

Appendix A - Pre-application advice letter from Hillingdon dated 1st June 2022

Officers Report

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
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Miss Georgia Goff
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Tel: 01895 250230
Case Officer: Nesha Burnham
Email: nburnham@hillingdon.gov.uk
Date: 1st June 2022
Our Ref: 2082/PRC/2021/279

Dear Miss Georgia Goff

RE: Installation of floodlights on 2 no sports courts and adjustment of condition 12 and 13 of pp 2082/APP/2007/1411 to change the permitted operating hours and use astro turf pitch

SITE: Northwood College Educational Foundation Maxwell Road Northwood

I refer to your request for pre-application planning advice and our subsequent meeting on 16th March 2022 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration. Once again, I do apologise for the significant delay in the issuing of this written response letter.

Plan Numbers: 1556-IID-SP-XX-DR-A-1003 Rev. P2 - received 21 Dec 2021
28352-1 - received 21 Dec 2021
HLS853 REV2 MUGA 1 - received 21 Dec 2021
HLS853/REV2 MUGA 2 - received 21 Dec 2021
Product description: Floodlight FL11 maxi pro, asymmetrical beam PL33T, CCT 750, DALI or DMX RDM (installation remote or on the bracket) *Preliminary Product Data* - received 21 Dec 2021
Pitch Floodlighting Compliance Report Dated 18/11/2021 - received 21 Dec 2021

Covering Letter dated 21/12/2021 - received 21 Dec 2021

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

Northwood College occupies a 3.3 hectare irregularly shaped plot located on the north-western side of Maxwell Road. The main access to the school is from Maxwell Road. The site accommodates a number of buildings, which make up the lower and upper schools and the sixth form, in addition to playing fields, a Multi-Use Games Area (MUGA), a playground, hard play space, car parking and ancillary facilities. The buildings are set back from the road by approximately 10 metres.

Despite its close proximity to Northwood Town Centre, it falls within a predominantly residential area and is bounded by residential properties to the north-east and south-west. To the north-west it is bounded by residential properties and garages and to the south-east residential

properties lie on the opposite side of Maxwell Road.

The entire school site falls within the Green Lane Conservation Area as designated in the Hillingdon Local Plan. The buildings at the front (south-east) of the site, including the Old School, Sixth Form and Library, Wray Lodge and Vincent House, are locally listed. The tree belt along the Maxwell Road boundary (north end) is protected by TPO 491. All other trees are protected by virtue of their location within Northwood Town Centre Conservation Area.

The Proposal

The pre-application submission proposes the erection of eight floodlights to light the existing Multi-Use Games Areas. The submission also proposes the variation of Conditions 12 (Timing restrictions) and 13 (Restrictions of use to the school) of planning permission 2082/APP/2007/1411 dated 11th September 2007 (Removal of existing building and construction of new early years centre and relocation of all-weather sports surface playing field approved under planning application ref. 2082/APP/2003/1103 including details of design and layout).

Condition 12 attached to planning permission 2082/APP/2007/1411 states that:

The all-weather playing surfaces shall only be used between the hours of 09:00 and 18:00 on Mondays to Saturdays, and at no time on Sundays and Bank Holidays.

Reason: To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

Condition 13 attached to planning permission 2082/APP/2007/1411 states that:

The all weather pitch shall be for the exclusive use of the school and shall not be hired out to outside organisations, which could attract additional trips during the evening peak.

Reason: To ensure that the development does not cause danger and inconvenience to users of the adjoining pavement and highway in accordance with policy AM2 of the Hillingdon Unitary Development Plan.

It is proposed to amend Condition 12 to enable access within the following times: 9.00am to 21.00 Mondays to Fridays; 09.00 to 18.00pm Saturdays; and 09.00 to 16.00pm Sundays.

