

Order Decisions

Inquiry opened on 15 January 2019 Site visits made on 16 and 17 January 2019

by Susan Doran BA Hons MIPROW

an Inspector appointed by the Secretary of State for Environment, Food and Rural Affairs

Decision date: 02 April 2019

Order Ref: ROW/3197274

- This Order is made under Section 53(2)(b) of the Wildlife and Countryside Act 1981 and is known as The Lancashire County Council Public Footpath on Foreshore to Lindeth Road Silverdale (Definitive Map Modification) Order 2013.
- The Order is dated 4 December 2013 and proposes to modify the Definitive Map and Statement for the area by adding a footpath as shown in the Order plan and described in the Order Schedule.
- There were 3 objections outstanding at the commencement of the inquiry.

Summary of Decision: The Order is confirmed

Order Ref: ROW/3197275

- This Order is made under Section 53(2)(b) of the Wildlife and Countryside Act 1981 and is known as The Lancashire County Council Browns Houses to Lindeth Road Silverdale (Definitive Map Modification) Order 2013.
- The Order is dated 4 December 2013 and proposes to modify the Definitive Map and Statement for the area by adding a footpath as shown in the Order plan and described in the Order Schedule.
- There were 8 objections outstanding at the commencement of the inquiry.

Summary of Decision: The Order is confirmed

Preliminary Matters

- Order A concerns the addition of a Footpath along the shore at Brown's Houses¹, Silverdale between its junction with Footpath 14, point E on the Order plan, B, the remains of a concrete ramp, and A, its junction with Lindeth Road. It is also referred to as 'the Foreshore' or 'Foreshore to Lindeth Road route', and 'the blue and yellow route'.
- Order B concerns the addition of a Footpath in front of Brown's Houses (north of the sea wall) between Lindeth Road, point C on the Order plan, and D, its junction with Footpath 14. It is also referred to as 'the Brown's Houses' or 'Brown's Houses to Lindeth Road route', and 'the brown route'.
- 3. Lindeth Road² passes Jenny Brown's Point which lies west of the Order routes. There is a cattle grid on Lindeth Road, adjacent to the site of a former quarry, beside which a slope leads down onto the foreshore.
- 4. During the Inquiry I made 2 site visits accompanied by representatives of Lancashire County Council ('the Council'), the Objectors and interested parties.

referred to as 'Order A'

referred to as 'Order B'

¹ Sometimes referred to as Jenny Brown's Houses

² Also referred to as Gibralter Lane or Road and Sand Lane

On the first, I walked both Order routes and Lindeth Road between Brown's Houses and the cattle grid, and on the second I viewed the route of Order A at high tide.

Validity of the Orders

5. I am satisfied that there are 2 duly made orders before me for determination, both made in 2013. How they are referenced either by the Council or by the Planning Inspectorate is an internal matter for those bodies; and the naming or numbering of a route is a matter for the Surveying Authority.

Limitations and Conditions

6. I have considered the Limitations and Conditions described in Part II of the Schedule to Order A - that the route is periodically under water in whole or in part at high tide. This is a technical point affecting the public's use of the path, and a fact under certain conditions. I am satisfied no modification is needed in this regard if I decide to confirm the Order.

The Main Issues

- 7. The Orders have been made under Section 53(3)(c)(i) of the Wildlife and Countryside Act 1981 ('the 1981 Act'), which requires me to consider whether, on a balance of probabilities, the evidence shows that public footpaths subsist over the Order routes. The evidence adduced is both documentary and user.
- 8. Section 32 of the Highways Act 1980 ('the 1980 Act') requires me to take into consideration any map, plan or history of the locality, or other relevant document provided, giving it appropriate weight, before determining whether a way has been dedicated as a highway, in this case as a public footpath.
- 9. Dedication through public use arises either by presumed dedication as set out in Section 31 of the 1980 Act, or by implied dedication under common law. The 1980 Act requires me to establish the date when the public's right to use the Order route was brought into question, then determine whether use by the public has been as of right (without force, secrecy or permission) and without interruption for a period of not less than 20 years ending on that date. Finally, I need to consider whether there is sufficient evidence to show the landowners did not intend to dedicate public footpath rights during that period.
- 10. At common law, a right of way may be created through expressed or implied dedication and acceptance. The claimant needs to show that the landowner (who must have the capacity to dedicate) intended to dedicate a public right of way; that public use has gone on for so long that it could be inferred; or they were aware of and acquiesced in public use. Use by the public must be as of right, however, there is no fixed period and, depending on the facts, may range from a few years to several decades.

