Submission to the Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030

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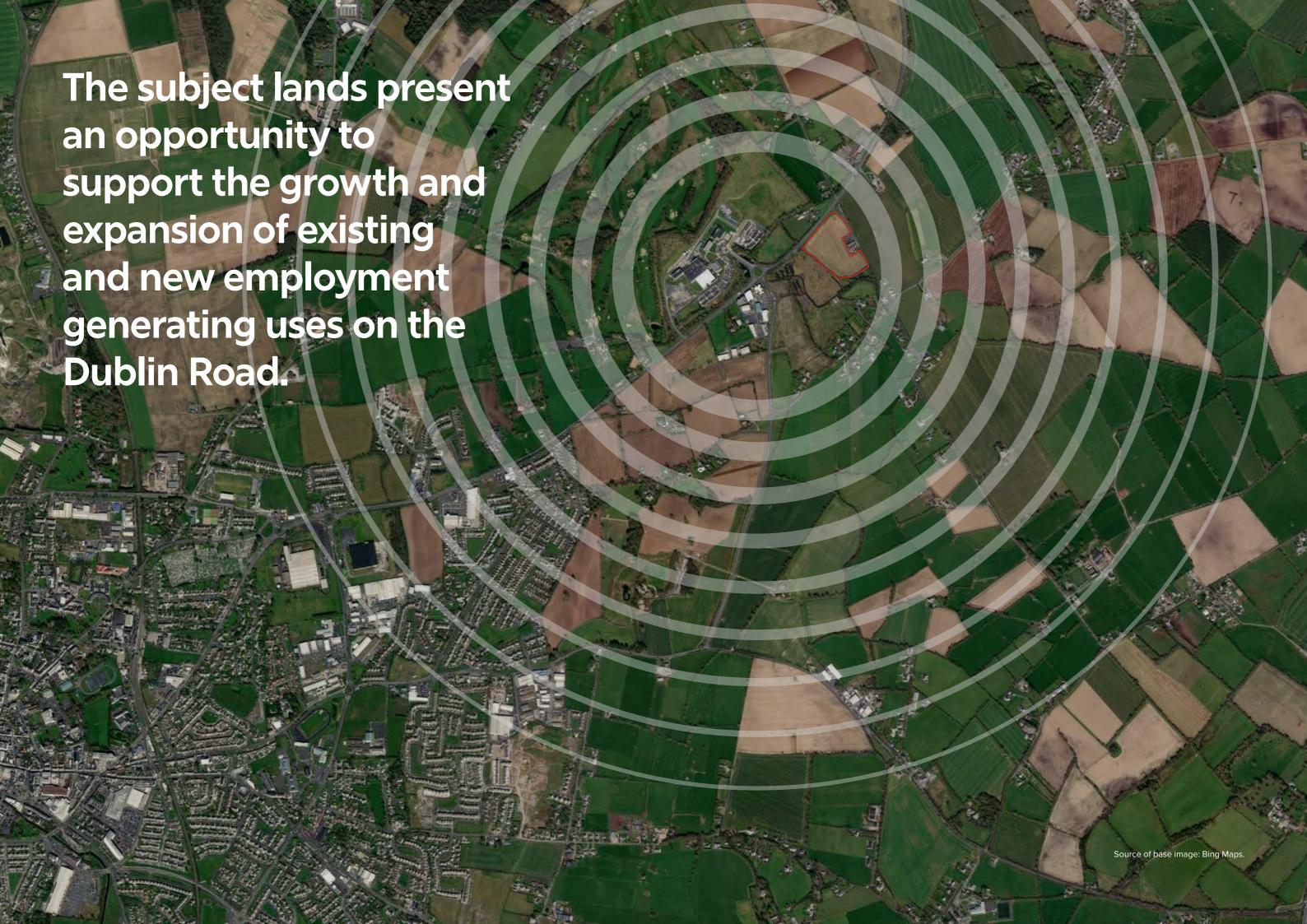


Table of Contents

i Executive Summary

1.0	Introduction	06
2.0	Site Location and Urban Context	80
3.0	Submission and Town Planning Case	11
4.0	Conclusion	22



Executive Summary

01

Purpose of this Submission

The purpose of this submission is, namely, to seek the:

Rezoning of the lands at Dublin Road from their existing 'Community/Education', to 'Objective G - Enterprise and Employment' or 'Objective J - Industry'.

02

Lands' Strategic Location

The lands are underutilised and provide a major opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road within the boundary of the Greater Carlow area.

In our professional planning opinion, appropriate rezoning of the underutilised lands at Dublin Road will serve to realise the policies and objectives of the Carlow County Development Plan 2022-2028 and the Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030.

03

Why is the proposed Rezoning Appropriate?

In our opinion, the currently proposed zoning of the subject lands (Community/Education) in the Draft Plan is inappropriate at this location. It is an anomaly in what is otherwise considered an area for industry, enterprise and employment.

Land uses surrounding the subject site include pharmaceutical/industry uses (Merck Sharp and Dohme) to the north west and enterprise and employment uses at Deerpark Business Complex to the south west.

Having reviewed the Draft Plan and Land Use Zoning Map 12.1, all other Community and Education zoned lands are located within the urban core and are proximate to existing/proposed residential development.

We therefore, request the zoning at the subject site is amended from Community and Education to "Industry" or "Enterprise and Employment" use to complement and consolidate the existing enterprises operating in the area.

In our opinion, rezoning of the Lands at Dublin Road Avenue to 'Objective G - Enterprise and Employment' or 'Objective J - Industry' is appropriate and in accordance with the proper planning and sustainable development of the Town.

