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East Devon District Council
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Border Road,
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Honiton,
EX14 1EJ

Dear Sir/Madam,

REGULATION 19 CONSULTATION (FEBRUARY 2025): EMERGING EAST DEVON LOCAL PLAN 2020-2042

Introduction

Please find herein representations on the Regulation 19 East Devon Emerging Local Plan consultation made on behalf of our client Mr Simon Stokes who is the promoter of a site at Land to the north of Castle Lane, Woodbury.

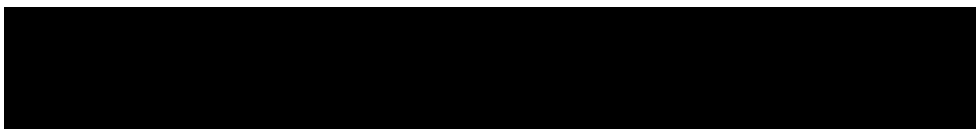
The site has been promoted through the earlier consultations on the emerging Local Plan (reference Wood_24) and are very surprised by the continued decision to not allocate it, given this is an appropriate and logical location to deliver growth to make a meaningful contribution of approximately 40 to 45 dwellings towards meeting the housing need for Woodbury.

My clients have a number of concerns with how the site has previously been considered and assessed which are elaborated on within these representations.

We have organised this response in order that it follows the format for the response form provided and allows for comments on the policies etc to be considered individually as you have required. However, we have presented our response as a comprehensive assessment of the emerging plan and the Council's approach and therefore it is important to be considered in its complete form as well.

Overview of the Plan Approach

Our client is concerned that the overall strategy of the Plan is unduly influenced by an inherent imbalance towards constraint and matters that constrain growth rather than positively planning to meet housing needs.



This is despite the Government, through the updated NPPF published in December 2024, making it absolutely clear that there is a need to substantially increase housing delivery in the UK, setting a target of achieving 370,000 new homes each year. The focus of the updated NPPF is explicitly on overhauling the planning system to address the chronic housing crisis and to support “builders not blockers” and to deliver growth.

In this context it is disappointing that the Council are seeking to benefit from the updated NPPF’s transitional arrangements, particularly as it appears to have been used with the sole purpose of enabling a lower housing requirement to be pursued. Which of course will simply continue to increase the gap between housing need and supply in the longer term. A matter that will be further impacted by the Council seeking what is an unjustified and inappropriate stepped housing delivery approach.

All this is before taking into account the Plan’s over reliance on delivery from a new community that remains largely untested through the Plan process to date; an inconsistent site selection process and a proposed policy basis that seeks unreasonable requirements without any consideration of the viability and deliverability issues they will create.

Importantly until the emerging Plan is adopted, the Council will still be required to demonstrate a 5-year supply of housing land based on the new standard method (1188 dwellings per annum), which as the Council themselves recognise under current claimed supply would be less than 3 years. The need to deliver increased levels of housing must therefore be a priority for the Council both through development management and plan-making processes, requiring a step change in approach towards positively planning for growth rather than focussing on constraint and requirements.

We elaborate further on the above concerns, that we consider risks undermining the soundness of the Plan if not addressed, when discussing the individual policies and sections of the Plan below.

Chapter 3 - Spatial Strategy

Strategic Policy SP01 – Spatial Strategy

We broadly support the spatial strategy outlined in Policy SP01 which recognises the role of Woodbury as a Local Centre although we do consider that there are further site opportunities, including land at Castle Lane that have been overlooked or not assessed correctly, as raised further below in these representations, which could contribute to addressing these needs.

We are concerned regarding the reliance on the new community in respect of this Plan period. The experience of Cranbrook demonstrates the long lead-in times in respect of delivery, with first occupations at Cranbrook occurring some 20 years post allocation (having been arguably a more defined proposal than the new community at that stage). We provide additional comments on this in relation to Strategic Policy WS01.

Strategic Policy SP02 – Levels of Future Housing Development

Strategic Policy SP02 proposes a provision of 20,909 dwellings across the District. This is based on the transitional arrangement of 80% of the new standard method of 1188 dwellings per annum over the 22-year Plan period, equating to 950.4 dwellings per annum. However, rather than suggest this is delivered at a consistent rate, a stepped approach has been applied. This provides for 850 dwellings per annum across the first 12 years of the Plan period (2020/21 to 2031/32) and 1070 dwellings per annum for the latter 10 years of the Plan period (2032/33 to 2041/42).

