

Report of Public Rights of Way Manager

Report to Parks and Countryside Management Team

Date: 17th June 2016

Subject: Extinguishment of Morley Footpath No. 34 Over the Railway Line and the Creation of a Footpath Alongside the Railway Line

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Morley North and Morley South
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Summary of main issues

1. To consider extinguishing part of Morley Footpath No. 34 between Morley Footpath, and thus modify the Definitive Map and Statement of Public Rights of Way under Section 118A of the Highways Act 1980 following an application from Network Rail.
2. To seek authority to create a footpath over land owned by Land Securities (White Rose Shopping Centre) and Leeds City Council (Highways) between Morley Footpath No. 35 and Morley Footpath No. 62, and thus add a Public Footpath to the Definitive Map and Statement of Public Rights of Way.

Recommendations

3. The Natural Environment Manager is requested to authorise the City Solicitor:
 - (a) to make and advertise a Public Path Extinguishment Order in accordance with Section 118A of the Highways Act 1980, in respect of part of Morley Footpath No. 34 as shown on Background Document A.
 - (b) to confirm the Order, subject to there being no objections or in the event of objections which cannot be withdrawn, for the order to be referred to the Secretary of State, Department of the Environment, Food and Rural Affairs for determination.

- (c) to make a Public Path Creation Order in accordance with Section 26 of the Highways Act 1980 to create a public footpath between Morley Footpath No. 35 and Morley Footpath No. 62 to a width of 2 metres as shown on Background Document A.
- (d) to confirm the Orders subject to there being no objections or in the event of objections which cannot be withdrawn, for the Order to be referred to the Secretary of State for the Department of the Environment, Food and Rural Affairs for determination.

1 Purpose of this report

1.1 To determine an application from Network Rail for a Public Path Order under the Highways Act 1980 to extinguish part of Morley Footpath No. 34 between Morley Footpath No. 35 and 36 on the west side of the railway and Morley Footpath No. 34 on the east side of the railway line following an application from Network Rail.

2 Background information

2.1 In July 2010 Network Rail contacted Leeds City Council Public Rights of Way Section asking if they would investigate some changes to the public rights of way network between Morley Railway Station and the White Rose Shopping centre to enable the closure of two level crossings. On one of the crossings has since been diverted onto a new bridge over the railway line.

2.2 A site meeting was held with Network Rail to discuss the path changes and alternative provisions. The Rights of Way Section considered that a diversion of the Morley Footpath No. 34 across an existing bridge and onto a path behind the White Rose Centre could be acceptable if certain provisions were met, as the level crossing had limited visibility.

3 Main issues

3.1 Network Rail made the initial application to divert the footpath under Section 119 of the Highways Act 1980, in the interests of the landowner. The diversion was from the junction with Morley Footpath Nos. 35 and 36 on the north west side of the railway line, across a field and then the railway level crossing to the south eastern side of the railway line to a new line along the existing line of Morley Footpath No. 35 across a field baulk head then a railway footbridge and then along an unrecorded footpath behind the White Rose Shopping Centre to the south eastern side of the railway line. A copy of the Diversion Order Application is shown as Background Paper B.

3.2 In their supporting statement Network Rail state that although the level crossing with the provision of whistle boards are currently safe in terms of the warning times being greater than the crossing times 'the crossing itself shows very little evidence of use. A footbridge, which already carries public rights over the railway, exists approximately 400 yards to the north-east of this crossing. With the addition of a new short section of public footpath on the east side of the railway, this would link into the existing public rights of way network allowing pedestrians to cross the railway via the footbridge.' They state that there are currently approximately 200 trains per day and this will increase with the Northern Hub Enhancement Programme. They believe 'the closure of the crossing will not only be a safety benefit to users of the public footpath, but will also allow the removal of the existing whistle boards, thus a benefit to the local environment through noise reduction.' The supporting statement is shown as Background Document C.

