



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

Guernsey Employment Land Study

Methodology Peer Review

States of Guernsey Environment
Department

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Nathaniel Lichfield & Partners
14 Regent's Wharf
All Saints Street
London N1 9RL

nlplanning.com

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Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

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1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners (NLP) was appointed by the States of Guernsey Environment Department in November 2013 to undertake a peer review of the Employment Land Study (ELS). This report sets out the findings and recommendations from that review.

Background and Context

- 1.2 The Environment Department is in the process of writing a new Island Development Plan to comply with the spatial planning strategy within the Strategic Land Use Plan (SLUP) approved by the States in November 2011 and the other States of Guernsey objectives set out in the States Strategic Plan.
- 1.3 This comprehensive review of the Development Plan will replace the two existing Development Plans – the Urban Area Plan and the Rural Area Plan – and in light of the SLUP a new comprehensive approach to making provision for employment land is being proposed. This is the first time an Employment Land Study (ELS) has been prepared for Guernsey. Whilst there is no statutory requirement for the Environment Department to prepare an ELS, apply any specific approach to assessing employment land availability and future requirements, or to comply with any UK planning legislation, the Department is seeking to follow current best practice in this area, insofar as it complies with the planning framework for Guernsey.
- 1.4 The Guernsey ELS was published in September 2013 to inform the second stage consultation on Key Messages, Issues and Options on the new Development Plan. This document does not represent a complete employment land review, and acknowledges that further work will be required in parallel with the preparation of the new Plan.
- 1.5 An Employment Land Workshop was convened by the Environment Department in early October 2013, to which local commercial property agents and representatives from business organisations were invited.
- 1.6 In this context, the purpose of this peer review is to help satisfy the Environment Department that the approach and methodology for the ELS – both what has been prepared to date and what further work is proposed – is robust, reliable, proportionate and appropriate so that the ELS can effectively inform future policies for the management of land for employment uses on the Island.

Approach to Peer Review

- 1.7 The approach to this peer review has been two-stage. First a desk-based review and appraisal of the relevant background and methodology to the ELS was undertaken. This included reviewing and considering the following documents:
- the Guernsey Employment Land Study (September 2013);

- the Key Messages, Issues and Options consultation responses on the Guernsey ELS 2013 (November 2013);
- Officer notes from the Employment Land Workshop (October 2013); and
- the draft criteria produced by the Environment Department for the assessment of housing and employment land sites.

1.8 Secondly, an in depth discussion and review (including visits to a sample of employment sites) was held between NLP and officers from the States' Environment Department in November 2013 to consider the approach to the ELS, review underlying data and assumptions, and how further stages are proposed to be undertaken.

1.9 Together, the above two stages has allowed NLP to review the approach and, drawing upon NLP's extensive experience of producing and reviewing employment land studies and equivalent reviews within the UK, draw conclusions and make recommendations.

2.0 **Best Practice Guidance on Employment Land Reviews**

2.1 The ELS seeks to follow best practice in preparing employment land reviews. However, in doing so, it must be recognised that:

- a this is the first employment land review to be undertaken for Guernsey, meaning that there is no previous structure, assessment or data upon which to build upon; and
- b the planning framework for Guernsey is different to that of other locations and as such best practice must be considered within the context of the Guernsey plan system.

2.2 This peer review has regard to this range of guidance documents in drawing conclusions on the Guernsey ELS methodology, recognising differences in the context within which the study is being prepared such as the Guernsey pattern of land use, data availability and strategic planning policy requirements.

2.3 For reference, the main sources of best practice guidance are summarised below.

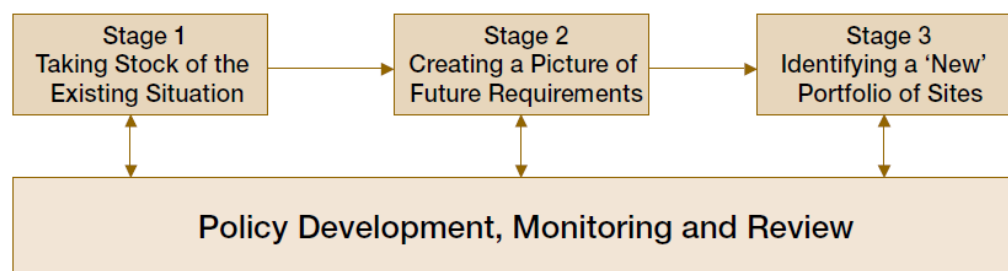
Employment Land Reviews Guidance Note, ODPM (2004)

2.4 The main UK technical guidance on the preparation of employment land studies and related assessments is contained in *Employment Land Reviews: A Guidance Note*, published by the former Office of the Deputy Prime Minister (ODPM) in 2004 (the ‘ODPM Guidance’ or sometimes referred to as the ‘Brown Book’).

