



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

2nd February 2024

Kieran O'Donnell TD

Minister of State for Local Government and Planning

Department of Housing, Local Government and Heritage

Custom House

Dublin 1

D01 W6X0

BY HAND AND BY EMAIL

**Re: Notice Pursuant to section 31AO(7) of the Planning and Development Act
2000 (as amended) – Athenry Local Area Plan 2024-2030**

A chara,

I am writing to you in relation to the recent adoption by the elected members of the Athenry Local Area Plan 2024-2030 (the 'Local Area Plan') by the elected members of Galway County Council (the 'Council').

In particular, I am writing to you in the context of the statutory duty of the Office of the Planning Regulator (the 'Office') pursuant to section 31AO(7) of the *Planning and Development Act 2000* (as amended) (the 'Act') to issue a Notice to you on the basis that, having considered the Local Area Plan, the Office is of the opinion that:

- a) the Local Area Plan has not been made in a manner consistent with recommendations of the Office, dated the 7th July 2023 and the 3rd November 2023, which required specific changes to the Local Area Plan to ensure consistency with the core strategy of the Galway County Development Plan 2022 – 2028 (the 'County Development Plan'), regional policy objectives (RPOs) of the North Western Regional Assembly Regional Spatial and Economic Strategy (RSES) in respect of compact growth (RPO 3.1, RPO 3.2), and having regard to the policy and objective for the sequential approach to zoning in the *Development Plans, Guidelines for Planning Authorities* (2022) (Development Plans Guidelines).

Specifically, the Local Area Plan includes extensive areas of land zoned R – Residential (Phase 1) and R – Residential (Phase 2), in peripheral locations outside the CSO settlement boundary, often with inadequate infrastructure including a lack of footpath connection to the town, and which leapfrogs unzoned and/or undeveloped zoned land and, in so doing, does not apply the sequential approach to development to support the sustainable compact growth of the town and its environs;

- b) the decision of the Council results in the making of a local area plan in a manner that is inconsistent with the recommendations of Office, and with the objectives of the development plan, its core strategy and the Regional Spatial and Economic Strategy contrary to the requirements of section 19(2) of the Act; and
- c) the use by you of your function to issue a direction under section 31 of the Act would be merited.

The reasons for the opinion of the Office are set out in further detail in section 2 of this letter. This letter is a Notice to you pursuant to section 31AO(7)(i) of the Act.

1. Background

1.1 Draft Athenry Local Area Plan 2023-2029

The Draft Athenry Local Area Plan 2023-2029 (the 'draft Local Area Plan') was on public display from the 25th May 2023 to the 7th July 2023.

The Office made a submission on the draft Local Area Plan dated 7th July 2023 containing three (3) recommendations and six (6) observations. Specifically, issues related to:

- Recommendation 1 Residential Land Use Zoning (infrastructure assessment);
- Recommendation 2 Strategic Flood Risk Management; and
- Recommendation 3 Lands Zoned for Employment Uses.

1.2 Material Alterations to the Draft Athenry Local Area Plan 2023-2029

The elected members, having considered the draft Local Area Plan and the Chief Executive's (CE's) Report on the public consultation regarding the draft Local Area Plan, resolved to alter the draft Local Area Plan. The material alterations to the draft Local Area Plan were on public display from the 5th October 2023 to the 3rd November 2023.

The material alterations included:

- a series of individual material alterations relating to the zoning of land as Residential, including Residential Phase 1, Residential Phase 2 and Existing Residential, and in particular, included:
 - proposed material alterations MA 5, MA 46, MA 47 and MA 49 – from Outside the Settlement Boundary to Residential Phase 1, and material alteration MA 51 from Outside the Settlement Boundary to Residential Phase 2;
 - proposed material alterations MA 41, MA 43 and MA 65 – from Agriculture to Residential Phase 1, and material alterations MA 24 and MA 60 from Agriculture to Residential Phase 2;
 - proposed material alteration MA 40 – from Residential Phase 2 to Residential Phase 1;
 - proposed material alterations MA 50 and MA 59 – from Open Space/Recreation & Amenity to Residential Phase 2; and
 - proposed material alteration MA 48 – from Outside the Settlement Boundary to Existing Residential;
- a series of individual material alterations relating to the zoning of land as Business and Enterprise, and Industrial, and in particular, included:
 - proposed material alteration MA 54 – from Agriculture to Business and Enterprise; and
 - proposed material alterations MA 55, MA 56, MA 58 and MA 64 – from Outside the Settlement Boundary to Industrial.

The Office made a submission dated 3rd November 2023 on the material alterations to the draft Local Area Plan containing three (3) recommendations and one (1) observation.

The Office's recommendations at MA stage included:

- MA Recommendation 1: Land Use Zoning for Residential Use
- MA Recommendation 2: Lands Zoned for Employment Uses
- MA Recommendation 3: Flood Risk Management.

1.3 Adopted Athenry Local Area Plan 2023-2029

The elected members of the Council resolved to make the Local Area Plan at a special meeting on the 9th January 2024.

Subsequently, the Chief Executive sent a letter dated 15th January 2024 (which the Office has interpreted as the notice required under section 31AO(5) of the Act, hereinafter ('the 31AO(5) notice letter') advising of the making of the Local Area Plan. The 31AO(5) notice letter sets out the recommendations of the Chief Executive, in relation to the Office's recommendations to the material alterations to the draft Local Area Plan, and includes the elected members' reasons, for not complying with the majority of MA Recommendation 1 and also MA Recommendation 2.

It should be noted that the section 31AO(5) notice letter does not address the recommendations of the Office in respect of the draft Local Area Plan, or identify the recommendations not complied with.

1.3.1 Draft Local Area Plan recommendations

Having reviewed the adopted Local Area Plan, the Office is satisfied that Recommendations 1 and 2 of the Office's submission to the draft Local Area Plan have been addressed to the satisfaction of the Office, but considers that Recommendation 3 has not been complied with, in part or in full.

Recommendation 3

Recommendation 3 of the Office's submission to the draft Local Area Plan refers to the absence of a robust evidence-based justification for the extent, location and infrastructural capacity of enterprise/employment zoned land in the town. This is discussed further below in the context of MA Recommendation 2.

1.3.2 Material Alterations recommendations

The section 31AO(5) notice letter stated that the following recommendations of the Office made at Material Alterations stage had not been complied with, in part or in full:

MA Recommendation 1

MA Recommendation 1 related to a significant number of proposed individual zonings which significantly increased the quantum of land zoned R – Residential (Phase 1) and R – Residential (Phase 2). All material alterations were adopted by the planning authority. It is considered that MA Recommendation 1 has not been complied with in full. This is discussed further below.

MA Recommendation 2

MA Recommendation 2 related to material alterations in relation to zoning for employment uses. The Office raised concerns, in its submission to material alterations to the draft Local Area Plan, with the extensive scale of land zoned for employment uses without an evidence-based rationale to demonstrate the need for such extensive lands in accordance with section 6.2.5 of the Development Plans Guidelines.

The elected members did not accept the recommendation of the Chief Executive and OPR in relation to these specific material alterations.

The Office considers, however, that there is insufficient basis to make a recommendation to the Minister to issue a draft Direction in respect of this matter.

1.3.3 Outstanding Matters

Having reviewed the CE's Report (August 2023), the notice of the publication of the material alterations, the CE's Report (November 2023), and the section 31AO(5)

notice letter regarding the making of the Local Area Plan, the Office has concluded that, with the exception of the below, the recommendations of the Office have been responded to and/or have been addressed to the satisfaction of the Office, or are otherwise considered satisfactory within the legislative and policy context.

The outstanding matters, therefore, are as follows:

- MA Recommendation 1.

This outstanding matter is considered in more detail below.

1.4 MA Recommendation 1 - Land Use Zoning for Residential Use

MA Recommendation 1 of the Office's submission to the material alterations to the draft Plan required the planning authority make the Local Area Plan without fourteen (14) land-use zoning amendments.

