MPC Paper No. A/K5/801A For Consideration by the Metro Planning Committee on 18.1.2019

## <u>APPLICATION FOR PERMISSION</u> <u>UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE</u>

## APPLICATION NO. A/K5/801

<u>Applicant</u>	Wing Ming Garment Factory Limited represented by AGS Consultants Limited and K&L Gates		
<u>Premises</u>	Portion of G/F including Portion of Cockloft, Wing Ming Industrial Centre, 15 Cheung Yue Street, Cheung Sha Wan, Kowloon		
<u>Floor Area of</u> <u>Premises</u>	About 428m <sup>2</sup>		
<u>Lease</u>	<ul> <li>(a) New Kowloon Inland Lot (NKIL) No. 5491</li> <li>(b) To expire on 30.6.2047</li> <li>(c) Restricted to industrial or godown purposes or both excluding offensive trades</li> </ul>		
<u>Plan</u>	Approved Cheung Sha Wan Outline Zoning Plan (OZP) No. S/K5/37		
<b>Zoning</b>	"Other Specified Uses" annotated "Business 4" ("OU(B)4)")		
	[Restricted to a maximum plot ratio (PR) of 12 and a maximum building height (BH) of 120 metres above Principal Datum, or the PR/BH of the existing building, whichever is the greater. A minimum setback of 5m from the lot boundary abutting Cheung Yee Street or Cheung Yue Street shall be provided.]		
<b>Application</b>	Proposed Shop and Services and Storage		

## 1. <u>The Proposal</u>

- 1.1 The applicant seeks planning permission to use a portion of the ground floor (G/F) and a portion of the cockloft (the Premises) of an existing industrial building (Wing Ming Industrial Centre) for proposed 'Shop and Services' and storage uses respectively. The area of the G/F portion is 304m<sup>2</sup> and the area of the cockloft portion is 124m<sup>2</sup>. The Premises falls within an area zone zoned "OU(B)4" on the approved Cheung Sha Wan OZP No. S/K5/37 (**Plan A-1**).
- 1.2 According to Schedule II of the Notes of the OZP for the "OU(B)" zone applicable to industrial or industrial-office (I-O) building, 'Shop and Services (not elsewhere specified)' use on the G/F of an industrial building requires planning permission from the Town Planning Board (the Board) whereas 'Warehouse (excluding Dangerous Goods Godown)' use is always permitted.

- 1.3 The G/F portion of the Premises was the subject of a previous application (No. A/K5/774) submitted by the same applicant for the same use which was approved by the Metro Planning Committee (the Committee) of the Board on 5.2.2016. The planning approval was subsequently revoked on 5.2.2017 since approval condition (a) in relation to the submission and implementation of fire safety measures was not complied with before the due date.
- 1.4 The plans showing the Premises submitted by the applicant is shown on **Drawings A-1** to **A-5**.
- 1.5 In support of the application, the applicant has submitted the following documents:

(a)	Application Form r	(Appendix I)			
(b)	Applicant's letter supplementary exp			1 0	(Appendix Ia)
(c)	Applicant's letter responses to public			providing	(Appendix Ib)
(d)	Applicant's lette clarifications	r dated	14.1.2019	providing	(Appendix Ic)

1.6 The application was originally scheduled for consideration by the Committee on 16.11.2018. On 16.11.2018, the Committee agreed to defer making a decision on the application for one month as requested by the applicant in order to allow sufficient time for preparation of further information. The applicant subsequently submitted further information on 11.12.2018 (**Appendix Ib**). The application has been scheduled for consideration by the Committee of the Board at this meeting.

## 2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed at **Appendices I, Ia, Ib** and **Ic**. They can be summarized as follows:

Compatibility of Use

(a) The proposed shop and services use under application is considered to be in line with the planning intention of the "OU(B)" zone for general employment use and the Town Planning Board Guidelines for Development within "OU(B)" Zone (TPB PG-No. 22D) to provide greater flexibility in the use of existing industrial buildings provided that fire safety and environmental concerns are properly addressed.

