



County Wicklow Residential Zoned Land Tax (RZLT)

Submission Template

A: Details of person / representative / agent making submission

Name	Stephen Little & Associates Chartered Town Planners, acting on behalf of Jim Wood, Brian Wood and Johnathan Treacy.
Address	[REDACTED]
Phone No.	[REDACTED]
Email Address	[REDACTED]

If you are the landowner of the lands that are the subject of this submission, or making the submission on behalf of the landowner, please complete Part (B) of this form.

If you are not the landowner of the lands that are the subject of this submission or making the submission on behalf of the landowner, (i.e. you are a 'third party') please complete Part (C) of this form.

Please be advised that personal information will be redacted before publishing.

B: Landowner Submission

Town	Newtownmountkennedy, Co. Wicklow
Landowner name	[REDACTED]
Landowner address	[REDACTED] (include Eircode if known)
Landowner phone	[REDACTED]
Landowner email	[REDACTED]
Address of site	Lands at Garden Village, Newtownmountkennedy, Co. Wicklow (include Eircode if known)
Site description	(if address is unclear) The submission land is located approximately 1km north-east of the centre of Newtownmountkennedy town. The site is located south of the existing Garden Village housing development west of the N11 roundabout junction and is bounded to the south by greenfield lands.
Site Area	1.37Ha

Maps / information to accompany submission	Check
Have you included the required Ordnance Survey map showing the lands at an appropriate scale i.e. 1:1000 in urban areas or 1:2500 in rural area, clearly identifying the map in question?	X Two maps at Scale 1:1000 and 1:2500.
Have you included proof of ownership?	

Are you:	Check
Challenging the inclusion of certain lands on the map?	X
Challenging the date that lands are considered to be 'in scope'?	X
Requesting a change in zoning?	
Identifying additional lands that you believe should be shown on the maps?	

Grounds for your submission (please see advice at end of this document)

(you can set out grounds on this form, or attach a separate document)

Please refer to the attached file entitled '22118 Garden Village_RZLT Final 20122022' which details the grounds for this submission.

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C: Third Party Submission

Town	
Landowner name	(if known)
Landowner address	(include Eircode if known)
Landowner phone	(if known)
Landowner email	(if known)
Address of site	(include Eircode if known)
Site description	(if address is unclear)
Site Area	(if known)

Please include a map if available

Please be advised that where we cannot identify the land we may not be able to take your submission into account.

Are you:	Check
Challenging the inclusion of certain lands on the map?	
Challenging the date that lands are considered to be 'in scope'?	
Identifying additional lands that you believe should be shown on the maps?	

Grounds for your submission (please see advice at end of this document)

(you can set out grounds on this form, or attach a separate document)

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Criteria for inclusion on the map - any submission to exclude or include land should make reference to these criteria:

Land that meets the criteria for inclusion on the map, and therefore liable to the RZLT, is land that –

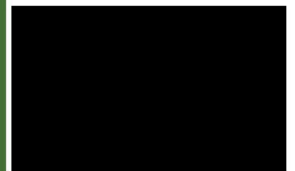
- is included in a development plan or local area plan and is zoned for residential development or zoned for a mixture of uses, that includes residential development.
- is serviced, or it is reasonable to consider may have access to services. Serviced means having access to the necessary public infrastructure and facilities including road and footpath access, public lighting, foul sewer drainage, surface water drainage and water supply necessary for dwellings to be developed and for which there is service capacity available sufficient to enable housing to be developed.
- 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 archaeological or historic remains.

but which is not –

- land that, while zoned residential, is an authorised development used to carry on a trade or profession by a business liable to pay commercial rates, and which provides services to residents of adjacent residential areas.
- land that is zoned for a mixed used purpose (including residential) unless it is reasonable to consider that such land is vacant or idle.
- land that is required for, or occupied by, other uses such as social, community or governmental infrastructure, including education and healthcare facilities, facilities used for the purposes of public administration, transport facilities and infrastructure, utilities, energy or telecommunications infrastructure and facilities; water and wastewater infrastructure and facilities, waste management and disposal infrastructure, recreational infrastructure including sports facilities and playgrounds.
- land that is subject to a statutory designation that may preclude development.
- land in respect of which the Derelict Sites Levy is payable.

