

Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028

The Eastern and Midland Regional Assembly notes the publication of Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028 and sets out hereunder observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 12th September 2025.

1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of County Development Plans and Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions working with the National Oversight and Audit Commission. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024 (as amended by the Planning and Development (Amendment) Act 2025). However, the relevant provisions of the Planning and Development Act 2024, as amended, have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

Under Section 27C of the Planning and Development Act 2000, as amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions/observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator.

A submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft Variation of the development plan, and its core strategy, is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the proposed draft Variation of the development plan and its core strategy is not consistent with the RSES, the submission/observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that it is consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matter along with recommendations as required under Section 27C of the Planning and Development Act 2000, as amended.

2.0 Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region which was made by the Members of the Assembly in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision of the RSES is supported by sixteen Regional Strategic Outcomes (RSOs), that are aligned with National Strategic Outcomes of the National Planning Framework (NPF) and framed around the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES, as the succeeding tier of policy delivery in Ireland, is of critical importance for the delivery of Project Ireland 2040.

The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. In line with the provisions of the Planning and Development Act 2000, as amended, the planning authority shall ensure, when making a Variation to the development plan, that it is consistent with the RSES for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, the Regional Assembly welcomes the proposed Variation to the Development Plan.

3.0 Proposed Variation No. 1

South Dublin County Council (SDCC) has published proposed Variation No. 1 seeking to vary South Dublin County Development Plan (CDP) 2022-2028 to include a Clondalkin Local Planning Framework (LPF) and related maps into the County Development Plan. The stated purpose of the Variation is to provide for a Local Planning Framework Plan for Clondalkin to support its sustainable growth and maintain its success as a vibrant urban village for its existing and future population. The proposed Variation aligns with Policy DQP14 Objective 3 of the South Dublin CDP 2022–2028 and will be

incorporated into the South Dublin CDP 2022–2028. It is stated that the Draft LPF will align with current National, Regional and County policy objectives.

4.0 Submission

The Draft LPF provides a written statement and mapped objectives to provide a coherent planning policy framework for Clondalkin to guide the planning and sustainable development of the town. The Assembly considers that the overall Draft LPF, is generally consistent with the RSES. The submission broadly follows the chapter headings of the Draft LPF, under the following headings:

1. Introduction and Context
2. Vision and Strategic Objectives
3. Climate Action and Infrastructure
4. Green Infrastructure
5. Sustainable Movement
6. Homes, Community and Employment
7. Conservation and Built Heritage
8. Urban Design Strategy
9. Implementation and Monitoring

Introduction and Context

Section 1 of the Draft LPF sets out the local context for the area under consideration. The indicative boundary of the LPF aligns with that established in the South Dublin CDP 2022–2028. Section 1.4 recognises the National Planning Framework First Revision (NPF) as the Government’s long term policy platform to guide and manage the future growth and development of the country. The revised NPF includes a series of National Policy Objectives (NPOs) which are particularly relevant to the Draft LPF such as those relating to compact growth, the creation of attractive, liveable, well designed and integrated urban places; along with those supporting the development of the circular and bio economy.

Further strategic policy context is provided in Figure 1.6 which references the Regional Spatial and Economic Strategy (RSES). The Draft LPF recognises that Clondalkin is located within the Dublin City and Suburbs Settlement Boundary and forms part of the Metropolitan Area Strategic Plan (MASP) policy area as outlined in the RSES. The Assembly welcomes this reference which aligns with section 5.3 of the RSES, that sets out Guiding Principles for the growth of the Dublin Metropolitan Area.

In addition, the Draft LPF is also informed by a number of studies and appendices, including:

- Local Transport Plan
- Strategic Environmental Assessment (SEA)
- Appropriate Assessment (AA)
- Strategic Flood Risk Assessment (SFRA)

Vision and Strategic Objectives

Chapter 2 of the Draft LPF states that the primary focus of the Plan is to guide the sustainable growth of Clondalkin and ensure its continuous success. Informed by the South Dublin CDP 2022–2028, the Draft LPF notes that the estimated population within the Plan area, based on the 2022 Census, is approximately 12,750. This figure is expected to increase over the coming years.

To support this growth, the Draft LPF confirms that zoning has already been established under the County Development Plan. No zoning changes are proposed as part of the Draft LPF, however, there are some recommendations included for future consideration. As such, the Regional Assembly is satisfied that the proposed Draft LPF aligns with the Core Strategy of the CDP.

