

## **SUBMISSION ON PROPOSED CANBERRA BRICKWORKS AND ENVIRONS PLANNING AND DEVELOPMENT STRATEGY**

I made a submission on 24 June 2014 and notice that many of the issues identified then remain unchanged in this 2015 draft.

The purpose of this submission is to list a few of many aspects of the plan which I argue any reasonable person would find unacceptable.

### **Full restoration of the Brickworks**

By abandoning the earlier Government proposal to link housing development directly with the restoration of the Brickworks site the Government has thrown away more than its credibility. It has removed the only inducement offered to the Yarralumla community to accept the development. This inducement being to contribute to the public good by helping to create a world class historical and tourist destination from a ruin. The way the Government put it the full restoration of the brickworks site could not be achieved without the sacrifice of green space and amenities and being civic minded many Yarralumla residents (and citizens) would have been influenced and perhaps won over to this argument.

Now that restoration of the Brickworks site has been sidelined the focus shifts to the real purpose of the project and its total lack of benefits for Yarralumla. The winners from this project apart from purchasers would be some service providers, developers, real estate agents and the ACT Government. I challenge the LDA to show any benefits to be gained by the average Yarralumla resident, and if benefits can be detected how they outweigh the penalties of the proposal.

### **Dunrossil Drive**

Dunrossil Drive is one of the few grand avenues in the ACT capable of inspiring pride, despite the obvious lack of care in recent years. No one would suggest letting overflow housing developments in Campbell encroach at the entry point to Anzac Parade. So why is this thought to be acceptable for Dunrossil Drive? Government House differs from the Australian War Memorial, but it is still a venue for distinguished visitors from here and overseas, some of whom would be travelling directly from the airport, which in its last stages is a processional route. We want to impress these visitors, not drive them through a housing estate and "a ceremonial entrance to Canberra Brickworks and Government House". This is hardly grasping the Site Opportunity of "continuing the visual and physical character of Dunrossil Drive" as claimed. This proposal shows Lack of Vision, Lack of Aesthetic Sense and Lack of Pride.

## **De-forestation**

As noted in my earlier submission, the western entry to Yarralumla along Dudley Street is a gentle introduction to the suburb, emphasizing the open space and trees which are characteristic. Further west back along the Cotter Road where the tree cover surrounding the beginning of Dunrossil Drive is also in the picture the combined stands of trees show an impressively large green entry to south Canberra. To cut down 2,000 of these trees, remove the ridges and level the area for the purpose of installing the extension of a new housing estate is environmental vandalism on a grand scale and against the spirit and intentions of the Garden City (it also seriously undermines Canberra's claims to be a planned city). It marks a new low for this Government which has also proposed cutting down all the trees in the centre of Northbourne Avenue for the light rail, an idea about which most of the community is aghast, whatever their feelings about the light rail.

## **Population density**

As the basic purpose of this project is to provide additional housing for Canberra's growing population it is not unreasonable to expect that there would be a simple account of the reasons for the growth in population numbers, the projections, the steps the ACT Government has taken to limit, influence, or otherwise manage the inflow, why an infill policy is necessary and what part the available land in Yarralumla contributes to these aims etc. No such explanation is given.

Yet there must be some reason for the dogged determination (and inflexibility) of the LDA in putting up increasing dwellings /people numbers in each new proposal in the face of appeals to reduce the population density of the project.

The ACT is already starting to experience the problems of population growth through traffic congestion, increasing noise and other ills and yet the LDA still does not seem to understand that more than doubling the population of Yarralumla will have an huge adverse impact on the character of the suburb and will likely overwhelm its facilities.



2 April 2015

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 4 April 2015 12:48 PM  
**To:** Brickworks  
**Cc:** BARR; GENTLEMAN; RATTENBURY; CORBELL; HANSON; DOSZPOT; FITZHARRIS;  
gai.brodtmann.mp@aph.gov.au; senator.seselja@aph.gov.au;  
andrew.leigh.mp@aph.gov.au; senator.katy.gallagher@aph.gov.au;  
Info@yarralumlaresidents.org.au  
**Subject:** Submission CB+E Planning and Development Strategy

Dear Land Development Agency,

**Submission on the Canberra Brickworks + Environs Planning and Development Strategy  
February 2015 (Deadline 4 April 2015)**

I live in [REDACTED] and wish to make the following submission.