3.2.1 The Office of Rail Regulation wrote a letter dated 28th October 2011 outlining the risks of the level crossings. It was stated that 'one of the predominant factors (in railway safety) is the ability of the crossing users to be able to see a train approaching in the distance to permit them to adequate time to cross safely or make the decision to wait until

the train has passed before crossing. The White Rose Crossing is on the western edge of a cutting through which the railway runs. The line is also on a curve through the cutting. As such the visibility of trains approaching from the Leeds direction is very limited, especially when crossing from the north to the south. Because of the limitations in the ability to see approaching trains from the Leeds direction, crossing users are in part dependent on approaching trains sounding a warning horn on approach to the crossing. Unfortunately despite this being a requirement placed on train drivers this warning may not always be given. They would support the closure of the White Rose Crossing as a priority. From the alternative route described, this would only have a minimal impact in terms of additional distance walked'. In addition to this the reliance on horns can be affected by background noise and the ability of the path user to hear them. The safe use of the crossing would be significantly affected if the path user had impaired hearing, was using headphones, wearing clothing over the ears such as hoods or hats or if there was loud background noise. This letter is shown as Background Document D.

3.3 As well as closure of the crossing the Diversion Order Application included the removal of a cross-field footpath and the addition of a surfaced path along the edge of the railway line to the rear of the White Rose Centre on land outside of the ownership of Network Rail. The farmer who owns the field supports the closure of the footpath over his field. He also stated that 'I wouldn't risk crossing there, it is on a bend there is a train every 10 minutes, they are so quiet now. I have seen on a number of occasions dogs been killed whilst walked with people. It serves no purpose there is a much safer place to cross on the footbridge'. Another landowner did not respond to Network Rail but it is believed that their land is leased to the farmer who supports the footpath closure. The supporting letter from the farmer is shown as Background Document E.

3.4 Land Securities, owners of the White Rose Shopping Centre, own the land over which the new section of public footpath will run. They support the diversion of the footpath 'on the basis that Network Rail are responsible for the cost of upgrading the footpaths to a standard where Leeds City Council are happy to take them over as dedicated public rights of way and following which Leeds City Council take responsibility for the footpaths including maintenance and repair' and any legal costs they incur. Network Rail has agreed to fund the costs associated with the Diversion Order and the cost of improving and providing the new footpath. The Diversion Order would not be confirmed until the new and improved footpath has been provided to a standard approved by Leeds City Council. Public rights of way diverted under the Highways Act 1980 automatically become maintainable by the Highway Authority (Leeds City Council) at public expense. The email from Land Securities is shown as Background Document F.

3.5 Lengthy consultation with user groups, ward and town councillors, local residents, Network Rail and the landowners were held which are detailed in Section 4 below. Although the user groups and local residents understood some of the safety concerns they wanted to keep the cross-field section of footpath because it provided good views of the area. There are concerns over the likelihood of development of the land in the future and if the footpath remained there would be more potential to get improvements to the footpath network.

3.5.1 During the negotiations various other options were considered to the diversion of the footpath. These included the creation of a new footpath on the western side of the

railway from Morley Footpath No. 35 to Morley Footpath No. 37. However, this was not possible within Network Rail land due to space and ground conditions, and the adjoining landowners would not agree to a new footpath on their land. User groups also suggested pedestrian traffic lights and self-locking gates. Network Rail prefer not to use these in rural locations due to maintenance issues. The frequency of trains and close proximity to Morley Station meant that they would often be closed for longer periods which can cause the public to become impatient and climbing over the gates leading to increased safety risks.

3.5.2 Network Rail's main concern was for the safety of path users on the level crossing and if leaving the rest of the cross-field section of footpath in place would reduce the likelihood of objections they would be happy for this to remain. They have requested that the closure of the footpath crossing only under section 118A of the Highways Act 1980, in the interests of the safety of members of the public using it or likely to use it. To enable the public to reach the same point on either side of the railway line they will also fund a Creation Order to record a definitive footpath on the Woodland Walk behind the White Rose Shopping Centre. Network Rail carry out Risk Assessments on level crossings every three years which include a census and only one or two people used this crossing a day. Due to the limited use over the course of the day and the provision of an alternative route it is considered that the public would not be substantially less convenience by the extinguishment of the level crossing.

3.6 Another section of used footpath alongside the railway was also referred to which provides a continuation of the footpath from the White Rose Shopping Centre footpath to Morley Footpath No. 62. This is on Leeds City Council owned land vested with Highways who would agree to the dedication of a footpath here. As Network Rail are funding a Creation Order for the section of footpath behind the White Rose Shopping Centre to the level crossing it has been suggested that the continuation of this footpath be included in the Creation Order.