This means that for the first 12 years of the plan period housing delivery is proposed at just 71% of the new standard method, significantly below the required 80% set out in the NPPF transitional arrangements. Indeed, on that basis, the Council would only reach 80% of the local housing need figure in 2042, by which time a new Plan is likely to be in place. This must question whether the approach is compliant with the transitional arrangements at all.

Furthermore, the approach would mean a year on year under supply of housing against the (reduced) housing targets for 12 years of 100 dwellings per annum, resulting in a deficit of 1200 homes by 2032/33 to be made up in the remaining 10 years of the Plan. The obvious concern that arises is whether the proposed stepped approach is simply a contrived way of firstly attempting to benefit from the transitional arrangements and secondly, avoiding making the important and difficult decisions required to meet the District's substantial level of housing need.

The approach is not sufficiently justified and relies on there being issues such as 'extensive planning complexities', 'environmental constraints', 'infrastructure issues' but these are matters faced to a large extent by every local planning authority and are not unique to East Devon. These matters in themselves and collectively do not justify a stepped approach, indeed it perhaps emphasises the need to frontload the Plan by maximising delivery from a range of sites rather than metaphorically 'kicking the can down the road' by delaying delivery and then over relying on the latter part of the Plan period.

Some of the above concerns raised by the Council could be addressed through a re-consideration of the scale of allocations around the Principal, Main and Local Centres. These settlements are well suited to the delivery of a range of 'smaller'

site allocations. At the earlier stages of the Plan, the Council had in front of them a range of sites in key settlements identified as available and suitable which have not been taken forward, but if they were, they could still provide significant resilience to the Plan strategy by supporting early and increased delivery rates. The site at Castle Lane, Woodbury represents one example of an additional site that could contribute to housing delivery earlier in the Plan period.

Modification Required

As we have set out above the Plan's approach in setting a stepped housing target is unjustified, goes against the spirit of the NPPF transitional arrangements and seeks to effectively push the matter of delivering housing to meet local needs into the next local plan cycle. The Government have been clear that in introducing the transitional arrangements they expect the progress of plans to be maintained, whilst maximising proactive planning for the homes communities need. We consider the stepped approach does not support the Government's intentions.

Therefore, currently this approach risks rendering the Plan unsound in our view. To address this the Plan will need to be the subject of fundamental modification. This will include removing all reference to the stepped approach within Policy SP02 and instead including a consistent housing requirement of 950.4 dwellings per annum over the entire Plan period.

Chapter 4 – Development at the West End

Strategic Policy WS01: Development of a second new community east of Exeter

We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account.

Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed.

Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory.

It emphasises the points we have raised above in respect of spatial strategy and how the plan deals with housing delivery generally, in that over assumption of delivery across a narrower range of complex sites can only result in under supply and not meeting need. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues.

Modification required

It is important that the housing delivery rate assumed from the new community within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

Chapter 5 – Development in the Towns and Villages

Strategic Policy SD11: Development allocations at Woodbury

As we have set out above, we still consider the proposed housing provision is too low and the opportunity to bring sites forward that maximise the opportunity to deliver housing earlier in the Plan period should be further considered. As the Regulation 18 and 19 site selection processes have identified there is significant capacity at for a range of smaller sites to come forward across the identified settlements that can benefit from existing infrastructure and accessibility.

Land north of Castle Lane, Woodbury (previously Wood 24)

Our client's site at Castle Lane, Woodbury represents such an opportunity which regrettably was not given proper consideration during the site selection process, largely because of the unduly negative and inaccurate site assessment. We firmly believe that the site was not given proper consideration.

A number of previous representations have been made to the Council, including by the landowner Simon Stokes on the 26th June 2024 [in response to the further draft local plan consultation], planning agent David Seaton on the 11th January 2023 [responding to the Regulation 18 Consultation], planning agent Nicole Stacey on the 13th January 2022 [sent in light of Strategic Planning Committee meetings], and Simon Stokes, on the 27th September 2022 [sent in light of Strategic Planning Committee meetings].

These previous comments have each raised concerns regarding the site assessment exercise that the Council have undertaken, however, whilst some matters raised have been 'noted', they do not appear to have been taken into account in the site selection report for Woodbury (SAL-048), dated February 2025. This report concludes that the site was not allocated due to the high/medium landscape sensitivity and other more preferable sites at Woodbury. This is strongly disagreed with, as set out below.

