

	<h1>Variation No.6</h1>
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Who are you:	Private Individual
Name:	Dunmoy Properties Ltd
Reference:	VAR6-155604
Submission Made	January 16, 2026 3:58 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Chapter 1 – Proposed Variation No. 6
- Chapter 3 – Proposed Variation No. 6
- Chapter 6 – Proposed Variation No. 6

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Dunmoy - Blessington Zoning Presentation Jan 2026.pdf, 4.06MB



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PROPERTIES LIMITED

WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028
PROPOSED VARIATION NO. 6

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Executive Summary

A Practical, County-Wide Approach to Delivering Homes

Meeting housing delivery targets across County Wicklow requires not only sufficient land to be zoned, but confidence that zoned lands can and will deliver homes within the lifetime of the Development Plan and Local Area Plans. Experience to date indicates that, in several locations across the County, significant portions of residentially zoned land face constraints that limit their ability to come forward in the short to medium term. These include fragmented or non-developer ownership, infrastructure deficits, environmental and remediation requirements, and complex enabling works that extend delivery timelines well beyond the current Plan period.

This presentation proposes a more proactive and pragmatic approach to residential zoning — one that complements existing planning policy while improving certainty around housing delivery. Blessington is used as a detailed case study within the body of the presentation to illustrate how, notwithstanding the quantity of land currently zoned, only a proportion of these lands are realistically capable of delivering homes before 2031. Similar challenges can be identified in other settlements across the County.

To address this, two key proposals are advanced:

✓ **Early landowner engagement as part of the zoning process**

Introducing structured engagement with landowners of existing and proposed residentially zoned lands would provide clarity on whether sites are capable of being activated within the Plan period. This common-sense step would help align zoning decisions with realistic delivery timelines, reduce long-term inactive land banks, and provide greater transparency and fairness for landowners.

✓ **Targeted zoning of serviced, deliverable lands to support immediate housing supply**

Where analysis demonstrates that existing zoned lands are unlikely to meet housing targets within the Plan period, the zoning of additional, appropriately located and fully serviced lands should be considered. This approach supports compact, plan-led growth and gives the Council greater certainty that housing targets can be achieved without reliance on constrained or long-term sites.

Together, these measures offer a sensible and solutions-focused way to strengthen housing delivery across County Wicklow. They do not require the de-zoning of existing lands but rather enhance the effectiveness of the zoning framework by prioritising deliverability, infrastructure readiness and timely activation. The Blessington case study demonstrates how this approach can work in practice, providing Members with a clear opportunity to support housing delivery outcomes that are achievable within the lifetime of the current Development Plan.

Re-zoning Process Approach

Selection of Lands – Issues Identified

Experience to date suggests that the selection of lands for residential zoning has not always been informed by a comprehensive assessment of key planning considerations.

In particular, insufficient weight appears to have been given to:

- The practical and pragmatic likelihood of development given constraints such as topography, access, services, etc.;
- Ownership of land and the likelihood of housing delivery within the Plan period;
- The logical and sustainable growth of the existing townscape.

As a result, lands are being zoned that we feel are less likely to be developed within the lifetime of the LAP / County Development Plan, raising concerns regarding:

- Under-zoning even when Priority 1 & Priority 2 lands are taken into account;
- Distortion of settlement growth patterns;
- Unintended financial and regulatory consequences for landowners.

Proposed Improvement to the Re-Zoning Process

If the Council, as part of any re-zoning process, were to engage directly with landowners of lands proposed for residential zoning, (even lands that are already zoned, or were zoned in a previous plan) this engagement would afford the opportunity for landowners to state explicitly and commit to submitting their lands for planning for the minimum density of housing as a minimum, this would significantly reduce the zoning of land which never actually gets developed.

This engagement would:

- Confirm whether landowners are willing and, in a position, to bring lands forward for development within the Plan period;
- Avoid the re-zoning of active agricultural lands, large private gardens or other lands where residential development will not happen within the life of the LAP / County Development Plan.

This approach is particularly important given the Residential Zoned Land Tax (RZLT) and other tax and compliance implications arising from residential zoning.

A more collaborative and evidence-based approach would support:

- Deliverability of zoned lands;
- Fairness to landowners;
- More coherent, compact and plan-led settlement growth.

The Wicklow “Call for Sites” questionnaire provides a useful starting point for informing zoning decisions as part of LAP / CDP process. However, its current scope is limited and does not adequately allow landowners to set out the wider planning context, site-specific merits, or contribution of individual sites to coherent housing delivery and townscape integration.

Re-zoning Process Approach

Proposed Amendments to Variation No. 6

It is suggested that Variation No. 6 could be strengthened by incorporating a clearer mechanism to support the effective delivery of all lands zoned for residential use.

