

**Submission on
RESIDENTIAL ZONED LAND TAX
– THE DRAFT MAPS**

**Lands at
Newtownmountkennedy,
Co. Wicklow**

**Parcel ID: WW1326, WW1440,
WW1431, WW1432, WW1437**

On behalf of



December 2022



Planning & Development Consultants

63 York Road,

Dun Laoghaire

Co. Dublin

www.brockmcclure.ie

1 EXECUTIVE SUMMARY

This planning submission is made on behalf of [REDACTED] in relation to lands at Newtownmountkennedy, Co. Wicklow.

This submission responds to the publication of ‘The Draft Maps’ for County Wicklow for Residential Zoned Land Tax (RZLT). In review of the maps published, our client has examined whether or not lands within their ownership fall into scope for liability and payment of Residential Zoned Land Tax.

We request that the content of this submission be considered in the preparation of ‘The Supplemental Maps’ and ‘The Final Maps’ in 2023.

By way of an executive summary, we ask that the following actions be taken:

The removal of the lands the subject of this submission within the ownership of our client [REDACTED] from the RZLT maps and specifically ‘The Supplemental Maps’ and ‘The Final Maps’ due to be published in 2023.

It is submitted that these lands do not fall within the scope of The Section 653B and 653C of the Taxes Consolidation Act 1997 as amended.

The details of this site; the rationale for this request; and the justification for the removal of the lands from the Residential Zoned Land Tax mapping is now set out within this report.

2 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this planning submission on behalf of [REDACTED] in relation to lands to the west of Newtownmountkennedy, Co. Wicklow.

More specifically, this submission is prepared as a response to the publication by Wicklow County Council 'The Draft Maps' associated with the RZLT. This submission is lodged to ensure a number of matters in relation to our client's landholding at Newtownmountkennedy are considered by Wicklow County Council in preparation of 'the Supplemental Maps' and 'the Final Maps' in 2023.

We acknowledge that submissions are welcomed on 'The Draft Maps' up to and including **1 January 2023**. This submission is lodged within this deadline.

2.1 Submission Requirements

Wicklow County Council have clearly set out a list of requirements that must be included with any submission lodged during the public consultation period for the Draft Maps.

The various requirements of the Local Authority together with our client's response is set out below:

Wicklow County Council Requirement	Response by [REDACTED]
Site Location	Lands at Newtownmountkennedy, Co. Wick ow
Name and Address of Landowner	[REDACTED]
Name and Address of Agent	Brock McClure Planning and Development Consultants, 63 York Road, Dun Laoghaire, Co. Dub in. he o@brockmcc ure.ie 01 559 3859
OS Map (Identifying lands subject of this submission at a scale of 1:2500)	Enc osed as part of this submission. (Prepared by BBA Architects)
Proof of Ownership	Enc osed as part of this submission. (We refer to Confirmation of Ownership Letter)
Supporting Matters for Lands not considered to be in Scope or Date for Lands not considered to be in Scope	Set out in this Submission
Reference to Section 653b of the Taxes Conso idation Act and Supporting Evidence	Set out in this Submission
Justification for Exc usion of Lands	Set out in this Submission
Fo io Detai s	WW29159F (P an 223), WW29159F (P an 227), WW29159F (P an 223), WW4633F (P an 2A), WW4632F (P an 109), WW28131F (P an A87JK), WW8684F (P an 76A), WW3848 (P an 1), WW30735F (P an 5),

	<p>WW23355F (P an A20V7), WW27998F (P an 4), WW23355F (P an A20WA), WW27998F (P an224), WW7230F (P an 62), WW7230F (P an 3), WW3848 (P an C4A91), WW35605F (P an C2U50), WW38409F (P an 6), WW2960 (P an C4BAG), 2x unregistered and (We refer to Appendix – Draft Map 1)</p>
RZLT Land Parce ID	WW1326, WW1440, WW1431, WW1432, WW1437

Table 1 Submission Requirements

3 SITE AND ZONING CONTEXT

3.1 Site Details & Development Description

Our client holds an extensive landbank (19.26ha) in the townland of Newtownmountkenny, Co. Wicklow. Planning permission has been granted for an extensive residential development comprising houses and apartments, with sites zoned for town centre uses, community and educational facilities. Infrastructural works have also been permitted as part of the overall development proposal for the lands.



