



LOCAL PLAN PARTIAL REVIEW

Publication Consultation - Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/localplanmysay. You can also participate in the consultation online.

Please complete both Part A and Part B. For questions where there are multiple choice answers, please indicate your choice by placing a 'X' in the appropriate box(es).

PART A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed to act on your behalf, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agent's Details' fields.

	Personal Details	Agent's Details (if applicable)
Title		Miss
First Name		Poppy
Last Name		Hilton
Job Title (where relevant)		Senior Planner
Organisation (where relevant)	DJ & SC Smith	Lambert Smith Hampton
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PART B – Your Representation

1. To which part of the consultation does this representation relate? Please note – comments should be restricted to the matters listed <u>only</u>	X	Partial Review (Policy S1 and supporting text)
		Sustainability Appraisal
		Habitats Regulations Assessment

2. Do you consider the Local Plan Partial Review is:				
Legally compliant		Yes		No
Sound		Yes	X	No
Complies with the Duty to co-operate		Yes		No

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments

Please refer to the attached representations.

(Continue on a separate sheet /expand box if necessary)

4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the attached representations.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

No I do not wish to speak at the Examination

Yes I would like to speak at the Examination

X

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to speak at the examination, please outline why you consider this to be necessary

Please refer to the attached representations.

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

7. Do you wish to be notified of subsequent stages of the Local Plan?

Submission

X

Yes

No

Publication of Inspector's Report

X

Yes

No

Adoption of the Local Plan Partial Review	X	Yes		No
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Declaration

I understand that all representations submitted will be considered in line with this consultation, and that my comments will be made publically available and may be identifiable to my name / organisation.

I understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed: Poppy Hilton

Date: 3rd January 2020

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publically available when displaying and reporting the outcome of this statutory consultation stage, and cannot be treated as confidential. Other details, including your address and signature, will not be publically available.

A non-redacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

You should not include any personal information in your comments that you would not wish to be made publically available.

Your details will remain on our database and may be used to inform you of future planning policy matters and procedures. If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

Please send completed forms to planning.policy@nwleicestershire.gov.uk or

Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Wednesday 8 January 2020



- KEY
- Site Boundary
 - Existing Trees
 - Existing hedges
 - Proposed residential development
 - Proposed indicative streets
 - Proposed indicative spaces
 - Proposed public open space
 - Proposed Footpaths
 - Existing Public Right of Way
 - 1m Contours

Schedule

Land Use	Area (Ha)	Av. Density	Estimated No. Units
Residential	46.9	30-35	1500
Public Open Space	46.0		

Total Site Area = 92.91 Ha



Project: Park Lane, Castle Donington

Client: LSH

Drawing Title:

Illustrative Layout - Option D

Drawing Number: A111790 103

Rev: -

Scale: 1:5000 Sheet Size: A3 Date: 21/01/2019

10th May 2018

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Strategic Growth Plan (Leicester and Leicestershire)

SENT BY EMAIL (strategic.growthplan@leics.gov.uk)

Lambert Smith Hampton
3 Hardman Street
Spinningfields
Manchester
M3 3HF

Our Ref: PDC/PS/AC/180510

Dear Sir / Madam

REPRESENTATION TO THE STRATEGIC GROWTH PLAN CONSULTATION 2018

LAND AT HOME FARM, PARK LANE, CASTLE DONINGTON

Lambert Smith Hampton (LSH) writes on behalf of our client, DJ&SC Smith who owns a strategic area of land that is operated for agricultural purposes by DJ&SC Smith from Home Farm in Castle Donington. This correspondence represents our client's response to the current consultation to 'Our Vision and Growth' as set out in the Strategic Growth Plan (SGP). The SGP sets out an ambitious and transformation vision for the delivery of new homes and employment land over the extended plan period from 2036 and 2050.

The purpose of this consultation response is first to confirm our client's position in relation to the availability of this strategic land to facilitate and deliver part of the wider SGP's objectives. Secondly this response will also critique the content and direction of the SPG and its supporting evidential base that has informed the strategic direction of the SGP. Thirdly we will seek to demonstrate at this early stage how our clients land interest can help support and not prejudice the long term vision in relation to the impact of SGP's objectives on North West Leicestershire (NWL).

From review of the SPG and the evidential base that has informed its direction, we will seek to review the following documents as part of our client's response, and this will include:

- Housing and Economic Development Needs Assessment (HEDNA);
- Joint Position on Housing and Employment on Land Supply 2011-2031 (March 22018)
- Landscape and Green Infrastructure Project;
- Strategic Flood Risk Assessment;
- Strategy Assessment of Transport Impacts;
- Sustainability Appraisal and Habitat Regulation Assessment
- Equalities & Human Rights Impact Assessment;
- Utilities Capacity Study; and
- Water Cycle Study.

The Strategic Land Opportunity

At this very early stage, our client would like to make the relevant authorities aware that their strategic land interest is available for development to help facilitate key aspects to the SGP and we trust that this strategic land can be considered as part of the 'call for sites' across the SGP. Through a collaborative approach our client would like to positively engage with the relevant stakeholders to explore this strategic opportunity in more detail to allow more formalised proposals to be drawn up over the next 2 to 3 years. LSH consider that such an approach can help galvanise the delivery of SPG but also help strengthen NWLC's role in the identification of suitable land to support land requirements beyond 2031. The long term availability of this land will help shape the emerging NWL Local Plan (NWLLP) Update to ensure that sufficient land can be available to facilitate both the employment and housing requirements as set out in the SPG. Our client is committed to engaging with a robust approach through evidence to confirm that the site opportunity is both deliverable and represents sustainable development between 2031 and 2050.