In summary the rezoning:

- 1. Enables the realisation of the aims and objectives of the Development Plan and the Draft Joint Plan;
- 2. Supports existing business allowing expansion and cluster:
- 3. Is supported by Policy at National, Regional and Local Level;
- 4. Is in accordance with relevant Guidelines: and
- 5. Will assist Carlow to support existing businesses and promote sustainable growth.

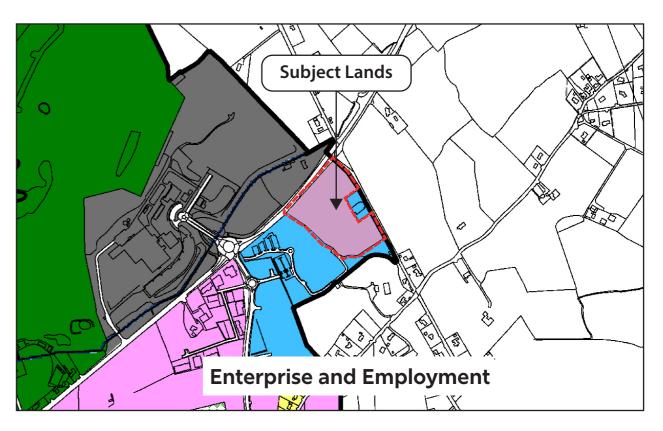
Existing Zoning

The Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 identifies the lands as being zoned 'Community/Education' which aims "To protect and provide for community and educational facilities".

Subject Lands

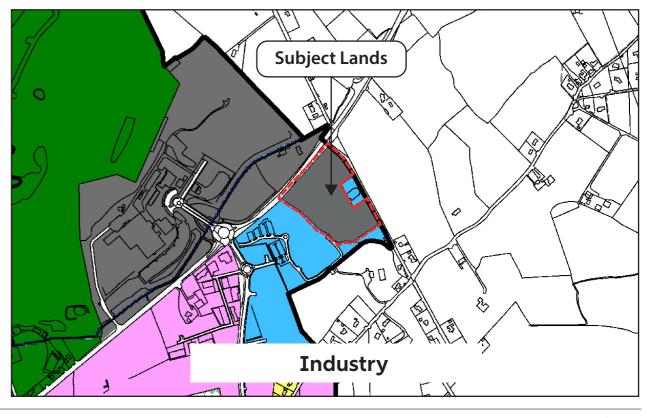
What we seek

In the Amended Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030, we seek that the subject lands are zoned 'Objective G - Enterprise and Employment' or 'Objective J - Industry'.





OR



01.

Introduction

Senior Executive Officer Planning Department Carlow County Council Athy Road Carlow R93 E7R7

> Monday, 5 February 2024 [By Online Portal]

Dear Sir/Madam

RE: SUBMISSIONTOTHE DRAFT CARLOW-GRAIGUECULLEN JOINT URBAN LOCAL AREA PLAN 2024-2030 IN RESPECT OF LANDS AT DUBLIN ROAD, CARLOW

1.0 Introduction: Submission to Secure More Appropriate Zoning

1.1 Amendment to Plan Sought

Mr Michael Quinn¹ has instructed Purser² to make a submission in respect of the Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 in relation to lands at Dublin Road, Carlow. (See Figure 1.1 (inside cover) and 1.2.) (For the purposes of this Submission, the Lands are identified as "The Dublin Road Lands".)

The subject lands (approximately 4.5 hectares / 11 acres in size) are strategically located close to key employment centres including MSD, approximately 4 kilometres from Carlow Town Centre and located on one of the main arterial routes of the Town – R448, Dublin Road providing rapid access to the Town and also the M9 via Junction 4.

1.2 Purpose of this Submission

The purpose of this submission is, namely, to seek the:

Rezoning of the lands at Dublin Road from their existing 'Community/Education' zoning to 'Objective G - Enterprise and Employment' or 'Objective J - Industry'.

The subject lands present an opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road. The Draft Joint Urban Local Area Plan and the Carlow County Development Plan must ensure that sufficient lands are zoned to support economic development in Carlow Town and that zoned lands are **located appropriately** in order to complement and support existing enterprise and to allow employment generating hubs/clusters to be established.

The purpose of this submission is, namely, to seek the:

Rezoning of the lands at Dublin Road from their existing 'Community/ Education', to "Objective G - Enterprise and Employment' or 'Objective J - Industry'.

Mortarstown Lower, Carlow, R93 X7P4.

^{2 20} Harcourt Street, Dublin 2, D02 H364.

02.

Site Location and Urban Context

2.0 Site Location and Urban Context

2.1 A Strategic Landholding Located on the Dublin Road

The subject lands (approximately 4.5 hectare / 11 acres in size) are strategically located close to key employment centres including MSD, approximately 4 kilometres from Carlow Town Centre and located on one of the main arterial routes of the Town – R448, Dublin Road providing rapid access to the Town and also the M9 via Junction 4. (Figure 2.1.)

The site is highly accessible, located on the eastern approach to Carlow Town adjacent to MSD, which is one of Carlow's major employers.

The lands are underutilised and provide a major opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road within the boundary of the Greater Carlow area.

In our professional planning opinion, rezoning of the underutilised lands at Dublin Road will serve to realise the policies and objectives of the Carlow County Development Plan 2022-2028, the Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 and support existing enterprise and to allow an employment generating hub/cluster to be established in a highly effective business location.