# Fire Safety Concerns

(b) The use under application does not involve the use/storage of dangerous goods. Moreover, the Premises is directly abutting onto Tai Nan West Street, and the patrons will have direct and unimpeded exit to Tai Nan West Street and Cheung Yue Street without traversing the other part of the building. Adequate fire-fighting facilities would be provided within the Premises to the satisfaction of the Fire Services Department (FSD).

## No Adverse Traffic, Environmental, Landscape and Building Structure Impacts

(c) The additional traffic generated from the use under application would be minimal and it is unlikely that the traffic generated would exceed the capacity of the local road network. Moreover, the use under application will not generate any adverse impacts on environmental, visual, landscape, and building structure.

## Genuine Need

(d) The current tenant is genuine industrialist with headquarters established in nearby building for many years. There is genuine need to provide a showroom/retail shop ancillary to their factory/godown so as to provide a thermometer to the market. Besides, the owner also receives leasing enquiries from various trades such as banks, estate agency, money exchange, etc. to provide services to the blue collars.

## No Suitable Alternative Accommodation

(e) The headquarters is frequently visited by foreign buyers. It is therefore undesirable to relocate the showroom/shop elsewhere since it is difficult for the buyers to reach the retail shop if it is located further away from headquarters, double overheads would be involved and no retail shop space is available in the vicinity. Thus there is no suitable alternative accommodation.

# No Changes in Planning Circumstances since Approval of Previous Application for Temporary Shop and Services Use (No. A/K5/625)

(f) There is no material change in planning circumstances since the previous temporary approval was granted (No. A/K5/625) or a change in the land uses of the surrounding areas. There is no adverse planning implication arising from the renewal of the planning approval.

# Lapse of Previously Approved Application (No. A/K5/699) for Shop and Services Use

(g) The applicant considered the approval condition (b) for the planning permission under application No. A/K5/699 regarding making the cockloft inaccessible from the G/F portion of the Premises unreasonable as the cockloft and the staircase are not unauthorized structures. Therefore, the applicant let the previous planning permission (No. A/K5/699) lapse. In the current application, the cockloft will be for storage use which is in line with the Government Lease and Buildings Ordinance.

Reasons for Non-compliance with Approval Conditions of Previously Approved Application (No. A/K5/774)

(h) The applicant has made its endeavors to comply with the approval conditions. The previous agent employed by the applicant did not follow up on the compliance with approval condition. Whilst the applicant subsequently hired a new agent to deal with the compliance with approval condition, the ex-tenant refused to let the contractor to enter the Premises to undertake the required fire safety installation. Thus, the applicant was unable to complete the fire safety installation on time. With the Premises recovered from the ex-tenant in September 2018, the applicant has re-submitted the current application for approval.

Legal Proceedings between the Applicant and the Incorporated Owners of Wing Ming Industrial Centre (the IO)

(i) The oppositions raised by the IO (Appendix III) are devoid of merits and the legal proceedings mentioned (paragraph 10 below) are entirely irrelevant to the current application. In essence, the proposed use under application is not an issue between the parties in all legal proceedings and the Premises is owned by the applicant.

## 3. <u>Compliance with the "Owner's Consent/Notification" Requirements</u>

The applicant is the sole "current land owner" of the Premises. Detailed information would be deposited at the meeting for Members' inspection.

# 4. <u>Town Planning Board Guidelines</u>

The Town Planning Board Guidelines for Development within "OU(B)" Zone (TPB PG-No. 22D) promulgated in September 2007 are relevant in the following aspects:

- (a) the "OU(B)" zone has been introduced to allow maximum flexibility in the use of existing industrial and I-O buildings as well as in the development of new buildings for both commercial and clean industrial uses. The planning intention of the "OU(B)" zone is primarily for general employment uses;
- (b) whilst it is the intention to provide greater flexibility in the use of the existing industrial or I-O buildings before such buildings are redeveloped, it is necessary to ensure that the fire safety and environmental concerns are properly addressed. In view of the possible presence of existing polluting and hazardous industrial uses, it is necessary to ensure compatibility of the uses within the same building until the whole building is modified/converted to accommodate the new non-polluting and less fire hazard-prone uses;
- (c) the FSD should be satisfied on the risks likely to arise or increase from the proposed commercial use under application. Owing to fire safety concern, the