Subject Site Location & Context

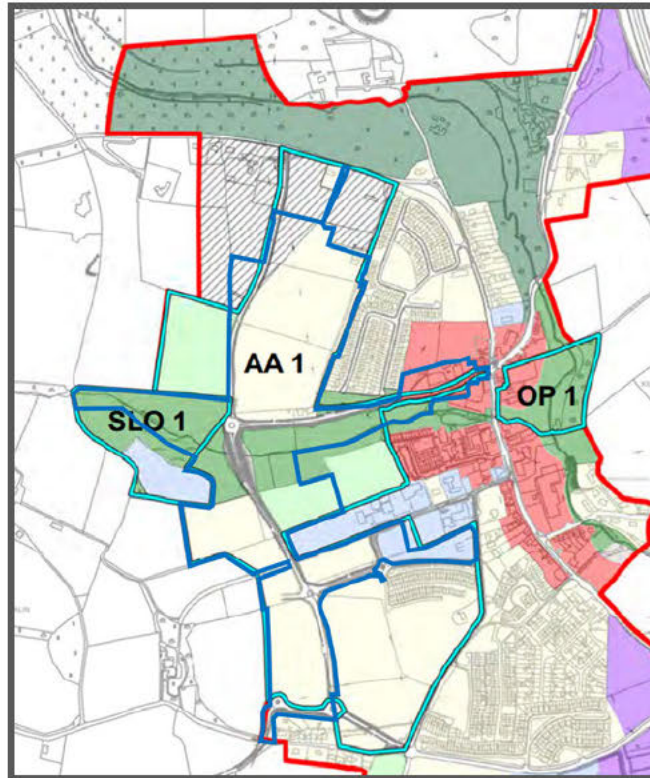
3.2 Site Zoning & Planning Context

The subject lands are governed by the Wicklow County Development Plan 2022-2028 which describes Newtownmountkenny as a Self-Sustaining Town/ Level 4 described as “Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.”

More specifically, the development of the area falls under Town Plans – Level 4 – Newtownmountkenny within the Development Plan, and an Action Area Plan for Monalin – Season Park, in which the subject lands are located.

In the context of the RZLT, we note that this Action Area Plan states:-

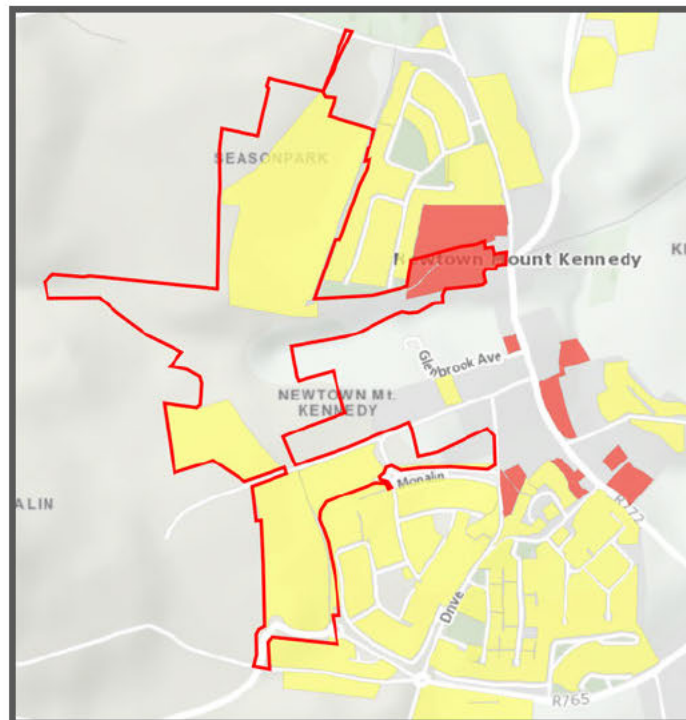
*“The new distributor / access road shall continue to be developed as permitted (unless alterations in route and / or phasing are approved by way of a revised permission) between the Roundwood Road and the L1037. **This road shall be for the purpose of opening up this development parcel** and to ensure that the traffic movements generated by the proposed uses on these lands are not channelled onto a single junction. This road shall be linked into the Main Street at a suitable location. This road will distribute vehicular, cyclist and pedestrian movement on a north / south axis within AA1; provide alternative circulation to Main Street with the option of a further schools access from new housing areas to the west.”*



Development Plan Zoning Map Subject Lands Outlined in Blue

3.3 The Draft Maps

The extent of our client's landholding vis-a-vis the Draft Mapping published for Newtownmountkenny is set out below:-



Residential Zoned Land Tax Draft Map Subject Lands Outlined in Red

4 PLANNING HISTORY

A brief synopsis of the residential planning history pertaining to our client's overall landholding is now set out.

Parent Permission - Reg Ref. 06/6101 PL 27.227704

Permission was **GRANTED** by the An Bord Pleanála on 22.12.2008 after the 3rd party appeal for demolition of all structures on site and the construction of 861 no. residential units, provision of neighbourhood centre facilities; provision of 4 no. crèches and the construction of connector and distributor roads within the site. The life of this permission was extended under ref. 18/381 to 2024.

Reg. Ref: 09/1359

Permission was **GRANTED** by the Council for minor revisions to previously granted Planning Reg Ref 06/6101 to include provision of a new access road to serve adjoining residentially zoned lands.

Reg. Ref: 12/6477 PL 27.241521

Permission was **GRANTED** by the An Bord Pleanála for alterations to previously granted planning permission Pl. Reg. Ref: 06/6101 (PL.27.227704) to include the following: (1) The change of house types within estate No1. (2) Amendments to condition 8 (phasing) of PL.27.227704: (a) To allow for the construction of development within Estate No1 ahead of the Western Distributor Road from points A to L as required by condition 8(c), (b) To allow for the construction of development within Estate No1 ahead of the road improvement works from points A to F as required by condition 8(d). (c) To allow for the occupation of the residential units within Estate No1 ahead of the section of the central greenway to the west of the Western Distributor Road as currently required by condition 8(h). (3) Permission is also being sought for the provision of a temporary open space area on the EC1 zoned lands to serve the residential development within Estate No1.

Reg. Ref: 17/135

Permission was **GRANTED** by the Council for 24 no dwelling units, public open space, connection to public services and all ancillary site works and services.

