



Comhairle Cathrach Chorcaí Cork City Council

Halla na Cathrach, Corcaigh - City Hall, Cork - T12 T997

Hawks Asset Management

~~22 Northumberland Road~~

~~Ballsbridge~~

~~Dublin 4~~

~~D04ED7S~~

15th July 2021

RE: R674/21 – Section 5 Declaration
Property: Retail Unit B, Phase 2, Kinsale Retail Park

Dear Sir/Madam,

With reference to your request for a section 5 Declaration at the above named property, I wish to advise and having regard to —

- Sections 2 and 3 of the Planning and Development Act 2000 (as amended), and
- Articles 9 of the Planning and Development Regulations 2001 (as amended),

It is considered that the use of the structure, granted under TP16/36977 as a Retail Warehouse, as a retail warehouse selling mixed variety bulky household goods is **NOT** development. The onus is on the developer to comply with the relevant conditions attached to the existing permission.

Yours faithfully,

Kerry Bergin
Assistant Staff Officer
Community, Culture and Placemaking
Cork City Council



We are Cork.

PLANNER'S REPORT Ref. R R674/21		Cork City Council Development Management Strategic Planning and Economic Development
Application type	Section 5 Declaration	
Description	<i>Whether the use of the structure as a retail warehouse selling mixed variety bulky household goods constitutes development? And if so, is it exempt development.</i>	
Location	Retail Unit B, Phase 2, Kinsale Retail Park.	
Applicant	Hawk Asset Management	
Date	14/07/2021	
Recommendation	<i>Is NOT Development</i>	

In this report 'the Act' means the Planning and Development Act 2000 (as amended) and 'the Regulations' means the Planning and Development Regulations 2001 (as amended), unless otherwise indicated.

1. Requirements for a Section 5 Declaration

Section 5(1) of the Planning and Development Act 2000 as amended states,

5.—(1) If any question arises as to what, in any particular case, is or is not development or is or is not exempted development within the meaning of this Act, any person may, on payment of the prescribed fee, request in writing from the relevant planning authority a declaration on that question, and that person shall provide to the planning authority any information necessary to enable the authority to make its decision on the matter.

The requirements for making a section 5 declaration are set out in the Act.

2. The Question before the Planning Authority

In framing the question to the planning authority, the applicant states in Q2 of the application form:

Whether the use of the structure as a retail warehouse selling mixed variety bulky household goods constitutes development? If it does constitute development, is it exempt?

3. Site Description

The property in question is an existing retail warehouse (an end unit along the western boundary) located in the Kinsale Retail Park.

4. Planning History

One planning application is referred to which is attached to this site:

This is summarised as follows:

CCC# Ref	Development Granted	CCC# Conditions
16/36977	Permission granted for a Retail Warehouse Unit (974sq.m)	2. (a) The retail warehouse unit hereby permitted shall be used for the sale of bulky goods as defined in the Retail Planning Guidelines 2012 only and shall not be used for mainstream comparison or convenience retail use. The retail floorspace devoted to ancillary products shall not exceed 20% of the total net retail floorspace of the hereby permitted retail warehouse unit. (b) The retail warehouse unit hereby permitted shall not be used for the bulk sale of building materials such as sand, gravel or concrete blocks. (c) The amount of floor-space within the retail warehouse unit shall not be increased by the expansion of the mezzanine floor

		<p>hereby permitted without a grant of planning permission from the planning authority or An Bord Pleanála.</p> <p>(d) No change of use of the retail warehouse unit hereby permitted shall be permitted without a grant of planning permission from the planning authority or An Bord Pleanála.</p> <p>(e) The retail warehouse unit hereby permitted shall not be subdivided or amalgamated with any other unit(s) without a grant of planning permission from the planning authority or An Bord Pleanála.</p> <p>Reason: To define the scope of the permission and to ensure that the type of use conforms to the requirements of the City Development Plan 2015, including paragraph 4.40 and Objective 4.13, and the Retail Planning Guidelines 2012.</p>
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Cork City Council Planning

5. Legislative Provisions

5.1 The Act

Section 2(1),

“works” includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.

Section 3(1),

In this Act, “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or ‘the making of any material change in the use of any structures or other land’

Section 4(1)(h),

The following shall be exempted developments for the purposes of this Act-development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;

Section 4(2),

Section 4(2) provides that the Minister may, by regulations, provide for any class of development to be exempted development. The principal regulations made under this provision are the Planning and Development Regulations 2001-2013.

Section 5(1),

(See section 1 of this report)

Section 177U (9) (screening for appropriate assessment)

In deciding upon a declaration or a referral under section 5 of this Act a planning authority or the Board, as the case may be, shall where appropriate, conduct a screening for appropriate assessment in accordance with the provisions of this section.