aggregate commercial floor areas on the G/F of an existing industrial/I-O building with and without sprinkler systems should not exceed 460m<sup>2</sup> and 230m<sup>2</sup> respectively. For any application which would result in a slight exceedance of the relevant floor area limit, the applicant has to demonstrate that the fire safety concern can be satisfactorily addressed, and each case will be considered by the Board on its own merit. The above limits on commercial floor area do not apply to uses which are ancillary to or for the purposes of supporting the industrial activities and the routine activities of the workers in the industrial or These uses include bank, fast food counter, electrical shop, local I-O building. provisions store and showroom in connection with the main industrial use. In all cases, separate means of escape should be available for the commercial FSD will not support commercial uses in the basement(s) of an portion. industrial or I-O building as the basement(s) are more susceptible to fire risk and pose more serious hazards when involved in fire; and

(d) for all new development, redevelopment, conversion and material change of use, adequate parking and loading/unloading spaces should be provided in accordance with the requirements of the Hong Kong Planning Standards and Guidelines (HKPSG), and all other statutory or non-statutory requirements of relevant Government departments must also be met.

# 5. <u>Previous Applications</u> (Plan A-2a)

- 5.1 The Premises is the subject of three planning applications (Nos. A/K5/625, A/K5/699 and A/K5/774). They were submitted by the same applicant of the current application.
- 5.2 Application No. A/K5/625 was for temporary shop and services (real estate agency) use at Unit 1, G/F and office use<sup>1</sup> at cockloft for a period of three years. The application was approved with conditions by the Committee on 19.1.2007. As the applicant had not taken any action to comply with the approval condition regarding the submission and implementation of fire service installations before the due date, the application was revoked on 19.7.2007.
- 5.3 Application No. A/K5/699 was for shop and services use at the G/F portion of the Premises. The application was approved with conditions by the Committee on 4.3.2011. As the applicant had not taken any action to comply with the approval conditions (a) regarding the submission and implementation of fire safety measures and (b) requiring making the cockloft inaccessible from the Premises before the due date, the permission had ceased to have effect.
- 5.4 Application No. A/K5/774 was for shop and services use at the G/F portion of the Premises. The application was approved with conditions by the Committee on 5.2.2016. Two applications for extension of time (EOT) for three months (until 5.11.2016) (Application No. A/K5/774-1) and for further three months

<sup>&</sup>lt;sup>1</sup> According to the applicant, the office was the regional headquarters supporting the operation of the real estate agency and clients were not allowed to visit the cockloft. According to the Schedule II of the Notes of the OZP for the "OU(B)" zone applicable to industrial or I-O building, 'Office (excluding those involving direct provision of customer services or goods)' is a Column 1 use which is always permitted.

(until 5.2.2017) (Application No. A/K5/774-3) for compliance with the approval condition in relation to the submission and implementation of fire safety measures were approved. The applicant submitted information on 26.1.2017 to comply with the approval condition, which however, was considered not complied with by FSD. The planning approval was revoked on 5.2.2017 since the approval condition in relation to the submission and implementation of fire safety measures was not complied with before the specified time.

5.5 Details of the previous applications are at **Appendix II**.

# 6. <u>Similar Applications</u>

- 6.1 Other than the three applications mentioned in paragraph 5 above which were revoked/lapsed, there is no other similar planning application for 'Shop and Services' use on the G/F of the subject industrial building.
- 6.2 Since 2001, the Committee has considered 144 planning applications for various 'Shop and Services' uses on the G/F of the industrial buildings and I-O buildings within the "OU(B)" zone in the Cheung Sha Wan Industrial/Business Area. The Committee approved 135 of these applications while rejecting 9 applications mainly for fire safety reasons.

