision for officers not to attend a public meeting. The Assistant Director Economic, Environment and Cultural Services (ADEECS) commented that consideration had had to be given to how best to deploy the available resources. There had been no significant changes to the proposals that affected Leominster. The matter had been discussed by the Local Development Framework Working Group and three of the four Ward members had not considered a public meeting to be necessary. The Local Development Framework had been included on the Town Council Planning Committee agenda and Officers had attended that meeting. In Ledbury where a request from the Town Council for a public meeting had been received all Ward Members had supported this and officers had attended.
- A Member criticised the process suggesting that not all the relevant information had been included in the consultation documents, for example a map showing the preferred route for the relief road,
- It was suggested the process had not taken sufficient account of the need for the provision of infrastructure by statutory undertakers. In reply it was stated that this would be considered as part of any future planning application.
- A Member suggested that there had been insufficient explanation of Cabinet's decisions in July and September on the Local Development Framework.
- A Member sought clarification on how consultees including businesses were identified. Officers explained the basis on which consultees had been identified and notified. It was noted that the list of consultees had been expanded at each round of consultation to include all those who submitted responses. They were then notified as part of subsequent consultations
- The HSPR said that he thought the consultation process that had commenced in 2007 had worked well and generated a good response. He also considered that

efforts had been made to engage with hard to reach groups and seek views from the County as a whole.

• The rationale behind the most recent round of consultation which had involved issuing a leaflet, with supporting information being available on the web, and inviting response by letter was questioned. Some concern was expressed that the leaflet had not included sufficient detail and was difficult to follow for anyone who had not previously engaged with the process. In addition it was suggested that the approach used was not in accordance with the public's preferred means of communication and response identified within the Council's Statement of Community Involvement (SCI).

The HSPR commented that a considerable response had been received from the place shaping consultation in 2010. The aim in this latest consultation exercise had been to emphasise the changes to the preferred option. It had been decided that a leaflet written in accessible language was the most suitable way to do this. supported by more detail on the website and by ward based and public meetings where appropriate. He stated that this was the latest stage in an extensive consultation process during which a wide range of consultation methods, as described in the SCI, had been deployed.

The ADEECS emphasised that the latest round of consultation had been the sixth phase of consultation. Careful consideration had been given to the approach and various groups had been invited to comment on the draft leaflet. The information presented on the website was comprehensive and accessible and enabled people to make informed judgments.

- Officers commented that they saw nothing untoward or unexpected in the fact that opposition to the plan had materialised at the later stages of the consultation process once further detail of the proposals and their effects on individuals had become clearer.
- A Co-opted Member stated that the Council needed to undertake a fundamental review of its approach to consultation. Suggested failings included an insufficiently proactive approach and insufficient stakeholder analysis. The Council could therefore not be sure that it had had sought and received representative views.
- The HSPR commented that the statute required the Council to take account of representations. The public response had to be considered alongside a range of technical considerations. He also had to have regard to the resources available to him. The ADEECS commented that the latest round of consultation had reinforced his view that the key issues had been identified and had justified the resources used throughout the process.
- A Member outlined a number of difficulties she had encountered in seeking to access material on the website. She also highlighted that staff in her local Info Shop and Library had been unaware of the consultation and unable to advise upon it. An officer within the planning department had himself had difficulty navigating the documentation which she considered could best be described as impenetrable. This raised questions about the extent of any planning undertaken on the website design. She had asked that the Committee examine the process before launching this latest round of consultation. Her findings indicated that this would have been a valuable exercise and it was to be regretted that the Committee had not agreed to undertake it.

The HSPR welcomed the fact that these issues had been highlighted in the early weeks of the latest consultation process and steps had been taken to address these issues.

- There were some favourable comments on the consultation process and the professionalism of officers.
- That a considerable amount of paperwork had been issued to Members on the morning of the meeting which it had been impossible to assimilate in the time available.

(The meeting adjourned between 11.58 and 12.06.)