Reasons: Order A

Documentary evidence

11. The 1846 Tithe Map for the Township of Warton with Lindeth and early Ordnance Survey ('OS') maps show access has been available to the foreshore for many years. However, the earliest evidence of a means of access at A is a 1946 aerial photograph showing a well-defined route to the west of Brown's Houses. This is the fore runner of the concrete ramp, one constructed of sand and stone described in the witness evidence (paragraph 17). Later photographs (1952/3, 1963 and 1972) show it as a wide track, met by a narrower trod from the direction of Jenny Brown's Point (1963 and 1972).

- 12. The man-made ramp is shown on a 1970 OS map, where it connects with a network of other tracks on the foreshore and marshes, some of which are seen on the photograph taken from the air in 1972. There is no barrier visible at the junction with Lindeth Road (A) preventing access to the ramp, and cars are seen on it and the foreshore which could be public or connected with turf cutting activities on the marshes. Two images from the 1980s show parts of the foreshore route, ramp, and trod. One, dated 1987, shows a barrier in the open position at the top of the ramp (A) as described by witnesses (paragraph 17). It replaced an earlier chain that prevented vehicular use when closed. A sign at A stating 'Private Property Access only for Authorised Vehicles' is seen on a 1994 photograph, with a hand painted sign reading 'Path' on the end of the wall, arrows pointing to the ramp.
- 13. Walking Guides published in the 1980s and 1990s describe both the Order route and one continuing along the foreshore to and from the direction of Jenny Brown's Point (the trod). These suggest both routes were available for use, even if not legally recorded.

Witness evidence

- 14. In August 1994, the owners of the foreshore deposited a map and statement³ of the public rights of way they accepted over their land. As the Order route was not included, this brought into question the public's right to use it, providing a 20-year period of August 1974 to August 1994.
- 15. Evidence of use and the recollections of local people was gathered in the 1990s in user evidence forms, letters, statements and statutory declarations. Given the passage of time I heard oral evidence of use from only one witness, and observations of its use from another. The oral evidence which has withstood cross examination attracts the most weight. More weight is attached to the evidence that can be corroborated, and to the sworn and signed statements, than to the remaining items. The level of detail provided in some cases is lacking, and some generalised statements are of limited value.
- 16. One witness began to use the route of Order B in 1962, 3 or more times a month approaching from the east. On her return journey, she would sometimes follow the route of Order A down the ramp (A-B) and along the foreshore (B-E). She never continued along the foreshore to or from the direction of Jenny Brown's Point. Another witness who had lived at No.2 Brown's Houses since 1980 had observed many people using the Order route.
- 17. There is written evidence of the reputation of the Order route being used by the public both before the 20-year period, during it, as well as after 1994. Knowledge or use is described for every decade from the 1940s to the 1980s. Whilst some suggest it was 'always' the route used, a witness records that the ramp (A-B) was constructed in around 1947, a little later than evidenced by the aerial photograph (paragraph 11). He was part of the team which removed a length of the sea wall to build access for vehicles to the marsh for turf cutting. It was claimed that the chain across the top was 'always' locked or locked only

³ Under Section 31(6) of the Highways Act 1980

at night. In the 1970s the ramp was widened and surfaced with concrete and the chain replaced with a bar which again was locked. The barrier subsequently fell into disuse and was removed. Witnesses reported that pedestrian access was available to one side both before and after the ramp was improved.

- 18. Given the existence of the ramp it is likely that regular public use of the Order route commenced prior to the 20-year period under consideration. There are accounts of such use in witness statements from some long-standing residents of Silverdale, or people previously associated with the area. Several had knowledge of the route following the foreshore and had seen others use it. Several described their personal use of it for many years including the 20-year period, one or two indicating regular, daily or monthly use, others less frequent use; some gave no indication of how often they used it. Some people parked at the former quarry and accessed the foreshore there, or followed the foreshore accessing Lindeth Road at various points rather than via the Order route or the slope at the quarry. Nevertheless, the weight of evidence is that people followed the Order route to and from A.
- 19. The owners of the foreshore had owned it since 1969 and, through their actions in 1994, considered no public right of way existed over that land, although they accepted a footpath leading to Brown's Houses following the route of Order B. The ramp A-B facilitated the movement of vehicles and sheep to and from the marshes, and at times prior to and during the 20-year period there was a locked barrier, but there is nothing to indicate this was intended to, or in practice, prevented access on foot. From the 1990s, use of the foreshore route was encouraged by signs put up by the residents of Brown's Houses.