Planning Policy

The proposed development would be assessed against the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM5 (2012) Sport and Leisure
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.HE1 (2012) Heritage

Other Policies:

- DMCI 6 Indoor Sports and Leisure Facilities
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DMEI 10 Water Management, Efficiency and Quality

DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 3	Locally Listed Buildings
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP HC1	(2021) Heritage conservation and growth
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF4	NPPF 2021 - Decision-Making
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

Main Planning Issues

1. Principle of development

Officers do not share the view that the community use has already been established at the school site by the Community Use Agreement that was submitted and approved to satisfy Condition 6 of application reference 2082/APP/2017/2086 for continued temporary use of the science building. The red line boundary of the site location plan attached to permission 2082/APP/2017/2086 does not include the two MUGAs that are the subjects of this pre-application submission. Furthermore, permission 2082/APP/2017/2086 was a temporary permission which expired on 14th September 2020.

Officers would therefore expect the Planning Statement accompanied with any forthcoming planning application to provide details in respect to the:

- The identified need for the sport facilities being available to local residents/clubs/community groups
 - The anticipated number of external users that would be using the MUGAs.
 - The days/hours in which the MUGAs would be available to external users
 - The changing facilities that would be available to the external users.
 - The benefits the proposal would provide to the pupils at the school.

2. Design

IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA (INCLUDING THE SURROUNDING CONSERVATION AREA):

As previously mentioned, the site is designated within Green Lane Conservation Area. The buildings at the front (south-east) of the site, including the Old School, Sixth Form and Library, Wray Lodge and Vincent House, are locally listed.

Paragraph 199 of the NPPF (2021) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Policy HC1 of the London Plan (2021) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. This is reinforced by Policy HE1 of the Hillingdon Local Plan: Part One-Strategic Policies (2012) and DMHB 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that all development will be required to be designed to the highest standards and incorporate principles of good design. Policy DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development should be well integrated with the surrounding area.

The proposed floodlighting columns and beam brackets would measure approximately 11.7 metres high. Due to the height and siting, the proposed floodlights located around the perimeter of MUGA 2 is likely to be visible not only from the street scene on Myrtleside Close, but from The Glen which is also designated within Green Lane Conservation Area. Due to their considerable height, Officers are concerned that the proposed floodlights would appear as incongruous features when viewed from the public realm on Myrtleside Close and The Glen.

It is noted that within the submitted Covering Letter that public views of the floodlights would be screened by dense tree coverage. However, this will need to be demonstrated through the submission of verified views and photomontages of the proposed floodlights. Also, if the trees around the perimeter of MUGA 2 are deciduous, it cannot be argued that they would screen the proposed floodlights as they will lose their leaves during the winter months.

3. Amenity

IMPACT ON NEIGHBOURING RESIDENTIAL AMENITY:

Policy D14 of the London Plan (2021) states that development proposals should avoid significant adverse noise impacts on health and quality of life. It also requires development proposals to mitigate and minimise potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that all development should not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space.

As previously stated, the proposal seeks to vary Conditions 12 so that the MUGAS can be used 9.00am to 21.00pm Monday to Fridays, 9.00 to 18.00pm Saturdays and 09.00 to 16.00pm on Sundays. This is a substantial increase in hours of possible operation over the existing restrictive condition. This, coupled with the proposed flood lights, would have the effect of enabling further use of the MUGAs well into the evening hours when it could be

otherwise too dark. Furthermore, the proposed varying of Condition 13 would allow external clubs/local residents to use the MUGAs, thus further intensifying the uses of these outdoor game areas.

Officers are concerned about the proposed operating hours and the potential detrimental impact it could have to the amenity of nearby residential occupiers. It is recommended that the proposed operating hours are re-considered and that alternative options are explored such as: i) reducing the operating hours; ii) limiting the number of days in which the MUGAs are used during the later evenings hours or iii) only using MUGA 1 during the the later evening hours as this games area is situated farther away from neighbouring residential properties and is partially enclosed by existing school buildings.

