

**5<sup>th</sup> September 2019****Agenda Item:10****REPORT OF CORPORATE DIRECTOR, PLACE****BUS LANE ENFORCEMENT – NUTHALL BUS GATE****CONSIDERATION OF REVISION OF HOURS OF OPERATION AND  
INTRODUCTION OF PERMITS****Purpose of the Report**

1. The purpose of this report is to seek approval to commence consultation on modifying the existing permanent Traffic Regulation Order relating to a Bus Gate on Nottingham Road in Nuthall to provide an exemption for vehicles registered to residents of the nearby Horsendale estate area and to change the operational times of the restriction from the current 4pm – 6pm Monday to Friday, to instead being in force 'At All Times'.

**Information**

2. There has been ongoing representation from local residents to County Councillor Owen requesting modifications to the existing Bus Gate on Nottingham Road in Nuthall (Nuthall Bus Gate). This restriction consists of a short section of road which provides direct access to the A610 Nuthall roundabout from the junction of Nottingham Road and Roland Avenue at the edge of the Horsendale residential area. The current arrangement is shown in drawing H/JAB/2166/01.
3. The existing restriction prohibits the use of this section of road in a westbound direction between 4pm and 6pm Mondays to Fridays by all vehicles other than buses and pedal cycles. This prevents vehicles using Nottingham Road as an alternative route to the A610 when trying to avoid any congestion along the primary route and also reduces intrusive traffic along Nottingham Road.
4. The current restriction means that vehicles exiting the Horsendale Estate between 4pm and 6pm Mondays to Fridays who are travelling towards the M1 or wishing to use the A6002 are having to travel down Nottingham Road towards the city and join traffic on the A610 at the junction which was installed to mitigate the effects of the bus gate on residents of the Horsendale Estate by enabling them to join the traffic via the slip road between the soft play centre and public house. It is acknowledged that this does have, however, the effect of placing them at the rear of a queue on the A610 at busy times.
5. The current restriction came into force on 14 December 2015, following an amendment to change the times of operation from 4pm – 6.30pm Monday to Friday to 4pm - 6 pm Monday to Friday with the restriction not operational on Bank Holidays and Christmas Day. The

change of time brought the timings in line with existing bus lanes between Nottingham city centre and Nuthall.

6. The westbound entry onto the Nuthall Island from Nottingham Road is not signalised and operates as a Priority junction. All other arms onto the roundabout are controlled permanently 24/7 by traffic signals. At this specific location on the roundabout there are 3 different approaches controlled by signals and this is the limiting factor to the overall performance of the Nuthall Island.
7. In response to representations, Via East Midlands were briefed by the County Council to consider the feasibility of the requests and to provide recommendations on changes that could be made. The feasibility study looked at the practical and legal implications of the changes, benefits of modifications and considered the implementation of a permit scheme on the current restrictions and on a modified restriction to be in operation at all times. The point of the permit scheme being to allow residents to access the roundabout directly rather than travelling South to join the A610 as described above.
8. This report provides details of the outcome of this feasibility study and includes a recommendation to consider consulting upon a potential change to the current restriction for the bus gate so that it is in operation at all times but with an exemption for vehicles registered to residents of the Horsendale estate area in Nuthall.

## History

9. The Nuthall Bus Gate was initially introduced in 2003, by way of a 12-month Experimental Traffic Regulation Order (TRO) with the aim to prevent peak period “rat running” through the residential area and also to provide priority for westbound buses at the A610 Nuthall roundabout during weekday evening peak periods with the aim of improving journey times and enabling some services, which had been diverted due to the congestion, to become viable once more.
10. Following its introduction, bus operators welcomed the bus gate but for many years reported significant delays due to a large number of vehicles contravening the restriction and requesting that enforcement was undertaken to ensure the bus gate operates as intended. The restriction was originally signed with ‘flying motor bike’ signs forming a gate on the through-route of Nottingham Road.
11. In 2010, NCC was designated as an approved local authority for enforcement of bus lanes. On 8 February 2012 the Council approved modifications of the Nuthall bus gate and installation of an enforcement camera. In early 2013, in preparation for camera enforcement, the restriction was made more conspicuous by the introduction of a mini-roundabout at the Nottingham Road / Roland Avenue junction and the alterations of all associated signs, thus creating a decision point for drivers previously using Nottingham Road as a through route.
12. The alterations to existing signage was done to adopt the use of Bus Lane signs in preference to the flying motor bike signs as these are considered to be more readily understood by drivers.
13. The approach to the bus gate is comprehensively signed to provide advance warning to drivers and to advise of the appropriate route to take.