Conclusions on the evidence: Order A

- 20. The OS maps provide good evidence of the physical features at the survey date, but not the status of the Order route. Nevertheless, together with the photographic evidence they confirm a route was available on the ground, during the 20-year period and earlier, that the public could have used on foot.
- 21. Use by the public on foot began after the construction of the ramp at A-B in around 1946. Although closed off at times to vehicles, there was space on one side of the barrier which the public used to pass around it. As well as personal accounts of use of the Order throughout the 20-year period there are references to its reputation as a public footpath. There is nothing to indicate that use was by force, by stealth or by permission, nor evidence that it was interrupted. During the 20-year period, the landowners took no, or insufficient steps, to indicate to the public they did not intend to dedicate a public right of way over the Order route. On balance I conclude the evidence tips in favour of the tests having been met, such that a right of way subsists.

Reasons: Order B

Documentary evidence

Sources pre-dating the Definitive Map and Statement

22. Yates' Map of 1786 provides the earliest depiction of a route at this location, a 'cross road' forming part of a wider network of ways linking Silverdale with Warton, suggesting a status higher than footpath. The 1846 Tithe Map shows it passing in front of Brown's Houses (between the cottages and a building) before opening out to the foreshore and heading eastwards. Its description as 'Roads, Rivers and Waste' in the Apportionment does not necessarily indicate it was a public road, but this and its depiction are consistent with Yates' map.

- 23. Yet it was not excluded from land parcels and no deduction for a public right of way recorded in the 1910 Finance Act records. This does not mean that none existed: there was no penalty for failing to claim a right of way, whereas there was for a false claim. No private easement is recorded. The evidence is neutral.
- 24. A feature likely to be a sea wall is shown on an 1848 OS map, closer to Brown's Houses than the present wall. A track passes between them towards Dyke House, defined by a pecked line on the south side beyond which it is open to the foreshore. By 1891 the current sea wall is shown, including the length later removed to accommodate the ramp accessing the foreshore (paragraph 17, Order A). In front of No.2 Brown's Houses the route divides (shown by pecked lines), one branch continuing to Dyke House, the other towards the foreshore where it heads eastwards. These features appear similarly on a 1913 OS map. Collectively, these maps depict a route corresponding or consistent with the Order route on the north side of the sea wall passing between it and Brown's Houses providing good evidence of its physical existence, though not its status.
- 25. West towards the quarry Lindeth Road was largely unbounded on its southern side (shown by a pecked or broken line on OS maps), so access may have been possible to the foreshore at various points, although the documentary and user evidence provide little support for this as an alternative to the Order route.
- 26. Council Highway records show Lindeth Road was adopted highway⁴ in 1929, when maintenance responsibility passed from the District to the Council. The route straddles two map sheets extending to a point west of Brown's Houses. Photographic evidence from the 1930s shows gates here (paragraph 28). Its length, 1350 yards and 7 yards, seemingly refers to the maps over which it extends. The key shows coloured routes (of which this is one) are roads 'at present repairable by the Lancaster Rural District Council'. These were the routes taken over by the Council, the records ultimately forming part of their List of Streets. The acceptance of such maintenance responsibilities would not have been undertaken lightly, although such documents were produced for internal use rather than for public scrutiny. I find the combined map measurements show the publicly maintainable highway slightly overlaps the Order route at C rather than falling short of it⁵. This overlap is insignificant and would not affect any existing private rights. I do not consider any perceived 'shortfall' of maintenance on the ground an issue, having regard to the recorded extent of maintenance liability.
- 27. A map produced under the Rights of Way Act 1932 marks a public footpath from the old quarry along Lindeth Road to Brown's Houses where it follows the Order route before reaching the foreshore and continuing eastwards. This contrasts with the District Council view that Lindeth Road was an unclassified County road in 1929. Nevertheless, those responsible for drawing up this map believed the public footpath followed the Order route at Brown's Houses. Most routes it shows are now recorded public rights of way.
- 28. The 1930s photograph shows the west end of Brown's Houses, the road or track running between stone walls and the wall in the foreground partly in poor