It should be noted that the above options are suggestions, and it would be for the applicant to explore how best to mitigate the impact of noise and disturbance to neighbouring residential occupiers. Consideration must not only focus on the potential noise generated from the MUGAs (which includes referee whistles and noise from spectators) , but also take into account the noise from the increased activity at the site and the noise generated from the parking area. It will need to be clarified within the Noise Impact Assessment the maximum number of matches which will be operating at the same time on the two separate MUGAs. Also, the Noise Impact Assessment must include details of mitigation measures such as acoustic fencing, if required. The Planning Statement should explain how the results of the Noise Impact Assessment has influenced the proposed operating hours.

Notwithstanding the details submitted with this pre-application submission, there are concerns about the proximity of the properties on The Glen and Myrtleside Close in relation to the proposed floodlights serving MUGA 2 - particularly given that these floodlights will be operating up to 9pm throughout the year to coincide with the proposed operating hours. Any forthcoming planning application must be accompanied with a Floodlighting Assessment to demonstrate that the light spill contour will not strike neighbouring dwellings or properties. Details of the Upward Waste Light Ratio should be provided to demonstrate that no light emitted directly will be above the horizontal plane of the lighting columns. Furthermore, details must be provided to explain how the floodlights will be operated/managed. Officers would expect them to be automatic and have a timer controller switch. Nevertheless, irrespective of whether light spill would fall onto the properties on The Glen and Myrtleside Close, due to the proximity of these properties and proposed hours there is significant concerns that the flood lit MUGA 2 would be visually intrusive to these residents and harmful to their amenity. As discussed above, one of the options that may be best to explore further is to only use MUGA 1 for flood lit evening use.

Based on the information that has been submitted at this initial pre-application stage, there are concerns that the proposal would cause harm to neighbouring resident's living conditions in terms of noise, disturbance and light pollution. The applicant is encouraged to explore the options highlighted in the preceding paragraphs to help mitigate the impact on neighbouring residential amenity.

4. Highways

Paragraph 111 of the NPPF (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy T4 of the London Plan (2021) requires transport assessments/statements to be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management

Policies (2020) requires the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway, junction capacity, traffic flows and conditions of general highway or pedestrian safety.

The Council's Highways Department has provided the following consultation response:

In terms of highway/transport considerations, the two planning conditions are intrinsically linked. The enquirer is therefore encouraged to provide an assessment of the likely impacts of extra-curricular activities which should take into account the extended hours of opening.

Although it is accepted that a sports use is established albeit restricted to the school only, at a future planning application stage, it is recommended that a transport statement (TS) is produced/submitted comparing the existing and predicted use/frequency profiles on a daily/weekly basis. The applicant may wish to utilise the established land use database (TRICS) within the TS to assist in determining potential vehicular trip generation impacts of the proposal. A full itinerary of current and representative daily and weekly events compared with an estimation of the extent of additional community use with likely patron numbers, frequency and parking demand etc would therefore be expected at the time of submission.

It is considered reasonable that a relatively detailed account of the likely future patronage be provided at future planning application stage with estimated use profiles/timing of the schedule of events and site management proposals that may be appropriate in order to minimise impacts on the local road network and residential community. This exercise should of course correlate with the available on-site parking facilities which clearly reduce on-street parking demand and should be managed accordingly.

Further developing the last point made, it is also recommended that given it is likely that multiple i.e. simultaneous extra-curricular/community events would occur, suggested remedies in the form of control management which may include reference to limiting (capping) any future multiple or overlapping activities that may cumulatively cause material detriment to the local road network by creating a recurring 'spike' in traffic generation and parking demand are required. Clearly, in an attempt to safeguard the local community and highway network from undue impacts, such peak events are to be avoided if at all possible. Although it is stated there is a Community Use Agreement (CUA) in place for a separate permission (2082/APP/2017/2086), this agreement does not pertain to the existing MUGAs which means a separate Community Use Agreement will be required to help safeguard activity impacts linked to this specific proposal.

