

**THE HIGHLAND COUNCIL**

**NORTH PLANNING APPLICATIONS COMMITTEE –  
29 April 2014**

Agenda Item	6.5
Report No	PLN/036/14

**14/00418/FUL : Scrabster Harbour Trust  
Industrial Site, Scrabster Mains, Scrabster.**

**Report by Area Planning Manager**

**SUMMARY**

**Description :** Creation of serviced development plots to form an industry/business park (Use Classes 4, 5 and 6); with associated indicative plot layout, re-grading works, landscaping, formation of new access, installation of roads and SUDS

**Recommendation - GRANT**

**Ward :** 02 Thurso

**Development category :** Major Development

**Pre-determination hearing :** None

**Reason referred to Committee :** Major Development proposal.

**1. PROPOSED DEVELOPMENT**

- 1.1 The proposal seeks the creation of a new industrial/business park which will serve as an extension to the Scrabster Harbour industrial area; the harbour area has little room for further expansion and this proposal will facilitate a significant extension of flexible space. The site will provide serviced development plots to form an industry/business park (with flexibility for Use Classes 4, 5 and 6), the development of each of which will require a fresh planning application. The proposal will develop an indicative plot layout, with site re-grading works, boundary landscaping, installation of an internal road with plot access points and a full surface-water drainage/SUDS layout. The proposal will also create a new access road from the A9 (Scrabster-Thurso section), including a roundabout where it crosses the existing unclassified access road. The layout as shown indicates a highly intensive development of the site, with the potential for 11 separate plots, but these have the potential to be combined into larger plots to give more flexible use of the site.
- 1.2 Formal pre-application advice was not required for this site as there is a previous consent for a similar scheme. A Proposal of Application Notice (13/03422/PAN) was submitted on 10/09/2013. The applicant held a pre-application public consultation

event in the Scrabster Harbour Trust harbour offices on Thursday 21<sup>st</sup> and Saturday 23<sup>rd</sup> November 2013, which attracted 15 attendees. The consultation report includes three completed comment sheets from the event as well as a letter of support from Thurso Community Council; the comment sheets are generally positive but one notes an existing flood problem in the corner behind the farm cottages.

- 1.3 The site is currently accessed via an un-classified road which runs along the eastern boundary, and by a farm-track which runs along the southern boundary; both of these have drainage ditches between the road and the boundary wall. There are no other infrastructure or (known) services on the site; a high-voltage overhead power-line runs along the north, west and southern edges.
- 1.4 Supporting documents submitted: Landscape Strategy; Pre-Application Consultation Report; Planning Supporting Statement.
- 1.5 A Planning Processing Agreement is also in place between The Council and the Applicant.
- 1.6 **Variations:** The landscaping design was amended during the course of the application to create an enhanced landscape buffer to the western edge of the site, to match that already proposed on the southern boundary. Additional information was also provided by the applicant for SEPA, to counter their initial objections (on the lack of clear information).

## **2. SITE DESCRIPTION**

- 2.1 The site is currently open farmland (grazing), surrounded by other fields, with a farm steading to the NE (Scrabster Mains, which also incorporates business units and a house) and a row of farm cottages to the SE corner. Apart from these two building groups, the site is surrounded by other agricultural fields, and is bounded by dry-stone walls. The site is sloping-up to the west, with an area of 14.4ha.

## **3. PLANNING HISTORY**

- 3.1 Previous planning application 06/00528/FULCA was granted on 19/09/2008 for the installation of roads, site services and drainage (but no specific uses), subject to conditions. This current application is much more detailed (in terms of plots, access, drainage and landscaping) and has specific uses (classes 4, 5 and 6) and introduces the new access road.
- 3.2 13/03422/PAN was submitted on 10.09.2013.

## **4. PUBLIC PARTICIPATION**

- 4.1 Advertised : John O'Groats Journal (Unknown neighbour) 14.02.2014  
Representation deadline : 28.02.2014  
Timeous representations : 0  
Late representations : 0

4.2 Public Consultation Event: Material considerations raised are summarised as follows:

- The issue of existing flooding in the corner behind the farm cottages (this should be avoided by the re-grading of the site and the new SUDS system).
- The Community Council raised the issue of the potential Thurso by-pass road which would link into Scrabster (this may be continued in the new CaS Plan, which is still being drafted for consultation).