5.2 The Regulations

Article 9 (1)

Development to which article 6 relates shall not be exempted development for the purposes of the Act –

- (a) (i) if the carrying out of such development would... contravene a condition attached to a permission under the Act or be inconsistent with any use specified in a permission under the Act,
- (a) (viii) consist of or comprise the extension, alteration, repair or renewal of an unauthorised structure or a structure the use of which is an unauthorised use,

Article 10 (1)

Development which consists of a change of use within any one of the classes of use as specified in Part 4 of Schedule 2, shall be exempted development for the purposes of the Act, provided that the development, if carried out would not –

- (c) be inconsistent with any use specified or included in such a permission, or
- (d) be development where the existing use is an unauthorised, save where the change of use consists of resumption of a use which is not unauthorised and which has not been abandoned

6. ASSESSMENT

6.1 Development

The first issue for consideration is whether or not the matter at hand is ‘development’.

‘Development’ as defined in the Act (3)(1) comprises two possible chief components: ‘the carrying out of any works on, in, over or under land’, or ‘**the making of any material change in the use of any structures or other land**’. In order to ascertain whether or not the subject use is considered to be development as so defined, consideration must first be given to whether any works on, in, over or under land have or will be carried out, and secondly to whether any material change in the use of any structures or other land have or will take place.

6.2 Works

‘Works’ is defined in section 2(1) of the Act as ‘the carrying out of any works on, in, over, or under land’ including ‘any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal, and in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.’

The proposed use is as stated as follows:

“It is hoped that the unit once acquired, can be used for the sale of a mix of variety bulky goods including furniture and furnishings, household appliances, tools and equipment for the house and garden, bulky pet products, audio-visual, photographic and information processing equipment, and bulky durables for recreation and leisure. The floorspace devoted to “ancillary products” shall not exceed 20% of the total net retail floorspace of the unit. The unit shall be decorated to a high standard.

6.3 Change of Use

I consider that the proposal does not comprise works as defined above. Consideration must then be given as to whether any material change in the use of any structures or other land have or will take place. The unit permitted under TP16/36977 is as retail warehouse. Condition 2(a) defines and limits the use of the permitted unit as follows;

2. (a) The retail warehouse unit hereby permitted shall be used for the sale of bulky goods as defined in the Retail Planning Guidelines 2012 only and shall not be used for mainstream comparison or convenience retail use. The retail floorspace devoted to ancillary products shall not exceed 20% of the total net retail floorspace of the hereby permitted retail warehouse unit.

The Section 5 request details that the proposed use is:

*“It is hoped that the unit once acquired, can be used for the **sale of a mix of variety bulky goods including furniture and furnishings, household appliances, tools and equipment for the***

house and garden, bulky pet products, audio-visual, photographic and information processing equipment, and bulky durables for recreation and leisure. The floorspace devoted to “ancillary products” shall not exceed 20% of the total net retail floorspace of the unit. The unit shall be decorated to a high standard.

From the details submitted, there does not appear to be any change of use proposed i.e. it has permission as a retail warehouse unit under TP16/36997 and has been in use as same (bulky electrical items) and the proposal is to use it as a retail warehouse for bulky items.

Further to same, Condition 2a) of the grant of permission attached to this unit limits its use to retail warehouse and bulky goods as defined in the Retail Planning Guidelines 2012. The details submitted under the Section 5 state that the proposed unit shall be for *for the sale of a mix of variety bulky goods including furniture and furnishings, household appliances, tools and equipment for the house and garden, bulky pet products, audio-visual, photographic and information processing equipment, and bulky durables for recreation and leisure. The floorspace devoted to “ancillary products” shall not exceed 20% of the total net retail floorspace of the unit.* Based on same, the proposal appears to be in compliance with the condition attached to the permission.

As there is no change of use proposed, and no works to the existing unit, the proposal is not considered development.

6.4 Exempted development

The next issue for consideration is whether or not the matter at hand is exempted development. As the proposal is not considered development, the question as to whether it is exempted development is not relevant.

7. ENVIRONMENTAL ASSESSMENT

7.1 Screening for Environmental Impact Assessment

Having regard to the contents of Article 103 (as amended by Article 14 of the Planning and Development (Amendment) (No 3) Regulations 2011) and Schedule 7 of the Planning and Development Regulations 2001 (as amended) it is considered that the proposed development by reason of its nature, scale and location would not be likely to have significant effects on the environment. Accordingly it is considered that an environmental impact statement is not required to be submitted.