As referred to in Minute no 44 above questions received in advance of the meeting and answers to those questions were circulated at the meeting. Members of the public were invited to make any additional comments. The following principal points were made:

- The Committee was asked whether it was satisfied that the background papers were of sufficient standard.
- It was suggested that it was difficult to separate the consultation from the content of the plan, because the content of the plan had influenced the consultation process.
- The preparation and objectivity of the Plan's evidence base and its communication to the public were critical aspects of sound plan-making: There should be a review of how the evidence base for the plan was prepared and presented before further options were put to the public. This should include independent scrutiny by stakeholders before the Plan was put before the public and then a commitment to properly informed debate.
- There should be a review of the entire LDF process.
- Concern was expressed about the position regarding updating the Local Development Scheme and clarification sought.
- Clarification was also sought on the operation of the LDF Task Group.
- Clarification was sought on how changes to the timetable for the preparation of the Local Development Framework and Local Transport Plan were agreed.
- A concern was expressed that pressure on staff resources meant that there was a risk that further work would not be as thorough as was desirable.
- Concern was expressed about the refusal of officers to attend public meetings about the proposals. The view was expressed that the Council had not really engaged with the public.
- Changes to documents had taken place during the consultation process. It was asked whether people should therefore be given a further opportunity to respond.
- It was suggested that those specifically affected by proposals should have been directly informed.
- There was no evidence to show that the consultation had engaged with and reached a representative sample of the population.
- That a critique of a report commissioned by the Council on renewable energy potential in the County has been dismissed on the grounds that it had been

submitted after the consultation had closed. It appeared that only evidence commissioned by the Council was included in the evidence base.

- The Council had refused to make its Info caravan available to allow volunteers to provide material to the public in High Town, Hereford.
- It was asked when information on the relief road route corridors be known.

Officers made the following observations in reply:

- The Council had followed the legislative requirements. The meeting had been informed of two independent assessments of the process, both of which had been favourable.
- Whilst the Council had not made its Info caravan available in High town, Hereford it had allowed various groups to use the exhibition space.
- The process had generated a range of responses and was considered to have brought out the key issues in the County.
- It was intended that the core strategy would be considered by Council in July 2012 and would contain route corridors.
- The LDF timetable was necessarily kept under review and some changes had been made by Officers in discussion with the relevant Cabinet Member.
- It was noted that the next opportunity to make representations would be upon the final draft plan following Council approval. This process was prescribed in Regulation 27 of the relevant Regulations. Representations would be submitted to the Planning Inspector not the Council.

The Committee was invited to consider whether it accepted the Council had met the legal requirements placed upon it. The importance of adherence to the SCI was discussed. The Head of Strategic Planning and Regeneration commented that the Council had committed itself to following the SCI it had produced. The Planning Inspector would consider whether the Council had indeed done so in judging the soundness of the process.

The Head of Governance, in his capacity as Deputy Monitoring Officer, commented that the test to be applied was whether on the balance of probabilities the process followed was likely to withstand legal challenge. On the basis of the evidence presented to the Committee he considered that it would.

Members of the Committee were invited to put forward recommendations to improve the Council's consultation process in the light of comments made during the debate.

Officers noted in response that the requirements of Regulation 27 of the Planning Regulations 2008 that would govern the next phase of consideration of the LDF were very specific and it would not be possible to accommodate all the Committee's proposals in that specific process.

The Deputy Chief Executive commented that the Committee had, however, identified a number of basic principles that should be applied to the Council's general consultation processes and these would be followed up with the Assistant Director, Customer Services and Communications.

The Chairman thanked all those who had contributed to the meeting.

