

Report to the Chief Officer (Highways and Transportation)

Date: Subject: Design & Cost Report for S278 Works Associated With The Merrion House redevelopment, Leeds

Capital Scheme Number : 32261

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): City and Hunslet	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. Planning permission 14/01825/FU was granted on 25th November 2014 for an extension to and refurbishment of Merrion House, Leeds
2. Highway improvement works will provide a lay-by on Merrion Way shown on drawing (0-)A101 Rev P General Arrangement Upper Ground Floor Plan with a traffic regulation order to make it available for drop off and pick up and disabled parking.
3. A contribution will be made towards widening of the footway on Clay Pit Lane shown on drawing 1307/GA/01 Rev A Footway Improvements in conjunction with a wider Council project.
4. To meet the requirements of the planning permission the applicant has requested that Leeds City Council, as Highway Authority, enters into a Section 278 Agreement to enable the highway works to be carried out.

Recommendations

5. The Chief Officer (Highways and Transportation) is requested to:
 - i) note the principles of the highway works to provide a lay-by on Merrion Way for drop off / pick up and disabled parking;
 - ii) to approve an injection of £16,000 into the City Development Department Capital programme for the Merrion Way works;

- iii) give authority to incur expenditure of £6,000 TRO costs and £10,000 staff checking and inspection costs, all to be fully rechargeable to the developer through the Section 278 agreement;
- iv) request the City Solicitor to advertise a draft traffic regulation order to make part of the lay-by on Merrion Way limited waiting and part disabled parking and, if no valid objections are received to make, seal and implement the order as advertised;
- v) approve the inclusion of an obligation in the S278 Agreement for the developer to pay to the Council the sum of £102,418 towards the Clay Pit Lane and Woodhouse Lane junction improvement; and
- vi) give authority to negotiate the terms of and enter into an agreement with the developer under the provisions of Section 278 of the Highways Act 1980.

1 Purpose of this report

- 1.1 The purpose of this report is to note the principle of the implementation of highway works associated with the refurbishment and extension of Merrion House.
- 1.2 To obtain authority to negotiate the terms of and enter into an Agreement under the provisions of Section 278 of the Highways Act 1980, whereby the associated highway works are designed and constructed by the developer at their expense, with the Council checking the design and construction, with step in rights and preparing a Traffic Regulation Order at the developer's expense.
- 1.3 To request the City Solicitor to advertise a draft traffic regulation order and if no valid objections are received to make, seal and implement the order.

2 Background information

- 2.1 Planning permission 14/01825/FU was granted on 25th November 2014 for an extension to and refurbishment of Merrion House, Leeds
- 2.2 Highway improvement works will provide a lay-by on Merrion Way shown on drawing (0-)A101 Rev P General Arrangement Upper Ground Floor Plan.
- 2.3 A major Council scheme at the junction of Clay Pit Lane and Woodhouse Lane will benefit from a financial contribution from the development in respect of its impact.
- 2.4 To meet the requirements of the planning permission the applicant has requested that Leeds City Council, as Highway Authority, enters into a Section 278 Agreement to enable the highway works to be carried out.

3 Main issues

- 3.1 The proposed development will involve the refurbishment of Merrion House and include an extension on the western end of the building at the junction of Clay Pit Lane and Woodhouse Lane. The building, once complete will be occupied by the Council, the ground floor will be occupied by the one-stop shop service. The one stop-shop in particular will generate the need for the drop off and pick up of customers by taxi. Highway improvements have been agreed as part of the planning consent consisting of the provision of a lay-by on the southern side of

Merrion Way near to the proposed new main office doors to the building, this will provide space for 3 cars to drop off and pick up passengers, controlled by a limited waiting order and space for 5 'blue badge' holders to park, controlled by a disabled parking order, replacing the current facility on Merrion Way that is problematic to the entry and exit of vehicles at the adjacent multi storey car park and is frequently suspended on the days of arena events, the traffic regulation order on that parking will be changed to no waiting or loading at any time. The works are shown on drawing (0-)A101 Rev P General Arrangement Upper Ground Floor Plan. The developer will design and construct the lay-by, the council will check the design and construction of the works and implement the traffic regulation order, the developer will meet the full cost of the Council's work estimated to be £6,000 traffic regulation costs and £10,000 fees.