The Site Selection report for Woodbury continues to repeat DCC Highway comments that have since been rebutted, stating that the site is "*relatively remote*" and "*without the ability to link to the footway along Castle Lane*". Whilst the report includes a note regarding an opportunity for a link to Webbers Meadow, as has previously been promoted, the assertion of being relatively remote has not been addressed. The site clearly cannot be considered remote given it is surrounded by existing development to the north, west and south and is within easy walking distances to a range of services and facilities including the primary school (as shown in photo 1). We would also like to clarify that the link to Webbers Meadow can be readily implemented due to the landowner retaining full rights for vehicular and pedestrian access to this land (from the land north of Castle Lane).

Photo 1 – Aerial photo of the site



In respect of landscape, the report continues to describe the site as having only a limited context of built form provided by modern dwellings adjoining the western edge and low-density dwellings along north east of the site. This completely ignores the substantial holiday park to the south and downplays the presence of the existing adjacent land uses. This is a fundamental flaw in the site's assessment and ignores its immediate context and overall relationship with existing development. It certainly is not accurate to describe the site (as the site selection report does) as a 'promontory' location, as it does not project beyond existing built form, for the reasons set out above.

The landscape assessment also alleges there are "*long distance views to the Grade I listed church and Exe Estuary*". As clarified in the previous representations, only the very top of the church tower can be seen from only a very small part of the higher (eastern) part of the site, not the church building itself. From the majority of the site, the church is not visible. You will note from the indicative layout previously submitted with the representations made on the 26th June 2024, that this eastern land could be delivered as open space. Therefore, this relationship is not considered to rule out the development potential of the site and could be easily addressed through a sensitively designed scheme.

This landscape and heritage context could certainly not on the basis of the above be considered to have the high/medium landscape sensitivity that the report claims and would be more appropriately described as low. This is a critical matter because this inaccurate description of landscape sensitivity was directly specifically and solely identified as the reason for not allocating the site. On correction of this error the site becomes a clear opportunity to accommodate modest growth at Woodbury and removes any reason for not allocating the site.

It is unfortunate then that the above landscape assessment errors have also been carried forward into the Sustainability Appraisal. In particular, the landscape impact of the site is considered to have a '*major negative effect in contributing towards the achievement of the landscape objective*'. If the assessment had been applied correctly this clearly would not have been the case and the site would have scored as a minor negative or negligible effect. Similarly, it is considered that even a minor negative effect regarding heritage inaccurately describes the minimal visual relationship with the listed church, and negligible would be a more accurate reflection of impact.

If these issues had been assessed accurately in the Sustainability Appraisal the reason for rejecting the site -adverse landscape impact - would not be relevant.

In addition to the errors highlighted above in the assessment of the site it is also considered that the Council has failed to recognise the clear benefits of allocating the site. This includes that the site forms a logical addition to the village,

representing infill development, given the site's existing development context. It will not extend the built form of the settlement into the countryside, and is an appropriate use that complements the neighbouring residential uses.

The site is well connected to existing facilities in Woodbury, and has a good relationship with the neighbouring sites and suitable site connections can be achieved. It also provides an opportunity to delivery new public open space to the benefit of the wider community and the opportunity to provide an attractive entrance to this part of the village. Through the delivery of this site and associated public open space, there are opportunities to enhance the wider public footpath network. A pedestrian route connecting to Castle Lane on the eastern boundary of the site could be delivered, taking pedestrians off Castle Lane and allowing them to walk down a purpose built, safer footpath.

The 'smaller' nature of this site (with capacity to deliver 40 to 45 dwellings), combined with strong existing infrastructure links to the adjacent site to the west, and a landowner who is actively promoting the site for development, will mean this site can come forward quickly. This will support the effectiveness of the Plan, being a site that will be delivered early in the Plan period. This will create resilience for the Plan strategy and provides the Council with flexibility to support the delivery of larger sites like the proposed new settlement.

It is also important to note that to date there have been no written objections regarding the site in the earlier emerging local plan consultations. This is a clear positive which further supports allocation of the site.

Paragraph 36 of the NPPF (2024) sets out the tests for soundness, which the plan must pass at examination. By allocating this site, it will make a meaningful contribution to housing in Woodbury, and assist the Council in meeting their duty for the Local Plan to be positively prepared, helping to meet the area's objectively assessed need.

