

Development Management  
Regeneration and Planning  
London Borough of Camden  
5 Pancras Square  
London NC1 4AG  
FAO: Josleen Chug

Job Ref: 7856  
Email: [iblacke@jrp.co.uk](mailto:iblacke@jrp.co.uk)

9 October 2015

Dear Sir or Madam

**Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011:  
Request for Screening Opinion pursuant to Regulation 5  
Development Proposal – no. 156 West End Lane, West Hampstead, NW6**

We write on behalf of our client, A2Dominion Development Limited ("A2Dominion"), to formally request the adoption of a Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011, in relation to the proposed development at no. 156 West End Lane, West Hampstead, NW6 1SD.

A2Dominion's proposals for the site are currently the subject of pre-application consultation with a range of stakeholders including the London Borough of Camden ('the Council'). A planning application is expected to be shortly submitted to the Council and will be accompanied by a suite of supporting documents including, but not limited to, a Design and Access Statement, Transport Assessment, Energy and Sustainability Statement, Noise Impact Assessment, Air Quality Assessment, Ground Conditions and Contamination Desktop Study, Flood Risk Assessment, Economic Impact Assessment, Preliminary Ecological Appraisal, Historical Environment Assessment and a Planning Statement.

The proposed development comprises the demolition of the existing buildings on the site (a vacant office building and a builders' merchant and yard including a retail showroom element fronting West End Lane) and car parking and its comprehensive redevelopment through the erection of up to 170 residential units (Use Class C3), new floorspace for town centre use (Use Class A1, A2, A3, D1 or D2), community meeting room and employment floorspace (including both flexible office floorspace and dedicated floorspace for start-up businesses), together with new landscaping, on-site access, servicing, and disabled car parking.

It is our view that the site and proposals do not constitute an Environmental Impact Assessment development for which an Environmental Statement would be required.

In accordance with Regulation 5(2) this letter includes:

- A plan sufficient to identify the proposed site (refer to Appendix 1).
- A description of the existing site and its setting; and
- A description of the nature and purpose of the development and its possible effects on the environment.

## The site and surrounding area

The site, which is approximately rectangular in shape and extends to approximately 0.63ha, is located on the eastern side of West End Lane in West Hampstead, London, NW6. West End Lane itself forms the western boundary of the site, with the Thameslink railway line to the south, the rear gardens of residential properties to the north and a Multi-Use Games Area to the east. West Hampstead is, in this location, characterised by a range of uses including shops, leisure, employment and housing.

The frontage of the site facing West End Lane is currently occupied by the retail showroom element of a builders' merchant at ground floor level with five floors of (vacant) offices above. The builders' merchant's open storage yard occupies the remainder of the site. Access to site is from West End Lane.

The site is not located within a conservation area, with the West End Green Conservation Area located adjacent to the north of the site. The site is located within an "Area of Intensification" as identified in the Mayor of London's adopted London Plan (2015) and a "Growth Area", as identified in the London Borough of Camden's adopted Core Strategy (2010).

## Determining whether an Environmental Impact Assessment is required

Within the Environmental Impact Regulations, the determination of whether an Environmental Impact Assessment ("EIA") is required is established by a series of assessments of the nature of the proposal and its potential impacts.

There are two schedules of development types: Schedule 1, for which EIA is required in all cases; and Schedule 2, for which EIA is necessary only if the development is likely to have significant environmental effects (as referenced in Schedule 3 of the Regulations).

The proposed development does not meet any of the categories of development identified in Schedule 1 of the Regulations. It could, however, be considered to fall within one of the categories of development set out in Schedule 2 of the Regulations, specifically Category 10b "urban development project". As a consequence, the Regulations require a further series of assessments to be undertaken to identify whether formal screening is required to identify whether the development is likely to have *significant environmental effects*:

(1) *Is the site located within, or partly within, a "sensitive area" as defined by the Regulations?*

The DCLG Planning Practice Guidance: Environmental Impact Assessment (March 2014) specifies that if Schedule 2 proposals are located in, or partly in, a "sensitive area" they should be screened to assess whether the development is likely to have significant environmental effects. Sensitive areas are defined as any of the following:

- Sites of Special Scientific Interest;
- Land to which Nature Conservation Orders apply;
- International conservation sites;
- National Parks;
- Areas of Outstanding Natural Beauty;
- World Heritage Sites;

- **Scheduled Monuments.**

The site is not located within or close to a “sensitive area”. Notwithstanding this, a simple consideration of high level sensitivity is not a robust assessment of the potential effects which could arise from any development. The potential impacts of the proposal have therefore been considered in more detail in relation to the relevant thresholds and criteria of Schedule 2 of the Regulations.