MA Recommendation 1 – Land Use Zoning for Residential Use states the following:

Having regard to the provision of new homes at locations that can support compact and sustainable development, and in particular to the following:

- *the core strategy of the Galway County Development Plan 2022-2028;*
- *national and regional policy objectives NPO 3, RPO 3.1 and RPO 3.2 for compact growth;*
- *the peripheral location of the lands and the policy and objective for the sequential approach to zoning in the Development Plans, Guidelines for Planning Authorities (2022); and*
- *NPO 72a-c and Appendix 3 of the NPF for the co-ordination of land use zoning, infrastructure and services,*

the planning authority is required to make the LAP without the following proposed Material Alterations:

- (i) *MA5 – Outside the Settlement Boundary to Residential Phase 1;*
- (ii) *MA24 - Agriculture to Residential Phase 2;*
- (iii) *MA40 – Residential Phase 2 to Residential Phase 1;*

- (iv) *MA41 – Agriculture to Residential Phase 1;*
- (v) *MA43 – Agriculture to Residential Phase 1;*
- (vi) *MA46 – Outside the Settlement Boundary to Residential Phase 1;*
- (vii) *MA47 – Outside the Settlement Boundary to Residential Phase*
- (viii) *MA48 – Outside the Settlement Boundary to Residential Existing;*
- (ix) *MA49 – Outside the Settlement Boundary to Residential Phase 1;*
- (x) *MA50 – Open Space/Recreation & Amenity to Residential Phase 2;*
- (xi) *MA51 – Outside the Settlement Boundary to Residential Phase 2;*
- (xii) *MA59 – Open Space/Recreation & Amenity to Residential Phase 2;*
- (xiii) *MA60 – Agriculture to Residential Phase 2; and*
- (xiv) *MA65 – Agriculture to Residential Phase 1.*

The CE's Report recommended that the planning authority comply with MA Recommendation 1 with the exception of **MA 5** and **MA 24**. The elected members decided to accept the Chief Executive's recommendation in relation MA 5 and MA 24. However, the elected member's rejected the Chief Executive's recommendation to make the Local Area Plan without all the other material alterations in MA Recommendation 1

With regard to the remainder of the sites (12 in total), the reasons given in the section 31AO(5) notice letter for the elected members rejecting the Chief Executive's recommendations generally varies for each individual material alteration. The elected members' specific reasons in relation to the individual material alterations are set out below.

With regard to **MA 5**, the Office recommended that this site be omitted. This is a greenfield site, currently in agricultural use, located on the southern periphery of the settlement to the immediate south of the existing housing estate, Pairc Na hAbhain. The size of the site measures approximately 0.6 ha. The Chief Executive's reason for retaining MA 5 includes:

This Material Alteration was a consequence of the reallocation of Residential Phase 1 lands in accordance with the Core Strategy of the GCDP 2022 –

2028). It is considered appropriate to retain MA5 as Residential Phase 1. The subject lands are council owned land, and it is envisaged that housing units will be planned on these lands in the future.

The Office considers, on balance, and having regard to the assessment contained in Appendix E Infrastructure Assessment Proposed Residential Lands (the 'Infrastructure Assessment') which records the site as fully serviced, and the potential access from the existing housing estate, a recommendation to the Minister is not warranted in this case.

With regard to **MA 24**, this site is located to the north of the town centre and the Office considers that, on balance, having regard to the commitment to prepare a Urban Framework Plan for all the lands in the area (Policy Objective ASP 6 Urban Framework Plan), a recommendation to the Minister is not warranted. In relation the MA 24, the Chief Executive's reason for retaining MA 24 is stated:

It was considered appropriate to rezone these lands Residential Phase 2 as a result of the commitment from the Planning Authority to prepare a Urban Framework Plan for all of the lands in this area. See Policy Objective ASP 6 Urban Framework Plan in Residential Phase 2 lands (Caheroyn).

With regard to **MA 40, 41, 43**, the subject lands comprise three (3) separate plots situated along the western periphery of the settlement, immediately west of the railway line and to the east of the R348.

The elected members rejected the Chief Executive's recommendation to make the Local Area Plan without these three amendments for the following reasons:

- *Lands have been the subject of a previous grant of permission for housing. (59 units).*
- *Lands are located in close proximity to the recently granted planning permission for the Dexcom development.*
- *Footpath connectivity for these lands is supported in the recently granted planning permission for the Dexcom development.*
- *Lands are located in Proximity to Athenry Train Station and a number of community facilities.*

- *Sequentially these lands are located adjacent to an existing residential development.*
- *The Core Strategy of the GCDP 2022-2028 has identified a target population growth for Athenry of up to 1,350 people across the lifetime of the plan, aiming for a total population of 5,795. The Census 2022 results show that the population in Athenry is already at 5,765.*
- *Housing projections are based off obsolete statistics.*
- *The lands are the subject of live appeal with An Bord Pleanála for 72 no. residential units.*
- *The lands are serviced by the public sewer and the public water supply.*

The Office accepts the elected members' justification provided for retaining the proposed zonings as outlined in the 31AO(5) notice letter..

In respect of **MA 65**, the subject site is located on the north western periphery of the settlement outside of the CSO settlement boundary, and in an area that is predominantly agriculture land. The site is also designated as an Esker in Map 1A Land Use Zoning¹ and the site measures approximately 0.73 ha in size.

The elected members rejected the Chief Executive's recommendation to make the Local Area Plan without this alteration for the following reason:

As a result of the CE recommendations, I am proposing that the remainder of the lands at Folio GY53302 be zoned residential as it is effectively left landlocked and should be zoned in the interest of proper planning so that the entirety of the site can be taken into consideration in any future planning application.

The Office accepts the elected members' justification provided for retaining the proposed zonings as outlined in the 31AO(5) notice letter .

The Office however, remains of the view that **MA 46, 47, 48, 49, 50, 51, 59, and 60** are inconsistent with the core strategy of the County Development Plan, the

¹ Athenry Local Area Plan 2024 – 2030.

objectives of the County Development Plan and RSES for compact growth, and having regard to the policy and objective for a sequential approach to zoning in the Development Plans Guidelines.

An analysis of the adopted Local Area Plan demonstrates that, in addition to a number of opportunity sites and town centre /infill lands with the capacity to accommodate residential development, there is c.41 ha of land zoned Phase 1 Residential and c. 60 ha zoned Phase under the adopted Local Area Plan.

The extent of land zoned for residential development in the Local Area Plan as adopted therefore significantly exceeds the planning authority's estimate of the land requirement (21.8 ha²).

The adopted Local Area Plan is not therefore consistent with the core strategy and with Objective CS 1 and CS 3 of the County Development Plan, which state:

Objective CS 1 – To secure the implementation of the Core Strategy and the Settlement Hierarchy in so far as practicable, by directing sustainable growth towards the designated settlement.

Objective CS 3 – To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth and the development of economic, physical and social infrastructure.

In such circumstances, the Office does not consider that the elected members' reasons for the individual zoning objectives justifies making the Local Area Plan in a manner consistent with the core strategy of the County Development Plan and to implement objectives CSO 1 and CSO 3 of the County Development Plan.

Furthermore, the material alterations are located in peripheral locations contrary to compact growth and leapfrog other undeveloped lands, with significant infrastructure deficits. Moreover the SEA report identifies a number of these sites as having negative effects on the environment of Athenry.

² Table 1 of Athenry Local Area Plan 2024 – 2030

In reaching the above conclusions, the Office has assessed each of the Residential zoning material alterations in detail, as outlined below.

1.4.1 MA 47 and MA 48 – Lands at Farranablake East

MA 47 amends the zoning in the draft Local Area Plan from Outside Settlement Boundary to Residential Phase 1. The site measures approximately 1.6 ha and is located on the southern periphery of the town, outside the CSO settlement boundary, and beyond the outer relief road. **MA 48**, adjoins the site at MA 47, and amends the zoning in the draft Local Area Plan from Outside Settlement Boundary to Existing Residential. The site measures approximately 0.29 ha.

MA 5 referred to above, is located to the immediate west of the MA 47 and to the immediate south of the existing housing estate, Pairc Na hAbhain.

In relation to MA 47 and MA 48, the Chief Executive's response and recommendation stated '*revert to the provisions of the Draft Athenry LAP where these lands were not zoned*'.

The SEA raises concerns with these lands having regard to adverse environmental impacts in relation to the proposed zoning alterations. The SEA states the following in respect of MA 47 and MA 48.

these sites are located adjacent to each other and the LTP notes: The zoning of these additional lands to the south would require significant analysis and measures to be proposed at a project level to improve connectivity to these lands and crossing of the R348.

