

### THE WEST LOTHIAN LOCAL DEVELOPMENT PLAN (LDP)

### CONSULTATION RESPONSE PORTAL

#### Have Your Say on the Proposed Plan

#### Introduction

West Lothian Council has published its Proposed Plan together with supporting documents including an Environmental Report (SEA), Habitats Regulation Appraisal, Strategic Flood Risk Assessment and Equalities & Human Rights Impact Assessment. These can be viewed on the West Lothian Council website at www.westlothian.gov.uk/proposedplan.

If you wish to make representations on the Proposed Plan or associated documents you are encouraged to use this online consultation portal. It's quick and easy and will help us to process representations more efficiently, reducing the overall cost and environmental impact of the exercise.

You do not need to complete this questionnaire in a single visit. Just simply put your Survey Reference Number (CODE) in the top right corner of the screen to allow you to continue with your submission at a later date.

If you need assistance with completing or submitting your representation online please call the Customer Service Centre (CSC) on 01506 280000. Please advise the Customer Service Centre that your enquiry relates specifically to the Local Development Plan and ask for it to be logged and directed to the Development Plan and Environment Team. Someone will contact you. Alternatively you can email us at <u>wlldp@westlothian.gov.uk</u> We will endeavour to respond as quickly as possible but in any event within 3 working days of receiving your enquiry.

It is important that all representations are submitted no later than midnight on Sunday 22 November 2015. Representations received after that time will not be considered.

Your comments should be concise, having regard to paragraph 84 of Scottish Government Circular 6/2013: Development Planning which states that representations should be no more than 2,000 words plus any limited supporting productions.

#### Data Protection Statement

Please be aware that when you make representations on the Proposed Plan through the consultation portal (and/or in a conventional written format) personal information provided as part of a representation cannot be treated as confidential. Representations require to be made available online and for public inspection at the council's office (this would include your name but would exclude any information which would be subject to the Data Protection Act 1998 i.e. signature, postal address, telephone number, email).

We are also required to pass these details to the Scottish Government's Directorate of Planning and Environmental Appeals (DPEA). This is because they may at a later date wish to invite you to an Examination in Public of the Proposed Plan to discuss your representation.

Before using the consultation portal you should also note that any information posted may be subject to disclosure under the Freedom of Information (Scotland) Act 2002. West Lothian Council will not be liable for any loss or damage arising from or in connection with the disclosure of any information including the disclosure of user generated content.

### 1. GENERAL INFORMATION

# Your Details

Please indicate in what capacity you are making this submission: \*

Please note that this is a mandatory field

- $\checkmark$  as an individual (and representing your own views)
- $\Box$  as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

#### Please comp ete the following contact information: \*

Please note that this is a mandatory field

Title	Mr
First Name	Christopher
Surname	Thomas
Email Address	
Telephone	
Postal Addesss	
Organization Name	N/A
Client's Name	N/A

Is this the first time you have made a written representation on the Proposed Plan?\*

Please note that this is a mandatory field

- yes
- C no

If you have previously submitted a site to be considered for development when the Council was initially seeking Expressions of Interest (EOI), or commented on the Local Development P an at the Main Issues Report (MIR) stage, or made a previous submission to the Proposed Plan please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you

Enter EOI (Expression of Interest) reference here
Enter MIRO (Main Issues Report) reference here
MIRQ0032

Please enter your survey reference number in the text box below. \*

Survey Reference Number (CODE) can be found in the top right corner of this screen Survey Reference Number (CODE) will allow you to save your responses and return to finish the survey later

Please keep a note of your Survey Reference Number (CODE) for future reference

Please note that this is a mandatory field

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#### 2. FOREWORD (page 4)

This introduction by the Leader of the Council establishes the ro e of the LDP and how it will he p deliver the council's core objectives.

Do you wish to make a comment?

- yes
- C no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written

 the Introduction refers to "successful strategies, policies and objectives of the previous West Lothian Plan (2009)" I think any claims of "successful strategies" in terms of Linkingow are a heavily optimistic assessment. There has been little development of appropriate new housing aligned to infrastructure development, with significant problems remaining in terms of traffic congestion; lack of parking (especially for rail commuters); education capacity and air quality. These have a negative impact on the local community and the environment.