In summary the Lands:

- 1. Lie adjacent to established employment generating uses and should be used to support the growth and expansion of existing and new enterprise.
- 2. Promote sustainable travel being strategically located adjacent to the R448 that partly includes a dedicated cycle lane providing easy access to Carlow Town Centre.
- 3. Facilitate the development of an employment generating cluster positioned to complement and support the enterprise eco-systems in the Town. (See Figure 2.2.)
- 4. Provide easy access to the M9 Motorway.

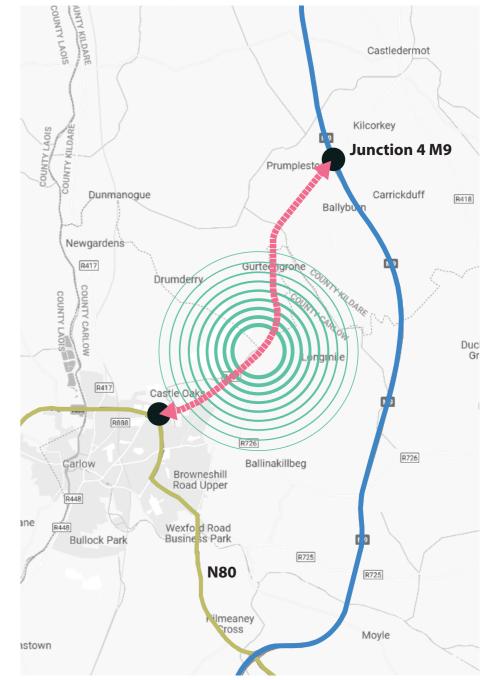
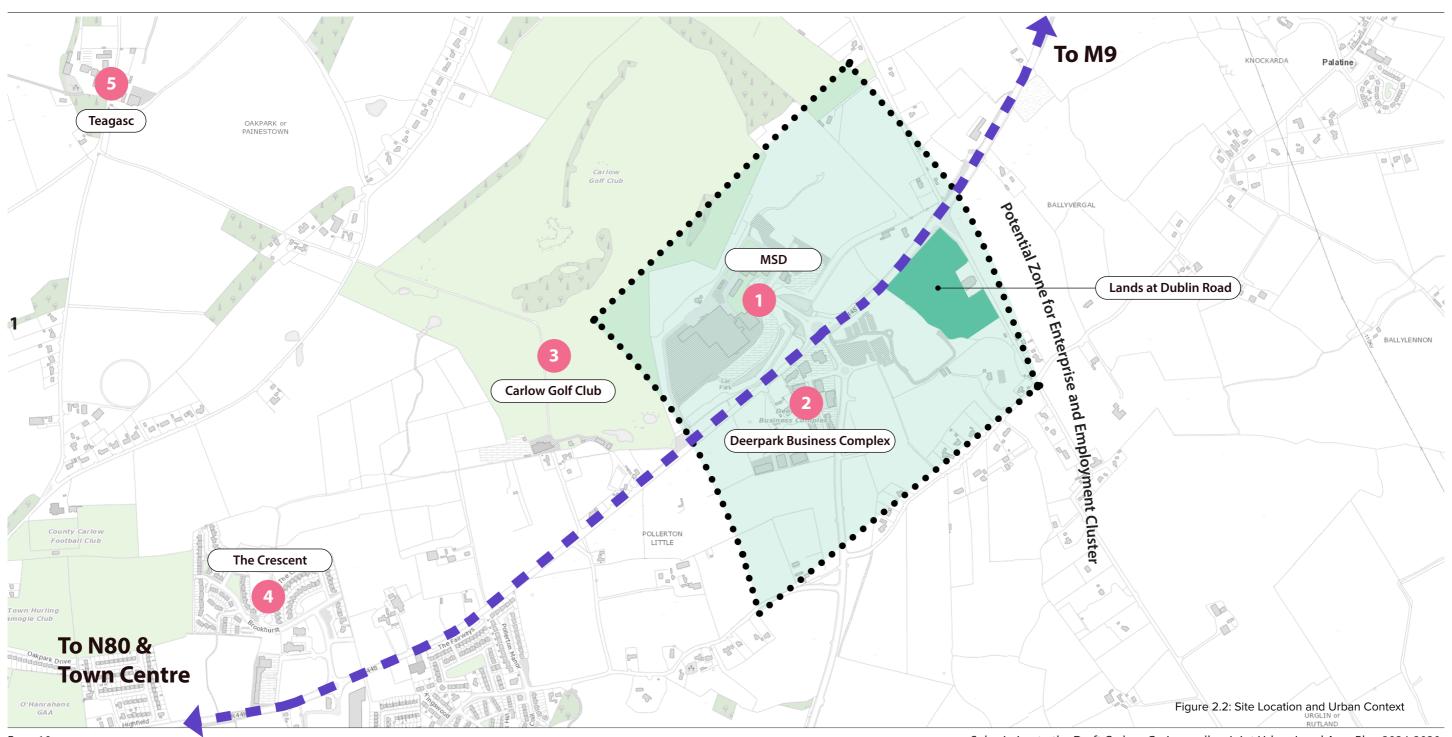


Figure 2.1: Subject Site in Context of Strategic Road Network



03.

Submission and Town Planning Case

3.0 Purpose of this Submission and Town Planning Case

3.1 Overview

The Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 is intended to set the planning parameters for the future development of the County including the subject lands at Dublin Road Carlow.

