

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/YL-KTN/645

<u>Applicant</u>	: Mr. Tang Wai-Ip
<u>Site</u>	: Lot 1117 in D.D.107, Fung Kat Heung, Kam Tin, Yuen Long
<u>Site Area</u>	: 272.8m ²
<u>Lease</u>	: Block Government Lease (demised for agricultural use)
<u>Plan</u>	: Approved Kam Tin North Outline Zoning Plan No. S/YL-KTN/9
<u>Zoning</u>	: “Agriculture” (“AGR”)
<u>Application</u>	: Proposed Temporary Animal Boarding Establishment for a Period of 3 Years

1. The Proposal

- 1.1 The applicant seeks planning permission to use the application site (the Site) for proposed temporary animal boarding establishment for a period of 3 years. According to the Notes of the OZP, ‘Animal Boarding Establishment’ is a Column 2 use in “AGR” zone which requires planning permission from the Town Planning Board (the Board). The Site is partly used for plant nursey and partly vacant with hard paving (**Plans A-2 to A-4b**). The Site is not subject to any previous application.
- 1.2 According to the applicant, the proposed development involves three one to two-storey structures with a building height ranging from 3.5m to 5.7m and a total floor area of 122.81m² for animal boarding establishment, site office and open shed uses. The applicant stated that the Site will be fenced with steel sheets and the structure for animal boarding establishment will be enclosed with soundproofing and heat-insulating material with 24-hour air conditioning and ventilation. The business hours are from 9 a.m. to 6 p.m. daily including public holidays with overnight animal boarding services. There will be not more than 12 dogs in the Site. Not more than 2 dogs will be allowed outdoor with staff

supervision at the same time during the business hours. The dogs will be kept indoor after business hours. No public announcement system and whistle blowing will be used at the Site. Septic tank will be provided at the Site. The Site is accessible via a local track from Castle Peak Road-Tam Mi. One car parking space and 1 loading/unloading space for light goods vehicle will be provided within the Site. The site layout plan and access plan submitted by the applicant are at **Drawings A-1 and A-2**.

1.3 In support of the application, the applicant has submitted the following documents:

- (a) Application form with supplementary planning statement and plans received on 19.2.2019 **(Appendix I)**
- (b) Further Information (FI) received on 25.3.2019 providing response to departmental comments **(Appendix Ia)**
- (c) FI received on 4.4.2019 providing response to departmental comments **(Appendix Ib)**

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in supplementary planning statement and FI in **Appendices I to Ib**. They can be summarized as follows:

- (a) The proposed development is temporary in nature and no permanent structure will be erected on Site. It will not jeopardize the planning intention in long term. Several applications for animal boarding establishments have been approved in the vicinity of the Site.
- (b) The provision of boundary fencing and enclosed structures at the Site will minimize adverse impact on surrounding area as well as external simulation to the dogs. The proposed drainage facilities will be properly maintained and cleaned up regularly to reduce nuisance. The proposed septic tank will follow the requirements of relevant departments with the intention to reduce any pollution to the surrounding area. Trees will also be planted within the Site and be maintained in good condition. The Site will be reinstated after the planning permission expires.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicant is not a “current land owner” but has complied with the requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under section 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) by posting site notice and sending notification letter to the

Kam Tin Rural Committee by registered mail. Detailed information would be deposited at the meeting for Members' inspection.

4. **Background**

The filling of land (hard paving) on the Site would be subject to planning enforcement action.

5. **Previous Application**

There is no previous application at the Site.