With regard to MA 47 and MA 48, the elected members rejected the Chief Executive's recommendation to make the Local Area Plan without these two amendments for the following reasons:

- *The OPR should be aware that these sites were included for almost 20 years and should indeed be included in the next iteration of the Athenry area plan.*
- *There is also an active planning application on this site.*

- *It would be important to stress to the OPR that this site is on WC22³ as per the Local Transport Plan.*
- *MA5, in the same area, was flagged by the OPR and supported by Forward Planning.*

The Office also notes that the elected members' rationale above is supported by a submission to Galway County Council on 3rd November 2023, as part of the consultation period for the Material Alterations to the draft Local Area Plan.

In relation to the zoning objectives in the previous Local Area Plan, MA 47 was zoned as R – Residential Phase 1, and MA 48 R – Residential. However, both that Local Area Plan (2012, and extended in 2017 for a further 5 years) and its parent County Development Plan (2009 and 2015) predated the publication of the National Planning Framework (2018) and RSES (2020), and as such were made within a significantly different planning policy framework. Section 19(6) of the Act provides that there is no presumption in law that any land zoned in a particular local area plan shall remain so zoned in any subsequent local area plan. The Office considers, that the zoning history is not, therefore, sufficient reason to justify the subject material alterations which are inconsistent with the objectives of the current Development Plan and RSES for the reasons set out below.

The Infrastructure Assessment also records that the lands are not serviced and as such the policy and objective, under the Development Plans Guidelines, not to de-zone serviced land therefore does not apply.

In respect of the active planning application on the site, the Office notes that a recent planning application (Planning Reference No. 23/60421) for 49 houses on the site MA 47 was refused planning permission by the local authority for five (5) reasons, including the first reason for refusal, which partially states the following:

³ WC22, as included for in Figure 6-1 of the LTP provides for emerging preferred walking and cycling measures along the R374.

The site is located in an area not zoned for development, on the outer periphery of Athenry town. It is the policy of Galway County Council to encourage the orderly and phased development of residential lands in accordance with the principles of the sequential approach as set out in the Sustainable Residential Development in Urban Areas (Cities Towns and Villages) Guidelines 2009. This shall include a positive presumption in favour of the sequential development of suitable serviced lands in zoned towns and villages. The development as proposed does not contribute to the compact growth of Athenry and is non-sequential in its siting at this location. It is considered that the proposed development would be contrary to Policy Objectives CS 2, CS3, CGR 1 and PM1 of the Galway County Development Plan 2022- 2028...

With regard to **MA 5**, the Office has set out its consideration of that material alteration above, and its reasons for accepting the decision of elected members.

Having regard to WC22 of the Local transport Plan (LTP), the Office acknowledges that this relates to a proposal to serve these lands with walking and cycling measures along the R374. However, these measures are not included in the Local Area Plan, and there is no information, timeframe or certainty regarding delivery within the lifetime of the plan. The Infrastructure Assessment identifies the requirement for a footpath extension to serve the lands at MA 47, which are accessed from a regional road located just over 1km from the town centre.

It is also evident from the Infrastructure Assessment that the lands have additional infrastructural constraints, in particular in relation to waste water treatment, as a connection extension to the public sewer is required to service these lands.

The inclusion of future active travel measures along the regional road alone is not therefore sufficient to justify the zoning of these lands in a peripheral location.

Material alterations MA 47 and MA 48 are both located outside the CSO settlement boundary, and would not therefore promote compact growth inconsistent with RPO 3.1 and 3.2, and the County Development Plan objectives CS2, CGR 1 and CS8 which state:

Objective CS 2 – To achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements, by

developing infill, brownfield and regeneration sites and prioritising underutilised land in preference to greenfield sites.

Objective CGR 1 – To require that all new development represents an efficient use of land and supports national policy objectives to achieve compact growth in towns and villages. Development of lands with no links to the town or village centre will be discouraged.

Objective CS 8 – To implement, through the plan and future local areas plans, policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions.

In addition, the lands leapfrog other more centrally located and undeveloped lands and do not constitute a sequential approach to development having regard to the policy and objective of the Development Plans Guidelines.

Further, the Office notes that the draft Local Area Plan provides sufficient land to meet anticipated development requirements in a sequential and coordinated manner. There is, therefore, no evidence-based rationale to support the requirement for the subject zoning objectives to ensure that adequate land is zoned to meet the population and housing supply targets set out in the core strategy.

Further, no adequate planning reasons have been provided to explain why the planning authority has decided not to implement RPO 3.1 and 3.2 of the RSES and/or Objectives CS 2, CGR 1, CC 8 and UL 1 of the County Development Plan, or to have regard to the policy and objective for a sequential approach to development in the Development Plans Guidelines.

1.4.2 MA 46 and 49 – Lands at Kingsland North

MA 49 amends the zoning in the draft Local Area Plan from Outside Settlement Boundary to Residential Phase 1. The site is located on the eastern periphery of the settlement, beyond the Part 8 approved Relief Road and outside the CSO settlement

boundary, in area otherwise un-zoned and currently predominately in agricultural use. The site measures approximately 6.3 ha.

MA 46 amends the zoning in the draft Local Area Plan from Outside Settlement Boundary to Residential Phase 1. The site, which measures approximately 6.9 ha, is located immediately east of MA 49, therefore beyond the Part 8 approved relief road and the CSO settlement boundary, and also in area predominately characterized by agriculture land.

In relation to MA 46 and MA 49, the Chief Executive's response and recommendation stated '*revert to the provisions of the Draft Athenry LAP where these lands were not zoned*'.

The SEA indicates that these sites are unsuitable and could lead to negative impacts on the environment. With regard to these sites the SEA report states:

These Proposed Material Alteration would zone more sensitive, less well serviced lands, further away from the established built envelope of the settlement (outside of the Draft Plan boundary) with associated unnecessary potentially significant adverse effects on a variety of environmental components...

In respect of MA 49 and MA 46, the elected members rejected the Chief Executive's recommendation to make the Local Area Plan without these two alterations for the following reasons:

- *Galway County Council extended the settlement boundary to return that part of the lands comprised in folio GY114562F to within the town boundary and zone them R1;*
- *Previously zoned R2 lands;*
- *They are strategically located 700m from the town centre;*
- *They are 750m from the railway station;*
- *They are 400m from the nearest school;*
- *The sewage pipe network is within 100m of the subject lands.*

- *WC20⁴ of the Local Transport Plan indicates walking and cycling infrastructure will be provided along this route.*

The reasons given by the elected members included an attached submission, specific to MA 46, which outlines the rationale for the elected members' reasons in respect of MA 46. The submission is summarised as follows:

- It is noted that these lands have been inside the town boundary and zoned Residential since the 2005 LAP. It is submitted that Section 4.4.1 of the Development Plans Guidelines requires that these lands are zoned residential and that the approach of the OPR in this case is a fundamental error.
- It is submitted that the motion of the elected member has been misrepresented as the motion sought to return lands to being within the town boundary and to zone them R1. Whereas, the Chief Executive's Report and the material alterations document present the proposal as rezoning of land from outside the settlement boundary to Residential phase 1. It is submitted that the recommendation of the OPR was arrived at through a misrepresentation of the motion.
- It is highlighted that the Infrastructure Assessment notes that the site as requiring "Significant Intervention" due to issues with sewer connections and footpaths. It is submitted that this is an error and misrepresentation of the correct position to mislead the OPR. Footpaths and safe routes to schools are to be delivered as per WC19 & WC20 and the site is therefore accessible. These routes are outlined in the LTP. These routes are also identified in the open consultation on the Athenry Town Public Realm Enhancement Project. Finally, it is noted that the upgrade of the sewer along the L3112 as far as the junction with the L7154 will allow for the upgraded

⁴ The LTP includes emerging preferred walking and cycling measures (Figure 6-1), including walking and cycling measures along the part 8 approved relief road.

sewer to serve the site as they will be within 50 metres of this new sewer.

This upgrade is noted by Uisce Éireann in their submission.

With regard to the location of the sites and the proximity of the train station, town centre and nearest school, the Office notes the extent of the zoning (13.2 ha) is significant, and the distances submitted by the elected members would vary having regard to the exact location on the extensive area of the lands(s). Further the Office notes that material alterations MA46 and MA49 are both located outside the CSO settlement boundary, and would therefore not promote compact growth inconsistent with RPO 3.1 and 3.2, and the County Development Plan objectives CS2, CGR 1 and CS8.

Moreover, the lands leapfrog other more centrally located lands and do not constitute a sequential approach to development having regard to the policy and objective of the Development Plans Guidelines.