As one of the younger (under 35) homeowners in the suburb, I identify with the vision to create in-fill in our city and to create a sense of vibrancy through adaptive reuse of the Canberra Brickworks. I commend the LDA/ACT Government for it's forward thinking in this regard.

However, I do not support the Canberra Brickworks and Environs Planning and Development Strategy (Strategy) in its current form. Or to use the language of the recent telephone survey, I am strongly not in favour of the proposal.

The LDA has done a very good job of selling a marketing strategy, complete with fantastic images, videos and mood boards. But the truth of the proposed development is in the detail. The Strategy continues to conflate Brickworks conservation and adaptation with a massive residential development and multi-million dollar arterial road realignment. These are separate issues.

I support the adaptive reuse of the Canberra Brickworks but I am appalled that only \$5 Million from the sale of the land has been set-aside for this purpose. It is clear that the rationale for high density residential development is not to pay for the conservation and adaptation of the Brickworks.

No other suburb in Canberra is proposed to be doubled in size. Therefore genuine consultation with residents is essential. It is the residents who will be left to live with the inadequate infrastructure to cope with the proposed development. Parking is already an issue at the local shops without adding an additional 2000 cars to the suburb. Ideally we will see a shift away from

car use to more sustainable transport in the future. However, this is Canberra, where presently use of cars is essential in absence of alternative accessible and reliable public transport. Entry and exit points to the suburb are already congested without adding 2000 more cars to the suburb. Where are the petrol stations or supermarkets you would expect with a development of this scale and density?

This is not Braddon, full of highrise apartment buildings where residents only have to travel a few blocks to a supermarket and petrol station. Residents will still have to get in their cars to drive for this purpose. The designated mixed-use retail space in the proposed strategy is inadequate.

This is not Gungahlin, Forde or Kingston Foreshore where residents live on top of each other, despite being surrounded by paddocks/open space. This is not New Acton, with it's fabulous facilities and close proximity to both the lake and the city. The drawcards for this development are the Brickworks (which won't actually be properly adapted due to lack of funding allocated to do so) and the Yarralumla suburb (which is known for it's leafy streets, proximity to the lake and reasonable sized residential blocks - none of which will translate in the proposed development).

**We need proper planning, effective consultation and thoughtful innovation. Do we have passionate MLAs who are willing to take this issue on to ensure a quality development eventuates?**

I fully support the Yarralumla Residents Association Submission to the Land Development Agency of 1 April 2015 on the Canberra Brickworks and Environs Planning and Development Strategy February 2015, including its call for:

- In particular, transparency from the ACT Government on costings for preservation and adaptation of the core Canberra Brickworks elements, and calls for establishment of a formal trust, with Government funding, empowered to raise funds from the private sector and public.
- A comprehensive traffic survey, with peer-reviewed modeling, of the existing suburb of Yarralumla, and adjacent suburbs to assess future traffic flows and impacts;
- The development's scale to be reduced to one in keeping with the character of Yarralumla and site topography, with a mix of dwellings and heights (no more than 3-4 storeys);
- Retention of the current landforms, buffering of the development from the current suburb with connected natural parkland instead of a formal park along Denman Street, retention of continuous walking /cycling trails and of the golden sun moth and natural temperate grasslands within that corridor;
- A revised strategy for the Canberra Brickworks and Environs that is consistent with the National Capital Plan.

Yours sincerely,



Email address: [REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 6 April 2015 10:50 PM  
**To:** Brickworks  
**Subject:** CANBERRA BRICKWORKS AND ENVIRON PLANNING AND DEVELOPMENT STRATEGY 2015: submission

Yarralumla Brickworks was integral to the construction of our national capital. And, such an important part of this city's establishment deserves very special treatment. Yet, since the early period of self government there have been several protracted attempts at consultation (with professionals in various fields, experts within government, and the wider community) to no avail!

When will someone take an holistic approach and bring all the interested parties to the table in a spirit of genuine consultation. Such an approach may just enable the development of a plan which would protect the Yarralumla brickworks while providing for a high quality, 21<sup>st</sup> century housing estate.

I fully support the views expressed in the submissions of the YRA and the ISCCC.