6. **Similar Applications**

- 6.1 There are 25 similar applications for temporary animal boarding establishment (No. A/YL-KTN/156, 232, 251, 253, 304, 308, 324, 377, 410, 478, 489, 519, 543, 556, 562, 577, 588, 590, 605, 616, 617, 623, 638, 639 and 642) within the same "AGR" zone on the OZP. Except application No. A/YL-KTN/156 which was rejected by the Committee on 8.11.2002, the remaining 24 applications were approved with conditions by the Committee for 2 to 5 years from 2005 to 2019. Details of these applications are summarized in **Appendix II** while their locations are shown on **Plan A-1**.
- 6.2 Application No. A/YL-KTN/156 for proposed dog kennel for a period of 3 years was rejected by the Committee on 8.11.2002 on the ground that the proposed development was not in line with the planning intention of the "AGR" zone; not compatible with the adjacent residential dwellings which would be susceptible to adverse environmental nuisances and Director of Environmental Protection did not support the application as noise nuisances would be imposed to nearby residents; and there was no information in the submission to demonstrate that the proposed development would not cause adverse environmental and drainage impacts on the surrounding areas.
- 6.3 Seven applications (No. A/YL-KTN/232, 251, 304, 377, 410, 489 and 639) at a site to the south of the Site were approved with conditions by the Committee for 2 or 3 years on 29.7.2005, 7.7.2006, 19.9.2008, 30.3.2012, 17.1.2014, 5.2.2016 and 1.2.2019 respectively for similar reasons that temporary developments would not frustrate the long-term planning intention of the "AGR" zone; not incompatible with the surrounding land uses; the developments would mainly involve existing on-site structures for animal boarding and would maintain the rural character of the site; previous approvals were granted and the applicant had made effort to comply with the approval conditions; and the relevant government departments had no adverse comments on the developments. Given that there were residential dwellings in the vicinity, temporary approval for 2 or 3 years were granted for all the applications in order to monitor the situation on

the site. However, applications No. A/YL-KTN/232, 304, 377 and 410 were revoked on 29.1.2006, 19.3.2010, 30.9.2012 and 17.7.2014 respectively due to non-compliance with approval conditions.

- 6.4 Another 3 applications No. A/YL-KTN/253, 308 and 324 at another site were approved with conditions by the Committee on 4.8.2006, 5.9.2008 and 22.5.2009 respectively for a period of 3 years for the reasons that the developments were not incompatible with the surrounding land uses; the developments would mainly involve existing on-site structures; would not cause significant impact on the existing environment and landscape; and there were no adverse departmental comments and local objection to the application. Applications No. A/YL-KTN/308 and 324 were revoked on 5.3.2009 and 22.5.2011 respectively due to non-compliance with approval conditions.
- 6.5 The remaining 14 applications (No. A/YL-KTN/478, 519, 543, 556, 562, 577, 588, 590, 605, 616, 617, 623, 638 and 642) were approved with conditions by the Committee between 2015 and 2019 for a period of 3 years or 5 years (for A/YL-KTN/638 only) on similar considerations that temporary developments would not frustrate the long-term planning intention of the “AGR” zone; and the developments were not incompatible with the surrounding land uses. Applications No. A/YL-KTN/478, 543, 588 and 590 were revoked on 6.5.2016, 23.12.2017 and 16.9.2018 (for both Nos. 588 and 590) respectively due to non-compliance with approval conditions.

7. The Site and Its Surrounding Areas (Plans A-1 to A-4b)

7.1 The Site is:

- (a) currently used for plant nursey in the northern part and vacant with hard paving in the southern part; and
- (b) accessible to Castle Peak Road-Tam Mi via a local track (**Plan A-2**).

7.2 The surrounding land uses are rural in character with a mixture of residential dwellings/structures, plant nurseries, cultivated/fallow agricultural land, farm, storage/open storage yards, and vacant/unused land. The storage/open storage yards are suspected unauthorized developments subject to enforcement action by the planning Authority:

- (a) to its immediate north is cultivated agricultural land, to its further north are residential structures/dwellings, open storage/storage yards and unused land;
- (b) to its east are plant nursey, residential dwellings/structures (the nearest about 5m away) and fallow agricultural land;

- (c) to its immediate south is a vacant land with a planning approval for temporary animal boarding establishment (No. A/YL-KTN/642). Further south are a plant nursery, fallow agricultural land, a farm, residential dwellings/structures and unused/vacant land; and
- (d) to its west are open storage yard and vacant/unused land.

8. Planning Intention

The planning intention of the “AGR” zone is primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes.

9. Comments from Relevant Government Departments

- 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/Yuen Long, Lands Department (DLO/YL, LandsD):

- (a) The Site comprises an Old Schedule Agricultural Lot held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government.
- (b) The Site is accessible from Castle Peak Road – Tam Mi via Government Land (GL) and private land. His office provides no maintenance work for the GL involved and does not guarantee any right-of-way over the GL to the Site.
- (c) The Site falls within Shek Kong Airfield Height Restriction Area (SKAHRA). The height of the proposed structures shall not exceed the relevant airfield height limit within SKAHRA.
- (d) Should planning approval be given to the planning application, the lot owner(s) will need to apply to his office to permit the structures to be erected or regularize any irregularities on site, if any. Besides, given the proposed use is temporary in nature, only application for regularization or erection of temporary structure(s) will be considered. No construction of New Territories Excepted Building(s) will be considered or allowed. Applications for any of the above will be considered by LandsD

acting in the capacity as landlord or lessor at its sole discretion and there is no guarantee that such application will be approved. If such application(s) is approved, it will be subject to such terms and conditions, including among others the payment of premium or fee, as may be imposed by LandsD.