In relation to the servicing of the lands, the Infrastructure Assessment identifies 'significant intervention required' in respect of a connection extension to the sewer and footpath connections or lighting for both sites. The elected members acknowledge that an upgrade of the sewer along the L3112 is required to bring the site within 50 metres of this new sewer. This constitutes significant upgrade works and there is no information, timeframe or certainty regarding delivery within the lifetime of the plan. Similarly, the walking and cycling measures will be provided as part of the relief road and are, therefore, dependent on the delivery of this infrastructure to connect the lands to the town.

Notwithstanding the matters relating to infrastructure constraints, these lands are peripherally located beyond the Part 8 approved relief road and the CSO settlement boundary, and there are preferably located lands which are zoned and serviced to meet demand.

Further, the Office notes that the draft Local Area Plan provides sufficient land to meet anticipated development requirements in a sequential and coordinated manner. There is, therefore, no evidence-based rationale to support the requirement for the subject zoning objectives to ensure that adequate land is zoned to meet the population and housing supply targets set out in the core strategy.

In relation to the reason that the lands were previously located within the settlement boundary and zoned Residential R2 in the previous Local Area Plan, the response set out above (section 1.4.1) in respect of MA 47 and 48 also applies. As a point of clarification, the Office accepts that the lands were within the settlement boundary of the previous plan, however the lands lie outside the CSO boundary for Athenry and are outside the built-up area of the town.

Furthermore, the lands were zoned R2, not R1, in the previous plan, and the Infrastructure Assessment also records that the lands are not serviced. As such the policy and objective, under the Development Plans Guidelines, not to de-zone serviced land therefore does not apply.

No adequate planning reasons have been provided to explain why the planning authority has decided not to implement RPO 3.1 and 3.2 of the RSES and/or Objectives CS 2, CGR 1, CC 8 and UL 1 of the County Development Plan, or to have regard to the policy and objective for a sequential approach to development in the Development Plans Guidelines.

1.4.3 MA 50 and 51 – Lands at Gorteenacra

MA 50 amends the zoning in the draft Local Area Plan from Open Space/Recreational & Amenity to Residential Phase 2, and **MA 51** amends the zoning in the draft Local Area Plan from Outside the Settlement Boundary to Residential Phase 2. Both MA 50 and MA 51 effectively form a single site and combined these sites measure approximately 10.2 ha in size. The lands are located on the eastern periphery of the town, outside the CSO settlement boundary. MA 51 is located outside the Part 8 approved relief road, whereas MA 50 (the smaller site of the two sites) is located on the town side of the Part 8 approved relief road.

In relation to MA 50 and MA 51, the Chief Executive's response and recommendation stated '*revert to the provisions of the Draft Athenry LAP*'.

In the case of material alteration MA51, the SEA has also specifically outlined that:

These Proposed Material Alteration would zone more sensitive, less well serviced lands, further away from the established built envelope of the

settlement (outside of the Draft Plan boundary) with associated unnecessary potentially significant adverse effects on a variety of environmental components....

The elected members rejected the Chief Executive's recommendation to make the Local Area Plan without these two alterations for the following reasons:

- *This land has historically been zoned R2.*
- *The landholders are waiting for R1 to have an opportunity to make a planning application on the lands.*
- *This is one of the most strategically located parcels of land within walking distance of the town centre that would serve as a great reserve of land for R2 should the rest of the towns R1 lands be developed during the lifetime of the plan.*
- *The provision of R2 lands facilitates good future proofing of the Athenry Local area plan and ensuring there is adequate residential zoned land for the future of the town, with proximity to the newly completed sewer network of Athenry.*

In relation to zoning history of the lands and the point that the owner of the lands was waiting to submit a planning application, the Office notes that the site of MA 50 was not zoned for housing under the previous Local Area Plan, but was zoned Agriculture. MA 51 was partially zoned in the previous Local Area Plan as R – Residential Phase 2. The response set out above (section 1.4.1) in respect of MA 47 and 48 also applies in this case.

Furthermore, neither parcel of land are identified as serviced in the Infrastructure Assessment. The policy and objective, under the Development Plans Guidelines, not to de-zone serviced zoned housing land therefore does not apply.

With regard to the point in relation to the proximity to the public sewer the Office notes from the Infrastructure Assessment that the lands have infrastructural constraints, requiring 'significant intervention'. In this regard it is noted that the sites are currently not serviced by public sewer.

Regarding the proximity of the land to the town, the Infrastructure Assessment states that a footpath extension and public lighting is also required to service these lands.

The lands are both located outside the CSO settlement boundary and would not therefore promote compact growth, and would be inconsistent with RPO 3.1 and 3.2, and the Development Plan objectives CS2, CGR 1 and CS8.

Moreover, the lands leapfrog other more centrally located lands and do not constitute a sequential approach to development having regard to the policy and objective of the Development Plans Guidelines.

No or no adequate reasons relating to the proper planning and sustainable development of the area have been provided to explain why the planning authority has decided not to implement RPO 3.1 and 3.2 of the RSES and/or Objectives CS 2, CGR 1, CC 8 and UL 1 of the County Development Plan, or to have regard to the policy and objective for a sequential approach to development in the Development Plans Guidelines.

Furthermore, the Office notes that the draft Local Area Plan provides sufficient land to meet anticipated development requirements in a sequential and coordinated manner. There is, therefore, no evidence-based rationale to support the requirement for the subject zoning objective to ensure that adequate land is zoned to meet the population and housing supply targets set out in the core strategy.

1.4.4 MA 59 and 60 – Lands at Gorteenacra

MA 59 amends the zoning in the draft Local Area Plan from Open Space/Recreational & Amenity to Residential Phase 2, and **MA 60** amends the zoning in the draft Local Area Plan from Agriculture to Residential Phase 2. The lands pertaining to these material alterations are located on the eastern periphery of the settlement, outside of the CSO settlement boundary. The total area of the combined sites measures approximately 2.9 ha.

In relation to MA 59 and MA 60, the Chief Executive's response and recommendation stated '*revert to the provisions of the Draft Athenry LAP*', in which

case MA 59 was previously zoned Open Space/Recreation and Amenity and MA 60 was zoned Agriculture in the draft Local Area Plan.

The elected members rejected the Chief Executive's recommendation to make the Local Area Plan without these two alterations for the following reasons:

- *In 2007, planning granted for 65 houses with treatment plant.*
- *In 2016, the site owner engaged with the local authority in pre-planning consultation. The site owner was advised to resubmit plans, and that the treatment plans no longer allowed, as a new town public sewer would be completed in 2/3 years.*
- *In 2018 – the local authority (and RPS consultants) engaged with the site owner to discuss public sewer being located through owner's lands to reduce length of sewer and prevent large detour.*
- *In 2020, site owner agreed for way leave through their site at a hugely reduced rate, due to RPS advising Irish water auctioneer that land was less valuable without planning/sewer.*
- *In 2023 – public sewer completed.*
- *The site now has access to sewer on site, and water on the road.*
- *The site is close to the town centre.*
- *Footpath to the school is high priority for locals and is under consideration so site will have connectivity.*

Notwithstanding a previous grant of planning permission on the lands in 2007, the Office notes the zoning of the site was R – Residential Phase 2 in the previous Local Area Plan. Further the policy objective in the Local Area Plan relating to phasing of residential development facilitates the development of R – Residential Phase 2 land in certain circumstances. Policy ASP 5 Residential Development Phasing of the Athenry Local Area Plan, clarifies, as follows;

- *Residential developments on Residential (Phase 2) lands will be subject to compliance with the Core Strategy, the principles of proper planning and sustainable development, connectivity, including infrastructure and public*

footpath and lighting to the town centre, the sequential approach, avoidance of leap-frog developments, and subject to meeting normal planning, environmental, access and servicing requirements. The development will only be permitted where a substantiated evidence-based case has been made to the satisfaction of the Planning Authority and the development will not prejudice the future use of the lands for the longer-term growth needs of each settlement.

Further, the Office notes that the draft Local Plan provides sufficient land to meet anticipated development requirements in a sequential and coordinated manner. There is, therefore, no evidence-based rationale to support the requirement for the subject zoning objective to ensure that adequate land is zoned to meet the population and housing supply targets set out in the core strategy.

In relation to infrastructure capacity, the Office accepts that the lands are serviced by public water and waste water provision. However, the lands are served by a footpath and the Infrastructure Assessment identifies 'constraints present regarding road connectivity and footpath'.