# 7. <u>The Premises and Its Surrounding Areas</u> (Plans A-1, A-2, A-2a and photos on Plans A-3 to A-5)

- 7.1 The Premises is:
  - (a) having direct frontage to Tai Nan West Street and Cheung Yue Street;
  - (b) currently vacant; and
  - (c) there is an internal staircase linking the G/F portion to the cockloft portion within the Premises.
- 7.2 The subject industrial building has the following characteristics:
  - (a) is a 13-storey industrial building completed in 1978 and equipped with a sprinkler system; and
  - (b) is currently used for the following purposes :

Floor	Main Uses
G/F	The Premises (vacant), car parking spaces and
	loading/unloading area
Cockloft	The Premises and remaining part of the
	cockloft (vacant)
Upper Floors	Industrial-related offices and trading firms

- 7.3 The surrounding areas have the following characteristics:
  - (a) it is an established industrial/business area in Cheung Sha Wan (which was rezoned from "Industrial" to "OU(B)" in 2001 and 2002);
  - (b) the subject building is surrounded by industrial and I-O buildings with 'Shop and Service' uses on G/F; and
  - (c) it is easily accessible by various modes of public transport with MTR Lai Chi Kok Station located within about 100m walking distance to the northwest of the subject industrial building.

## 8. <u>Planning Intention</u>

The planning intention of "OU(B)" zone is primarily for general business uses. A mix of information technology and telecommunications industries, non-polluting industrial, office and other commercial uses are always permitted in new 'business' buildings. Less fire hazard-prone office use that would not involve direct provision of customer services or goods to the general public is always permitted in existing industrial or I-O buildings.

## 9. <u>Comments from Relevant Government Departments</u>

9.1 The following Government departments have been consulted and their views on the application are summarized as follows:

## **Land Administration**

- 9.1.1 Comments of the District Lands Officer/Kowloon West, Lands Department (DLO/KW, LandsD):
  - (a) The subject premises falls within NKIL 5491 ("the Lot") which is governed under the Conditions of Sale No. 10715 as varied and/or modified by two Modification Letters dated 13.8.1975 and 5.2.1985 ("the Conditions"). The Conditions restrict the Lot to be used for industrial or godown purposes or both excluding offensive trade.
  - (b) The use under application does not comply with the Conditions. The owner of the Premises has applied to the LandsD for a temporary waiver to permit portion of G/F for shop and services uses. The waiver application is pending the approval of the planning application by the Board. However, there is no guarantee that the approval will be given. If the waiver application is approved by the LandsD acting in the capacity as

the landlord at its sole discretion, it will be subject to payment of waiver fee and imposition of other terms and conditions as may be appropriate.

## **Fire Safety**

- 9.1.2 Comments of the Director of Fire Services (D of FS):
  - (a) Wing Ming Industrial Centre is subject to a maximum permissible limit of 460m<sup>2</sup> for aggregate commercial floor area on G/F since it is protected by a sprinkler system. The area under the application (i.e. 428m<sup>2</sup>) should be counted up to the aggregate commercial floor area.
  - (b) He has no objection in principle to the application provided that:
    - (i) fire services installations and equipment are provided to his satisfaction. Detailed fire services requirements will be formulated upon receipt of formal submission of general building plans; and
    - (ii) a means of escape separated from the industrial portion is available.
  - (c) Regarding matters in relation to fire resisting construction of the Premises, the applicant should be advised to comply with the requirements as stipulated in the "Code of Practice for Fire Safety in Buildings" which is administered by the Building Authority. The applicant should also observe the "Guidance Note on Compliance with Planning Condition on Provision of Fire Safety Measures for Commercial Uses in Industrial Premises" if the application is approved.

## **Building Matters**

- 9.1.3 Comments of the Chief Building Surveyor/Kowloon, Buildings Department (CBS/K, BD):
  - (a) He has no objection in principle to the application.
  - (b) Under section 14(1) of the Buildings Ordinance (BO), no person shall commence or carry out any building works without having first obtained approval and consent from the Building Authority before commencement of works unless they are exempted under section 41 of the BO, or fall within minor works under the Building (Minor Works) Regulations.
  - (c) The applicant is advised to appoint an Authorised Person to check and ensure the followings are in compliance with the BO and its allied regulations:

- (i) adequate means of escape and fire resisting construction should be provided in accordance with the Building (Planning) Regulation (B(P)R) 41(1) and Building (Construction) Regulation 90 and the Code of Practice for Fire Safety in Buildings 2011 (FS Code);
- access and facilities for persons with a disability should be provided in accordance with B(P)R 72 and Design Manual: Barrier Free Access 2008; and
- (iii) provision of adequate sanitary fitments in accordance with Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulations.
- (d) According to the latest approved alteration and addition (A&A) plans dated 14.4.1994, the uses of G/F and cockloft portion under the application were for package room and storage respectively. The cockloft portion is linked to the G/F portion within the Premises by staircase without fire resisting separation. In other words, the G/F portion and the cockloft portion form a single fire compartment. In addition, A&A plans to the subject premises were approved on 4.10.2017. However, consent to commence the A&A works had not been granted.