In this context, the following approach may be considered:

- **Review of existing zoned lands:**
Prior to the zoning of any additional lands for residential use, it may be beneficial to undertake a comprehensive review of larger parcels of land already zoned for residential development. The purpose of this review would be to better understand the likelihood of these lands being developed in the short to medium term. As part of this process, initial engagement with landowners could assist in informing realistic assessments. This exercise would not be intended to lead to de-zoning, but rather to ensure that residential zoning targets are aligned with the potential for delivery within the lifespan of the current LAP/CDP.
- **Future zoning review:**
Where lands are currently zoned residential, or proposed to be zoned residential under Variation No. 6, and where no planning application is submitted during the lifetime of the current County Development Plan, it may be appropriate for such lands to be reviewed as part of the next Land Use Zoning process, with a view to reassessing their zoning objectives at that time.

This approach would:

- Encourage the **timely activation** of zoned lands;
- Ensure that residential zoning is focused on lands **capable of delivery**;
- **Prevent the long-term retention** of residential zoning on lands that are not intended or suitable for development.

Rationale for the Amendment

Residential zoning should be **plan-led, infrastructure-informed** and **deliverable**, in line with national and regional planning policy.

The proposed amendments to the process would:

- ✓ Align zoning decisions with **realistic housing delivery within the Plan period**;
- ✓ Reduce the unnecessary inclusion of lands that contribute to **over-zoning**;
- ✓ Provide **clarity and transparency** to landowners and the wider community regarding the expectations associated with residential zoning.

When combined with early landowner engagement and awareness of RZLT implications, this measure would support a **more efficient, fair and evidence-based zoning process**.

**Examples of Large and Very Large Sites In Wicklow Currently Zoned
Residential with low probability of development in the life of the current
CDP/LAP**

Unlikely to be Developed in Short to Medium Term

Existing Zoned Lands Unlikely to be Developed in Short Term

The Fassaroe lands – 65Ha zoned Residential (36Ha), Active Open Space and Open Space – house not only a quarry but a Construction & Demolition (C&D) Waste Recovery Facility. These lands will require significant remediation both environmentally and quarry restoration prior to any development commencing. These lands have been on sale since May 2024 with no prospective purchasers identified.

The asking price of these lands is high enough to mean only the largest developers are positioned to acquire such a large landbank and all of those, if they are publicly listed (Cairn, Glenveagh, etc.) or funded primarily by third party private equity capital (Ballymore, etc.) will be unlikely or unable to purchase these lands by virtue of the requirement to have an EPA licence and EPA approval in advance of any sale. As such, whilst the Council may wish to see these lands developed, it is likely that this will only happen if WCC or the LDA is the purchaser.

While the Fassaroe lands are frequently referenced in discussions on future housing supply, it is important to be realistic about delivery, timelines and the scale of development envisaged. Any development is explicitly dependent not only on firstly dealing with a very substantial land remediation but also major enabling infrastructure that is not yet in place, including high-capacity public transport, strategic road connections, and comprehensive active-travel links.

Recent planning decisions in the wider Fassaroe area have highlighted the risk of car-dependent sprawl in the absence of confirmed transport delivery, reinforcing the need for an infrastructure-first approach. In addition, the lands are subject to significant environmental and technical constraints, including proximity to protected habitats, complex hydrology and flood-risk considerations, steep topography, and the presence of established industrial and waste-related activities that raise amenity and traffic concerns.

Taken together, these factors mean that, notwithstanding long-term zoning objectives, the Roadstone Fassaroe lands are unlikely to contribute meaningfully to housing supply in the short term and should not be relied upon to address immediate housing pressures within the life of the current LAP/CDP.



Unlikely to be Developed in Short to Medium Term

7

Existing Zoned Lands Unlikely to be Developed in Short Term

Doran's Pit, Blessington (12Ha) is a further example of an active quarry zoned for development and still within Roadstone's ownership. This site is zoned Mixed Use. Furthermore, it is a Specific Local Objective in the Blessington LAP (SLO4) that this is a key priority site in Blessington due to proximity to the Town Centre.

However, even in comparison to Fassaroe, this site is less likely to deliver housing in the short term as it carries a similar remediation cost and yet, local land values and housing prices are materially lower than those in the wider Bray / Greystones area. As a former quarry, the lands would require extensive and expensive works, including ground stabilisation, infilling, environmental remediation, and comprehensive drainage and flood-risk mitigation, all of which must be completed in advance of construction. These remediation costs, when combined with the need for substantial upfront investment in road access, water and wastewater services, and site-wide infrastructure, render the current mixed-use zoning economically unviable for near-term housing delivery.