- 3.2 The existing footways around the building are narrower than normally required for a busy city centre, additionally the public realm area adjacent to the building that currently provides an alternative route from Woodhouse Lane to the existing doors into Merrion House will be built over by the extension further increasing pedestrian movements on the surrounding footways. There is a high footfall related to student activity, the route into the city from Woodhouse Lane car park and customers for Arena events. The relocation of the Council's offices will further increase pedestrian movement.
- 3.3 It was agreed through negotiations on the planning application that there was a need for the footways to be widened around the building to address the impact of the development, however there was little opportunity to achieve this in isolation.
- 3.4 The redevelopment of Merrion House proved to be a catalyst for the Council to review the layout of the Clay Pit Lane / Woodhouse Lane in a wider context, to improve the public realm, provide a much better pedestrian environment than could be achieved through the Merrion House development alone and to integrate with the NGT proposals. The proposals will be designed to avoid the need for pedestrian guardrail, unless absolutely necessary for road safety reasons.
 - 3.4.1 The planning consent for Merrion House includes planning condition 11, requiring a footway improvement shown on drawing 1307/GA/01 Rev A Footway Improvements, however, through negotiation it has been agreed with the Chief Planning Officer that this condition can be discharged by the payment of a contribution of £102,418 to the Council's scheme. There is not a mechanism within the planning consent that formally controls this, as a result the S278 Agreement will be the control for the payment of this sum.
 - 3.4.2 Additional financial contributions are provided from the Merrion House development towards the Woodhouse Lane / Clay Pit Lane scheme through the S106 Agreement attached to the planning consent consisting of a public transport contribution of £42,582 and a public realm contribution of £80,000, injection of this money into the capital programme will be dealt with by a separate report. The overall contribution to the Clay Pit Lane Woodhouse Lane from the development will be £225,000.
 - 3.4.3 The area of public realm where the office extension is to be built is not highway, the area has been maintained by Town Centre Securities and is not considered to have become highway through use, neither the Street Register nor public rights of way records show the area to be highway, however there is some tidying up of the

highway boundary required around the building footprint that involves a narrow strip of highway to be stopped up adjacent to the extension that is currently being advertised under S247 of the Town and Country Planning Act 1990 and adoption of the area between the existing back of footway on Merrion Way and the new building footprint, which will be included in the S278 agreement.

3.5 It is proposed that the developer will enter a Section 278 Agreement with the Council, the S278 Agreement will consist of two elements:

3.5.4 Firstly to deal with the Merrion Way lay-by provisions whereby the developer will design and procure the highway works at their expense and the Council will check the design of the work and inspect the construction, with step in powers should the works not be managed or constructed to appropriate standards.

3.5.5 Secondly, the agreement will control the receipt of a contribution of £102,418 in discharge of condition 11 of the planning consent towards the Clay Pit Lane / Woodhouse Lane junction.

3.6 Section 278 of the Highways Act 1980 allows Highways Authorities to enter into agreements with developers for the execution of highway works at the developer's expense. The preconditions for an agreement under Section 278 of the Highways Act 1980 are, first, that the Highway Authority should be satisfied that it will be of benefit to the public to enter into an agreement for the execution of the works and, secondly, that the work must fall within the Highway Authority's powers of road building, improvement and maintenance.

4 Corporate Considerations

4.1 Consultation and Engagement

4.1.1 Ward Members: Ward Members were consulted by email dated 10th December 2014. One Ward Member responded to say that any unnecessary pedestrian guardrail should be removed. In response, the proposals will be designed to avoid the need for pedestrian guardrail, unless absolutely necessary for road safety reasons.

4.1.2 Emergency Services and Metro (WYPTE): The Emergency Services and Metro were consulted email dated 10th December 2014. The Police have responded with a 'no objection' comment, no other comments have been received.

4.1.3 Internal consultation has taken place with colleagues in the Highways and Transportation Services as part of the planning process. Comments have been taken into account.

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An EDCI Impact Assessment has been carried out on the Section 278 Process and is attached as Appendix 1. The assessment confirmed that individual designs put forward as part of this process, will take into account the needs of each of the equality characteristics and will aim to meet Section 278 (4) which states that "A highway authority shall not enter into an agreement under this section unless they are satisfied that it will be of benefit to the public". As part of the design and construction process further equality screenings and impact assessments will be undertaken as required.

4.2.2 The proposals will improve accessibility to the site for pedestrians and cyclists, the works will be designed to accommodate the needs of all users.

4.3 Council policies and City Priorities

4.3.1 The proposed highway works which allow the development to take place accord with the Councils Local Transport Plan and other policies in that they provide a safe means of access for all users of the highway, to and around, the development.