3.7 Although the application was originally for a Diversion Order under Section 119 of the Highways Act 1980 Network Rail have confirmed that they now have sufficient evidence available to support a closure of the level crossing with an Extinguishment Order under Section 118A of the Highways Act 1980 on the grounds of public safety. A Creation Order would also be made to record the permissive woodland walk footpath behind the White Rose Shopping Centre on the Definitive Map and Statement as an alternative route. An email confirming this is shown as Background Document G.

4 Corporate Considerations

4.1 Consultation and Engagement

4.1.1 Although consultation is only required with other local authorities, consultation was also undertaken with Statutory Undertakers, Prescribed Organisations, Local Footpath Groups, Ward Members and appropriate Council Departments. Consultation was also undertaken with members of the public who had contacted the council about a temporary closure of a crossing further south on the railway line. four letters of objection, one letter of representation and three letters of support were received.

- 4.1.2 The Ramblers Association, as part of their comments on the extinguishment of Morley 37, state that 'the suggested diversion for Morley 34 is really a disguised extinguishment and completely unnecessary for safety. This crossing - now improved - is considered by us to be safe enough for its location.' The Ramblers Association letter is shown as Background Document H.
- 4.1.3 The Morley Walking Club objected to the application for a diversion of Morley Footpath No. 34. They do not agree that the path is little used. 'The approach to the east of the level crossing which is a fenced path and includes a metal gate, is clearly well worn and there is no grass growing on the path. On the western side the path which is enclosed by a fence and a wall for approximately 25m, has long grass adjacent to each fence but the path through the centre is clearly visible, again showing usage.' He states that the cross-field path appears to be little used but believes that this is because the farmer has not restored the line of the footpath following cropping. 'What is clear, however, is that path users, on finding no path on its correct route, have diverted along the field boundary... The edge of the cropped field clearly shows usage. This is an ancient path, joining communities. This diversion is simply part of Network Rail's programme to eradicate all such pedestrian crossings. The request is more on economic grounds than safety. I cannot recall any accidents on this crossing in the past 60+ years so this crossing, which presumably complies with regulations, can therefore, be deemed safe and this is no requirement for a diversion.' The Morley Walking Club letter is shown as Background Document I.
- 4.1.4 The Leeds Local Access Forum state 'that they do not see any justification for Network Rail's application and are therefore unable to support it.' They were asked to indicate why they did not see any justification for the application. They asked why the application was made under Section 119 of the Highways Act 1980, diversion in the interests of the landowner, occupier or the public, rather than Section 119A as Network Rail have safety concerns and the Office of Rail Regulations (ORR) state that of the two crossings between the White Rose and Morley Railway Station this is the one they have more concern about. They asked if a diversion under Section 119A would stand more chance of success. They also asked why Network Rail were not included in the list of owners and occupiers of the land and queried why they had signed the application saying that the path was not obstructed. The Public Rights of Way Section has seen evidence for Network Rail that they own the railway line. It is likely that, as they were applicants it was assumed that they did not need to then include their details in the Owners and Occupiers section of the form. At the time of this letter the railway crossing was not obstructed and was open and available for use. A temporary closure has since been made and is currently in place on the railway crossing which was made in the interests of public safety, clearly indicating that Network Rail do not consider the crossing safe for use. The owner of the cross field section of the footpath has not always reinstated the path as quickly as he should have following ploughing or cropping but has reinstated the path once directed to by the Public Rights of Way Sections Enforcement Officer. Although this is technically an obstruction it is temporary in nature and the footpath can still be used by the public. The Local Access Forum correspondences are shown as Background Document J.