Traffic

9.1.2 Comments of the Commissioner for Transport (C for T):

- (a) As the applicant stated that they are authorized by the land owner to temporary parking the car on the land outside the Site to facilitate their goods vehicle manoeuvring, he has no comment on the application from traffic engineering perspective.
- (b) Should the application be approved, approval condition on no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period should be included.
- (c) The Site is connected to the public road network via a section of a local access road which is not managed by Transport Department (TD). The land status of the local access road should be checked with the LandsD. Moreover, the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities accordingly.

9.1.3 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD):

- (a) His department does not and will not maintain any access connecting the Site and Castle Peak Road – Tam Mi, Chi Ho Road or San Tam Road (Fung Kat Heung Road is not maintained by his department).
- (b) Adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains.

Environment

9.1.4 Comments of the Director of Environmental Protection (DEP):

- (a) There was no environmental complaint concerning the Site received in the past 3 years.

- (b) According to the information provided by the applicant, all dogs will stay in the structure for animal boarding establishment from 6pm to 9am. The structure will be enclosed by soundproofing materials with provision of 24-hour mechanical ventilation and air-conditioning (MVAC) system. No public announcement system and whistle blowing will be allowed at the Site. In addition, the proposed septic tank and soakaway system will follow the requirements of the Practice Note for Professional Person (ProPECC) PN 5/93 "Drainage Plans subject to Comment by the Environmental Protection Department".
- (c) Based on the information provided, the applicant is advised to properly design and maintain the facilities and follow the relevant mitigation measures and requirements in the revised "Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites" to minimize any potential environmental nuisance. Suitable mitigation measures should also be implemented to minimize potential odour nuisance.
- (d) Moreover, effluent discharges from the proposed use are subject to control under the Water Pollution Control Ordinance (WPCO). A discharge licence under the WPCO shall be obtained before a new discharge is commenced.

Landscape

9.1.5 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

- (a) He has no objection to the application from landscape planning point of view.
- (b) According to the aerial photo of 2018, the surrounding area is comprised of temporary structures, carpark, farmland and scattered tree groups. The proposed use is considered not incompatible with the existing landscapes setting in proximity.
- (c) According to the site visit conducted on 7.3.2019, the Site was fenced off with temporary structures erected. No existing trees were found within the Site. Further adverse landscape impact arising from the proposed use is not anticipated.
- (d) In consideration that there is inadequate space for meaningful landscape within the Site, landscape condition is not recommended should the application be approved by the Board.

Agriculture

9.1.6 Comments of the Director of Agriculture, Fisheries and Conservation (DAFC):

- (a) Upon site inspection, active agricultural activities are found in the vicinity and agricultural infrastructures are available. The Site can be used for agricultural activities such as greenhouses, plant nurseries, etc. As the Site processes potential for agricultural rehabilitation, the application is not supported from agricultural point of view.
- (b) The subject address does not associate with any license granted by his department, nor he has received any application regarding this address. Should the application be approved, the applicant is reminded that under the current legislation, any person who provides food and accommodation for animals in return for a fee paid by the owner must apply for a Boarding Establishment License from his department.

Drainage

9.1.7 Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD):

- (a) He has no objection in-principle to the proposed development from the public drainage point of view.
- (b) Should the application be approved, approval conditions requiring the submission, implementation and maintenance of a drainage proposal for the development should be included in the planning permission.

Fire Safety

9.1.8 Comments of the Director of Fire Services (D of FS):

- (a) He has no objection in-principle to the proposal subject to fire service installations (FSIs) being provided to his satisfaction.
- (b) In consideration of the design/nature of the proposal, FSIs are anticipated to be required. Therefore, the applicant is advised to submit relevant layout plans incorporated with the proposed FSIs to his department for approval. The layout plans should be drawn to scale and depicted with dimensions and nature of occupancy.

The location of where the proposed FSI to be installed should be clearly marked on the layout plans.

- (c) The applicant is reminded that if the proposed structure(s) is required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.