To inform its strategic vision and strategic objectives a SWOC analysis was undertaken as part of the Draft LPF and the Assembly welcomes the identification of the ‘opportunities’ of Clondalkin as a decarbonising zone and as a 10-minute neighbourhood, both of which are explored in further detail below.

Section 2.5 sets out the overall vision of the Plan which envisions Clondalkin growing into a vibrant, sustainable community that utilises its unique history and heritage. To deliver this overall vision, the Draft LPF is underpinned by eight strategic development principles which provide a coherent framework for guiding future development in Clondalkin:

- Promote good urban design and healthy placemaking to create a strong sense of place and to build positively on Clondalkin’s rich identity.
- Recognise the cultural, historic and economic value of the heritage assets of Clondalkin, promoting their appropriate re-use where underutilised and ensuring that new development responds sensitively to all such assets.
- Promote improved travel choices to achieve a reduction in vehicular traffic and through traffic, by the integration of active travel measures and schemes, improved public transport, and improved walking routes to and from key destinations.
- Ensure that areas of concentrated new growth are well connected to the town centre and to the surrounding areas, ensuring the necessary infrastructure is provided as required, adding to the vitality of the town.
- Promote and enhance a diverse and resilient local economy, building on the vibrancy that currently exists.
- Strengthen and expand the existing green infrastructure, as the foundation of a green and blue infrastructure network in the village and surrounding areas.
- Enable future growth in line with the compact growth approach, optimising densities, as appropriate, across the Plan area, prioritising brownfield land, ensuring that the mix and intensity of land uses are appropriate to their location in the town and their historical context and to their access to facilities, amenities, and public transport.

- Promote climate action and support the designation of Clondalkin as a Decarbonising Zone (DZ) by integrating climate action policy, objectives and measures into all aspects of the plan making process, which will deliver the strategic objectives of the Plan.

The Assembly welcomes the inclusion of these strategic objectives and considers the overall plan preparation to be comprehensive, with the structure and content being in accordance with *Local Area Plan Guidelines for Planning Authorities 2013* and the *Development Plans Guidelines for Planning Authorities 2022* (where relevant).

Climate Action and Infrastructure

The Draft LPF sets out the policy framework for a place-based approach to climate focusing on key areas such as compact growth, transport, building upgrades, green infrastructure, electricity infrastructure, waste management, integrated policy and community activation. The Draft LPF outlines localised policies aimed at transitioning Clondalkin towards a 'low carbon economy' and developing climate resilience by implementing mitigation and adaptation measures.

Clondalkin was designated a Decarbonising Zone (DZ) by South Dublin County Council (SDCC) in line with national climate policy (CAP19). As a DZ, Clondalkin serves as a local test bed for implementing and showcasing climate action strategies including mitigation, adaptation, and nature-based solutions to help meet national and regional climate goals.

The Assembly welcomes policy CA2 Objective 2 which seeks to achieve DZ carbon emissions as set out in the SDCC CAP 2024 – 2029 with specific collaboration with community and relevant stakeholders ensuring best practice. In this regard, the Regional Assembly draws the Local Authority's attention to the [Regional Development Monitor](#) which hosts a range of environmental indicators of relevance.

As highlighted in the Draft LPF, SDCC works in partnership with Uisce Éireann to ensure sufficient water supply and wastewater infrastructure to allow for sustainable growth. The Assembly notes that Clondalkin's water supply comes from the Leixlip and Ballymore Eustace Water Treatment Plants and that water supply within the wider Dublin Area is currently at a critical level of demand. As result the Draft LPF recognises that delivery of the Eastern and Midlands Water Supply Project is essential to ensure sufficient treated water to meet the longer-term growth of the wider region up to 2050.

Chapter 10 of the RSES sets out the strategic water investment priorities for the Eastern and Midland Region, noting that water supply for the wider Dublin area is at critical level of demand, and to facilitate further growth in line with NPF population growth projections, the prioritisation of water supply investment should occur. In this respect, Regional Policy Objective (RPO) 10.2 of the RSES states that EMRA supports the delivery of the strategic water services projects which are included in Project Ireland 2040 to provide for planned development and maintain and improve existing services. In this

respect, Table 10.1 of the RSES includes the Water Supply Project for the Eastern and Midlands Region to supply water to the Greater Dublin Area and other communities in the Eastern and Midland Region as a strategic water service project.