Reg Ref. 18/381

Permission was **GRANTED** by the Council on 03.05.2018 for extending the appropriate period of a permission by further 5 years - 06/6101. This permission will cease in 2024.

Conclusion

Evidently, there has been a clear and 'plan led' approach to the development of our overall client's landholding with the phasing of residential blocks 'estates' dependent upon the progression of the rollout of the distributor and connector roads and other such infrastructure on the lands.

In this regard, it will be some time before all of these 'estates' within the overall site are delivered and operational and this is a key point for consideration at this time.

5 RELEVANT PROVISIONS OF THE TAXES CONSOLIDATION ACT 1997 AS AMENDED

The Planning Authority has clearly set out that any submission on ‘the Draft Maps’ must address the requirements of Section 653B of the Taxes Consolidation Act 1997. Section 653C is also considered in this section for context purposes, given its relevance in terms of dates for lands falling in to scope.

The relevant provisions of these sections together with a considered response is now set out below.

5.1 Section 653B

Section 80 of the Finance Act 2021 amends 653B of the Taxes Consolidation Act 1997.

The following is an excerpt is of relevance in the context of the current submission:

Lands in Scope

Section 653B of the Taxes Consolidation Act 1997 has been amended to read:

“653B. In this Part, a reference to land which satisfies the relevant criteria is a reference to land that—

(a) is included in a development plan, in accordance with section 10(2)(a) of the Act of 2000, or local area plan, in accordance with section 19(2)(a) of the Act of 2000, zoned—

(i) solely or primarily for residential use, or

(ii) for a mixture of uses, including residential use,

b) it is reasonable to consider **may have access, or be connected, to public infrastructure and facilities, including roads and footpaths, public lighting, foul sewer drainage, surface water drainage and water supply**, necessary for dwellings to be developed and with sufficient service capacity available for such development, and

(c) it is reasonable to consider is not affected, in terms of its physical condition, by matters to a sufficient extent to preclude the provision of dwellings, including contamination or the presence of known archaeological or historic remains,

but which is not land—

(i) that is referred to in paragraph (a)(i) and, having regard only to development (within the meaning of the Act of 2000) which is not unauthorised development (within the meaning of the Act of 2000), is in use as premises, in which a trade or profession is being carried on, that is liable to commercial rates, that it is reasonable to consider is being used to provides services to residents of adjacent residential areas,

(ii) that is referred to in paragraph (a)(ii), unless it is reasonable to consider that the land is vacant or idle,

(iii) that it is reasonable to consider is required for, or is integral to, occupation by—

(I) social, community or governmental infrastructure and facilities, including infrastructure and facilities used for the purposes of public administration or the provision of education or healthcare,

(II) transport facilities and infrastructure,

(III) energy infrastructure and facilities,

(IV) telecommunications infrastructure and facilities,

(V) water and wastewater infrastructure and facilities,

(VI) waste management and disposal infrastructure, or

(VII) recreational infrastructure, including sports facilities and playgrounds,

- (iv) that is subject to a statutory designation that may preclude development, or
(v) on which the derelict sites levy is payable in accordance with the Derelict Sites Act 1990 .”

In summary, any lands considered to be in scope must (a) be zoned for residential development and (b) have access, or be connected, to public infrastructure and facilities. There are also a number of infrastructural and community service items cited which may lead to an exemption for the tax as set out by Section 653B(c)(iii).

5.2 Applicant Response to Section 653B

1. We can confirm that the lands subject of this submission are zoned for residential development by virtue of their zoning designation under the Wicklow County Development Plan, and further specified under the Newtownmountkennedy Action Area Plan.

On this basis, the lands the subject of this submission fulfil the requirements of 653B(a).

2. As set out in this submission, the lands under the ownership of our client have been allocated for residential development (and permitted for same, along with ancillary commercial and community facilities). However, the rollout of the permitted residential accommodation **cannot** take place until such a time that the permitted road infrastructure has been carried out.

Due to the necessary phasing of development for financial and logistical purposes, there are parcels of land within the overall site (all within our client’s ownership) that are in effect ‘landlocked’ and cannot be developed without the progression of the infrastructural works.

As such these sites cannot be considered as serviced within the realm and understanding of the Residential Zoned Land Tax.

It is further submitted that the development of these ‘estates’/sites is predicated on the delivery of other sites and infrastructural works in earlier stages of the phasing plan. This is a plan led process and it is submitted by our client that they should not be penalised for withholding land for residential development when it is their full intention (by virtue of the planning permission granted, and the operational construction phasing plan) to deliver a high quality residential environment on these lands in the most economically efficient and effective manner possible for both our client as the developer, and the eventual purchasers and occupiers of the homes on these lands.

Ultimately, it is submitted that these lands should not have been included on the ‘Draft Maps’ published by Wicklow County Council nor should they appear on any ‘supplemental maps’ or ‘final maps’ prepared by the Planning Authority until such time that these lands can be considered ‘serviced’ from the roll out of the necessary road infrastructure.

On this basis, the lands subject of this submission do not fulfil the requirements of 653B(b).

3. Consideration should be given to our client’s landholding vis a vis the requirements of 653B(c). We note specifically that the Newtownmountkennedy AAP1 ‘Monalin-Season Park’ clearly references the significance of the permitted ‘*new distributor/access road*’ and that the purposes of its development is to ‘**open up this development parcel**’.