The Site

The proposed strategic land is in our clients control and extends to approximately 95 hectares (235 acres) and covers land to the north and south of Park Lane. The extent of the land is shown on the attached two drawings. The site sits to the immediate west of the Housing Allocation H1c in the adopted NWL Local Plan (NWLLP) (2011 to 2031) and extends to Home Farm and the River Trent to the west. The H1c allocation in the NWLLP similarly covers land to the north and south of Park Lane. The allocation has secured outline planning permission (LPA Ref: 09/01226/OUTM¹) for 895 dwellings, a new western relief road linking Back Lane with Hill Top and includes 6ha of new employment uses, a new primary school, public house and associated open space. The outline planning permission details a new roundabout junction at Park Lane which provides access through to Back Lane to the north and to Hill Top to the south. The northerly boundary of the strategic site extends to the employment allocation (Policy Ec3) (more commonly referred to as East Midlands Distribution Centre (EMDC)) of the NWLLP which is centred off Arundel Avenue. Our client's strategic land is located to the immediate south of the railway sidings to the south west of the existing Marks and Spencer Regional Distribution Centre (RDC).

The proposed strategic land is currently well served by Park Lane which runs through the middle of the land and provides direct access to the main settlement of Castle Donington to the east and Home Farm to the west where Park Lane terminates. The land is generally flat with limited topographical constraints that would render development options unviable. There is limited

¹ LSH can confirm that there have been subsequent changes to 09/01226/OUTM, including a NMA application 16/00318/NMA and 16/00321/VCUM, 16/00465/VCUM, and LSH can confirm that the NMA was approved in January 2017. The new western relief road has also been subject to a realignment of the southern relief road roundabout (16/00301/FULM).

natural habitat in terms of tree and hedgerow coverage beyond those demarcating specific fields. The eastern extremity of the site is located approximately 1.3 km from the defined town centre at Castle Donington. The western extremity (Home Farm) of the site is approximately 2.2km from the defined town centre. The strategic site includes a triangular shaped parcel of land to the south of Park Lane which mainly comprises arable agricultural land. To the south of the strategic site is land that is used as part of the Download Festival that is held in early June, this is leased by our client to the operators of the Festival but is not to be included for consideration.

The Proposal

At this interim stage our client does not have a definitive proposal to present to the Joint Authorities; however, it clarifies its intent to make available the strategic land to accommodate future development growth that can make a significant and positive contribute to the Northern Gateway ambitions within the SPG. Given the immediate location to EMDC and the existing railway sidings LSH recognise that the site is very well placed to facilitate further employment land that would include a mix of B Use Classes. Together with the existing EMDC this could create a significant hub of economic activity for the city region that will take advantage of the existing and planned transport infrastructure. Our client recognises that in order to deliver an inclusive, sustainable and mixed community, there is an opportunity to create new residential uses which build on the expansion of the H1c residential allocation. At this time our client is flexible on the type of land uses that can be delivered over the long term in line with the SPG time horizon to 2050. It would be difficult to gauge the likely and detailed composition of land uses at this time but the site can certainly provide for the potential notional housing and employment needs beyond 2031 that are currently unmet in the SGP. The detailed composition will need to be considered at a more appropriate time and would need to respond and reflect future demand as it arises over the plan period beyond 2031.

Context

Subject to the strategic decision making and the Joint Authority's appetite to collaborate with our client in the delivery of the above strategic land, LSH will also seek to engage with NWLC at an early stage. This is important given the recognition by the Joint Authorities that there is a clear deficiency in terms of the current employment land and housing requirement delivery up to 2036. The SGP is not a statutory land use document and as such our client recognises that it will be imperative that any land promotion at this strategic site will also require extensive consultation with NWLC who have responsibility for the statutory development plan covering the strategic site. We understand that given the deficiency in employment land requirements in NWDC the local planning authority have confirmed that they are seeking to update the recently adopted local plan (November 2017). Policy S1 of the Local Plan confirms that the Council will commence a review of

the local plan within three months of adoption in light of the deficiency. In February 2018 the Council published a Regulation 18 Local Plan Partial Review – Issues Consultation² that was placed on consultation to April 2018. LSH confirm that the principle reason the Council are reviewing their local plan is due to *‘a shortage of employment land up to 2031 compared to what is needed as identified in the Housing and Economic Development Needs Assessment (HEDNA)’*, as well as *‘the possible need to accommodate additional housing arising from unmet needs in Leicester city’*. The partial review also acknowledges the draft SPG.

From our review of the SGP, it is clearly recognised that there is significant growth estimated across the Joint Authorities with a 1m population centred on a thriving and vibrant city that is supported by a distinct and vibrant city region supported by a network of market towns, three universities and a international airport. The city region has also been earmarked for significant infrastructure investment which will collectively cement the city region as a key component of the UK economy. This is reinforced by key parts of the ‘Midlands Engine for Growth Strategy’ (March 2017) (and Midlands Connect) that will help build on the city region’s existing great location with continued and improved connectivity with the wider UK.

The SGP sets out three time horizons, the first relates to the 2011 to 2031 period which is covered by existing local plans across the nine local authorities. The evidence confirms that 96,580 new homes are required over the Housing Market Area (HMA) and this reflects both the Government’s population growth estimates and change in the composition of households that reflects the ageing population but also allows for migration levels. In terms of the employment land requirement, the SGP confirms that between 367 and 473 ha of land will be required and additional land will be required for strategic distribution facilities. The SPG recognises that only Leicester City Council has declared that it will not be able to meet its expected housing requirements over the period to 2031 and have agreed through a Memorandum of Understanding (MoU)³ the agreed distribution of housing and employment land across the whole city region.

The second period relates to 2011 to 2036, whereby the SPG confirms that over this period there is a need for 117,900 new homes and between 459ha to 497ha of employment land and again additional land for strategic distribution facilities. Similar to the housing position, the spatial distribution of this demand will need to be agreed through a MOU between the nine local authorities.