4.1.5 Numerous meetings have been held with local residents, user groups, Network Rail, City and Town Councillors, the police, Public Rights of Way Section staff and Local Access Forum representatives. Representative of Morley Town Council said they consider the crossing was dangerous as did the police. There was limited visibility and not all trains used their horns. During a site visit with user groups, four trains passed the crossing but only two trains sounded their horns. The safe use of the crossing is reliant on horns to warn of approaching trains because of the limited visibility, failure to sound the horns makes use of the crossing by the public unsafe. Furthermore, when the site visit group went to cross from the western side of the crossing a train travelling from the south hid a train approaching from the north which had not sounded its horn. The group had just begun to walk forward, highlighting how easy it is to cross without seeing or hearing an approaching train. The train was on the far side of the track, but it was easy to see how the public could cross in the path of a train leading to a fatal accident. Photographs of the limited visibility on the crossing are shown as Background Paper K.

4.1.6 A PCSO from the White Rose Shopping Centre stated that on a number of occasions he had chased shoplifters from the centre that ran across the level crossing trying to escape and he had himself tripped on the crossing whilst giving chase. This could have implications for crossing safety because, although the crossing is safe if use with due care, attention and vigilance, shoplifters and those giving chase may not pay as much attention to approaching trains as required.

4.1.7 The Public Rights of Way Section believes that the safety of the public would be improved from not having to use a level crossing with limited visibility particularly as train numbers and speeds are expected to increase. It would be in the interests of Network Rail to remove the level crossing in terms of safety, financial and maintenance responsibilities. The alternative route would be approximately 200 meters longer than the existing route. Considering the total length of the footpath is over a kilometre long this increase in distance is not considered to be substantially less convenient for the public, particularly considering the it would result in a cross-field footpath, which can be difficult to use, being replaced with a bulkhead path which would be easier to use. Furthermore, if as claimed people are using the field edge to reach the crossing the increased distance would only be about 40 metres. The closure of the crossing would improve safety for the public, and although Network Rail state that the crossing is meets ORR guidelines, visibility on the crossing is very limited due to the bend in the track, especially when crossing from the western side of the railway line. The safe use of the crossing is reliant on whistle boards and trains sounding horns but not all of the trains are doing this and for users with hearing impairment, using headphones, wearing clothing that covers the ears or at times when there is background noise safety is compromised. The frequency and speed of trains is set to increase in the near future and the electrification of lines will make trains quieter which will further reduce the safety of the crossing. Some of the land around this footpath has been allocated for housing use. The development of the area is likely to see an increase in use of surrounding footpaths and level crossing resulting in and increase risk to public safety.

4.1.8 The antiquity of the path is not something that can be taken into consideration when making or confirming Public Path Orders. It could be argued that the loss of a historic path could affect the enjoyment of the way. However, the path on this side of the railway is a cross field path with no historic features. The alternative route is

also a cross field path but is on a baulk head and is not subject to ploughing and cropping. As a whole it is considered that the alternative route would be as enjoyable, if not more enjoyable due to it being easier to use than the existing path and not having to use a level crossing to cross a busy railway on a blind bend. As the cross field section of footpath is now to remain the public will still be able to use and enjoy this section of footpath.

4.1.9 The Peak & Northern Footpaths Society representative states that 'I walked the relevant section of footpath. I noted that the footpath is covered in a crop across the field from the farm. Notwithstanding the fact that this is a criminal offence and that the highway authority should be taking enforcement action, I would have expected to see a trodden line through the crop if the path was one that local walkers were using with any regularity. Also the section between the fences and wall down to the crossing is overgrown with vegetation, indicating lack of regular use. Given the existence of a surfaced permissive footpath which would replace the cross-field section for Footpath 34 and be made definitive, we would not object to this proposal if an Order was published.' The letter from Peak and Northern Footpaths Society is shown as Background Document L.

4.1.10 An objection was also received from Atkins Telecoms due to the existence of Cable and Wireless UK apparatus in the area. They state that they will object to an Order unless they have 'written assurances as to the safeguarding of Cable and Wireless apparatus and the reimbursement of costs for any works necessary.' They also stated that where the 'apparatus is to remain within the stopped up area' they would 'require an undertaking that the applicant would grant a wayleave agreement' 'on terms and conditions acceptable to Cable and Wireless U.K. and the reimbursement of' the 'costs associated with the negotiations of the said wayleave'. Network Rail state that wayleaves are already in place for Cable and Wireless to access their equipment. The objection from Atkins is shown as Background Document M.

4.1.11 Morley Town Council state that 'members of the Committee support the proposed diversion of Footpath 34.' The letter of support from Morley Town Council is shown as Background Document N.