Notwithstanding the infrastructure capacity, material alterations MA 59 and MA 60 are both located in an isolated location outside the CSO settlement boundary, and would not therefore and would not therefore promote compact growth inconsistent with RPO 3.1 and 3.2, and the Development Plan objectives CS2, CGR 1 and CS8.

Moreover, the lands leapfrog extensive areas of other more centrally located and undeveloped lands and do not constitute a sequential approach to development having regard to the policy and objective of the Development Plans Guidelines.

No or no adequate reasons relating to the proper planning and sustainable development of the area have been provided to explain why the planning authority has decided not to implement RPO 3.1 and 3.2 of the RSES and/or Objectives CS 2, CGR 1, CC 8 and UL 1 of the County Development Plan, or to have regard to the policy and objective for a sequential approach to development in the Development Plans Guidelines.

2. Opinion of the Office and Reasons

Having considered the Local Area Plan as adopted, under section 31AO(6) of the Act, the Office is of the opinion that the said Local Area Plan has not been made in a manner consistent with the recommendations of the Office.

Further, the Office does not accept that the reasons given for not implementing the Office's recommendations in the 31AO(5) notice letter received by the Office on the 15th January 2024 adequately justifies the failure to implement those recommendations or explain how, notwithstanding that failure, the Local Area Plan as made is consistent with the objectives of the County Development Plan.

As you will be aware, the Office has various functions in respect of evaluating and assessing local area plans, summarised as follows:

- under section 31AO(1) of the Act, the Office has a statutory duty to evaluate and assess at least at a strategic level planning authority proposals to make, amend or revoke local area plans;
- under section 31AO(2) the Office shall endeavour to ensure that where appropriate it addresses the legislative and policy matters set out at (a) to (e) therein;
- under section 31AO(3)(a), in making observations or submissions in respect of any local area plan evaluation or assessment, the Office shall make, to the relevant planning authority, such recommendations in relation to the Office's evaluation and assessments as it considers necessary to ensure effective co-ordination of national, regional and local planning requirements by the relevant planning authority in the discharge of its development planning functions;
- under section 31AO(6), the Office shall consider whether or not the local area plan as made, amended or revoked by the planning authority is, in the opinion of the Office, consistent with any recommendations made by the Office;
- in performing its functions, the Office must, under section 31P(3) of the Act, take account of the objective for contributing to proper planning and sustainable development and the optimal functioning of planning under the Act; and
- under section 31S, the Office must, in performing its functions, have regard to:

- a) the policies and objectives for the time being of the Government, a State authority (including Ministerial guidelines, policy directives and directions issued under *Chapter IV of Part II*), planning authorities and any other body which is a public authority whose functions have, or may have, a bearing on the proper planning and sustainable development of cities, towns, villages or other areas, whether urban or rural;
- b) the public interest and any effect the performance of the Office's functions may have on issues of strategic, economic or social importance to the State;
- c) the National Planning Framework (or, where appropriate, the National Spatial Strategy) and any regional spatial and economic strategy for the time being in force; and
- d) the requirements of relevant acts of the European Union, in particular, those relating to —
 - (i) the Environmental Impact Assessment Directive,
 - (ii) Directive 2001/42/EC of the European Parliament and Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment,
 - (iii) the Habitats Directive, and
 - (iv) the Birds Directives,

in so far as those requirements relate to planning authorities by virtue of being designated competent authorities for the purposes of those acts.

Accordingly, having considered the Local Area Plan in light of the above statutory functions and the notice from the planning authority received on the 15th January 2023 issued under section 31AO(5), the Office is of the opinion that the Local Area Plan has not been made in a manner consistent with the recommendations of the Office. In particular:

- I. the adopted Local Area Plan includes material alterations to the draft Local Area Plan, which zone additional residential land in excess of what is required for the town having regard to the growth targets for Athenry under the core

strategy of the County Development Plan. These material alterations are inconsistent with Objective CS 1 to secure the implementation of the population growth and housing supply targets set out in the core strategy and settlement hierarchy, and Objective CS 3 to support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth and the development of economic, physical and social infrastructure.

These material alterations are located in peripheral locations outside the CSO boundary which leapfrog extensive areas of other more centrally located and undeveloped lands, and have inadequate infrastructure including a lack of footpath connection to the town and, in the case of MA 46, 47, 49, 50 and 51, do not have public sewer connections. The material alterations would therefore individually and cumulatively encourage a pattern of development in particular locations which is inconsistent with RPO 3.1 and RPO 3.2 of the RSES for compact growth and the objectives of the County Development Plan to achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements (Objective CS2), discourage the development of lands with no links to the town or village centre (Objective CGR 1), encourage sustainable compact growth and settlement patterns to secure climate resilience and reduce carbon dioxide and greenhouse emission (Objective CS 8), and fail to have regard to the policy and objective for a sequential approach to development in the Development Plans Guidelines issued under section 28 of the Act regarding the sequential approach.

Moreover, having considered the reasons given by the elected members as set out above, the Office remains of the view that provisions of the Local Area Plan as made are inconsistent with the County Development Plan, specifically the core strategy and with objectives CS 1, CS 2, CS 3, CGR 1, and CS 8, and with RPO 3.1 and 3.2 of the RSES.

No or no adequate reasons relating to the proper planning and sustainable development of the area have been provided to explain why the planning authority has failed to implement the objectives of the County Development Plan and the RSES.

In making the Local Area Plan with the material alterations, the planning authority has made the Local Area Plan contrary to the requirements of section 19(2) of the Act which requires local area plans be consistent with the objectives of the county development plan, its core strategy and any regional spatial and economic strategy that applies to the area of the plan.

The factors that the Office has taken into account in forming this opinion are as follows:

- (i) The objectives and policies of the County Development Plan, CS 1, CS 2, CS 3, CGR 1 and CS 8 which state:

Objective CS 1

To secure the implementation of the Core Strategy and the Settlement Hierarchy in so far as practicable, by directing sustainable growth towards the designated settlement.

Objective CS 2

To achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements, by developing infill, brownfield and regeneration sites and prioritising underutilised land in preference to greenfield sites.

Objective CS 3

To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth and the development of economic, physical and social infrastructure.

Objective CGR 1

To require that all new development represents an efficient use of land and supports national policy objectives to achieve compact growth in towns and villages. Development of lands with no links to the town or village centre will be discouraged.

Objective CS 8

To implement, through the plan and future local areas plans, policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions.

- (ii) Regional Policy Objectives RPO 3.1 and RPO 3.2 which state:

RPO 3.1

Develop urban places of regional-scale through:

- *Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth;*
- *Delivering significant compact growth in Key Towns; and*
- *Developing derelict and underutilised sites, with an initial focus within town cores.*

RPO 3.2

- (a) *Deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs.*
- (b) *Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint.*
- (c) *Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints.*

- (iii) Development Plans Guidelines, which state:

Section 6.2.3 - Sequential Approach to Zoning for Residential Development

In undertaking the zoning function for new residential development at individual settlement scale, planning authorities are required to adopt a sequential

approach which reflects the compact growth, utilisation of existing infrastructure and town regeneration national policy objectives of the NPF, further developing the Tiered Approach.

It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.

- (xi) The CE's Reports on the draft Plan and the material alteration stages and the section 31AO(5) notice letter;
- (xii) Matters generally within the scope of section 19 of the Act;
- (xiii) The Office's statutory obligations under the Act; and
- (xiv) In so far as practicable, the matters listed at section 15(1)(a) - (e) of the Climate Action and Low Carbon Development Act 2015 (as amended by the Climate Action and Low Carbon Development Act 2021).

In light of the above, the Office is, therefore, of the opinion that the Local Area Plan has not been made in a manner consistent with its recommendations as set out in the submissions dated 7th July 2023 and 3rd November 2023, and that the decision of the Council results in the making of a Local Area Plan in a manner that is inconsistent with the County Development Plan of the area concerned, and as a consequence the use by the Minister of his or her functions to issue a direction under section 31 would be merited.