Submission on
Wicklow
County Council
Residential
Zoned Land
Tax Draft Maps

At Garden Village,
Newtownmount
Kennedy, Co.
Wicklow




DECEMBER 2022

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Document Control: -

Author	Checked by	Purpose	Date
CS	EMP	Draft	15.12.2022
CS		Final	20.12.2022

1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361, make this submission on behalf of our Client, [REDACTED], [REDACTED] in response to the published Residential Zoned Land Tax (RZLT) Draft Map for Wicklow County Council, currently on public display until January 1st 2023.

The submission relates to our Client lands at Garden Village, Newtownmountkenny. The submission is accompanied by two OS maps at 1:1000 and 1:2500 identifying the Client's lands in red.

By reference to the RZLT Draft Map available online, these lands are identified in one Parcel as follows:-

Parcel ID: WW1324

Zone Original: MU – Mixed Use

Zone Generalised Zoning Type GZT: M1

Zone Generalised Zoning Type Description: Mixed Use, general development opportunity/proposal site

Hectares: 1.24



Figure 1: Extract from WCC RZLT Draft Map, identifying Client's lands at Garden Village, Newtownmountkenny, as "mixed use" and subject of the Residential Zoned Land Tax.

The Finance Act 2021 introduces the taxation measure to activate land which is suitably zoned and connected to, or has access to services for the provision of housing.

Our client is opposed to the inappropriate inclusion of its lands at Garden Village on the Council's Residential Zoned Tax (RZLT) Draft Map, as these lands are not identified in the statutory land use zoning map for residential development or mixed use development that includes residential use. Furthermore the land is not currently developable due to lack of appropriate road and waste water infrastructure to support development.

We confirm that we have carefully considered the Council's RZLT Draft Map and the '*Residential Zoned Land Tax – Guidelines for Planning Authorities*' (June 2022) prior to preparing this formal submission.

We would respectfully request that Wicklow County Council (WCC) omits the submission lands from the RZLT map, having regard to the content of this submission.

2 SUBMISSION LANDS

The submission site is located approximately 1km north-east of the centre of Newtownmountkennedy town. In 1990 the town was by-passed by the N11, separating the existing Garden Village housing development from the town proper and isolating it from the town's services. The nearest shop is located within the petrol filling station, located c.350m to the south-west on the other side of the N11.

The site is located south of the existing Garden Village housing development, west of the N11 roundabout junction and is bounded to the south by greenfield lands zoned for open space and employment use as part of a designated Action Area Plan (AP2) in the detailed Newtownmountkennedy plan, which is one of the 'Self Sustaining Town Plans (Level 4)' contained in the Wicklow County Development Plan 2022-2028.

The Newtownmountkennedy Plan includes a land use map, which identifies the statutory land use zoning for the submission lands and immediately surrounding lands at Garden Village.

We refer the Planning Authority to the accompanying Ordnance Survey Map, prepared by PD Lane Associates, which outlines the lands controlled by our Client and included on the RZLT draft map in red.



Figure 2: OSi Map extract identifying the site in red. Source: OSi based PD Lane Map

3 LEGISLATIVE CONTEXT

3.1 Residential Land Use Zoning & Connection to Services

Within recently published government guidelines entitled, 'Residential Zoned Land Tax - Guidelines for Planning Authorities June 2022', it is noted that,

*"To satisfy the criteria as identified in section 653B, land **must be zoned residential use or for mixed uses including residential** within a Development Plan, Strategic Development Zone Planning Scheme or a Local Area Plan. This can include lands which are identified solely or primarily for residential purposes within a zoning matrix and mixed use zonings where residential developments are permitted in principle.*

*In addition, **the land must be connected to, or have access to public infrastructure and facilities necessary for dwellings to be developed and with sufficient service capacity available for such development.** All lands which fulfil the criteria set out within the provisions of the legislation, whether privately or publicly owned are considered to be in scope. All residential and mixed use zonings within each Planning Authority administrative area, whether in cities and suburbs, towns and village or other settlements should be considered for the purpose of the tax."*

Under **Section 653B** of the RZLT introduced by the Finance Act 2021, reference to land which satisfies the relevant criteria for inclusion on the Draft RZLT Maps is set out. The following text is highlighted in bold where those criteria are of significance to the submission lands at Garden Village.

