

Treanor, Bronagh

From: Ronan Woods [pdesconsultants@gmail.com]
Sent: 22 May 2018 14:40
To: !devplan
Subject: Draft development plan submissions
Attachments: Planning submission re lands at Edenamo, Inniskeen (PJ & EJ Doherty Ltd).pdf; Planning submission re lands at Church Heath, Castleblayney (JC Developments Ltd).pdf

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Toirleach, Laura & Darina,

Good afternoon and hope all are well.

Please find attached submissions in respect of the following parcels of lands:

- Church Heath at Castleblayney;
- Edenamo at Inniskeen.

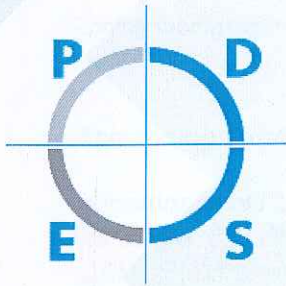
Can you acknowledge receipt for our records?

Kind regards,

SCANNED

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CHARTERED PLANNING CONSULTANTS

SCANNED

**PLANNING SUBMISSION RE
DRAFT MONAGHAN COUNTY
DEVELOPMENT PLAN 2019-2025**

In respect of
**LANDS AT CHURCH HEATH,
CASTLEBLAYNEY**

Prepared by
PDES PLANNING CONSULTANTS

On behalf of
JC DEVELOPMENTS LTD

MAY 2018

1.0 Introduction

We have been instructed to make this submission on behalf of our client, JC Developments Ltd, in respect of lands at Dundalk Road, Castleblayney. This submission is made in response to the public notice dated 15th March 2018, inviting submissions up until 25th May 2018 in relation to the draft Monaghan County Development Plan 2019-2025.

In summary, this submission requests the following:

-That the Planning Authority amend the proposed zoning of the subject lands of 3.0 ha from 'Strategic Residential Reserve' to 'Proposed Residential'.



Figure 1: Subject lands for reference purposes (source: arcgis map viewer)

The zoning as per the published draft plan is set out below.

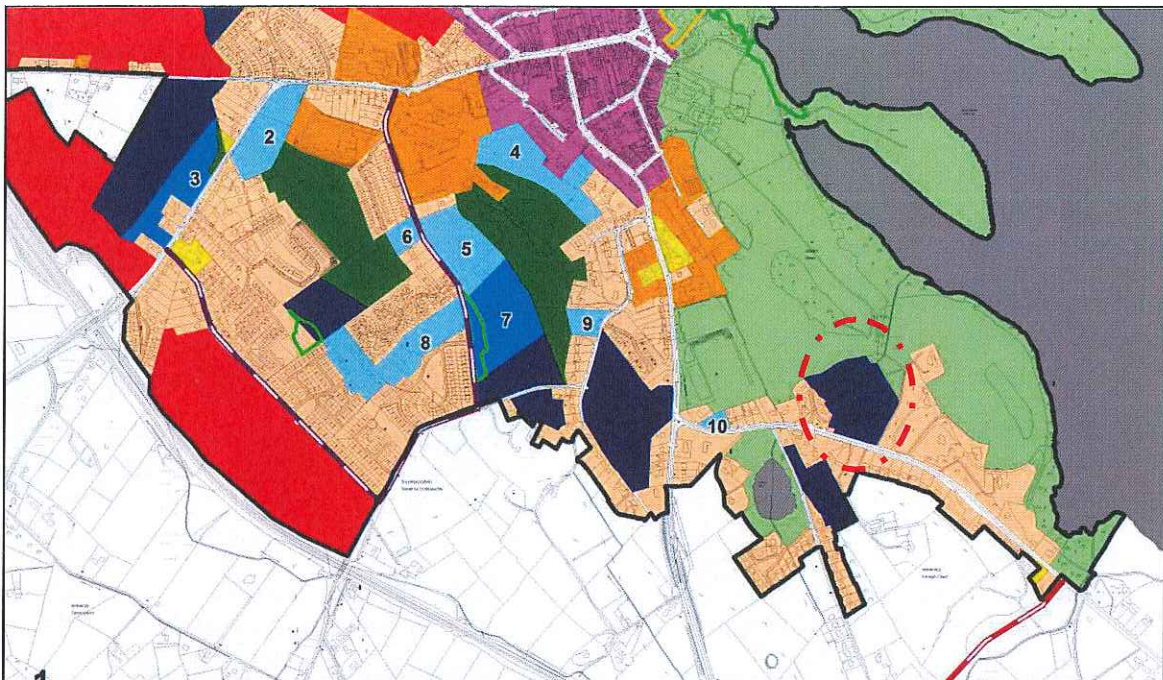


Figure 1 Zoning map as per draft Monaghan County Development Plan 2019-2025 showing the subject lands, with the proposed re-zoning from 'proposed residential' to strategic residential reserve

For reference, our client purchased the subject lands in late 2017 with an intent that housing units be provided on-site as soon as practicable. Notwithstanding the long-standing brownfield nature of the site since 2006, this current state was due to the previous developer(s) being halted due to the economic down-turn and associated collapse in the house-building sector.

