

How I learnt of the Consultation:

[REDACTED]

On the 21st August I received an anonymous leaflet, the purpose of which was to make me aware of a Proposed Main Road along the route of the Railway Embankment. This was a great shock to me as I knew nothing about the PDO consultation. My surprise was heightened when I realised that we were already in the middle of the consultation period which had started on the 18th July, and was due to end on the 12th September.

The next day I found out that a resident from Thelwall had set up a Facebook Group on the 19th of August to make people aware of the Consultation. Her group now has 4,000 members and she has raised funds that have enabled her to print 10,000 leaflets which have been delivered to local residents.

As the PDO is a very important document, **I believe that WBC should have contacted residents directly to notify them about the consultation. Surely we had a right to know and we should not have been left to find out about the PDO consultation ourselves.**

I was also surprised to find out that WBC has the aim of Warrington becoming a City and not to remain as a Town. **I believe that residents should also have been asked if they want to stay as a Town or to become a City.**

I joined the Facebook group and have tried to make comments on their web page not out of anger, but in a reasoned way. This is despite the fact that if a roadway were to go ahead there is a strong chance my [REDACTED] would have to be demolished. I was therefore upset by a member of WBC who went on to Facebook and in his post he accused the group of deliberately "scaremongering the residents" by having posted the map that is shown on page 41 of the PDO.

I agree with a leaflet distributed on the 28th August by the Grappenhall and Thelwall Parish Council where they say they were critical of the timing of the consultation. I also strongly agree with their statement that: **"A severe lack of publicity by the Borough Council has left many residents with little or no information relating to the consultation"**

I attended a recent meeting at the Quays Community Centre, Grappenhall. It had been organised by the local Facebook group with the aim of forming a more official committee. Most of the concerns that night were about the possible use of the railway embankment as a Strategic High Level Roadway crossing of the Manchester Ship Canal. The map on page 41 of the PDO does not make it clear that this follows part of the Trans Pennine Trail. Several representatives of the local Parish Councils were present. I feel they did their best to clarify the fact that the strategic road is just a potential route and is not at the planning stage. They honestly answered the many concerns of residents and they stressed how important it was that as many residents as possible reply to the PDO consultation.

I also attended the consultation event at the Park Royal Hotel. The representatives of WBC were there to discuss the displays that were on display. I spoke to [REDACTED] the Planning Policy Manager, who stressed that a strategic High Level Route was not at the planning stage. He went on to say that it would not be the only route under consideration if a high level route was agreed.

He did say that in retrospect it may have been better not to have shown the dotted line on the map. I pointed out that even if it was removed from the final PDO, people would still know it was a possible consideration for the future. [REDACTED] could therefore be very difficult to sell or possibly have to be sold at a very reduced price. He said WBC might not know if a bridge was needed for 10 to 15 years, but was unable to rule it out from being an option.

My Response to the PDO.

Question 1: Do you have any comments to make about how we have worked out the need for new homes and employment land in Warrington over the next 20 years?

YES: When I started looking at the PDO I was very surprised to see on page 5, section 2.1 that an earlier consultation had been held at the end of 2016 on the “scope and content of the Local Plan”.

I strongly believe that this earlier consultation was fundamentally flawed because it had not been widely known. I believe this is born out in section 2.2 as WBC only received 78 responses - lack of publicity again!

I strongly believe that with more publicity WBC would have had a lot more responses. There is even the possibility that as a result of more response WBC may have needed to make some changes to the PDO consultation. Even a small adjustment in your plans for growth would make a big difference over a 20 year period.

In section 2.3 the WBC say that they had to update their Strategic Housing Market Assessment (SHMA) to take account of recent projections, but don't disclose what the results of those projections were, or in what way they had to update their SHMA.

In 2.4 WBC states that the majority of consultation comments did not necessitate any amendments to the SHMA and therefore did not impact upon the housing needs. As I mention above I believe the consultation was flawed and question the validity of the decision not to make any amendments.

Question 2: Do you have any comments to make about how we have worked out the number of homes and the amount of employment land that can be accommodated within Warrington's existing built up areas?

YES: In section 2.8 WBC does not explain the reasons why the Objectively Assessed Need (OAN) for housing had to rise, only that it was the result of an economic activity rate forecast. The council state that the figure needed to change from 839 to 955 without explaining where the starting figure of 839 comes from.