4.3 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet [www.wam.highland.gov.uk/wam](http://www.wam.highland.gov.uk/wam). Access to computers can be made available via Planning and Development Service offices.

## 5. CONSULTATIONS

### 5.1 Highland Council TECS; Environmental Health: No objection.

Suggested condition regarding operational noise and levels of such at surrounding 'noise-sensitive' properties. Also some concerns about the close proximity of plots to the dwellings at Scrabster Cottages.

### 5.2 Highland Council Historic Environment Team: No objection.

The proposed development is located in an area where archaeological remains, features and deposits may survive. Condition ARC1 should be applied.

Dependent on the results of this work, further study may be required in advance of, and during, construction works. The archaeological work will be backed up by desk-based research to produce a report setting out the results and any required mitigation strategy. The applicant will need to engage the services of a professional archaeological contractor.

### 5.3 Highland Council TECS Flood Team: No objection.

Subject to the following conditions being applied to ensure the details of surface water disposal are approved prior to construction:

- 1) Full supporting calculations to demonstrate how the proposed surface water network and SUDS pond has been sized, as shown on drawing 99770/2000 should be submitted for written approval prior to construction commencing.
- 2) A riparian buffer strip of 6m from the top of banks of any watercourse should remain free from development in line with the Highland Council Supplementary guidance, for maintenance access purposes. Boundary fences / walls should be erected outwith this buffer strip.

### 5.4 SSE : No objection.

Note that there is a high-voltage overhead line around the site, which raises H+S works issues.

**5.5 Transport Scotland : No objection.**

Subject to the following conditions being applied to ensure the details of the access junction/splays, lighting, no connection to Trunk Roads drainage, the requirement for a travel plan.

**5.6 SEPA : No objection.**

After preliminary concerns over the lack of detailed information, SEPA withdrew their objection by letter dated 24.02.2014 subject to conditions. These should cover the SUDS design and should specially outline the requirement for the industrial sites to be provided with three levels of SUDS treatment and the roads two levels.

**6. DEVELOPMENT PLAN POLICY**

The following policies are relevant to the assessment of the application

**6.1 Highland Wide Local Development Plan 2012**

Policy No.28	Sustainable Design
Policy No.41	Business and Industrial Land
Policy No.61	Landscape
Policy No.64	Flood Risk
Policy No.65	Waste water Treatment
Policy No.66	Surface Water Drainage

**6.2 Caithness Local Plan 2002**

11.Scrabster I: Industry, 2.  
Inset Map 11.

**7. OTHER MATERIAL CONSIDERATIONS**

**7.1 Draft Development Plan**

Not applicable.

**7.2 Highland Council Supplementary Planning Policy Guidance**

Construction Environmental Management Process for Large Scale Projects (August 2010).

Flood Risk & Drainage Impact Assessment (March 2012).

### 7.3 **Scottish Government Planning Policy and Guidance**

PAN 61 Planning and Sustainable Urban Drainage Systems

PAN 79 Water and Drainage

## 8. **PLANNING APPRAISAL**

8.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

8.2 This means that the application requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

### 8.3 **Development Plan Policy Assessment**

The principle of developing this open farmland for industrial use has been established by the designation of this site within the Caithness Local Plan 2002, Policy Scrabster I:2 and the inset-map (Inset 11 Scrabster); these denote the site subject to 'not conflicting with the farm operations, the availability of services and substantial screen planting/landscaping around the perimeter'.

The proposal is therefore considered to be generally compliant with the Development Plan policy. A previous 5-year consent for this development 06/00528/FULCA was granted on 19/09/2008, which is similar to this proposal apart from the addition of the new road access from the A9.