We set out that our client's firm intentions are for planning to be granted in 2018 and construction works to also commence in 2018.

This submission is to be read in this context and the policy context provided by the National Planning Framework which encourages sustainable use of such 'brownfield' urban lands.

2.0 Current planning context

The subject lands are considered to be appropriately zoned as 'proposed residential' under the 2013-2019 Plan.

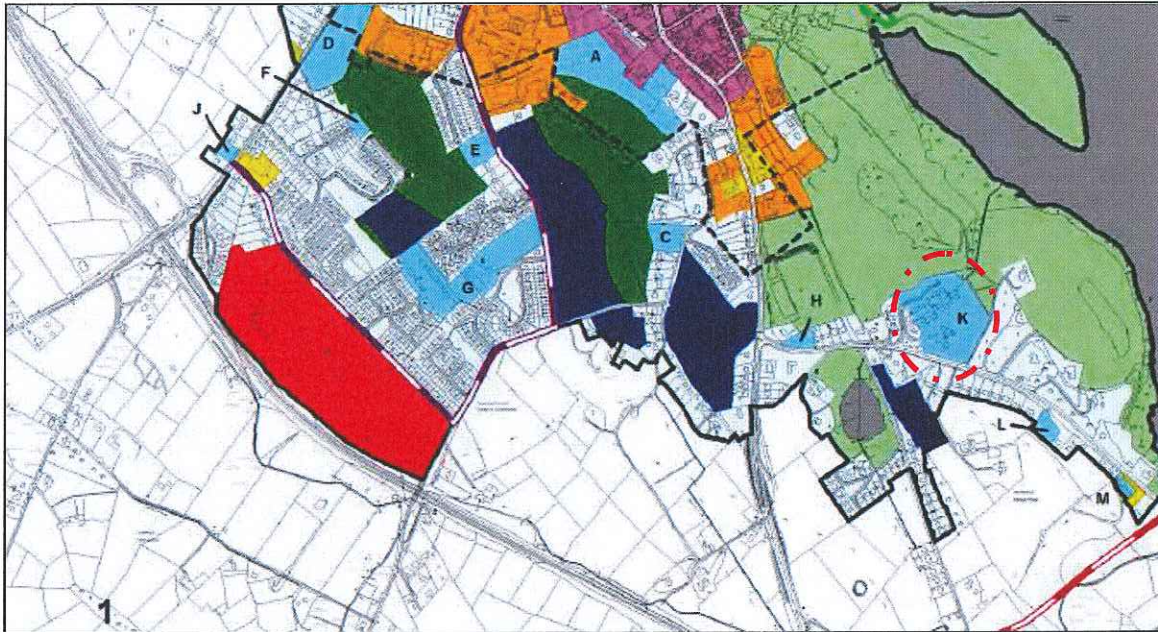


Figure 2 Zoning map as per Monaghan County Development Plan 2013-2019 showing the subject lands. The current zoning as relates to the lands is 'proposed residential' (source: Monaghan County Development Plan 2013-2019)

We consider this zoning is appropriate given the 'brownfield status' of the subject lands; specifically:

- access roads and hardcore surfacing works are provided within the site pursuant to permission 00/1184 (albeit since expired);
- an existing entrance is provided to serve the lands under permission 00/1184;
- existing footpaths are provided to serve the lands under permission 00/1184;
- site preparation works have been implemented pursuant to 00/1184 with storm networks installed within the site;
- the site is fully serviced with an existing foul pumping station and ESB connection available.