Wastewater services in Clondalkin are also provided by Uisce Éireann and are informed by the Greater Dublin Strategic Drainage Study. The Draft LPF supports key infrastructure projects, including ongoing upgrades at the Ringsend Treatment Plant and the future Clonshaugh Plant, which will enable capacity. This aligns with RPO 10.10 to 10.12 and Table 10.2 of the RSES which identifies the Greater Dublin Drainage Project as a strategic wastewater service project.

The Assembly further welcomes the policy approach to flood and water resource resilience and natural flood risk mitigation through the use of green infrastructure and nature-based solutions and which are further detailed within dedicated chapters of the Draft LPF.

Green Infrastructure

The Assembly welcomes the inclusion of a dedicated chapter on Green Infrastructure (GI) and the recognition that parks and open space promote health and well-being and enhance the quality of life. The Draft LPF states three out of five of the county GI corridors converge within Clondalkin, the Grand Canal Corridor, the M50 Corridor and the River Camac Corridor. The Assembly supports the protection and enhancement of regional and national Green Infrastructure corridors. This aligns with RPO 5.7 and 5.8 of the RSES which aims to strengthen strategic GI connections particularly in the MASP Area and promoting greenways with key cycling infrastructure.

Corkagh Park has been identified as a strategic GI core area and as directly linked to Clondalkin by Camac River which passes through Clondalkin Park. This strategic corridor supports valuable biodiversity, including woodlands, meadows, hedgerows, and scrub. It also delivers key ecosystem services while also providing recreational areas for the local community such as sport pitches.

The Assembly welcomes the County GI Strategy which informed the development of the Draft LPF, and specific policies aimed to protect, promote and extend green infrastructure. The Assembly particularly welcomes Policies GI2: Gaps and Opportunities and GI3: Green Links, which aims to identify gaps in the existing Green Infrastructure network, enhance current green linkages, and establish new connections to support a strategic, LPF-wide GI network. RPOs 7.22 and 7.23 of the RSES note the importance of the identification, protection, enhancement and management of green infrastructure in an integrated and coherent manner and the further development of green infrastructure policies. It is considered that this section of the Draft LPF could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies', Section 7.7 of the RSES, which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways;

integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

Furthermore, the Assembly has developed [a range of resources](#) to support the implementation of objectives for ecosystem services and green infrastructure which may be of assistance to the local authority in balancing environmental sensitivity with development. These include a green infrastructure and ecosystem services mapping methodology, policy briefs which include 'how to' recommendations, good practice handbooks, and infographics.

Sustainable Movement

The Clondalkin Local Transport Plan (LTP) was developed in conjunction with an Area Based Transport Assessment which guided the objectives in the Draft LPF. The Draft LPF prioritises sustainable travel modes such as walking and cycling, followed by public transport and then private vehicles.

The Assembly notes the ABTA baseline assessment of current travel patterns identified the need for safer pedestrian and cycling infrastructure and improvements to public transport. As such the Clondalkin Local Transport Plan (LTP) sets out a vision which aims to prioritise walking, cycling, and public transport, with supporting objectives aimed at reducing reliance on private car use.

The above aligns with Section 8.3 of the RSES and RPO 8.6 that there is a requirement to prepare a Local Transport Plan for selected settlements in the Region which should include the transport priorities for the settlement in terms of public transport infrastructure and services, cycle investment, improvements to the pedestrian environment and road enhancements.

The Assembly commends the proactive approach taken by the Council in identifying priority, secondary, and strategic permeability routes to support walking and cycling within Clondalkin. In particular, the Assembly welcomes Policy Objectives SM4 to SM5, which seek to enhance local community connectivity through the delivery of safe, accessible, and well-designed pedestrian and cycle links and require all new developments, including large framework sites, to develop strategic permeability routes to integrate high-quality pedestrian and cycle links to surrounding areas.