3.1.1 Existing Zoning is Inappropriate – 'Community/Education'

The Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 identifies the lands are being zoned 'Community-Education' (also see Figure 3.1 below). The 'Community-Education' zoning objective aims "To protect and provide for community and educational facilities". (See Figure 3.1 below.)

In our opinion, the lands' existing zoning objective is not in accordance with the Vision of the Draft Joint Urban Local Area Plan:

"To ensure that Carlow-Graiguecullen maximises and builds on its Key Town designation, strategic accessible location, regional and inter-regional connectivity, and existing inherent strengths, prioritising quality of life considerations, the economic and employment potential of the town centre led urban regeneration, focusing on a low carbon and compact pattern of development, while seeking to conserve and enhance the town's existing natural and built heritage assets."

3.1.2 Education

The Draft LAP describes the primary and post-primary education facilities in the town and notes the recent expansion of Tyndall College to 10,000sqm floorspace and the recent planning approval provided to St Mary's Academy CBS for new school facilities on lands adjoining their existing grounds.

The LAP acknowledges the following in relation to school place requirements:

"In principle, it is anticipated that an increase in school place requirements resulting from projected population growth will be mitigated by a corresponding decline in school place requirements arising from underlying demographics. However, in accordance with the principle of compact growth at least 30% of all new homes to be built in Carlow-Graiguecullen are to be built within the existing built-up footprint of the joint urban area. Arising from same increased

pressure for additional school places may arise Therefore, the existing school sites and land buffers around them will be of critical importance as it may be necessary to extend the existing schools to meet any increased requirements."

To this end, we note that adequate provision of primary and post-primary school facilities can be provided for within existing school grounds and no additional land is required to fulfil educational use requirements during the lifetime of the LAP.

3.1.3 Alternative Sites for Community and Education Use

We contend that the location of the Community and Education zoned lands at the subject site is located a considerable distance from any significant residential areas or existing/future populations to support community/education uses.

Several alternative sites located within the Former Carlow Town Council Boundary and identified in Chapter 12 (Map 12.2) of the Draft LAP, could readily support Community and Education uses, these include:

3 no. Settlement Consolidation Sites (identified as CW8, CW9 and CW 10 under the Draft LAP):

- Former Greenvale Site
- Barrow Track Site
- Pembroke Sites (2 no.)

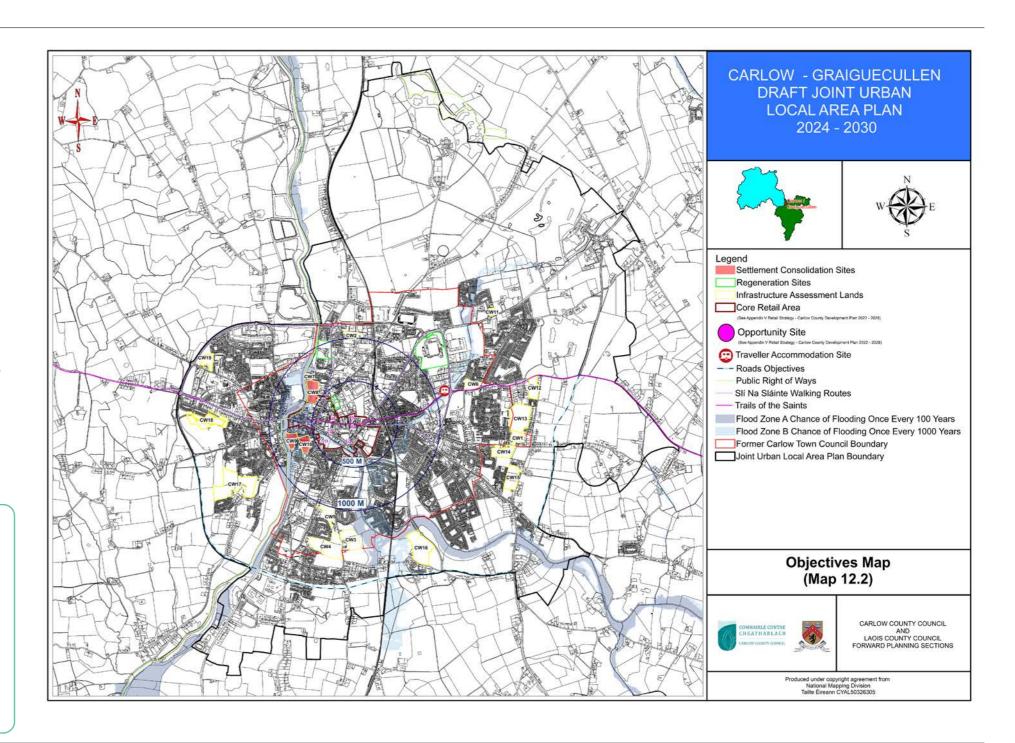
3 no. Regeneration Sites:

- Crotty's Site
- Court Place Site
- Former Braun Site
- Kelvin Grove Site

Notwithstanding the above listed sites, Infrastructure Assessment lands, which assess the suitability of lands for future development have been earmarked under the Draft Plan for future development (Sites CW1-CW19 under Chapter 12 Map 12.2 refer). These sites which include the settlement consolidation sites could support future demand for community or education uses arising under the life of the Plan 2024-2030.

The Community and Education zoned lands at the subject site on the Dublin Road are an anomaly in what is otherwise considered an area for industry, enterprise and employment.

We conclude that the Community and Education zoned land at the subject site should therefore be located near the urban core and aforementioned settlement consolidation sites, regeneration sites and infrastructure assessment lands as identified under the Draft Plan.