2.5 Although in existence for nearly a decade, and pre-dating wider changes in UK national planning policy, the document has not been formally cancelled. It therefore remains widely cited for reference purposes as established guidance on preparing employment land reviews.

2.6 The Guidance sets out a three stage process for the preparation of employment land reviews, as set out in Figure 2.1.

Figure 2.1 Three Stage Process for Employment Land Reviews



Source: ODPM, 2004

- 2.7 Within these three stages, the Guidance outlines 14 individual steps for preparing the review (Figure 2.2).

Figure 2.2 The Steps Involved in the Three Stages of Employment Land Reviews

Stage 1: Taking stock of the existing situation	Step 1: Devise brief for Stage 1
	Step 2: Collate data on land stock and revealed demand
	Step 3: Devise and apply site appraisal criteria
	Step 4: Undertake preliminary site appraisal
	Step 5: Confirming the brief for Stages 2 and 3
Stage 2: Creating a picture of future requirements	Step 6: Understand market areas and segments
	Step 7: Select and apply suitable forecast model/demand analysis
	Step 8: Quantify employment land supply
	Step 9: Translate employment forecasts to land requirements
	Step 10: Scenario testing
Stage 3: Identifying a 'New' Portfolio of Sites	Step 11: Devise qualitative site appraisal criteria
	Step 12: Confirm existing sites to be retained or released and define gaps in portfolio
	Step 13: Identify additional sites to be brought forward
	Step 14: Complete and present the employment land review

Source: ODPM, 2004

- 2.8 The Guidance has been applied and validated throughout the development and examination of many English Council's Core Strategies and Local Plans. NLP consider that it is a reasonable and rational starting point for developing a methodology for preparing an employment land review.

Draft National Planning Practice Guidance (2013)

- 2.9 More recent guidance has been produced as part of the consultation draft National Planning Policy Guidance (NPPG), published in August 2013. This includes guidance on "assessing housing and economic development needs" which includes specific consideration of planning for employment land. This guidance is consistent with the National Planning Policy Framework (NPPF) introduced by the UK Government in 2012.
- 2.10 The draft NPPG significantly condenses the earlier 2004 Guidance, but essentially retains the key elements. It provides useful context for the application of a standard methodology:
- "The use of this standard methodology is strongly recommended because it will ensure that the assessment findings are transparently prepared. Local planning authorities may consider departing from the methodology, but they should explain why their particular local circumstances have led them to adopt a different approach where this is the case. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance."* (ID 2a-005-130729)

- 2.11 In terms of methodological elements, notable changes compared to the ODPM Guidance include:
- 1 focus on determining ‘business needs’ (in line with the NPPF), for example through consultation with the business community;
 - 2 the need to define the functional economic market area for a particular local economy;
 - 3 consideration of ‘market signals’ (e.g. levels and changes in rental levels, differentials between land uses); and
 - 4 preparing joint assessments of land availability for housing and employment uses.

Regional Guidance and Best Practice Documents

- 2.12 A number of non-statutory guidance documents have also been produced for different parts of the UK by regional bodies, including the South East England Partnership Board Guidance on Employment and Economic Land Assessments (2010) and the East Midlands Councils Employment Land Study Source Book (2012).
- 2.13 These documents have no formal status per se, but provide further best practice guidance and detail on some methodological issues/data sources at a more localised level, within the ambit of the national guidance set out in the 2004 Guidance.