The Assembly supports the draft Framework's emphasis on improving permeability for walking and cycling and note that this approach is fully consistent with the RSES's Guiding Principles for the Integration of Land Use and Transport, which state that, where possible, developments shall provide for filtered permeability to prioritise walking, cycling and public transport, in line with the 10-minute settlement concept and healthy, vibrant place-making. The Council's attention is further drawn to the [Sustainable Mobility Academy](#) which is a repository of knowledge, showcasing case studies, project outcomes, and ongoing advancements across all local authorities for active travel and sustainable mobility. This repository is a key output of the Pathfinder 27 Project, the Smart and Sustainable

Mobility Accelerator Programme (SSMA), which is being delivered by the Assembly for the Eastern and Midland Region.

The Draft LPF notes that Clondalkin suffers with ongoing traffic congestion and supports the BusConnects service which will connect Tallaght/Clondalkin to City Centre. It is recognised that the development of BusConnects will enhance public transport in the area, in conjunction with other initiatives such as the Bus Stop Enhancement Programme, Network Redesign, and the Active Travel Programme—all aimed at making public transport more accessible and appealing to residents.

The Draft LPF refers to the recent Rail Order grant for the Dart + SW which will significantly enhance rail connectivity from Hazelhatch and Celbridge station into the city centre. In support of this, the Assembly notes the inclusion of policies SM7 Objective 2 and SM8 Objective 1 which promote the development of the BusConnects as well as the enhancement of existing and future rail and light rail services in Clondalkin, including the DART+ SW and improved linkages between the Luas and DART network. This aligns with RPO 5.2 of the RSES which supports the delivery of key sustainable transport projects (including Metrolink, DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network) to ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned. In addition, RPO 5.3 of the RSES states that future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.

Homes, Community and Employment

The Draft LPF outlines support for promoting sustainable travel movements through placemaking and supports the '10-minute town' concept, which seeks to have infrastructure and facilities within a ten-minute walk or cycle from homes. The Assembly welcomes the reference to Policy QDP5 of the written statement of the CDP which promotes short distance neighbourhoods and the achievement of 10-minute settlement by promoting compact growth, sustainable movement and connections to services, community facilities, jobs and amenities.

This concept is also outlined in the guiding principles in the RSES for statutory land use plans, relating to the integration of land use and transport in order to support the '10-minute' settlement concept whereby services are accessible in short walking and cycling timeframes or accessible by high quality public transport to these services in larger settlements. The Assembly draws the Council's attention to the recently published [15-minute city pathway document](#) published by the Assembly which identifies public policy support, ongoing actions, good practice examples, and funding opportunities to support '15-minute city' and '10 Minute Town' concepts.

Regarding the core strategy, the Draft LPF notes that Clondalkin is part of the Dublin City and Suburbs as identified in the RSES. In the CDP, Clondalkin is included as part of the wider–Clonburris–Grange Castle neighbourhood where there are undeveloped lands that have a capacity for over 5,000 housing units in this neighbourhood. Most of these housing units will be delivered in the Clonburris Strategic Development Zone (SDZ). The Draft LPF acknowledges smaller brownfield infill sites offer opportunities for additional housing.

The Assembly welcomes objectives relating to residential tenure and density, with a focus on providing accommodation for an aging population; facilities; childcare; healthcare; open space, sports and recreation; social and community; and social infrastructure. These objectives contribute to the promotion of ‘Healthy Placemaking,’ one of the three cross-cutting principles of the RSES, and are particularly aligned with RPOs 9.10 to 9.13 and Figure 9.2. These objectives also align with RPO 5.4 and 5.5 of the RSES which require future housing developments in the MASP area to meet higher density standards and residential development should be prioritised in Dublin and its suburbs.

The Assembly notes the Draft LPF emphasises the importance of providing educational facilities and promoting inclusive, accessible design to support the development of high-quality services, community infrastructure, and open space for all. The Assembly welcomes alignment and acknowledgement of RPOs 9.12 and 9.13 of the RSES which need to cater for all levels of disability, especially those of an ageing population and new social infrastructure must be accessible and inclusive for all users by using universal design principles. Additionally, this supports the broader objectives of Regional Strategic Outcome 13 of the RSES - ‘Improve Education Skills and Social Inclusion’ -which seeks to improve education and develop the right skills to attract employers and retain talent and promote social inclusion to ensure opportunities for quality jobs across the Region.

In terms of employment, the Draft LPF notes the main employment sectors are wholesale and retail, transport, and food services, followed by ICT, finance, real estate, and professional services. A significant proportion of workers reside within South Dublin County, with approximately 27% commuting sustainably via public transport, walking, or cycling highlighting the positive impact of sustainable transport infrastructure.