⁴ Adopted Unclassified County Road

⁵ By up to 10 metres as suggested by the Objectors

repair. There is no access to the foreshore at this point. To the right is a wooden 'field' gate in the closed position with a 'Private' sign clearly visible, and to the left a 'gap' and narrower gate in the open position. It is impossible to tell if there was a similar (or any) notice on this gate. The owners may have regarded the land at Brown's Houses as private with no public right beyond, or they did not intend to dedicate one. However, most public rights of way cross private land, and such a notice would not affect any existing public rights. I regard the notice as indicating there was no passage beyond for public vehicles, Brown's Houses lying at the end of a road regarded as publicly maintainable highway in 1929 (paragraph 26), and a public footpath which continued eastwards in 1932 (paragraph 27). By 1946 (aerial photograph) the foreshore route (Order A) was available west of Brown's Houses (via the ramp), but no onward route west along the foreshore.

The production of the Definitive Map and Statement

- 29. The first stage in the process was the Parish Survey, comprising a map and description. The Map⁶ shows a route from the old quarry through Brown's Houses and onto the foreshore corresponding to the 1932 route. A bridle gate is marked⁷, consistent with the position of the 1930s gate which may or may not be the same structure. Guidance for completing the Survey described a bridle gate as usually being 5 feet wide. The perspective makes its width difficult to estimate, although it appears more like a pedestrian gate. The path's description contains some inaccuracies: Brown's Houses were not fishermen's cottages, neither was the chimney on the foreshore (to the east) associated with a 'lime kiln'. Amendments were subsequently made including removing the section between Brown's Houses and the quarry which was already recorded as public highway (paragraph 26), and its length amended accordingly.
- 30. Two of those carrying out the Survey had not lived in the area long. However, Parish Council Minutes demonstrate a sub-committee (of which they were part) had been elected to carry out the task. The results were placed before the Parish Council Meeting for inspection, approval and suggestions, as was the later Draft Definitive Map ('DM') which was also made available in the village. There is nothing to suggest the route claimed was not met with approval, and the amendments demonstrate the matter was approached with due diligence.
- 31. I find the path's description consistent with the Order route rather than one following the foreshore to meet Lindeth Road (Order A), or towards Jenny Brown's Point. Land in front of the cottages is on an incline. However, the route is described turning up the slope past the chimney, and at the cottages passing through a bridle gate. This would not be possible on a foreshore route where there is no evidence of a bridle gate existing. The chain on the ramp at A (paragraph 17, Order A) could not be construed as one. Neither would there be need to record the gate if the path did not run between the sea wall and Brown's Houses. I consider the slope east of the cottages, a natural feature, can be differentiated from the ramp to the west, a man-made one. Given the direction of travel, the slope is approached first, before the cottages and the bridle gate. That would not be true for the ramp which lies west of the bridle gate.

⁶ On an OS base map dated 1919

⁷ Annotated 'B.G.' on the map

- 32. The Draft DM (published in 1955) shows the footpath commencing at the cottages and continuing eastwards. However, it leaves the track in front of No. 1 Brown's Houses, crossing over the sea wall onto the rocky outcrop on the foreshore. The Provisional DM (published in 1960) is slightly different (although it should have been the same as the Draft DM) the path commences in front of No.2 Brown's Houses. No objections were received to the inclusion of the path. The first Definitive Map and Statement ('DMS') was published in 1962. The footpath falls short of the road and seemingly overlaps the sea wall. The DMS was reviewed and a new version published with a relevant date of 1966 showing the path by a dashed line commencing on the foreshore then crossing the sea wall. From Draft to review, the Definitive Statement ('DS') remained unchanged, describing the path terminating at the County road near Brown's Houses.
- 33. A property search dated 1954 indicated Lindeth Road was not publicly maintainable between Brown's Houses and the cattle grid whereas later searches (in 1978 and 1989) stated it was. The optional question about public rights of way was not answered in any of these searches. The 1954 search is consistent with the 1932 and Parish Survey maps (paragraphs 27 and 29).