# <u>Traffic</u>

- 9.1.4 Comments of the Commissioner for Transport (C for T):
  - (a) He has no in-principle objection to the application at nil provisions of car parking and loading / unloading spaces given the following observations:
    - (i) small and constrained site layout;
    - (ii) conveniently located to mass transport / public transport services; and;
    - (iii) small scale of development.
  - (b) The applicant's attention should be drawn that the C for T has the rights to impose, alter or cancel any car parking loading/unloading facilities and/or any no-stopping restrictions, on all local roads to cope with changing traffic conditions and needs. The frontage road space would not be reserved for any exclusive uses of the subject development.
- 9.2 The following Government departments have no comment on/objection to the application:

- (a) Chief Highway Engineer/Kowloon, Highways Department (CHE/K, HyD);
- (b) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (c) Chief Engineer/Mainland South, Drainage Services Department (CE/MS, DSD);
- (d) Commissioner of Police (C of P); and
- (e) District Officer (Sham Shui Po), Home Affairs Department (DO(SSP), HAD).

## 10. Public Comment Received During Statutory Publication Period

On 2.10.2018, the application was published for public inspection. During the three weeks of the statutory public inspection period, which ended on 23.10.2018, one public comment from the IO objecting to the application was received as the application may constitute a breach of the Conditions of Sales, the Deed of Mutual Covenant (DMC) and the two injunctions/judgements of the High Court. The letter of the IO is at Appendix III, and the full set of the public comment including enclosures will be deposited at the meeting for Members' inspection. According to the public comment, one of the injunctions is on user restriction that the plaintiff (i.e. the applicant) be restrained from using or permitting or suffering any of its premises in the building to be used for any purposes other than those permitted under the Special Condition (SC) (3) of the Conditions of Sale and SC (3) provides that the building shall not be used other than for "industrial or godown purposes". The other injunction is on external walls on G/F of the building that the plaintiff (i.e. the applicant) to remove and reinstate the external walls in accordance with the approved building plans dated April 1994; and on the loft over the void areas in front of car parking spaces at G/F that plaintiff (i.e. the applicant) to remove and restore the loft in accordance with the applicable building plans prior to the construction of the loft.

#### 11. Planning Considerations and Assessments

- 11.1 The applicant seeks planning permission to use a portion of the G/F and a portion of the cockloft of Wing Ming Industrial Centre for proposed 'Shop and Services' and storage uses respectively. The Premises is located within the "OU(B)4" zone which is intended primarily for general business uses. It allows greater flexibility in the use of the existing industrial or I-O buildings provided that the use would not result in adverse fire safety and environmental impacts. The proposed 'Shop and Services' and storage uses under application are considered generally in line with this planning intention.
- 11.2 The Cheung Sha Wan Industrial / Business Area is being transformed into commercial / business uses with many similar applications for 'Shop and Services' uses approved on the G/F units of other industrial and I-O buildings in the vicinity of the Premises. The proposed use under application is compatible with the changing land use character of the area. Moreover, the proposed uses are considered not incompatible with other uses of the same industrial building

which mainly comprises offices ancillary to industrial / trading firms on the upper floors.