2. The Introduction says: "The Vision which the plan aspires to cannot however be delivered by the council on its own. It will instead require commitment from partners in all sectors to work together and I therefore look forward to maintaining and developing existing relationships and forging new alliances in the coming years in order to achieve the best outcomes for the people and the environment of West Lothian and to deliver the vision set out in the plan"

As far as I can see very little if any notice has been taken in preparing the Plan following the feedback on the MIR. Also, I have little confidence that the Council will take any notice of, or build relationships with, such groups as the Community Councils, Linlithgow Civic Trust, Linlithgow Business Association etc. These have combined to produce an alternative plan via the "Linlithgow Planning Forum" - will their views have any impact - I strongly suspect not

3. I may have missed it amongst all the documentation, but I can see no endorsement (or comment) from the elected Linlithgow Councillors - surely they should be giving ther views - or is this not part of the process?

### 3. BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

Do you wish to make a comment?

- C yes
- no

#### Please use the text box below for comments.

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# 4. CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

Do you wish to make a comment?

- O yes
- no

Please use the text box below for comments.

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# 5. ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the Council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the P anning etc (Scotland) Act 2006 and what documents will accompany the p an i.e. the Action Programme etc.

Do you wish to make a comment?

- C yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written

# 6. VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

Do you wish to make a comment?

- yes
- C no

If you wish to make comments p ease begin by selecting the relevant sub-section(s) of Vision Statement and Aims from the list below.

- Economic Development and Growth (page 8)
- Community Regeneration (page 8)
- Sustainable Housing Locations (page 9)
- □ Infrastructure Requirements and Delivery (page 9)
- Town Centres and Retailing (page 9)
- The Natural and Historic Environment (page 9)
- Climate Change and Renewable Energy (page 9)
- Waste and Minerals (page 9)

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i e your representation is an objection) or if your representation supports the Proposed Plan as written

Sustainable Housing Locations (page 9) The impact on traffic congestion / parking on all the sites around Manse Road (Linlithgow) would create huge strains on the Canal Basin area. These cannot proceed without solutions for traffic flow and additional parking - as well of course withoput resolving the capacity constraints at Linlithgow Academy.

### 7. THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

Do you wish to make a comment?

- yes
- C no

If you wish to make comments p ease begin by selecting the relevant sub-section(s) of the Spatial Strategy from the list below.

- $\square$  Economic Development and Growth (page 12, paragraphs 5.11-5.22)
- Flexibility within traditional industrial estates (page 14, paragraphs 5.24-5.25)
- Enterprise Areas (page 17, paragraphs 5.24-5.25)
- □ Local business opportunities, small business start-ups and working from home (page 17, paragraph 5.26)
- Tourism (page 17, paragraphs 5.27-5.28)
- Promoting community regeneration (page 19, paragraphs 5.29-5.35)
- ✓ Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)
- Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)
- New Housing Sites and Design (page 24, paragraphs 5.4-5.56)
- 🗌 Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)
- Whitburn/Charette (page 26, paragraph 5.62)
- Linlithgow and Linlithgow Bridge (page 26-27)
- Deans South, Livingston; Area for Comprehensive Re-development (page 27, paragraph 5.68)
- Affordable Housing (page 27, paragraphs 5.69-5.74)
- Accommodation for Gypsies, Travellers and Travelling Show People (page 29, paragraph 5.75)
- Residential Care and Supported Accommodation (page 29, paragraphs 5.76-5.77)
- □ Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)
- Providing for Community Needs (page 32, paragraphs 5.85-5.88)
- Education (page 32, paragraphs 5.89-5.92)
- Healthcare Provision (page 33, paragraphs 5.93-5.96)
- Sports Facilities (page 33, paragraphs 5.97-5.101)
- □ Green Infrastructure and Green Networks (page 34, paragraphs 5.102-5.105)
- Water and Drainage (page 34, paragraphs 5.106-5.107)
- Travel in and around West Lothian (page 34, paragraphs 5.108-5.112)
- Roads (page 35, paragraph 5.113)
- A71 Corridor (page 35, paragraphs 5.114-5.115)
- A801 Corridor (page 35, paragraphs 5.116-5.117)
- A89/A8 (page 35, paragraphs 5.118-5.126)
- Rail (page 37, paragraphs 5.127-5.130)
- Walking and Cycling (page 37, paragraphs 5.131-5.132)
- Town Centres and Retailing (page 39, paragraphs 5.133-5.138)
- □ Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)
- Countryside Belts (page 42, paragraph 5.144)
- Development in the Countryside (page 42, paragraphs 5.145-5.147)
- Lowland Crofting (page 44, paragraphs 5.148-5.152)
- □ Green Networks, Local Biodiversity Sites and Geodiversity Sites (page 45, paragraphs 5.153-5.155)
- Forestry (page 46, paragraphs 5.156-5.163)
- Union Canal (p.49 paragraphs 5.164-5.165)
- Pentland Hills Regional Park (page 49, paragraphs 5.164-5.165)
- Country Parks (page 50, paragraph 5.169)
- Allotments/Community Growing (page 51, paragraphs 5.170-5.171)
- Temporary/Advance Greening (page 51, paragraphs 5.172-5.174)
- Biodiversity (page 52, paragraphs 5.175-5.180)
- Geodiversity (page 53, paragraph 5.181)
- West Lothian Open Space Strategy (page 53, paragraphs 5.182-5.184)
- Historic and Cultural Environment (page 54, paragraphs 5.185-5.187)
- Conservation Areas (page 55, paragraphs 5.185-5.188)

