

From: [Arfon Hughes](#)
To: [NDE](#)
Subject: response to the NDF
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Attachments: [draft-national-development-framework-response-form_Arfon_Hughes_8.11.2019.doc](#)

My response

yours
Arfon Hughes

Consultation Response Form

Your name	Arfon Hughes
Your address	[REDACTED]
Preferred contact details (email/phone/post)	[REDACTED]
<u>Organisation (if applicable)</u>	

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

I am ok with this but my main concern is that the numbers do not reflect where these developments need to be made. Will these be large schemes on town boundaries? Does this reflect where people want to live and the connections with their friends and families and work? This needs to reflect the statement on 'supporting our rural areas' especially with climate change and rising seas, rural areas are more likely to be the best places to consider future development.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

I disagree that using electric cars only is the answer to the future. A mix of different renewable energy vehicles should be considered eg hydrogen cars, which will not impact as much on metal extractions from foreign countries and add to the climate crisis.

Energy infrastructure is key to keeping rural communities sustainable and producing energy on a local basis from hydro, wind etc. should be looked at in detail so that the house owner / tenant of the future does not have to consider the extra cost of living in unaffordable housing.

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

[illegible]

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

If we are serious about climate change then we need to be mindful of the opportunities that we can harness to combat this. Why are district heat networks not able to be used in rural communities? If we only look at urban areas for this then we are not addressing the needs of Wales.

As someone who has looked into developing a district heating system in my own village it is more than viable for biomass, or geothermal springs, air or ground source heating can also be used directly for many varied heating purposes. Hot spring water is used to heat greenhouses, swimming pools etc. and in rural communities these can be easily set up on a small scale making villages more sustainable, providing job opportunities for residents, tenants and have a huge effect on the carbon footprint and effect on climate change. This will also have an effect on retaining young people, mitigate the effect on the Welsh language and culture and keep the local economy stronger. Grwp Cynefin has been involved in hydro and solar schemes as well as trialled air and ground source heat pumps.

When building small rural housing schemes a district heating plant can be set up and connected to numerous other buildings in the vicinity and heat sold to entrepreneurs who want to address food production and other business opportunities. A village with 100 or so properties already in place is quite possible on top of other community and business opportunities to have a district-heating scheme and is quite possible to be accomplished. Connecting to existing properties with new developments should not be a

hindrance to developing a district heat scheme.

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

I am of the opinion that strategic plans do not address rural communities enough and that not enough discussion is had to consider how the rural west and mid wales are considered a priority if Welsh Government are serious about supporting their other policies. I am conscious that it seems that the strategic emphasis of the NDF is on the east of Wales and the marches and that making strong links with the English regions is the way forward, to the detriment of the more rural areas of Wales. I would like to see that cross regional developments in Wales are considered, as these boundaries are very artificial when it comes to developing housing for the residents of Wales. Better infrastructure road and rail, power and internet need to be the driving factor for residents to be able to live in rural areas across borders of the regions. E.g., Residents in Tywyn Gwynedd have to travel to Aberystwyth for banking, general hospital etc that are in different regions.

Does the Growth Deal address the needs of rural communities? I am very dubious and if this is the case then the North / South east will be considered the only strategic objective for housing and the economy thus depriving the rural areas of affordable housing and infrastructure which could ensure more sustainable communities and regions with connections to Mid and South Wales and not to the North / South East and England.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

If WG is serious in ensuring their Welsh Language policies are considered within the NDF then the emphasis in keeping young people in their rural communities is paramount. Considering the emphasis is on the North Wales coastal corridor then I cannot understand how the NDF will develop plans that is geared to the North East when the majority of Welsh Speakers are in the West! How will the NDF address the housing needs to ensure Welsh speakers can remain in their communities is not clear!

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please refer to the Policy;

Comments below.

<https://gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf>

Cymraeg 2050 A million Welsh speakers

Achieving our targets To achieve our targets, we will drive the following transformational changes. Successful implementation will be dependent on a number of organisations working together.