NLP Experience

- 2.14 In respect of Nathaniel Lichfield & Partners’ experience and qualification to undertake this peer review, the practice has a fifty year track record of work on the economics of development, having built its reputation advising on the planning of England’s second wave of New Towns. NLP is also currently RTPI Planning Consultancy of the Year 2013. More specifically, the practice has significant track record of undertaking employment land reviews and related assessments. This has included preparing nearly 60 employment land studies across England and Wales in recent years, ranging from urban centres (e.g. Manchester, Hull, Brighton & Hove and a number of London Boroughs) to more rural areas (e.g. Cornwall, Lewes, Breckland, Boston and South Holland). The experience also includes assessing a range of different local economies, such as the science park needs of Oxford City, or cross-boundary planning in National Park Areas. NLP has also been previously commissioned to undertake peer review/audits of employment land evidence, for example in 2010 NLP reviewed all ELRs prepared in the East Midlands for East Midlands Development Agency.
- 2.15 Accordingly, NLP has developed an excellent understanding of the methodological and practical issues which arise when preparing employment land reviews and is therefore well positioned to provide peer review support to the States of Guernsey.

3.0 **Peer Review**

3.1 This section sets out a detailed review of the Guernsey ELS, with the commentary structured to follow the main sections of the published report.

Overall Approach

3.2 As set out previously, the overall approach of the ELS has been developed to broadly follow the principles set out within the extant ODPM Guidance on Employment Land Reviews (2004). This approach is well developed and can be considered a robust starting point. Notwithstanding, there are a number of areas where the Environment Department depart from the guidance set out in response to the specific issues, data availability and form of policy within Guernsey. Some of these particular elements, included where there may be scope for improvements or additional analysis, are explored below.

Stage 1: Taking Stock of the Existing Situation

3.3 The purpose of this stage is to assess of the ‘fitness for purpose’ of the existing employment land portfolio, principally in order to identify the ‘best’ employment sites to be retained and protected and identifying sites that should clearly be released for other uses.

Profiling of Employment Premises

3.4 Stage 1 of the ELS focuses on providing a detailed review of the current stock of office, industrial and storage/distribution premises in Guernsey in terms of size and location, based on Cadastre data. No trend analysis is possible because such data has not been collected previously.

3.5 Discussions with officers indicate that the depth of analysis has been constrained by the availability of data (and the terms under which the data can be used). However, given it is the first exercise of its type undertaken in Guernsey, the analysis appears to provide a reasonable basis for understanding the current stock of employment space, and provides a starting point for future monitoring and review.

3.6 The stock review is supplemented by analysis of market indicators such as demand, rents and vacancy levels (based on a survey of premises being marketed by commercial agents) and consideration of planning permissions involving net change of employment floorspace. Both sources are important to providing a sense of levels of market activity, although there are two important limitations to note:

- 1 Not all types of employment space are marketed in formal terms by commercial property agents, and therefore some elements of vacant supply may not be captured by this information. The effect could be that

- some vacant space is not included within the supply (e.g. rural employment space);
- 2 The planning permissions data is only recorded in terms of what floorspace has been granted as opposed to what has actually been *implemented*. The effect could be to over-state the amount of employment floorspace that has been either gained or lost during the monitoring period (e.g. if permissions for new space were obtained but not built out). The issue was explored with officers, and it was concluded that there were unlikely to be any major property market factors to suggest the gap between permissions and implementations would be significant.

Assessing Employment Sites

- 3.7 Beyond the stock analysis outlined above, a detailed appraisal/audit of existing employment sites has not yet been undertaken by the Environment Department, and, accordingly, is the key deficiency in this stage of the methodology.
- 3.8 Some initial analysis (at section 8.0 of the ELS) has been undertaken to establish broad typologies of employment sites within Guernsey, ranging from established office locations, general industrial areas to sites for specific occupiers. This approach is correct and complies with the ODPM Guidance and draft NPPG in seeking to help understand market segments. It is also sensible as a basis, for the first time in Guernsey, to appraise the role and 'fitness for purpose' of the current portfolio of sites (i.e. by understanding the different functions and occupier requirements that they meet). In taking this approach forward, it will be important to ensure there is sufficient read across to any area/policy requirements that are contained in the SLUP (e.g. mixed use redevelopment opportunities).
- 3.9 The Environment Department has supplied NLP with draft site assessment criteria for the purposes of assessing existing sites and those submitted through the 'Call for Sites' process (to be undertaken in parallel with the Strategic Housing Land Availability Assessment [SHLAA]). Detailed consideration of these criteria is contained within the companion NLP peer review report on the SHLAA methodology, and is not repeated here. However, two specific comments with regard to employment site appraisals (for existing sites) are highlighted below:
 - 1 The assessment criteria should include consideration of 'market attractiveness' factors, for example (drawing on the ODPM Guidance):
 - i Has there been recent development activity within the last five years?
 - ii Is the site being actively marketed for employment purposes?
 - iii Has there been any recent market activity?
 - iv Is the site well occupied and/or do significant (long-term) vacant premises exist?
 - 2 The assessment should record the extent to which existing sites have undeveloped land capacity that could contribute to meeting future needs.