- Former Bangour Village Hospital, Dechmont (page 56, paragraph 5.189)
- Conservation Area at Abercorn/Hopetoun Estate (page 56, paragraph 5.190)
- Other Areas of Built Heritage and Townscape Value (page 57, paragraphs 5.191-5.199)
- Listed Buildings (page 58, paragraphs 5.185-5.187)
- Historic Gardens and Designed Landscapes (page 59, paragraphs 5.200-5.201)
- Historic Battlefields (page 60, paragraph 5.202)
- Archaeology (page 60, paragraph 5.203)
- □ Scheduled Monuments (page 60, paragraphs 5.204-5.206)
- Public Art (page 61, paragraphs 5.207-5.208)
- Climate Change Measures (page 62, paragraphs 5.209-5.214)
- Low Carbon Development and Renewable Energy (page 63, paragraphs 5.215-5.221)
- □ Wind Farms and Wind Turbines (page 65, paragraphs 5.222-5.225)
- Energy and Heat Networks (page 66, paragraphs 5.226-5.229)
- 🗆 Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing (page 67, paragraphs 5.230-5.232)
- □ The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)
- Air Quality and Noise (page 70, paragraphs 5.240-5.242)
- Edinburgh Airport (page 71, paragraph 5.243)
- Noise (page 71, paragraph 5.244)
- Contaminated Land (page 71, paragraphs 5.245-5.246)
- Vacant and Derelict Land (page 72, paragraphs 5.249-5.250)
- Minerals and Waste (page 73, paragraphs 5.251-5.256)
- Site Restoration (page 75, paragraphs 5.257-5.238)
- Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)
- Waste (page 76, paragraph 5.260)

#### Please use the text box below for your comments.

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Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)

I can't se any evidence for Linlithgow that the Council has proposals to ensure that necessary social and physical infrastructure accompanies growth

### 8. DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

Do you wish to make a comment?

yes

C no

If you wish to make comments p ease begin by selecting the relevant Sett ement(s) from the list below.