3.1.2 What We Seek - 'Objective G - Enterprise and Employment' or 'Objective J - Industry'

We seek that the subject lands are zoned to 'Objective G - Enterprise and Employment' or 'Objective J - Industry' Zoning in the Amended Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030. (See Figure 3.1.)

The objective of 'G - Enterprise and Employment' Zoning' is "To promote and provide for the development of enterprise and employment generating uses."

The Draft Joint Urban Local Area states:

"This zoning provides for the creation of enterprise and employment uses apart from traditional commercial functions that should locate within a town or village core area. Lands zoned for 'Enterprise and Employment' include the use and development of land for high-end research and development, business, science and technology-based industry, financial services, call centres/telemarketing, software development, enterprise and incubator units, small/medium manufacturing, corporate offices in high quality campus/park type development. This zoning also provides for 'walk to' support facilities such as canteen, restaurant or crèche services which

are integrated into employment units and are of a nature and scale to serve the needs of employees on the campus."

The objective of 'J - Enterprise and Employment' Zoning' is "To provide for industrial development and ancillary office use."

The Draft Joint Urban Local Area states:

"This zoning provides for general and specialised industrial uses, associated with high inputs of energy, water and materials and the management of environmental emissions including noise, dust, and odour. Other uses ancillary or similar to industrial uses will be considered in this zone on their merits."

3.2 Why is the Proposed Rezoning Appropriate?

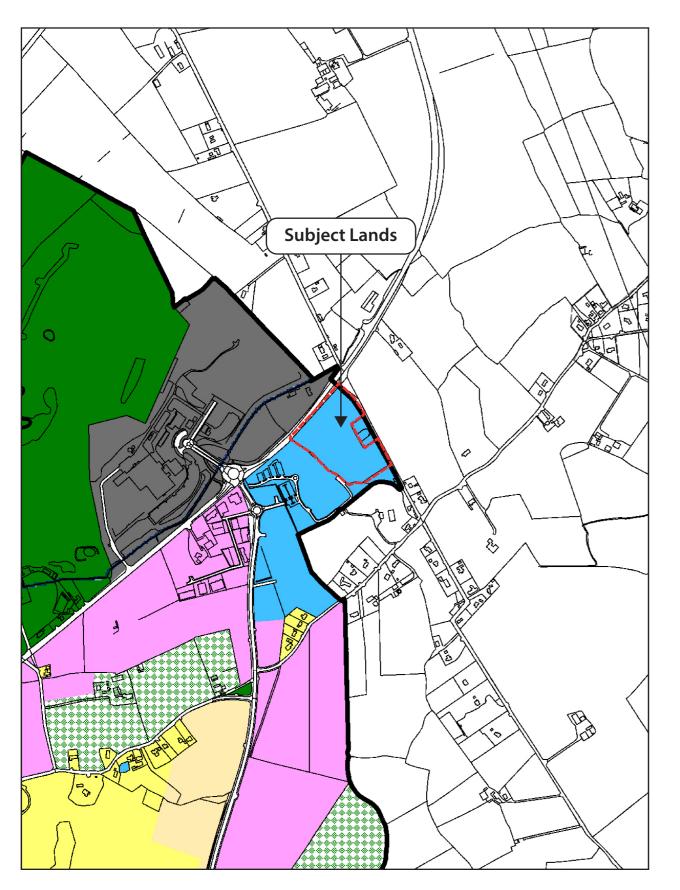
In our opinion, rezoning of the Lands at Dublin Road Avenue to 'Objective G - Enterprise and Employment' or 'Objective J - Industry' is appropriate and in accordance with the proper planning and sustainable development of the Town.

In summary the proposed rezoning:

- 1. Enables the realisation of the aims and objectives of the Development Plan and the Draft Joint Plan;
- 2. Supports existing business allowing expansion and cluster;
- 3. Is supported by Policy at National, Regional and Local Level;
- 4. Is in accordance with relevant Guidelines; and
- 5. Will assist Carlow to support existing businesses and promote sustainable growth.

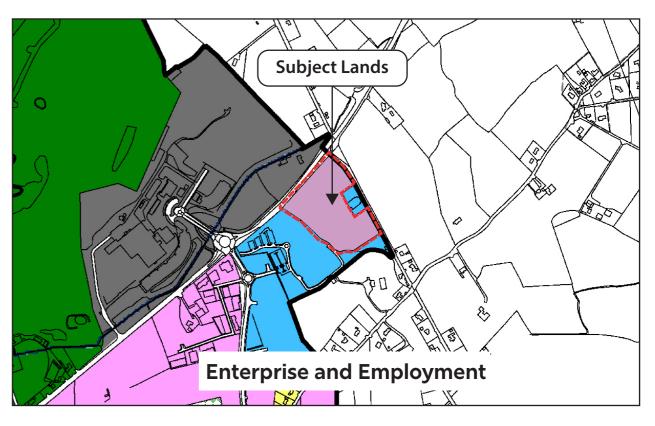
Existing Zoning

The Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 identifies the lands as being zoned 'Community/Education' which aims "To protect and provide for community and educational facilities".