7.2 Screening for Appropriate Assessment

Section 177U (9) of the Act requires planning authorities to screen applications for a section 5 declaration for appropriate assessment. The provisions of the *Habitats Directive*, the *Appropriate Assessment Guidelines for Planning Authorities 2009* (revised 2010) and the Act are noted. The relevant European sites are the Cork Harbour SPA (site code 004030) and the Great Island Channel cSAC (site code 001058). Having regard to the location of the proposed development site relative to these European sites and related watercourses and to the nature and scale of the proposed development it is considered that the proposed development would not affect the integrity of the European sites referred to above. Accordingly, it is considered that appropriate assessment is not required.

8. Conclusion

The question has been asked:

Whether the use of the structure as a retail warehouse selling mixed variety bulky household goods constitutes development? If it does constitute development, is it exempt?

It is considered that the proposed “use as a retail warehouse selling bulky household goods” is the same use as granted permission under TP16/36977. There are no works proposed to the structure.

Therefore, the proposal is not considered development. The further question as to whether it is exempt no longer applies due to this conclusion.

9. RECOMMENDATION

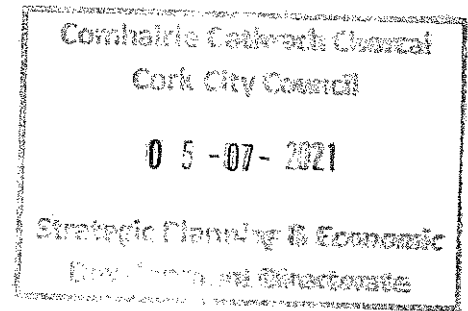
In view of the above and having regard to —

- Sections 2 and 3 of the Planning and Development Act 2000 (as amended), and
- Articles 9 of the Planning and Development Regulations 2001 (as amended),

It is considered that the use of the structure, granted under TP16/36977 as a Retail Warehouse, as a retail warehouse selling mixed variety bulky household goods is **NOT** development. The onus is on the developer to comply with the relevant conditions attached to the existing permission.

Mary Doyle
A/Senior Executive Planner

ASSET
MANAGEMENT LIMITED



The Development Management Section
Community, Culture and Placemaking Directorate
Cork City Council
City Hall
Anglesea Street
Cork

Monday, 28 June 2021

RE: Application under Section 5 of the Planning and Development Act 2000 (as amended) for a Declaration in respect of whether a change of use from a Retail Warehouse (selling home electrical and entertainment products) (permitted under planning permission reference 16/36977) to a Retail Warehouse (selling mixed variety bulky household goods) constitutes development and, if so, is it exempted development at Retail Unit B, Phase 2, Kinsale Retail Park, Cork

Applicant: Hawk Asset Management Ltd

Dear Sir/Madam,

Hawk Asset Management Ltd hopes to acquire the above unit and to trade from it as a Retail Warehouse selling mixed variety bulky goods. It is in this context that a section 5 declaration is sought.

Planning Permission

The unit was constructed pursuant to Planning Permission 16/36977. The permission contains the following relevant conditions:

'2(a) The retail warehouse unit hereby permitted shall be used for the sale of bulky goods as defined in the Retail Planning Guidelines 2012 only, and shall not be used for mainstream comparison or convenience retail use. The retail floorspace devoted to ancillary products shall not exceed 20% of the total net retail floorspace of the hereby permitted retail unit.

(b) The retail warehouse unit hereby permitted shall not be used for the bulk sale of building materials such as sand, gravel or concrete blocks.

The purpose of these planning conditions is *'to define the scope of the permission and to ensure that the type of use conforms to the requirements of the City Development Plan 2015 including paragraph 4.40 and Objective 4.13 and the Retail Planning Guidelines 2012.'*

Paragraph 40 of the Cork City Development Plan 2015 provides:

'The quality and provision of retail warehousing / bulky goods facilities throughout the Metropolitan area varies considerably, from planned Retail Parks such as Mahon, Blackpool and Kinsale Road Retail Parks to ad-hoc retail warehouses within industrial zones such as the Tramore Road.

Objective 4.13 of the Cork City Development Plan 2015 provides:

'It is an objective that the range of goods sold in retail warehouses be restricted to the sale of bulky household items. The floorspace within retail warehouse / bulky goods units devoted to 'ancillary products' shall not exceed 20% of the total net retail floorspace of the relevant retail warehouse / bulky goods unit.'

Bulky goods are defined in the Retail Planning Guidelines 2012 as:

*Goods generally sold from retail warehouses where DIY goods or goods such as flatpack furniture are of such size that they would normally be taken away by car and not be portable by customers travelling by foot, cycle or bus, or that a large floorspace would be required to display them **e.g.***

- *Repair and maintenance materials*
- *Furniture and furnishings*
- *Carpets and other floor coverings*
- *Household appliances*
- *Tools and equipment for the house and garden*
- *Bulky nursery furniture and equipment including perambulators*
- *Bulky pet products such as kennels and aquariums*
- *Audio-visual, photographic and information processing equipment*
- *Catalogue shops and other bulky durables for recreations and leisure.*

Existing Use

The unit has most recently been used as a retail warehouse selling home electrical and entertainment products to include major electrical goods (white goods), audio visual equipment (brown goods), digital and technology and ancillary products.