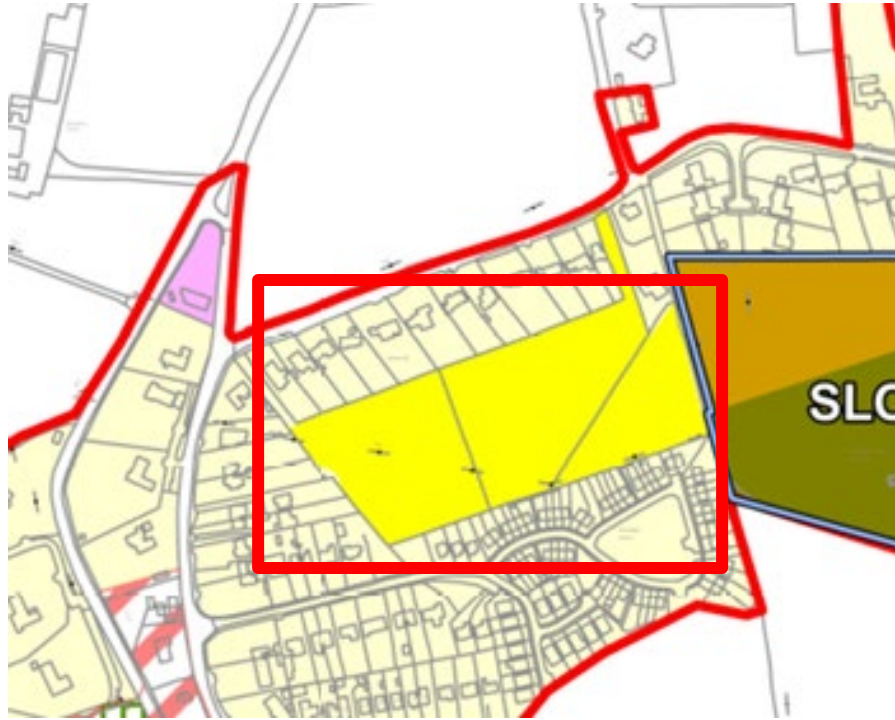
In addition, the site would require a fully master-planned and phased development strategy, supported by detailed technical, environmental and infrastructural assessments, before any planning application could reasonably be progressed. While a draft concept layout was included as part of the recent LAP process, certain critical site constraints — particularly in relation to topography and levels — do not appear to have been fully reflected, limiting the practical constructability of the illustrative scheme. Furthermore, the delivery of the link road connecting the N81 to the Kilbride Road / Knockieran Bridge would be required in advance of any development being occupied or brought into use, representing a significant enabling infrastructure dependency. When considered alongside the ongoing operational status of the quarry, land ownership considerations, and the complexity of coordinating infrastructure delivery across a large mixed-use site, there remains considerable uncertainty regarding delivery timelines. Taken together, these factors indicate that, while Doran's Pit may offer long-term regeneration potential, it is unlikely to come forward for development within the life of the current Plan and should not be relied upon to meet immediate or short-term housing delivery objectives.

There are inherent risks involved in the prioritisation of these quarry sites for Residential Delivery within the lifetime of the current Development Plan. Without significant economic support from the Government for the remediation works (e.g. incentives / grants), **these sites are not currently economically viable for residential property development.**