The third period relates from between 2031 to 2050, and the SGP acknowledges that long term estimates are more difficult to predict with any degree accuracy. However, despite limited and reliable estimates of population growth or household changes, nor economic forecasts for this

² The Local Plan Affects Everyone. Have your Say#LocalPlanMySay

³ Leicester and Leicestershire Joint Position Statement on Housing and Employment Land Supply 2011 to 2031 (Dated March 2018)

period there still needs to be recognition of the level of growth that could be accommodated during this period and this is set to be agreed on a notional basis. The draft SGP confirms that neither Oadby and Wigston Borough Council nor Leicester City Council will be able accommodate their needs beyond 2031. As such in order to meet all the unmet needs there is an acceptance that this unmet demand will need to be shared with neighbouring authorities to ensure that the needs of the HMA and FEMA are fully facilitated.

The SPG confirms the significant level of committed investment in infrastructure and services at the regional level and it will be essential that the housing and employment needs are well positioned to maximise their connectivity and links with this infrastructure to capitalise on the investment that it will bring and enable transformation change to the city regions local communities.

The SGP clarifies that the local economy is recovering from the last recession but it is not complacent in that it recognises that productivity remains below the national average and there remains an opportunity to grow key sectors over the long term. The economic growth in the SPG seeks to build on the Midlands Engine Strategy which has been developed in sync with the Government's economic growth and prosperity ambition linked to the emerging UK Industrial Strategy. The SGP seeks to build on existing business sectors and areas of existing opportunities, key infrastructure and economic assets. For example the strategic land is very well placed to build on the success of East Midlands Airport and the proposed East Midlands Gateway (Strategic Rail Freight Interchange), as well as the recently developed East Midlands Distribution Area (EMDA) which includes its own rail terminal. The growth around Castle Donington will also help create increased household and employment access to the proposed High Speed 2 (HS2) station at Toton. The strategic site also sits at the heart of significant road and rail improvements as set out in Figure 4 of the SGP with strong connectivity to Smart motorway improvements along the M1 (junctions 19 to 23a) and the M1 Junction 23 / A512 improvements.

Notwithstanding maximising the economic potential of the city region, the SPG recognises the need to protect its key environment, historical and other assets. Although it is recognised that despite having few national and international constraints there are key features that are worthy of protecting and these key features have been identified for protection over the long term.

The draft SGP recognises the world class cluster of economic development that is already well established in the city region and the SGP will seek to grow this further in a sustainable and sensitive way to ensure that there is not too much growth focused in one particular area and that the impact of local communities and the environment is not adverse. However, there is also recognition in the SGP that the lack of investment in essential infrastructure is holding back the city region and that the above infrastructure projects will help increase productivity through increased connectivity and create a more balanced approach to development distribution over the near to long term.

In relation to our client's strategic land interest, LSH note that the proposed strategy is set out in Figure 5 of the SGP. This confirms that the land interest sits in close proximity to the proposed Northern Gateway and is nestled between the significant infrastructure around East Midlands Airport, the Strategic Rail Freight Interchange and Castle Donington racecourse and sits at an important axis on the M1, A42 and A50 highway infrastructure. The Northern Gateway is a secondary growth area behind the central city approach which is centred on Leicester. Table A of the SGP confirms that the notional capacity for new residential units in the Northern Gateway is 10,000 homes. From the HEDNA which informed the SPG indicates the amount of employment land that will be required for the two main periods (2011-2031 and 2011-2036), Appendix A (Table 3) confirms that NWLC will need to deliver between 50-56ha of land for Use Classes B1a/b (offices and research and development), 4ha of Use Classes B1c/B2 (Light Industry/General Industry and 21ha of small Use Classes B8 (Storage and Distribution). The SGP confirms that it is confident that the level of employment land can be identified through the emerging local plan.

Our client agrees with the SGP approach to the spatial distribution and any new employment should be first well located to key strategic highway and rail infrastructure but also be well located in close proximity to new and proposed residential development areas. This approach will maximise the opportunity to reduce strategic commuting by car but also increase localised public transport. However, from review of the evidential base the exact definition of the Northern Gateway is unclear, in that it's discussing being around Loughborough and Shepshed and does not necessarily encompass land which is actually immediately located adjacent the existing and planned transportation infrastructure or East Midlands Airport and our client would recommend that this is reconsidered as the land around Castle Donington could be better placed to accommodate the growth anticipated in the Northern Gateway.

Evidence Base

The SPG has already been influenced by a significant level of evidence to support the strategic direction that the Joint Authorities have taken in delivering their future vision for city region. For the purposes of our client's response, LSH have reviewed the relevant documents in relation to the implications on the proposed strategic site and its contribution to deliver relevant parts of the growth set out in the SGP as well as its impacts on the environment and other material considerations.

Housing and Economic Development Needs Assessment (HEDNA)

In January 2017, Leicestershire County Council, the nine local authorities and the Local Enterprise Partnership (LEP) commissioned GL Hearn to produce a HEDNA that assessed the future housing and economic needs of the city region. This sought to quantify the level of land and floorspace that would be required for the plan period from 2011 to 2031 and 2036. The HEDNA identifies a relevant Housing Market Area (HMA) and a Functional Economic Market Area (FEMA) to help inform the strategic estimates for growth based on Office for National Statistics (ONS) linked to

travel to work areas and trend-based demographic projections. The HEDNA was developed and consistent with the objective assessment need approach set out in national planning guidance (NPPG) that is not influenced by policy targets.

In relation to the context of the proposed strategic site in NWLC, the HEDNA baseline position (ONS 2014-based estimates) found that the population growth up to 2036 will be 14,143 persons, and this would represent a 6,072 increase in households. In the city region as a whole the HEDNA estimates that over 4,000 new homes are required across the HMA per annum up to 2036. The HEDNA also considered a demographic need based on 10 year migration trends. This scenario shows that the population growth will be 18,873 persons up to 2036 which represents a 20.1% increase with a workforce growth of 9,171 persons with a total estimated housing need of 378 dwellings per annum.