14. On 21 March 2013, the Transport and Highways Committee approved the use of the enforcement camera at the Nuthall bus gate, set the penalty charge for bus lane contraventions and recommended that Full Council approve participation in the joint arrangements for adjudication services (which is a legal requirement for authorities undertaking civil enforcement). Full Council approved this on 25 April 2013 but also resolved that “the existing TRO be referred to the Transport & Highways Committee with a recommendation for residents of the Horsendale Estate to be an exempted class under the Order and to action this accordingly, subject to the necessary external approvals”.
15. Further work was undertaken at considering the use of exemptions and on 9 January 2014, Transport and Highways Committee approved the commencement of bus lane enforcement at Nuthall Bus Gate, without an exemption for residents. Exemptions for residents was previously considered when the bus gate was introduced but this was discounted and an additional signal-controlled junction, as referred to in paragraph 4 above, was specifically provided as part of the overall package of measures, to address residents’ concerns.

## **Legal & Statutory Framework**

16. The current restrictions are signed as a bus gate (for the period of operation) and no permits are provided. There are a number of exemptions that are standard for this type of restriction.
17. Clarification has previously been sought from the Traffic Penalty Tribunal (TPT) who declined to comment or provide an opinion on the proposed exemption. The role of the TPT is to determine individual PCNs on a case by case basis and do not offer advice on the legality of the TRO. However, if the TPT finds that one or more PCNs that have been issued have no basis in law then the consequences could seriously undermine the entire scheme.
18. Regardless of the sign and wording used, the visual effect of a large number of private vehicles legitimately using the bus gate during its times of operation could mask authorised use and be likely to prompt unauthorised vehicles to use it too. However, it is considered that this risk is reduced if the existing restriction is extended to all times as it will reduce the overall amount of local non-residential traffic from using Nottingham Road as an alternative to the A610.
19. Bus lane offences are not decriminalised in the same way as parking offences and may also be enforced by the police as a criminal offence as well as through the Council’s civil procedure. The Police have previously advised in 2013 that they would be unable to support an exemption for Horsendale residents as they consider that it would make the bus gate unworkable and unenforceable. This view was based on the current restriction in the evening peak time and further clarification from them on whether their view is different for the ‘at all times’ proposal would be sought before proceeding with statutory consultation.
20. The law on traffic regulation is tightly prescribed and any exemption enabling vehicles other than buses to use a bus lane requires the vehicles to be “...defined or described by reference to any characteristics of the vehicles or traffic or to any other circumstances whatsoever”. Legal advice has indicated that this definition means that those classes are not limited to the characteristics of the vehicle but can be extended to include activities for which the vehicle may be being used e.g. loading / unloading. However, it is not settled that this widening of the definition of the class extends further than just to activities, and there is therefore a risk that the TPT could decide that it may not be able to be extended to the address at which a vehicle is registered (having the consequences referred to in paragraph 17 above).

21. Furthermore, the DfT's Statutory Guidance (Provisional Guidance on Bus Lane (including Tramway) Enforcement in England outside London) states, in paragraph 2.7, that "Regulations banning some or all motorised road users from bus lane [sic] should be clear, well-signed and easy to understand. Without these measures the resentment felt by some motorised members of the public towards bus lanes may increase and the policy fail to win public support."
22. Allowing a very large number of vehicles through the bus gate could be considered contrary to this as the specific exemption for residents may not have wider public support. Not only would these factors defeat the purpose of the restriction, but they are likely to lead to a large number of appeals against any Penalty Charge Notices (PCNs) issued.
23. Additionally, to exempt vehicles registered to "residents of the Horsendale Estate" it is necessary to precisely define the geographical area of the "Horsendale Estate". This term refers to a historic area which it is somewhat difficult to define and whilst it would be possible to define it by specifically listing streets and house numbers, it is in a built-up urban area and so there are significant risks of one person being within the 'exempted zone' but not their neighbour. It is estimated that any exemption would be for a maximum of approximately 1,500 vehicles if the option was taken up across the estate. The suggested approach would be to append a plan to the Order. This approach has been used by the County Council on other types of restrictions elsewhere, such as the height restriction to an area of land classed as public highway in Huthwaite.
24. Any change to the current TRO would require consultation with the Police and it is recommended that further dialogue is undertaken with the Police as part of formal consultation.