- Make rapid progress to expand Welsh-medium early years provision by 150 nursery groups over the next decade to facilitate a seamless transition into Welsh-medium education.
- Increase the proportion of each school year group receiving Welsh-medium education from 22 per cent (based on 7,700 seven-year-old learners in 2015/16) to 30 per cent (about 10,500 in each year group) by 2031, and then 40 per cent (about 14,000 in each year group) by 2050.
- Transform how we teach Welsh to all learners in order that at least 70 per cent of those learners report by 2050 that they can speak Welsh by the time they leave school.
- Increase the number of primary teachers who can teach in Welsh from 2,900 to 3,900 by 2031 and 5,200 by 2050; increase the number of secondary teachers who can teach Welsh from 500 to 900 by 2031 and 1,200 by 2050; and increase the number of secondary teachers who can teach through the medium of Welsh from 1,800 to 3,200 by 2031 and 4,200 by 2050.
- Reform the post-16 Welsh-medium and bilingual education and skills offer to ensure that young people have the opportunity to continue developing bilingual skills to support a prosperous economy.
- Review the legislation which underpins the Welsh language to ensure it offers a strong foundation for promoting and facilitating the use of Welsh.
- Ensure that Welsh Government leads by example by promoting and facilitating increased use of Welsh by our own workforce. • Develop a new regional focus to economic development to help all parts of Wales to benefit from prosperity and support each area to develop its own distinctive identity. • Transform the Welsh language digital landscape with particular focus on language

technologies.

- Develop a national programme to increase understanding of bilingualism. 13 How we will put the strategy into action In order to realise our vision, we will:

- provide strong leadership, and use our influence for the benefit of the language • provide financial support to promote and facilitate the use of Welsh

- legislate to provide a strong infrastructure for the language

- lead by example in our use of and approach towards the Welsh language. The successful implementation of the strategy will require an appropriate balance between efforts to promote and facilitate the use of Welsh in a positive and inclusive manner, a drive to improve systematic planning of Welsh-language provision, and a robust regulatory framework. We will publish work programmes at regular intervals which will detail what action is required to achieve our goal. The first of these work programmes for 2017–21 is published alongside this strategy. We will continuously monitor and evaluate the implementation of this strategy to ensure that the transformational changes required are delivered. Indicators 36 and 37 of the National Indicators for Wales will be used to track progress against the national well-being goal and towards the two overarching targets of this strategy. The indicators are as follows:

- Well-being indicator 36: Percentage of people who speak Welsh daily and can speak more than just a few words of Welsh.

- Well-being indicator 37: Percentage of people who can speak Welsh. As we implement this strategy, we will follow some basic principles. These are outlined over the next pages.

In order to reach a situation by 2050 where there are a million Welsh speakers and increased use of Welsh language skills, concerted action is required now and in the future to:

- increase the number of Welsh speakers

- increase and widen opportunities for them to use their skills

- create an environment where everyone will want to use the Welsh language. Language use and language behaviour are conditioned by a variety of interdependent factors. The theoretical model for language revitalisation proposed by Joshua Fishman, and subsequent approaches that have sought to illustrate the multi-dimensional nature of language behaviour, have provided a basis for understanding the dynamics of language use (Grin and Moring 2002; Darquennes 2007)². Miquel Strubell (Strubell 2011) introduced his Catherine Wheel model to demonstrate the interrelationship between:

- language learning

- demand for and supply of goods and services in the language

- consumption of goods and services in the language

- perception of usefulness of the language

- motivation to learn and use the language. The fundamental principle introduced by Strubell is that the vitality of a language hinges on the interaction between a number of interdependent elements which generate growth. The wheel is an attempt to illustrate the interdependency between these components. Despite the limitations associated with a schematic model of this kind, the wheel continues to provide a useful starting point as we develop a sustainable infrastructure for the Welsh language. At the same time, creating and implementing a strategy for the Welsh language in the year 2050 requires an understanding of how speakers use the Welsh language today, and a consideration of how they are likely to do so in future. We must be prepared to adapt our language planning policy methods to reflect the social, economic and political changes that shape, and which will continue to shape, contemporary Wales. We do not have a detailed picture of how people will be living their lives by the year 2050, but in all probability the developments witnessed in recent decades will continue to transform our everyday lives. We see how globalisation, mobility, and more varied interpretations of concepts such as the family unit and 'community' have led to far-reaching changes. We also see how developments in technology offer new ways of carrying out our work and communicating with each other. At the same time, these changes have not replaced the importance of communities which are defined by geography, social networks based on face-to-face communication, and the key role of households as the focus of family life.