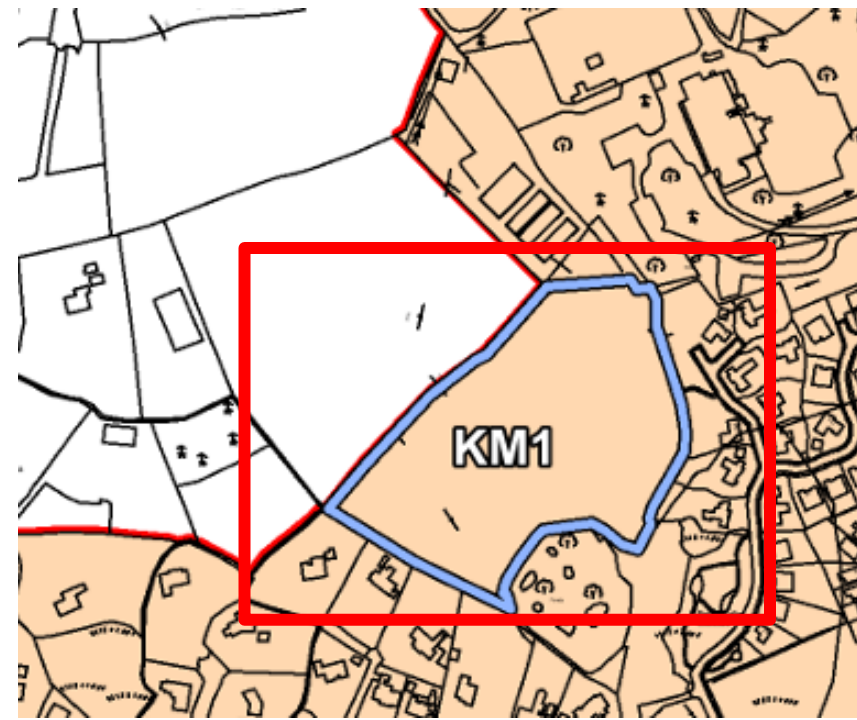


Unlikely to be Developed in Short to Medium Term

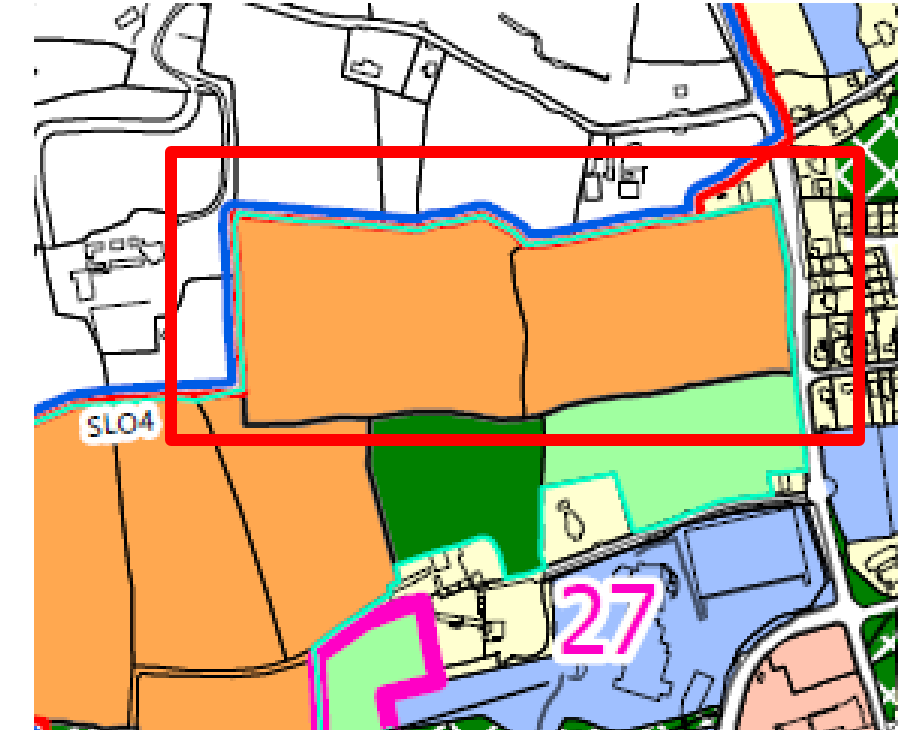
Existing Zoned Lands Unlikely to be Developed in Short Term



These lands in Enniskerry (3.35Ha) have been zoned residential since 2018, and to date there have been no planning applications submitted (not since 1999) for residential development.



These lands in Kilmacanogue (2.32Ha) have been zoned residential since 2018, and to date there have been no planning applications submitted for residential development.



These lands in Greystones (8.46Ha) forming part of currently proposed SLO4 in the current draft of the Greystones-Delgany Local Area Plan have been zoned residential since 2013, and to date there are still no planning applications submitted for residential development.

Proposed Variation No. 6: Impact on Blessington

Blessington Zoned lands – Likelihood of Build

- Under the current Local Area Plan for Blessington, it is acknowledged that Wicklow County Council has indicated that no additional lands are required to be zoned. The preceding slides, however, set out suggested process enhancements, including early engagement with landowners to establish whether existing large residential land banks are likely to be activated in the short term to deliver much needed housing.
- The slides that follow build on this approach by providing a detailed, site-specific assessment of residentially zoned lands in Blessington, including consideration of ownership, constraints and overall deliverability. This analysis offers additional context to the existing zoning position and indicates that, notwithstanding the quantum of land currently zoned, the capacity of these lands to contribute meaningfully to housing delivery within the lifetime of the current LAP may be limited.
- In this context, it is considered that, while there is no suggestion that any lands in Blessington should be de-zoned, the zoning of additional, appropriately located lands may be necessary if Wicklow County Council and the Government are to achieve housing delivery targets for the town within the life of the current Plan.

Settlement	Units under construction (Q3 2025)	Units permitted not commenced	Units permitted (appeal/JR)	Zoned land no live permission (ha)	Est. capacity (no live permission) (units)	Phase 1 / Priority 1 (units)	Phase 2 / Priority 2 (units)	Est. capacity serviced/serviceable (no live permission) (units)
Blessington	664	142	0	46	1,583	1,082	501	0 / 0

Blessington Zoned lands Under Current LAP

- SLO1:**
- Lands are divided into multiple folios each in separate Private Ownership the earliest being 1950;
 - Not Yet Serviced;
 - Requires significant infrastructure upgrades before development of housing can commence;
 - Zoned Residential since 2013 with no planning yet submitted.
 - Lands actively for sale with no purchasers identified

SLO2

New Paddocks

SLO8

- SLO4:**
- In Roadstone Ownership since 1972;
 - Still an active Quarry;
 - Requires significant infrastructure upgrades;
 - Zoned Residential since 2013 with no planning yet submitted

SLO9

OP9

- SLO5:**
- In private Ownership since 1972;
 - Zoned Residential since 2013 with no planning yet submitted

SLO10

Dunmoy Lands that could deliver immediate housing if zoned appropriately

- SLO6:**
- In Ownership of WCC since 2010
 - Planning Achieved on site in 2022; Expires 2027; no building commenced due to construction costs.

- SLO7:**
- In private Ownership since 1972;
 - Zoned Residential since 2013 with no planning yet submitted;
 - Cannot be activated until SLO6 is developed.