[REDACTED]

Mr David Dawes  
CEO Land Development Agency  
Email: [brickworks@act.gov.au](mailto:brickworks@act.gov.au)

Dear Mr Dawes

**Submission in response to the LDA “Canberra Brickworks and Environs Planning and Development Strategy 2015”**

This is a submission in response to the Land Development Agency’s (LDA) “Canberra Brickworks and Environs Planning and Development Strategy 2015”, hereafter referred to as the “LDA 2015 Strategy”. The LDA 2015 Strategy was presented to the public as a Newsletter to residents in late February 2015 as a revision to earlier iterations. The amount of detail presented in the document is, yet again, incredibly scant given the scale of the development proposed by LDA and its significance for the communities of Yarralumla, adjacent suburbs and to Canberra as a whole. Yet even the amount of detail provided is sufficient to generate several major points of concern regarding the LDA 2015 Strategy.

At the broader scale, particularly concerning are (1) the even greater number of new dwellings proposed in the LDA 2015 Strategy, the bulk of which are to be housed in buildings of 4 to 8 storeys which will contrast starkly with the existing character of Yarralumla, combined with (2) the dismal lack of services and infrastructure envisaged by the LDA 2015 Strategy to support this vast new development and its’ unfortunate occupants.

It is now clear from the ever-expanding scale of the housing development being proposed by LDA that what is being proposed is no longer simply “urban infill”. **What is now being proposed by LDA is, in fact, a new suburb.** But it is a suburb with almost none of the community amenities and infrastructure that would now be expected to be delivered by a responsible land management organisation concerned about the future of Canberra and its residents.

These and a large number of additional concerns are comprehensively captured in the submission from the Yarralumla Residents Association (YRA, April 2014). We hereby state our endorsement of and support of the YRA Submission.

**This submission focuses on the “Quarry Zone”**

This separate submission focuses on one sector of the site captured in the LDA 2015 Strategy, the area to the east of the Brickworks themselves. In this submission we will refer to this area as the “Quarry Zone”. This Quarry Zone requires particular focus because it represents one area of the LDA 2015 Strategy that impacts directly and particularly adversely on existing and future residents of Yarralumla.

Under the LDA 2015 Strategy it is envisaged that the Brickworks Quarry Zone be developed for three purposes: a Quarry Park – a “high quality urban open space” for community use; housing, consisting of now only approximately 20 townhouses; a roadway that will cut right through the Quarry Park.

We support and endorse the creation of a “Quarry Park” for community use. Currently, the Quarry Zone is fenced off from the public and is needlessly inaccessible. Our principal concerns with these proposed uses are summarised in the following two points:

1. There is no credible justification for the construction of a road that cuts right across the Quarry Park, a “high quality open urban space” designated for public use. Any such road would be very dangerous for park users and disproportionately expensive.
2. There is no credible justification for the construction of housing within the Quarry Zone. It will be disproportionately expensive and potentially dangerous to safely provide land and services required for any dwellings within the Quarry Zone.

We expand on these two points here.

*1. There is no credible justification for the construction of a road that cuts right across the Quarry Park, a “high quality open urban space” designated for public use. Any such road would be very dangerous for park users and disproportionately expensive.*

It is claimed by the LDA that the Quarry Park will be “high quality urban open space”. Presumably the LDA envisages that the public would use the park for pedestrian activities, no doubt including for example, children singly or in groups running, playing, exploring the park, etc.. Yet the LDA is proposing to construct a road cutting right through the “Quarry Park”, to allow vehicle access between the proposed new housing development, at its southern end, and Bentham Street, on the northern boundary of the Quarry Zone.

**What an absurdly dangerous proposition,** to run straight through this “high quality open space” a road that, even at current LDA estimates, will carry nearly 3000 vehicle movements per day!!

Even if such a road could be justified, it is beyond doubt that to stably site **a road through the Quarry Zone will require very substantial and very expensive engineering and earthworks** and perhaps the actual elimination of the quarry faces displayed so prominently in the artists’ impressions within the LDA Newsletter (February 2015). Notably, if a road is to be engineered to the northern boundary of the Quarry Park then the earthworks required will effectively destroy the quarry face in that section.

