

ANNEX A - Marden Parish Council response to the MBC Call for Sites exercise 2019-2020 – Site 309

Site Reference: 309	Land North of Marden	Policy considerations		
		NPPF paragraph	Local Plan policy	Neighbourhood Plan
Principle of Development	<p>This site was originally promoted as a new ‘garden community’ but is now being promoted as a ‘Strategic Garden Expansion’. Its nature and location fail to meet the requirements in MBC’s prospectus for ‘urban extensions’ or ‘new settlements’ and does not comply as a Garden Community development. It is demonstrably neither an extension to the urban area (which in the local plan means the town of Maidstone) or a new settlement separate from an existing village. It does not knit into the Community of Marden and does not provide any net positive benefits to the existing community.</p> <p>Instead, it would rapidly become a ‘cuckoo’s nest’ development and fundamentally altering the character of Marden in a way wholly incompatible with the ‘Garden City’ principles it purports to adopt and being the complete opposite of the clear intention of the Marden Neighbourhood Plan adopted by Maidstone Borough Council as supplementary planning policy following the Referendum held in February 2020. In Marden Neighbourhood Plan the vision for Marden is to ‘Ensure that Marden will continue to be a thriving parish, to maintain its individual character, heritage and community spirit’.</p>		SS1	Vision for Marden page 4 MNP
Physical and social connectivity	<ul style="list-style-type: none"> The site does not connect to the existing village, there is only one short section that abuts the railway line, which is a physical barrier between the north the south of the Parish. The railway line is only crossed in 3 places relevant to the site <ul style="list-style-type: none"> B2079 Maidstone Road by a road bridge with very narrow footways A pedestrian bridge adjacent to Marden Station which does not connect with the Public Rights of Way network on the south side Pattenden Lane road bridge which connects the employment area with the rest of the village but is constrained by height (3.7m) <p>The pedestrian and cycle links to Marden village are poor</p> <p>Marden Neighbourhood Plan Policy In2 Support will be given to developments designed to maximise travel on foot and by cycle and that provide direct links to village facilities and public transport services via off-road and lightly trafficked routes, or through improvements for non-motorised users on busier existing routes. Developments should not hinder existing walking and cycling routes unless a convenient alternative route is provided. Major sites should be designed to provide through routes for pedestrians and cyclists where this would help improve non-vehicular access from adjacent housing or business premises and to facilitate links with any nearby public rights of way or open space.</p> <ul style="list-style-type: none"> The indicative pedestrian link over the railway is not feasible as the PROW is constrained where it crosses the church yard, so would not provide full accessible access to the village. Confirmed by South eastern Railways. It would not provide a cycleway, nor would it be easily negotiated by disabled users, buggies or prams. There is no possibility for a footway on the B2079 north of the railway on the west side as the Grade 2 listed Old Vicarage abuts the highway. The footways across the B2079 Maidstone Road bridge and through the Pattenden Lane bridge are constrained by width and could not be widened or converted into combined footways/cycleways. <p>Maidstone Local Plan Policy SP17 Development in the countryside will retain the separation of individual settlements. The new settlement will be immediately adjacent to Marden and will rely on its services and infrastructure in its early years. It will impose a large burden on the existing village and whilst the railway will always divide the settlement, the form will necessitate the usage of the two linking roads, one with a low bridge and one with a narrow carriageway and footway that is narrow and unsuitable for disabled access and for pushchairs and prams. This represents the worst of both and will not retain the separation of individual settlements.</p>	98, 182	SP5, SP9, SP17, SP23, DM1, DM21	In2