Blessington Zoned lands – Likelihood of Build

LAP Land Ref	Zoning	Folio No	Ownership	Site area Ha	Servicing Status	Housing Potential @35uph (Minimum Density)	Planning Status	Likelihood of Development pre 2031	Likelihood of Development pre 2031 No.	Coment
SLO1 - Parcel 1	R2 & CE	WW6057	Private Owner 1	4.2	Serviceable	147	None	Low	0	In same Family ownership since c.1990, with no planning applications submitted. Lands zoned Residential since 2013
SLO1 - Parcel 2	R2 & OS1	WW37210F	Private Owner 2							In private ownership since 2014 with no planning submitted to date. Lands zoned Residential since 2013
SLO1 - Parcel 3	R2, OS1 & OS2	WW2475	Private Owner 3							In private ownership since 1950 with no planning submitted to date. Lands zoned Residential since 2013
SLO1 - Parcel 4	OS1 & OS2	WW2479	Private Owner 4							In private ownership since 1990 with no planning submitted to date. Lands zoned Residential since 2013
SLO2	R1, CE & AOS	WW28494F	Cairn Homes Ltd	21.8	Serviceable	763	Planning Granted - Expires 13/10/2030: 325 Resi Units	High	763	
SLO4 - Dorans Pit	TC	WW2654	Roadstone Ltd	12	Serviced	420	None	Low	0	In the ownership of Roadstone since 1972 - no residential planning applications have been submitted. Zoned Proposed Residential from 2013-2019, and Mixed Use in the 2025 LAP
SLO5	R2 & T	WW3006	Private Owner	5.6	Serviced	196	None	Low	0	In same Family ownership since c.1972, with no residential planning applications submitted. Lands zoned Residential since 2013
SLO6	R1 & TC	WW34900F	Wicklow County Council	3.6	Serviced	106	Planning Granted - Expires 27/03/2027: 106 Resi Units	Low	0	In the ownership of WCC since 2010, planning granted since 2022 with no actioned or commenced development on site. Planning expires in 15 months. Zoned residential since 2013.
SLO7	R2 & OS2	WW1538F	Private Owner	3.6	Serviced	126	None	Low	0	In private ownership since 1975 with no planning submitted to date. Lands zoned Residential since 2013
SLO8	R1	WW2527	Sordino Ltd & Private Owner	2.4	Serviceable	69	Planning Granted - Expires 16/11/2030: 69 Resi Units	High	69	
SLO9	R1, CE & AOS	WW38064F	Glenveagh Ltd	5.4	Serviced	269	Planning Granted - Expires 31/03/2030: 269 Resi Units	High	269	
SLO10	R1	WW11950	Embankment Plastics Ltd	1.3	Serviced	45.5	None	Medium	45.5	In the ownership of Embankment Plastics - a production company with no known development experience. Lands unsuitable for housing given industrial surroundings. Lands zoned Employment since 2013, and residential since 2025. No planning submitted to date.
New Paddocks	R2	WW10473	Belgard Estates Ltd	1.1	Serviceable	38.5	None	Medium	38.5	In the ownership of Belgard Estates since 2023. No planning submitted to date. Formerly Roadstone lands. Possible remediation works required. Lands zoned Resi since 2013.
OP9	TC	WW11238	Private Owner	1.04	Serviceable	36.4	None	Medium	36.4	In private ownership since 2022. Planning recently refused for commercial use on site. Site zoned Town Centre since 2013. No residential planning submitted to date.
				62.04		2,216			1,221	

- Only **50%** of zoned lands are in the ownership of a housing Developer the remaining 50% are in private or non property developer ownership.
- Likelihood of actual housing delivery pre-2031 is only c. 1,221 of the potential 2,216-unit potential (**55%**) on current zoned lands.
- All lands with high likelihood of development are located in either Central Blessington or on the Blessington Demesne lands.
- The only lands south of Blessington likely to be built, with a medium ranking due to a non-developer land-owner, will only deliver a maximum of 45.5 units, and has additional parking requirements outlined in the LAP, which will reduce the area for development on this site (SLO10).
- Dunmoy Burgage Lands could provide c.480+ homes within the lifetime of the current LAP, making up for the deficit that will result from this land zoning strategy.

Burgage Lands – Your Opportunity to change the entrance to South Blessington



Dunmoy lands in Blessington (Folio WW1752F) shown here. These lands are to the South of the town and are on both sides of the N81. These lands total 17.03 Hectares, of which 12.04 Hectares are currently zoned “Existing Residential”, “Employment”, “Utility”, and “Agricultural”.

Dunmoys’ strategic land holding offers exceptional potential to address much needed housing to the south of the town.

The Dunmoy Blessington Lands are:

- ✓ **Fully serviced;**
- ✓ **In single developer ownership;**
- ✓ **Not constrained by fragmented landholdings;**
- ✓ **Capable of immediate planning progression.**

At a minimum density of 40 units per hectare (as set in Variation No. 6, Chapter 6: Housing – Table 6.1), the site can deliver:

- 480+ new homes;
- A mix of family housing and smaller units aligned with Blessington’s role as a Self-Sustaining Growth Town.