Section 653B criteria:—

*(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 provide 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 .

We refer to Section 4 below for confirmation regarding land use zoning, connection to public infrastructure and the facilities, or lack thereof, necessary to support residential development at the submission lands.

4 RATIONALE FOR EXCLUSION OF SUBMISSION LANDS FROM RZLT DRAFT MAP

Having regard to Section 653(B) of the Finance Act 2021 and Appendix 5 of the Guidelines, we proceed to assess the submission lands against the relevant scoping out criteria.

Appendix 5 of the RZLT Guidelines identifies the relevant steps for determining whether the ‘mixed use’ submission lands can be scoped in or out, having regard to the criteria established by the Finance Act 2021.

Appendix 5. Assessment checklist for land in scope – mixed use

Mixed Use, including residential use zoned land area			
Step 1	Is Residential Permitted in Principle	Yes - Move to Step 2	No - Out of Scope
<i>Note: Only land considered ‘vacant or idle’ is to be identified and considered.</i>			
Step 2 (see S.653B(c)(ii) and 653A(1))	Is the land ‘vacant’ or ‘idle’?		
Step 2(1)	Is a trade or profession being carried out on the land or adjacent land	Yes – move to Step 2(2)	No – retain land in scope and move to Step 3
Step 2(2)	Is the development on the land integral to the operation of the trade or profession	Yes – move to Step 2(3)	No – retain land in scope and move to Step 3
Step 2(3)	Consider if the development is not unauthorised development	Yes, the development is not considered unauthorised development	No, the use is considered unauthorised development – retain land in scope and move to Step 3
		If yes is answered to all 3 parts of Step 2, the relevant area of land is out of scope. Omit and move any remaining land to Step 3.	If no is answered to any of the 3 parts of Step 2, retain the land in scope and move to Step 3.
Step 3 (see S.653B(b))	Is the land connected to or able to be connected to services		
i)	Road Infrastructure	Yes – move to step ii)	No – Out of Scope
ii)	Footpaths	Yes – move to step iii)	No – Out of Scope
iii)	Public Lighting	Yes – move to step iv)	No – Out of Scope
iv)	Surface Water	Yes – move to step v)	No – Out of Scope
v)	Waste Water	Yes – move to step vi)	No – Out of Scope
vi)	Water Supply	Yes – move to next step	No – Out of Scope
Stage 1		All yes responses? Land is in scope – move on to Exclusions	Any no responses? Land is out of scope. Do not place on maps

Exclusions for Mixed Use, including residential use Zoned Land

Step 4 (see S.653B(c)(3))	Is the land in the Section 22 EPA Register maintained by Local Authorities?	Yes- Brownfield If the land has been subject to previous development, it is reasonable to consider that significant archaeology can be screened out.	No – retain land in scope and move to next item
	Is the land identified on the RMP	Yes- If brownfield retain in scope, if greenfield the area of the mapped RMP and zone of notification is out of scope. Omit area and move to next item.	No – retain land in scope and move to step 4

Step 5 (see S.653B(c)(3)(iii))	Is the land identified on a statutory land use plan as being required for, or is integral to, occupation by:		
I)	Social, community, governmental, public administration, education and healthcare infrastructure and facilities	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to next item.
II)	Transport facilities and infrastructure	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to next item.
III)	Energy infrastructure and facilities	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to item.
IV)	Telecoms infrastructure and facilities	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to item.
V)	Water and wastewater infrastructure and facilities	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to item.
VI)	Waste management and disposal infrastructure	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to item.
VII)	Recreational infrastructure, playgrounds, sports facilities	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to step 6
		If yes is answered to any parts of Step 5, the relevant area of land is out of scope. Omit and move any remaining land area to Step 6.	If no is answered to all parts of Step 5, the relevant land is in scope. Move to step 6.
Step 6	Is the land subject to a statutory designation which may preclude development?	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and move to step 7
Step 7	Is the land subject to the Derelict Site Levy?	Yes – the area identified is out of scope, omit area and move to next item.	No – retain land in scope and place on map.
Exclusions Conclusion		If land remains after the exclusions have been applied, then map the remaining land as being in scope.	If no has been answered to all parts of Step 3 – 7, then the whole of the land parcel is in scope and should be mapped.