Proposed Use

It is hoped that the unit, once acquired, can be used for the sale of mixed variety bulky goods including furniture and furnishings, floor coverings, household appliances, tools and equipment for the house and garden, bulky pet products, audio-visual, photographic and information processing equipment, and bulky durables for recreation and leisure. The floorspace devoted to 'ancillary products' shall not exceed 20% of the total net retail floorspace of the unit. The unit shall be decorated to a high standard.

Submission

Company Registration Number: IE666337

Registered Office: [REDACTED], [REDACTED], [REDACTED]



ASSET
MANAGEMENT LIMITED

It is submitted in the first instance that the proposed use is within the same use class as the current/most recent use and therefore there has been no material change for the purposes of section 3(1) of the Planning and Development Act 2000. As a result there has been no development for the purposes of that section.

In the alternative and strictly without prejudice to the submission above, it is submitted that any development is exempted by virtue of the application of Regulation 10 of the Planning and Development Regulations 2001 (as amended) as it consists of a change of use within class one of Part 4 of Schedule 2 of those regulations. A retail warehouse is simply a particular type of shop. The total gross retail sales space of the unit is less than 6,000 square metres, therefore it is not excluded from the application of regulation 10 by the saver at regulation 10(2)(b).

Conclusion

In view of the above the planning authority is invited to confirm by declaration that the proposed use of the unit as a retail warehouse selling mixed variety bulky goods is not development for the purpose of section 3(1) of the Planning and Development Act or, in the alternative, if the proposed use does constitute development, that that use is exempted development for the purpose of the 2000 Act.

Yours Faithfully,



Hawk Asset Management Limited.

COMHAIRLE CATHRACH CHORCAÍ
CORK CITY COUNCIL

Community, Culture & Placemaking Directorate,
Cork City Council, City Hall, Anglesea Street, Cork.

R-Phost/E-Mail planning@corkcity.ie

Fón/Tel: 021-4924762

Líonra/Web: www.corkcity.ie

SECTION 5 DECLARATION APPLICATION FORM
under Section 5 of the Planning & Development Acts 2000 (as amended)

1. POSTAL ADDRESS OF LAND OR STRUCTURE FOR WHICH DECLARATION IS SOUGHT

Retail Unit B, Phase 2, Kinsale Retail Park, Cork.

2. QUESTION/ DECLARATION DETAILS

PLEASE STATE THE SPECIFIC QUESTION FOR WHICH A DECLARATION IS SOUGHT:

Sample Question: Is the construction of a shed at No 1 Wall St, Cork development and if so, is it exempted development?

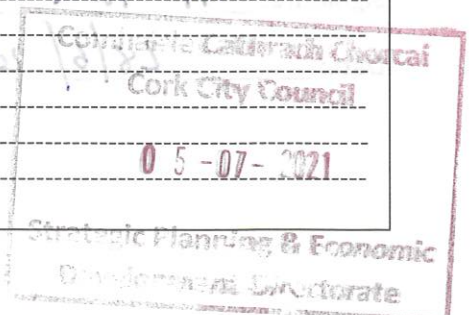
Note: only works listed and described under this section will be assessed under the section 5 declaration.

Does the use of the structure as a retail (development) warehouse selling mixed variety bulky household goods constitute development? If it does constitute development, is it exempt development?

ADDITIONAL DETAILS REGARDING QUESTION/ WORKS/ DEVELOPMENT:

(Use additional sheets if required).

See cover letter enclosed.



3. Are you aware of any enforcement proceedings connected to this site?

If so please supply details:

NO

4. Is this a Protected Structure or within the curtilage of a Protected Structure? NO

If yes, has a Declaration under Section 57 of the Planning & Development Act 2000 been requested or issued for the property by the Planning Authority? N/A

5. Was there previous relevant planning application/s on this site?

If so please supply details:

16 / 36977

6. APPLICATION DETAILS

Answer the following if applicable. Note: Floor areas are measured from the inside of the external walls and should be indicated in square meters (sq. M)

(a) Floor area of existing/proposed structure/s	974m ²
(b) If a domestic extension, have any previous extensions/structures been erected at this location after 1 st October, 1964, (including those for which planning permission has been obtained)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If yes, please provide floor areas. (sq m)
(c) If concerning a change of use of land and / or building(s), please state the following:	
Existing/ previous use (please circle)	Proposed/existing use (please circle)
-----	RETAIL WAREHOUSE SELLING MIXED
-----	TYPE BULKY HOUSEHOLD GOODS
-----	-----