4.4 Resources and value for money

4.4.1 Merrion Way lay-by: The developer will meet the Council's costs, estimated to be £6,000 for traffic regulation order costs and £10,000 fees to check the design and inspect the works, which will be fully funded through the Section 278 agreement.

4.4.2 Woodhouse Lane / Clay Pit Lane: A financial contribution has been agreed towards the council's improvement scheme at the junction of Clay Pit Lane and Woodhouse Lane of £102,418. The S278 Agreement will control the payment of this sum.

4.4.3 The total estimated costs to be injected into the Highways Capital Budget is £6,000 traffic regulation costs and £10,000 design checking fees for the Merrion Way lay-by, the developer procuring the works themselves.

4.5 Capital Funding and Cash Flow.

Funding Approval :	Capital Section Reference Number :-						
Previous total Authority to Spend on this scheme	TOTAL	TO MARCH	FORECAST				
	£000's	2014	2014/15	2015/16	2016/17	2017/18	2018 on
		£000's	£000's	£000's	£000's	£000's	£000's
LAND (1)	0.0						
CONSTRUCTION (3)	0.0						
FURN & EQPT (5)	0.0						
DESIGN FEES (6)	0.0						
OTHER COSTS (7)	0.0						
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Authority to Spend required for this Approval	TOTAL	TO MARCH	FORECAST				
	£000's	2014	2014/15	2015/16	2016/17	2017/18	2018 on
		£000's	£000's	£000's	£000's	£000's	£000's
LAND (1)	0.0						
CONSTRUCTION (3)	0.0						
FURN & EQPT (5)	0.0						
DESIGN FEES (6)	10.0			10.0			
OTHER COSTS (7)	6.0			6.0			
TOTALS	16.0	0.0	0.0	16.0	0.0	0.0	0.0
Total overall Funding (As per latest Capital Programme)	TOTAL	TO MARCH	FORECAST				
	£000's	2014	2014/15	2015/16	2016/17	2017/18	2018 on
		£000's	£000's	£000's	£000's	£000's	£000's
LCC Supported Borrowing	0.0						
Revenue Contribution	0.0						
Capital Receipt	0.0						
Insurance Receipt	0.0						
Lottery	0.0						
Gifts / Bequests / Trusts	0.0						
European Grant	0.0						
Health Authority	0.0						
School Fundraising	0.0						
Private Sector	0.0						
Section 106 / 278	16.0			16.0			
Government Grant - LTP/TSG	0.0						
SCE (C)	0.0						
SCE (R)	0.0						
Departmental USB	0.0						
Corporate USB	0.0						
Any Other Income (Specify)	0.0						
Total Funding	16.0	0.0	0.0	16.0	0.0	0.0	0.0
Balance / Shortfall =	0.0	0.0	0.0	0.0	0.0	0.0	0.0

4.5.4 **Revenue Effects:** There are no revenue effects as a result of this capital scheme.

4.6 Legal Implications, Access to Information and Call In

4.6.1 The works are exempt from call in being a consequence of and in pursuance of a regulatory decision.

4.7 Risk Management

4.7.1 The total cost of the Merrion Way works and staff fees are fully developer funded.

4.7.2 The Woodhouse Lane / Clay Pit Lane junction funding is a fixed contribution towards the larger scheme that is dependent on the Council securing funding from other sources.

5 Conclusions

- 5.1 Planning permission 14/01825/FU was granted on 25th November 2014 for an extension to and refurbishment of Merrion House, Leeds
- 5.2 Highway improvement works will provide a lay-by on Merrion Way shown on drawing (0-)A101 Rev P General Arrangement Upper Ground Floor Plan with a traffic regulation order to make it available for drop off and pick up and disabled parking and the removal of disabled parking on the northern side of Merrion Way.
- 5.3 A contribution will be made towards widening of the footway on Clay Pit Lane to be used in conjunction with a wider Council project shown on drawing 1307/GA/01 Rev A Footway Improvements.
- 5.4 To meet the requirements of the planning permission the applicant has requested that Leeds City Council, as Highway Authority, enters into a Section 278 Agreement to enable the highway works to be carried out.