### 8.4 **Material Considerations**

The principle of this application is accepted as it conforms to a Development Plan designation, and there is a previous planning consent. The main technical planning issues relate to roads access, drainage/SUDS and landscaping

1. The access issue relates primarily to the new junction that is being formed on the A9; the Applicant and Transport Scotland have met during the course of this application and resolved
2. Relative to the drainage/SUDS issue SEPA initially objected to the proposal because there was not sufficient detailed information; this issue was subsequently resolved by the applicant issuing enhanced detailing and SEPA have removed their objection, quantifying the issues they wish to be conditioned.
3. The landscaping of the site is a key element for this proposal, as until the individual units are developed the site needs to maintain an environmental standard and appearance that will not impact negatively upon its context. This will have the added benefit that the landscaping can get a head-start and begin to mature from the first growing season, ahead of the building works.
4. The proximity of the Farm Cottages to the new business plots is a cause for concern, relative to noise and disturbance from the new uses. To mitigate for this, Plots 1 and 2 will be restricted via condition to use classes 4 or 6 only.

## 8.5 Other Considerations – not material

The detail design of the buildings and layouts that will subsequently occupy the individual plots will be subject of a Design Brief, which will be conditioned for agreement with the applicant. The brief will create a design framework to ensure that there is a consistent level of quality across the site in terms of building design and materials, as well as plot layout and landscaping.

## 8.6 Matters to be secured by Section 75 Agreement

None.

## 9. CONCLUSION

9.1 All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

## 10. RECOMMENDATION

**Action required before decision issued** N

**Subject to the above**, it is recommended the application be **Granted** subject to the following conditions:

1. No development or work (including site clearance) shall commence until a programme of work for the evaluation, preservation and recording of any archaeological and historic features affected by the proposed development/work, including a timetable for investigation, all in accordance with the attached specification, has been submitted to, and approved in writing by, the Planning Authority. The approved programme shall be implemented in accordance with the agreed timetable for investigation.

**Reason** : In order to protect the archaeological and historic interest of the site.

2. No development shall commence until a Noise Impact Assessment has been submitted to, and approved in writing by, the Planning Authority. The assessment shall be carried out by a suitably qualified and competent person and shall assess the likely impact of noise emanating from the development on neighbouring properties. Furthermore, the following should comprise part of the assessment:-

- i. A description of the proposed development in terms of noise sources and the proposed locations and operating times of the same;
- ii. A description of any noise mitigation methods that will be employed. The effect of mitigation methods on the predicted levels should be reported where appropriate;
- iii. A detailed plan showing the location of noise sources, noise sensitive premises and survey measurement locations;
- iv. A survey of current ambient (LAeq) and background (LA90) noise levels at appropriate locations neighbouring the proposed site;

v. A prediction of noise levels resultant at neighbouring noise sensitive premises, for the operational phase of the proposed development. The raw data and equations used in the calculations should be provided; and

vi. An assessment of the predicted noise levels in comparison with relevant standards.

Development shall progress in accordance with the approved Noise Impact Assessment and all approved mitigation measures shall be implemented prior to the first occupation/use of the development, or as otherwise may be agreed in writing by the Planning Authority.

**Reason** : In order to safeguard the amenity of neighbouring properties and occupants.

3. The developer shall ensure that all plant, machinery or equipment installed or forming part of the individual plot developments, including any mechanical extraction, ventilation or refrigeration systems, shall be of such a type, so designed, installed, and thereafter operated and maintained such that noise levels at the nearest noise-sensitive properties are not increased. For the purposes of this condition, "noise sensitive premises" includes, but is not necessarily limited to, any building, structure or other development the lawful use of which a) falls within Classes 7 (Hotels & Hostels), 8 (Residential Institutions) or 9 (Houses) of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended), or b) is as a flat or static residential caravan.

**Reason** : In order to safeguard the amenity of neighbouring properties and occupants.

4. The development of building plots 1 and 2 shall be permanently limited to Use Classes 4 or 6 only.

**Reason** : In order to safeguard the amenity of neighbouring properties and occupants.

5. No development shall commence until full details of any external lighting to be used within the site and/or along its boundaries and/or access have been submitted to, and approved in writing by, the Planning Authority (in consultation with Transport Scotland). Such details shall include full details of the location, type, angle of direction and wattage of each light which shall be so positioned and angled to prevent any direct illumination, glare or light spillage outwith the site boundary. Thereafter only the approved details shall be implemented.