8. LEGAL INTEREST

Please tick appropriate box to show applicant's legal interest in the land or structure	A. Owner	B. Other <input checked="" type="checkbox"/>
Where legal interest is 'Other', please state your interest in the land/structure in question	POTENTIAL ACQUIRER	
If you are not the legal owner, please state the name and address of the owner if available	Motor Services Ltd 1 Stokes Place Stephens Green, Dublin 2	

9. I / We confirm that the information contained in the application is true and accurate:

Signature: 11 Paul Keenan

Date: 28/6/2021

CONTACT DETAILS

10. Applicant:

Name(s)	Hawk Asset Management
Address	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div>

11. Person/Agent acting on behalf of the Applicant (if any):

Name(s):	N/A
Address:	<div style="border-bottom: 1px dashed black; height: 20px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px dashed black; height: 20px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px dashed black; height: 20px; margin-bottom: 5px;"></div>
Telephone:	
E-mail address:	
Should all correspondence be sent to the above address? <small>(Please note that if the answer is 'No', all correspondence will be sent to the Applicant's address)</small>	Yes <input type="checkbox"/> No <input type="checkbox"/>

12. ADDITIONAL CONTACT DETAILS

The provision of additional contact information such as email addresses or phone numbers is voluntary and will only be used by the Planning Authority to contact you should it be deemed necessary for the purposes of administering the application.

ADVISORY NOTES:

The application must be accompanied by the required fee of €80

The application should be accompanied by a site location map which is based on the Ordnance Survey map for the area, is a scale not less than 1:1000 and it shall clearly identify the site in question.

Sufficient information should be submitted to enable the Planning Authority to make a decision. If applicable, any plans submitted should be to scale and based on an accurate survey of the lands/structure in question.

The application should be sent to the following address:

**The Development Management Section, Community, Culture & Placemaking Directorate,
Cork City Council, City Hall, Anglesea Street, Cork.**

- The Planning Authority may require further information to be submitted to enable the authority to issue the declaration.
- The Planning Authority may request other person(s) other than the applicant to submit information on the question which has arisen and on which the declaration is sought.
- Any person issued with a declaration may on payment to An Bord Pleanála refer a declaration for review by the Board within 4 weeks of the date of the issuing of the declaration.
- In the event that no declaration is issued by the Planning Authority, any person who made a request may on payment to the Board of such a fee as may be prescribed, refer the question for decision to the Board within 4 weeks of the date that a declaration was due to be issued by the Planning Authority.

The application form and advisory notes are non-statutory documents prepared by Cork City Council for the purpose of advising as to the type information is normally required to enable the Planning Authority to issue a declaration under Section 5. This document does not purport to be a legal interpretation of the statutory legislation nor does it state to be a legal requirement under the Planning and Development Act 2000 as amended, or Planning and Development Regulations 2001 as amended.

DATA PROTECTION: The use of the personal details of planning applicants, including for marketing purposes, may be unlawful under the Data Protection Act 1988-2003 and may result in action by the Data Protection Commissioner against the sender, including prosecution.

ADVISORY NOTES

The application form and advisory notes are non-statutory documents prepared by Cork City Council for the purpose of advising as to the type information is normally required to enable the Planning Authority to issue a declaration under Section 5. This document does not purport to be a legal interpretation of the statutory legislation nor does it state to be a legal requirement under the Planning and Development Act 2000 as amended, or Planning and Development Regulations 2001 as amended.

The application should be sent to the following address:

The Development Management Section, Community, Culture & Planning Directorate,
Cork City Council, City Hall, Arlington Street, Cork.