It is anticipated there will be a reliance on the successful promotion of alternative sustainable means of travel to and from the site through the submission of a Travel Plan with any forthcoming planning application. The Travel Plan should be inclusive of appropriate 'modal-change' targets. This is required to help further mitigate/guard against any undue displacement impacts and excessive traffic generation on the local public highway.

Once submitted, the above information will allow for a better understanding of the level of activity generated by the current uses which can then be compared to any predicted increase in use intensity generated by the enhanced facility. This will be key to enable the Highway Authority to make an informed decision of the acceptability (or otherwise) of the proposal.

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal.

5. Other

ACCESSIBILITY AND INCLUSIVE DESIGN:

Policy D5 of the London Plan (2021) requires development proposals should achieve the highest standards of accessible and inclusive design. The Planning Statement accompanied with any forthcoming planning application should provide details in respect to: i. the existing disabled toilet and changing room facilities; ii. the number of disabled on-site car parking spaces; and iii. whether these facilities would be available to external club members/local residents using the MUGAs outside of school hours. These details are required to ensure that the proposal is acceptable to inclusive access considerations.

IMPACT ON TREES:

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires applications for proposals that would affect existing trees to provide an accurate tree survey. This is supported by Policy G7 of the London Plan (2021) which seeks to retain existing trees of value.

Northwood College is designated within a Conservation Area which gives protection to all the trees at the site. An Arboricultural Impact Assessment, Method Statement and Tree Protection Plan should be submitted with any forthcoming planning application. It will need to be demonstrated that the proposed floodlights would not cause harm to the health of trees at and adjoining the site. Careful consideration must also be given to the trees on adjoining land immediately to the north-west of MUGA 2 which are covered by Tree Preservation Orders 129 and 241.

IMPACT ON PROTECTED SPECIES:

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

Paragraph 99 of 'Biodiversity and Geological Conservation: Circular 06/2005' states that it is essential that the presence or otherwise of protected species that may be affected by a proposed development is established before planning permission is granted. The reason for this is to ensure that all relevant material considerations are addressed in making the decision.

Any forthcoming planning application must be accompanied by an ecology assessment to demonstrate that the floodlights would not cause harm to protected species, noting in particular the site's proximity to Northwood Golf Course and Northwood Cemetery which are designated Nature Conservation sites. The lighting impact assessment would also need to demonstrate that potential light spill would not adversely impact bats that could potentially be roosting in nearby trees.

FLOODING AND DRAINAGE:

Policies SI 12 of the London Plan (2021) requires developments proposals to ensure that flood risk is minimised. Policy SI 13 of the London Plan (2021) aims to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is reinforced by Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

The site is located in Flood Zone 1 where the risk of flooding from rivers or seas is low. As such, all forms of development, including outdoor uses, are acceptable in terms of fluvial and tidal flood risk in this location.

According to the Council's GIS, a watercourse and Thames Water outfalls cuts through the site from Rickmansworth Road and runs between MUGA 2 and the rearmost buildings. This associated area also falls within a Surface Water Zone. The proposal would not involve any increases to the ground footprint of the buildings and hard surfaces at the College. It is therefore considered that the proposal would not exacerbate the risk of surface water flooding at the site over and above the existing situation.

WASTE COLLECTION:

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals should make sufficient provision for well design internal and external storage space for general, recycling and organic waste, with suitable access for collection.

Given that the proposal seeks to intensify the use of the MUGAs, it would need to be demonstrated that bins are located within reasonable walking distances of these areas. The Planning Statement should also explain how refuse collections operate at the site, and confirm that any additional refuse surplus could be disposed off using the existing facilities.