In section 2.9 WBC did not explain why an additional rise was needed to meet an increase in housing due to job growth, or why was this not already included as part of section 2.8. WBC said that the housing rate had to rise from 984 to 1,113, but they do not explain where the starting figure of 984 comes from. Is it possible that 984 should in fact be 955 as is section 2.8?

In section 2.11 WBC state that the Economic Development Needs Assessment (EDNA) had been criticised by some representors without giving any indication about what those criticisms were or why they did not need to act upon them.

In section 2.17 WBC say that past trends is not a robust way to forecast jobs growth. WBC predict that growth will slow down, but only at the end of the 20 year development period. I don't believe that this is a sound assumption to make for a town that is currently already at, or nearly at, capacity. I believe that growth could slow down earlier.

In section 2.19 WBC stated that, “**other representations from residents and other stakeholder organisations considered that the level of growth proposed by the council was too high and this was resulting in excessive land requirements for future developments**”. WBC have not explained if they needed to make any adjustments to the level of growth, and if they did not, why not? I believe that a fairer consultation may well have had more responders who thought that the growth predictions were too high, and therefore not sustainable over 20 years.

In Section 2.32 WBC claimed that there was general support from the consultation responses for the proposed scope of the Plan Review. Why did the council not question why they had so few responses?

Looking back to section 2.13 about their employment land needs, WBC said that there was a further need for 381ha without explaining why that was.

Question 3: Have we appropriately worked out the amount of land to be released from the greenbelt, including the amount of land to be “safeguarded”?

NO: In section 3.1 WBC invited Developers, Local Community and other Stakeholders to submit sites that they wanted to be considered in the plan. In section 3.2 a table shows the number of the ‘Call For Sites’, by use, location and size. From this table it shows that requests for a total of 2,427.27ha of land had been submitted. Surely “Alarm Bells” should have started to ring when the council saw that only 75.9ha or 3.2% was for “Urban” land, while the remaining 96.8% was for Green Belt Land.

In section 3.3 WBC state: “**The vast majority of sites are located in the Green Belt. Of these, the predominate use being promoted is residential, although there are significant employment and mixed use proposal sites**”.

WBC have made no comments about the % of Green Belt Land being too high, so are all of these ‘Call for Sites’ still up for consideration? I believe that the locations of these sites need to be made public. I am especially concerned that Moore Nature Reserve may be one such site and it must be preserved at all costs, it is so important.

In Section 3.6 WBC mention that Fiddlers Ferry may come forward for development during the period of the plan. However as its future is uncertain, I agree that it cannot be used in the PDO. I believe one option could be to hold back the building of a large number of houses and only for them to be built if Fiddlers Ferry or other Brown Field Land were to become available. Effectively this would then become part of your Safeguarded Requirements.

This would also fit in with government policy of Brown Field Land being used as a priority and would also mean less Green Belt Land being needed

Section 4.7 states that; “**The Council is therefore proposing a housing target of 1,113 homes per annum over the 20 year Plan period and an overall employment land target of 381 hectares.**” I do not believe that the council have shown that this level of growth is sustainable.

Safeguarding Requirements

I already believe that WBC plans for its housing needs in the PDO are far too high. Therefore it stands to reason that I also believe their planned Safeguarding Requirements (Section 4.20) for the next 10 years are too high and therefore are not sustainable.

In the WMC table in section 4.21 the number of houses per year is shown as being 955 (based on OAN). They say they would need to safeguard 8,595 over that period. They believe only 36%

of those will be required from Green Belt Land, which works out at 3,094 houses, which gives a potential population of 7,425 based on a persons per household ratio of 2.4 persons (2011 census).

In section 5.37 WBC propose to locate the Safeguarded Land for these additional 3,094 houses adjacent to the Garden Suburb. Adding these 3,094 houses to the 6,000 houses in the Garden Suburb gives a total of 9,094 houses with a potential population of over 21,800.

I do not see how this large development, twice the size of Grappenhall and Thelwall cannot have a negative impact on neighbouring villages. The failing Infrastructure, especially the road network, could see the M6 & M56 motorways becoming gridlocked on a more regular basis.