(2) *Does the site or proposed development exceed the defined thresholds in Schedule 2?*

Amendments to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (‘EIA Regulations’) introduced in May 2015 raised the threshold for minimum size of site at which “urban development projects” require screening in order to determine whether environmental impact assessment will be necessary to 5ha. Projects’ of more than 150 dwellings, nevertheless, require screening even if the proposed development falls below the 5ha area threshold.

Whilst the site is below the 5ha threshold, the development proposals are for more than 150 dwellings and, therefore, consideration needs to be given to the potential significance of any environmental effects. Schedule 3 of the Regulations set out the screening criteria in relation to Schedule 2 type developments, drawing attention to the complexity of impacts resulting from the scheme as well as a range of issues relating to the sensitivity of the site. To consider the potential for *significant* environmental effects in more detail, the applicant has utilised the selection criteria provided in Schedule 3 of the Regulations and the results of the assessments already undertaken by its consultant team, as set out below.

(3) *Schedule 3 Selection Criteria*

The selection criteria set out in Schedule 3 of the Regulations are set out under three broad headings:

- *Characteristics of the development.*
- *Location of development.*
- *Characteristics of the potential impact.*

These criteria have been used to appraise the proposed development to identify the potential for significant environmental effects.

(4) *Development Appraisal considering Schedule 3 criteria*

(A) *Characteristics of the development*

**A.1 Size of the development**

The site is approximately 0.63 hectares (1.55 acres) in size. The proposed scheme would be contained within the site boundary as shown in the Site Location Plan in Appendix 1. The existing floorspace is approximately 4,019m<sup>2</sup> GIA and the proposed floorspace is approximately 15,522m<sup>2</sup> GIA.

The scale and density of the proposed buildings will be greater than that which currently exists, and the potential of the site and area to accommodate greater intensity of development is recognised through its designation as an “Area of Intensification” and “Growth Area”. The aggregate number of additional residential units and aggregate quantum of additional commercial floorspace to be delivered as a result

of these latest proposals will still remain substantially less than the identified capacity of the Area of Intensification and Growth Area.

Additional physical and social infrastructure considered necessary to be provided in association with the proposals would be delivered through the mechanism of Community Infrastructure Levy which, linked to the Mayor of London's and Council's Infrastructure Plans and the designation of an Area of Intensification and Growth Area, anticipated the current and future requirements for the area to ensure that there were no unmet requirements.

It is therefore considered that the scale and nature of the proposed development would not result in significant environmental effects.

### A.2 Potential cumulative impact

The site is located within an "Area of Intensification" and a designated "Growth Area", and a number of major schemes have been granted planning permission. Housing-led schemes approved in the past five years in the vicinity of the site include nos. 187-199 West End (2011/6129/P) for 198 residential units including retail and employment floorspace; nos. 1-33 Liddell Road (Phase 2) (2014/7651/P) for 106 residential units and commercial floorspace; no. 163 Iverson Road (2012/0099/P) for 36 residential units; nos. 65 and 67 Maygrove Road (2012/5934/P) for 91 residential units, and no. 59 Maygrove Road (2009/4598/P) for 29 residential units. The aggregate number of additional residential units and aggregate quantum of additional commercial floorspace delivered as a result of these approvals remains substantially less than the identified capacity of the Area of Intensification and Growth Area.

A number of these proposals were subject to formal requests for a Screening Opinion, and the screening included an assessment of potential cumulative assessment by the London Borough of Camden. In each case it was concluded that EIA was not required.

The aggregate number of additional residential units and aggregate quantum of additional commercial floorspace to be delivered as a result of these latest proposals will still remain substantially less than the identified capacity of the Area of Intensification and Growth Area.