3. Recommendation to the Minister

Having regard to section 31AO(7) of the Act, the Office recommends the exercise of your function under the relevant provisions of section 31 of the Act taking such steps as to rectify the matter in a manner that, in the opinion of the Office, will ensure that the local area plan sets out an overall strategy for proper planning and sustainable development as set out in the draft direction to the planning authority accompanying this notice letter, i.e.:

(i) reinstate the following zoning objectives and associated text consistent with the recommendation of the CE's Report on the material alterations, and delete the following material alterations from the adopted Local Area Plan:

- Material alterations MA 46, MA 47 and MA 49 – i.e. the subject lands revert to Outside the Settlement Boundary from Residential Phase 1 as per the draft Local Area Plan;
- Material alteration MA 51 – i.e. the subject lands revert to Outside the Settlement Boundary from Residential Phase 2 as per the draft Local Area Plan;
- Material alteration MA 60 - the subject lands revert to Agriculture from Residential Phase 2 as per the draft Local Area Plan;
- Material alterations MA 50 and MA 59 – the subject lands revert to Open Space/Recreation & Amenity from Residential Phase 2; and
- Material alteration MA 48 – the subject lands revert to Outside the Settlement Boundary from Existing Residential as per the draft Local Area Plan.

Please do not hesitate to contact the Office should you have any queries in relation to the above. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,



Niall Cussen

Planning Regulator

DRAFT DIRECTION IN THE MATTER OF SECTION 31
OF THE PLANNING AND DEVELOPMENT ACT 2000 (as amended)
Athenry Local Area Plan 2024-2030

“Local Area Plan” means the Athenry Local Area Plan 2024-2030.

“Planning Authority” means Galway County Council.

The Minister of State at the Department of Housing, Local Government and Heritage in exercise of the powers conferred on him by section 31 of the Planning and Development Act 2000 (No.30 of 2000) (as amended) ("the Act") and the Housing, Local Government and Heritage (Delegation of Ministerial Functions) Order 2023 (S.I. No. 116 of 2023), and consequent to a recommendation made to him by the Office of the Planning Regulator, hereby directs as follows:

This Direction may be cited as the Planning and Development (Athenry Local Area Plan 2024-2030) Direction 2024.

The Planning Authority is hereby directed to take the following steps with regard to the Development Plan:

- (i) reinstate the following zoning objectives and associated text consistent with the recommendation of the Chief Executive’s Report on the material alterations, and delete the following material alterations from the adopted Local Area Plan:
- Material alterations MA 46, MA 47 and MA 49 – i.e. the subject lands revert to Outside the Settlement Boundary from Residential Phase 1 as per the draft Local Area Plan;
 - Material alteration MA 51 – i.e. the subject lands revert to Outside the Settlement Boundary from Residential Phase 2 as per the draft Local Area Plan;
 - Material alteration MA 60 - the subject lands revert to Agriculture from Residential Phase 2 as per the draft Local Area Plan;
 - Material alterations MA 50 and MA 59 – the subject lands revert to Open Space/Recreation & Amenity from Residential Phase 2,

- Material alteration MA 48 – the subject lands revert to Outside the Settlement Boundary from Existing Residential as per the draft Local Area Plan.

STATEMENT OF REASONS

- I. The Local Area Plan as adopted includes material alterations to the draft Local Area Plan, which zone additional residential land in excess of what is required for the town having regard to the growth targets for Athenry under the core strategy of the Galway County Development Plan 2022-2028 (the 'County Development Plan'). These material alterations are inconsistent with Objective CS 1 to secure the implementation of the population growth and housing supply targets set out in the core strategy and the settlement hierarchy, and Objective CS 3 to support and manage self-sufficient sustainable development of all settlements in a planned manner, with population growth and the development of economic, physical and social infrastructure.

These material alterations are located in peripheral locations outside the CSO boundary which leapfrog extensive areas of other more centrally located and undeveloped lands, and have inadequate infrastructure including a lack of footpath connection to the town and, in the case of MA 46, 47, 49, 50 and 51, do not have public sewer connections. The material alterations would therefore individually and cumulatively encourage a pattern of development in particular locations which is inconsistent with RPO 3.1 and RPO 3.2 of the RSES for compact growth and the objectives of the County Development Plan to achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements (Objective CS2), discourage the development of lands with no links to the town or village centre (Objective CGR 1), encourage sustainable compact growth and settlement patterns to secure climate resilience and reduce carbon dioxide and greenhouse emission (Objective CS 8), and fail to have regard to the policy and objective for a sequential approach to development in the Development Plans Guidelines issued under section 28 of the Act regarding the sequential approach.

- II. The Local Area Plan has not been made in a manner consistent with, and has failed to implement, the recommendations of the Office of the Planning Regulator under section 31 AO of the Act.
- III. In light of the matters set out at I above, the Minister is of the opinion that the Local Area Plan as made is inconsistent with the objectives of the Development Plan of the area, which is a requirement of the Act.
- IV. In light of the matters set out at I, II III, above, the Local Area Plan is not in compliance with the requirements of the Act.

GIVEN under my hand,

Minister for Housing, Local Government and Heritage

day of Month, year.



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

Appendix 1: Mapping of Sites Identified in Draft Direction

Aerial view of 8 sites in context



Sites presented in order of draft direction:

Part (i) - MA46, MA47 & MA49.