The HEDNA considers the economic dynamics and growth potential across the city region through a demand based assessment. The baseline scenario shows the economy to grow by 2.3% per annum (GVA growth) which is consistent with the long term economic trend between 1993 and 2010. The anticipated growth is stronger than the region (2.0%) and nationally (2.2%). The HEDNA considers a Planned Growth Scenario allowing for the significant planned investment and pipeline development linked with the East Midlands Gateway Strategic Rail Freight Interchange as well as a number of major distribution schemes and road infrastructure projects as defined by Midlands Connect. This Planned Growth Scenario will see the GVA increase to 2.5% pa across the city region, however, it is estimated that NWL will outperform this city region growth and will achieve between 2.7% and 2.9% per annum. The Planning Growth Scenario estimates the enhanced employment growth and productivity improvements to the baseline and delivers a jobs growth of 99,200 between 2011 and 2036 representing 0.7% per annum and matches the UK and regional performance and exceeds the historical growth (of 0.4%). The HEDNA seeks to balance the estimated home and jobs growth after taking into account the age structure of the population and the economic growth in NWL that predicts a higher level of housing needs and above trend immigration relative to the 10 year trend based demographic. The HEDNA found that NWL had a demographic need of 378 dwellings per annum to 2036 but an economic need for 448 dwelling per annum. Paragraph 6.4 of the HEDNA confirms:

‘it is reasonable to conclude that the comparatively strong employment growth expected in NWL will result in above trend in-migration’.

The HEDNA in the context of housing and jobs balance further concludes in paragraphs 6.6 and 6.7 that:

‘In NWL, the upward adjustment to housing need required to support employment growth is particularly influenced by the stronger relative employment growth expected within the district

influenced by the delivery of major development schemes such as the East Midlands Gateway Strategic Rail Freight Interchange’.

‘In a plan making context, upward adjustments to housing provision to meet unmet needs from other areas will support work force growth within the recipient local authority. In this context, and with a view to avoiding double counting, the higher economic drive need in Melton and NWL (our emphasis) could potentially be met through agreeing an alternative distribution of housing provision through the Duty to Cooperate.’

The HEDNA also considers the market signals for the supply and demand for affordable housing different types of housing typologies (1, 2, 3 and 4 bedrooms) as well as the types of affordable housing (intermediate and social/affordable housing) for the different LA’s. The HEDNA also considers the need for starter homes which were introduced as part of the Housing and Planning Act 2016 and the need for specialist housing for older people and student accommodation over the plan period.

At this time, our client generally supports that economic driven demand for new housing in NWL as this reflects the likely residential growth linked to the economic activity that is planned. It makes sense to create new housing that is well located to new employment and transport infrastructure to reduce the need to travel in the future. However, given the longevity of the SGP and the likely changes in the housing and employment market we would recommend that the HEDNA is regularly reviewed on a year or bi-yearly basis to ensure that a thorough understanding of the housing and employment market is considered over the extended plan period as this would ensure that a more sustainable and phased delivery mechanism is secured.

The HEDNA considers the future estimates for the B-class employment land across the FEMA. The assessment is based on the need for B1 and B2 floorspace on the basis of full-time equivalent employment growth arising from the Planned Growth Scenario. The assessment adopted is detailed and covers 21 sectors and reviews employment density to estimate net growth in floorspace. The HEDNA applies a number of key assumptions to the labour demand as well as reviewing past completions. The results found that between 177 and 215ha of land for office development can be delivered through consideration and review of labour demand and completion trend scenarios. For industrial floorspace, there is an unlinked correlation between past employment and floorspace trends, where job numbers have fallen over time but floorspace numbers have not, demonstrating that floorspace gains deliver more productivity achieved through capital investment in technology. The Planning Growth Scenario estimates that the manufacturing GVA will grow strongly and it will be appropriate to plan for additional manufacturing floorspace and as such more emphasis should be placed on B1c and B2 Use Classes. For NWL the HEDNA found that the completions trend was higher than the labour demand scenario over the plan period.

We note that the HEDNA does not allow for the churn of replacement employment floorspace arising from the planned or unexpected loss of poorer quality floorspace to other alternative land uses and conversions. Therefore the figures within the HEDNA should be considered as minimum. In relation to NWL the HEDNA confirms that the employment land needs through to 2036 is between 50-56ha of B1a/b uses, 4ha of B1c/B2 uses and 21ha of small (under 9,000 sq.m) B8 uses as a minimum.

At this interim stage, our client on review of the HEDNA generally agrees with the methodology approach in that it clearly takes a positive approach to delivery of transformation change in the city region linked to wider economic initiative fostered by the Government's UK Industrial Strategy and the West Midlands Engine. Our client agrees that any future employment land (and related residential growth) should be focused in close proximity to the major infrastructure projects that are being invested in the city region. This approach will ensure that significant gains in local productivity are achieved and at the same time reduce the need to travel which will have significant benefits to economy and facilitate genuine sustainable development principles at this strategic level. Our client would also argue that the future success of these infrastructure projects will also be influenced by the availability of affordable and readily available developable land in close proximity to these infrastructure facilities that will maximise the return on investment and provide a qualitative improvement to current employment land portfolio in the city region. This will make Leicester and Leicestershire more attractive to the commercial investment market in that an abundance of readily available land is available and can be delivered to market in a relatively short timescale. This approach provides both confidence and certainty to the market and will ensure stability and surety in the employment land development portfolio in the city region.

Leicester & Leicestershire Joint Position on Housing and Employment Land Supply (2011 to 2031)

As set out above the HEDNA provides a baseline and planned growth scenario for housing and employment land across the city region through to 2031 and 2036. The Joint Authorities have produced a Joint Position Statement (the Statement) in March 2018 seeking to address some of the redistribution of housing matters that the authorities need to agree at the strategic level. The Statement confirms that housing schemes in the pipeline will deliver the majority of the identified need to 2031. The Statement confirms that as of April 2017, 22,000 new homes had been built between 2011 and 2017, a further 41,000 homes are committed (under construction or with planning permission and estimated to be built by 2031). A further 19,000 homes are projected for delivery by 2031 as identified by allocations in adopted or draft local plans. There is also an allowance of 5,000 dwellings through suitable small sites. The trajectory for new housing shows that there will be anticipated shortage of housing land supply in Leicester city and that the Joint Statement of Cooperation (November 2017) confirmed that the shortfall can be met in other

parts of the HMA when a shortfall is identified. The proposed distribution is to be confirmed via an agreement of memorandum of understanding (MoU). A MoU was first mentioned in early 2017, and would be adopted by January 2018 in the context of the estimated programme of preparing the new Leicester local plan. With a revised programme it is expected that the MOU will be published in the summer of 2018 and once the unmet need is robustly quantified. The Statement represents a Joint Position Statement to demonstrate that the OAN can be met in full across the HMA and FEMA and in advance of the more formal MoU.