4.1.12 Councillor Dawson states that 'I support the application from network rail to divert this footpath.' The letter of support from Councillor Dawson is shown as Background Document O.

4.1.13 A local resident states that 'I fully support these proposals as this level crossing is very dangerous when crossing from north to south as the path crosses the railway diagonally making it blind for walkers with modern trains very fast and quiet. Furthermore I believe the alternative proposed is very safe and would be much easier to use making it much better for the walking public. I am a walker myself and use the paths in this area regularly and fully support the proposal.' The letter from the local resident is shown as Background Document P.

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 As the decision is a Significant Operational Decision an EDCI impact assessment is not required. However, a completed EDCI is attached at Background Paper Q.

4.3 Council Policies and City Priorities

4.3.1 Statement of Action DM11 of the Rights of Way Improvement Plan states that we will determine all applications for Public Path Orders within 12 weeks of receipt. This application has taken considerably longer due to the lengthy negotiations with path users and Network Rail.

4.3.2 Statement of Action PI10 states that where necessary we will temporarily close paths to safeguard path users. The level crossing is temporarily closed on safety grounds and the Public Path Extinguishment Order and Public Path Creation Order will create an alternative route and permanently close the unsafe section of footpath.

4.3.3 Statement of Action PI17 states that we will seek to secure funding for maintenance and improvement works for non-definitive paths. Statement of Action DM7 states that we will continue to identify and record all Definitive Map anomalies, missing links and unrecorded paths. Statement of Action ML2 states that we will endeavour to seek new links in the path network. Statement of Action PW3 states that we will seek to work in partnership with other services within the council to achieve 'holistic' benefits for the path network, its users and the environment. Statement of Action PW4 states that where appropriate, we will seek to work with other organisations external to the council to maximise benefits which can be achieved for the path network, its users and the environment. The alternative route is along unrecorded non-definitive footpaths owned by Leeds City Council Highways and Land Securities. Network Rail will carry out some improvement works and fund the Creation Order which will allow their recording on the Definitive Map and Statement benefiting the network and path users.

4.4 Resources and Value for Money

4.4.1 The cost of making and advertising the necessary Public Path Creation and Extinguishment Order and carrying out improvement works is to be met by Network Rail.

4.4.2 If the Order is opposed, referred to the Secretary of State and is taken to Public Inquiry, then the additional costs are incurred, not covered by Network Rail. A Public Inquiry will cost approximately between £3000 and £8000.

4.4.3 Compensation can be claimed for the making of Creation Orders under section 28 of the Highways Act 1980. The external landowner has agreed not to claim costs for the creation of the footpath in return for the improvement works and will also benefit from improved links towards Morley Station and town centre.

4.4.4 There are no additional staffing implications resulting from the making of the Order.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The Natural Environment Manager has authority to take decisions relating to the extinguishment of public rights of way under Section 118A of the Highways Act 1980 as set out in the Constitution under Part 3, Section 2C, Officer Delegation Scheme (Council (non-executive) functions), Director of Environment and Housing (z).