I said in section 3.6 (which relates to Fiddlers Ferry Power Station), that I suggest that the council reduce the number of the 22,260 houses to be built and hold them back in reserve, effectively safeguarding the houses until Brown Field Land becomes available.

In section 4.19 WBC state that **“The Council is confident that exceptional circumstances can be demonstrated to justify this scale of Green Belt release”** and that the case for “exceptional circumstances” is set out in section 4 below. Is this possibly an error, and should it actually be referring to section 4.40 a further 4 pages on, where I found the title: **Exceptional circumstances for releasing greenbelt.**

In section 4.40 WBC put forward that **“The Plan will enable the creation of new sustainable communities but in a manner which will unlock strategic infrastructure to support the growth of Warrington as a whole, addressing existing issues of congestion, and unlocking major development sites with significant brownfield capacity”.**

However, I believe that WBC plans for the Green Belt in South Warrington are far too large and that they will fail in developing the aim of new sustainable communities. I further believe the effect of the scale of the Garden Suburb in SE Warrington will be to create an “Urban Sprawl” towards its neighbouring villages. These villages could lose their sense of belonging to their own distinct communities.

In 4.41 one of WBC arguments is that they need the Green Belt to fully meet their development needs. I do not believe that to be an exceptional circumstance.

In 4.42 there is another weak argument, that their status as a Key Driver in the NW would be threatened as they run out of employment land. I do not believe that to be an exceptional circumstance.

In 4.43 A further weak argument is that if WBC does not meet its development needs it will put pressure on other boroughs. I do not believe that to be an exceptional circumstance.

It is my understanding that plans need to be Design Driven:

- To produce buildings that will enhance the character of the communities around them
- To enhance the historical character of the area
- Not to detract from the beauty of the Green Belt around them
- Be outstanding or innovative
- To enhance significantly the immediate setting
- Be sensitive to the defining character of the local area
- To help raise standards of design or of the highest standard of architecture

I do not believe that the WBC plans show any evidence of these design driven objectives. They do refer to some of these objectives in section 4.38

Question 4: Do you agree with the new local plan objectives?

- W1. I do not agree with the WBC objective for the transition of Warrington from a New Town to a New City. However I do agree with the following aims: The regeneration of Inner Warrington, the delivery of a strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst supporting Warrington's ongoing economic success
- W1. I do not agree with delivering a minimum of 22,260 new homes because I believe that your plans for the Garden Suburb are over ambitious
- W2. I agree with the objectives of W2 but I believe WBC could fail to achieve them by their over ambitious plans for housing
- W3. I agree with the objectives of W3
- W4. I agree with the objectives of W4 but the emphasis must be on reducing congestion rather than to achieve growth. If they fail to ease the congestion then the growth will stall
- W5. I agree with the objectives of W5
- W6. I agree with the objectives of W6 but I have concerns that the scale of the Garden Suburb plans may in fact damage the environment

Question 5: Do you have any comments to make about how we have assessed different "Spatial Options" for Warrington's future development?

YES: In general I tend to agree with WBC choice of Spatial Option as being option No.2. I also do agree that some small growth in outlying settlements could help in sustaining local services, especially public transport links to Warrington.

However, I believe that the amount of Greenbelt Land WBC plan to release in South East Warrington will have a negative impact on the neighbouring villages. I believe that the new Garden Suburb would start to sprawl and eventually merge with its neighbours rather than be a separate suburb with linking paths and byways.

Question 6: Do you have any comments to make about how we have assessed different options for the main development locations?

YES: Firstly, I believe that WBC chose to ignore George Osbourne's original concept for a Garden Suburb in which he envisaged that they would be anything from a few hundred new houses up to 5,000. Instead, the council chose to use a much larger model based on 8,000 new houses.

If WBC had, for example, chosen to build 4,000 houses rather than 8,000, then you could still have looked at the same 5 options but each would have smaller numbers of new houses.

Question 7: Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

NO: In question 6 above I said that I believe all of the council's options were too high as they were based on building 8,000 new houses.

That means that I also believe that the preferred option location No.2 for 6,000 houses in SE Warrington and 2,000 in SW Warrington is too high and not sustainable.

Option 4, with its smaller garden suburb, would have needed less infrastructure and WBC also recognised that it would have had a lower transport impact. However I still believe 6,000 houses are too many, especially considering WBC plans for an additional 3,094 new houses to be built adjacent to the new Garden Suburb as part of their safeguard requirements.