#### **RESOLVED:**

### That

- (a) it was accepted that the evidence presented supported the view that the process to date was sound;
- (b) prior to a consultation process commencing it should be road tested to ensure that all relevant staff who would have to explain the subject of the consultation to consultees were fully briefed and capable of providing any necessary explanation of the consultation details;
- (c) an easily accessible consolidated set of documentation in both electronic and printed form should be provided for all consultations using clear and understandable language;
- (d) the way in which ICT was used in managing consultation documentation and ensuring its accessibility should be reviewed to ensure material was dated, stored and displayed in an accessible way, including where practicable the use of a search facility such as post codes and signposting;
- (e) work should be undertaken to ensure that consultation exercises reached as wide an audience as possible drawing on analysis held by the Council on how people preferred to receive information and interact with the Council;
- (f) more use should be made of Community Access Points;
- (g) that it should be standard practice that feedback to consultation exercises should be sought through a structured questionnaire highlighting the key issues, inviting consultees to tick a box indicating whether they strongly agreed, agreed, disagreed etc with the particular proposal and also providing a comment box for each proposal, with an opportunity for those who would rather respond by letter also being provided;
- (h) a comprehensive communication plan should be put in place for consultations:
- (i) a strategy should be developed to seek to increase the response rate from hard to reach groups;
- (j) the Council should make more use of social media to communicate with residents;
- (k) high level statements should be supported by evidence and links provided to that supporting evidence;
- (I) as an automatic part of consultation processes individuals and landowners should be notified of specific proposals that might affect them in the same way as they would be notified of a planning application;
- (m) Consultation exercises should ensure a proactive engagement with all relevant stakeholders and seek to ensure that the response is representative of the County's demographic profile; and

(n) that in relation to the LDF the Council should seek to get maximum support for proposals from across the whole population of the County to enable a strong case for funding to be made and so allow implementation to proceed as swiftly as possible.

The meeting ended at 12.55 pm

**CHAIRMAN** 

Questions	Responses	
why "Here for Hereford" were refused the use of the Information caravan by Herefordshire Council as the group could not be counter to policy in this situation?	The Council took a policy view that it would have been inappropriate to hire its exhibition trailer to assist in the promotion of activities that run contrary to Council policies and consultation programmes. The Council was however willing to allow Here for Hereford to use the exhibition space in High Town Hereford subject to the usual application procedure, charges and conditions for doing so.	Pat Churchward
How were the original consultees selected? Why were they selected?	An extensive database of consultees has been developed which dates back to the preparation of the Herefordshire Unitary Development Plan and the Statement of Community Involvement. The preparation of these documents enabled the identification of a large number of organisations and individuals with an interest in the future development of the County and was used, in association with the requirements of the development plan regulations to engage with specific consultation and general consultation bodies, as the initial basis for consultation upon the Core Strategy.	Simon Brown
Why was the whole county not consulted as was the case in this final round of consultation?	Of the six consultations undertaken 5 have been undertaken on a county-wide basis. However, the Preferred Option consultations of 2010 were undertaken on a targeted basis with consultations undertaken with those who had shown previous interest in a specific place or subject area. Such an approach is in full accord with advice in Planning Policy Statement (PPS) 12. Subsequently as the consultations have been progressed other organisations and individuals who have engaged in the process have been added to the database.	Simon Brown
Why were adverse comments relating to the very low number of the original consultation ignored?	All comments received during the consultation processes have been considered. Generally, as consultations have become more specific during the plan making process the numbers of consultation responses have increased.	Simon Brown
Why did Cllr. Blackshaw publicly deny at an IOC meeting in Leintwardine just before the 5 May 11 election that the consultation had been less than perfect and say that it had been "widely acclaimed as being of a very high standard"? What evidence can Cllr Blackshaw produce to support such a statement?		Simon Brown
As resident of Bromyard and a potential victim of property devaluation resulting from the recommended Housing Development at Hardwick Close, please can you advise me where a detail location plan can be viewed because somewhere, someone has one pinned to his or her office wall.	The most recent plan available for the proposed housing at Bromyard is in a document entitled 'Draft Preferred Options: Bromyard, Ledbury, Ross-on-Wye July 2010'. It is available in the Core Strategy section of the Council website. This is a link to this document: http://www.herefordshire.gov.uk/docs/Market_Towns.pdf There is background information, as well as the proposed policy for Bromyard with a map on Page 12 of the broad location of Hardwick Bank proposed housing site. For the purposes of the Core Strategy a broad location of proposed development is sufficient rather than a detailed location plan.	Tony Stanton