It is, nevertheless, considered that some cumulative effects could arise from the construction phase of the proposed development if this coincided with the construction phase of other approved schemes, particularly with regard to construction transportation, air quality, noise and vibration. These effects will, however, be temporary and it is expected that, as is typical with good practice, Construction Management Plans will be agreed with the Council and implemented to control and manage potential cumulative impacts of such. As such it is not considered that any cumulative effects would be "significant".

With regard to potential cumulative impact once the development is complete and occupied, it is considered that the scale and nature of the proposed residential development and proposed/approved developments in the area would not result in significant cumulative environmental effects.

### A.3 The use of natural resources

The development will not result in a significant use of natural resources. To ensure the use of high standard of materials, the BRE's Green Guide to Specification will be used to inform the selection of materials and preference will be made for materials and components with a high overall summary rating where possible.

The proposed new buildings will achieve sustainable design standards and will be an improvement on the existing building in relation to environmental effects. In addition an "Energy and Sustainability Statement" will be prepared and submitted with the planning application detailing the measures to be introduced.

#### A.4 Production of waste

Demolition of the existing buildings on site and construction of the proposed development will unavoidably produce a proportion of waste. Careful consideration will be given to the minimisation of waste during the construction phase of the project and within the lifecycle of the proposed development. Any opportunities to re-use and/or re-cycle demolition materials will be identified and pursued, where feasible.

In addition a Site Waste Management Plan will be prepared for the construction phase of the development which will provide guidance on the sustainable approach to waste management. The Site Waste Management Plan will provide guidance which will facilitate in achieving the goal of diverting the majority of the construction waste from landfill.

#### A.5 Pollution and nuisances

The demolition of the existing building and construction of the proposal will inevitably result in some waste materials and the potential for dust, noise and traffic effects for residents and businesses within the local area. The potential for these, together with mitigation and management measures to minimise their impact, will be addressed through appropriate demolition, waste and construction management measures which are commonly employed within urban settings such as this. A Construction Management Plan will be implemented during the demolition and construction phase to ensure best practice to minimise disturbances including noise, vibration, dust and smoke associated with works from the site.

In addition, a requirement of the award of both the demolition and construction contracts will be membership of the Considerate Constructors Scheme or appropriately recognised alternative.

#### A.6 The risk of accidents

The applicant has appointed a Principal Designer and Health and Safety Advisor to ensure that risks within the construction phase of the project are minimised. The contractor will implement measures in accordance with Health and Safety legislation and follow requirements and best practice during the demolition and construction phases to minimise the risk of accidents that could impact on people or the environment.

Appropriate environmental control measures will also be put in place during demolition and construction to ensure that any significant effects from materials that may be present, which could cause harm to humans or the environment are prevented.

There are no anticipated significant risks of accidents during the operation of the development given the nature of the proposed land uses.

**As a result of the above, the character of the development is not considered likely to raise any significant effects sufficient to warrant an EIA.**

*(B) Location of development*

The site is not partly or wholly located within an area of environmental sensitivity as defined in the Regulations. The existing land, a vacant office with an operational builders' merchants and storage yard, has limited value in terms of natural resources and the environment, with the site being predominantly hard landscaped.

With regards to selection criteria 2c (viii) of Schedule 3 of the Regulations, the site is located adjacent to the West End Green Conservation Area and the adjacent Canterbury Mansions is "locally listed". The proposals are considered to have a positive impact on the setting of the Conservation Area and "locally listed" building, protecting and improving its character and appearance through the introduction of high quality design, introduction of landscaping and public amenity space and enhanced permeability.

It is considered that there will be no adverse impact to the landscapes of historical importance that could be considered a significant effect on the environment.

**As a result of the above, the location of the development is not considered likely to give rise to significant environmental effects sufficient to warrant an EIA.**

*(C) Characteristics of the potential impact*

The characteristics of the effects that could occur from the development are not considered to create any potential effects that would be uncommon for this type of proposal. The following areas have been considered and assessed for the purpose of evaluating the characteristics of the potential impacts with regard to magnitude, complexity, probability, duration, frequency and reversibility.

(C.1) Transport

The site is located in a highly accessible location, and has a Public Transport Accessibility Rating (PTAL) of 6a which is defined as 'excellent'. A detailed PTAL assessment will be provided with the Transport Assessment which will form part of the documentation that is submitted as part of the planning application.