This single site could deliver a substantial number of the required Core Strategy allocation for Blessington increasing the likelihood of deliver of targets from 55% to 77%

Dunmoy – Blessington Land Holding

14

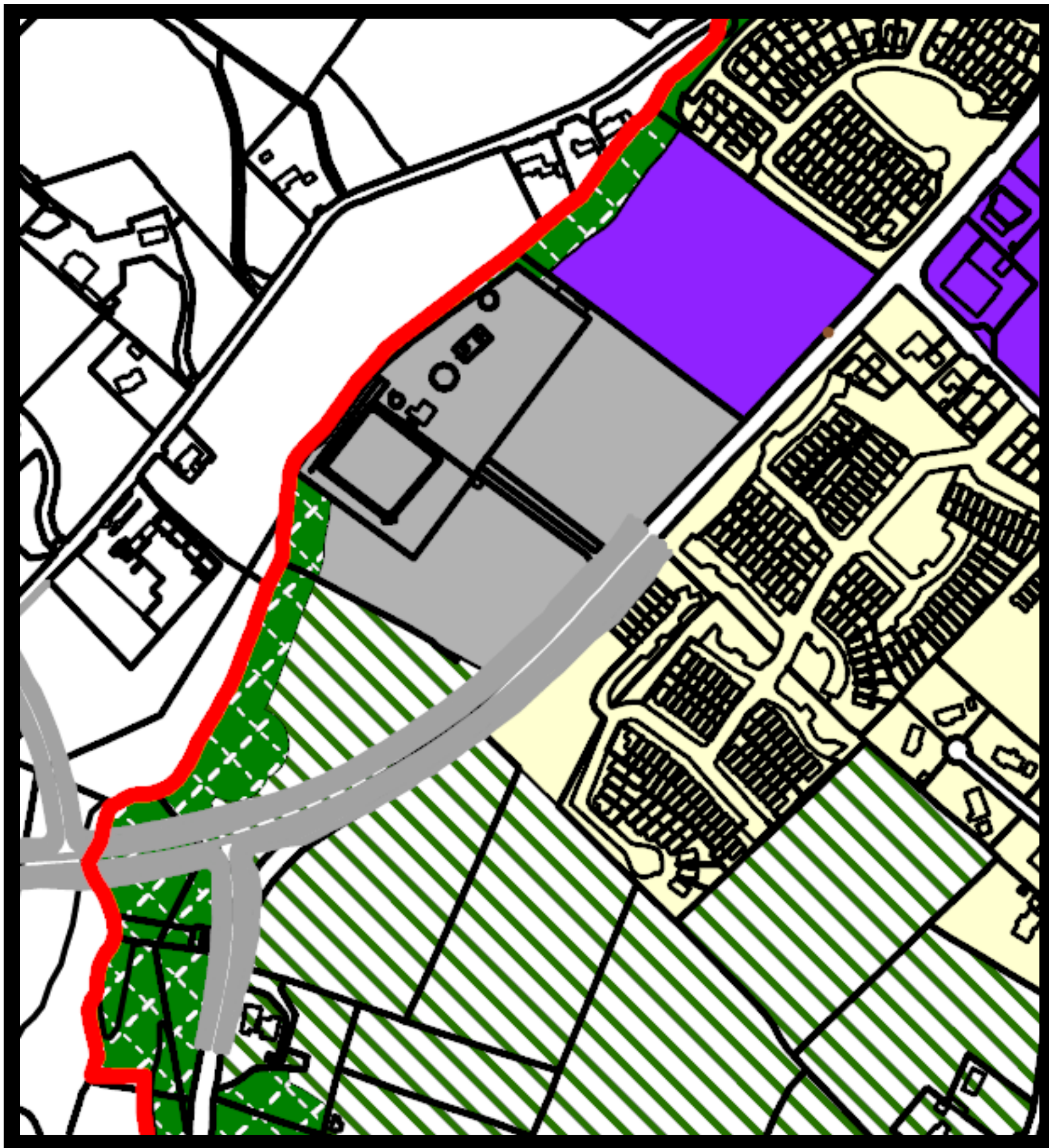
In addition to the Blessington Co. Wicklow lands, we also own a strategic 6.6 acre site on the Kilmalum Road (in red). Joined with our Blessington lands, Dunmoy's landholding represents a strategic landbank offering exceptional potential for both Wicklow County Council and Kildare County Council for several reasons:

- ✓ Dunmoy Properties Ltd has analysed the existing capacity of the WWTP, and commissioned a report by Barrett Mahoney Consulting Engineers (we are happy to provide this report, should you require it). The WWTP currently occupies 1.8 hectares, with the capacity to support up to 9,000 PE. We consulted with the local engineer to assess the need for extra land for future expansion. The engineer confirmed that future expansion provisions are already accounted for, and the plant could accommodate a PE of approximately 15,000 within its existing footprint with only a capital investment in additional machinery capacity required.
- ✓ The Blessington Local Area Plan 2025-2031 (WCC) denotes a proposed Active Travel route via our Blessington lands with the purpose of eventually, in conjunction with WCC, KCC and Dunmoy, providing a link bridge over the Deerpark Stream and opening access onto the Kilmalum Road for the benefit of all stakeholders and the wider Blessington community.
- ✓ This proposed access route will reduce congestion in Blessington at the Kilmalum Roundabouts and N81 Roundabouts – Specifically future congestion with the opening of the new school directly across from our Kilmalum Lands.