At various public meetings, and during the BBC H&W public debate, Cllr Jarvis described the proposed WIRR as the "bypass". Does the O&S committee agree that Cllr Jarvis has thus repeatedly misled the public, and that, given the LDF brochure and HC's careful emphasis on a WIRR and the very different implications of the two in terms of planning and public perception, this calls into question the validity and the legality of the consultation process?	The Hereford Relief Road will provide a number of benefits to the operation of the city's highway network, one of which is the provision on an alternative to the existing A49 truck road and thus providing a 'bypass' function for through traffic. The primary function of the road will be to distribute and manage traffic in Hereford to enable the growth proposals and the provision of sustainable transport	Anthony Powers
As the element in the LDF dialogue most likely to reach the largest audience, why was the BBC H&W public debate scheduled to take place and to be broadcast after the closing date of the consultation process?	The Hereford and Worcester Radio debate was organised by the radio station and not Herefordshire Council. Council members and officers were invited to attend.	Anthony Powers
Wye, I face having my home or land possibly compulsorily purchased and demolished or directly affected by the LDF plan proposals. To date even though we are rate payers to Herefordshire Council we have not been directly contacted by the Council about the plan and its implications. At a public meeting officers said that they had been engaged in many discussions	The proposal for the Hereford Relief Road was contained within the Hereford preferred options (September 2010) and 'Help plan the future of Herefordshire' leaflet (Sept 2011). The Council is proposing a 'preferred corridor' for the Hereford Relief Road in which further assessment can take place to define a specific route alignment. At this stage, no final decision has been made on the principle of the road's alignment or its detailed route. Consultation periods have been undertaken on both the preferred options and the revised preferred options, the details of which can be seen within the report to Overview and Scrutiny Committee . The Core Strategy is a countywide strategy and will potentially impact upon all residents within Herefordshire. Consultation is undertaken with this in mind. Details of the proposal have appeared within Herefordshire Matters, which is delivered to all Herefordshire households and within the local press. A number of public events have also been held in the Three Elms area during the consultation periods .	Mrs Jackie Morris
Is it normal to introduce a third route during the consultation period on the other two? Do the council not see how the effect was to totally wrong foot all those who would have objections to the third option? Do the Council not understand that to those of us who have discovered so late in the day what they have done, it looks like a deliberate attempt to mislead us and to avoid fielding our opposition?	The western inner corridor for the proposed relief road was included within the Hereford Preferred Options consultation in September 2010. Following comments received, further consultation has been undertaken on a revised southern corridor which allows for the former bypass route in this location to be considered. The Revised Preferred Option Background Paper (appendix 4) shows the former bypass route, with a minor adjustment to realign it to the A49/Rotherwas Access Road junction. This will enable the full range of route options to be evaluated in the route selection and route design phases. The consultation on the Revised Preferred Options ran from September to November 2011. The results of the consultations will be taken into account in determining the extent of the corridor to be included within the submission Core Strategy.	