- 11.3 The proposed 'Shop and Services' use in general complies with the Town Planning Board Guidelines for Development within "OU(B)" Zone (TPB PG-No. 22D) in that it would not induce adverse fire safety, traffic and infrastructural impacts to the development within the subject building and the adjacent areas. Relevant Government departments consulted including FSD, BD, TD, WSD, DSD and LandsD have no comments on / no objection to the application.
- 11.4 As confirmed by D of FS, the subject industrial building is equipped with a sprinkler system and subject to a maximum permissible limit of  $460m^2$  for aggregate commercial floor area on G/F in accordance with TPB PG-No.22D. If the current application is approved, the aggregate commercial floor area approved by the Committee on the G/F of the subject building will be  $428m^2$ , which is within the maximum permissible limit of  $460m^2$  as stated above.
- 11.5 The Premises is the subject of three previous applications for 'Shop and Services' use (Nos. A/K5/625, A/K5/699 and A/K5/774) which were approved with conditions by the Committee. For Application No. A/K5/625, the applicant had not taken action to comply with the approval condition. For Application No. A/K5/699, the applicant states in the current submission that the approval condition (b) to make the cockloft inaccessible from the Premises was unreasonable as the cockloft and the staircase are not unauthorized structures and hence the applicant let the previous planning permission lapse. For Application No. A/K5/774, the applicant had submitted information to comply with the approval condition in relation to the submission and implementation of fire safety measures. However, D of FS considered that the approval condition was not complied with based on the submission, and the planning approval was revoked on 5.2.2017 as the approval condition was not complied with before the due date. In this connection, sympathetic consideration could be given to the current application. With basically no change in planning circumstances, the approval of the application would be consistent with the previous decisions of the Committee on similar applications.
- 11.6 Generally, the time limit for compliance with approval conditions for application with use(s) not yet commenced operation is to submit and implement the required measure(s) 'before operation of the use'. However, given the applicant's non-compliance with approval conditions as mentioned above, a shorter compliance period is recommended for the subject application to closely monitor the progress of compliance with the approval conditions on submission and implementation of fire safety measures should the Committee decide to approve the application. The applicant should also be advised that if he fails to comply with the approval conditions again resulting in the revocation of the planning permission, sympathetic consideration may not be given to any further application.
- 11.7 There is one public comment from the IO of the subject building objecting to the application as the application may constitute a breach of the Conditions of Sales, DMC and injunctions/judgements of the court. The applicant has provided

further information that the legal proceedings mentioned in the public comment are irrelevant to the current application, and the proposed use under application is not an issue between the parties in all legal proceedings (**Appendix Ib**). Regarding the proposed uses at the Premises, DLO/KW, LandsD comments that a temporary waiver application for shop and services use of the Premises has been received and the application is pending the approval of the planning application. The issues mentioned in the public comment are non-planning related and they should be dealt with between the applicant and the IO separately and the applicant is advised to resolve the legal matters with the IO.

# 12. <u>Planning Department's Views</u>

- 12.1 Based on the assessment made in paragraph 11 and having taken into account the public comment mentioned in paragraph 10, the Planning Department has <u>no objection</u> to the application.
- 12.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until **18.1.2021**, and after the said date, the permission shall cease to have effect unless, before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are also suggested for Members' reference:

## Approval conditions

- (a) the submission of fire safety measures, including the provision of fire service installations and equipment in the application premises and a means of escape separated from the industrial portion within 3 months from the date of approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 18.4.2019;
- (b) the implementation of fire safety measures, including the provision of fire service installations and equipment in the application premises and a means of escape separated from the industrial portion within 6 months from the date of approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 18.7.2019; and
- (c) if the above planning conditions (a) or (b) is not complied with before the specified date, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice.

## Advisory clauses

The recommended advisory clauses are attached at Appendix IV.

12.3 There is no strong planning reason to recommend rejection of the application.

## 13. Decision Sought

- 13.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 13.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 13.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reasons for rejection should be given to the applicant.

## 14. Attachments

Appendix I Appendix Ie	Application form received on 18.9.2018 Letter from the applicant dated 19.10.2018
Appendix Ia	11
Appendix Ib	Letter from the applicant dated 11.12.2018
Appendix Ic	Letter from the applicant dated 14.1.2019
Appendix II	Previous Applications
Appendix III	Public Comment
Appendix IV	Recommended Advisory Clauses
Drawing A-1	Location Plan submitted by the Applicant
Drawings A-2 to A-5	Ground Floor Plans submitted by the Applicant
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-2a	Ground Floor Plan
Plans A-3 to A-5	Site Photos

PLANNING DEPARTMENT JANUARY 2019