6. Planning Obligation and CIL (Mayor and LBH)

PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies(2020) states that to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

The Council adopted its own Community Infrastructure Levy (CIL) on 1st August 2014. The Hillingdon CIL charge for residential developments is £95 per square metre of additional floorspace. This is in addition to the Mayoral CIL charge of £60 per square metre. CIL rates are index linked. The proposal would not be CIL liable.

A Community Use Agreement will need to be entered into by the applicant.

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

7. Application Submission

If an application were to be formally submitted, it would need to be supported by the following documentation:

Application Form

CIL Form

Location Plan (1:1250), Block Plan (1:500) and Proposed Site Plan (1:200)

Existing and Proposed floor plans and elevations

Arboricultural Impact Assessment, Method Statement and Tree Protection Plan

Preliminary Ecology Assessment (Bat emergence/Re-entry surveys, if required)

Planning Statement

Heritage Statement

Verified views and photomontages

Noise Impact Assessment

Floodlight Impact Assessment

Transport Statement

Travel Plan

Fee

Please note that this list is not exhaustive and other information may be required on the proposal program.

8. Conclusion

There are concerns that the proposal would adversely affect the character and appearance of the area and the surrounding Conservation Area, the residential amenity of neighbouring properties adjacent to the site, highway safety, protected trees and protected species. Whilst the benefits the proposal would afford to the school are noted, the issues raised in respect to the aforementioned planning considerations will need to be addressed.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

Nesha Burnham
Principal Planning Officer
Major Applications Team
London Borough of Hillingdon

Planning Guarantee

For complex applications which are likely to exceed the statutory time frames, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all planning performance agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.

Appendix B Follow up pre-application advice from Hillingdon dated 15th August 2022

Dear Georgia [REDACTED]

Thank you for the letter from Nexus Planning dated 29.06.2022, in which you set out a number of points in connection with pre-application 2082/PRC/2021/279. I sincerely apologise for the delay in responding to the letter [REDACTED]

Having reviewed our formal pre-application response in light of the comments from Nexus Planning, I stand by our original response as set out in the officer report dated 01.06.2022. I would add that I strongly disagree with the assertion that our conclusions were informed by 'inaccuracies or misunderstandings on some key areas'. [REDACTED]

To clarify, there is not an in principle objection to the proposal and on the contrary, the potential benefits of enhancing the facilities are duly noted. However, there are a number of potentially overriding constraints and impacts as explained in detail in our report. It will be for the applicant to respond in any forthcoming formal planning application with appropriately detailed technical information and suitable mitigation. At this stage, in the absence of such information, I cannot be confident that the issues we have highlighted can be satisfactorily addressed, particularly in respect of MUGA 2 [REDACTED]

With respect to Nexus' comments regarding the Community Use Agreement (page 2 of the letter), I can confirm that in compiling our formal response to the pre-application, the planning history pertaining to the site was carefully reviewed and understood. I note that condition 6 of planning permission 2082/APP/2017/2086 was not expressly replicated on the decision notice for application 2082/APP/2019/3720 and in any event, it is a temporary consent. Notwithstanding, I have clarified our view in respect of the principle of development above [REDACTED]

Turning to Nexus' comments on the various technical matters, I stand by our advice (in the officer report dated 01.06.2022) regarding the assessments/reports which will be required for a formal planning application. I can clarify that the Lighting Report by Halliday Lighting was considered by officers in reaching our conclusions on the pre-application proposal. This brief Lighting Report makes no reference to relevant planning policies and does not give adequate comfort in relation to the impacts of the proposed lighting. I would also question the categorisation of the site as 'Urban' and note that the report does not provide any detailed justification in respect of this. The site lies within a predominantly residential area, in proximity to large unlit open areas (including woodland/golf course), therefore it is considered to be sensitive to lighting proposals. A more detailed and fully comprehensive lighting assessment and mitigation strategy should be submitted with any forthcoming formal planning application [REDACTED]

I hope that this response is helpful and clarifies the position for you [REDACTED]

Kind regards [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]