**Reason** : In order to ensure that any lighting installed within the application site does not spill beyond the intended target area, does not impact adversely upon the amenity of adjacent properties and does not result in 'sky glow'.

6. No development shall commence until details of a scheme of hard and soft landscaping works have been submitted to, and approved in writing by, the Planning Authority. Details of the scheme shall include:
- i. All earthworks and existing and finished ground levels in relation to an identified fixed datum point;
  - ii. A plan showing existing landscaping features and vegetation to be retained;
  - iii. The existing drystone wall around the site shall either be retained or re-built to at least the same height, as well as continuing down either side of the new access road;
  - iv. The location and design, including materials, of any existing or proposed walls, fences and gates;
  - v. All soft landscaping and planting works, including plans and schedules showing the location, species and size of each individual tree and/or shrub and planting densities; and

vi. A programme for preparation, completion and subsequent on-going maintenance and protection of all landscaping works.

Landscaping works shall be carried out in accordance with the approved scheme. All planting, seeding or turfing as may be comprised in the approved details shall be carried out in the first planting and seeding seasons following the commencement of development, unless otherwise stated in the approved scheme.

Any trees or plants which within a period of five years from the completion of the development die, for whatever reason are removed or damaged shall be replaced in the next planting season with others of the same size and species.

**Reason :** In order to ensure that the approved landscaping works are properly undertaken on site.

7. No development shall commence until arrangements for potable water and sewerage infrastructure to serve the site (including a programme for implementation) have been submitted, to, and approved in writing by, the Planning Authority. No part of the development shall be occupied until sewer connections and potable water storage infrastructure, as required, have been completed in accordance with the approved arrangements.

**Reason :** In order to ensure that water and sewerage infrastructure is carefully managed and provided timeously, in the interests of public health and environmental protection.

8. No development shall commence until full details of all surface water drainage provision within the application site (which should accord with the principles of Sustainable Urban Drainage Systems (SUDS) and be designed to the standards outlined in Sewers for Scotland Second Edition, or any superseding guidance prevailing at the time) have been submitted to, and approved in writing by, the Planning Authority in consultation with SEPA. in consultation with SEPA and any relevant others, prior to the commencement of development. Note the requirement for the industrial sites to be provided with three levels of SUDS treatment and the roads two levels of SUDS treatment. Thereafter, only the approved details shall be implemented and all surface water drainage provision shall be completed prior to the first occupation of any of the development.

**Reason :** To ensure that surface water drainage is provided timeously and complies with the principles of SUDS; in order to protect the water environment.

9. That prior to the occupation of any part of the development hereby permitted, the new access junction (generally in accordance with the layout shown on Fairhurst Drawing 99770/1006 Revision A, dated 14 February 2014 and titled Junction Visibility Splays) shall be implemented on the A9 trunk road to the satisfaction of the Planning Authority after consultation with Transport Scotland (TRNM, TRBO).

**Reason:** To ensure that the standard of access layout complies with the current standards and that the safety of the traffic on the trunk road is not diminished.

10. There shall be no drainage connections to the trunk road drainage system.

**Reason:** To ensure that the efficiency of the existing drainage network is not affected



11. No part of the development shall be occupied until a comprehensive Travel Plan that sets out proposals for reducing dependency on the private car has been submitted and approved in writing by the planning authority, after consultation with Transport Scotland, as the Trunk Roads Authority. In particular this Travel Plan shall identify measures to be implemented , the system of management, monitoring, review, reporting and the duration of the plan.

**Reason:** To be consistent with the requirements of Scottish Planning Policy (SPP) and PAN 75 Planning for Transport.

12. A Design Brief for the future development of the individual plots shall be agreed between the Applicant and the Planning Authority prior to these consented works commencing on-site.

**Reason:** To ensure that the development is sensitive to, and compatible with, its context and local landscape/building character.

## **REASON FOR DECISION**

The proposals accord with the provisions of the Development Plan and there are no material considerations which would warrant refusal of the application.

## **TIME LIMITS**

### **LIMIT FOR THE IMPLEMENTATION OF THIS PLANNING PERMISSION**

In accordance with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended), the development to which this planning permission relates must commence within THREE YEARS of the date of this decision notice. If development has not commenced within this period, then this planning permission shall lapse.