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<p>Highway and public transport considerations</p>	<ul style="list-style-type: none"> • The main roads between Marden and Maidstone, the B2079 and A229, are inadequate and any redevelopment of the existing links (both historic turnpike roads) would result in serious harm to the character of the countryside, through – for example – loss of mature hedgerows. • The A229 between Stilebridge and Linton has a poor accident record. • The B2079 is constrained by the narrowness of the road bridge over the railway and the tight T-junction with Marden High Street, the village Conservation area (HGV lorries particularly have issues manoeuvring around). • Pattenden Lane is constrained because of the restricted railway bridge headroom (3.7 m). • Hunton Road is constrained by the narrowness of the river bridge. • The only access for HGV's to Pattenden Lane is via Underlyn Lane, which is indicated as one of the access points to the site. • The A229 to the north of Linton into Maidstone is inadequate and heavily congested. Constraints mean that the planned improvements at the Wheatsheaf junction and Linton Crossroads are unlikely to cope with increasing traffic over the longer term. • The increase in traffic would be inconsistent with Air Quality Management and Clean Air Zones. • None of the rural routes south of the B2163 Heath Road have street lighting. Introduction of lamp columns would be visually harmful during daylight and night-time hours. • Road connections to the west of Marden to Paddock Wood, Tonbridge, Tunbridge Wells, Kings Hill and others are along narrow, minor country roads. Road connections to the east towards Staplehurst, Headcorn and Ashford are equally poor. • Connectivity to the motorway and trunk road network, in whichever direction, is slow and poor along country lanes. • The infrastructure Delivery Plan is not yet complete and without it the impact of a development of this size on a rural village cannot be properly understood or mitigated • No additional footpaths or cycle routes are proposed in the development plans and the network will not be improved. • Proposals to provide a footway across Maidstone Road railway bridge are unrealistic • Projected traffic flow increases along Maidstone Road would result in congestion at the railway bridge and at the T junction with Marden High Street. • Mitigation measures would not be possible at either site due to existing buildings with frontages directly onto the road • Greater use of Pattenden Lane is not possible due to the height restriction (3.7m) at the railway bridge 	102 to 104, 127, 170, 181	SP5, SP9, SP17, SP18, SP23, DM6, DM21, DM30	In2, In3

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<p>Highways and public transport considerations (continued)</p>	<p>Marden Neighbourhood Plan Policy In3 Developments within the Plan area which lead to additional traffic generation will be required to ensure that safe vehicular access arrangements are incorporated within the design of the development and be provided before the use commences. Where appropriate, traffic impact studies will be required for proposed developments and any off-site traffic mitigation measures as deemed necessary by the highway authority will be secured by agreements linked to planning permissions.</p> <ul style="list-style-type: none"> • The integrated transport strategy is not finalised and without it the impact of the traffic from this site cannot be fully understood. • Stantec report para 5.3.1 AM peak hour traffic flows estimate a three-fold increase in the existing flow along the B2079 towards Marden where constraints for safe pedestrian and cycle access have already been identified. • Marden railway station is on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near ‘standing room only’ during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached. • The bus network does not connect Marden with local employment locations such as Kings Hill, Cranbrook, Hawkhurst, Tenterden or employment areas of Maidstone such as Parkwood • There is no direct bus service to local hospitals at Pembury or Maidstone 	102 to 104, 127, 170, 181	SP5, SP9, SP17, SP18, SP23, DM6, DM21, DM30	In2, In3
<p>Character and setting</p>	<p>MBC Local Plan Adopted October 2017. 4.114 <i>Development proposals within landscapes of local value should, through their siting, scale, mass, materials and design, seek to contribute positively to the conservation and enhancement of the protected landscape. Designated areas include parts of the Greensand Ridge and the Low Weald, and the Medway, the Loose and the Len river valleys. These landscapes were highlighted as areas of local value by the public through local plan consultations.</i></p> <ul style="list-style-type: none"> • This development will pave a large area of the low weald and will impact greatly on the views from the Greensand Ridge. The landscape will be irrevocably altered. <p>4.115 <i>The Greensand Ridge lies to the south of Maidstone and is defined by the scarp face of the Ridge with extensive views across the Low Weald to the south. It is characterised by frequent small blocks of coppice and deciduous woodland, extensive orchards and frequent oast houses, with ragstone being a predominant material in walls and buildings.</i></p> <ul style="list-style-type: none"> • This development will pave a large area of the low weald and will impact greatly on the views from the Greensand Ridge. The landscape will be irrevocably altered. <p>4.117 <i>The Low Weald covers a significant proportion of the countryside in the rural southern half of the borough. The Low Weald is recognised as having distinctive landscape features: the field patterns, many of medieval character, hedgerows, stands of trees, ponds and streams and buildings of character should be conserved and enhanced where appropriate.</i></p> <ul style="list-style-type: none"> • This development will pave a large area of the low weald and will impact greatly on the views from the Greensand Ridge. The landscape will be irrevocably altered. The idealised landscape that the applicant is proposing for the green areas in the garden community do not reflect the existing landscape of the local area. 	98, 127, 170, 189	SP17, SP18, DM1, DM4, DM3, DM30	NE3, NE5, BE1