In this regard, it can be considered that without this progression of this infrastructure, the landbank is not considered to be available for development, residential or otherwise. Consequently, the lands the subject of this submission should be removed from the map.

It is on this basis that the lands subject of this submission do not fulfil the requirements of 653B(c).

5.3 Section 653C

Date in Scope

Furthermore, Section 653C (1) of the Taxes Consolidation Act 1997 has been amended to now set out the following:

A local authority shall prepare, in respect of its functional area, a map in draft form (in this Part referred to as a 'draft map')—

(a) indicating land that, based on the information available to it, it considers to be land satisfying the relevant criteria one month prior to the date specified in subsection (2), and

(b) specifying—

(i) the date on which, based on the information available to it, it considers that land referred to in paragraph (a) first satisfied the relevant criteria, where that date is after 1 January 2022, and

(ii) the total area, in hectares, of land referred to in paragraph (a).

In summary, lands considered in scope on the **1 January 2022** are considered liable for the tax.

5.4 Applicant Response to Section 653C

Section 7.2 above has set out the key considerations by way of response to Section 653B. We confirm that those arguments apply with lands not falling into scope by the date of 1 January 2022 or after.

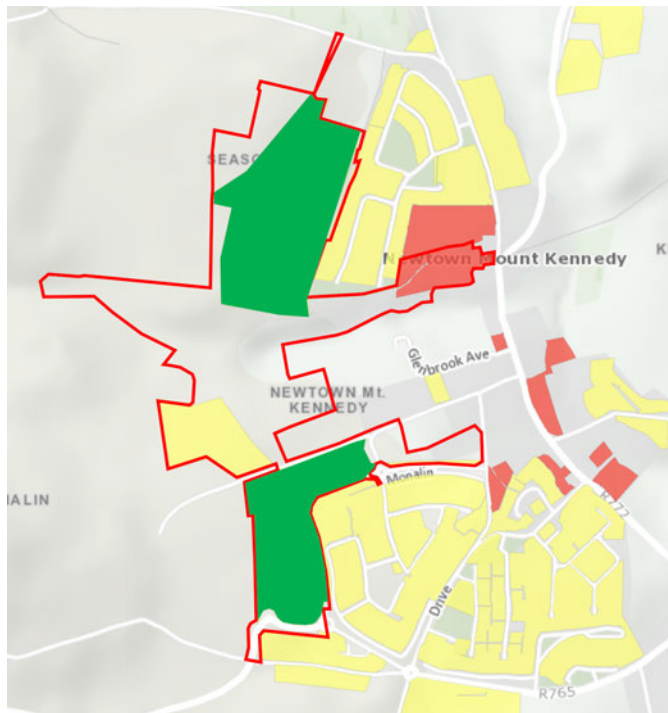
6 JUSTIFICATION FOR THE EXCLUSION OF LANDS

Following the publication of ‘the Draft Maps’ associated with the RZLT, our client has examined:

- (a) the mapping as it relates to NewtownmountKennedy, Co. Wicklow and
- (b) the requirements for lands considered to be in scope for Residential Zoned Land Tax.

Following consideration of these items and our response to Sections 653B and 653C of the Taxes Consolidation Act 1997, this submission is now seeking the following:

The removal of the lands within the ownership of our client [REDACTED] from the RZLT maps and specifically ‘The Supplemental Maps’ and ‘The Final Maps’ due to be published in 2023. The lands subject to this request are outlined below:



Client Lands vis a vis RZLT Mapping lands marked in green to be removed from mapping

Justification

In review of this submission, we ask the Planning Authority to exclude the above lands within our client’s ownership from the ‘Supplemental Maps’ and ‘The Final Maps’ published for the following rationale:-

These portions of lands are not considered to fall into scope given

- (a) They do not have access to road infrastructure until such a time that the other parcels of land within our client’s ownership are released for development and built out in accordance with the phasing plan; and
- (b) These specific parcels of land did not have access to or could not be connect to road infrastructure on the relevant date (on or after 1 January 2022).

There is a significant and plan led development envisioned for the overall landholding at Newtownmountkennedy, and in this regard, ‘estates’ within the overall site will only be released for development once other parcels of land within it are implemented and delivered in full.