## **FOOTNOTE TO APPLICANT**

### **Initiation and Completion Notices**

The Town and Country Planning (Scotland) Act 1997 (as amended) requires all developers to submit notices to the Planning Authority prior to, and upon completion of, development. These are in addition to any other similar requirements (such as Building Warrant completion notices) and failure to comply represents a breach of planning control and may result in formal enforcement action.

1. The developer must submit a Notice of Initiation of Development in accordance with Section 27A of the Act to the Planning Authority prior to work commencing on site.
2. On completion of the development, the developer must submit a Notice of Completion in accordance with Section 27B of the Act to the Planning Authority.

Copies of the notices referred to are attached to this decision notice for your convenience.

### **Accordance with Approved Plans & Conditions**

You are advised that development must progress in accordance with the plans approved under, and any conditions attached to, this permission. You must not deviate from this permission without consent from the Planning Authority (irrespective of any changes that may separately be requested at the Building Warrant stage or by any other Statutory Authority). Any pre-conditions (those requiring certain works, submissions etc. prior to commencement of development) must be fulfilled prior to work starting on site. Failure to adhere to this permission and meet the requirements of all conditions may invalidate your permission or result in formal enforcement action

### **Flood Risk**

It is important to note that the granting of planning permission does not imply there is an unconditional absence of flood risk relating to (or emanating from) the application site. As per Scottish Planning Policy (p.198), planning permission does not remove the liability position of developers or owners in relation to flood risk.

### **Scottish Water**

You are advised that a supply and connection to Scottish Water infrastructure is dependent on sufficient spare capacity at the time of the application for connection to Scottish Water. The granting of planning permission does not guarantee a connection. Any enquiries with regards to sewerage connection and/or water supply should be directed to Scottish Water on 0845 601 8855.

### **SEPA**

Where a private foul drainage solution is proposed, you will require separate consent from the Scottish Environment Protection Agency (SEPA). Planning permission does not guarantee that approval will be given by SEPA and as such you are advised to contact them direct to discuss the matter (01349 862021).

Detailed advice for the applicant:

Surface water drainage

1. Further guidance on the design of SUDS systems and appropriate levels of treatment can be found in the CIRIA C697 manual entitled The SUDS Manual. Advice can also be found in our Guidance Note Planning advice on sustainable drainage systems (SUDS).

2. Note that on industrial sites infiltration techniques are only acceptable as the final level of treatment and this would mean that upstream SUDS devices, such as permeable paving system, will need to be lined.

3. Please refer to the SUDS section of our website for details of regulatory requirements for surface water and SUDS.

Regulatory advice for the applicant:

Details of regulatory requirements and good practice advice for the applicant can be found on our website at [www.sepa.org.uk/planning.aspx](http://www.sepa.org.uk/planning.aspx). If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at: Strathbeg House, Clarence Street, Thurso, KW14 7JS. Tel: 01847 894422.

### **Local Roads Authority Consent**

In addition to planning permission, you may require one or more separate consents (such as dropped kerb consent, a road openings permit, occupation of the road permit etc.) from TECS Roads prior to work commencing. These consents may require additional work and/or introduce additional specifications and you are therefore advised to contact your local TECS Roads office for further guidance at the earliest opportunity.

Failure to comply with access, parking and drainage infrastructure requirements may endanger road users, affect the safety and free-flow of traffic and is likely to result in enforcement action being taken against you under both the Town and Country Planning (Scotland) Act 1997 and the Roads (Scotland) Act 1984.

Further information on the Council's roads standards can be found at:

<http://www.highland.gov.uk/yourenvironment/roadsandtransport>

Application forms and guidance notes for access-related consents can be downloaded from:

<http://www.highland.gov.uk/yourenvironment/roadsandtransport/roads/Applicationformsforroadoccupation.htm>

### **Mud & Debris on Road**

Please note that it is an offence under Section 95 of the Roads (Scotland) Act 1984 to allow mud or any other material to be deposited, and thereafter remain, on a public road from any vehicle or development site. You must, therefore, put in place a strategy for dealing with any material deposited on the public road network and maintain this until development is complete.