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Character and setting (continued)	Policy SP17 Countryside <i>6. The distinctive landscape character of the Greensand Ridge, the Medway Valley, the Len Valley, the Loose Valley, and the Low Weald, as defined on the policies map, will be conserved and enhanced as landscapes of local value.</i> <ul style="list-style-type: none"> The network of small hedgerows across the site will be lost. Despite the applicant stating that there will be a net biodiversity gain the reality is that a large proportion of the green areas will need to be taken up by SUDS attenuation and lagoons and will not be “usable space”. Hedgerows, single mature trees and shaws are predominant boundary feature of the site and is characteristic of the Low Weald (National Character Area Profile 121). The Staplehurst Low Weald character area has distinctive landscape features – the field patterns, many of medieval character, hedgerows, stands of trees, ponds and streams and buildings of character should be conserved and enhanced. The landscape plans that the developer is proposing for the open space areas, do not reflect the existing landscape of the local area and will irrevocably alter the existing landscape. A development of this scale would also undoubtedly cause harm to the setting of Marden’s 129 listed buildings (the largest amount in a village in the Borough of Maidstone). 	98, 127, 170, 189	SP17, SP18, DM1, DM3, DM4, DM30	NE3, NE5, BE1
	Policy SP18 The Historic Environment <i>i. Through the development management process, securing the sensitive management and design of development which impacts on heritage assets and their settings;</i> <ul style="list-style-type: none"> The proposal will cause harm to the setting of the Grade I St Michael and all Angels Church and to other Grade II properties as Church Farm House, The Oast House and The Old Vicarage (the views to and from the church are prominent in the landscape). The historic importance of these views is demonstrated in the siting of Linton House, a Grade I listed building and its associated Grade II* parkland. It is understood that any new development could be landscaped, but owing to the land levels, this would not visually screen development from the Grade I and Grade II* listed heritage assets.			
	Marden Neighbourhood Plan – Policy BE1 <i>Development proposals should be designed to protect the fabric and setting of any designated and non-designated heritage asset and respect and enhance the existing character of the village. New development must be both visually and functionally sympathetic to the existing styles and materials, which are illustrated at pages 21/22 in this Plan and also described in the Marden Design Statement (2001), in order to maintain and enhance Marden’s sense of place.</i> <ul style="list-style-type: none"> This proposal will not respect and enhance the existing character of the village as it will dwarf the existing village and introduce far too much new architecture and similar housing stock that will not enhance the existing character of the village. 			

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Fluvial and surface water flooding	The area is low lying and on heavy clay. The disposal of surface water therefore presents a challenge as infiltration of surface water is not necessarily a satisfactory solution. Discharge even if attenuated by a SuDS scheme, is still likely to increase surface water run-off into the existing drainage network, and increase the risk of surface water and fluvial flooding elsewhere, such that the area defined in the layout would be insufficient.	155, 156, 157, 158, 163, 165	DM1	NE1
	<p>NPPF paragraphs 156,157</p> <p><i>Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.</i></p> <ul style="list-style-type: none"> No representations have been sought from the internal drainage board or the Environment Agency about this proposal. Marden suffers from winter flooding and road closure and the cumulative impacts of climate change and the recent changes to the housing in our village are yet to be fully realised. 			
	<p>NPPF Paragraph 158</p> <p><i>The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.</i></p> <ul style="list-style-type: none"> More recent detailed flood and surface flood monitoring is required for Marden before any further development is discussed. Evidence from the winter 2019-2020 records suggest that many routes out of the village were impassable due to the winter flooding. Flood maps for this area are old and require updating with recent information. 			
<p>Marden Neighbourhood Plan - Policy NE1</p> <p><i>Support will be given to development proposals that include appropriate sustainable surface water control systems designed to deliver efficient, clean water handling as well as wildlife and amenity benefits. Schemes must be accompanied by a detailed management plan confirming operating responsibility to ensure the permanent management and maintenance of all elements of the schemes to maximise local benefits.</i></p> <ul style="list-style-type: none"> Information has been obtained from a chartered water/soils engineer with 45years of industry experience in development work and a Past President of the UK water engineers' professional body, CIWEM (www.ciwem.org), who has carried out some broad-brush calculations using the national SuDS design tool (www.uksuds.com), and computed that, just for the residential area proposed to the north of the school and 'local centre' on the development layout, some 20,000-25,000 cubic metres of 'total storage' would be required for the 1/100 year design flood event. If that is translated into a 0.5m depth of water, then 40-50,000 square metres of land would be required for lagoon storage (4-5ha of a 25ha development footprint, so 20% equivalent developed area); if a more probable design depth of 0.3m is used for storage capacity, then 6-8 ha would be required – much more than the defined area of 'open space' that is shown along Underlyn Lane on the layout. 				