## **Preferred Scheme**

25. The current regulations have been in place since 2015 and camera enforcement since 2014. The general trend is that contraventions at the Nuthall bus gate are reducing, and this is appearing to reach a plateau of contraventions. This is expected given that it is likely that there would remain a minimum amount of contraventions from commuters who are unfamiliar with the route and camera enforcement. Whilst there is a baseline level of contraventions, the County Council has generally been successful in defending any TPT appeals so far.
26. On the basis of risk of challenge, it is considered higher if a permit scheme was introduced on the current evening peak restriction as there is a risk that other vehicles (without a permit) will see the 'exempted' vehicles going through the bus gate and not understand why they cannot also use the bus gate. Data shows that Nottingham Road is used as an alternative to the A610 throughout the day with this reducing when the bus gate is operational. With a 'peak-time only' restriction it is considered likely that a large number of 'exempted' vehicles using the 'bus gate' at peak times would encourage non-exempted vehicles to follow as well as increasing congestion at the junction. Also, upon prosecution, the offending vehicles are likely to appeal on the basis that they should also be let through and that signage is unclear. As an example, a regular appeal from Blue Badge holders is that 'permit' includes the blue badge which is not the case.
27. The feasibility study concluded that providing exemption for residents based on the current timings was impractical and likely to cause confusion to road users, increased

contraventions and create challenges through the appeals process. An exemption during peak-time only operation was not previously supported by the Police and this conclusion is consistent with advice previously provided to Members on this subject.

28. The feasibility study concluded that if a 24-hour restriction was introduced this risk is reduced as no traffic should be using Nottingham Road unless a legitimate resident or visitor to the Horsendale Estate. Also, the prescribed signing and lining options contained within the Traffic Signs Regulation and General Directions 2018 (TSRGD) enables a 24/7 bus lane to have road markings to accompany the signage and there are options around installing red surfacing to highlight the restrictions and length of the bus lane. It is considered that this would ensure the restriction is conspicuous and help with compliance. All other signing (including advanced signing on Nottingham Road and the A610 would need to be changed). Drawing H/JAB/2166/03 shows the signage and lining changes that would be required.
29. Traffic data shows that outside of the current restriction (4pm and 6pm Mondays to Friday) there is an increase in traffic using Nottingham Road and accessing the A610 adjacent to the Horsendale Estate. Currently this is permitted, and not unexpected as vehicles do use this route as an alternative route to the A610. In the hour (3 – 4pm) before the bus gate is in operation data shows around 130 vehicles using Nottingham Road as an alternative to the A610. The 24/7 restriction would prevent this through-traffic legally using this as an alternative route without contravening the bus lane. The existing camera enforcement would remain the measure used to manage the restriction. By keeping non-residential traffic on the A610 it is considered that this considerably reduces the risk of implementing a permit scheme.
30. TSRGD allows the use of “Except authorised vehicles” as a supplementary plate added to the bus gate signing, an example is shown below.



31. This is a lawful sign, but consideration should also be given to whether it is robust and makes it unambiguous to those not exempt.
32. The Council is required to obtain authorisation for any traffic signs used where they are not in a form already prescribed in the Traffic Signs Regulations, this would include for example “and Horsendale Estate Permit Holders” or “Permit Holders”. However, it is considered unlikely that special authorisation would be obtained, and no special authorisation has thus been sought. It is clear that wording such as “Authorised Vehicles” has historically been the only form of wording approved by DfT. This is because the framework on bus lanes/gates

and their signage relates to use by buses and pedal cycles only and permitted variations are currently limited to the exemption of taxis and motor cycles.