Sources post-dating the Definitive Map and Statement

- 34. By 1970 the gate(s) at Brown's Houses had moved slightly west. The OS map shows the track between the cottages and sea wall defined by a pecked line on its northern side, and a network of tracks on the foreshore, including the route of Order A. These features are illustrated in a 1972 photograph showing a garden area at Brown's Houses marked by a row of stones, which were recalled by a witness. There is no clear wear line beyond D, but this is at the edge of the photograph, so may be out of view. A trod is seen heading towards Jenny Brown's Point. These features are captured on two images from the 1980s. By 1987 there is an area of hardstanding in front of No.1 Brown's Houses; and by 1994 wooden gates have been installed at D, preventing sheep accessing the land in front of the cottages.
- 35. A 1992 OS Pathfinder Map shows the path on the north side of the sea wall. The public rights of way information shown derived from Council records which have been interpreted as following the Order route.

Witness evidence

- 36. Queries arose about the alignment of Footpath 14 in 1993 when a member of the public complained to the Council about a gate and 'Private' notices at Brown's Houses. At the time, the Council determined the footpath should follow the Foreshore route, but subsequently (in 1994) determined it followed the Order route, on the north side of the sea wall. Measurements taken from the DM by a former resident of Brown's Houses placed it on the opposite (seaward) side of the sea wall. Further measurements taken with the owner of Dyke House (in 1996) placed it partly on the north and partly on the south side of the sea wall. The Council maintained the line was intended to follow the Order route to the north of the wall; the objectors that it was on the foreshore.
- 37. The evidence was considered by the Council's Public Rights of Way Sub-Committee in 1996 which resolved the footpath ran on the brown route. However, the matter remained without conclusion until 2009 when a definitive map modification order application was made to add the Order route to the

DMS. The Council determined that no order be made. That decision was appealed and the Order, Order B the subject of this decision, was made.

- 38. The comments above (paragraph 15, Order A) regarding the user evidence gathered in the 1990s apply. I heard oral evidence of use from 2 witnesses. One discovered the path in 1962 and her use continued to the mid-1990s. Heading west, she went up the slope and followed the Order route to Lindeth Road, and sometimes used this route on the return journey. She used it 3 or more times a month, for example on summer evenings, at weekends or holidays in the winter. She walked with her husband and often with friends, and regularly saw other walkers. She was never challenged and did not recall any notices until the 1990s when she encountered a gate and sign at the cottages and was challenged by one of the residents. The other witness was aware of a public right of way running between the cottages and sea wall in the late 1970s when they were for sale. She used the path frequently from 1968, at least 4 times a month, until the 1990s when the gate and private sign appeared. She had not been challenged.
- 39. Of the written evidence use is divided. Some, including several local residents only used the route of Order A and did not regard that of Order B as a public right of way. During the war years it was said no-one was allowed through, although some witnesses said they used it then. Conversely, others including local people regarded the route of Order B as the public footpath. Knowledge and use extended back over some 60 years.
- 40. During the 1970s the cottages were let as holiday accommodation and the caretaker was said to have stopped users. A resident at No.2 Brown's Houses was also said to have turned people away from the early 1980s.
- 41. The evidence considered above shows there were gates west of the cottages from at least the 1930s. At some point the larger and smaller gate were replaced with a single gate. In 1980 the gate was in poor repair and was replaced. It carried a 'Private' notice, although witnesses do not refer to these until the 1990s. A gate or gates are evident in some of the photographs and are sometimes seen closed. Some of the written evidence of witnesses also referred to this. However, users may not have recalled them if they were open and presented no obstacle. Written evidence indicates they were closed by the residents of Brown's Houses, though not always, and this coincided with a period when sheep were being moved to and from the marshes and the gates directed them away from the gardens.
- 42. A previous owner of No.1 Brown's Houses wrote in 1996 that he had little doubt the Order route, passing between the cottages and sea wall, was the public right of way and old Silverdale residents had indicated this. However, in a further letter he expressed a wish to be disassociated with the enquiry as he was being 'involved between two parties rather than the right of way of the walking general public' and withdraw his involvement in the matter.

Conclusions on the evidence: Order B

43. Both the County and Tithe maps indicate a through route and are suggestive but not determinative of a public road. The Finance Act records take matters no further. The OS mapping shows the Order route as the only one accessing the foreshore at this location in the 19th Century, but not its status. Not until 1946 was a second route established onto the foreshore, west of the cottages.