### **SSE**

Within the proposed development there is a high-voltage overhead line (around the N < W and S boundaries). All works in proximity to an overhead line must be carried out in accordance with The Health and Safety Guidance note GS 6. The legislation dictates that where works are to be undertaken within 9m horizontal distance from an overhead line, positive steps must be taken to manage the risk identified on-site. These steps can include: making the line dead; erecting barriers at ground level; erecting high-level bunting and goal posts (6m from the line); using appropriate excavator, restricting the jib etc. Please contact our Connections and Engineering Bureau on 08000 483515 for further advice.

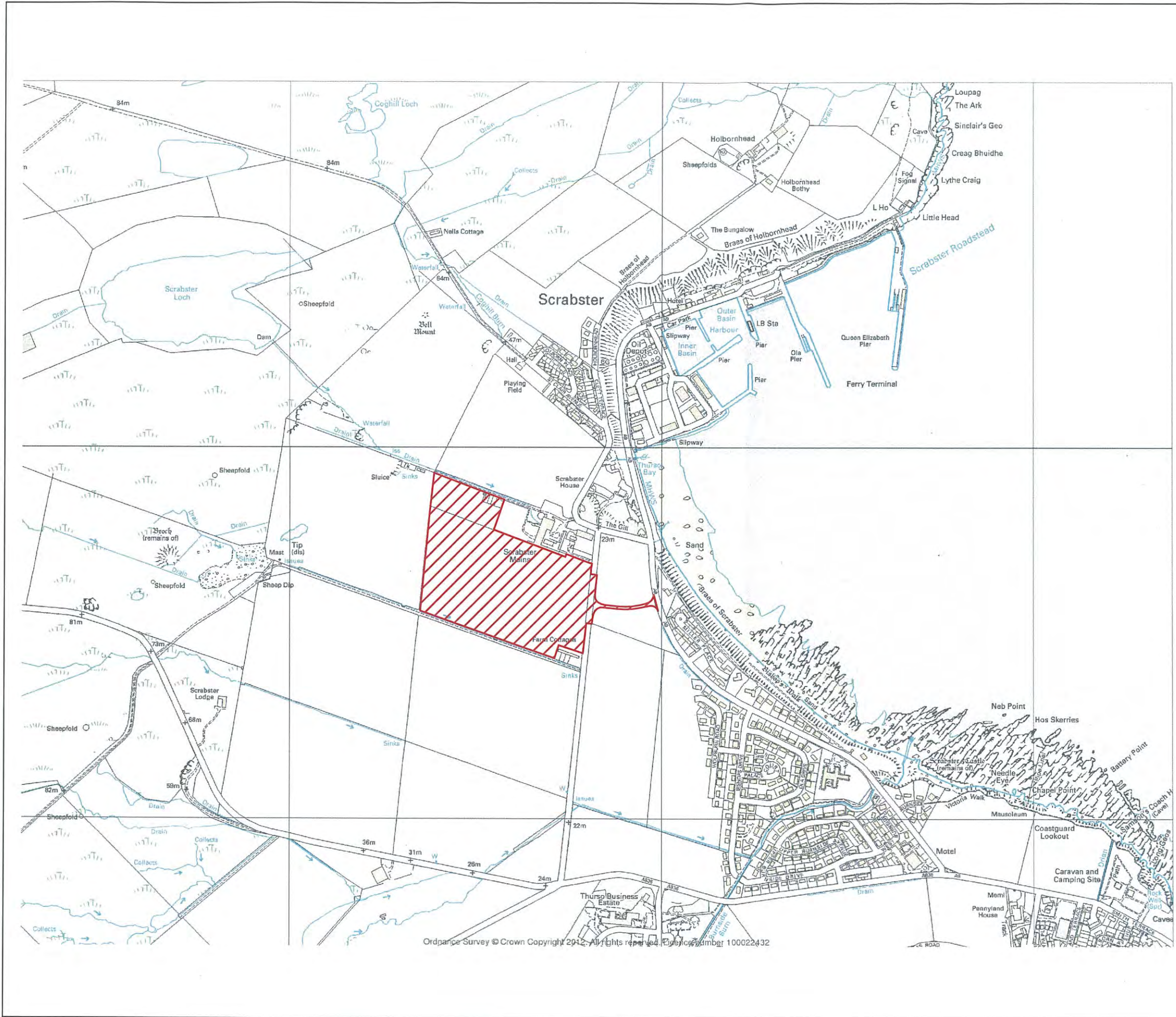
Signature: Dafydd Jones

Designation: North Area Planning Manager

Author: Norman Brockie

Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1 – Location Plan 99770/8005  
Plan 2 – Indicative Site Development Plan 99770/8002E  
Plan 3 – Landscape Masterplan 99770/8006A  
Plan 4 – Landscape Buffer Sections 99770/8007



Do not scale from this drawing.

**SAFETY HEALTH AND ENVIRONMENTAL INFORMATION**  
 IN ADDITION TO THE HAZARD/RISKS NORMALLY ASSOCIATED WITH THE TYPES OF WORK DETAILED ON THIS DRAWING, NOTE THE FOLLOWING RISKS AND INFORMATION.

RISKS LISTED HERE ARE NOT EXHAUSTIVE. REFER TO DESIGN ASSESSMENT FORM NO.

CONSTRUCTION

DEMOLITION

FOR INFORMATION RELATING TO USE, CLEANING AND MAINTENANCE SEE THE HEALTH AND SAFETY FILE

IT IS ASSUMED THAT ALL WORKS WILL BE CARRIED OUT BY A COMPETENT CONTRACTOR WORKING, WHERE APPROPRIATE, TO AN APPROVED METHOD STATEMENT.