Figure 3: Extract from Appendix 5 (Mixed Use) - ‘Residential Zoned Land Tax - Guidelines for Planning Authorities’ (June 2022)

4.1 Step (1) – ‘Is residential land permitted in principal?’

Section 653B (a)(ii) of the Act identifies that to be scoped in land must be zoned to allow for residential use.

In the Wicklow County Development Plan 2022-2028, the lands are subject of land use zoning set down in the ‘Self Sustaining Town Plans (Level 4)’ that sets out a detailed plan for Newtownmountkennedy, including a land use map. The submission lands are then contained within the Action Area 2 Garden Village plan (AA2 - see Figure 2) of the Newtownmountkennedy Plan.

It is an objective of this Action Area plan to provide a new neighbourhood centre to serve the existing Garden Village houses to the north and a significant new employment and open space area to the south. To this end, the submission lands are zoned ‘*MU- Mixed Use*’ – “*To provide for mixed use development*”. The nature of the mixed use for this area is specified in the plan as:

- “The neighbourhood centre not exceeding 2-storeys in height and 1,000 sq m in gross floor area shall be provided. This neighbourhood centre shall provide a range of neighbourhood services, including retail, services and community facilities. The total retail floor space shall not exceed 500 sq m and one unit may extend to 250sqm (max) with the remaining space being occupied by a number of smaller retail units (none of which shall exceed 100sqm). Non-retail services (e.g. cafes, banks, solicitors, estate agents, surgeries, etc) and community facilities (e.g. creches, meeting rooms, remote working hub) shall be provided in the remainder.
- Land not required in the Mixed Use zone for the building and associated car parking shall be laid out as public open space, including the provision of a 0.1ha equipped playground, alternatively this playground may be provided in the park area.”

The inclusion of residential use as part of the ‘mixed use’ land use objective is not specified in the statutory land use zoning objective or identified as an appropriate use for this site in the Action Plan.

As residential use is not permitted in principle at the submission lands, they should be excluded (scoped out) from Wicklow County Council’s RZLT Map.

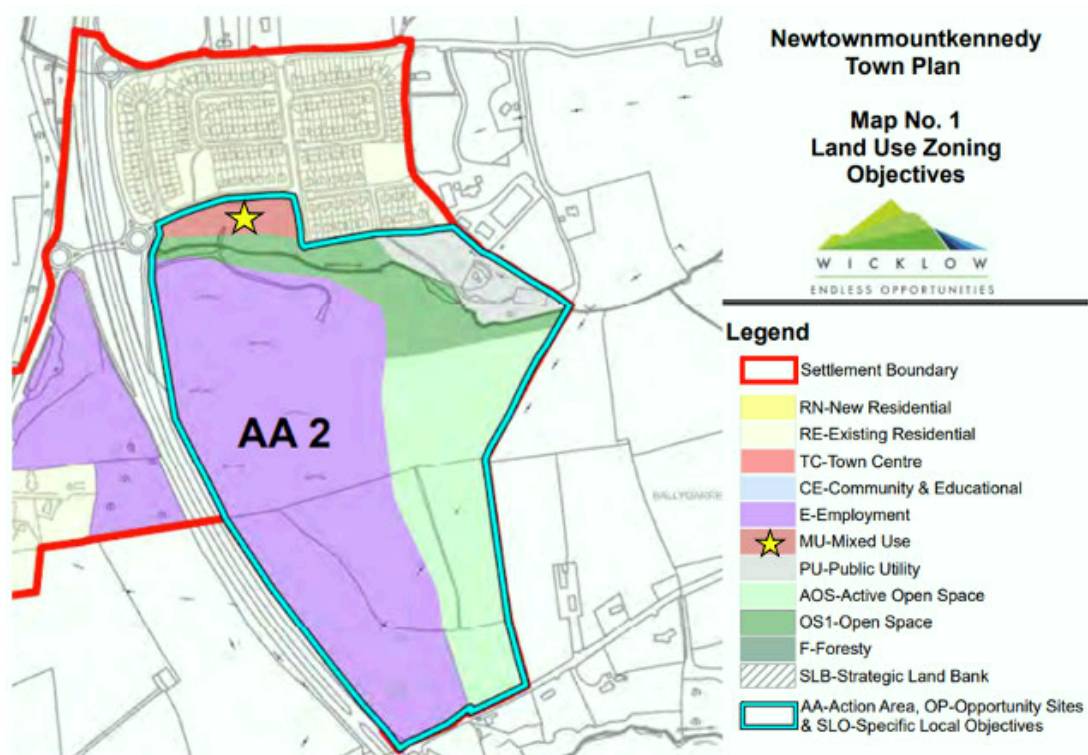


Figure 4: Submission site indicated with yellow star (Overlay by SLA), subject of ‘mixed use’ zoning that does not provide for residential use in principle. Source: Extract from Newtownmountkenny Town Plan 2022-2028.