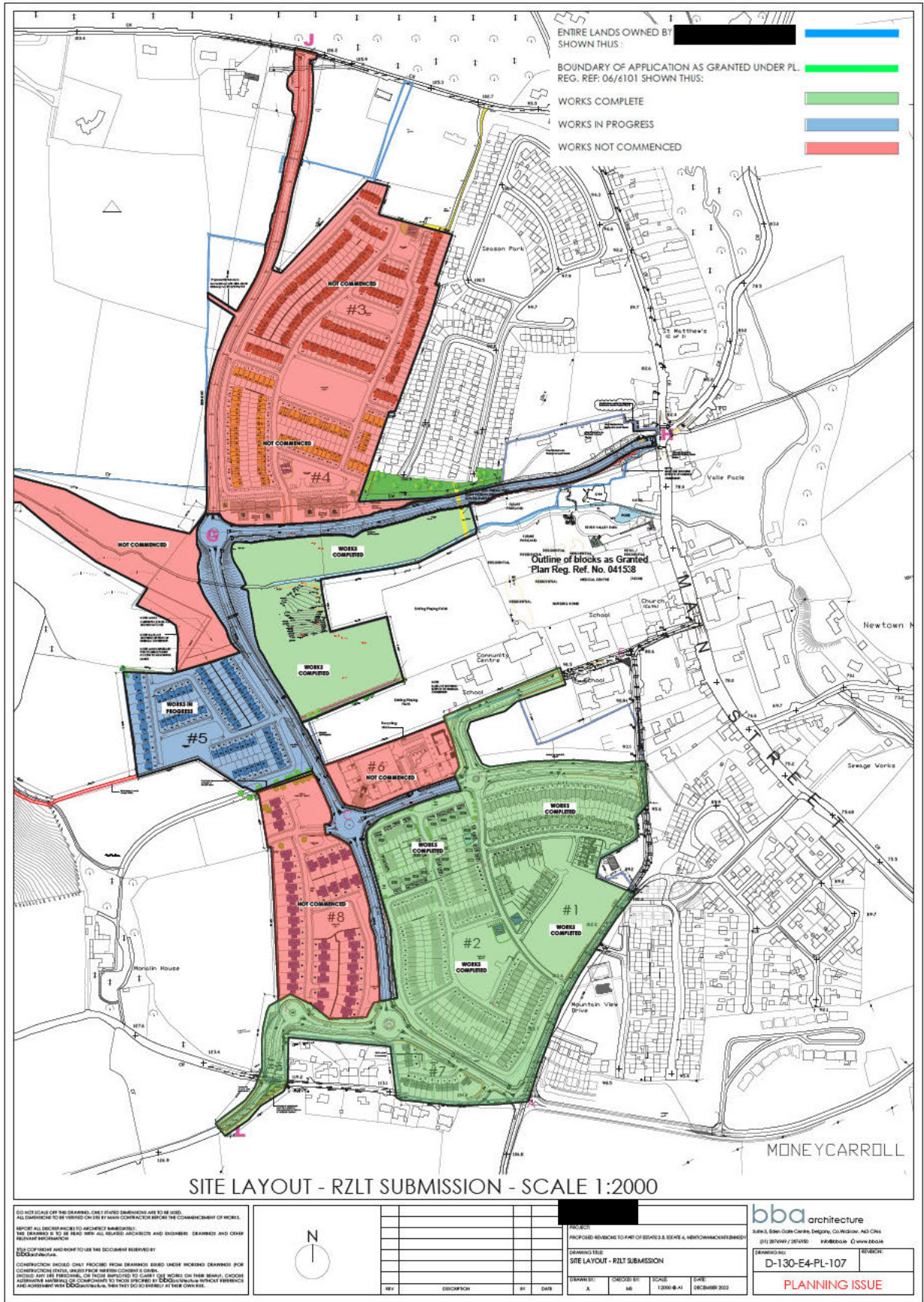
Critical to all of this is the delivery of the new distributor and connector roads outlined for the lands. Until this infrastructure is complete, parcels of land within on our client's site are landlocked and cannot be developed – residentially or otherwise.

Therefore it would be more appropriate for these landlocked sites to be removed from the initial draft maps prepared and subsequent mapping planned for 2023 (supplemental/final maps) and reviewed by the Planning Authority at a more appropriate time. Specifically these portion of lands should only be considered to fall into scope at a time when they have access to / are connected to services. i.e. when the adjacent zoned lands are built out pursuant to their permission.

Furthermore, there is relevant planning policy contained within the Action Area Plan for Monalin-Season Park, in which the subject lands are located. This AAP makes reference to the distributor / access road as permitted, and pertinently, states that the purpose of this road is for **'opening up this development parcel'**. What is clearly evident from this statement within the AAP, is that this road is critical to the viability of these lands for any future development. Should the road not be progressed for whatever reason, these lands cannot be developed out for residential use.

It is in consideration of the above items, that we consider the inclusion of the parcels of land the subject of this proposal within our client's ownership within the "Draft Maps" to be inappropriate and we call for the removal of these lands from any 'Supplemental' or 'Final Maps' prepared in 2023 and following years until such time as these zoned sites are serviced appropriately.

The figure below shows the current development and phasing of the subject lands. As is evident from the map the sites shaded in red (not commenced) are in effect sterile for development until such as time as the lands and works shaded in blue are completed. These 'red' highlighted land parcels are not currently serviced and therefore must be considered out of scope and removed from RZLT mapping.