6 Recommendations

- 6.1 The Chief Officer (Highways and Transportation) is requested to:
- i) note the principles of the highway works to provide a lay-by on Merrion Way for drop off / pick up and disabled parking;
 - ii) to approve an injection of £16,000 into the City Development Department Capital programme for the Merrion Way works;
 - iii) give authority to incur expenditure of £6,000 TRO costs and £10,000 staff checking and inspection costs, all to be fully rechargeable to the developer through the Section 278 agreement;
 - iv) request the City Solicitor to advertise a draft traffic regulation order to make part of the lay-by on Merrion Way limited waiting and part disabled parking and, if no valid objections are received to make, seal and implement the order as advertised;
 - v) approve the inclusion of an obligation in the S278 Agreement for the developer to pay to the Council the sum of £102,418 towards the Clay Pit Lane and Woodhouse Lane junction improvement; and
 - vi) give authority to negotiate the terms of and enter into an agreement with the developer under the provisions of Section 278 of the Highways Act 1980;

7 Background documents¹

- 7.1 None

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

Appendix 1 Equality, Diversity, Cohesion and Integration Impact Assessment



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

Directorate: City Development	Service area: Highways & Transportation
Lead person: Gillian MacLeod	Contact number: 0113 39 51341
Date of the equality, diversity, cohesion and integration impact assessment: 18 th September 2012	

1. Title: Equality Implications of Section 278 Process
Is this a:
<input type="checkbox"/> Strategy <input checked="" type="checkbox"/> Policy <input type="checkbox"/> Service <input type="checkbox"/> Function <input checked="" type="checkbox"/> Other
Is this:
<input type="checkbox"/> New/ proposed <input checked="" type="checkbox"/> Already exists and is being reviewed <input type="checkbox"/> Is changing
(Please tick one of the above)

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Gillian MacLeod	LCC	Service Manager
Adrian Hodgson	LCC	Service Officer
Andrew Thickett	LCC	Service Officer
Mary Levitt-Hughes	LCC	Equality Officer
Lisa Powell	LCC	Performance Manager

3. Summary of strategy, policy, service or function that was assessed:

Section 278 (S278) of the Highways Act 1980 makes provision for the Highway Authority to enter into an agreement to execute works with any other person (either an individual / organisation / developer) to make modifications, improvements and changes to the highway and for those works to be funded by that person / developer or organisation.

Generally, a S278 is applied when, for example, a developer builds a housing estate and there are changes required to the highway to enable access to the site, footways, roads etc...

This Equality Impact Assessment considers the process of determining the requirements of such developments and how this process gives due regard to the equality characteristics.

4. Scope of the equality, diversity, cohesion and integration impact assessment
 (complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan
 (please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input checked="" type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>

Please provide detail:
 This EIA assesses the process, objectives and outcomes of a Section 278 agreement.

4b. Service, function, event
 please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input type="checkbox"/>
	<input type="checkbox"/>

Procuring of a service (by contract or grant) (please see equality assurance in procurement)	
Please provide detail:	

<p>5. Fact finding – what do we already know</p> <p>Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.</p> <p>(priority should be given to equality, diversity, cohesion and integration related information)</p> <p>A S278 agreement is entered into between developers and the Council and ensures that any impact on the highway, or improvements required to the highway, as a result of developments undertaken are agreed, and paid for prior to the works commencing.</p> <p>S278 agreements can be entered into with an individual, but generally they are made between Developers and the Council.</p> <p>There are three types of S278 agreements:</p> <p><u>Mini Section 278 Agreements</u></p> <p>A Mini Section 278 Agreement is a formal arrangement to enable developers to carry out extremely minor highway works. This type of agreement covers minor footway crossing works, amendments to paving to provide level access, removal and reinstatement of planters, etc where the Developer designs and constructs the works, but provides a bond as surety. Leeds City Council obtains staff fees for checking the design and supervision of the works and fixed legal costs. This type of agreement is very minor in nature and does not include for commuted sums (payments for maintenance).</p> <p><u>Minor Section 278 Agreements</u></p> <p>A Minor Section 278 Agreement is a formal arrangement for developers to carry out minor highway works themselves. It follows the same format as a mini S278 agreement but is used for schemes which are slightly more involved than a footway crossing, but not so involved that there is any major requirement for traffic management on a busy road, or likely involvement with statutory undertakers, and the design is not complex in any way. This type of agreement is most often used where the development and highway works are adjacent or make use of the same site, making it very difficult for a separate contractor to be working in the same area, eg re-paving footways, provision of lay-by within a site contractor's working zone. A Minor S278 still requires the provision of a bond but does also allow for the acquisition of commuted sums for maintenance.</p> <p><u>Standard Section 278 Agreements</u></p> <p>A Standard Section 278 Agreement is used for all other highway works. The works are designed and supervised by Leeds City Council on behalf of the Developer. This type of</p>

agreement is used for most significant off-site highway works associated with planning applications. Standard S278 agreements do not require the provision of a bond as all monies are paid upfront.