4.2 Step 2 – ‘Is the land vacant or idle?’

The submission lands are not developed and therefore cannot be deemed to be ‘vacant or idle’, having regard to the definition provided in the Finance Act 2021 as:

“‘vacant or idle land’ means land which, 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 not required for, or integral to, the operation of a trade or profession being carried out on, or adjacent to, the land.”

This is not a relevant scoping out criterion.

4.3 Step 3 – “Is the land connected or able to be connected to services?”

Section 653B(b) of Part 22A of the Finance Act 2021, identified that for land to be scoped in:

“(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.”

4.3.1 Step 3(i) – Road Infrastructure

The Guidelines state:

*“In considering road access, the Planning Authority must take into account the **ease of access** to existing road infrastructure by identified lands. Construction of significant sections of new road access across other landholdings, should be discounted with the exception of Local Authority owned lands, where use and access are a matter for the authority.”*

In respect of the submission lands, there are no existing roads on site. In February 2022, Wicklow County Council identified a very high level indicative alignment for a new distributor link road through the AA2 lands, that would serve the submission lands and other stakeholders’ lands within the AAP. These ‘**significant works**’ would be required to connect the lands to the local road network, which are beyond the control of our client.

No further confirmation has been received from Wicklow County Council since February 2022 on the proposed route alignment and road design that would allow our Client proceed to develop their lands.

It follows that Step 3(ii) footpaths and Step 3(ii) public lighting are also not in place as of 1 January 2022.

The Planning Authority has not provided a report confirming how the relevant ‘scoping in’ criteria under Step 3 (i-iii) are met for the submission lands, including confirmation that there is sufficient capacity available for the development of the submission lands and that there would be no *significant works* required to enable same to occur.

Consequently, it must be concluded that the submission land is **not in scope** for the RZLT map, based on these Step 3 criteria.

4.3.2 Step 3(iv to vi) – Water and Drainage Infrastructure

The Guidelines state:

*“For the purpose of inclusion on the draft or supplemental, and final map, the land **must have access to or be connected to relevant services**. This includes lands which already have made connections to services, or where provision has been made in existing infrastructure for connection to the land.”*

It further clarifies that:

*“For lands which do not have the benefit of planning permission, **the ease of connecting to the existing network should be a determining factor**. Connections which can be made by directly connecting to infrastructure which is on, or adjacent to the land in question will result in lands being scoped in. Connections which **would require more significant works should consider whether the land is in the control of the applicant** or the local authority subject to considerations set out in the explanatory section”.*

The subject lands have not been developed to date as there has been significant delay in securing the upgrading of the **public foul sewer drainage system**, to include a pumping station, by Wicklow County Council. The proposed replacement of the existing temporary treatment plant at Garden Village with a new pumping station and public mains connection, outline details of which were circulated to our client

by Wicklow County Council on 8th February 2022, are considered to constitute ‘significant works’ that would be required to facilitate mixed use development at our Client’s lands. The design and implementation of such works are beyond the control of our Client.

The Planning Authority has not provided a report confirming how the relevant ‘scoping in’ criteria under Step 3 (iv-vi) are met for the submission lands, including confirmation that there is sufficient capacity available in the existing or planned public foul water drainage and treatment system, necessary to support the development of the submission lands. It has not confirmed that there would be no *significant works* required to enable same to occur.

Consequently, it must be concluded that the submission land is **not in scope** for the RZLT map, based on these Step 3 criteria.

4.4 Step 5 – Is the land required for or integral to (i) social and community infrastructure and facilities

We would take this opportunity to remind Wicklow County Council that the submission lands were originally zoned outside the Action Area Plan, and considered appropriate for a local neighbourhood centre that would serve and complete the existing Garden Village housing development. Our Client did not ever request that the lands be included within the AAP2 area designation in the Newtownmountkennedy Plan.