Planning Pack Map

CENTRE COORDINATES:
ITM 567857,569893

PUBLISHED: 15/06/2021
ORDER NO.: 50200212_1

MAP SERIES: 1:1,000
MAP SHEETS: 6427-05
6428-01

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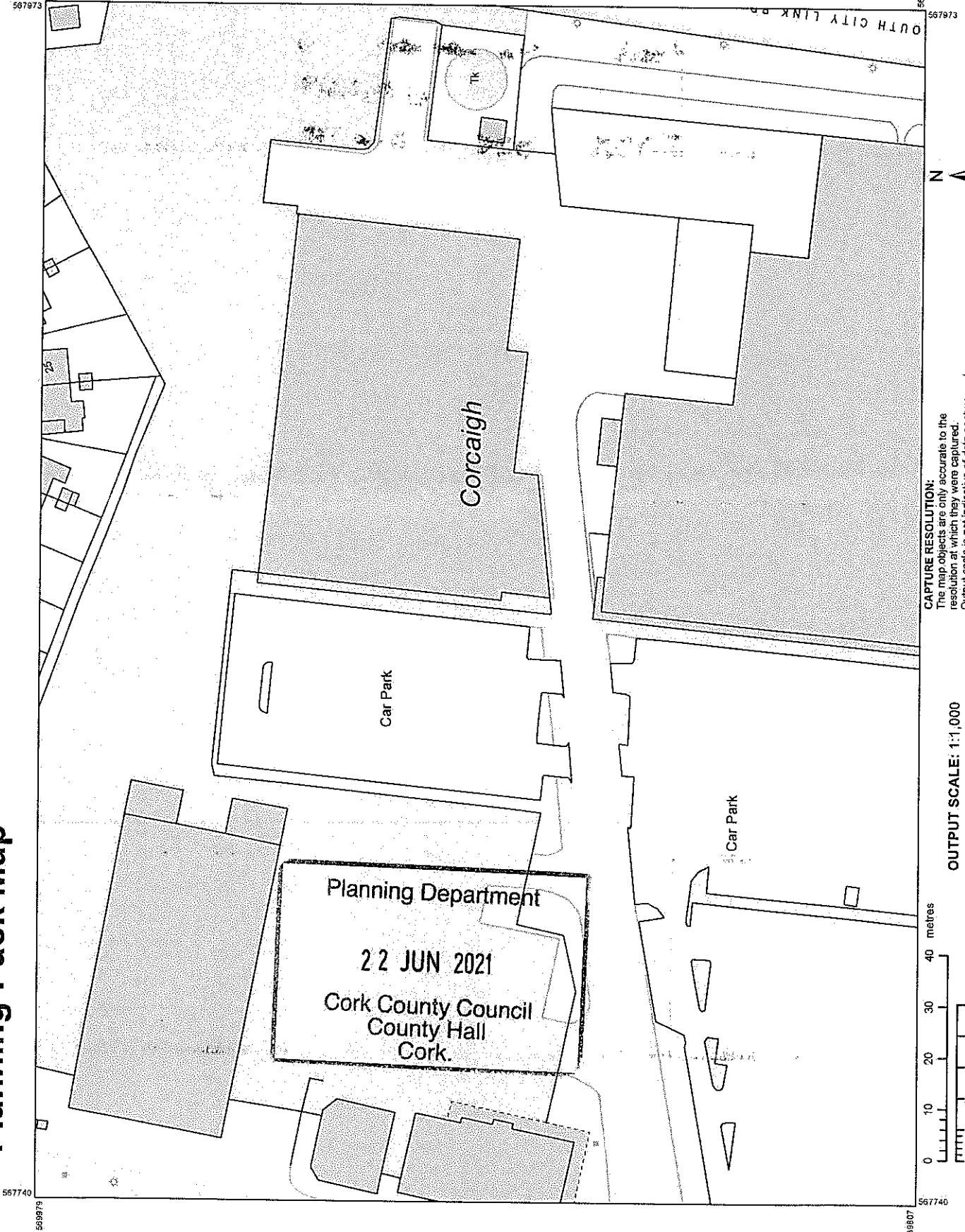
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search 'Large Scale Legend'



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The map objects are only accurate to the
resolution at which they were captured.
Output scale is not indicative of data capture scale.
Further information is available at:
<http://www.osi.ie>; search 'Capture Resolution'

OUTPUT SCALE: 1:1,000

1. Name of the project
 2. Location of the project
 3. Description of the project
 4. Objectives of the project
 5. Justification of the project
 6. Budget of the project
 7. Risk assessment of the project
 8. Implementation plan of the project
 9. Monitoring and evaluation plan of the project
 10. Conclusion of the project