Further, on referencing the core strategy incorporated into the 2013-2019 County Development Plan, we note:

- 18.34 ha of lands were zoned as proposed residential in Castleblayney town.
- population projections for Castleblayney were forecast to fall by 21.7% between 1996 & 2021 (based on assumptions set out under table 3.9 of the 2013-2019 County Development Plan)

In planning terms, we consider the previous estimate in terms of 'population decrease' was based on a period of economic recession and associated net migration due to high levels of unemployment. In this context, given the 'depressed population growth rates' we consider the 2013-2019 County Development Plan adopted the correct approach in ensuring

adequate lands were zoned to ensure population growth within the town was facilitated and represented a sustainable zoning for re-use of brownfield lands. The zoning as currently relates under the 2013-2019 Development Plan for Castleblayney is therefore considered appropriate, as a minimum in terms of overall hectares for residential purposes.

Also, given the low levels of housing constructed in urban areas throughout the county in the last ten years, it is noted that currently 37% of the county's population are based in designated urban settlements, which remains below the state average.

This unsustainable approach of excessive persons living in rural areas is recognised under the Regional Planning Guidelines wherein it states "*Dispersed settlement patterns and low population density pose significant challenges from an infrastructure and service delivery perspective. However, population growth has mainly taken place on the periphery of towns and villages, often at the expense of the urban core. This pattern of development and sprawl creates significant challenges for the delivery of services within local authorities*".

Whilst market fundamentals and the economic collapse over the last few years rendered housing development construction to be unviable, this is a scenario that now requires attention; both in land-use planning terms and in terms of actual units as now required and should be provided for through the development plan process in urban areas.

In this context we note the strategic core strategy policies put forward in the draft plan (CSP1-CSP8) recognise this need to strengthen the towns/settlements and we consider these strategic objectives to be appropriate.

In response we submit the role of the draft 2019-2025 Monaghan County Development Plan and the core strategy set out therein should be to address this unsustainable urban vs rural population divide and instead provide for sustainable use of lands in urban locations, particularly on lands such as our clients which are already serviced and 'brownfield'.

4.0 Site context

In terms of context we submit the subject lands are conveniently located adjacent to the existing public roads, offering direct access to the National road network connecting to Dundalk and beyond. It is a strategically well-located site.

The subject lands are also within walking distance of Castleblayney town centre, nearby schools, Muckno park area(s) and Concra wood golf club.

The zoning of the lands for proposed residential will be consistent with the urban form as established and not represent urban sprawl, given existing developments are located at further distance(s) from the town centre boundaries and the nearby amenities aforementioned.