Building Matters

9.1.9 Comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):

- (a) There is no record of approval by the Building Authority for the existing structures at the Site. He is not in a position to offer comments on their suitability for the use proposed in the application.
- (b) If the existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of the BD, they are unauthorized building works (UBW) under the BO and should not be designated for any proposed use under the application.
- (c) For UBW erected on leased land, enforcement action may be taken by the BD to effect their removal in accordance with BD's enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the Site under the BO.
- (d) Before any new building works (including containers/open sheds as temporary buildings and land filling) are to be carried out on Site, prior approval and consent of the BD should be obtained, otherwise, they are UBW. An Authorized Person (AP) should be appointed as the co-ordinator for the proposed building works in accordance with the BO.
- (e) The Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively.
- (f) If the Site does not abut on a specified street of not less than 4.5m wide, its permitted development intensity shall be determined under Regulation 19(3) of the (B(P)R) at the building plan submission stage.

Environmental Hygiene

9.1.10 Comments of the Director of Food and Environmental Hygiene (DFEH):

- (a) If any FEHD's facility is affected by the development, FEHD's prior consent must be obtained. Reprovisioning of the affected facilities by the project proponent up to the satisfaction of FEHD may be required. Besides, the project proponent should provide sufficient amount of additional recurrent cost for management and maintenance of the reprovisioned facilities to FEHD;
- (b) Proper licence/permit issued by FEHD is required if there is any food business/catering service/activities regulated by the DFEH under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public and the operation of any business should not cause any obstruction.
- (c) If the proposal involves any commercial/trading activities, its state should not as to be a nuisance or injurious or dangerous to health and surrounding environment. Also, for any waste generated from the commercial/trading activities, the applicant should handle on their own/at their expenses.
- (d) Any animal carcass/parts shall be properly wrapped or bagged before disposal.

District Officer's Comments

9.1.11 Comments of the District Officer (Yuen Long), Home Affairs Department (DO(YL), HAD):

He has not received any comments from locals upon close of consultation and he has no particular comment on the application.

9.2 The following Government department has no objection to/no comment on the application:

- (a) Commissioner of Police (C of P);
- (b) Director of Electrical and Mechanical Services (DEMS);
- (c) Project Manager (West), Civil Engineering and Development Department (PM(W), CEDD); and
- (d) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD).

10. Public Comments Received During Statutory Publication Period

On 26.2.2019, the application was published for public inspection. During the first three weeks of the statutory public inspection period, which ended on 19.3.2019, two public comments were received from individuals (**Appendices III-1 to III-2**). The commenters object to the application mainly on the grounds that the proposed use is not in line with the planning intention of “AGR” zone; the proposed development will cause adverse soil quality, sewage and traffic impact on the surrounding area; there are already some animal boarding and breeding establishments in the vicinity; there are agricultural activities nearby; the application is to legitimize brownfield operation and it is likely that breeding rather than boarding operation will be carried out at the Site.

11. Planning Considerations and Assessments

- 11.1 The application is for proposed temporary animal boarding establishment for a period of 3 years at the Site zoned “AGR”. The planning intention of the “AGR” zone is to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes, and to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes. The proposed use is not entirely in line with the planning intention of the “AGR” zone and DAFC does not support the application from the agriculture point of view as the Site possesses potential for agricultural rehabilitation. Nevertheless, the proposed animal boarding establishment is temporary in nature, approval of the application on temporary basis for a period of 3 years would not jeopardize the long-term planning intention of the “AGR” zone.
- 11.2 The proposed development comprising three one to two-storey structures with a building height ranging from 3.5m to 5.7m and a total floor area of 122.81m² is considered not incompatible with the surrounding land uses which are mixed with residential dwellings/structures, plant nurseries, cultivated/fallow agricultural land, open storage/storage yards, and vacant/unused land. There is also an approved temporary animal boarding establishment (No. A/YL-KTN/642) to the immediate south of the Site. Although there are sensitive receivers, i.e. residential structures/dwellings in the vicinity of the Site (the nearest about 5m away) (**Plan A-2**), the applicant advised that the Site will be fenced with steel sheets and all animals will be kept inside the temporary structure at night which will be enclosed by soundproofing and heat-insulating material and provided with 24-hour air condition and ventilation system, and no public announcement system and whistle blowing will be used at the Site. DEP has no adverse comment on the application.
- 11.3 Relevant departments consulted, except DAFC, have no adverse comment on the application. To minimise any possible environmental nuisance, approval conditions restricting the operation hours, outdoor animal activities and the use of public announcement system and whistle blowing are recommended in paragraph 12.2 (a) to (c) below. Any non-compliance with the approval condition will result

in revocation of the planning permission and unauthorized development on-site will be subject to enforcement action by the Planning Authority. The applicant will also be advised to adopt the latest 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites'. The technical requirements of C for T, CE/MN of DSD and D of FS could be addressed by approval conditions (d) to (i) in paragraph 12.2 below.