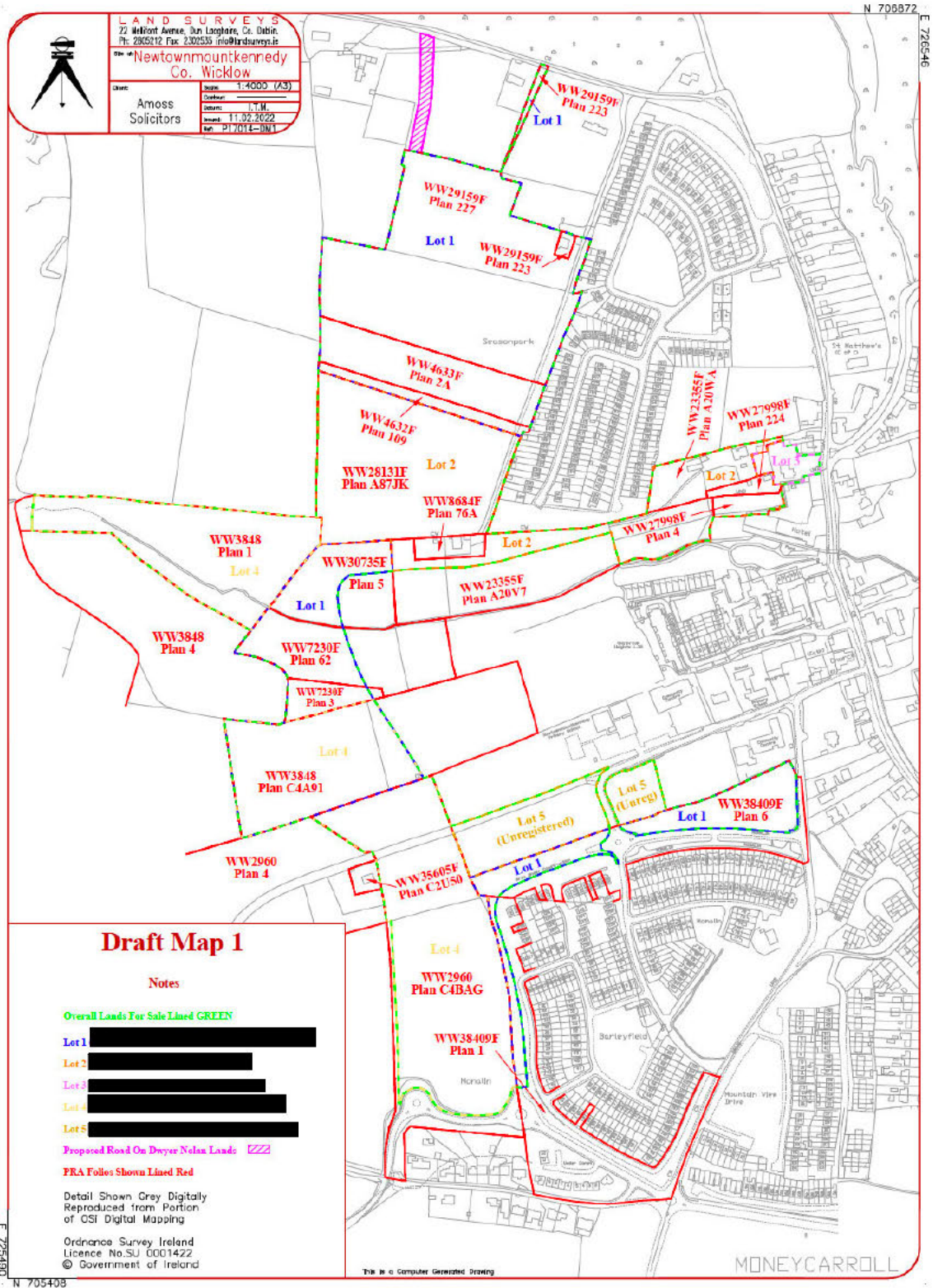
7 CONCLUSION

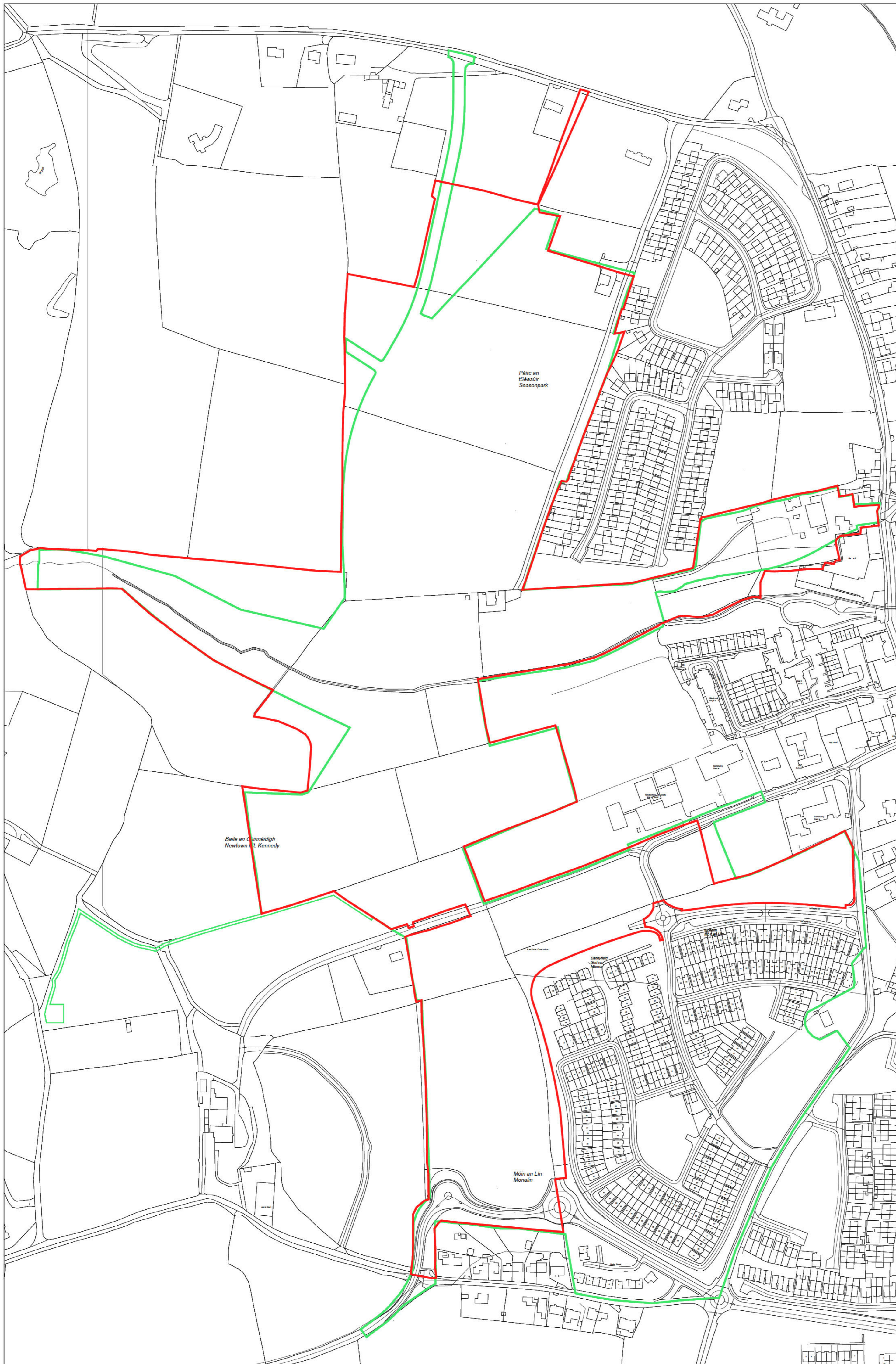
This submission is now seeking the following:-