*2. There is no credible justification for the construction of housing within the Quarry Zone. It will be disproportionately expensive and potentially dangerous to safely provide land and services required for any dwellings within the Quarry Zone.*

The LDA 2015 Strategy indicates the construction of now only ca. 20 dwellings within the Quarry Zone. This is a very small number compared to the ca. 1800 new dwellings proposed in the overall Strategy.

**No plausible justification is provided to justify “leakage” of housing into the Quarry Zone.** During face-to-face discussion with LDA staff, it has been indicated that housing within the Quarry Zone is needed to provide so-called “passive security” for the proposed Quarry Park and the Brickworks themselves. But there is no need to construct any new dwellings at all within the Quarry Zone in order to provide passive security. The Quarry Zone is already lined by housing on the eastern and western borders that provides this service. The current occupants of this existing housing have direct views into the Quarry Zone either through transparent security fencing (W and NE boundaries) or from windows overtopping solid fencing (SE boundary).



Date: 02/04/2015

To:  
Land Development Agency, [brickworks@act.gov.au](mailto:brickworks@act.gov.au)

Copy to:

Chief Minister Mr Andrew Barr MLA, [barr@act.gov.au](mailto:barr@act.gov.au)  
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Yarralumla Residents Association, [info@yarralumlaresidents.org.au](mailto:info@yarralumlaresidents.org.au)

**Submission on the Canberra Brickworks + Environs Planning and Development Strategy February 2015  
(Deadline 4 April 2015)**

Dear Sir/Madam,

I live at [REDACTED] and wish to make the following submission.

I fully support the Yarralumla Residents Association Submission to the Land Development Agency of 1 April 2015 on the Canberra Brickworks and Environs Planning and Development Strategy February 2015, including its call for:

- A comprehensive traffic survey, with peer-reviewed modeling, of the existing suburb of Yarralumla, and adjacent suburbs to assess future traffic flows and impacts;
- The development's scale to be reduced to one in keeping with the character of Yarralumla and site topography, with a mix of dwellings and heights (no more than 3-4 storeys);
- Retention of the current landforms, buffering of the development from the current suburb with connected natural parkland instead of a formal park along Denman Street, retention of continuous walking /cycling trails and of the golden sun moth and natural temperate grasslands within that corridor;
- A revised strategy for the Canberra Brickworks and Environs that is consistent with the National Capital Plan;
- Transparency from the ACT Government on costings for preservation and adaptation of the core Canberra Brickworks elements, and calls for establishment of a formal trust, with Government funding, empowered to raise funds from the private sector and public.

Further to this, I see the opportunity to create a large space which nurtures the current beauty of the area. There are beautiful walking trails which connect the residential areas to Dunrossil Drive and this adds to the regions beauty for all Canberrans.

When interstate visitors arrive, their comments are on the city's history, the bush and the nature at our doorstep.

This is being trashed by the proposed plan. Canberra needs to embrace it's identity and not try to transform into something that it is not. We are the 'bush capital' and there are many other ideas that can make use of this area which will enhance the long held view of Canberra by it's many interstate visitors.

This plan could reduce the number of dwellings but make use of a central park in the style of Centennial Park in Sydney. Within that park is a pine forest similar to what exists in the selected area. High end housing (not small townhouses) could embrace this view and it will be enjoyed by many more people than the proposed plan.

[Redacted]

Yours sincerely,

[Redacted]

[REDACTED]  
[REDACTED]  
[REDACTED]

4 April 2015

To whom it may concern

**Submission on the Canberra Brickworks and Environs Planning and Development Strategy (the Strategy)**

We live in Yarralumla, being the owners of [REDACTED]. It is a five to ten minute walk to the Brickworks site and adjoining natural area. We are directly impacted by the proposed redevelopment of this site.

For the reasons outlined below, we do not support the Strategy.

**Density**

The Strategy proposes up to 1800 dwellings, with about 1300 of those on the Yarralumla side. This is an increase, rather than a decrease, from the July 2014 proposal and also from the original proposal of 1100 dwellings in 2010-11. The height of the proposed development continues to range from 2 to 8 storeys spread over a grid intersected by a series of straight roads at right angles to each other. While there is now more two-storey housing than in the July 2014 proposal, this housing is crowded into two areas. Most of the housing continues to be 3 to 8 story apartments. Wooded areas and native grasslands are replaced with landscaped green spaces.