Areas with a high density of Welsh speakers remain central to our vision. These are the places in Wales which create the most favourable circumstances to foster Welsh speakers: the higher the number of speakers living in a geographical area, the higher the probability of opportunities being available to them to use the language in day-to-day communication. These are also the places which have the highest number of fluent Welsh speakers. These areas tend to be characterised by the fact that they are rural in nature, with economies that currently depend largely on the public sector, agriculture and tourism, with towns acting as centres serving wide areas for services and employment. There is no easy answer to the challenges facing these communities. However, we are clear about the need for language planning and economic development to work in tandem in order to create Welsh-speaking communities that are economically and linguistically viable.

Community and economy Develop the economy to ensure a firm footing for Welsh-speaking communities The importance of sustaining and growing communities with a high density of Welsh speakers has already been noted. It is important for several reasons. These communities contain the higher percentages of Welsh speakers who describe themselves as fluent speakers as well as higher percentages of speakers using the language most frequently. While each community is unique, there are some common characteristics to these communities. They include high population mobility – young Welsh speakers leaving, and an influx of mainly older people. A number of these areas are rural, and largely dependent on the agricultural industry, the food industry and tourism. These areas also contain market towns, and university towns with high reliance on the public sector, e.g. health services and local government. These areas also contain pockets of deprivation and rural poverty, with average salaries among the lowest in the United Kingdom. 62 The discourse surrounding the

future of Welsh-speaking communities is often characterised by the need to protect them for future generations, and consequently the mindset that they should therefore be protected from change and economic growth. While the reasons for such a mindset are understandable, it is incumbent on the Government to promote economic growth and to spread prosperity across Wales. We cannot expect Welsh-speaking communities to remain static while the nature of society is changing. As such, the Welsh Government fully recognises the importance of developing a thriving, sustainable economy in rural areas, including in the areas described previously. We want to see good jobs that enable young people to remain or, if they leave for different life experiences, to return to these areas to live and raise a family. We need more than employment to keep people in these areas, and to attract them back. There is a need for good careers that allow people to move from one job to another. One key aspect of this is the agriculture industry. Protecting the interests of the industry in light of the UK's exit from the European Union will be a priority for us. Another aspect is locating public sector jobs in Welsh-speaking areas – areas which contain a readily available bilingual workforce. We also want to ensure that Welsh speakers in these areas and beyond are given every encouragement to start businesses. There is also scope to learn more about the potential of cooperative ventures working in Welsh as a means for generating community benefit. There is an opportunity in Welsh-speaking areas to capitalise further on the opportunities offered by the Welsh language and the existence of a bilingual workforce. The value of the Welsh language to the economy includes the language industry – for example education, translation, language planning, consultancy services, corpus work and language technology – all directly associated with the language. In other fields – such as culture, media and tourism – the language could be an integral part of the provision. The Welsh language can also enhance a sense of place and many brands already use it as a unique selling point. Development and the Welsh language In an open market economy like Wales, economic growth and development will to some extent be uneven in its distribution. However, there is a role for government in seeking to ensure that all parts of Wales can benefit from economic growth. To support this, we will take steps to deliver a regional dimension to economic development that supports national delivery. In delivering a regional focus, we will help all of Wales, including Welsh-speaking communities to benefit from prosperity and become attractive places in which people want to live, work, learn and invest. The land use planning system should contribute to the vitality of the Welsh language by creating suitable conditions for thriving, sustainable communities, supported by an awareness of the relevant principles of language planning. Decisions regarding the type, scale and exact location of developments within a specific community has the potential to have an effect on language use, and as a result on the sustainability and vitality of the language. This calls for strengthening the relationship between language planning and land use planning. The Welsh Government maintains that Welsh language considerations should inform the process of preparing local development plans, and guidance is available to assist planning authorities in this regard. Under the Planning (Wales) Act 2015, development planning at all levels now requires such plans to include an assessment of the likely effects of their policies on the Welsh language. Our aim: support the socioeconomic infrastructure of Welsh-speaking communities.