Wider Economic Considerations

3.10 The baseline analysis focuses almost entirely on the stock of employment space, its location and size, and reporting of market signals. Some analysis of past job growth trends between 2008-2011 is provided drawing on Oxford Economics data, but this is a relatively short time period (coinciding with the economic recession) and it is difficult to draw firm conclusions from this.

3.11 Whilst not a specific requirement of the ODPM Guidance, there would be some benefit from this being supported and supplemented by some wider economic analysis or qualitative considerations where possible. Additional analysis might consider how economic/sectoral drivers are resulting in particular types of property market outcomes or demand for space, for example:

Sector/land use	Market driver / economic trend	What does it mean for employment space?

3.12 Work undertaken by Oxford Economics (February 2012) to inform the Economic Development Strategy for Guernsey may be a helpful reference in this regard.¹

Stage 2: Creating a Picture of Future Requirements

3.13 Stage 2 of an employment land review is the assessment of future requirements for employment land and premises. The ODPM Guidance and draft NPPG note that this should typically be based on a range of techniques including employment forecasts, future changes in labour supply and development (take-up) rates based on gains and losses of different types of floorspace.

3.14 The ELS currently draws on two methods:

- 1 Econometric forecasts up to 2025 produced by the States of Guernsey Policy and Research Unit;
- 2 Trends in planning applications data for employment floorspace.

3.15 These are considered in turn below. A labour supply based approach was considered less relevant on the basis that the States' current policy is to retain the population at March 2007 levels.

Econometric modelling

3.16 The States of Guernsey Policy and Research Unit has produced bespoke forecasts for the amount of office, industrial and storage space likely to be required in the period up to 2025. The projections use modelling based on historic trends in workforce and Gross Domestic Product (GDP). Full details are set out at Appendix D of the ELS.

¹ Review of Guernsey's Economic Profile and Assessment of Future Opportunities, Oxford Economics, February 2012, prepared for the States of Guernsey, Commerce and Employment Department.

- 3.17 The exact methodology employed and some of the underlying assumptions are not immediately clear from the description contained in the ELS report, and accordingly NLP arranged to meet with an officer from the Policy and Research Unit to discuss the basis of the modelling in more detail. The basis of the econometric forecasts set out in Appendix D was explored, and in essence, it was established that these triangulate a range of projections derived from short (2009-2012), medium (2001-2011) GDP trends, and short-term (2009-2012) workforce trends.
- 3.18 It is not the purpose of this review to appraise the validity or otherwise of, what are effectively, trend-based econometric forecasts. Ultimately, as the ELS notes, forecasts of this type are not an exact science and should be viewed as indicative rather than prescriptive. On the face of it, the forecasts produced appear reasonable and seek to take account of a combination of short/medium term and output/job factors. However, it should be noted that the difference between States of Guernsey forecasts and, for example, those typically produced by independent economic forecasting houses (and often commissioned by English Local Planning Authorities to inform employment land reviews), is that they do not specifically seek to consider future changes in either output or employment within individual sectors having regard to structural trends or changes in the economy. This might be considered a limitation in terms of to what extent the forecasts can be considered to be genuinely future-facing.
- 3.19 In this context, there may be merit in considering some alternative potential scenarios of future growth for comparison purposes. These might model the impact of particular policy approaches (e.g. aspirations to diversify the Island's economy) or strategy objectives, or for example changes to the financial sector following the recent global financial crisis and changes to the regulatory regime. It is understood that there is ongoing work in other States' departments on developing a new Economic Development Strategy for the Island, and it would appear prudent that some recognition of this is made as part of the evidence base for the Development Plan. Some initial consideration of this is made at Section 11 of the ELS, but this could be expanded upon.