Overall, the Strategy continues to promote development that is incompatible with Canberra as the “bush capital” and specifically with the surrounding suburbs and natural areas. Publicly reported figures suggest that there will be over 3000 new residents in Yarralumla communities, nearly doubling the existing population.

The Land Development Agency has previously indicated that 45,000 new dwellings will be needed in the ACT by 2033. Most of these dwellings, in the South, will be provided by the Molonglo development, which has already commenced. The proposed 1800 dwellings outlined in the Strategy contribute only a small percentage of that total- a figure that could easily be made up through other developments. Further, the ACT Government has previously lowered its expected demand for new dwellings and some major development sites have not sold. With the current Federal Government determined to reduce public servant positions and relocate others to regional centres, it is hard to see where the demand for these 1800 dwellings will come from.

In our view, there is a significant risk that the surrounding communities will be left with a “white elephant” after the Government has made its revenue through the sale of land to the first developers.

### **Loss of green space and habitat**

The area surrounding the Brickworks is a natural green space which serves as a break between Yarralumla and other communities. Residents regularly use the area for walking and other types of recreational activities. The area contains trees seeded from the nearby Westburne Woods as well as natural grasslands, which serve as habitat for a variety of birds and other species. Part of the area contains trees planted by the local community in an earlier revegetation project.

The Strategy proposes that these natural areas be completely replaced with buildings, paved streets and landscaped parks. The Strategy states that 55% of the site will be public realm, however, to achieve that figure the Strategy counts vegetated nature strips and landscaped areas adjacent to Adelaide Avenue and Cotter Road. Those areas will either be difficult for many people to access or people will not want to access them given their location. It is misleading to count these areas and a better estimation of the amount of useable open space versus built up area should be made available.

The Strategy now identifies that there will be a loss of golden sun moth habitat, both natural temperate grasslands and other areas. The ecological assessment which accompanies the Strategy indicates that while some of these areas have been degraded, floristic values are still strong and appropriate management would stem any further degradation. The Strategy makes no mention of maintaining these areas, rather the areas appear slated for destruction and replacement with built up areas and landscaped parks, as per the MasterPlan and the landscape strategy. Various offset measures are suggested, some of which would be undertaken off site. It would be far preferable to retain the habitat and grasslands, improve them through appropriate management, and either not develop the site or develop it in a more sympathetic manner.

The Denman Street Park has been reduced in size, to support parking. Given the relatively small size of this park any reduction in its size is not supported. If the development proceeds, it should be restored to the original proposed size, with any parking area to be additional to the open space.

Again there will be a significant change in Yarralumla's character if the Strategy proceeds as proposed.

### **Traffic impact**

Traffic impact continues to be a significant issue. The proposed Mint interchange will alleviate some of the traffic impact. However, the traffic assessment report shows that the first two stages of the proposed development will result in increased traffic through areas of Yarralumla that border or are adjacent to Kintore Crescent and Denman Streets. This traffic is not projected to return to current levels until after the completion of the third stage of the development when the Quarry Road is finished. Woolls and Maxwell Streets appear to bear the brunt of this increased traffic, with Abbott Street experiencing some impact. A child care centre/pre-school is located on one of the Maxwell Street corners.

This increased traffic impact cannot easily be accommodated in the existing roads. Many of the roads near the proposed development cannot cope now with two-way traffic during busy periods, especially when the roads are also used for on street parking. Should this development proceed, it

would be preferable to build the Quarry Road in the first stage, to minimise impact on residents. As an alternative, traffic calming devices should be installed along Woolls Street, Maxwell Street and Abbott Street, and possibly elsewhere until such time as the Quarry Road is constructed.

### **Community facilities**

The community needs assessment identifies the significant increase in population that Yarralumla and Deakin will experience and that this population is likely to be younger than the current Yarralumla community, creating a new dynamic within the current Deakin and Yarralumla communities. Notwithstanding these identified changes, the report concludes that there is little need for any additional services other than some small shops, privately owned sports facilities such as gyms and a swimming pool and perhaps some child care facilities and medical/allied health services.