The mixed use zoning that now applies to our Client’s lands must now be interpreted as promoting a modest commercial / community development that would support the existing Garden Village housing. It does not however provide for residential development at the submission lands.

Given its somewhat isolated location, c.2km from Newtownmountkennedy centre, and there being no immediate prospect for the development of the employment land to the south of the submission lands, a small commercial retail unit, modest office / remote working hub and potentially a children’s playground, is considered appropriate for the site, which would support the Garden Village housing (c.200no.) immediately to the north.

The local neighbourhood centre development to support the housing has not yet been progressed to planning due to delays with the foul sewer infrastructure upgrade works, which is outside the control of our Client.

The submission lands must therefore be excluded / scoped out for reason of meeting the Step 5(i) criterion, and noting that the land use zoning for the submission lands does not allow for residential use, rather provides for supporting neighbourhood centre uses that would support the existing Garden Village housing.

5 CONCLUSION AND REQUEST TO EXCLUDE THE SUBMISSION LANDS FROM THE RZLT DRAFT MAP

Having regard to all of the above, including Appendix 5 of ‘Residential Zoned Land Tax - Guidelines for Planning Authorities June 2022’ (Figure 3) for mixed use land, the most pertinent consideration is that residential use is not acceptable in principle under this land use zoning at this site.

The submission lands therefore **fail to pass Step 1 and should be scoped out.**

Thereafter, it may or may not be relevant to further consider Steps 3 and 5.

Step 3 requires that the land is connected to or is able to be connected to services, including road infrastructure, footpaths, public lighting, surface water, waste water and water supply. There is no evidence that this infrastructure is in place or capable of being put in place, as of 1 January 2022. We respectfully submit therefore that the Planning Authority must consider the lands in question to be **‘not in scope’**.

Step 5 requires the scoping out of lands required for community development integral to supporting residential development. The submission lands are zoned for a local neighbourhood centre (mixed use) that does not allow for residential use in principle, in order to support existing neighbouring housing at Garden Village. We respectfully submit that the Planning Authority must exclude the lands in question from the RZLT map.