Our client understands the difficult position the Joint Authorities may be facing and it is recognised that the Northern Gateway growth area can help provide an opportunity to accommodate the unmet demand whilst also providing better positioned housing and employment growth that is in close proximity to the proposed rail and road infrastructure as part of the Midland Connect. Growth in this location can also build on existing infrastructure at Castle Donington and East Midlands Airport. The Statement also considered the result of the employment land supply and demand as set out in the HEDNA and the implications on the spatial strategy. The statement confirms that in the context of NWL, the assessed need for employment land to 2031 is 65ha to 66ha of land; however, the statement confirms that there is only a supply of 50ha, showing a potential shortfall. The Statement confirms acknowledgement of the shortfall but recognise that will be addressed by NWLC who are scheduled to progress on a new local plan to specifically deal with this shortfall in the next year. The statement confirms that there is reasonable expectation that the available supply will ensure that the minimum requirements for additional land to 2031 (and to 2036) can be met and even exceeded at NWL.

LSH can confirm that the site at Park Lane can be available to meet the shortfall and would argue that our client's land is in a highly accessible strategic location in close proximity to East Midlands Airport, the East Midlands Gateway (Strategic Rail Freight Interchange). Its well connected location will ensure that a logical long term solution can be made available to accommodate the Joint Authorities ambitious employment land requirements and contribute to the sustainable redistribution of employment (and housing) land to NWL.

Leicester and Leicestershire Sustainability Appraisal for SPG

As part of the evidence base, the Strategic Planning Working Group has commissioned a Sustainability Appraisal (SA) of the SGP to assess the appropriate balance between environmental, economic and social objectives. The SA identifies the sustainability implication of the different options that were considered before deciding on the preferred draft growth strategy which is now presented through this consultation. The SA seeks to review, balance and recommend ways to reduce any negative effects and increase the positive outcomes from the strategy. The SA scoped out a number of key issues that would need to be developed, and these included:

- Biodiversity and geo-diversity;

- Health and well-being;
- Housing;
- Employment and economy
- Transport and travel;
- Climate change;
- Landscape and land;
- Cultural Heritage;
- Water; and
- Waste and minerals.

The SA sets out key sustainability objectives against these key issues to allow a high level consideration of the sustainable benefits the SGP will deliver against differing alternative options and the baseline position and overall policy context. The Stage2 of the SA involved the identification and assessment of reasonable alternatives. These related to a number of different options for delivering the housing growth between 2031 and 2050. It is considered that the land use option to 2031 has already been adequately considered through the local plan process at the local authority level.

The SA first considered two options in relation to the level of growth; the first was based on the projection of housing need for the period 2011 to 2036 and a notional requirement for new housing over the period 2031 to 2050 of 90,500 homes. The second option sought to test a higher target representing 20% more than the notional projected housing requirement. This was also tested against greater flexibility in achieving housing delivery to support greater economic growth aspirations. The SA also considered the distribution of housing and employment development and focused on six reasonable alternatives that established the setting of the amount of growth and how this would be distributed to key locations across the HMA and FEMA. This involved different levels of housing growth in each area but focused on the following broad strategies:

- Option 1: Focus on the Leicester Urban Area;
- Option 2: A Greater Focus on Market Towns;
- Option 3: Employment / Infrastructure Led;
- Option 4: New Expanded Settlements;
- Option 5: Dispersed Growth; and
- Option 6: Continuation of Established Trends.

The two different growth scenarios were applied to each of the six alternative spatial options and this allowed the effects of how these spatial options would differ should the growth be higher or lower. This resulted in twelve options being tested by the SA. Following the results of the process, it was considered that a hybrid option should be developed which reallocated the housing growth

and took different elements of some of the options tested. This hybrid option formed the basis of the draft SGP.

In terms of the implications of our client's strategic land interest at Castle Donington, the SA (NTS) concluded in paragraph 2.6.6 that:

'In the Northern Gateway area the homes are again likely to be in a new settlement and expansion to existing urban areas (our emphasis in the context of Castle Donington) such as Loughborough / Shepshed. Given the relationship between housing and employment, it is considered appropriate to locate housing growth close to employment growth generated by Loughborough, the strategic rail freight interchange and the HS2 interchange, and growth of the airport'.

We also note that the SA found that high growth levels in Leicester city were considered to be inappropriate in that it would have greater effects on biodiversity, health and wellbeing due to the loss of open space. It was also considered that planning for lower growth in the city is to be unreasonable given the on-going shortage of homes and the inability to meet needs fully. The growth focused on the market towns is considered appropriate given the committed and significant developments in the pipeline for these areas up to 2031 and beyond. However, paragraph 3.6.9 of the SA (NTS) also concludes:

'At Loughborough / Shepshed, the Northern Gateway will also increase development opportunities in this location. Focused growth at other market towns would not take full advantage of economic opportunities and strategic infrastructure upgrades'.

Likewise the SA has confirmed that the hybrid option is in actuality the preferred strategy for the SGP as it would generate the most benefits in terms of employment and housing growth balanced against other environmental considerations. Our client shares the same view of the SA, whereby we agree that the focus of growth at key areas of committed economic investment and infrastructure capacity is the most sustainable option for the city region in that it will reduce the need to travel at the strategic level and reduce the length of trips and encourage more sustainable modes of travel locally.