- 4.5.2 Section 118A of the Highways Act 1980 enables a Council as respects to a footpath, bridleway or restricted byway that crosses a railway in their area, if it is expedient in the interests of the safety of members of the public using it or likely to use it that the path or way should be stopped up, to make an Extinguishment Order.
- 4.5.3 The Secretary of State shall not confirm and the Council shall not confirm an unopposed rail crossing Extinguishment Order unless they are satisfied that it is expedient so to do having regard to all the circumstances and in particular to whether it is reasonably practicable to make the crossing safe for use by the public and what arrangements have been made for ensuring that any appropriate barriers and signs are erected and maintained.
- 4.5.4 The Natural Environment Manager has authority to take decisions relating to the creation of public rights of way under Section 26 of the Highways Act 1980 as set out in the Constitution under Part 3, Section 2C, Officer Delegation Scheme (Council (non-executive) functions), Director of Environment & Housing (v).
- 4.5.5 Under Section 26 of the Highways Act, 1980 provides compulsory powers for the creation of footpaths, bridleways and restricted byways where it appears to a local authority that there is a need for footpaths, bridleways or restricted byways in their area and that they are satisfied that having regard to:-
- (a) the extent to which the path or way would add to the convenience or enjoyment of a substantial section of the public, or to the convenience of persons residing in the area, and;
 - (b) the effect which the creation of the path or way would have on the rights of persons having a legal interest in the land, account being taken of the provisions as to compensation, it is expedient that the path or way should be created.
- 4.5.6 Section 28 of the Highways Act 1980 provides for compensation to be paid for loss caused by the making of any Public Path Creation Order where it can be shown that the value of any interest of a person in land is depreciated, or that a person has suffered damage by being disturbed in his enjoyment of land, in consequence of the coming into operation of a Public Path Creation Order.
- 4.5.7 The personal information in Background Papers E, H to J and L to P of this report have been identified as being exempt under Access in Information Procedures Rule Number 10.4 (1 & 2) because it contains personal information about a member of the public. This information is exempt if and for so long as in all the circumstances of the case, the public's interest in maintaining the exemption outweighs the public interest in disclosing this information. The comments relating to the diversion made in the exempt documents are considered in Sections 3 and 4.1 therefore the public's interests in relation to the diversion have not been affected.
- 4.5.8 The recommendations in this report do not relate to a key decision, therefore prior notification in the Forward Plan is not necessary.

4.6 Risk Management

4.6.1 With all Public Path Orders there is a risk of objections. However, lengthy consultations and negotiations have been held with user groups, local residents, landowners, ward and town councillors to minimise the risk of objection.

4.6.2 Compensation can be claimed for Public Path Orders, but the Orders will be made in the interest of and at the request of one of the landowners Network Rail. The non-council owners of the land over which the footpath is to be created will gain improvements to their existing footpath.

5 Conclusions

5.1 Network Rail originally applied for the diversion of the footpath over the railway line and field on the western side under Section 119 of the Highways Act 1980 in the interests of the landowner. There were objections to the diversion based on the loss of the cross field footpath. After lengthy negotiations all parties involved agreed that it would be feasible to extinguish only the level crossing under Section 118A, railway safety grounds and to create a public footpath on the eastern side of the railway line from Morley Footpath No. 37 to Morley Footpath No. 62 as an alternative route. The proposed extinguishment and creation are shown on Background Document A.

6 Recommendations

6.1 The Natural Environment Manager is requested to authorise the City Solicitor:

- (a) to make and advertise a Public Path Extinguishment Order in accordance with Section 118A of the Highways Act 1980, in respect of part of Morley Footpath No. 34 as shown on Background Document A.
- (b) to confirm the Order, subject to there being no objections or in the event of objections which cannot be withdrawn, for the order to be referred to the Secretary of State, Department of the Environment, Food and Rural Affairs for determination.
- (c) to make a Public Path Creation Order in accordance with Section 26 of the Highways Act 1980 to create a public footpath between Morley Footpath No. 35 and Morley Footpath No. 62 to a width of 2 metres as shown on Background Document A.
- (d) to confirm the Orders subject to there being no objections or in the event of objections which cannot be withdrawn, for the Order to be referred to the Secretary of State for the Department of the Environment, Food and Rural Affairs for determination.

7 Background Documents

7.1 Background Document A: Proposed Extinguishment and Creation Order

7.2 Background Document B: Diversion Order Application

7.3 Background Document C: Supporting Statement for Application

- 7.4 Background Document D: Letter from the Officer of Railway Regulation
- 7.5 Background Document E: Letter from the Farmer
- 7.6 Background Document F: Email from Land Securities
- 7.7 Background Document G: Email from Network Rail
- 7.8 Background Document H: Letter from The Ramblers
- 7.9 Background Document I: Letter from Morley Walking Club
- 7.10 Background Document J: Letter from Leeds Local Access Forum
- 7.11 Background Document K: Photographs of the limited visibility
- 7.12 Background Document L: Letter from Peak and Northern Footpaths Society
- 7.13 Background Document M: Letter from Atkins Telecommunications
- 7.14 Background Document N: Letter from Morley Town Council
- 7.15 Background Document O: Letter from Councillor Dawson
- 7.16 Background Document P: Letter from a Local Resident
- 7.17 Background Document Q: Equality Diversity and Cohesion Integration Screening