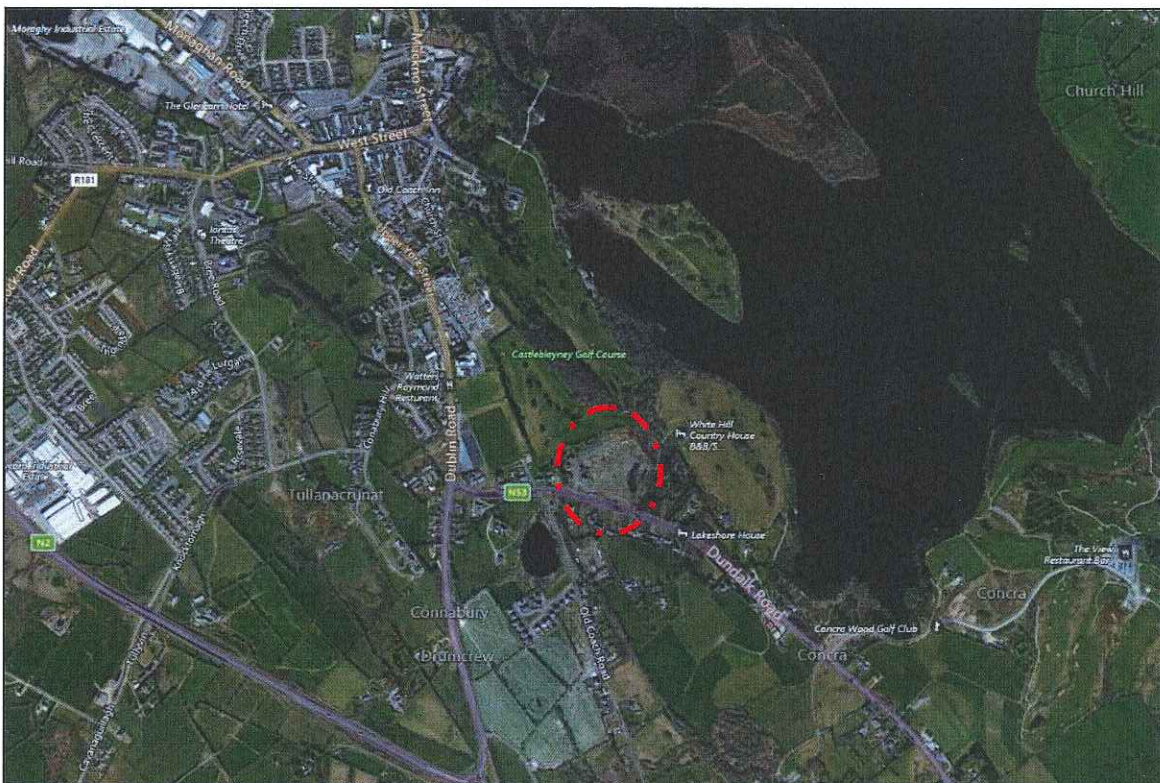


Figure 5 Location map showing the submission lands in the context of Castleblayney (source: arcgis map viewer)

We submit the subject lands are therefore to be regarded as 'serviced lands' as defined in appendix 1 of the National Planning Framework and should be given priority in terms of zoning through the development plan process.

5.0 Other matters

We note under the 2013-2019 County Development Plan the following zonings in Castleblayney provide for:

- 18.34 ha for proposed residential
- 91 ha for industry, enterprise & employment.

However on review of the draft 2019-2025 County Development Plan as published the comparative zonings provide for:

- 16ha in total for proposed residential (which also incorporates phasing provisions under 'residential B' and 'strategic residential reserve'; as per table 2.5 of the draft plan)
- 127 ha for industry, enterprise & employment.

In response, we submit:

- The increase in zoning for industry, enterprise & employment from 91ha under the 2013-2019 County Development Plan to 127 ha as now proposed under the draft 2019-2025 County Development Plan represents a 38.46% increase in lands for industry, enterprise & employment;
- This 38.46% increase in lands for industry, enterprise & employment is welcomed and will facilitate a sustainable use of urban lands. However, to facilitate any increase in employment uses or zonings within Castleblayney, it is also proper planning to facilitate provision of adequate lands for future residential purposes. In this regard we submit the incorporation of residential sequential zonings as proposed is both too restrictive and not reflective of actual land availability going forward.

5.1 National Planning Framework

The National Planning Framework sets out strategic objectives which Planning Authorities are to have regard to. Specifically we highlight:

Objective 3a *"To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements"*.

Objective 5 *"To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity"*.

Objective 7 *"Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities"*; and

"Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth".

"In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth".

Of note to our submission is section 4.5 of the NPF which states **"The NPF targets a significant proportion of future urban development on infill/brownfield development**

sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village”.

Also of relevance is under appendix 3 of the NPF which sets out a tiered approach to zoning of lands. In summary:

- (I) Serviced lands should be identified;
- (II) Servicable lands should be identified.

We submit the NPF sets out a clear policy direction for strengthening of existing urban areas and a move away from rural based one-off housing. Use of infill/brownfield sites is advocated and the tiered approach to zoning of lands set out.

Planning Authorities through the plan process should identify 'serviced lands' and consider same as a priority through the development plan process.

We submit this is considered to be sustainable in planning and land-use terms and sets a clear policy context which Core Strategies should be based on by all Planning Authorities.

5.2 Core Strategy

5.21 Overview

We note the draft County Development Plan 2019-2025 incorporates the core strategy pursuant to the requirements of Section 10 of the Planning and Development Acts. The strategic objectives are noted which in the broadest sense are to provide for new development in a sustainable manner.

In light of the NPF as published, we submit the rationale and zoning provisions set out in the Core Strategy should be revised, particularly given the policy context provided by the NPF which seeks to strengthen urban areas and existing lands.

We note the requirement of the Core Strategy to be consistent with the Border Regional Planning Guidelines, and the population growth forecasts set out therein for the County. However, we consider the draft County Development Plan 2019-2025 should:

- place greater emphasis on zoning lands in existing urban areas;**
- place greater restrictions on single rural housing.**

This approach will allow for the population growth forecasts for the County as set out the RPG's to be adhered to; and also ensure that the NPF objectives are met; ie objectives 3, 5 & 7 of the NPF as previously identified to be met.

Further, we also submit the assumed population growth of 1.04% is considered to be too conservative and is based on 'distorted' local population growth rates which occurred during the 2008-2015 economic recession, when net migration was ongoing due to unemployment.