With regards the Employment Land Locations, I am concerned about the increase in heavy transport vehicles and the impact they will have on the roads to and from the heavily congested M6 and M56 motorways.

Question 8 Do you have any comments to make about our preferred Development Option for the City Centre?

YES. In Section 5.2 the council say that Warrington is experiencing congestion which is having a detrimental impact on residents and businesses. They then state that: **“Through the options assessment work it is apparent that Warrington's roads, schools, health facilities and other community facilities are either already at capacity or will be once development sites within the urban area are built out”**.

Warrington's biggest problem is its' failing Infrastructure of roads and bridges, many of which have reached their capacity and cannot cope with heavy traffic, never mind the increased traffic from an additional 22,260 new houses.

Warrington is well served by its location close to the M6, M56 and M62 motorways which allowed it to have easy and reliable access out of the town in all 4 directions. However these motorways are now so heavily congested they are no longer reliable routes. They have long tail backs especially at slip roads and where motorways cross one another. It may be that some of the motorways may be at a point where their capacity cannot be increased.

When the M6 Thelwall Viaduct has to close because of an accident or strong winds, then traffic diverted off the motorways can bring the town centre to a standstill. The A50 in particular suffers badly at such times. It is also being used on a regular basis by motorists trying to avoid hold ups on the motorways.

The Swing Bridge Crossings of the ship canal at Latchford, Stockton Heath and at Walton are old and cannot cope with traffic when it is very busy. The crossing of the A49 in particular has severe congestion at most times and it backs up into the town centre. By their age and design I believe they cannot be modified to take more traffic.

Traffic from all 3 swing bridges have to cross the river Mersey at Bridgefoot, another major spot for congestion as the bridge is unable to cope with the number of vehicles trying to get across.

The WBC plan for the Western Bypass will ease congestion crossing the Manchester Ship canal. However I think many people will still choose to use the old Swing Bridge Crossings. Also the Bridgefoot crossing will still be a problem, a new Mersey Bridge may help but may not ease all the traffic on its own.

When the new Runcorn Bridge is completed there will be people who travel to work via Runcorn who will change their route to come via Warrington to avoid paying tolls. These numbers could be significant, especially people from Penketh and Great Sankey areas where it may not be a large detour in terms of mileage.

The council may need to consider ways to reduce the traffic into Warrington such as :

- Improved and more reliable Public Transport
- To have a park and ride scheme
- To develop a safe network of Cycle Ways. The PDO does show that to be one of its objectives. The TPT old railway embankment would present an opportunity to be used as a traffic free link to both the Town Centre and to its new Garden Suburb. By doing this the council would remove many of the residents' fears over any possible use of the embankment for vehicles.

I can see no mention about how WBC are proposing to increase the capacity of Warrington's Hospital which, like many others, is having problems with:

- Bed blocking by elderly patients waiting for a place in a care facility
- Pressure on A&E by none urgent patients who are unable to be seen by a GP without a long wait

Housing considerations.

- There is a need for more affordable homes to help people get into the property market. The need for some higher density 1 and 2 bedroom properties, which may best be achieved with 1 and 2 bedroom apartment blocks
- There is a need to develop any empty properties within the Town, especially any on the main street
- I find it worrying that Marks and Spencer's has closed its town centre store. Are costs so high that it is driving business out of the town centre?
- Building the large numbers of houses and roads, as described in the PDO, is likely to bring thousands of extra cars in to the town every day. There is clear evidence that motor vehicles make a significant contribution to poorer air quality and congestion
- Air Pollution is recognised as a contributing factor in the onset of heart disease and cancer. It can lead to increased respiratory problems and put increased pressure on an already very busy hospital. It could result in increases in hospital admissions and visits to Emergency Departments
- Bad air quality affects everyone and it has a disproportionate impact on the young and old, the sick and the poor
- WBC Air Quality Annual Status Report 2016 show that in 2014 out of the 47 places in town it tested, air quality was 17% above their target of 40ug/m³. In 2015 this had risen to 60%. This is a very worrying increase

- The World Health Organisation (WHO) named Warrington as the second worst city in the North West for breaching safe levels of air pollution. According to the report, only 11 out of 51 cities meet their guideline limit for dangerous particulates
- Warrington already has a heavy reliance on cars and other polluting vehicles. Should the plans be approved air quality may worsen.