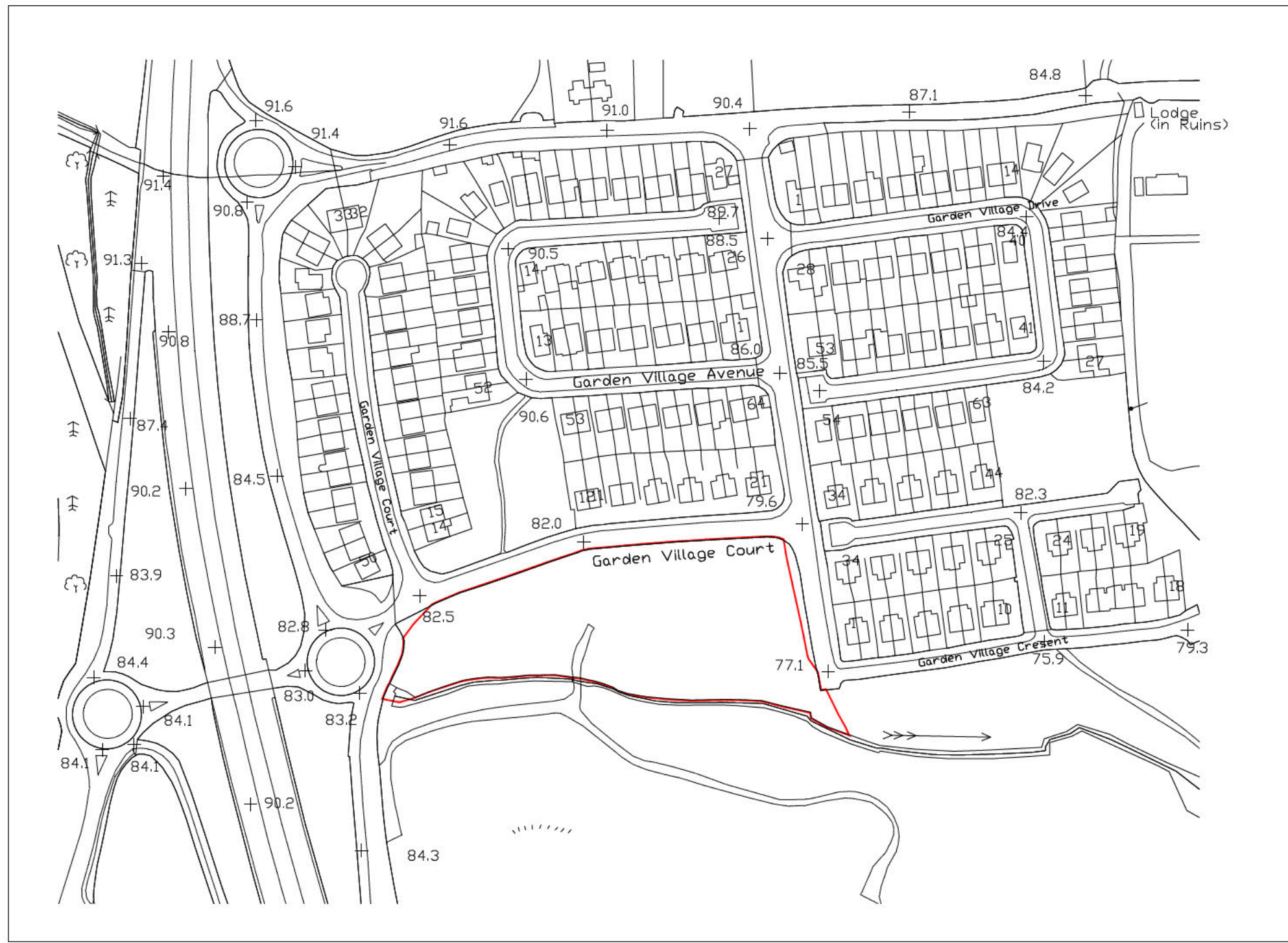
Overall, based on its lack of provision for residential use in the land use zoning for this site, the mixed use zoning that promotes the development of a local neighbourhood centre to support existing neighbouring housing, and the need for significant works to connect the lands to road and waste water infrastructure, the submission land is **not in scope and must be omitted from the Council's RZLT map**.

We trust that this submission is in order and we look forward confirmation of receipt by the Planning Authority in due course.

We confirm that make this submission on behalf of [REDACTED], and we would ask that all future correspondence in relation to this submission be directed to our office.

Enclosures

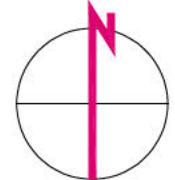
1. Ordnance Survey Map, at scale 1:1000, prepared by PD Lane Associates.
2. Ordnance Survey Map, at scale 1:2500, prepared by PD Lane Associates.



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 SURVEY DATE = 01-Nov-1997
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 ULX,ULY = 726658,707530
 URX,URY = 727240,707530
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 Projection:
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 ITM
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 ITM Centre Point Co-ordinate:
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 =====
 Extraction Date:
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 11-Feb-2016
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SITE EDGED RED ———

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GENERAL NOTES
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REVISION	DATE	DESCRIPTION
REVISION	00-00-00	DESCRIPTION

pd lane
 associates

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 Greystones F +353 1 287 0109
 Co. Wicklow E Info@pdlane.ie
 Ireland W www.pdlane.ie

architecture
 urban design
 planning
 engineering

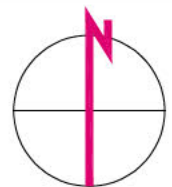
PROJECT Lands at Garden Village, Newtownmountkennedy Co. Wicklow.		DRAWING NO. W-20-34
CLIENT [REDACTED]		REVISION NO. -
DESCRIPTION Location Map		
STAGE	DATE	19-12-2022
SCALE 1 : 2500	DRAWN BY	A.C.



Output Format:
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 Output File:
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REVISION	DATE	DESCRIPTION
REVISION	00-00-00	DESCRIPTION

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PROJECT Lands at Garden Village, Newtownmountkennedy Co. Wicklow.		DRAWING NO. W-20-35
CLIENT [REDACTED]		REVISION NO. -
DESCRIPTION Location Map		
STAGE	DATE	19-12-2022
SCALE 1 : 1000	DRAWN BY	A.C.