The proposed development will not generate significant amount of traffic on the local highway network, as the residential aspect of the proposal will be predominantly a "car-free" development, with only disabled car parking spaces allocated on-site. There will be servicing vehicles associated with the retail and employment space and refuse vehicles associated with the new housing, but these are anticipated to be of a lower overall volume of vehicular movements that are associated with the current uses on site. The predicted transport volume will not have significant effects on the local highway network.

The Transport Assessment will be prepared in accordance with the Transport for London ("TfL") guidelines as set out in "Transport Assessment Best Practice (2000)" and a scoping report for the Transport Assessment has already been issued to the London Borough of Camden Highway Officer.

In addition, a Travel Plan will be prepared for the operational phase which will include specific measures to encourage the use of sustainable modes of transport.

(C.2) Noise and vibration

The site is located within an area characterised by a mix of uses. The southern boundary of the site is shared with a railway line and it is considered that the existing ambient noise environment will be substantially derived from train noise. In addition, West End Lane, forming the western boundary, is an artillery road and it is considered that background vehicular noise will be prominent on site. The rear gardens of residential properties form the northern boundary to the site, and will currently also be subject to noise and activity associated with the existing builders' merchant and storage yard.

The proposals are unlikely to give rise to significant noise and vibration as the end use will predominantly be new housing. There is likely to be noise and vibration generated from the construction and demolition process, which will come from a number of sources including construction vehicles and associated building works. The residents immediately to the north of the site will be sensitive receptors throughout the construction and demolition phases.

Procedures will be implemented to reduce the noise effects of the construction and demolition of the proposal. Procedures of reducing noise effects will include but will not be limited to site hoarding, restricted operational hours (which will be controlled by a planning condition if a planning permission is granted), and appropriate construction techniques. A Construction Management Plan will be prepared and implemented to ensure that best practice and procedures are followed with regard to reducing noise effects throughout the construction and demolition stage.

The proposal is a "car free" development, other than required parking spaces for disabled residents, and therefore it is considered that there will be no net increase in traffic over the existing levels of the current operation on site (builders' merchants). It is considered that the redevelopment of the site will not give rise to a significant vehicular noise impacts.

Plant noise will be mitigated to appropriate levels in accordance with relevant standards and will be controlled by a planning condition. Mitigation measures will be implemented to reduce any effect of plant noise to future receptors on site. A Noise Impact Assessment will be prepared and be submitted as part of the planning application documentation. This report will assess the current on-site noise measurements and make recommendations for mitigation where appropriate.

### (C.3) Air quality

The character of the uses across the site would change from an operational builders' merchant and open storage yard to predominantly housing and, as such, it is considered that there would not be a significant effect on the existing air quality.

The London Borough of Camden has declared the whole borough as an Air Quality Management Area (AQMA) for annual average nitrogen dioxide concentration and long-term and short-term particulate concentrations. It is considered that the proposed development would not have a significant effect on this designation.

The proposed development is predominantly "car-free", and therefore it is not considered that there will be significant effects on the local air quality relating to transport emissions.

The effects from the construction phases on air quality (dust control) are not considered to be significant, particularly as there will be effective controls in place agreed with the Council as set out and managed within the Construction Management Plan. An Air Quality Assessment, assessing the proposed development against National Air Quality Objectives, national, strategic and local planning policy, will be prepared and submitted as part of the planning application documentation.

#### (C.4) Ecology

A Preliminary Ecological Appraisal was conducted on 2 May 2015 by The Ecology Consultancy to establish ecological information and assess the potential for the site to support protected species. The assessment highlights any potential ecological constraints associated with the proposed development and provides recommendations for mitigation measures. The results of this appraisal have informed this screening assessment and are summarised below.

The site does not form part of any statutory site and no statutory sites are located within one kilometre of the site. The site is not subject to any non-statutory designations. There are twelve non-statutory designated Sites of Importance for Conservation located within a 1km radius of the site. The nearest non-statutory sites are the West Hampstead Rail sides, Medley Orchard and Westbere Copse, located on either side of the site approximately 100 metres east and west, which are sites of Borough Grade 1 Importance for Nature Conservation.