Question 9: Do you have any comments to make about our preferred Development Option for the Wider Urban Area?

YES: There is no breakdown on page 36 of how many houses will be built in each of the locations in the wider urban area, only the total number of 4,869 houses.

Question 10: Do you have any comments to make about our preferred Development Option for developing the Warrington waterfront ?

YES: I would object if it meant a loss of Moore Nature Reserve.

I am concerned about increased movement of ships up and down the canal causing the 3 swing bridges to close more often and cause even more congestion.

Question 11: Do you have any comments to make about our preferred Development Option for the Warrington Garden City Suburb?

YES: In question 6, I said I believe the number of houses that you plan to build in South Warrington is far too high

The plan for 6,000 houses in the SE relates to a population of around 14,400 based on an average number of persons per household of 2.4 (2011 Census). This would be much larger than Grappenhall and Thelwall who between them had a population of under 10,000 in 2013.

As a result of the fact that the Garden Suburb is so much larger than Grappenhall and Thelwall, I believe there is the danger that it will finish up with an urban sprawl that sees it merging in time into its neighbouring villages. One of the aims of the Green Belt is to “**Avoid Urban Sprawl**”.

I think the council will struggle to develop a Sustainable Infrastructure of roads, especially being so close to the M56 and the M6 both of which already are severely congested.

I believe the council need to concentrate on improving the existing infrastructure, build a smaller number of houses on Green Belt Land, perhaps more on the scale that the plan has for the South West Extension.

On page 40 section 5.32 WBC state that: “**There is a significant requirement for infrastructure to support this level of growth, including a network of new distributor roads, a new secondary school, up to 4 new primary schools, a major new park, district centre, health facilities and leisure facilities. To achieve the full development potential of the area may require a further high level connection over the ship canal**”.

The thing that has probably angered residents the most is your map on page 41 of the PDO that shows a Potential Strategic road/public transport route, following the line of the Old Railway Embankment which now forms part of the Trans Pennine Trail.

I am against any plans to use the Old Railway Embankment as a roadway, especially if it had to be widened or even removed to be replaced by a concrete structure.

At the Park Royal meeting at Stretton I was told by [REDACTED] not to worry, as the council have no current plans for a Strategic Road although it may be considered in the future. He also said that the dotted line on the map was only to illustrate one of their possible options for a Strategic Road.

However in the council's "Warrington Means Business Master Plan", there are 4 similar maps that show a route marked that follows the old Railway Embankment. However they show the route as far as the old High Level Bridge. Each has a different type of use, one for a roadway, one for public transport, one for a link for HS2 and one for a Cycle Pedestrian route. This paints a slightly different picture, as it shows the road was being given a wider consideration, not just in the PDO.

If you were to use the old Railway Embankment as a traffic free cycle, pedestrian way to the North of the canal and beyond, then I feel many people would have no objections.

However I would object to the Railway Embankment being used for any other use in the future.

Some of my Personal Reasons for objecting to the use of the Embankment for a roadway are:

- I am concerned about an increase in the noise that a High Level Roadway that was built at or above the level of the bedroom windows of many of the houses. [REDACTED] This noise would be especially bad when large waggons and buses rush past
- I imagine that vibration from heavy vehicles would at least make windows and doors shake, if not the building itself
- Street lighting so close to my apartment
- The exhaust fumes from heavy goods vehicles and buses, especially when the viaduct is closed, and other traffic becomes gridlocked, would mean I would have to keep my windows closed to ensure the fumes did not enter the property
- There would be a complete loss of privacy [REDACTED] This would be especially upsetting at times when traffic was stationary in a traffic jam
- The views [REDACTED] would be not be as pleasant as those at present where I look out onto lots of greenery
- The value of my property could be dramatically reduced [REDACTED] Especially if the embankment had to be reinforced with unsightly concrete supports. I am not sure that I would be compensated to the full loss in the value of my property. I would guess in my case this could be a considerable amount.