33. Through the British Parking Association, a question was asked to obtain experience and issues from other traffic authorities. One example was found, which was to provide access for vehicles to use a bus gate to gain access to an area that had no alternative entry points. This is not the case at the Nuthall Bus Gate as an alternative route is available via the A610, albeit that is a longer route. One issue raised was that the use of authorised vehicles is widely accepted to mean Private hire vehicles which are not proposed to be exempted at this location. Mitigation could therefore include having a policy that cancels a private hiree's first offence and advising them of the restriction for future contraventions.

34. In December 2018, the bus operator Trent Barton was approached to provide an update on the service, specifically in terms of reliability, patronage growth and customer feedback. This feedback was as follows:

- **Reliability Concerns**

Despite the benefits of the bus gate, service reliability caused by congestion has significantly deteriorated in the last three years and was identified as a major cause for patronage decline in 2017 and the first two quarters of 2018. A Market Research exercise in October 2017 identified 'Being on Time' as the most important thing to customers with over 20% rating the service reliability as Poor or Very Poor.

- **Investment**

Following the feedback and in a bid to halt the patronage decline, Trent Barton in July 2018 took the decision to invest £300k per annum to add two additional buses into the cycle and provide an additional ten minutes to the timetable at Peak Times. Trent Barton confirmed that this appears to have helped halt the decline but there hasn't been any significant increase in patronage.

- **Impact of Bus Gate**

A driving time report has been undertaken between Temple Drive and Nottingham Road, considering the two stops either side of the bus gate. In summary, throughout the day, it takes services considerably longer than the schedule allows to get through the plug whilst it is open to all other road traffic, in some instances up to a minute per trip more on average. However, when the bus gate is in operation between 4pm to 6pm, services are passing through within the timings that are expected – particularly when travelling away from Nottingham.

35. The feedback suggests that the bus gate is having the desired effect when in operation and it is considered that extending the hours of operation of the bus gate would be of greatest benefit during the morning peak as the largest variances are displayed during this period.

36. As part of the feasibility study, consideration was given to modifying traffic signals on the A610 Nottingham Road roundabout and to further signalise the Nottingham Road entry onto the A610 Nuthall roundabout. These have been discounted, however, as they would have a detrimental impact on the performance of the entire junction at all times.

37. During the evening peak there is an added issue that congestion from the A610 towards the M1 motorway backs up across the Nottingham Road exit resulting in wider congestion and delay. The actual green time on all legs varies throughout the day as it depends upon traffic flows, and in the evening greatest priority is given to traffic travelling along the A610 towards the M1.

38. There is now a dedicated traffic lane onto the M1(S) from the A610, which it is anticipated will help reduce congestion and traffic queues at the A610 / M1 roundabout junction. This improvement will result in an improvement to the A610 Nuthall roundabout, although benefits will only be realised once the works are completed and journey time checks completed.
39. The observations taken as part of the feasibility study suggest that opening up the traffic restrictions on Nottingham Road to residents of the Horsendale Estate is not likely to have a significant detrimental effect on bus dwell times, based on the likely flows from the Horsendale Estate and current traffic signal layout at Nuthall Island (10-20 per hour suggested).
40. It should be noted that by introducing the 24/7 restriction that this will increase traffic on the A610 that is already busy at times, this is reflected in traffic using Nottingham Road as an alternative route during the day.

## **Permits - Practical Implications**

41. The current system, where residents' vehicles are not excluded, is largely self-enforcing and relatively efficient to enforce.
42. If a permit system is introduced, there is still a risk of challenge from visitors to the area and a key decision is the eligibility for a permit. It is considered that the standard approach would be to exempt vehicles registered with the DVLA to eligible addresses. This is the same system used for resident parking permits. For example, it is anticipated that this would not extend to temporary hire cars used by residents, works vehicles not registered to the residents' home address, services visiting residents, close family member visiting residents etc.
43. In practical terms it is considered that permits should be restricted to vehicles registered at the home address within the area shown on drawing H/JAB/2166/10 and this plan appended to the Order. This approach has been used by the County Council for other type of restrictions elsewhere, such as the height restriction to an area of land classed as public highway in Huthwaite.
44. Currently an exemption list is used by NCC as part of bus lane camera enforcement. This includes a list of vehicle registration mark (VRMs) of buses that are exempt. This has been created for buses as they are readily identified from the images generated by the camera, especially as bus operators typically use the same bus on the same route every day; the VRM is then recorded, manually added to the list, and ignored by the system thereafter. This process works equally efficiently in relation to taxis and private hire vehicles at other locations (where these are also exempt) since they are readily identifiable from the image. The camera software checks against this list before processing an image that is then validated prior to issuing a Penalty Charge Notice (PCN).
45. This exemption list would need to be extended to include VRMs of those vehicles registered with the DVLA at an address on the Horsendale Estate who have applied for permits, subject to a permit system being introduced. For the estimated 1,500 vehicles considered to be eligible, the above methodology would prove challenging to setup and maintain in the long term though it is possible. There is also a potential risk that any exemption list would just grow and grow as residents may not notify the County Council that they no longer own certain cars or have moved out of the area etc.