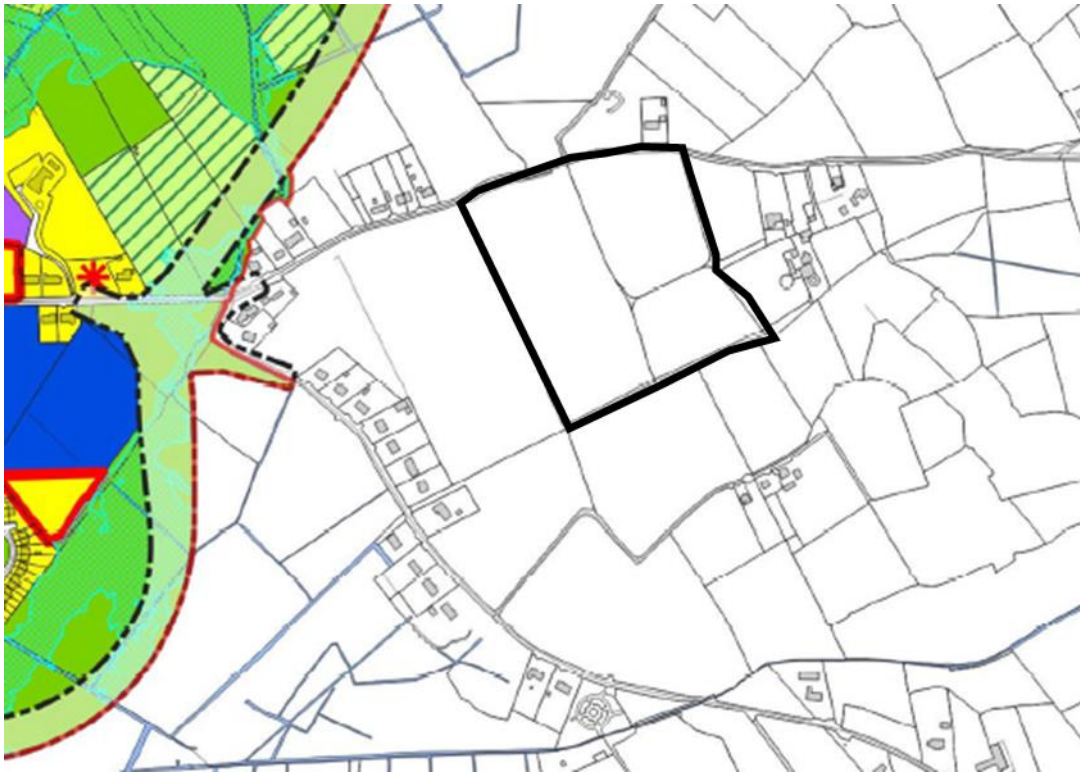
MA51

MA60

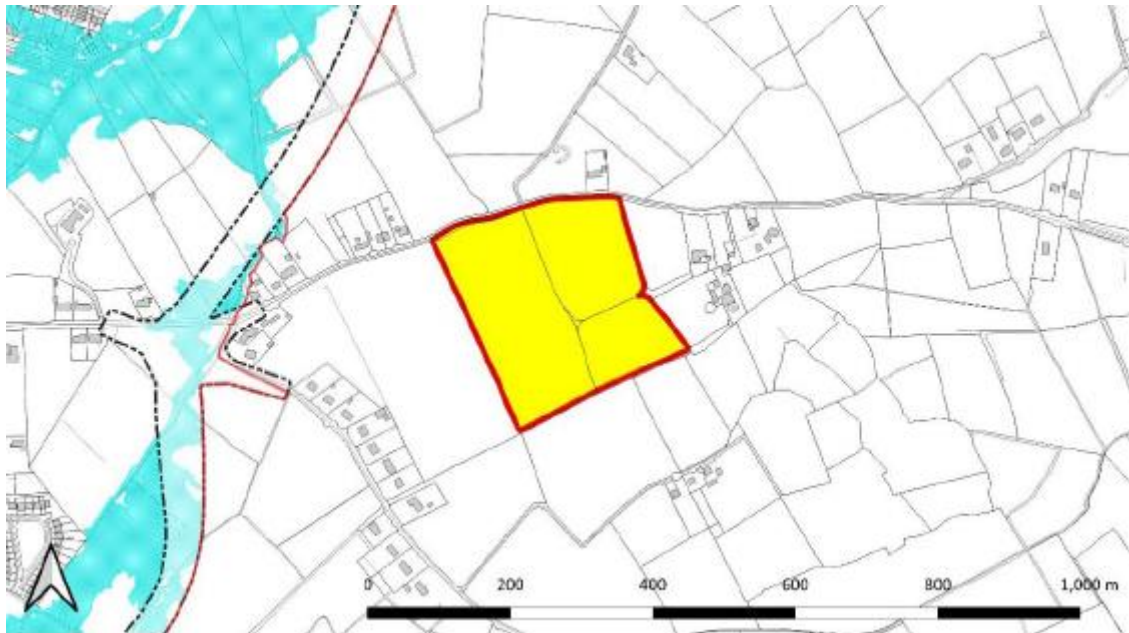
MA50 & MA59

MA48

Material Amendment MA46 (part (i) of DD)



**Draft LAP zoning = Outside the Settlement
Boundary (outlined black)**



**Proposed material alteration zoning – Residential
Phase 1 (outlined red)**

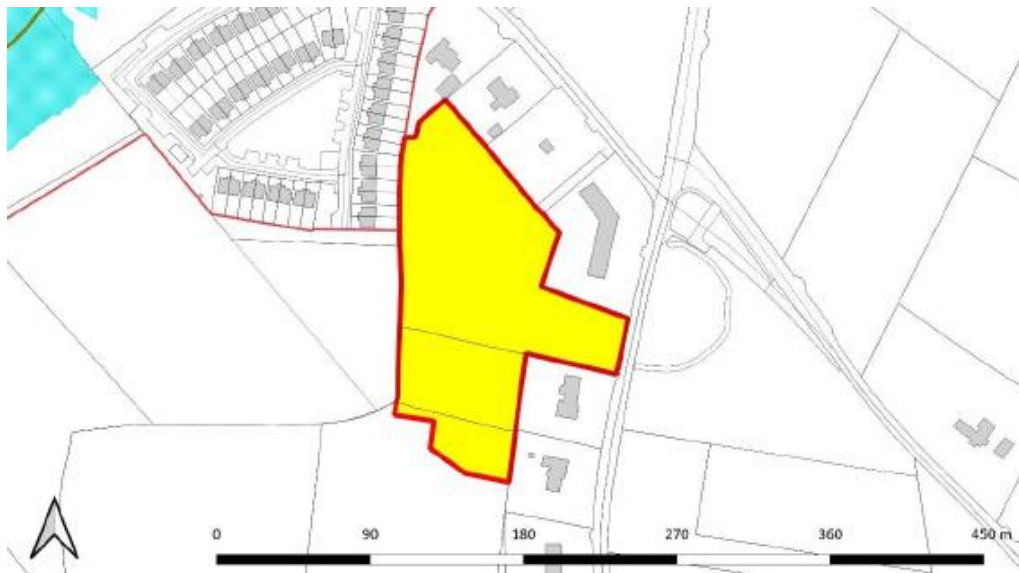


Aerial view MA46

Material Amendment MA47 (part (i) of DD)



**Draft LAP zoning = Outside the Settlement
Boundary (outlined black)**



**Proposed material alteration zoning – Residential
Phase 1 (outlined red)**

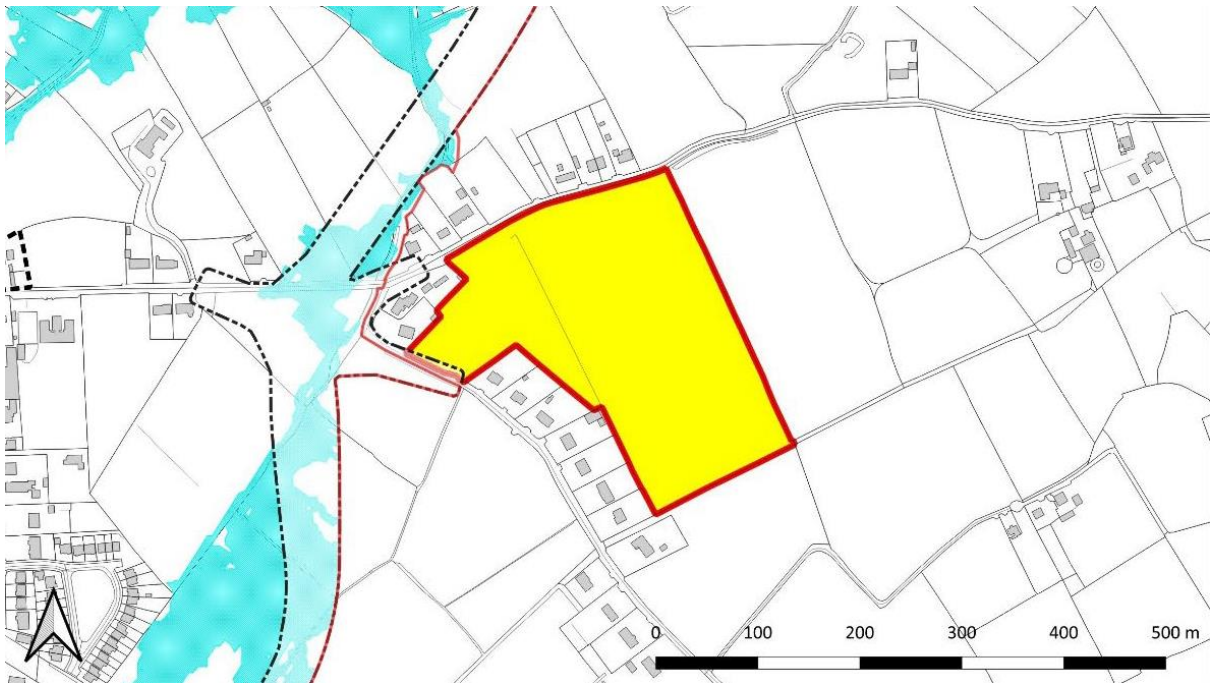


Aerial view MA47

Material Amendment MA49 (part (i) of DD)