- Addiewell & Loganlea (page 79)
- Armadale (page 80)
- Bathgate (page 81)
- Blackburn (page 82)
- Blackridge (page 83)
- Breich (page 83)
- Bridgehouse & Bridgecastle (page 83)
- Bridgend (page 83)
- Broxburn (page 84)
- Burnside (page 84)
- Dechmont & Bangour (page 85)
- East Calder (page 85)
- East Whitburn (page 86)
- Ecclesmachan (page 86)
- Fauldhouse (page 86)
- Greenrigg (page 86)
- Kirknewton (page 87)
- Landward area (page 87)
- ☑ Linlithgow & Linlithgow Bridge (page 89)
- Livingston (page 90)
- Longridge (page 93)
- Mid Calder (page 93)
- Newton and Woodend (page 93)
- Philpstoun/East & West Philpstoun/Old Philpstoun (page 93)
- Polbeth (page 93)
- Pumpherston (page 93)
- Seafield (page 93)
- Stoneyburn/Bents (page 94)
- Threemiletown (page 94)
- Torphichen (page 94)
- Uphall (page 94)
- Uphall Station (page 94)
- West Calder & Harburn (page 95)
- Westfield (page 95)
- Whitburn (page 96)
- Wilkieston (page 97)
- Winchburgh (page 97)

Please enter site reference(s)/proposals reference (as appropriate) and location/site address below.

Site Reference/ Location / Site Address can be found in the relevant Settlement Statement

	site reference	tocation, site address
Linlithgow & Linlithgow Bridge (page 89)	H-LL4; H LL10	East of Manse Road; Clarendon Farm

cito reference

Please use the text box below for comments.

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location / site address

	Comment			
Linlithgow & Linlithgow Bridge (page 89)	In the absence of infra-structure improvements these proposals will put intolerable pressure Linlithgow. For Manse Road / the Union canal bridge, the developments around Manse Road a for congestion & station parking. Also re H-LL4, how can access for the South site possibly di impact on road safety and the homes around Riccarton Road	are simply not credible without relief proposals irectly on to Manse road without severe adverse		
9. APPE	PENDICES (page 99)			
A number o	er of appendices are included at the end of the LDP which provides additional detail on specific eler	nents of the Proposed Plan.		
Do you wis	wish to make a comment?			
C yes	25			
no	0			
lf you wish	rish to make comments p ease begin by selecting the relevant Appendix(es) of the Proposed Plan fro	m the list below.		
Аррен	ppendix 1 - Employment Land Allocations (page 99)			
Appendix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)				
🗌 Аррен	ppendix 3 - Schedule of Land Ownership (page 259)			
🗌 Аррен	ppendix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)			
🗌 Аррен	ppendix 5 - List of Policies (page 273)			
Appendix 6 - List of Proposals (page 275)				
Please use the text box below for your comments.				
is presented t	iments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be cons ted to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. you the Proposed Plan as written			
Appendix 1	dix 1 - Employment Land Allocations (page 99)			
Appendix 2	dix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)			
Appendix 3	tix 3 - Schedule of Land Ownership (page 259)			
Appendix 4 265)	dix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page			
Appendix 5	lix 5 - List of Policies (page 273)			

Appendix 6 - List of Proposals (page 275)

# 10. GLOSSARY (page 280)

An exp anation of unfamiliar terms or expressions used in the LDP is provided to assist understanding of the document.

Do you wish to make a comment?

- C yes
- no

Please use the text box below for comments.

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### 11. PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

Do you wish to make a comment?

- yes
- C no

If you wish to make comments p ease begin by selecting the relevant Proposals Maps from the list below.

- Proposals Map 1 West Lothian
- ▼ Proposals Map 2 Linlithgow & Broxburn Area
- Proposals Map 3 Livingston Area
- Proposals Map 4 Bathgate Area
- Proposals Map 5 Villages

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination Please indicate whether you are seeking a change to the Proposed Plan (i e your representation is an objection) or if your representation supports the Proposed Plan as written

Proposals Map 2 - Linlithgow & Broxburn Area

Ther Map is far too small to see the details clearly even when printed

### 12. ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

Do you wish to make a comment?

- C yes
- no

If you wish to make comments p ease begin by selecting the relevant Accompanying Documents from the list below.

- □ Strategic Environmental Assessment (SEA) Environmental Report.
- 🔲 Equalities & Human Rights Impact Assessment (EQHRIA).
- Strategic Flood Risk Assessment (SFRA).
- Habitats Regulations Appraisal.
- Transport Appraisal (TA).
- Action Programme.