46. Under a permit system, it would be necessary to have a list of all vehicles owned / used by residents of the 'Horsendale Estate' and this list would need to be monitored and maintained throughout the lifetime of the TRO, perhaps by way of a time limited registration system (such as a 12-month permit) in order to manage a turnover in vehicles. Each application would need to be processed and the details checked creating a potential appeal issue for those who claim to have forgotten to renew.
47. As such, an exemption for residents would have substantial resource implications as the level of traffic flow through the bus gate during its times of operation directly affects the levels of monitoring and also the number of appeals against enforcement. While expenditure can be recouped from enforcement / charging for permits, no detailed costings managing the exemptions has been carried but it is considered that it would be in excess of £5,000 per annum and could be greater when factoring in costs of rising appeals.
48. It is evident that no mechanism could completely avoid issues arising from the sale of vehicles, residents moving, company vehicles, courtesy cars, borrowed vehicles and visitors to residents, and these factors would likely lead to a large number of appeals as well as resource implications in monitoring and maintaining the proposed exemption.
49. There is no permit system used in Nottinghamshire for bus lanes or bus gates specifically for private vehicles and therefore there is no specific policy that covers this.
50. Since 2010 it has been Nottinghamshire County Council policy to charge (£25 in 2018/19) for the issuing of permits within a Resident Permit Scheme (RPS). Residents within the permit area who are over 75 or blue-badge holders are supplied with permits without charge. The amount is to cover the administrative costs and requires the resident to renew on an annual basis, this helps provide some ownership and puts a greater onus on the resident to advise on changes of vehicles, circumstances etc if they want to continue to gain the benefit of a permit. Also, depending upon the type of RPS, residents can also obtain a single visitor permit.
51. It is recommended that if a permit scheme is proposed to introduce an exemption for local residents then a charge should be made for the issuing of permits. This will offer consistency with other permit schemes, cover administrative costs and provide some ownership from the person applying. It should be noted, however, that when implementing an RPS, the County Council often receives objections regarding the cost of permits.
52. When implementing an RPS, questionnaires are sent to residents eligible for a permit. For a scheme to proceed, the results need to exceed the criteria used by the County Council to progress a scheme of 35% response rate with 65% of respondents in support. A period of 21 days is usually given for the return of the questionnaires. It is recommended that a similar approach is adopted, should a scheme proceed, to confirm the appropriate level of local support.



## **Next Steps**

53. In order to implement the changes recommended from the feasibility study to amend the times of operation from 4pm – 6pm Monday to Friday to the proposed At All Times and to implement the proposed permit scheme a statutory consultation and formal advertisement of the Traffic Regulation Order will need to be undertaken. Based on previous history of the site, it is likely that this will raise objections to the advertised Orders. There are procedures in place to consider objections, and, it is expected that a future report will be brought before Communities & Place Committee to seek approvals to implement the revised TRO.
54. The costs for implementing the Order and changes to the lining and signage is estimated to be £10,000. Currently there is no approved scheme in the highway programme for construction. Subject to satisfactory responses and further approval(s), it is recommended that the Scheme could be added to the highway programme for delivery within 2019/20.

## **Other Options Considered**

55. Exemptions for residents were considered when the bus gate and camera enforcement was introduced in 2014 but this was discounted and an additional signal-controlled junction was provided instead as part of the overall package of measures to address residents' concerns. The proposals within this report are considered to offer a reasonable balance to those locally affected whilst also providing improvements for bus services.

## **Comments from Local Members**

56. No formal consultation has taken place, but Councillor Owen has been briefed on the recommendations and supports this being taken forward.