The existing site comprises a building and extensive hardstanding, with a very limited extent of habitat formed of introduced shrub, scattered scrub and overhanging scattered trees, and a limited ecological value. As a consequence, the existing site has low potential to support breeding birds (and mitigation measures will be formulated to address the potential presence of breeding birds), negligible potential to support bats and was unsuitable to support any other protected species.

Overall the site has limited ecological value and no significant effects are anticipated. The proposed development has incorporated a landscaping strategy to increase the soft landscaping to the site which may increase the ecological value of the site. The Preliminary Ecological Appraisal will be submitted as part of the planning application.

#### (C.5) Ground conditions and Contamination

A Phase 1 Desktop Study has been completed on 11 March 2015 by RSA Geotechnics Limited to assess the site's potential risk of contamination. The Desktop Study comprised the following:

- Site visit to understand the general conditions and evidence of hazardous substances;
- Review of Historical Ordnance Survey maps and data from a search of Public Registers from the Landmark Information Group Limited using Envirocheck;
- Review of information obtained from several organisations including the Environmental Agency, the Local Authority, British Geological Survey and Natural England.
- Geological and hydrogeological data and information regarding likely ground conditions is from the library archive records of RSA Geotechnics.

The British Geological Survey recorded that the site was underlain by London Clay Formation with no superficial geology recorded. The survey also implied that an area of 'Head Propensity' was located to the north of the site, indicating a possibility that Head Deposits are present beneath the site, overlying the London Clay Formation. It is anticipated that the London Clay to be in excess of 65 metres thick. The London Clay is listed as an 'Unproductive Strata' by the Environment Agency.

The Phase 1 Desktop Study and Risk assessment concluded that there is some potential on- and off-site sources of contamination, including the potential for made ground to underlie the site (albeit of a moderate and low risk). A Phase II intrusive ground investigation will be undertaken prior to the



commencement of development which will assess whether the site is contaminated and if necessary remediation measures will be agreed with the Local Authority and Environmental Agency.

#### (C.6) Socio-economic impacts

The area comprises a mix of uses, including housing (to the immediate north), active “High Street” shops and services (to the immediate west, and along the full length of West End Lane) and employment and services across the area. It is a highly accessible location by a variety of means of public transport (with a PTAL rating of 6a, “excellent”).

It is not proposed to retain the existing uses (a vacant office building and builders’ merchant, shop and open storage yard) within the proposal. The proposed development comprises up to 180 residential units and non-residential floorspace including retail and employment floorspace (including dedicated space for “start-up” businesses and flexible office space) and community meeting space. The proposed development is considered to enhance social inclusion of the area by providing an aesthetically attractive, well designed housing-led development in a highly sustainable location together with a range of other appropriate uses.

The new housing will provide a range of tenure and unit sizes, including housing for sale, for affordable rent and shared-ownership. As well as creating an inclusive, balanced and mixed residential community in its own right, it will enhance the balance of the wider community. The inclusion of a community meeting space within the proposed development further reinforces these benefits and social cohesion.

The non-residential uses are considered to positively contribute to the local economy, with the reinstatement of an active retail frontage on West End Lane, dedicated space for “start-up” local businesses and flexible office space (again targeted at local businesses).

A preliminary Economic Impact Assessment has been carried out by Turley, which assesses the impacts of the proposal on the local economy. The assessment concludes that the following economic benefits will be a result of the proposed development:

- In the construction phase of the proposed development 216 jobs (full-time equivalent) will be created with an economic output of approximately £8.4m GVA per annum.
- The proposed commercial floorspace will create approximately 70 jobs (full-time equivalent) and will contribute to an economic output of approximately £4.8m GVA per annum to the London economy, of which circa £1.3m per annum could contribute to the growth of the Camden economy.
- As a result of the uplift in local resident population there is the potential to capture circa £2.7m of household retail (convenience and comparison) expenditure, and £1.7m of leisure (goods and services) expenditure, every year locally from households living on the proposed development. This will help to boost the vitality and viability of local shops and businesses, and sustain essential local leisure and support services.

It is therefore concluded that the site would not require a socioeconomic EIA. Any potential increased demand for infrastructure will have been identified and assessed by the Mayor of London and London Borough of Camden as part of the designation of the area as an “Area of Intensification” and “Growth Area” and addressed through the Community Infrastructure Levy.