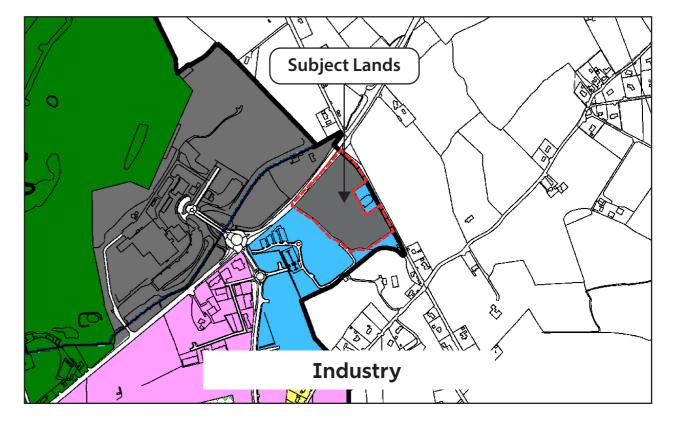
What we seek

In the Amended Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030, we seek that the subject lands are zoned 'Objective G - Enterprise and Employment' or 'Objective J - Industry'.









3.2.1 Rezoning enables the realisation of the aims and objectives of the Development Plan and the Draft Urban Local Area Plan

The overarching aim of the County Development Plan emphases that Carlow Town is the principal centre of economic activity in County Carlow and one of the larger Key Towns in the Southern Region. It has many economic attributes such as its third level education provision and other educational institutes, proximity to Dublin, the River Barrow, tourism, retail services and cultural facilities.

It outlines that the Town has a role as a major employment, retail and services centre. Development of Carlow Town as a regional and inter-regional growth driver will require a significant increase in job opportunities to sustain the existing and growing population.

The proposed rezoning will enable Carlow Town to remain as an inter-regional growth driver, supporting the creation of jobs and enterprise in the County.

The Development Plan includes a number of Policies and Objectives, which support the rezoning of the subject lands as set out in Table 3.1 below.

Policy/Objective	How the Proposed Rezoning Supports Delivery
ED P2: Protect land zoned for employment-generating uses from inappropriate development that would negate future economic activity.	Rezoning of the subject lands would ensure that sufficient lands are available in a key enterprise location in Carlow Town, facilitating
ED O1: Ensure that an adequate supply of land is zoned and located within the development boundary of settlements to support economic development and employment generating uses, at a scale appropriate to the size and role of the settlement as per the Settlement Hierarchy.	economic activity over the Plan period. The Development Plan and other statutory plans must not only ensure that an adequate supply of zoned land is available to support economic development but it must be also be provided in appropriate locations, such as the Lands at Dublin Road, which can benefit from adjacent established employment generating uses and a high-level of accessibility.
ED O3: Facilitate innovation and development through the development of business park and enterprise hub solutions which are positioned to complement and support the enterprise eco-systems in the County.	Rezoning of the underutilised lands at Dublin Road will support existing enterprise and to allow an employment generating hub/cluster to be established in a highly effective business location.
ED P4: Maximise the economic potential of Carlow by building on its locational advantage along the M9 and N80 and promoting and marketing the Key Town of Carlow for significant economic investment.	The subject lands at Dublin Road benefit from easy access to the M9 and the N80. In order to promote Carlow and attract significant economic investment, the Development Plan must include sufficient lands zoned for enterprise and employment and those lands must be provided in the right locations.
ED P5: Promote Carlow Town as a regional and inter regional economic growth centre, through the expansion of existing enterprise ecosystems and support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations.	Rezoning of the Lands at Dublin Road will enable the expansion of existing enterprise ecosystems and support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment uses.
ED P6 : Promote clustering and spin off sectors arising from the existence of a number of multinational corporations within Carlow Town.	Rezoning of the subject lands at Dublin Road will promote clustering and spin off sectors arising from the existence of multinational corporations within the Town.

Table 3.1: Policy Objectives and how the Proposed Zoning Accords.

3.2.1.1 Priority Sectors

The Development Plan states:

"From a sectoral perspective the Plan aims to support and facilitate the economic development of the County across a broad range of sectors while acknowledging, in particular priority sectors identified in The InCarlow Economic Development and Business Support Strategy for County Carlow.

The Strategy identifies a range of sectors which demonstrate competitiveness and opportunity within County Carlow. Some of the sectors are recognised as having potential due to their relative size and clusters which have already been developed, while others are competitive due to their significant growth potential and links to wider sectors.

It is acknowledged that considerable opportunities exist for job creation and economic growth in areas such as green tech and new technology developments."

The Table opposite, extracted from the Draft Development Plan sets out the Priority sectors for County Carlow.

	Sector
Focus and Step Change	Financial Services ICT Engineering Technology Firms Tourism
Sustain and Grow	Agri-Tourism Pharma Transportation
Monitor and Intervene	Retail (Town Regeneration) Green Energy

The Development Plan includes the following Policies:

PS P1: Facilitate the development of enterprises including those related to the identified sectors of growth at appropriate locations and facilitate the provision of infrastructure and facilitates that will enable clustering and specialisation in the County.

PS P2: Identify and pursue opportunities for enterprise growth, innovation and diversity within the priority sectors, including the potential of enterprise ecosystems in sectors identified in the Regional Enterprise Plans (REPs) and their successors.

In our professional planning opinion, the proposed rezoning enables the delivery of Policies PS P1 facilitating enterprise growth at appropriate locations and PS P2 enable within the priority sectors, including the potential of enterprise ecosystems, respectively.

3.2.1.1 Rezoning enables the realisation of the aims and objectives of the Draft Urban Local Area Plan

The Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 states:

"The strategy to support economic development will be achieved by:

- Providing the infrastructure and zoned land necessary to attract economic development in recognition of the status of Carlow-Graiguecullen as a Key Town.
- Protecting zoned land for employment generating uses from inappropriate development that would negate future economic activity.
- Promoting Carlow-Graiguecullen as a self-sustaining regional and inter-regional economic growth centre.
- Recognising the strong and functional economic ties between Carlow Town Centre) and Graiguecullen.
- Maximising existing economic assets as outlined in Table 4.1.
- Prioritising sectors likely to support significant economic growth in Carlow-Graiguecullen, including construction

and manufacturing, commerce, professional services, and retail.