In conclusion, from the review of the SA LSH confirm that we broadly agree and support the conclusions whereby the SGP provides the best and most sustainable location for long term growth to provide a city region wide framework from which statutory local plans can be prepared.

Leicester and Leicestershire Habitat Regulations Assessment (HRA) for the SGP (February 2018)

A Habitat Regulation Assessment (HRA) was commissioned by the Strategic Working Group preparing the SGP to review to identify any aspects of the draft SGP that could result in a adverse

effect on the integrity of Natura 2000 sites/Special Areas of Conservation (SAC) or Special Protection Areas (SPA's) or Ramsar sites. This considered the effect on these habitat assets in terms of them in either isolation or in combination with other plans and projects. The requirement for an Appropriate Assessment is set out in Article 6 of the EC Habitats Directive 1992 and interpreted through the Conservation of Habitats and Species Regulation 2017. The objective of this legislation is to maintain, restore, at favourable conservation status, natural habitats and species of wild fauna and flora of community interest. It was therefore considered an Appropriate Assessment should be undertaken on the SGP at a high level.

The HRA concludes that there are no likely significant effects on the Rutland Water SPA/Ramsar Site as a result of the strategic areas of growth. Indeed the proposed land at Northern Gateway is clearly not in close proximity to this specific designation and as such should be fully supported. Further the HRA considered the likely significant effects on the River Mease SAC. It was found that increased levels of pollution from waste water treatments works were likely to occur due to increased levels of effluent being treated. However, our client's strategic land interest is not located in the River Mease SAC catchment area and therefore there is no evidence that the Northern Gateway proposals or our proposed strategic site would lead to a likely significant effect on this important SAC.

After review of the HRA, LSH can conclude that the Northern Gateway would represent an appropriate location to deliver significant economic and housing growth for the city region without having wider implications on any registered European sites and therefore should be fully supported by the relevant local planning authority to 2050. However, our client recognises that if the proposed strategic land is to be released in the future to accommodate the anticipated growth levels, then any future masterplanning exercise would need to undertake more detailed impact analysis on localised bio-diversity and ecological assets.

Leicester and Leicestershire Strategic Assessment of Transport Impacts

As part of the consideration of the SGP, the Working Group have commissioned a high level strategic transport modelling investigation to review the potential impacts of the SGP growth proposals for the period 2036 to 2050. The Strategic Assessment of Transport Impacts (SATI) also sought to assess the impacts of committed transport infrastructure, including the proposed Midlands Connect Strategy involving the major rail and road infrastructure upgrades. The SATI utilises the Leicester and Leicestershire Transport Model (LLITM) which will forecast likely future travel pattern changes that will occur between 2036 and 2050 as a result of collective infrastructure and the proposed SGP. This includes the proposed housing and employment growth levels as set out in the SGP. The transport evidence was also undertaken to help contribute to supporting the identification of other areas of investment in the strategic transport network that may also be required to support the wider delivery of the SGP up to 2050. This

process will help the regional partners devise a planned and structured approach to deliver the increase housing and employment delivery in the SGP .

In terms of the conclusions of the SATI, the evidence assessed the transport impact of the SGP proposals in relation to the well established relationship between residential population growth and increased transport demand. The evidence base supports that the scale of growth proposed in the SGP across the city region requires long term strategic planning and delivery of supporting infrastructure. Whilst the scale of population growth will undoubtedly create stress in the highway network, the results demonstrate that planned spatial distribution and growth can only be accommodated through the delivery of the strategic transport infrastructure as proposed by Midlands Connect. The proposed growth cannot be delivered without this investment. The SATI finds that the highway network can broadly operate and support the proposed growth with relatively small detriment to 2036 with additional and targeted investment in identified congestion hotspots. However, by 2051 the growth would result in greater impact in terms of reduced average speed times and increased delay.

Our client recognises that when significant growth is delivered in specific area then it is inevitable that there will be a possible impact on the highway network and our client retains that solutions at the Northern Gateway can be delivered to maximise and utilise the investment that will be delivered through Midlands Connect. Our client would be willing to explore how we can contribute towards a comprehensive transport strategy at the local level that can support the reduction of more strategic traffic movements that occur across the city region. From review of the evidence, there is no reason on highway planning grounds that the proposals at the strategic land at Park Lane should be disregarded at this stage. Through careful monitoring and review of the likely traffic generation at our client's strategic land, they are committed to working alongside the Joint Authorities to delivering a land use solution that can help address and reduce the length of journeys to that which currently occurs. In conclusion further investigation is likely to be required to test the road and rail capacity if a significant level of growth is to be delivered at the proposed strategic land. Subject to the general acceptance that the site represents a sustainable option within the SGP, then our client is willing to explore and invest in further empirical data to demonstrate that growth at this strategic land can be supported in this location.

Leicestershire and Leicester City Level 1 Strategic Flood Risk Assessment

The Strategic Flood Risk Assessment (SFRA) has been produced on behalf of the Working Group on the SGP and sought to provide up to date information and guidance on flood risk across the city region and takes account of the latest flood risk information and current planning policy. The SFRA will assess the variations in the current and flood risk from all sources of flooding in the city region and identify any resultant requirements for site specific flood risk assessment.

In the context of the proposed SGP, Appendix A (Flood Risk Mapping (Index Grid 146)) of the SFRA confirms that for the Northern Gateway Area and the proposed strategic land is not subject to any identified and actual flood risk. The SFRA confirms that there has been no historical evidence of flood risk either from fluvial or surface water sources and as such our client believes that the strategic site should be considered favourably in terms of the low risk probability on flooding grounds. As such this should be a material consideration when considering the suitability of the site on flood risk grounds linked to the site's proximity to significant existing and proposed transport and employment infrastructure. As with any future masterplan due diligence, LSH would look through the local plan stage to explore the impact on flood risk and drainage levels at the local level and the impact on land further afield as part of this process given the scale of the strategic site.