Process Review

When considering the requirements of a planning application that will require a S278 agreement to deliver highway works once consent is granted, a pro-forma is completed which considers the following:

- Accessibility – using guidelines laid down in the Manual for Streets and LCC Street Design Guide (which has been the subject of an EIA) consideration is given to; walkers, cyclists, vulnerable road users and impact on services nearby, for example - schools
- Vehicular access – safety of this, size of the parking bays
- Internal layout / servicing / bins – shared surface issues. Ability to move around safely.
- Parking – safety issues, availability of disabled spaces in line with the Unitary Development Plan.
- Travel Plan – Availability of public transport
- Off site highways works – impacts of the development on the surrounding area e.g. – increased traffic flows, do we need a new set of traffic lights.
- Road safety – current statistics and impact on these, visibility.
- Planning conditions

These items are considered in terms of the protected characteristics.

S278 (4) states that “A highway authority shall not enter into an agreement under this section unless they are satisfied that it will be of benefit to the public”, and any suggested changes are put forward with this in mind.

Are there any gaps in equality and diversity information

Please provide detail:

No, however to reinforce the need to consider equality impacts, an additional equality item will be added to the pro-forma.

Action required:

Amendments to be made to the pro-forma.

6. Wider involvement – have you involved groups of people who are most likely to

be affected or interested	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Please provide detail: The guidelines issued by the Department for Transport and other agencies which we follow have been equality impact assessed, and this involved some element of consultation. We follow these guidelines and as such, wider consultation is not required or relevant however, each S278 proposal is sent to the relevant Ward Member for their input on behalf of residents.</p>	
<p>Action required: None.</p>	

<p>7. Who may be affected by this activity? please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function</p>		
Equality characteristics		
<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Carers	<input checked="" type="checkbox"/> Disability
<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Race	<input checked="" type="checkbox"/> Religion or Belief
<input checked="" type="checkbox"/> Sex (male or female)	<input type="checkbox"/> Sexual orientation	
<input type="checkbox"/> Other		
<p>(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)</p>		
Please specify:		
<p>The layout of the development will affect everyone, but may have a particular impact on; disabled people, carers, people with push chairs, children and older people. When designing the layout, the Officer will take into account the needs of these groups, recommending installation of things such as; dropped kerbs, tactile paving and traffic lights.</p>		
Stakeholders		
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Services users	Employees	Trade Unions
<input type="checkbox"/> Partners	<input checked="" type="checkbox"/> Members	<input type="checkbox"/> Suppliers
<input type="checkbox"/> Other please specify		

Potential barriers.

<input checked="" type="checkbox"/> Built environment	<input checked="" type="checkbox"/> Location of premises and services
<input type="checkbox"/> Information and communication	<input type="checkbox"/> Customer care
<input checked="" type="checkbox"/> Timing	<input type="checkbox"/> Stereotypes and assumptions
<input checked="" type="checkbox"/> Cost	<input type="checkbox"/> Consultation and involvement
<input type="checkbox"/> specific barriers to the strategy, policy, services or function	

Please specify

The location and heritage of a site may affect the type of improvements allowed.

In the current economic climate, the cost of certain improvements will effect what changes are agreed.

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

8a. Positive impact:

The designs put forward will take into account the needs of each of the equality characteristics and will aim to meet Section 278 (4) states that "A highway authority shall not enter into an agreement under this section unless they are satisfied that it will be of benefit to the public".

Action required:

8b. Negative impact:
None. All designs will be improvements.
Action required:
None.

9. Will this activity promote strong and positive relationships between the groups/communities identified?
<input type="checkbox"/> Yes <input type="checkbox"/> No
Please provide detail: Not applicable.
Action required:

10. Does this activity bring groups/communities into increased contact with each other (e.g. in schools, neighbourhood, workplace)?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please provide detail:
Action required:

11. Could this activity be perceived as benefiting one group at the expense of another?
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please provide detail:

Action required:

None.

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
Add 'Additional Equality Considerations to the S278 pro-forma.	December 2012	N/A	Gillian MacLeod

13. Governance, ownership and approval State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment		
Name	Job Title	Date
Gillian MacLeod	Transport Developments Service Manager	December 2013

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)	
<input checked="" type="checkbox"/>	As part of Service Planning performance monitoring
<input type="checkbox"/>	As part of Project monitoring
<input type="checkbox"/>	Update report will be agreed and provided to the appropriate board Please specify which board
<input type="checkbox"/>	Other (please specify)

15. Publishing	
Date sent to Equality Team	24 April 2013
Date published	