 Supporting all forms of employment generation subject to compliance with proper planning and environmental considerations..."

In our professional planning opinion, the proposed rezoning enables the realisation of the aims and objectives of the Draft Urban Local Area Plan.

3.2.2 Rezoning supports existing business – allowing expansion and clusters to develop

As outlined above, a number of policies in the Draft Development Plan aim to protect existing business and allow for expansion and business clusters/hubs to emerge.

Strong clusters and hotspots facilitate best practicesharing between companies and are a key factor in driving operational and research excellence including practitionerto-practitioner knowledge sharing.

Indeed Enterprise 2025 seeks to build on Ireland's strengths and seek out new opportunities for clustering, collaboration and connections.

We set out below an extract from an Irish Times Article entitled Creating clusters will act as an engine for growth by Grainne Millar Thu, Sep 8, 2016:

"Ireland's national enterprise policy, Enterprise 2025, aims to promote inter-organisational collaboration in the form of clusters in key sectors of the economy such as agri-food, engineering, ICT, life sciences and the audio-visual film and animation sector.

It seems like a welcome development, given that similar cluster policies have proved successful across the world. In the US, Harvard Business School's impressive Cluster Mapping project, indicates that 51 traded clusters form the engine of its economy.

Closer to home the majority of EU member states have cluster policies in place to strengthen collaboration and co-operation between industry and research, support the SME eco-system and internationalisation. These cluster initiatives have been fuelled in part by EU policy and targeted funding programmes to promote economic development through clusters of regional specialisation."

It is clear from the above that promotion of clusters, including the appropriate zoning of land, act as an 'engine' for growth and could allow Carlow Town to take advantage of the presence of an already impressive list of multi-national and indigenous companies.

3.3.3 Rezoning is supported by Policy at National, Regional and Local Level

In our professional planning opinion, the proposed rezoning is supported at a National, Regional and Local Level.

3.3.3.1 National Planning Framework

The National Planning Framework (NPF) sets out the planning policy approach for economic development at a national and regional level. A strong economy supported by enterprise, innovation and skills is a national strategic outcome of the NPF.

It acknowledges that this will require creating places that can foster enterprise and innovation, attract investment, support opportunities to diversify with associated investment in infrastructure, including digital connectivity, and in skills and talent to support economic competitiveness and enterprise growth.

In our opinion, the proposed rezoning fully accords with the NPF.

3.3.3.2 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (RSES)

The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development to sustainably grow the Region to 2031 and beyond.

The RSES states:

"The Region has strong concentrations and/ or large employers in Biopharma, ICT, Food and Engineering sectors. There is a cohort of internationally successful Irish owned enterprises involved in engineering, serving a range of markets such as automotive, medical devices, and agri-tech. From records of state enterprise development agencies, a number of sectors displaying high levels of productivity can be identified, such as ICT related (services, facilities and consultancy), Machinery and Equipment, Electrical Equipment and Chemicals."



The economic vision for the region is to enable sustainable, competitive, inclusive and resilient growth. The RSES seeks to achieve this vision through a number of economic principles, including clustering. It states:

"Clustering: These are initiatives that create, maintain, or upgrade an economic stronghold, by strengthening linkages or facilitating collective action to improve the cluster-specific business environment. Modern cluster policies aim to put in place a favourable business ecosystem for innovation and entrepreneurship in which new players can emerge and thus support the development of new industrial value chains and emerging industries...

...the State can play a facilitative and supportive role. There is potential to further strengthen collaboration and clustering activities between foreign and Irish owned enterprises, and between enterprises, Higher Education Institutions (HEIs), and the research base."

In our professional planning opinion, the proposed rezoning, including its ability to create an enterprise and employment cluster is fully in accordance with the RSES.

3.3.3 Regional Enterprise Plan for the South East Region to 2020

The Regional Enterprise Action Plan is developed around five key strategic objectives focused on enhancing the existing environment for enterprise and activity, establishing the South-East as a 'learning region' and a place of choice for talent and investment.

In our opinion, the proposed rezoning enables the realisation of the Regional Enterprise Plan by enhancing the existing environment for enterprise and ensuring that Carlow has the capacity to attract talent and investment.



3.3.5.1 Planning Must Allow Business to Thrive and Promote Job Creation

In an ever-competitive global economy, it is important the planning policy aids the creation of an environment that promotes enterprise and job creation.

In a recent Article in the Irish Times entitled "Planning system threatens State's reputation abroad, says IDA¹"

We set out an extract from the Article below:

"IDA Ireland, which is the State agency tasked with attracting foreign direct investment, said on Monday that "an efficient planning system is extremely important to Ireland's economic competitiveness".

"Multinational investors require certainty in relation to the timelines for delivery of their planned capital projects," said a spokeswoman. "IDA Ireland fully supports the need for appropriate checks and balances within Ireland's planning processes."

"However, in recent years the efficiency of Ireland's

https://www.irishtimes.com/business/economy/planning-system-threatens-state-s-reputation-

planning system, particularly the protracted nature of the judicial review process, has become an area of reputational risk to the State."

"In an increasingly competitive international marketplace, this has the potential to hinder IDA Ireland's efforts to attract significant overseas investors."