**Draft LAP zoning = Outside the Settlement
Boundary (outlined black)**



**Proposed material alteration zoning – Residential
Phase 1 (outlined red)**

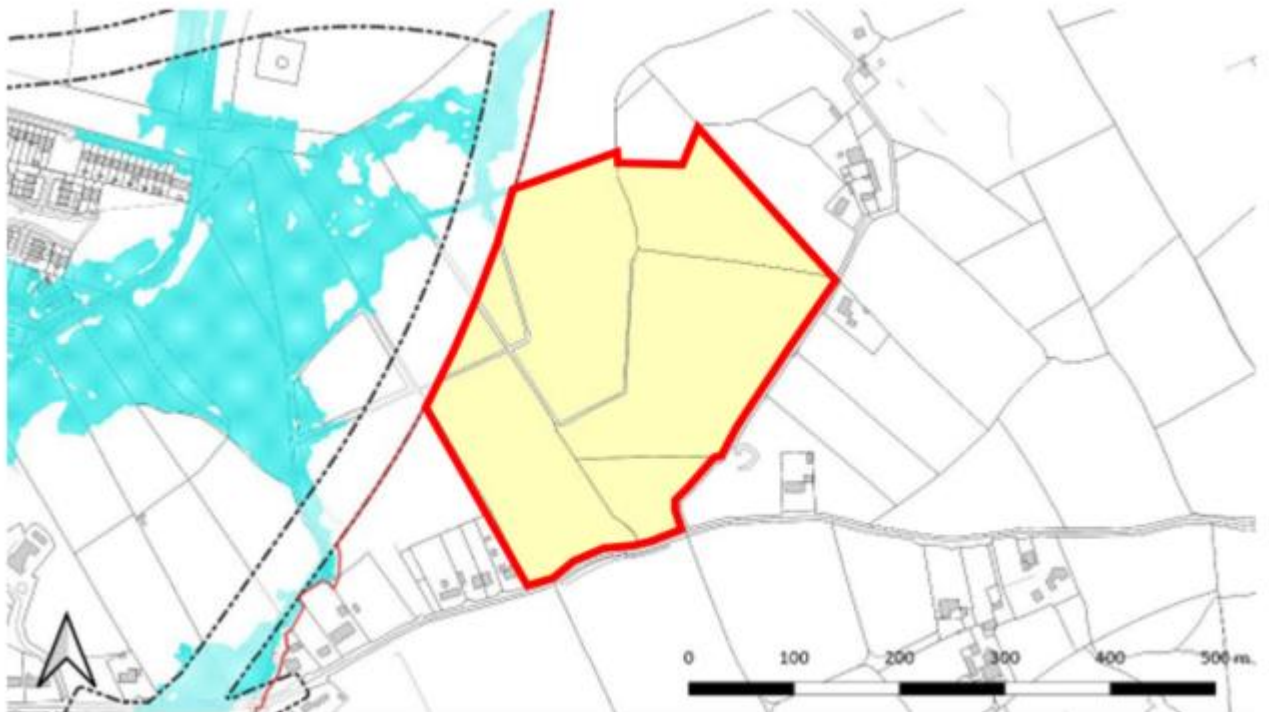


Aerial view MA49

Material Amendment MA51 (part (i) of DD)



**Draft LAP zoning = Outside the Settlement
Boundary (outlined black)**



**Proposed material alteration zoning – Residential
Phase 2 (outlined red)**



Aerial view MA51

Material Amendment MA60 (part (i) of DD)



Draft LAP zoning = Agriculture (outlined black)



**Proposed material alteration zoning –
Residential Phase 2 (outlined red)**

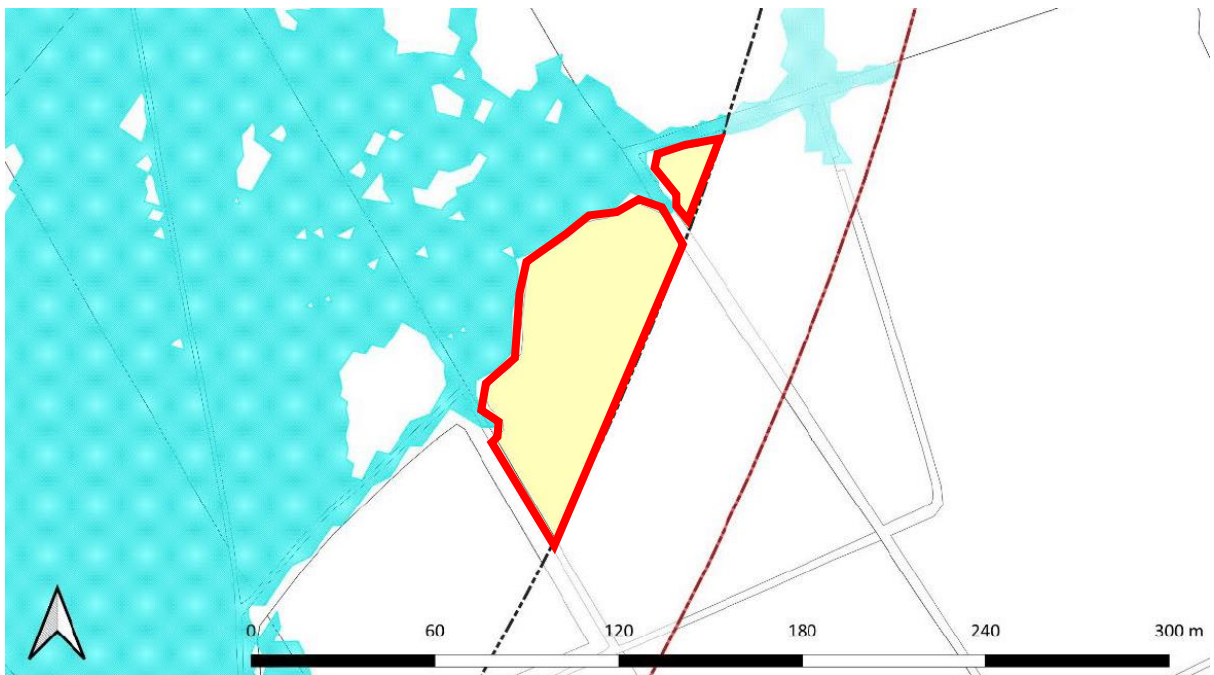


Aerial view MA60

Material Amendment MA50 (part (i) of DD)



**Draft LAP zoning = Open Space/Recreation &
Amenity (outlined black)**



**Proposed material alteration zoning –
Residential Phase 2 (outlined red)**

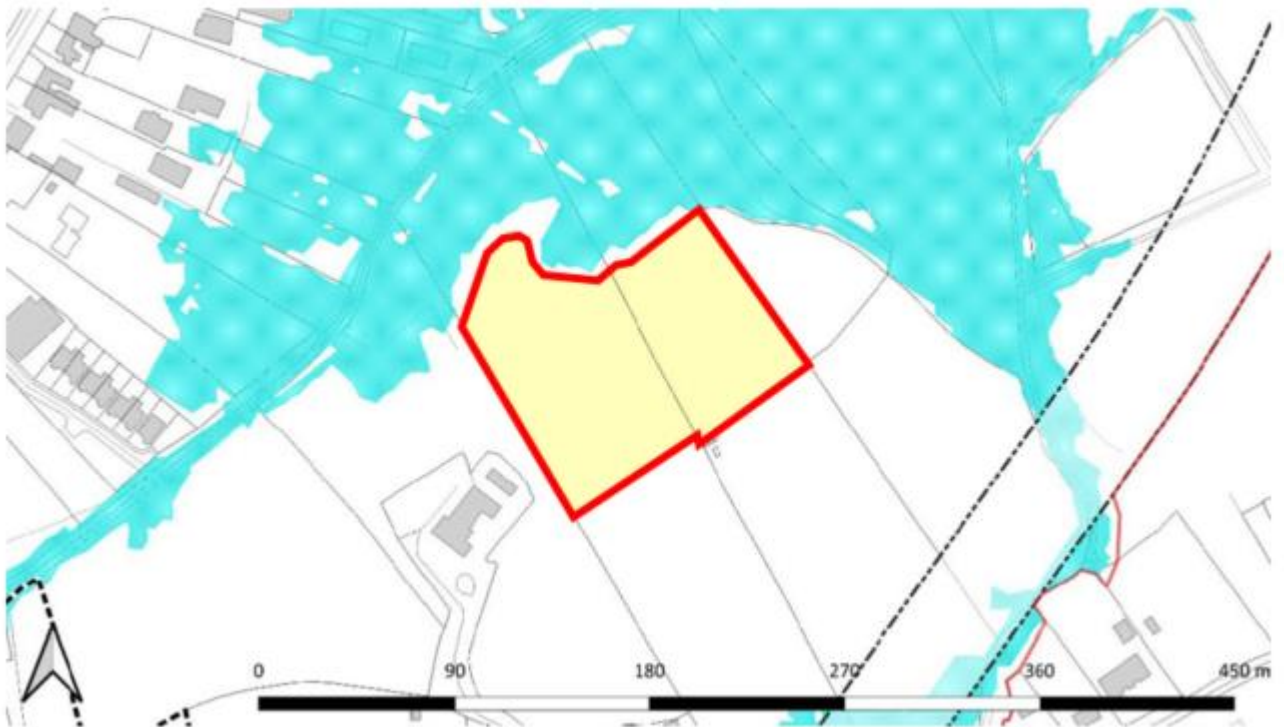


Aerial view MA50

Material Amendment MA59 (part (i) of DD)



**Draft LAP zoning = Open Space/Recreation &
Amenity (outlined black)**



**Proposed material alteration zoning –
Residential Phase 2 (Outlined Red)**



Aerial view MA59

Material Amendment MA48 (part (i) of DD)



**Draft LAP zoning = Outside the Settlement
Boundary (outlined black)**



**Proposed material alteration zoning –
Residential Existing (Outlined Red)**



Aerial view MA48