- 11.4 There are 25 similar applications within the same "AGR" zone. Only one application was rejected by the Committee mainly on the grounds that concerned departments including DEP did not support the application and there was no information to demonstrate the proposed development would not cause adverse environmental and drainage impacts on the surrounding areas. The other 24 similar applications were approved with conditions by the Committee from 2005 to 2019 (including application No. A/YL-KTN/642 to the immediate south of the Site) mainly on similar reasons that temporary developments would not frustrate the long-term planning intention of the "AGR" zone and the developments were not incompatible with surrounding land uses. In the current application, DEP does not raise adverse comment on the proposed development. In this regard, approval of the current application is generally in line with the Committee's previous decisions.
- 11.5 Two public comments were received during the statutory publication period objecting to the application mainly on the grounds of non-compliance with the planning intention of "AGR" zone and adverse soil quality, sewage and traffic impact on the surrounding area as set out in paragraph 10 above. In this regard, C for T and DEP have no objection to/adverse comments on the application. Also, temporary approval would not jeopardize the long-term planning intention of the "AGR" zone. The planning considerations and assessments above are also relevant.

12. Planning Department's Views

- 12.1 Based on the assessment made in paragraph 11 and having taken into account the public comments in paragraph 10 above, the Planning Department has no objection to the proposed temporary animal boarding establishment for a period of 3 years.
- 12.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid on a temporary basis for a period of 3 years until 12.4.2022. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval Conditions

- (a) no operation between 6:00p.m. and 9:00a.m. (except overnight animal boarding), as proposed by the applicant, is allowed on the Site during the planning approval period;

- (b) all animals shall be kept inside the enclosed animal boarding establishment on the Site between 6:00p.m. and 9:00a.m, as proposed by the applicant, at all times during the planning approval period;
- (c) no public announcement system, portable loud speaker, or any form of audio amplification system or whistle blowing is allowed to be used on the Site at any time during the planning approval period;
- (d) no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (e) the provision of boundary fencing within **6** months from the date of planning approval to the satisfaction of the Director of Planning or of the Town Planning Board by 12.10.2019;
- (f) the submission of drainage proposal within **6** months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by 12.10.2019;
- (g) in relation to (f) above, the implementation of drainage proposal within **9** months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by 12.1.2020;
- (h) in relation to (g) above, the implemented drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (i) the submission of fire service installations proposal within **6** months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 12.10.2019;
- (j) in relation to (i) above, the implementation of fire service installations proposal within **9** months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 12.1.2020;
- (k) if any of the above planning conditions (a), (b), (c), (d) or (h) is not complied with during the planning approval period, the approval hereby given shall cease to have effect and shall be revoked immediately without further notice;
- (l) if any of the above planning conditions (e), (f), (g), (i) or (j) is not complied with by the specified date, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice;
and

- (m) upon the expiry of the planning permission, the reinstatement of the Site to an amenity area to the satisfaction of the Director of Planning or of the Town Planning Board.

Advisory Clauses

The recommended advisory clauses are attached at **Appendix IV**.

- 12.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the proposed development is not in line with the planning intention of the "AGR" zone which is to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes. No strong justification has been given in the submission for a departure from the planning intention, even on a temporary basis.

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 period of which the permission should be valid on a temporary basis.
- 13.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

14. Attachments

- Appendix I** Application Form with supplementary planning statement and plans received on 19.2.2019
- Appendix Ia** FI received on 25.3.2019
- Appendix Ib** FI received on 4.4.2019
- Appendix II** Similar applications within the same "AGR" zone on the Kam Tin North OZP

Appendices III-1 to III-2	Public comments received during statutory publication period
Appendix IV	Advisory clauses
Drawing A-1	Site layout plan
Drawing A-2	Access plan
Plan A-1	Location plan with similar applications
Plan A-2	Site plan
Plan A-3	Aerial photo
Plans A-4a to A-4b	Site photos

**PLANNING DEPARTMENT
APRIL 2019**