"It may also present an additional obstacle to expansion and second-site investments from existing multinational clients."

Although the article make reference to Judicial Review and the associated challenges it poses to business development, it does also highlight the need for Development Plans and Policy to include sufficient and appropriately located land use zoning that economic development in Carlow Town and complement and support existing enterprise.

abroad-savs-ida-1.4685093

04.

Conclusion

4.0 Conclusion

4.1 Opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road

In conclusion, the purpose of this submission is, namely, to seek the rezoning of the lands at Dublin Road from their existing 'Community-Education' zoning, to 'Objective G - Enterprise and Employment' or 'Objective J - Industry' Zoning.

The subject lands present an opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road. The Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 (and the County Development Plan) must ensure that sufficient lands are zoned to support economic development in Carlow Town and that zoned lands are located appropriately in order to complement and support existing enterprise and to allow employment generating hubs/clusters to be established.

This subject lands are strategically located occupying prominent roadside frontage along the Dublin Road (R448) at the northeastern end of the joint urban area. It represents a significant opportunity to consolidate enterprise and employment development at this location, which is to the

immediate south of MSD Carlow, and on a primary approach to the joint urban area from the Eastern and Dublin regions. The land is also within easy access of M9 Junction 4.

We trust that due consideration will be given to the role of the subject site in the overall future development of Carlow, that this submission will be taken into consideration in preparation of the Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030, and would welcome receipt of submission.

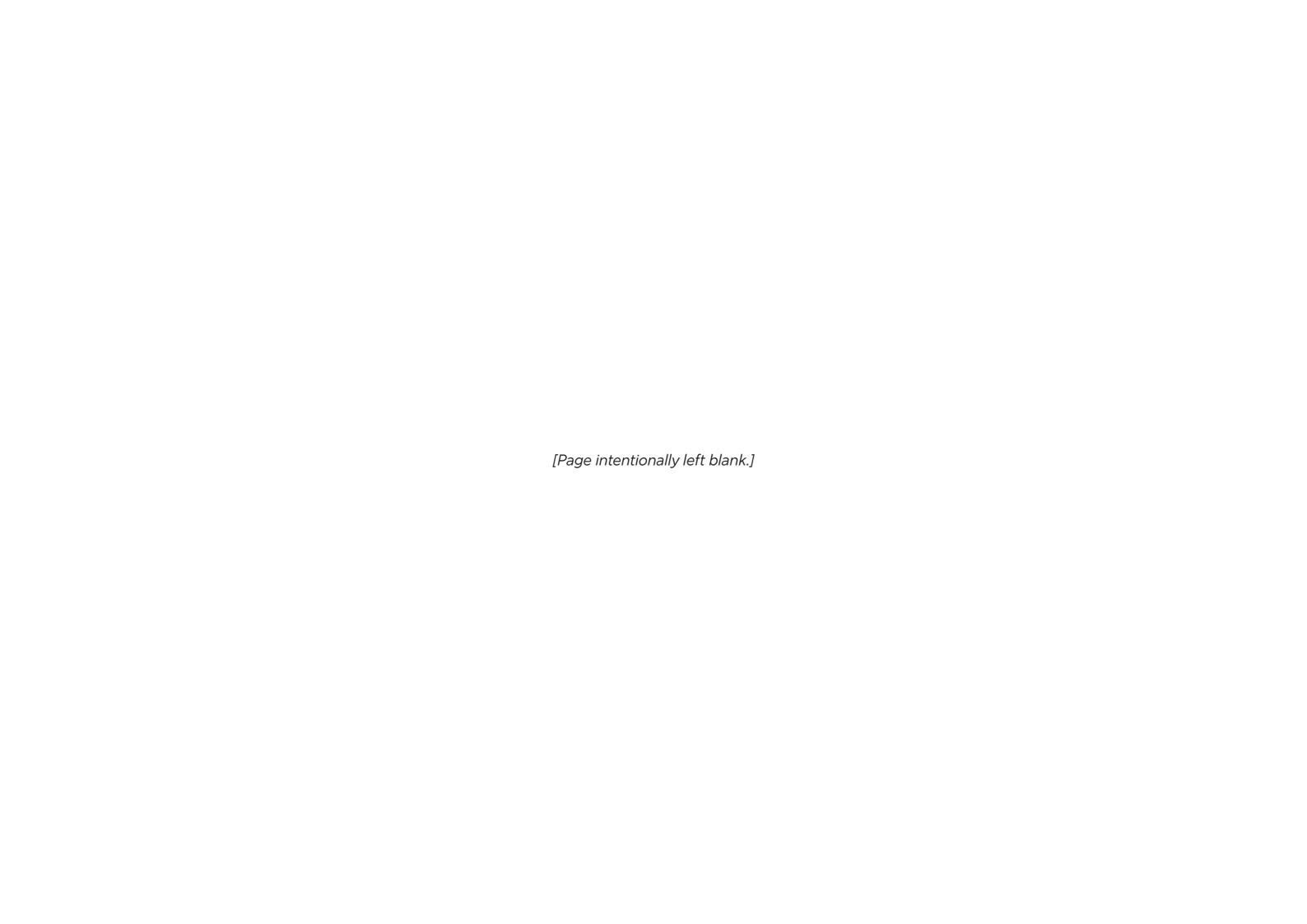
We would be happy to clarify any issues arising, if considered appropriate by the Planning Authority, and would welcome the opportunity to work with you and your fellow Councillors, to secure these objectives.

Yours faithfully

Seamus Donohoe Managing Director

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