The Assembly welcomes the recognition of Clondalkin’s pivotal role in supporting a strong and diverse economic base in South Dublin County, noting its significant tourism assets including an 8th-century Round Tower and its strategic location beside the Grand Canal and adjacent to Corkagh Park.

Conservation and Built Heritage

The Assembly notes a Conservation Plan and separate character appraisals for each of the three Architectural Conservation Areas (ACA) in Clondalkin was undertaken to analyse the built heritage and identify any vulnerability that may affect the character of the ACAs.

The Assembly welcomes policies and objectives set out in the Draft LPF to safeguard the architectural and archaeological heritage of the Plan area, including Protected Structures, Clondalkin Village ACA, and St. Brigid's Cottages ACA. This aligns with RPO 9.30 of the RSES which supports the sensitive reuse of Protected Structures and Section 9.7 of the RSES which identifies the importance of cultural, architectural, and archaeological heritage within the Region, particular in contributing to a town's identity, and identifying the repair and reuse of historic buildings as an integral part of sustainable development.

Acknowledging its rich cultural heritage, the Assembly welcomes recognition in the Draft LPF of the importance of the managing the integration of the new development and the inclusion of policies CBH2 Objective 1; CBH2 Objective 2 and CBH2 Objective 5.

Additionally, this local policy approach aligns closely with the broader objectives of the Regional Strategic Outcomes (RSO) of the RSES. Specifically, RSO 5 which seeks to enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration.

Urban Design Strategy

The Assembly welcomes the inclusion of a dedicated chapter on the Urban Design Strategy, which emphasises the protection and enhancement of Clondalkin's historic character through a placemaking-led approach, while also establishing development principles for the wider area. The strategy is structured around four key themes: Urban Structure, Built Heritage, Movement, and Green Infrastructure, which collectively aim to guide development across both small- and large-scale sites. This chapter recognises the need for compact and sustainable growth within Clondalkin and sets out the design parameters. As outlined above, the Assembly supports this approach to future development in Clondalkin as it aligns with the core principles of healthy placemaking.

The Draft LPF welcomes the inclusion of large-scale development sites such as Ninth Lock Road and Knockmeenagh, the development of Mini-Frameworks and Village Enhancement Schemes (VES) and identifying opportunity sites which will help guide future development in a coordinated, sustainable manner.

The above aligns with RSES regeneration RPOs 9.7 - 9.9 which aim to promote the plan-led development and regeneration of publicly-owned land banks in the town and to support the economic development and regeneration of the town centre. The Assembly further welcomes measures for urban regeneration and public realm improvement measures that enhance the economic and tourism potential of Clondalkin.

Implementation and Monitoring

The Assembly notes the inclusion of a separate chapter dealing with the implementation of the draft settlement area plan, detailing objectives and the provision of an effective monitoring and evaluation system. The monitoring framework identifies the relevant department and stakeholders involved in the implementation of the Plan and the timeline. The Assembly welcomes the commitment given in Chapter 9 that South Dublin County Council will put in place an effective monitoring system to ensure that progress on key objectives in the Plan is evaluated. The Assembly draws attention to the Regional Development Monitor which provides a series of mapping and visualisation infrastructures which are intended to be of assistance to local authorities in gaining a greater insight into social, economic and environmental trends to aid better monitoring and decision making.

5.0 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

The proposed Variation underwent a screening for Strategic Environmental Assessment (SEA) and concluded that the proposal does not require a Strategic Environmental Assessment as it would not be likely to result in significant environmental effects, taking account of the relevant criteria set out in Schedule 2A of the Planning and Development Regulations 2001 (as amended).

Furthermore, a screening for Appropriate Assessment (AA) was also carried out and concluded that the proposed Variation will not have any likelihood for significant effects on any European sites, either alone or in combination with other plans or projects. The AA screening therefore concluded that it is not considered necessary to undertake any further stages of the Appropriate Assessment process. The proposed Variation does not therefore require an Appropriate Assessment or the preparation of a Natura Impact Report (NIR).

6.0 Conclusion

The Regional Assembly would like to acknowledge the extensive work that South Dublin County Council has carried out in order to prepare the Draft Clondalkin Local Planning Framework and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

It is considered that proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028 is consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031, having regard to the observations outlined above.

Regards,



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