In this context we highlight the document as published "*Prospects for Irish Regions and Counties*" as published January 2018 (by the ESRI in conjunction with the NPF publication) which provides detailed up-to-date analysis of population growth rates. Specifically we highlight the following tables as extracts:

TABLE 3.1 AVERAGE ANNUAL POPULATION GROWTH BY REGION AND PERIOD (%)

	1991-1996	1996-2002	2002-2006	2006-2011	2011-2016	1991-2016
Border	0.2	1.0	2.1	2.0	0.3	1.2
Midland	0.3	1.6	2.9	2.4	0.7	1.8
West	0.5	1.3	2.2	1.5	0.4	1.3
Dublin	0.6	1.0	1.4	1.4	1.1	1.2
Mid-East	1.4	3.1	3.8	2.3	1.1	2.9
Mid-West	0.4	1.2	1.6	1.0	0.3	1.0
South-East	0.4	1.4	2.2	1.6	0.5	1.3
South-West	0.5	1.0	1.8	1.4	0.8	1.2
State	0.6	1.3	2.1	1.6	0.7	1.4

Source: Author's calculations using CSO Census of Population data.

Table 2 Average annual population growth by region and period (Source: *Prospects for Irish Regions and Counties* table 3.2)

TABLE 3.2 AVERAGE ANNUAL POPULATION GROWTH BY COUNTY AND PERIOD

	1991-1996	1996-2002	2002-2006	2006-2011	2011-2016	1991-2016
Carlow	0.3	1.8	2.4	1.7	0.8	1.6
Dublin	0.6	1.0	1.4	1.4	1.1	1.2
Kildare	2.0	3.6	3.4	2.6	1.1	3.2
Kilkenny	0.5	1.1	2.2	1.8	0.8	1.4
Laois	0.2	1.8	3.5	4.0	1.0	2.5
Longford	-0.1	0.5	2.7	2.7	0.9	1.4
Louth	0.3	1.7	2.3	2.1	0.9	1.7
Meath	0.8	3.7	5.4	2.6	1.2	3.4
Offaly	0.2	1.3	2.8	1.6	0.3	1.3
Westmeath	0.5	2.2	2.6	1.7	0.5	1.7
Wexford	0.5	2.0	3.2	2.1	0.6	1.9
Wicklow	1.1	1.9	2.5	1.7	0.8	1.9
Clare	0.7	1.6	1.9	1.1	0.2	1.2
Cork	0.5	1.1	1.9	1.6	0.9	1.3
Kerry	0.7	0.8	1.4	0.8	0.3	0.8
Limerick	0.4	1.0	1.2	0.8	0.4	0.8
Tipperary N.R.	0.1	0.9	2.1	1.3	0.3	0.9
Tipperary S.R.	0.2	0.8	1.3	1.3	0.1	0.8
Waterford	0.7	1.2	1.6	1.1	0.5	1.1
Galway	0.9	1.8	2.7	1.6	0.6	1.7
Leitrim	-0.2	0.5	3.1	2.0	0.1	1.1
Mayo	0.1	0.9	1.4	1.1	0.0	0.7
Roscommon	0.0	0.6	2.3	1.8	0.1	1.0
Sligo	0.4	0.7	1.2	1.5	0.0	0.8
Cavan	0.1	1.1	3.3	2.9	0.8	1.8
Donegal	0.3	1.0	1.8	1.9	-0.3	1.0
Monaghan	0.0	0.4	1.6	1.6	0.3	0.8
State	0.6	1.3	2.1	1.6	0.7	1.4

Table 3 Average annual population growth by region and period (Source: *Prospects for Irish Regions and Counties* table 3.2)

As can be seen from the above tables, the average annual growth rate for the Border region was 2.0% pre-recession, and in Monaghan the growth rate was 1.6%. Notably this research is up-to-date and more relevant than 'projections' as set out in the RPG's dated 2010, as it takes into account census data of 2011 & 2016.

Also of note is the growth rate at state level during the recession 2011-2016 which is detailed at 0.7%. In the broadest sense this is largely attributable to net migration and the recession.

In this context and the vastly improved economic scenario we consider the assumed growth rate of 1.04% as set out in the draft plan is therefore too restrictive, with the consequence that inadequate lands have been proposed for housing in the broadest sense.

We submit a revised assumed population growth projection for the county should therefore be revised upwards to at least 1.6%, given the vastly improved economic conditions which result in improved employment prospects and the associated improvement in bank lending for provision of housing units. We highlight this suggested growth rate is based on reference to what has been the historical growth rates for the county as shown in table 3 above.

In accordance with objectives 3, 5 & 7 of the NPF, we also consider this % increase should be prioritised in terms of allocating lands for housing within existing urban areas; ie. at least 40% to be provided for in existing urban areas as per the NPF objectives.

At a County level the Core Strategy and rural housing policy should therefore be configured to encourage at least 40% of future population growth and housing requirements into urban areas.