- 44. Prior to the DMS, the records drawn up in 1932 and in the early 1950s show the Order route was considered to be a public footpath, although there was some uncertainty about its extent west of Brown's Houses. However, the process was undertaken diligently. The Draft, Provisional and DMs all show anomalies in the depiction of the route at the cottages, although its description remained unaltered. I consider these records provide strong evidence in support of Order B as a public footpath. Later OS maps whilst depicting the route are not in themselves evidence of its status.
- 45. There is unequivocal evidence of a 'Private' sign on the gate at Brown's Houses, at least from the 1930s. However, given the contemporary evidence of its reputation and recording as a public footpath and of Lindeth Road being a publicly maintained highway, I regard this as directed at users with vehicles rather than pedestrians.
- 46. The witness evidence is contradictory some believed the Order route was the public footpath, whilst others considered it to be the foreshore route (Order A). A former owner considered the footpath to pass between the cottages and sea wall. Nevertheless, I do not consider the contradictions to be significant as the documentary evidence supports the longstanding existence of a public right of way over the Order route, which is supported by its reputation and use evidenced at least by some members of the public in later years.

Other matters

- 47. Further to the Countryside and Rights of Way Act 2000, the foreshore became 'open access land', accessible to the public on foot. However, that does not preclude or prevent the recording of a public right of way over that land on evidence pre-dating the commencement of the Act.
- 48. The evidence submitted demonstrated how significantly the landscape on the foreshore at Brown's Houses has altered since the mid-1990s as a result of the tide and storm damage. Accordingly, many of the features evident in the documentary record are no longer visible today. Evidence was presented to show that the foreshore route (Order A) remains accessible other than at very high tides. Nevertheless, the suitability or desirability of a particular route for public use are not matters that I can consider in reaching my decisions.

Overall Conclusion

49. Having regard to these and all other matters raised in the written representations and at the Inquiry, I conclude the Orders should be confirmed.

Formal Decisions

Order A

50. I confirm the Order.

Order B

51. I confirm the Order.

S Doran

Inspector

APPEARANCES

For the Order Making Authority:

Constanze Bell	of Counsel, instructed by Lancashire County Council
who called	
David Goode	Public Rights of Way Manager
Margaret Welbank	
Mildred Stevenson	
For the Objectors:	
Andrew Dunlop	representing Bernard and C Hones
who called	
Bernard Hones	
Sarah Fishwick	Objector
Others who speke against the Orders	

Others who spoke against the Orders

Karen Medhurst

DOCUMENTS

- 1. Submission concerning validity of the Orders, submitted by Mrs Medhurst
- 2. Ordnance Survey Pathfinder Map 636, Grange over Sands, Document 52, Order B, submitted by Lancashire County Council
- 3. Opening submissions on behalf of Lancashire County Council
- 4. National Parks and Access to the Countryside Act 1949, Survey of Rights of Way Memorandum, January 1950, submitted by Mr Dunlop
- 5. Eleven colour photographs showing the shore at Brown's Houses, submitted by Mr Dunlop
- 6. Copy and enlargement of Document 32, Order B, submitted by Lancashire County Council
- 7. Two black and white photographs of Jenny Brown's Point, pre-1980, submitted by Mr Dunlop
- 8. Witness statement of Nancy Allen (24 May 1986) with attachments, submitted by Mr Dunlop
- 9. Slides from presentation of 'Route of Footpath 14 in relation to Brown's Houses', submitted by Mr Dunlop
- 10. Letters dated 21 and 29 March 1996 from Mr J Slater, submitted by Lancashire County Council
- 11. Email dated 19 April 2010 with attachments from, and submitted by, Mrs Fishwick
- 12. Two enlarged extracts of maps, Document 50, Order B, submitted by Lancashire County Council
- 13. Copy of Order with plan and aerial photograph, Document 46, Order B, marked to show extent of publicly maintainable highway, submitted by Lancashire County Council
- 14. Paper headed 'Extent of Maintainable Highway', dated 18 January 2019, submitted by Lancashire County Council
- 15. Google earth map annotated to show extent of publicly maintainable highway, submitted by Mr Dunlop
- 16. Key to 1929 Handover Map, submitted by Lancashire County Council
- 17. Ordnance Survey Products and services FAQs: Accuracy, submitted by Mr Dunlop
- 18. Closing statement and addendum, submitted by Mr Dunlop on behalf of the Objectors
- 19. Closing statement of the Order Making Authority, submitted by Lancashire County Council