Floorspace needs

- 3.20 The growth projections have been converted to floorspace requirements based on an analysis of the existing relationship between GDP and cadastre (TRP) land use categories (i.e. to give an equivalent of output per sq.m). There are some limitations to this approach, namely:
- 1 It assumes that all floorspace is currently occupied, and makes no allowance for vacant floorspace (i.e. assumes premises are being used to their full capacity and will continue to be so).
 - 2 There are some potential discrepancies between economic and land use sector categorisations in the data, although it is understood that these are likely to be limited (and some specific adjustments for larger occupiers are set out at Appendix C of the ELS).

3 A general space productivity factor is applied (equivalent to 1% increase in GDP per TRP per annum), but otherwise that the average space per employee in each land use category will remain constant over the Plan period.

3.21 To help validate the conversion of jobs to employment space, it is suggested that some local sampling of employment densities and plot ratios be undertaken for different types of land uses/sites. This could draw upon the site assessment process (under Stage 1 above) and planning application information to interrogate approximate ratios across the different site typologies. The Department may also wish to draw upon the latest published employment densities used in the UK and generally applied in employment land reviews.²

Historic trends in planning applications

3.22 The scenario based on analysis of planning permissions provides a guide to past development rates on the Island. It is not an absolute measure because, as noted above, it is based on permitted floorspace rather than space actually completed.

3.23 During the discussions, it was identified that where permissions include a mix of employment floorspace (e.g. across industrial and storage/distribution uses), this floorspace was currently included within both categories of floorspace effectively leading to a degree of double-counting (and therefore potentially over-stating the requirements). It is recommended that the data is reanalysed to apportion floorspace on an equal basis between land use categories to reduce this effect.

3.24 Overall, this approach draws on the best information currently available, and has the advantage of providing some indication of levels of development activity/market demand based on what has occurred in the past. This assumes that past development patterns are a reasonable guide to what might happen in the future; in the case of storage and distribution activities, the Department considers this approach is less reliable because of the impact of the Low Value Consignment Relief which operated between 2005-2011. This approach appears reasonable.

Net and Gross Requirements

3.25 The analysis currently presented in Stage 2 provides an indication of *net* floorspace requirements, as opposed to *gross* floorspace requirements typically used for planning purposes. The main differences are the extent to which some allowance should be made for replacement of losses of employment space during the Plan period.

² Employment Densities Guide, Second Edition, HCA/Offpat (2010): <http://www.homesandcommunities.co.uk/employment-densities-guide-2nd-ed>

- 3.26 The Department does not currently hold detailed information on losses, however, some broad estimates can be drawn from planning permissions data. A detailed review of applications involving loss of employment floorspace could be undertaken to assess the types and locations of space involved, and the circumstances in which space has been lost. This will help inform a judgement about the scale of losses that should be replaced over the Plan period.

Stage 3: Identifying a New Portfolio of Sites

- 3.27 This stage in the review represents the point at which the existing land supply (e.g. undeveloped allocations, extant planning permissions) is assessed in terms of its ability to meet identified future employment land needs, both in quantitative and qualitative terms. Where existing sites are not sufficient to meet future needs, then potential new sites should be identified and appraised.
- 3.28 It should be noted that even where there is not a quantitative requirement for land in overall terms, there may be qualitative factors to consider such as meeting the needs of particular sectors, spatial distribution of supply or to provide for particular types of floorspace.
- 3.29 As noted above, this stage of the ELS has not yet been undertaken by the Department. The commentary below therefore provides some pointers based on the preceding analysis.

Determining the Demand/Supply Balance

- 3.30 The current demand/supply position is not firmly established by the ELS, but it is expected that this can be considered once the audit of existing sites has been completed. This process should seek, as far as possible, to identify potential development capacity within existing sites that might contribute to meeting future needs at some level.

Call for Sites

- 3.31 As part of the Key Issues and Options consultation, landowners were invited to make submissions identifying land with future development potential for employment uses (alongside potential housing sites) provided that it accords with the spatial strategy set out in the SLUP.
- 3.32 Detailed comments on the site assessment criteria are contained within the companion NLP peer review report on the SHLAA methodology, with specific comments on employment sites set out under Stage 1 above. The main comment in terms of appraising potential new employment sites is that adequate consideration is given to 'market attractiveness' factors within the appraisal criteria.
- 3.33 In addition, NLP has separately supplied the Environment Department with example proformas for how the information from these site assessments can be recorded and, in turn, provide a basis for future monitoring and updating.