5.22 Core strategy implications for Castleblayney

On referencing the core strategy statement as set out in the draft plan, we note population growth projections are provided for the population to grow to 4237 by 2025. (ie 630 persons over a six year period). In the broadest sense we consider this results in a lack of lands being zoned as available for either residential 'A' or 'B' as set out in the core strategy both due to:

- the 1.04% assumed growth rate suggested provides for 630 persons over a six year period; and also
- the revised policy direction with the NPF sets out under objective 3a "*To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements*" which has not been factored into the core strategy to date.

In response we suggest the following be addressed at plan preparation stage:

- Of note is figure 3.2 in the Regional Planning Guidelines which sets out the population targets for the county until 2022. Specifically it sets out that by 2022 the target population for the county is **71,400**.

We highlight this to demonstrate both the target population by 2022 as per the RPG's and also for the Planning Authority to note that the draft plan is required to allocate lands beyond 2022; ie until 2025. We submit that applying an assumed growth rate of 1.04% therefore has implications that the core strategy would not be consistent with the RPG's and population targets set out therein.

- We highlight the specific policies as set out in the RPG's to be complied with; namely CSP4-CSP10. The target population as set forward in the Core Strategy and HLR's are therefore considered to fall short of what is envisaged by the RPG's.

In response to the NPF and the target population set out in the RPG's we submit:

- At a county level under the core strategy, the population allocation/HLR's should be consistent with objective 3a of the NPF in the first instance; ie at least 40% of population growth/HLR calculations to be allocated primarily to existing urban settlements.
- HLR's in existing urban areas should be prioritised in land-use terms and policy change incorporated into the development plan for all rural housing applications so that 'actual need' is incorporated into rural housing policy; this is consistent with the Section 28 Guidelines 'Sustainable Rural Housing: Guidelines for Planning Authorities'.
- The growth rate for the county should be increased to a minimum of 1.6% per annum; **this equates to a total of 70,813 persons at county level by 2025.**
- This represents an increase at county level of 3561 above the figures at county level as suggested in table 2.0 of the core strategy. (ie 70,813 rather than the stated 67,252 population target).

		Assuming a 1.04% per annum growth	Assuming a 1.6% per annum growth	RPG Target Population
Current Position	2016 Population	61,386 persons	61,386 persons	66,124
Plan Period Projected Growth 2019-2025	Total Population of County by 2025	67252 persons	70,813 persons (by 2025)	71,400 (by 2022)

Table 3 Population growth based on a 1.6% per annum (compound)

Applying our suggested population increase rate of 1.6% has implications for the Housing Land Requirement for all settlements in the county. Specifically in terms of Castleblayney town we submit:

- The population target of 70,813 results in a forecast population increase within Castleblayney town to increase to 4461 persons (based on an allocation 6.3% of county population as per table 2.1 of the core strategy).
- This is above calculations as forecast by an additional minimum of 225 persons (ie. 854 persons increase in total rather than 629 as forecast).
- A population target increase of 854 persons for Castleblayney town results in a requirement for at least 310 housing units; (ie. based on an assumed household size of 2.75 persons as stated by the CSO in 2017)

In total, we submit a 310 housing unit requirement for Castleblaney Town equates to 18.8 ha of zoned lands for 'proposed residential'. (based on an average density throughout residential lands of 16.5 units per ha).

This results in a housing land requirement within Castleblaney town of at least 18.8ha, rather than 16ha as proposed in the draft plan.

We also submit the HLR requirement of 18.8ha fails to take account of any 'low density' or 'serviced site' zonings which may be below a density of 16.5 units per ha.

5.23 Housing Land Requirements

Further, in terms of actual lands identified under the draft County Development Plan 2019-2015, we note the HLA (16ha) for Castleblaney is not reflective of what lands are actually available for future development.

For due consideration we highlight the following analysis of a sample of the sites and how they should not be included as either 'proposed residential' or 'residential 'B' under the proposed development plan. Specifically:

- Site '2' as referenced below has already obtained permission for development under reference 17/218 and is due for construction to commence in 2018; it cannot be regarded as 'future available lands'.
- A significant portion of site '3' as referenced below encompassing circa 2ha acres has been acquired by the Department of Education for a school; it cannot be regarded as lands available for residential purposes. Assuming a density of 7.5 units per acre; this equates to lands being required elsewhere within Castleblaney for 30no. units.
- Site '8' as referenced below has already obtained permission for development under reference 17/349 and is due for construction to commence in 2018; it cannot be regarded as 'future available lands'.