Should I have made it my business to meet the three Councillors, rather than to speak only to planning officials, if I am serious about having my voice heard on the routing of the scouthern relief road? Is this how things are done in this County that I have recently moved to?	Local councillors are available as a normal part of ward business to discuss the full range of local	Tom Packham
My Parish Council includes the owner of Haywood Lodge on its committee. Is my complaint that my Parish Council seems to be mute on the subject of the preferred option route, a matter between me and the Parish, or is the O&S committee also interested?	The question of whether an individual Parish Council chooses to respond to the consultation is clearly a matter for the Council concerned. However, all Parish Councils in the County received invitations to ward-based consultation events. That for Hollington ward was held on 9th November.	Tom Packham
Is the wider Council aware that its planning officials are telling potential house buyers one thing about the impending routes, without knowing about the routes being tabled by officials at a higher level and with some apparently privileged property owners?	The information given at the time was correct. It is emphasised that at this stage no final decision has been made on the principle of the road's alignment or its detailed route.	Tom Packham
If the Council was to take the extra-ordinary step of introducing a third route so close to the end of the LDF Consultation period, should it not have made every effort to inform those who would be affected? Does the Council not see how those that they apparently sought to marginalise from the discussions are now incensed at their exclusion, and are now so much more resolved to insist that the process is handled properly from now on?	The amended southern corridor was part of the revised options for the Core Strategy . Consultation on these revisions took place between September and November 2011, the full details of which are contained within the report to the Overview and Scrutiny Committee. The Core Strategy is a countywide strategic document and is consulted upon across the county.	Tom Packham
Do the Council not accept that they should have issued the map themselves, and not leave it to a group of householders who naturally oppose the newly introduced route?	As the Core Strategy is not an OS based planning document, these broad corridors will only be shown in a diagrammatic format on the key diagram. For this purpose the consultation document showed the revised southern corridor in a diagrammatic way. The Study of Options corridors / routes are shown on an OS base but these are only study corridors identified for the purpose of the plan making process and not defined routes. The revised options background paper identifies the former bypass route.	Tom Packham
As a 6th Former and someone who the plans will have a fundamental impact on as they cover the next 20 years and issues such as jobs/affordable housing/transport etc, what engagement with young people was organised by Herefordshire Council to raise their awareness of this important consultation. For example were any events organised by Herefordshire Council at say the 6th Form College/Tech College/Art college or any of the local secondary schools to widen the consultation across all age range	Throughout the plan preparation process there has been engagement with young people through visits to schools and colleges and at public meetings with organisations such as the Young Farmers (these are set out in the consultation statements). The Revised Preferred Option consultation concentrated upon holding ward-based events and did not focus upon specific sections of the public.	Tom Allen

When I tried to find the leaflets they were not readily available in the library but only on display upstairs in the reference section and the background papers were not widely available which explained the detail behind the new proposals. I feel that this excluded many elderly and some disabled people from readily accessing the information, particularly if they have no access to the internet.	Leaflets were distributed to all libraries and Info Offices in the County and copies were regularly despatched to these offices to keep them supplied with copies. Staff were briefed to inform the public regarding the consultation.	Tom Allen
Each time during the LDF consultation an article apparently appeared in Herefordshire Matters. This last time the article appeared this Nov (2011) it was delivered just over one week before the consultation closed. Is this really adequate time and publicity for such an important issue that affects so many people?	Herefordshire Matters was only one of the methods used to inform the public regarding the Revised Preferred Option consultation. As the publication is only produced on a quarterly basis both the Autumn edtion, which was published in August (prior to the beginning of the consultation period) and the winter edition published in November contained summary details of the Revised Preferred Option.	Tom Allen
Do the consultation responses from Herefordshire voters represent the views of the population of voting age, give evidence for your answer.	The consultations undertaken provide the opportunity for organisations, stakeholders and residents to have their say in the process of preparing a strategic plan for Herefordshire. The responses can therefore only be considered to represent the views of those who have engaged in the process and not any wider group.	Pete Linnell
As the chair of Breinton Parish Council I first requested that the LDF PROCESS be reviewed back in September 2010 as our parish had concerns about essential evidence not being available to support the previous plan and the lack of transparency as to how the plans were taking account of the feedback from earlier consultations. In July 2011, I highlighted to this committee that reports on the written feedback on the Hereford Preferred Option from the consultation in 2010 were still not available 7 months after the consultation had been completed. However, a revised draft plan document emerged just one month after these responses became available to the public. The autumn 2010 consultation overwhelmingly rejected the preferred options for Hereford and yet the plans for the "revised" preferred option seem little changed.i) Would someone please explain how the responses from the earlier consultation were incorporated into the latest plan? And if not, why not? ii) Why was the "revised preferred option background paper" changed and issued in October after the consultation in 2011 had started in the September?	The Revised Preferred Option suggests a number of significant changes to the Preferred Strategy such as reducing housing targets and amending or deleting strategic housing locations. Amendments to the Draft Revised Preferred Option Background Paper were not completed until October 2011.	E Morawiecka