Leicester and Leicestershire Utilities infrastructure Capacity Study

As part of the consideration of the SGP, the Working Group have commissioned a Utilities Infrastructure Capacity (UIC) for the city region to provide the evidence base to cover the period of the SGP to 2050. The primary aim of the UIC was to establish the likely strategic utilities infrastructure requirements and investment necessary to support the intermediate-term growth to 2031 and the long-term growth to 2050. The UIC provides a qualitative appraisal of the potential shortfalls in utility provision between current and future growth demands. The UIC considers the broad areas of electricity, gas, waste and telecommunications.

The UIC identified that in the Northern Gateway area further investigation on the electrical capacity will need to be identified both in terms of the costs for capacity upgrades to support the identified growth. This is principally due to the fact that the nearest Bulk Supply Points (BSP) is fully committed.

Similarly the UIC confirms that the gas qualitative assessment found that further investigation will be required to review the gas transmission around the Northern Gateway. In terms of the telecommunications audit the results show that superfast broadband has reasonable coverage across most of the Northern Gateway area and this is being improved over the next two years.

The UIC also considers a high level assessment of the capacity for waste collection and treatment infrastructure across the city region to meet the estimated waste arising from both the immediate term scenario to 2031 and the long term scenario to 2050. The UIC confirms that there is sufficient capacity to manage the recycling and composting of Local Authority Collected Waste (LACW). The WNA (2015) estimates that the combined capacity for recycling, composting and transfer of waste at sites that principally manage municipal waste in Leicestershire is in the region of 367,000 tonnes per annum (tpa). The operational capacity for the managing and recycling of commercial and industrial (C&I) waste is estimated to be 411,000 tonnes, with current committed

planning permissions for C&I waste offering a combined capacity for 89,000 tonnes which with existing facilities can address the shortfall identified by 2031. After 2050 the UIC found that existing and consented waste treatment facilities across the city region are unlikely to meet the treatment arising from the growth; however, there is sufficient time to monitor and review his position. The client is committed to minimising and reducing waste and would seek to engage with the relevant waste authorities to ensure that future waste management from either proposed housing or employment land uses at the proposed strategic site are designed into any future masterplan.

In conclusion, given the timescales that are proposed for the delivery of the SPG and most importantly the Northern Gateway, through a collaborative approach and subject to whether the strategic site being acceptable to accommodate the levels of development expected in this secondary growth area, then our client would be willing to discuss how the development can ensure that supporting utility infrastructure can be delivered to maximise the benefits associated with the development to its maximum potential. Further investigation in to delivery of key utility infrastructure can be considered through the emerging local plan process for NWL.

Landscape Sensitivity and Green Infrastructure Study for Leicester & Leicestershire

The Joint Authorities recognise that the key infrastructure that is proposed as part of the Midlands Connect strategy will undoubtedly bring significant economic potential. However the growth in housing and employment beyond 2031 will need to be achieved in a way that conserves and enhances the existing landscape, bio-diversity and green infrastructure. This is a key issue as identified in NPPF, which clearly seeks to conserve and enhance valued landscapes, minimise impacts on bio-diversity and achieve net gains in biodiversity.

The Landscape Sensitivity and Green Infrastructure Study (LSGIS) sought to provide evidence using a systematic assessment framework which examines the sensitivity of the landscape and its ability to accommodate the growth without impacting on the city region's key landscape qualities. The LSGIS also considers how any potential impact can be mitigated against whilst delivering green infrastructure enhancement. The LSGIS draws on a significant level of information on existing landscape and green infrastructure evidence that has produced to inform settlement specific sensitivity and capacity studies as well as local authority wide landscape character sensitivity assessment.

The LSGIS deals with the specific growth that is proposed as part of the Northern Gateway; however, we note that the Northern Gateway as shown on Figure 1.2 (Location of Strategic Opportunity Assessment Zones (SOAZ) in the Study Area) does not cover our client's strategic land interests which sits to the north of East Midlands Airport.

The National Character Area and Study Area Landscape Character as set out in Figure 4.1 of the LSGIS confirm that the strategic land sits in the Trent Valley Washlands. Figure 4.2 of the LSGIS shows that the strategic land has a number of green infrastructure assets to the west of the strategic land, which are likely to be the identified local woodland that is also located within and outside the defined strategic site. Subject to masterplanning in the future, our client believes that these existing features can be retained as they represent a significant and valued ecological asset that can add significantly to any future wider development options and be the basis of any green infrastructure strategy through the strategic land. Figure 4.3 of the LSGIS confirms that the strategic land sits outside any Flood Zone 2 and 3 and therefore the site has low probability of flooding and the finding is consistent with the conclusions of the SFRA. Figure 4.4 of the LSGIS identifies that the site is in close proximity to a SSSI, Local Wildlife Site and National Forestry Inventory. The strategic land is not located in a conservation area. There is no formal recreation and play infrastructure across the strategic land as confirmed by Figure 4.7 of the LSGIS. Figure 4.8 of the LSGIS sets out the Index of Multiple Deprivation (IMD) for the health and environment indicators. The IMD health deprivation shows that the majority of the site is 80-90% of the least deprived and the IMD environment deprivation shows that the site is broadly 80-100% of least deprived and therefore the strategic land could provide a significant benefit to any potential future employers and residents who will have access to a healthy and good quality living environment. Through robust and careful masterplanning at the local plan stages in NWL our client can seek to create a sustainable and liveable environment centred on strong and resilient green infrastructure principles that are developed around a key objective that seeks to retain and enhanced the current ecological and biodiversity assets across the proposed strategic site as part of a integrated sustainable approach to offset the release of the site to development.