We highlight the RPG's covers such a scenario; ie lands that are already 'committed' via permission(s). Specifically section 3.7.7.1 of the RPG's states "It must be noted that the housing land requirements outlined in table 3.9 are in addition to the significant vacant residential stock and planning permissions granted for residential units that are yet to be completed or built".

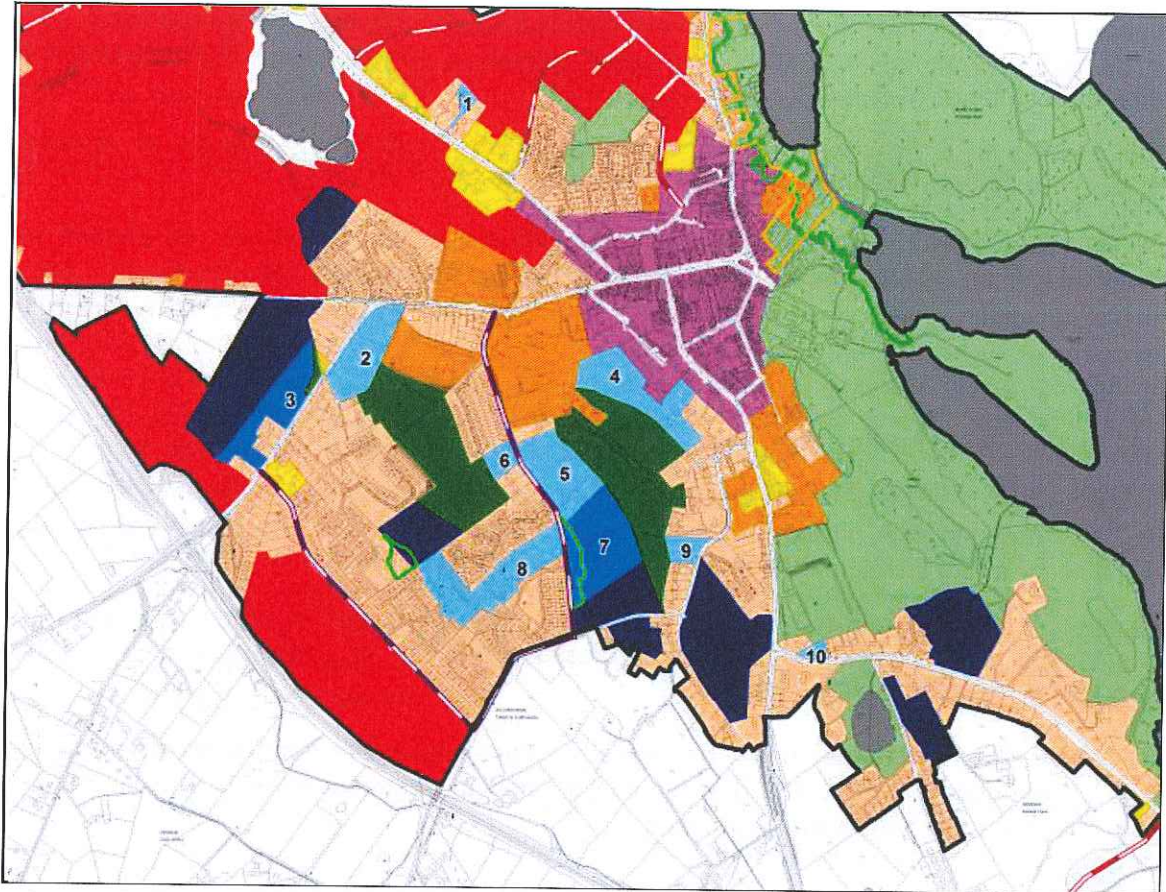


Figure 6 Overview of proposed residential zonings as published in the draft County Development Plan 2019-2025

Further, in terms of actual population forecasts and HLR's we submit:

- Developments approved on sites '2' and '8' as above provide for a total of 79 dwellings under the provisions of the 2013-2019 core strategy. These developments when constructed will provide for a minimum of 228 persons (ie. 2.75 x 79 units when occupied).
- Developments approved on sites '2' and '8' above will provide for additional population increases which has not been factored into growth projections for Castleblayney Town; the assumption that a population growth rate of 1.04% as set out in the Core Strategy is therefore already inaccurate.
- 228 persons represent 36% of the Core Strategy allocation for Castleblayney town for the period 2019-2025; these land parcels under sites '2' and '8' should therefore not be included in the Core Strategy going forward for the draft 2019-2025 Development Plan.
- Sites '2' and '8' represent circa 4.56 ha. Alternative parcels of land of at least 4.56 ha (in addition to our suggested uplift in population projections as above) should therefore be identified elsewhere in Castleblayney to facilitate 'first phase' future housing land requirements as set out in the core strategy.