Consultation Inputs

- 3.34 The need to undertake consultation as part of the process of preparing an employment land review is noted within the ODPM Guidance and also the draft NPPG. In respect of the latter, there is a particular emphasis on identifying ‘business needs’ and consulting with business organisations.
- 3.35 The Environment Department has undertaken two specific forms of consultation on the ELS, as follows:
- 1 Key issues and options consultation (second stage), between August – September 2013.
 - 2 Employment Land Workshop convened in October 2013 to which local commercial property agents and representatives from business organisations were invited.
- 3.36 A review of the summary of consultation responses and workshop notes indicates no significant methodological comments were raised on the ELS specifically. It does, however, appear that both processes have yielded important qualitative feedback on the needs of different property sectors and on current planning policy approaches to employment development/changes of use. The Department should seek to ensure as far as possible that these are captured as part of the final ELS document (e.g. as an appendix).
- 3.37 It is also common practice for some employment land reviews to include business surveys. A specific survey has not been commissioned by the Department for the purposes of the ELS, although it is understood that surveys of businesses have been undertaken by other departments within the States of Guernsey and these could be referred to within the ELS if relevant.

Future Monitoring and Review

- 3.38 The draft NPPG indicates that employment land reviews should be subject to periodic updating, and suggests a timescale of every five years or so. Future versions of the Guernsey ELS should build upon the current version, and importantly, start to provide some analysis of trends over time against which planning policy measures can be monitored and reviewed.
- 3.39 It is considered that the Environment Department’s ability to monitor the supply of employment land and premises, and to inform future updates to the ELS, would be aided by the maintaining records of the following (at least on an annual basis):
- a employment land and premises (current stock) database;
 - b employment permissions granted, by type and location;
 - c employment permissions developed by type, matched to allocated sites, including recording of net gains and losses of floorspace;
 - d employment permissions for development of sites where change of use is involved;

- e employment land and premises availability and vacancy levels; and
- f employment premises enquiries (potentially via local commercial property agents).

4.0

Conclusions and Recommendations

Conclusions on Approach

- 4.1 NLP has reviewed the Environment Department's ELS, and discussed in depth with officers the approach and practicalities of preparing an employment land review which takes account of best practice guidance. This report has sought to critically review the approach, identify areas where improvements could be made and highlight areas of additional analysis that might help inform the overall conclusions to be drawn when the full ELS (i.e. Stages 1-3) is completed.
- 4.2 Overall, NLP considers the approach set out is robust and proportionate to developing the evidence necessary to underpin the Island Development Plan. The broad approach follows the best practice guidance developed under the English planning system, but has been modified in certain areas to respond to the specific context of Guernsey as well as the data and resource constraints that exist. Crucially, the approach therefore appears pragmatic, particularly as no ELS (or equivalent) has previously been produced for Guernsey.

Recommendations

- 4.3 Although the overall approach is considered robust, there are a number of practical recommendations which NLP consider may usefully improve the process and outcomes of the ELS (in addition to the detailed points noted in section 3.0). These recommendations are set out as follows:
- 1 Complete a detailed appraisal of existing employment sites to complete the Stage 1 analysis, drawing upon the site typologies and assessment criteria outlined above.
 - 2 Supplement the analysis of the stock of employment space with consideration of key economic/sectoral trends within Guernsey, and how these are impacting the property market and potential future requirements.
 - 3 Consider the scope to model alternative scenarios of future economic growth, for example taking account of the emerging Economic Development Strategy.
 - 4 Draw overall conclusions on the demand/supply balance, having regard to both quantitative and qualitative needs for different types of employment space.
 - 5 Use the ELS as a foundation for a more systematic and rigorous approach to monitoring so that performance against objectives can be more accurately established, and lay the ground for future reviews of the evidence base and planning strategy. This recommendation may have cross-cutting implications for how other land use sectors are considered.

- 4.4 In undertaking further work on the ELS, the Environment Department should remain flexible, pragmatic and open to adjusting the approach to respond to any specific issues that arise as a result of undertaking the assessments of both existing and potential new employment sites.



**Nathaniel Lichfield
& Partners**

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Leeds
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London
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Manchester
0161 837 6130

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