Section 5 of the LSGIS seeks to quantify the landscape sensitivity of the key growth areas in the SGP. The findings confirm that the proposed strategic land is not located in the Northern Gateway SOAZ that has been tested. Figure 5.1 confirmed that the defined Northern Gateway SOAZ was found to have a moderate sensitivity for both residential (2 to 3 story) and employment (light industry) development. Subject to whether our client's strategic land is considered further by the SGP, then LSH would recommend that the SOAZ is extended to include the strategic site or it is tested in isolation. However, LSH believe that the site is unlikely to be any more sensitive than moderate as found for the Northern Gateway and therefore is likely to be comparable in terms of its impact. Indeed Figure 6.1 of the LSGIS confirms that the strategic land is covered by a moderate sensitivity and is covered by the Trent Valley Landscape Character Area (LCA). LSH note that a detailed sensitivity evaluation has been undertaken across the Trent Valley LCA and it was concluded that the landscape is considered to have an overall low – moderate sensitivity to residential and commercial development. The rationale is due to the LCA's proximity to existing development and infrastructure including existing settlements, the transport infrastructure, multiple pylon lines, the M1 and A50 transport infrastructure and East Midlands Airport.

We argue that through a robust masterplanning of the strategic site and with engagement with the existing residential and employment land allocations to the west and north-west of Castle Donington a fully integrated and seamless extension to Castle Donington for the period 2031 to 2050 could be realised with little impact on an identified low to moderate sensitivity. As part of any future masterplanning we would seek to conserve and enhance the landscape character of the Trent Valley and follow the guidance set out in the landscape and green infrastructure guidance set out in the LSGIS.

The LSGIS deals specifically with SOAZ for the Northern Gateway and its impact is set out through a detailed methodology which considers a variety of criteria. Given the time horizons available on this consultation to the SGP, our client has not been able to consider the likely sensitivity and review the criteria against the strategic land or the Trent Valley LCA. In moving forward positively and through a collaborative approach with the Joint Authorities and NWLC we propose that a similar exercise could be undertaken for the strategic land to validate that the SOAZ for the strategic land is likely to be similarly moderate to that found elsewhere in the Northern Gateway. With the detailed methodological approach adopted to date, to ensure consistency with this approach then it may be appropriate to engage with the Joint Authorities consultant Land Use Consultants (LUC) to extend their review of the Northern Gateway to include our clients strategic land interest. This assessment would allow our client to demonstrate that the release of their land holding would represent less (low to moderate) of an impact on the local character area to that found on the defined Northern Gateway area, which was found to be moderate.

At this time, the results show that the strategic site is unlikely to have any detrimental impact on the local character and as such should be considered favourably as an acceptable location to accommodate significant economic and residential growth in the long term.

National Planning Policy Framework

National planning policy guidance is now set out in the National Planning Policy Framework (NPPF, March 2012) which has merged and replaced almost all previous planning statements and guidance notes. The main theme of the NPPF throughout the document is that there should be a **'presumption in favour of sustainable development'**.

Paragraph 14 explains that, for plan-making, this means:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF; or
- Specific policies in the NPPF indicate development should be restricted

For decision-taking this means:

- Approving development proposals that accord with the development plan without delay;
- Where the development is absent, silent or relevant policies are out-of-date, granting planning permission unless:
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF; or
- Specific policies within the NPPF indicate development should be restricted.

Paragraph 18 of the NPPF promotes delivering sustainable development through a strong and competitive economy that is committed to securing economic growth to create jobs and prosperity. The guidance seeks to build on the inherent strengths but adapt to both global competition and a low carbon future. Paragraph 19 confirms the Government's commitment to ensuring that the planning system does everything it can to support sustainable economic growth. This requires planning authorities to encourage and not act as a barrier to sustainable growth with significant weight placed on supporting economic growth in a sustainable way. Paragraph 20 confirms that local authorities should proactively meet the future development needs of business and the economy and paragraph 21 takes this further by removing barriers to investment which may include addressing a poor business environment or lack of infrastructure. This can be achieved through a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.

LSH believe that the SGP clearly sets out a strong mandate for economic growth especially in the Northern Gateway and elsewhere and our client is willing to identify their strategic land to help foster local inward investment in accordance with paragraph 21 of the NPPF which will match the identified need that has been identified by the HEDNA over the short to long term. The strategic site at Park Lane will also support existing business sectors that are investing in NWL already and the strategic site will help deliver a portfolio of land that can respond to rapid change in economic circumstances, but can equally provide further opportunity for expansion of clusters or networks of knowledge-driven, creative or high technology industries that may not be able to find suitable locations at present. The strategic site also provides an opportunity to facilitate flexible working practices such as co-working or incubator enterprise linked to rail and aviation investment in the Northern Gateway but also integrate with new type of residential typologies. LSH believe that the

proposed strategic land at Home Farm provides an exciting opportunity to build on the current and proposed employment landscape in the NWL and fully accords with the direction of the NPPF.

Conclusions

Our client is broadly in agreement with the general direction of the SPG and believes that their strategic land interest can help facilitate the wider economic and residential objectives of the SPG over the plan period 2031 to 2050. The SPG provides an exciting and ambitious vision to deliver transformation and long term change that is well connected to key modes of transit whether that is road, rail or aviation which could lead to significant improvements and reductions to city region movement and transport. Our client's strategic land interest represents a well connected and well contained area which is strategically located to provide a seamless extension to the existing Castle Donington urban settlement and will further build on the significant transport related infrastructure investment that is planned as part of the Midland Connect initiative linked with the Midland Engine Strategy. LSH would argue that by not seizing on this exciting strategic opportunity it would seriously prejudice the ambitions of the SGP and not capture the significant economic potential for the city region.

The results of the evidence base clearly demonstrate that there are no significant environment constraints that would render the delivery of this strategic site as unsuitable or unviable. Through a robust and transparent masterplan process as part of any local plan update at NWL we believe that the strategic offers a genuinely opportunity to curate a sustainable development platform that builds on some of the environment assets of the local area and balances these with the economic growth agenda.

In moving forward our client would like the opportunity to work in collaboration with the relevant authorities at NWL with the primary objective of securing of a long term opportunity to facilitate the ambitious objectives of the Midlands Engine for Growth Strategy and the SPG. We look forward to hearing from you in the near future.

Kind Regards

Yours sincerely,

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