A number of important issues highlighted by both statutory and public responses to the 2010 consultation such as water, sewage and hospital bed capacity, air quality, CO2 emissions and traffic congestion still remain unresolved even though a second consultation has been completed at considerable expense to the tax payer:- i) why was the revised plan and the consultation not delayed until these important unresolved matters on basic services were resolved? ii) When will the concerns over the delivery of these vital services be resolved and what impact will this have the revised plan?	The preparation of the Core Strategy is an iterative process. It is not possible to have all issues resolves at the outset but it is important to consider appropriate amendments to a plan through the plan making process and consult upon them. The Plan as submitted to the Secretary of State will need to have a sound basis for its policies and proposals and will then be subject to independent scrutiny at an Examination in Public.	E Morawiecka
In view of the fact that the Council has already agreed to stray from its revised LDF timetable (the one that is now running two years' late) and postpone the consultation on the Transportation Strategy, and at the same time draft (and perhaps consult on?) the Hereford Area Plan, the Market Towns and Rural Areas Plan, the Minerals and Waste Plan, the EUcompliant Strategic Environmental Appraisal, the CIL charging schedule and the Infrastructure Delivery Plan, all in time, supposedly, for consideration by the Overview and Scrutiny Committee in March 2012, can the Committee confirm that there will be no further delays to this revised LDF timetable?		Victoria Wegg- Prosser
What are the implications for the reliability of consultation results - and thus soundness and progressing the Core Strategy - if the consultation documents contain misleading or erroneous statements? What procedures has the planning department adopted to check for and eliminate misleading or erroneous statements? Shouldn't consultation materials put before the public give a concise summary of the results of previous consultations, and doesn't this latest version discourage people from responding to consultations, when their views are ignored, concealed and misrepresented?	comments made by people attending various public events held during the consultation period. The consultation upon the Revised Preferred Option has not discouraged a significant response as evidenced by the number of people attending events and	Paige Mitchell
Why does the Council repeatedly consult on policies for which the evidence base is not yet complete or available, or the viability not yet established? The public may agree policies that are not deliverable for regulatory or ecomonmic reasons, then what will the Council do?	The preparation of the Core Strategy and its evidence base is an iterative process. It is not possible to have all evidence produced in full at the outset of the process. Some evidence needs regular updating while "gaps" in evidence often become apparent through the analysis undertaken following a consultation process.	Paige Mitchell

Is the Committee satisfied that the public are given the information they need to be able to respond to consultation documents beyond a summary of their previous response - when the evidence is highly technical and when there appears to be no established procedure of supplying nontechincal summaries? Is the Committee satisfied that the public are given adequate information about the legal framework and related guidance for development plans and in particular for the Core Strategy Preferred options?	It is accepted that the plan making process is complex and a judgement is required as to how much detail is contained within consultation documents. Technical details are generally set out in the evidence base and background papers to enable the consultation documents to be written in as non-technical manner as possible.	Paige Mitchell
Why has no attempt been made to harness other consultation means; i.e. email, social media, etcon such an important issue? Where is the specific response to the LDF from the under-represented groups?	As part of the process the LDF email address has been printed and advertised on all LDF correspondance and advertisements. In preparing the Statement of Community Involvement consultees indicated they would generally prefer to receive letters through the post and hard copies of documents during consultation. Throughout the process attempts have been made to try and engage with the hard-to-reach groups including working with the local access groups, schools and colleges and gypsy and travellers support group amongst others detials of these are set out in the consultation statements.	Amanda Attfield