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i e your representation is an objection) or if your representation supports the Proposed Plan as written

Strategic Environmental Assessment (SEA) Environmental Report.	
Equalities & Human Rights Impact Assessment (EQHRIA).	
Strategic Flood Risk Assessment (SFRA).	
Habitats Regulations Appraisal.	
Transport Appraisal (TA).	
Action Programme.	

### **13. ADDITIONAL COMMENTS**

Do you wish to submit any additional comments on the LDP?

yes

C no

Please use the text box below for your additional comments on the LDP.

Your comments should be concise and limited to no more than 2,000 words You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i e your representation is an objection) or if your representation supports the Proposed Plan as written To reinfoce my views, as I am not toally comfortable that this format has enables me to do so: Overvi Whilst I respect the sentiment and broad objectives of the Plan, the devil is always in the detail. Therefore, as a Linlithgow resident I strongly object to the adoption of this plan without any clear strategy to show how the new housing will march hand in hand with: (i) physical infrastructure improvements - particularly re traffic, transport and parking congestion (ii)education capacity  ${\bf \hat{t}}$  social / community facilities e.g. health (iii) safeguarding the environment (e.g. the Upper Linlithgow and Union Canal preservation area) Linlithgow impact:
 1.1 the Council seems to be failing to live up to its own benchmarks and values with regard to: The LDP Vision Statement : "housing options will be supported by the full range of education, community and health facilities plus better and sustainable transport options". Where is the evidence of this? - LDP assertion In Housing Growth & Sustainable Housing Locations (section 5.37) "to ensure the necessary social and physical infrastructure accompanies growth" . Nothing seems to be outlined? Graham Hope's appeal that the "the council and citizens of West Lothian should work together". I can see little that suggests any feedback to the MIR from individuals or local bodies (e.g. Linlithgow & Linlithgow Bridge Community Council) have been taken on board 1.2 It is difficult to see how any of the new housing proposals (569 total) for Linlithgow can be allowed to proceed without detailed infra-structure and (particularly) education proposals to support. There is no clarity on the former (traffic & parking congestion; medical resources, air quality etc) and no comment (as far as I see) regarding the status of the proposed new secondary school at Winchburgh. 2. Specific Housing proposals for Linlithgow 2.1 Hone should proceed without a strategic plan that clearly shows how new house building and infra-structure & education improvements march hand -in hand. 2.2 The impact on the Upper Linlithgow and Union Canal preservation area will be significant and detrimental. - How can the proposals for H-LL4 (45 houses with access via Manse Road direct or via Oatland's park) H-LL7 (8 houses with access via Manse Road) be feasible? - There is also the possible impact of another access site for H-LL10 (a secondary access may be required?) which could further extends credibility on these proposals re Manse Road Where would H-LL4 access (south) join Manse Road? How could it be safe given the existing road junctions and current traffic volumes at peak times - There would be a significant and adverse impact on properties in the Riccarton Road / The Glebe area - Unlike proposals for the adjacent sites, H-LL4 does not carry the proviso under "Education" "there are capacity issues relative to Linlithgow Schools which require to addressed" An oversight surely? - How could the bridge over the canal cope with more traffic. There are already many incidents of "road rage". No proposal or alternative outlined - Local objections will be significant on these issues in the absence of clear and detailed plans I have read with interest the plans put forward by the Linlithgow Planning Forum / Linlithgow Civic Trust which are representative groups who's aspirations for Linlithgow should surely be considered in detail, in line with Mr. Hope's stated wish to work closely with such bodies. I hope that this will be done and that the Council also listens to all local feedback, which I think will support the desire for a considered and holistic approach, rather than pushing ahead with house building programmes that put an intolerable strain in Linlithgow's already poor infrastructure and diminish the quality of life for its citizens.

Before pressing the submit button please review your submission and make any changes. Once you have pressed SUBMIT you will be unable to go back to the survey.

Once we have received your submission we will send you a copy for your records. This could take up to 5 working days. If you do not receive a copy in that time please contact the Customer Service Centre.

### CONFIRMATION OF YOUR PARTICIPATION

We will send you an email notification as soon as your survey is submitted.

Please enter your email address below.