- The core strategy should also take into account the facts that an additional school is proposed on lands at the Shercock road (site '3'; circa 2ha) and the associated increase in population forecasts is recognised by the Department of Education in their 'need assessment' for Castleblayney.

In summary, we consider the Housing Land Requirement of 16ha is too restrictive and fails to correlate with the 38.46% increase in lands zoned for Industry, enterprise & employment as provided for in Castleblayney.

We consider that the 16ha as designated is not considered sufficient and also overlaps with existing developments which have permissions in place.

Further, the incorporation of 'strategic residential reserve' should be omitted from the core strategy approach. A market for 'serviced sites' exists locally, and should be considered as an alternative to 'strategic residential reserve'. This will facilitate an alternative to rural housing and be more sustainable.

We submit the Housing Land Requirement for Castleblayney should therefore be revised to:

- **Provide for at least 18.8ha of lands for 'proposed residential' as first phase residential;**
- **Provide for alternative lands within the settlement envelope to compensate for sites '2' and '8' which represent circa 4.56 ha (in addition to our suggested uplift in population projections/HLR's as above).**
- **Provide for brownfield sites (such as our clients) to be zoned as 'proposed residential' and given priority in terms of zoning allocation(s). This is consistent with the NPF and also the RPG's.**
- **Provide for 'serviced sites' in suburban locations as an alternative to one-off rural housing.**

6.0 Summary & conclusions

This submission relates to the parcel of lands as identified at Dundalk Road, Castleblayney. In summary, this submission requests the following:

- The growth rate for the County should be increased to a minimum of 1.6% per annum; **this equates to a total of 70,188 persons at County Level by 2025.**
- A population target increase of 854 persons for Castleblayney town results in a requirement for at least 310 housing units; (ie. based on an assumed household size of 2.75 persons as stated by the CSO in 2017)
- This represents an additional 225 person increase which has not been factored into the core strategy HLR for Castleblayney town.
- We submit a 310 housing unit requirement for Castleblayney town equates to 18.8 ha of zoned lands for 'proposed residential'. (based on an average density throughout residential lands of 16.5 units per ha).
- In terms of actual lands identified under the draft County Plan 2019-2015, we note the HLR allocation (16ha) for Castleblayney is not reflective of what lands are actually available for future development. Alternative lands of 4.56 ha are required to compensate for sites '2' and '8'.
- Our client's lands are to be regarded as 'brownfield'. We highlight objective **CSP 11 as set out in the RPG's** wherein the policy directive sets out where it is proposed to exclude brown field sites from the aforementioned Housing land Requirement, justification must be provided for its exclusion. We submit there is no basis for our clients lands to be excluded from a proposed residential zoning. Hard-core surfacing as laid previously along with site services render the site as appropriate for development. This has been confirmed by the appointed consultant engineers. Existing saplings and vegetation which has grown on-site in the last three years will be removed as part of site works pursuant to a permission.

In summary we request that **the Planning Authority amend the proposed zoning for the subject lands of 3.0 ha from 'Strategic Residential Reserve' to 'Proposed Residential A'**.

This is on the basis that it is a brownfield site, fully serviced, appropriately located and on the basis that it was previously identified as 'proposed residential' under the 2013 County Development Plan.

We submit the proposed 'strategic residential reserve' as proposed in the draft plan is a backward step from the previous zoning which relates. Such an approach is clearly contrary to the objectives of the National Planning Framework.

We submit the zoning of our clients lands as 'proposed residential' is consistent with objectives 3, 5, 7 and section 4.5 of the National Planning Framework.

Zoning submission re lands at Church Heath, Castleblayney town

In conclusion, there should be a provision of 'head-room' to allow for market choice; ie particularly given the fact that 'land hoarding' takes place in such urban locations. On the basis of our client applying for permission in 2018 to 'build-out' this brownfield site, this commitment should be facilitated going forward in zoning terms.

Given the acute housing shortage that is now apparent both within the County and further afield, zoned lands should be the priority for housing allocations going forward; this is an urgent requirement.

We trust the Planning Authority will have regard to the contents of this submission in it's preparation of the Monaghan County Development Plan 2019-2025.

Yours sincerely,



Ronan Woods

Director/MIPI