Such a conclusion does not seem to make sense and the report should be reviewed. It fails to acknowledge the changing demands over time of the new, younger community. For example the report states that there is no need to set aside land for primary and secondary schools or for youth oriented facilities, and appears to rely on existing facilities being able to accommodate increased demand. The report seems to assume that there will be no other changes in surrounding communities which may increase demand. The report recognises an increased need for aged care facilities but again assumes that current facilities located outside of Yarralumla will be able to cater for this demand. The report also doesn't acknowledge ageing in place strategies and makes no recommendations for housing that can be adapted over time for changing needs due to ageing. The Strategy provides only for 2 to eight storey units with no provision for single storey adaptable housing.

### **Ongoing impact on current residents during development**

Residents who border or are adjacent to the proposed development will experience significant disruption for a 10 year period, with major road and other infrastructure works needed to support the development. The Strategy does not indicate how this impact will be managed or ameliorated during the 10 year period.

### **Reuse of the Brickworks**

One of the original reasons for the development of the Brickworks and environs was to support the adaptive reuse of the area. The Strategy indicates that the ACT Government will stabilise the Brickworks, restore the kilns and develop the proposed Quarry Park. However there is no direct connection between the funds to be raised by the sale of the land for residential/commercial development and the eventual adaptive reuse of the Brickworks. Rather, the adaptive reuse of the Brickworks site is left to the private sector and is part of the third stage of the proposed development. There appears to be little incentive for the private sector to develop the Brickworks and therefore it is unlikely that the original goal of conserving the Brickworks will be realised.

There must be a clearer and stronger connection between the funds generated by the sale of the land and the reuse of the Brickworks site. The development of Quarry Park and associated works should be brought forward to ensure that adaptive reuse of the Brickworks will occur.

**Continued need for community consultation**

Further community consultation on this proposal is needed, given its significant impact on Deakin and Yarralumla. A telephone survey, such as the one disclosed by the LDA just before the conclusion of the submission period, does not substitute for proper consultation with the people most affected by the Strategy. As the CEO of the LDA appeared to foreshadow that the LDA would go ahead with the Strategy on the basis of the survey, it could be argued that the LDA has already made up its mind and the consultation to date is a foregone conclusion. It is a fair question as to why the survey, which does not appear to be on the LDA website, was released just prior to the conclusion of this phase of the consultation.

To date, there has been one community information session on the Strategy (late February). While this event was well attended, many questions were not answered on that day either because staff were too busy or did not know the answers. A more formal meeting during which the LDA could systematically explain the need for the proposed development, the economics of the development and its features is necessary.

We may be contacted by [REDACTED] or on [REDACTED].

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 3 April 2015 10:45 PM  
**To:** Brickworks  
**Subject:** I do NOT support the Brickworks proposal

I just read the article telling us that we all apparently now support the brickworks proposal.

Well I do not support it. And I know many others who don't also.

I do not live in Yarralumla and do not have a vested interest in this decision. I live in Ainslie.

I regard Yarralumla as a very special suburb with considerable charm and history. I am horrified at the proposals to create a new enclave of high density living within Yarralumla - it seems to me grossly unfair that this should be imposed on all those living there, and all those other Canberrans and Australians who visit Yarralumla from time to time, and appreciate it for what it is.

If you want more Kingston Foreshores, Franklins, Harrisons, Craces and Gunghalins etc then go and build them there - in greenfield sites. Please do not ruin one of our most elegant suburbs by this inappropriate development which is far too dense for this most beautiful suburb. And by all accounts this development will impose itself on the elegance of the driveway to the Governor Generals residence. I regard this driveway as a unique feature of Canberra and take all our visitors for a drive there.

The other unfairness of this development is the increase in traffic into a precinct which is busy enough as it is. Whenever I drop into the shops, parking is allways at a premium. Yarralumla already gets a lot of through traffic from the rest of Canberra along streets not really designed for this, with many people driving through the suburb to get to Weston Park, the Yarralumla Nursery and its fantastic coffee shop, the Yacht Club and also its restaurant, boat ramps, golf course as well as the businesses in the shopping centre. This development is as I understand it, to be imposed onto the existing infrastructure of Yarralumla. Not fair.

Please take this development out to a greenfield site where it will fit into the similar suburbs and developments around it. And it it will be fitting into a road network and infrastructure designed and planned for it - not just dumped on roads and infrastructure never intended to cope with something like this.

[REDACTED]