## **Reasons for Recommendations**

57. Effective implementation of bus priority measures is integral to and supports the Council's transport and highways objectives. Any vehicle irrespective of its origin can cause delay to buses causing bus services to be cancelled / diverted away from areas where they are needed due to congestion.
58. It is imperative that arrangements are highly robust and that enforcement is not only done successfully, but is also subject to public support and high visibility, rather than ambiguity, in order to ensure that the bus gate is able to fulfil its objectives.
59. It is intended that bus gates should be cost-neutral in terms of enforcement. A simpler traffic restriction is clearer and less susceptible to accidental contravention than a more complicated system of exemptions.
60. The recommendation is considered to minimise concerns raised previously about enforcement and contraventions providing greater certainty for drivers and enabling a robust lining and signage scheme to be amended to support the changes.

## **Statutory and Policy Implications**

61. This report has been compiled after consideration of implications in respect of crime and disorder, finance, human resources, human rights, the public-sector equality duty, safeguarding of children and vulnerable adults, service users, sustainability and the

environment and ways of working and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

### **Crime and Disorder Implications**

62. Nottinghamshire Police have not yet been consulted on the recommendation for permit exemption of some 1,500 vehicles for a revised 24/7 operation bus gate. Previously they were not supportive of permit exemptions for the evening peak restriction and Nottinghamshire Police will be consulted as part of the formal Order process, if consultation is approved.

### **Financial Implications**

63. The costs for implementing the Order and changes to the lining and signage is estimated to be £10,000. Currently there is no approved scheme in the highway programme for construction. Subject to satisfactory responses and further approval(s), it is recommended that the Scheme could be added to the highway programme for delivery within 2019/20.

### **Human Rights Implications**

64. The implementation of the proposals within this report might be considered to have a minimal impact on human rights (such as the right to respect for private and family life and the right to peaceful enjoyment of property, for example). However, the Authority is entitled to affect these rights where it is in accordance with the law and is both necessary and proportionate to do so, in the interests of public safety, to prevent disorder and crime, to protect health, and to protect the rights and freedoms of others. The proposals within this report are considered to be within the scope of such legitimate aims.

### **Public Sector Equality Duty implications**

65. As part of the process of making decisions and changing policy, the Council has a duty 'to advance equality of opportunity between people who share a protected characteristic and those who do not' by thinking about the need to:

- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality of opportunity between people who share protected characteristics (as defined by equalities legislation) and those who don't;
- Foster good relations between people who share protected characteristics and those who don't.

66. Disability is a protected characteristic and the Council therefore has a duty to make reasonable adjustments to proposals to ensure that disabled people are not treated unfairly.

### **Implications for Sustainability and the Environment**

67. The proposed changes are considered to have a positive benefit for bus services using this route that will help may encourage modal shift to sustainable modes of transport. The changes would also reduce through traffic on the unclassified Nottingham Road that would improve the environment for vulnerable highway users, such as pedestrians and cyclists,

## **RECOMMENDATION/S**

It is recommended that:

- 1) Committee approves the commencement of consultation on a proposal to modify the existing permanent Traffic Regulation Order Bus Gate on Nottingham Road in Nuthall to  
i) allow exemption for vehicles registered to residents of the Horsendale estate via a chargeable permit system and ii) change operational times from 4pm – 6pm Monday to Friday to At All Times

**Adrian Smith**  
**Corporate Director, Place**

**For any enquiries about this report please contact:**

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### **Constitutional Comments (SJE – 15/08/2019)**

68. This decision falls within the Terms of Reference of the Communities & Place Committee to whom responsibility for the exercise of the Authority's functions relating to traffic management has been delegated.

### **Financial Comments (GB 25/7/19)**

69. It is proposed that the costs involved in this scheme (£10,000) are funded from within the 2019/20 Integrated Transport Measures capital budget. This capital budget totals £7.1m and is already incorporated within the approved 2019/20 capital programme.

### **Background Papers**

All relevant documents for the proposed scheme are contained within the scheme file which can be found in the Major Projects and Improvements section at Trent Bridge House, Fox Road, West Bridgford, Nottingham.

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

### **Electoral Division(s) and Member(s) Affected**

Nuthall and Kimberly ED

Councillor Philip Owen