AREA OF SITE SHOWN BY RED BOUNDARY:  
 14.4 ha  
 35.5 Acres

Rev.	Date	Description	Drwn.	Chkd.	Appd.
		Client:	<b>SCRABSTER HARBOUR TRUST</b>		
225 Bath Street GLASGOW G2 4GZ Tel: 0141 204 8800 Fax: 0141 204 8801					


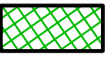

Project Title:  
**SCRABSTER INDUSTRIAL PARK**

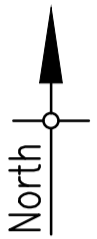
Drawing Title:  
**LOCATION PLAN**

Scale of A3: 1:10000	Status: Planning	Drawn: DM	Checked:	Approved:
Date: 06/09/13	Date:	Date:	Date:	Date:
Drawing No.:	99770/8005		Revision:	

Ordnance Survey © Crown Copyright 2012. All rights reserved. Licence number 100022432

LEGEND

- INDICATIVE DEVELOPMENT PLOTS SHOWN THUS: 
- INDICATIVE AREAS OF LANDSCAPING USED FOR VISUAL SCREENING SHOWN THUS: 
- PROPOSED ROUTE OF SURFACE WATER DRAINAGE SHOWN THUS: 



Rev.	Date	Description	Drwn.	Chkd.	Appd.
E	26/07/14	WEST BOUNDARY SCREENING WIDENED	MM	JS	JS
D	26/07/14	A9 JUNCTION REVISED	MM	JS	JS
C	01/08/13	INDICATIVE SCREENING ADDED TO WESTERN BOUNDARY	RD	JS	JS
B	13/08/13	TURNING HEAD REVISED	RD	JS	JS
A	01/07/13	DEVELOPMENT LAYOUT REVISED	MM	JS	JS

Client: **FAIRHURST** SCRABSTER HARBOUR TRUST

225 Bath Street  
GLASGOW  
G2 4GZ

Tel: 0141 204 8800  
Fax: 0141 204 8801

Project Title:  
**SCRABSTER INDUSTRIAL PARK**

Drawing Title:  
**INDICATIVE SITE DEVELOPMENT PLAN**

Scale of A1: <b>1:1000</b>	Status: <b>For Information</b>
Drawn: <b>MM</b>	Checked: _____ Approved: _____
Date: <b>25/07/13</b>	Date: _____ Date: _____
Drawing No.: <b>99770/8002</b>	Revision: <b>E</b>