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Ecological and biodiversity considerations	<p>Concern on Biodiversity loss is of great national concern and MBC has declared a climate emergency. This proposed site poses a number of Biodiversity risks that would not only have a severe negative impact but cause irrevocable damage to the local ecosystem.</p> <ul style="list-style-type: none"> NPPF guidelines say that <i>‘Plans should allocate land with the least environmental or amenity value, as well as identify, map and safeguard components of wildlife-rich habitats and wider ecological networks.....and they should pursue opportunities for securing measurable net gains for biodiversity’.</i> 	175	DM1, DM3	NE4
	<p>Maidstone Local Plan SP17 Countryside Policy – <i>‘seeks to refuse development that would harm the character and appearance of the countryside’</i></p> <ul style="list-style-type: none"> Marden has a unique biodiversity setting and the RSPB and The British Trust for Ornithology (BTO) highlights the existence of red-listed bird species on the site and surrounding farmland including turtle doves, yellow hammers and linnets. BTO ringing data indicates that the immediate area holds a significant proportion of these birds. <p>DM3 – Natural Environment – <i>‘Areas of Ancient Woodland and designated Sites of Importance for Biodiversity (SSSIs) should protect and enhance the natural environment... by incorporating measures such as protecting Ancient Woodlands’</i> and NPPF <i>‘development on land within or outside an SSSI, and which is likely to have an adverse effect on it, should not normally be permitted and the development resulting in the loss of deterioration of irreplaceable habitats (such as Ancient Woodland) should be refused unless there are wholly exceptional reasons.’</i></p>			
	<p>Marden Neighbourhood Plan – Policy NE4 BIODIVERSITY AND HABITATS <i>Owing to the unique setting of Marden in its surrounding landscape all new development is expected to support actively the aims of the Kent Biodiversity Strategy, to protect Priority Habitats and, where possible, contribute to the Biodiversity Opportunity Areas. A biodiversity net gain philosophy should be implemented so that any habitat or species loss is replaced elsewhere on-site, in excess of the amount originally lost. Local off-site re-creation is viewed as a last resort, but the net gain principle would apply to ensure there is a positive impact from the new works.</i></p> <ul style="list-style-type: none"> The RSPB National and Area Team has advised that the Turtle Doves in particular would be significantly impacted by the development and as they are a red-listed species this harm could be great and irreversible “We have been overwhelmed by the sheer amount of passion and enthusiasm there has been within the Marden community to save this iconic species. From farmers creating areas of feeding habitat (in most cases on a voluntary basis) to local people carrying out breeding bird surveys to help us monitor the Turtle Dove population in and around Marden. We do however have concerns that this great work could be undermined with the proposed 2000 homes in Marden, we believe that this could potentially lead to habitat fragmentation as well as increasing disturbance to Turtle Doves. The RSPB are committed to continue its work in order to save Turtle Doves in Marden and across Kent”. Bridgehurst Woods is connected via a large matrix of high-grade habitats directly to Marden Meadows SSSI (less than 500m) and the River Beult (an SSSI) lies less than 2000m from the site boundary. Both SSSIs could be put at risk by changes to the water table and dust from construction. The habitats, which are all managed for nature include lowland mixed broadleaved woodland, lowland meadows, hedgerows, a network of ponds and an area of wet woodland and these habitats are Kent Biodiversity Action Plan priority habitats. They are interdependent and intersecting in terms of the species that live there and recent monitoring has recorded many species that are nationally or locally rare and also species of principal importance in England. This site is almost entirely zoned by Natural England as Network Enhancement Zone 1 and lies completely within the impact zones of both Marden’s SSSIs. Natural England’s “Impact Risk Zones” for SSSIs state ‘Emissions from any type of development can cause air pollution and/or dust affecting the habitat and species on SSSIs.’ 			