The Dunmoy Blessington Landholding now totals **19.52 Hectares** and are zoned “Existing Residential”, “Employment”, “Utility”, “Agricultural”, and Rural lands.



LAP Zoning vs Dunmoy Proposal



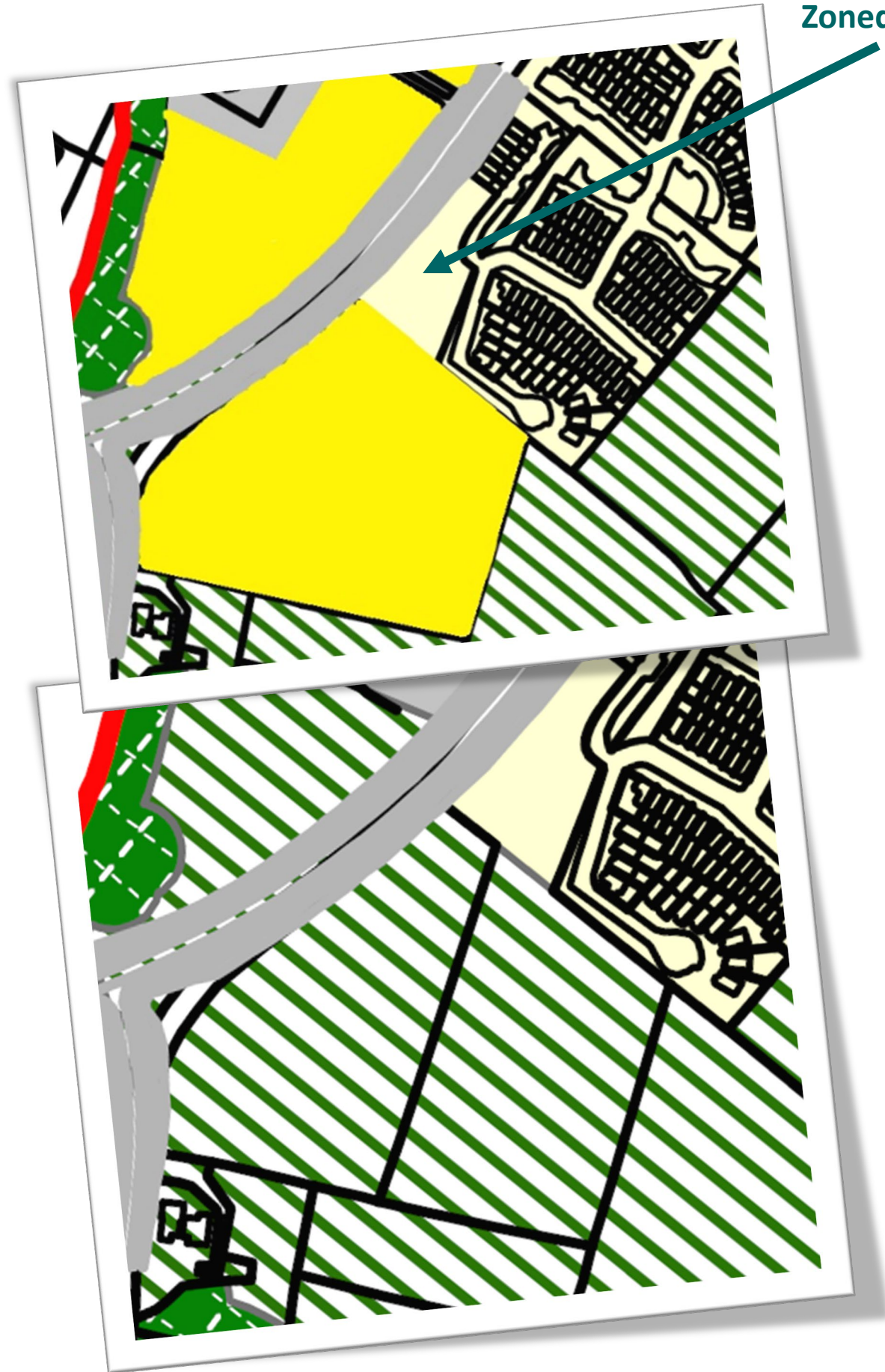
Why Residential Zoning Works – West of N81¹⁶



- The site we have proposed for Residential Zoning is **fully serviced** and borders existing residential developments on three sides (categorised as “infill”).
- Existing easements for Uisce Éireann infrastructure on the site already provide a natural buffer to the Deerpark Stream and a natural access location to the northern parcel of the site. The Natural Area zoned lands along the entire western boundary provides the ideal location for Open Space within a residential development.
- Developing these lands for residential use would create continuity with the neighbouring Blessington Abbey development, which currently has an open fence along the northern boundary. Any employment-related construction here would compromise the privacy and natural surroundings that these current residents enjoy.
- A well-planned residential development would safeguard the privacy and security of Blessington Abbey residents and would be far more likely to enhance residential amenity and property value, by fronting onto other homes rather than large industrial shed units. Such industrial buildings would likely have eaves heights of 8–10 metres along the shared boundary, which would not be conducive to protecting residential amenity. In this context, residential development is a significantly more appropriate use at this location.
- The pedestrian footpath along the N81 currently ends at the existing bus stop at the northeastern edge of the site (as indicated here). Any future residential development would incorporate the LAP Active Travel Plan creating a pedestrian link across our lands to the Deer Park Stream, and in future a link bridge across our Kilmalum Lands up to the Kilmalum Road creating safe access to the new school being constructed there.