The proposed development would create a range of permanent and temporary job opportunities, as well as providing high quality new housing (with an affordable element) which will create a balanced

and inclusive residential community, whilst supporting the local and wider economy through spending power. It is therefore considered that the socio-economic effects deriving from the proposal will have a positive impact.

#### (C.7) Flood Risk

A Flood Risk Assessment has been undertaken in July 2015 by iesis Special Structures to assess the site's potential risk of flooding and the impact any changes to the site (including development) may have on the flood risk to adjacent areas. This Flood Risk Assessment, including a surface water management strategy, will be submitted as part of the planning application documentation.

A desk study has been undertaken as part of this Flood Risk Assessment, which included a review of the Environmental Agency flood risk map which indicates that the site is situated in the Environment Agency Thames Region and in an area of fluvial flooding extent. The flood map indicates that the site is located within Flood Zone 1, which is defined as land assessed as having less than 1 in 1000 annual probability of river or sea flooding in any one year and is identified as having a low probability of flooding and that all uses of land are appropriate in this zone.

Reference to the Environmental Agency Groundwater Protection Zone map shows that the site is not located within any groundwater protection zone classifications. Reference to the Environmental Agency Groundwater Aquifer maps show that the site is not located within any aquifer zones. The Flood Risk Assessment concluded the following:

- The site has a low risk of flooding from fluvial sources.
- The site has a low risk of flooding from overland flows.
- The site has a low risk of flooding from rising groundwater levels.
- The site has a low risk of flooding from by surcharging of the local sewage networks
- The site has a low risk of flooding from reservoirs, canals or other artificial sources.

It is therefore considered that the site and the proposed development will not have significant effects with regards to flood risk.

#### (C.8) Archaeological impacts

The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed buildings, or registered parks and gardens. The site does not lie within either a Conservation Area or an Archaeological Priority Area, though the southern end of the West End Green Conservation Area, and the West End Archaeological Priority Area, which cover the London village of West End Green, are located immediately to the north and west of the site.

A Historical Environment Assessment, which predominantly was a desk-based study, has been undertaken on the site in June 2015 by MOLA to assess the impact on buried heritage assets (archaeological remains). The assessment concludes the following:

- From the documentary evidence it is clear that the site was not used for anything other than farming until the early 20<sup>th</sup> Century when the first buildings were constructed, mainly on the western side of the site.

- There is moderate potential for post-medieval remains in the form of field boundaries, ditches and other related agricultural features and for footings of small early 20<sup>th</sup> century buildings of very low/negligible heritage significance.
- Given that the archaeological potential of the site is likely to be limited to remains of no more than very low/negligible significance, and the localised impact of the proposals, it is considered unlikely that the local authority would request further archaeological investigating in relation to the granting of planning permission.

The redevelopment proposals are therefore not expected to have significant effects on archaeology.

**As a result of the above, the characteristics of the potential impact is not considered likely to give rise to significant environmental effects sufficient to warrant an EIA.**

### Conclusions

The lack of sensitivity of the site in Environmental Impact Assessment terms and the nature of the proposed development indicates that any effects relating to the development are likely to be local to the site and temporary, and no “significant environmental effects” relating to transport, noise and vibration, air quality, ecology, contamination and pollutants, socio-economic, flood risk, archaeological or any other physical changes to the development site are likely to occur as a result of the development.

The conclusions made in this screening appraisal will be supported by the individual discipline-specific reports and additional material that will be submitted as part of the planning application documentation to the London Borough of Camden.

For the reasons set out in this screening appraisal letter, these effects are not considered to be *significant* or unusually complex. Any effects will be of a local importance and, as a result, these effects can be properly considered as part of the determination of planning application and do not warrant EIA. Having regard to the information set out within this screening appraisal letter, it is considered that the proposed development does not comprise Environmental Impact Assessment development and therefore an Environmental Statement should not be required within the supporting documentation of a planning application.

We kindly request the London Borough of Camden to adopt a Screening Opinion to confirm that an Environmental Statement is not required as part of the submission of a planning application for this proposal.

If you have any queries or require further information, please do not hesitate to contact Ian Blacker of this office.

Yours faithfully



Ian Blacker

Head of Planning

**John Rowan and Partners**

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## **APPENDIX 1: SITE LOCATION PLAN**