Planning back map

Site Location Map



National Mapping Agency

CENTRE COORDINATES:
ITM 567857,569893

PUBLISHED: 15/06/2021
ORDER NO.: 50200212_1

MAP SERIES: 6 Inch Raster
MAP SHEETS: CK074

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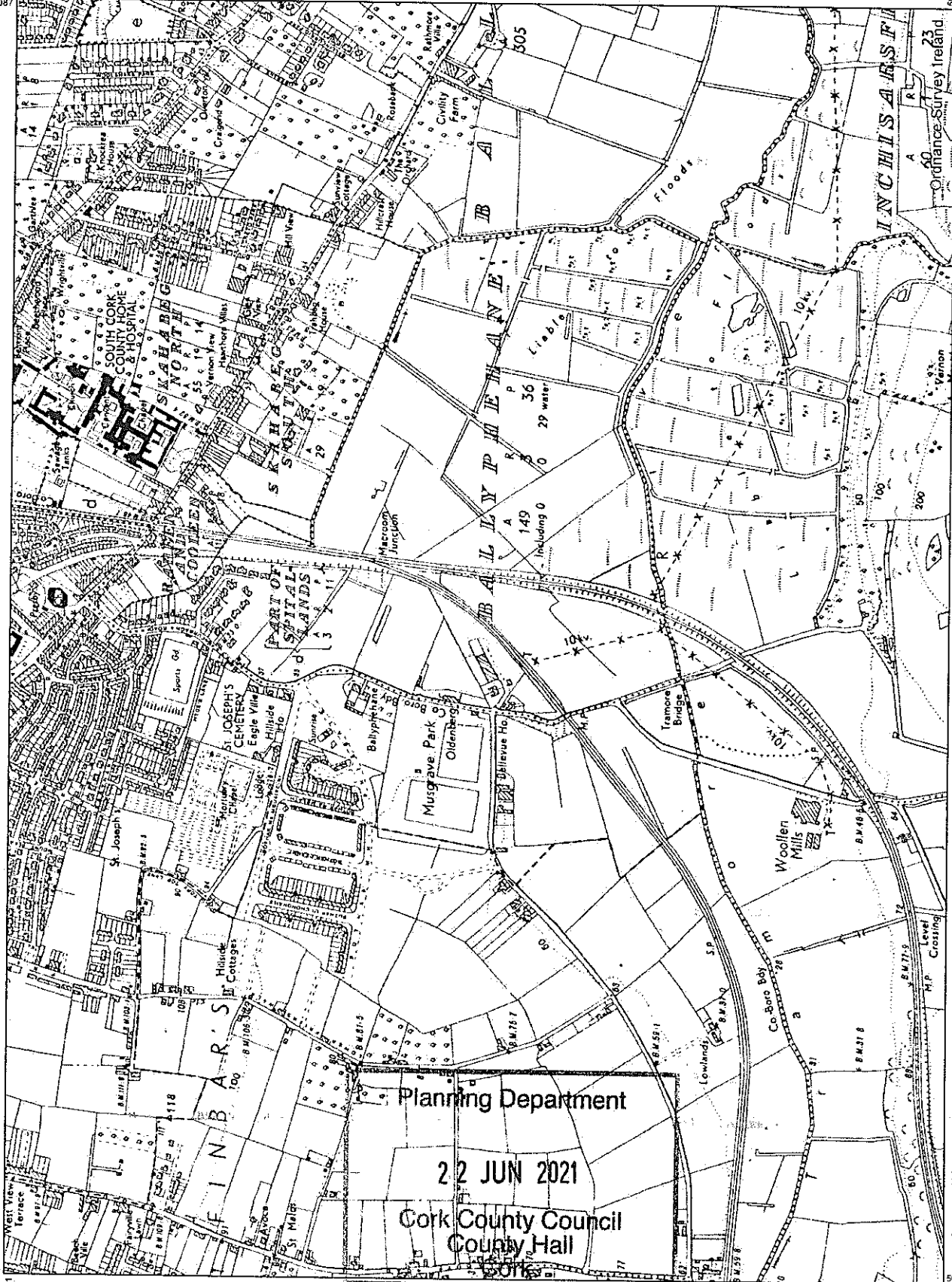
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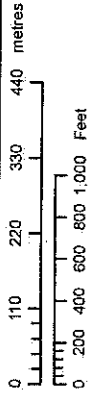
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<http://www.osi.ie/>
search 'Large Scale Legend'



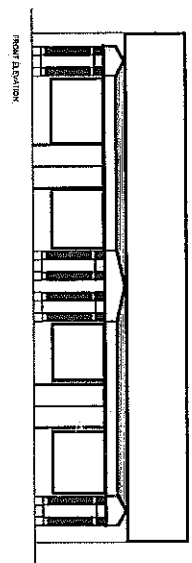
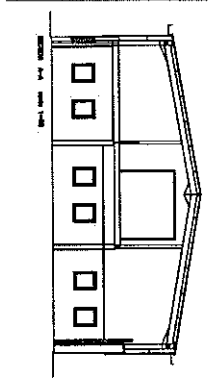
CAPTURE RESOLUTION:
The map objects are only accurate to the
resolution at which they were captured.
Output scale is not indicative of data capture scale.
Further information is available at:
<http://www.osi.ie/>, search 'Capture Resolution'