The removal of the lands within the ownership of our client [REDACTED] from the RZLT maps and specifically 'The Supplemental Maps' and 'The Final Maps' due to be published in 2023, for the reasons and justifications outlined herein.

We trust that the content of this submission will be considered in due course.

APPENDIX





LEGEND:
 ENTIRE LANDS OWNED BY: [Red line]
 SHOWN THIS:
 BOUNDARY OF APPLICATION AS GRANTED UNDER PL: [Green line]
 REG. REF: 06/6101 SHOWN THIS:

License / Copyright:
 Ordnance Survey Ireland 'Terms of Use' apply. Please visit 'www.osi.ie/about/terms-conditions'.
 © Ordnance Survey Ireland, 2021
 Compiled and published by Ordnance Survey Ireland, Phoenix Park, Dublin 8, Ireland.
 Unauthorised reproduction infringes Ordnance Survey Ireland and Government of Ireland copyright.
 All rights reserved. No part of this publication may be copied, reproduced or transmitted in any form or by any means without the prior written permission of the copyright owners.
 The representation on this map of a road, track or footpath is not evidence of the existence of a right of way.
 Ordnance Survey maps never show legal property boundaries, nor do they show ownership of physical features.
 © Suirbhéireacht Ordanáis Éireann, 2021
 Ama thionsú agus ama fhóilsú ag Suirbhéireacht Ordanáis Éireann, Páirc an Fhionnuisce, Baile Átha Cliath 8, Éire.
 Sáralann atáirgeadh neamhúdaraithe cóipcheart Shuirbhéireacht Ordanáis Éireann agus Rialtas na hÉireann.
 Gach cead ar cosnamh. Ní ceadmhach aon chuid den fhóilséachán seo a chóipeáil, a atáirgeadh nó a tharchur in aon fhorm nó ar aon bealach gan cead i scríbhinn roimh ré ó úinéir an chóipchirt.
 Ní hionann bóthar, bealach nó cosán a bheith ar an léarscáil seo agus fianaise ar chead síl.
 Ní thaispeánann léarscáil de chuid Ordanáis Shuirbhéireacht na hÉireann teorann phointí dleathúil de mhaoin riamh, ná úinéireacht de ghnéithe fhisiciúla.

ITM CENTRE PT COORDS
 X,Y= 725968.0,706165.5

DESCRIPTION

MAP SCALES
 Map Series | Map Sheets
 1:2,500 | 3789-B
 1:2,500 | 3789-A
 1:2,500 | 3789-C
 1:2,500 | 3789-D

COPYRIGHT INFO:
 Purchased by:
 bba architecture
 From:
 OSI
 Date:
 10th August 2021
 Order no.
 50212434