Modification required

We believe further growth at the identified settlements should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Castle Lane in Woodbury (Wood_24) is unconstrained and there are no impediments to its delivery and as such it can make an important contribution to the Plan.

Policy SD11 should therefore be modified to include land north of Castel Lane, Woodbury (Wood_24) at as an allocation.

Chapter 6 – Mitigating Climate Change

We have previously raised concerns regarding the emerging plan's focus on ambitious policies seeking Net Zero by 2040 and the impact this has on the viability of development. This challenging ambition needs to be grounded by the imperative to tackle fundamental need for housing across East Devon. We remain concerned that the Regulation 19 plan includes a number of 'Climate Change' policies which, in some instances, may negatively impact the ability to deliver much needed development in the District. It is important that policy approaches carefully consider and evidence their implications on the ability of the Plan to deliver sustainable development to meet local needs.

Strategic Policy CC01: Climate Emergency

This policy refers to development that will generate 'significant emissions' as having to require clear justification including articulating carbon saving approaches to be incorporated in the development. The trigger for this is incredibly broad, and we have concerns regarding how this could be applied to development in the future. This needs to be further clarified.

Strategic Policy CC02: Net-zero carbon development

This policy requires all new residential development to meet the Future Homes Standard 2025, or if this is not incorporated at the point of Plan adoption, meeting the draft standards (from the 2023 consultation). However, as the policy acknowledges, this is not yet confirmed and it is clear from the evidence base that the policy approach relies on the consultation draft of the Future Homes Standard. Given this will be controlled through Building Regulations in due course, we suggest the policy is in any case unnecessary as it duplicates forthcoming Building Regulation changes.

Strategic Policy CC05: Heat networks

This policy requires all major development within 1km of an existing heat network connection to provide a connection. Furthermore, developments over 1,200 homes will be required to provide their own. Whilst a policy that *supports* making these provisions could be supported, the use of the word *should* indicates limited flexibility (albeit, it is understood it is not a *requirement*). Connections to these networks can introduce an undue financial burden on developers, and introducing such stringent requirements could challenge viability, and cause delivery delays.

Modification required

The above policies should be clarified to ensure that their requirements are clear in terms of triggers and flexibilities and do not duplicate other legislation better

suites to implement objectives (i.e. Building Regulations). The Plan needs to be clear how any requirements can be achieved without raising deliverability or viability issues that may make the Plan ineffective.

Chapter 7 - Adapting to Climate Change

Strategic Policy AR01: Flooding

Requirement B of this policy introduces a requirement *"For areas within 5 metres horizontal distance of Flood Zone 2, where there is no detailed modelling, assessment of this Zone with climate change will need to be undertaken in accordance with the most up-to-date Environment Agency hydrology, hydraulic modelling and flood risk mapping."* This appears to directly contradict national policy given such areas will include areas within Flood Zone 1 where the level of assessment is not required and sites of less than 1ha would not require a Flood Risk Assessment in any case.

Furthermore, this policy states that the flood resilient goal of the policy will be achieved by *"Ensuring that space is provided on all development sites for the inclusion of SuDS..."*. Whilst supporting the delivery of SuDS as the preferred drainage solution is appropriate (and consistent with national policy), requiring them on all sites is unreasonable as this will prevent the delivery of sites where SuDS are not feasible. The policy should instead reference the drainage hierarchy so it is clear that there is some flexibility where it is demonstrated SuDS are not possible.

Modification required

Policy AR01 should be modified so that it is inline with national policy in respect of the need for flood risk assessment and the encouragement of SuDS.

Chapter 8 - Meeting Housing Needs

Strategic Policy HN02: Affordable housing

This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant.

Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will

come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach will depend on the circumstances of the scheme.

Policy HN05: Self build

The policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable.

Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. This is unreasonable and not justified and should therefore be removed from the policy.

Modification required

Modifications to the above policies are required. For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent.

Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan.

Policy HN05 should be modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified.

Chapter 10 - High Quality Design

Policy DS02: Housing density and efficient use of land.

The policy goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

Modification required

Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

Chapter 12 - Our Outstanding Landscape

Policy OL04: Areas of strategic visual importance

The policy intends to provide a framework to protect key views and views of local landmarks. Unfortunately, this policy is incredibly broad, and we are concerned that this will be used as a 'catch-all' policy to prevent windfall development that would otherwise be acceptable. Again, it raises concerns regarding the blanket approach to designations and requirements that the Plan relies upon. Other policies like the Green Wedge (policy OL05) and Coastal Preservation Areas (Strategic Policy OL03) (notwithstanding our concerns regarding extent and definition) provide protection for areas of East Devon, and other heritage policies to protect the setting of listed buildings. This policy, if it is to be retained, requires greater clarity on its true extent.