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Ecological and biodiversity considerations (continued)	<ul style="list-style-type: none"> As noted under “Character and Setting” above, hedgerows, single mature trees and shaws are predominant boundary features of the site, the majority of which have been present for more than 200 years, and many are likely to meet the important criteria of the Hedgerow Regulations 1997 and fail other biodiversity tests. This biodiversity would be lost with such an inappropriate development and the developer has not yet published the environmental work necessary to show what the biodiversity loss would be on the site and surrounding area. 	175	DM1, DM3	NE4
Education, Health and Youth	<ul style="list-style-type: none"> As noted under ‘Physical and Social Connectivity’, there is very limited pedestrian and cycle access to the site from the village centre. Therefore, pedestrian access to the proposed health hub or schools from the existing settlement would be almost impossible. This constraint would hinder access to the existing village facilities, such as the medical centre, dental surgery, primary school and pre-school playgroup from the site. Educational facilities in the area would be inadequate for the size of development if land on the site is allocated instead to employment. There are no longer any provisions or facilities for young people as a result of public spending cuts. There are difficulties reaching Maidstone and Pembury Hospitals and the surrounding secondary schools, especially during peak hours and on public transport. Any large-scale development south of the Greensand Ridge would only worsen the existing situation and would prove increasingly unattractive to potential residents of the site when combined with the ‘baseline’ development allocations in the current Local Plan. 	78, 84, 91, 94	SP5, SP9, DM1, DM20	A1, A3, A4
Employment	<ul style="list-style-type: none"> There are limited local employment opportunities in Marden, and as noted above both car and public transport options for those seeking to work in Maidstone are likely to remain poor. Stantec report para 7.3.21 ‘the main fundamental issue with the siter remains its location and reliance on commuting for most trips to work or higher order services’ Some employment opportunities may exist in Tonbridge, Tunbridge Wells or Ashford, but commuting to London by train is likely to be the only choice for many. Marden railway station is on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near ‘standing room only’ during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached. Other large-scale housing developments in Staplehurst, Headcorn, Ashford and East Kent will also be putting increasing pressure on train capacity in future years. 	78, 84	SP5, SP9, DM1	In4, E1
Retail and Leisure	<ul style="list-style-type: none"> As noted above, there is poor connectivity with the existing retail and leisure options available to residents of Marden. Facilities in the town of Maidstone would be similarly difficult for potential residents of the site to access except by car, and even then, increasingly so during peak periods when the combined impacts of current and future developments in the locality add to existing pressures. However, this site is also unlikely to have the ‘critical mass’ to support any retail or leisure options within the development itself. 	78, 84, 92, 182	SP5, SP9, DM1, DM20	A1, E2

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Utilities	<ul style="list-style-type: none"> Electricity <ul style="list-style-type: none"> Marden experiences frequent power cuts during thunderstorms. Impact of additional demand on the existing electrical supply network Gas: No known issues. The Transco pipeline traverses the site, but no mention is made in the proposals. <p>Marden Neighbourhood Plan – Policy In1 <i>WATER SUPPLY AND SEWERAGE The provision of new and improved water supply and sewerage infrastructure to serve the needs of existing and new developments in the Plan area will be supported, subject to other policies in the Plan.</i></p> <ul style="list-style-type: none"> Water: South East Water has an ongoing programme to renew and strengthen its existing network, but it is not clear whether this will offer the capacity to deal with the individual and cumulative impacts of additional large-scale housing developments. Sewers: The sewerage system in Marden was already under great strain, even before the recently completed housing developments and those currently being completed. Frequent problems occur at the pumping stations which connects the village with the Horsmonden wastewater treatment works. The existing sewer network also surcharges during periods of heavy rainfall, causing significant health concerns. All these problems would be exacerbated by any further large-scale housing development. Landline: No known issues. Broadband: Ultrafast fibre broadband is becoming available in parts of Marden, but bandwidth problems are common with standard and superfast broadband. Mobile: No 5G coverage in Marden. 4G coverage is variable, depending on network and exact location. 	112, 149	DM1, ID1	In1
Conclusion	<p>Site 309 is considered unsustainable and unsuitable for housing development because.</p> <ul style="list-style-type: none"> The development offers no benefits to the existing community and would cause irreversible harm to the community Stantec report para 7.5.6 ‘The key risk is that this site does not appropriate knit into the community of Marden and that benefits are not realised’. The developer will be unable to mitigate this risk because the railway prevents connectivity to the existing community This is not a garden community proposal and fails to meet the definitions of garden community. The proposal does not conform to many of the requirements of the NPPF, Maidstone Local Plan 2017, Marden Neighbourhood Plan 2020 Vehicular access into and out of the site, and through and around the village, would cause significant impacts at a number of locations The A229 to Maidstone is already heavily congested, and connections to other large towns and the motorway / trunk road network are along narrow, minor country roads The environmental and ecological impacts would cause irreversible harm There are inadequate primary and secondary education facilities for a development of this size, particularly if land within the site were devoted to employment instead of education. There are limited employment opportunities in Marden, with both car and public transport options for those seeking to work in Maidstone likely to remain poor Commuting to London by train is likely to be the only option for many, but services are already full during peak periods – with no prospect of increased capacity – and this can only worsen with further housing developments The water, sewerage and electricity systems in Marden are already under great strain, even without any further housing developments. <p>Overwhelming community opposition to the proposal</p>	72, 78, 84, 91, 92, 94, 98, 102 to 105, 112, 127, 149, 155, 158, 163, 170, 175, 189, 181, 182	SP5, SP9, SP17, SP18, SP23, DM1, DM3, DM4, DM6, DM20, DM21, DM30, ID1	NE1, NE3, NE4, NE5, BE1, In1, In2, In3, In4, A1, A3, A4, E1, E2