OUTPUT SCALE: 1:10,560

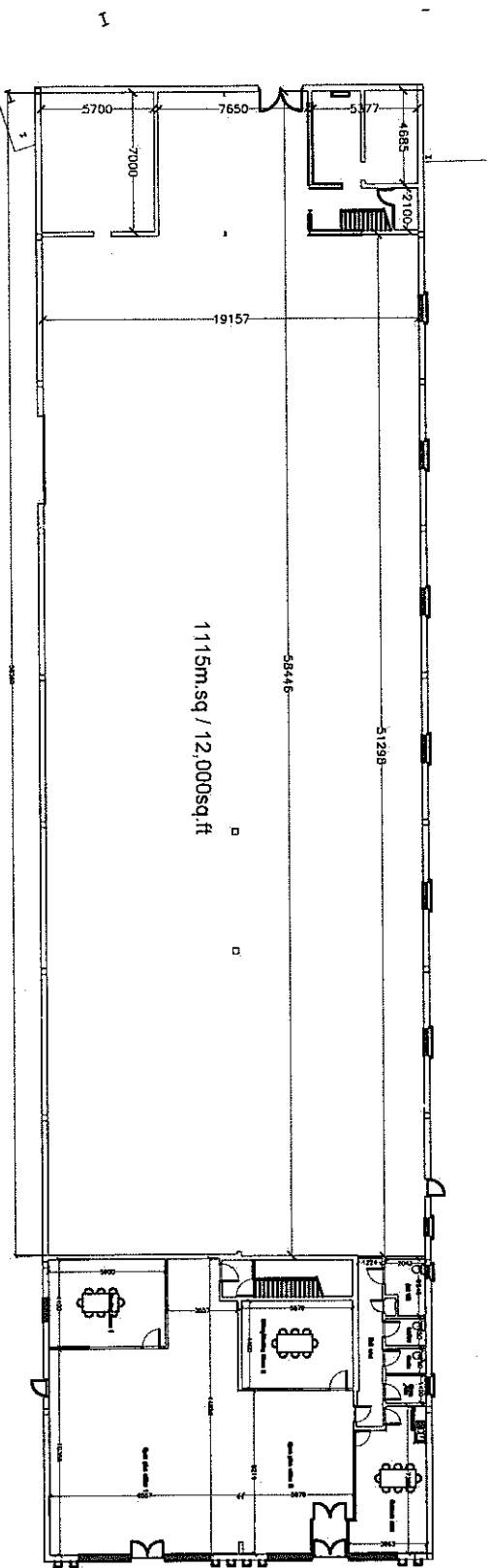
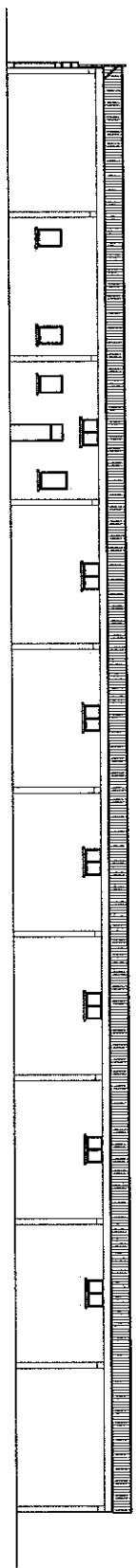
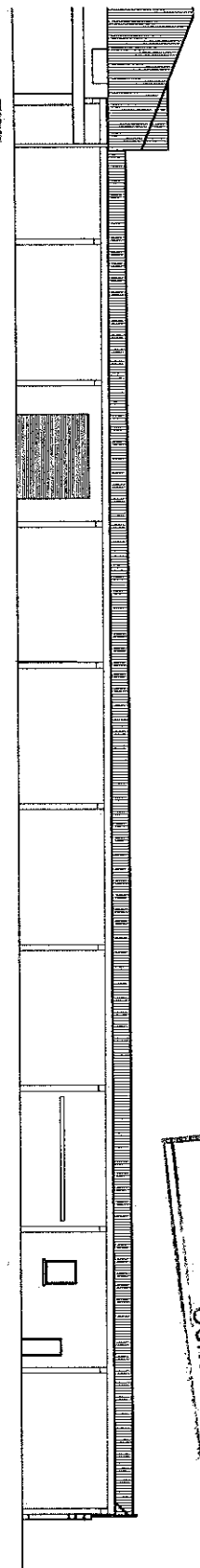


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Planning Department
22 JUN 2021
Cork County Council
Cork County Hall
Cork.




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 ACCOMPANYING SPECIFICATIONS. ANY VARIATIONS OR
 DISCREPANCIES TO BE REPORTED IMMEDIATELY TO THE
 DESIGNER BEFORE ANY WORKS PROCEED.
 ALL DIMENSIONS TO BE CHECKED ON SITE BEFORE WORK
 PROCEEDS.
 TO BE READABLE. USE REQUIRED DIMENSIONS ONLY.
 NOT FOR CONSTRUCTION UNLESS STATED OTHERWISE.

DATE	REVISIONS
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Survey

STAGE:	
CLIENT:	Martin Heady
JOB NO:	
PROJECT:	Survey of premises at Marthy'r Road, Nenagh Tipperary.
TITLE:	Plans, Elevation, Section
DWG NO.:	SV-01
REVISION:	1st
SCALE:	1/200
DRAWN BY:	SAR
CHECK:	
DATE:	