LLX,LLY= 725481.0,705425.0
 LRX,LRY= 726455.0,705425.0
 ULX,ULY= 725481.0,706906.0
 URX,URY= 726455.0,706906.0

SITE LOCATION MAP - RZLT 1:2500

DO NOT SCALE OFF THIS DRAWING. ONLY STATED DIMENSIONS ARE TO BE USED. ALL DIMENSIONS TO BE VERIFIED ON SITE BY MAIN CONTRACTOR BEFORE THE COMMENCEMENT OF WORKS.
 REPORT ALL DISCREPANCIES TO ARCHITECT IMMEDIATELY. THIS DRAWING IS TO BE READ WITH ALL RELATED ARCHITECTS AND ENGINEERS DRAWINGS AND OTHER RELEVANT INFORMATION
 TITLE COPYRIGHT AND RIGHT TO USE THIS DOCUMENT RESERVED BY bbaarchitecture.
 CONSTRUCTION SHOULD ONLY PROCEED FROM DRAWINGS ISSUED UNDER WORKING DRAWINGS (FOR CONSTRUCTION) STATUS. UNLESS PRIOR WRITTEN CONSENT IS GIVEN. SHOULD ANY SITE PERSONNEL, OR THOSE EMPLOYED TO CARRY OUT WORKS ON THEIR BEHALF, CHOOSE ALTERNATIVE MATERIALS OR COMPONENTS TO THOSE SPECIFIED BY bbaarchitecture WITHOUT REFERENCE AND AGREEMENT WITH bbaarchitecture, THEN THEY DO SO ENTIRELY AT THEIR OWN RISK.

N	REV	DESCRIPTION	BY	DATE

CLIENT: [Redacted]			
PROJECT: PROPOSED REVISIONS TO PART OF ESTATE 3 & ESTATE 4, NEWTOWNMOUNTKENNEDY			
DRAWING TITLE: SITE LOCATION MAP - RZLT			
DRAWN BY: JL	CHECKED BY: MB	SCALE: 1:2500 @ A1	DATE: DECEMBER 2022

bba architecture
 Suite 3, Eden Gate Centre, Delgany, Co. Wicklow, A63 C966
 ☐ (01) 2876949 / 2876950 ☐ info@bba.ie ☐ www.bba.ie

DRAWING No: D-130-E4-PL-100	REVISION: ----
--------------------------------	-------------------

PLANNING ISSUE

TO WHOM IT CONCERNS

15 December 2022

Our Ref: AA/KM/DRES01/0024

Your Ref:

Our Client:

Matter: [REDACTED]
Lands at Newtown Mountkennedy, County Wicklow

Dear Sirs,

We act on behalf of the Company who acquired the property lined in red on map attached hereto (the "Property") by Deed of Transfer & Conveyance dated 11 November 2022.

The Company's application for registration as owners of the registered portions of the Property is pending in the Land Registry under dealing number D2022LR176979J.

If you have any queries or require any further information, please contact Killian Morris of this office.

Yours faithfully,



AMOSS LLP

A
Warrington House
Mount Street Crescent
Dublin 2
D02 R256

DX
179 007
Ballsbridge 2

T
+353 1 212 0400

F
+353 1 212 0401

E
law@AMOSS.ie

W
www.AMOSS.ie

Partners Alan Adams, Dan Murphy, John O'Sullivan, Gavin Simons, Bríd McCoy, Mary Coffey, Joan Maclean, Killian Morris, Claire McCormack, Jerry Burke, Eoin Thomas McGuinness, Aine Gleeson

Consultants Aileen Cosgrove, Billy Parker, Fergus Hennessy, Kevin Mays

Solicitors Gráinne Adams, Grace Burrowes, David Carroll, Brian Connolly, Sarah Coughlan, Andrea de Courcey, Tanya Egan, Emer Fitzhenry, Olga Gaffney, Niamh Greene, Denise Howlin, Joe Kane, Richie Leahy, Eoin Mackessy, Katie Moylan, Grace Mulvaney, Aoibheann O'Grady, Ruairi O'Malley, Ruth O'Mara, Aislinn Power, Conor Rock, Geoffrey Rooney, Eimear Rothwell, Hazel Ruane, Gary Thompson, Lisa Webb

VAT No 9822355C



DEED OF ASSURANCE

MAP A

THE SOLD LAND

Area: 31,86 Ha

Source / Copyright:
 Ordnance Survey, 2021
 Ordnance Survey is a registered trademark of Ordnance Survey.
 Please visit www.ordnancesurvey.co.uk

© Ordnance Survey 2021
 Compiled and published by Ordnance Survey
 Belfast, Phoenix Park, Dublin 8, Ireland.

Unauthorised reproduction infringes Ordnance Survey's intellectual property rights.

All rights reserved. No part of this publication may be copied, reproduced or transmitted in any form or by any means without the prior written permission of the copyright owner.

This publication is for use as a map, text or data and is not suitable for the purpose of a legal document.

Ordnance Survey 2021 retains legal property rights. It is not a warranty of accuracy.

© Ordnance Survey 2021

Area shown represents 1:2,500 scale
 Ordnance Survey, 2021

Ordnance Survey 2021 retains legal property rights. It is not a warranty of accuracy.

Ordnance Survey 2021 retains legal property rights. It is not a warranty of accuracy.

Ordnance Survey 2021 retains legal property rights. It is not a warranty of accuracy.

Ordnance Survey 2021 retains legal property rights. It is not a warranty of accuracy.

X,Y= 725968.0,706145.5

Map Series | Map Sheets
 1:2,500 | 3789-B
 1:2,500 | 3789-A
 1:2,500 | 3789-C
 1:2,500 | 3789-D

COPYRIGHT INFO:
 Purchased by:
 Client:
 From:
 CSI
 Date:
 10th August 2021
 Order no.
 90212434

ILX,LLY= 725481.0,705425.0
 URX,URY= 724455.0,705425.0
 ILX,LLY= 725481.0,706906.0
 URX,URY= 724455.0,706906.0