Environmental Reasons for not using the Railway Embankment:

- The loss of a stretch of the Trans Pennine Trail (TPT) that is currently traffic free. If this important section were lost it would result in an even longer section of the trail being along main roads. This would not be a safe section for children on bicycles
- It is a rather splendid and beautiful section of the Trail bounded as it is by mature mixed woodland which is full of wildlife. Many of the trees, or possibly all, would have to be removed, especially if the embankment had to be widened to build a roadway

- It would lead to a loss of sites for a variety of nesting birds including a Carrion Crow, several Wood Pigeons and a Jay that nest in the trees outside my bedroom window. A wide range of wild birds visit my bird feeders and I've seen several species of Warblers. I have also heard Little Owl and Tawny Owl several times this year and a Buzzard is seen regularly. On one occasion last year I watched a Buzzard chase a Goshawk from a large Pine tree on the embankment. I have seen signs of Badgers where they have been grubbing for food along the paths on the trail. I am not so keen on the 3 Grey Squirrels that raid my bird feeders on a regular basis!
- This section of the Pennine Trail is very popular with the locals and visitors from further afield, and it is a very safe off road Cycle Way that is used by many families with small children as well as more serious cyclists
- The Trail is regularly used by walkers, several of whom appear with their Pennine Trail Maps. I have noticed that a couple of times this year a small gazebo has been erected by the entrance to the trail, with groups of people meeting for what I believe to be fun runs
- The Trail is used by joggers

An advantageous use of the Railway Embankment:

Part of the PDO includes building a large number of residential houses in the S.E. Warrington Garden City Suburb, along with infrastructure to support them. It states the need for a network of footpaths and cycle ways to link different areas together. A greener way to use the Railway Embankment would be to leave it as a traffic free route, and have a cycle route linking it to the New Developments with another linking it to the North of the Ship Canal and then into the Town Centre.

If a high level bridge was needed in the future I would object if it were to have an impact on Woolston Eyes which is an SSSI site. Woolston Eyes is important for Breeding Warblers, overwintering Duck, and especially breeding Black Necked Grebes. Woolston Eyes is also an important site for Great Crested Newts.

Question 12: Do you have any comments to make about our preferred Development Option for the South Western Urban Extension?

YES: The scale of the SW Extension seems more reasonable to me than the scale of the SE extension with its 6,000 new houses.

Section 5.42 mentions the importance of extensive open spaces for recreational purposes. The yellow dotted line in figure 8A looks to me that it runs along the edge of Moore Nature Reserve. Moore would provide one of the safe open places as it is already open to the public. It is used by many Birdwatchers, families out for a walk and it is a regular route for dog walkers. I have heard that it is under threat as it is one of the "Call for Sites". I feel that it must be protected at all costs.

Moore is a very important site for birds, especially its overwintering Bitterns, it also has the very scarce Lesser Spotted Woodpeckers, and large numbers of breeding Warblers. It has had many sightings of rare birds over the years, the records of which can be found on the "Record" web site.

<http://www.recordlrc.co.uk/c2.aspx?Mod=Article&ArticleID=38>

Question 13: Do you have any comments to make about our preferred Development Option for the outlying Settlements?

I am neither for or against it.

Question 14: Do you agree with our approach to providing new employment land?

I am neither for or against it.

Question 15: Do you agree with our suggested approach for dealing with Gypsy and travellers and Travelling Show People Sites?

I am neither for or against it.

Question 16: Do you agree with our suggested approach for dealing with minerals and waste?

YES: The council does not say if its present facilities for controlling the waste are at, or nearing capacity. In section 4.36 they say they are looking into any possible capacity gap. Cross boundary waste movement will surely be more expensive than if done within boundaries.

I am concerned that the council will not be able to cope with the additional waste produced by such large growth plans and will be forced to use cross boundary waste movement.

Question 17: Having read the Preferred Development Option is there anything else you feel we should include within the local plan?

YES: I feel you need to address the outcry caused by the way you included a proposed Strategic roadway along the Old Railway Embankment.

If you decide to leave the dotted route off the map at the end of the consultation, I believe you need to explain the reason why in the Local Plan.

It is now widely known among residents that that the Old Railway Embankment is being considered as a possible route, and this has already had an impact upon the ability to sell your property if you live very close to the embankment.

The residents need to be informed at the earliest possible moment if WBC come to a point where a decision is taken to rule the Railway Embankment out as an option for development.

This is the response from:

[REDACTED]

[REDACTED]

[REDACTED]