Modification required

Both Strategic Policy OL03 and Policy OL04 raise concerns regarding a blanket and unevidenced approach towards designations which overly restricts the potential of windfall development.

For Strategic Policy OL03 relating to the CPA the extent of the designation needs further evidence and justification or the policy needs to be modified to provide the opportunity for alternative evidence to be provided and taken into account in windfall situations.

Policy OL04 needs further refinement to be clear as to its purpose as it currently appears to repeat aspects of other protectionist policies and reads as a list of ways to prevent any development that can be seen from any view, which is clearly unreasonable. The opening sentence of the policy is sufficient and does not need the further criteria to be listed.

Chapter 13 - Our Outstanding Biodiversity and Geodiversity

Strategic Policy PB05: Biodiversity Net Gain

This policy introduces a requirement for major development to deliver at least 20% Biodiversity Net Gain (BNG), which directly contradicts the statutory requirement of 10%. It is also directly contrary to the PPG that advises that Plans do not need to include policies which duplicate the detailed provisions of the statutory framework. The PPG also makes it clear that:

"Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented." (ref. 74-006-20240214)

The supporting text for the policy claims the 10% without species management provides negligible gains, and therefore a precautionary principle has been applied to ensure effective gains. The Council also claim that 20% is feasible and necessary. No evidence has been provided in the evidence base to support these positions and experience nationally in relation to achieving 10% BNG since the mandatory requirements have been in place suggest this is challenging enough.

It is also noted that despite being exempt from the mandatory BNG assessment the policy requires a statutory biodiversity metric for self-build development. Again, this is unjustified and unreasonable for development specifically exempted from these requirements by the statutory BNG framework.

The PPG requires evidence regarding why 20% is required, its impact on viability and details of how such a policy would be implemented. None of these tests have been met and policy is clearly unjustified, inconsistent with national planning policy and unnecessary given the statutory Framework now in place.

Policy PB09 - monitoring requirements for new planting schemes

This policy requires a financial bond by a developer prior to commencement of construction for 25% of the planting cost of a scheme. No justification for this policy is contained in the Plan nor the evidence base and this requirement is considered entirely inappropriate and unreasonable. Any condition or planning obligation requiring such a bond would fail to meet the relevant tests. It presumes a failure to deliver a consented scheme when other powers exist to ensure compliance. Again, it is simply adding unnecessary (and unjustified) additional requirements into the planning process that will create delay and increase costs and resources.

Modification required

Policy PB05 goes above and beyond the statutory framework without justification. As the PPG suggests there is no requirement to duplicate the mandatory BNG requirements and so the policy should be deleted.

Policy PB09 introduces a bond requirement that is unreasonable and would fail the relevant tests for applying conditions and planning obligations. It should be modified to remove reference to a financial bond.

Conclusion

The Regulation 19 version of the Emerging Local Plan raises a number of concerns regarding the ability of the Plan to be found sound.

It is clear is that the Council are facing significant housing challenges which the Government is clear in its expectation that it will need to be met through the delivery of substantially more housing. This does mean a step change in approach is required to ensure a balanced and comprehensive approach towards identifying sufficient sites to meet identified needs and considering this in the round with designations and requirements is essential.

Otherwise, the Plan will fail to demonstrate that it is based on an effective strategy underpinned by clear evidence, does not seek to appropriately meet identified needs and will limit the opportunity to deliver sustainable development.

Alongside the comments on spatial strategy and detailed policies, we do believe that additional growth should be provided to support overall Plan resilience and that our clients' site at Castle Lane, Woodbury should be re-considered given the role it can play in making Plan resilient and the inaccuracies that appear to have directly led to its exclusion.

Given the comments we have raised above, we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

I would be very grateful if you could please keep me informed of the outcome of these representations and the progress of the Plan via the email address:

[Redacted]

Should the Council wish to discuss any of these matters. I then please do not hesitate to contact me.

Kind regards,

[Redacted]

Stuart Houlet BA(Hons) MA MRTPI
For PCL Planning Ltd

[Redacted]

[Redacted]