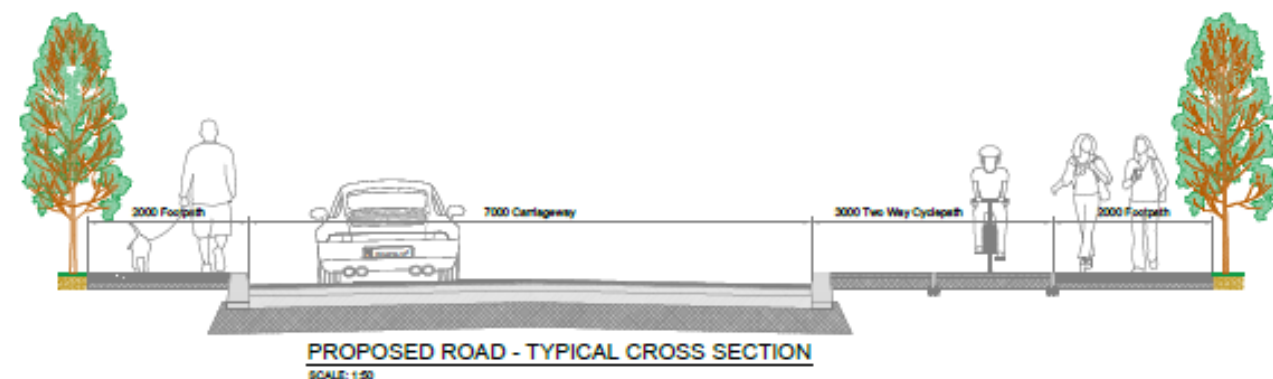
Dunmoy Residential
Zoned Lands



- The site we have proposed for Residential Zoning is **fully serviced** and borders existing residential development Burgage Manor (categorised as “**infill**”). These lands are a natural extension to the existing development, and to our Residential Zoned lands directly to the north. These lands currently have planning permission for 21 homes.
- Developing these lands for residential use would create continuity with the neighbouring Burgage Manor development, which currently has an open fence along the northern boundary and an existing access point to these lands via Burgage Manor for safe access.
- A well-planned residential development here would enhance permeability and open space for the local community across these lands for pedestrians seeking access further south of Blessington. These lands are already used by locals to traverse safely to and from Blessington as there is no footpath along the N81 at this point.
- We will be submitting a formal response as part of the “Call for Sites” and would welcome engagement with any party / planning department / WCC etc. who wish to discuss the Dunmoy Lands in Blessington and how they can be utilised to bring value to the ppl of Bless and to deliver new homes.

Infrastructure - Roads Proposal

- This proposed scheme has been drafted by POGA, our Consultant Engineers, and introduces two roundabouts and additional street infrastructure, footpaths and a dedicated cycle path (supporting the **Active Travel Strategy Map 6**). This allied with low-level lighting and a proposed lower speed limit, will deliver lower traffic speeds as vehicles enter Blessington from the South along the N81. Our proposed route for the N81 mirrors the path of the existing N81 and provides a future access road to connect in with any future outer relief road/Blessington Bypass.
- The roundabouts will act as safe access points for our lands to the East and west of the N81, and are strategically placed for safe access and travel on the lead up to and from Nolan's Bend (**Section 2.4.2 of Blessington Local Area Plan: Chapter 4: Local Transport Assessment – Figure 33: Road Segment N4**).
- The proposed roundabout to the south will act as a new “Welcome to Blessington” roundabout and mark the southern entrance to the town. This roundabout location is in line with the junction of the current preferred route for access and egress to any future Blessington Bypass.
- The access road off the roundabout to the northern end is located to align with Irish Water Infrastructure and will give safe access to the residential zoned lands we propose in this proposal.
- In Red on the plan opposite is the extended cycle path we propose will run all the way to the Blessington Lake Greenway (meeting **BLESS20** objective).



Solutions Our Proposal Enables

- ✓ **Deliverability, not zoning alone, determines housing output – ownership, servicing and infrastructure readiness are critical.**
- ✓ **Many existing zoned lands in Blessington will not deliver within the Plan period, limiting short-term housing supply.**
- ✓ **Early and structured landowner engagement would promote a more integrated and efficient zoning approach, grounded in certainty and deliverability.**
- ✓ **Targeted zoning of serviced, single-ownership lands is essential to meet near-term housing targets.**
- ✓ **Dunmoy's Burgage lands can deliver c.480+ homes immediately, with early phases achievable within the next 3 years.**

We strongly recommend these proposals be considered for inclusion in Variation No.6 to the Wicklow County Development Plan.

We are happy to engage in further discussions and can be contacted via the details on the following page.



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