If WG is serious in ensuring their Welsh Language policies are considered within the NDF then the emphasis in keeping young people in their rural communities is paramount. Considering the emphasis is on the North Wales coastal corridor then I cannot understand how the NDF will develop plans, which is geared to the North East when the majority of Welsh Speakers are in the West! How will the NDF

address the housing needs to ensure Welsh speakers can remain in their communities is not clear!

The NDF policy and the Cymraeg 2050 A million Welsh speakers do not work together.

There is also a concern that power of large developers. developing several out-of-town developments leading to a significant deterioration in the condition of town centres. The financial power and resources of developers can dominate the doubts of local planning officers and I am completely opposed to the developers setting their own assessors to measure the impact of house building on the Welsh language.

Population growth or decline and housing developments and current housing stock, needs further investigation. What is the correlation between birth and death rates, the number of empty homes and the total number of houses likely to be completed by the end of each LA LDP period?

If more people die than are born, it is difficult to see that a large number of houses are needed, especially if there are a significant number of empty properties in each county. This may include a number of houses for sale that will be more difficult to sell if a number of new houses are built that are subject to higher building standards. There may well be a need for specific types of housing to meet local needs but I wonder if the thousands of houses that have been part of the Local Development Plans are needed. How realistic are the Welsh Government and LA's projections are in determining the numbers of houses to be built in the current Development Plans.

Although tourism is once again identified as a source of jobs and development, I am doubtful of the influence of tourism on many areas of west Wales. Research from the 1950s and 1970s [1] showed that tourism is anglicised in many areas of Wales. Seasonal and low-paid jobs are most commonly offered and such jobs are not attractive to local academically successful young people. Research dating from 2001 and focusing on the Isle of Anglesey [2] shows that a significant number of people who run the tourism businesses come from England and are unaware of the importance of the Welsh language in these areas. A significant number of immigrants who come to live in west Wales have tasted holidays here before deciding to settle. We know that house prices in most of England are well above the Welsh average and it is very easy to sell a home in England and retire to west

Wales.

Like all Planning documents, there are numerous references to sustainability and diversity, but of course these comments refer to the environment and not to Welsh as one of the oldest languages in Europe. Laws restrict the rights of builders to disturb bats, the great crested newt, and even the poison adder. This National Development Framework needs to create strong conditions to sustain our unique language and culture that is part of the cultural diversity of humanity.

By implementing the recommendations of the organization Dyfodol i'r laith

Dyfodol i'r laith is a non-partisan organization that works for the benefit of the Welsh language. The aim of the organization is to influence by the constitutional means the substance and content of public policy and legislation in order to promote the growth and prosperity of the Welsh language in all policy areas. It will act for the benefit of Wales and its people, gaining support and respect for the language and ensuring that the Welsh language is a living issue on the political agenda.

There is hope that by building on the encouraging principles of affordable housing and sensible developments in rural Wales, I can see the Planning system playing a significant role in creating a million Welsh speakers by the middle of the century.

[1] J. Gareth Thomas 1956 and E.G. Bowen and Harold Carter 1974

[2] Dylan Phillips and Catrin Thomas [Aberystwyth University]. The Effects of Tourism on the Welsh Language in North West Wales

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and

on treating the Welsh language no less favourably than the English language.

See above

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

The emphasis now should be on local small scale generation of renewable non-nuclear energy which will create a more sustainable Wales and help keep people in their local communities which will strengthen their resolve in being more capable of combating poverty, health and well-being etc.

Energy infrastructure is key to keeping rural communities sustainable and RSL's could be a catalyst to make this work in rural communities as proven by Grwp Cynefin Housing association et al.

All rural areas can benefit and not specific corridors that will not be conducive to sustainable communities. Attracting cross border England / Wales commuting is not supporting the environmental, cultural and sustainable policies of WG. The emphasis should be on local economy, Wales wide infrastructure where applicable, joining Welsh communities in Housing, Socially Economically and Environmentally.

16. Are you...?

Providing your own personal response	<input checked="" type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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