

**APPLICATION FOR PERMISSION  
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE**

**APPLICATION NO. A/YL-KTS/797**

- Applicant** : Multi Link Corporation Limited represented by M & D Planning and Surveyors Consultant Limited
- Site** : Lots 1689 S.C, 1689 S.D, 1689 S.E, 1689 S.F, 1689 S.G, 1689 S.H and 1689 RP in D.D. 109 and Adjoining Government Land, Kam Tin Road, Kam Tin, Yuen Long
- Site Area** : About 1,111.95 m<sup>2</sup> (including about 195.75 m<sup>2</sup> of Government land)
- Lease** : Block Government Lease (demised for agricultural use)
- Plan** : Draft Kam Tin South Outline Zoning Plan (OZP) No. S/YL-KTS/14
- Zoning** : “Residential (Group C)” (“R(C)”) (98%)  
[Maximum plot ratio of 0.8, maximum site coverage of 40% and maximum building height of 4 storeys (12 m)]
- “Village Type Development” (“V”) (2%)  
[Maximum building height of 3 storeys (8.23m)]
- Application** : Proposed Temporary Shop and Services (Motor Vehicles Showroom) 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 shop and services (motor vehicles showroom) for a period of 3 years. The Site falls mainly within “R(C)” zone with only a minor portion within “V” zone. According to the Notes of the OZP, ‘Shop and Services’ is Column 2 use in the “R(C)” zone and “V” zone which requires planning permission from the Town Planning Board (the Board). The Site is partly used for parking of vehicles and partly occupied by a 2-storey temporary structure without valid planning permission (**Plans A-2 to A-4b**).

- 1.2 The Site is the subject of four previous applications. The last application No. A/YL-KTS/746 for the same use submitted by the same applicant as the current application was approved with conditions by the Rural and New Town Planning Committee (the Committee) on 27.10.2017. However, it was revoked on 27.7.2018 due to non-compliance of approval conditions in relation to the implementation of drainage, landscape and fire service installations (FSIs) proposals.
- 1.3 According to the applicant, the proposed use involves 4 one to two-storey structures with a total floor area of about 183.86m<sup>2</sup> and building height ranging from 2.8m to 6.9m for temporary office, storage, meeting room and shelter uses. 18 private car and 7 light goods vehicle parking spaces will be provided at the Site. The proposed development will operate from 10:30 a.m. to 6:30 p.m. on Mondays to Saturdays, and 11:30 a.m. to 6:30 p.m. on Sundays and public holidays. The applicant will provide measures to ensure that there is no conflict of traffic movement to/from the Site by providing maneuvering space, proper road marking or traffic sign, and traffic control by on-site staff. The ingress/egress of the Site is located at the north abutting Kam Tin Road (**Plan A-1a**). No heavy vehicles exceeding 5.5 tonnes will enter or exit the Site. The site layout, landscape, drainage and FSIs plans are at **Drawings A-1 to A-5**.
- 1.4 Comparing with the last application, the current application is for the same proposed use with the same layout.
- 1.5 In support of the application, the applicant has submitted the following documents:
- (a) Application Form with supplementary information (**Appendix I**) received on 24.8.2018
  - (b) Further Information (FI) received on 28.9.2018 in (**Appendix Ia**) response to departmental comments  
*(accepted and exempted from recounting and publication requirements)*
  - (c) FI received on 2.10.2018 in response to departmental (**Appendix Ib**) comments  
*(accepted and exempted from recounting and publication requirements)*
  - (d) FI received on 8.10.2018 in response to departmental (**Appendix Ic**) comments and providing clarifications  
*(accepted and exempted from recounting and publication requirements)*
  - (e) FI received on 10.10.2018 in response to (**Appendix Id**) departmental comments  
*(accepted and exempted from recounting and*

*publication requirements)*

## **2. Justifications from the Applicant**

The justifications put forth by the applicant in support of the application are detailed in the supplementary information and FIs in **Appendices I to Ic**. They are summarized as follows:

- (a) The applicant has been operating sale of vehicles in Kam Tin town centre since 1995. Due to increase in rent, the applicant has to move the showroom and office to the Site which is owned by him.
- (b) The proposed use is not incompatible with the surrounding areas. There are also planning applications in Kam Tin for motor vehicle showroom approved by the Committee in 2017.
- (c) The proposed development will mainly be used for motor vehicles showroom and meeting purposes and will serve the neighborhood in Kam Tin. It can also benefit to the employment of Kam Tin and increase other consumer group in the community. No adverse fire safety, traffic, environmental and drainage impacts are anticipated.
- (d) Previous application for the same use was approved in 2017. The applicant submits the current application because the implementation of the works for the approval conditions was not completed on time.

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

The applicant is the sole “current land owner”. Detailed information would be deposited at the meeting for Members’ inspection.

## **4. Background**

The Site is not subject to planning enforcement action. Should there be sufficient evidence to prove that the use on site is an unauthorized development under the Town Planning Ordinance, appropriate enforcement action will be taken.

## **5. Previous Applications**

- 5.1 The Site is the subject of four previous applications (No. A/DPA/YL-KTS/27, A/YL-KTS/149, 223 and 746). Details of the previous applications are summarized in **Appendix II** and the locations of the sites are shown on **Plan A-1b**.

- 5.2 Application No. A/DPA/YL-KTS/27 for residential development under the then “Undetermined” (“U”) zone<sup>1</sup> was rejected by the Committee on 8.1.1993 mainly on the grounds that the proposed development might affect the future development of the residential area in the adopted Kam Tin Layout Plan; the proposed vehicular access onto Kam Tin Road was not acceptable as it would be in conflict with the road junction opposite the Site; the proposed car parking facilities were inadequate; the proposed building height of 5 storeys was excessive and not in line with the adopted layout plan for the area and the submission did not provided information on the landscape proposal and drainage, sewage treatment and disposal facilities.
- 5.3 Application No. A/YL-KTS/149 for temporary open storage of vehicles and vehicle parts was reject by the Board on review on 21.5.1999 mainly on the grounds that the proposed development was not in line with the planning intention; there was no strong justification in the submission for a departure from the planning intention, even on a temporary basis; the proposed development was not compatible with the surrounding areas; the approval of the application would set an undesirable precedent for other similar applications; the cumulative effect of approving such similar applications would result in a general degradation of the environment of the area.
- 5.4 Application No. A/YL-KTS/223 for temporary public car park was rejected by the Committee on 8.9.2000 mainly on the grounds that the vehicular access of the proposed car park would be in conflict with the proposed pedestrian crossing and bus bay under “Kam Tin Bypass” project; the vehicular access point being located immediately adjacent to the proposed pedestrian crossing was undesirable from safety point of view and there was no information in the submission to demonstrate these technical issues could be satisfactorily resolved.
- 5.5 Application No. A/YL-KTS/746 for the same use submitted by the same applicant as the current application was approved with conditions by the Committee on 27.10.2017 mainly for the reasons that the proposed use on a temporary basis would not frustrate the long-term planning intention; the development was considered not incompatible with the surrounding areas; traffic control measures were proposed to address traffic safety concerns; no adverse departmental comments and technical concerns could be addressed by approval conditions. However, the application was revoked on 27.7.2018 due to non-compliance of approval conditions in relation to the implementation of drainage, landscape and FSIs proposals.
- 5.6 Comparing with the last application, the current application is for the same proposed use with the same layout.

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<sup>1</sup> The Site was rezoned from “U” zone to “R(C)” zone on Kam Tin South OZP No. S/YL-KTS/1 which was gazetted on 17.6.1994.

## 6. **Similar Application**

There is no similar application for temporary shop and services (motor vehicles showroom) within the same “R(C)” zone and “V” zone on the OZP.

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

7.1 The Site is:

- (a) located at the south of Kam Tin Road with direct access from the road; and
- (b) fenced, hard-paved with temporary structures and currently used as parking of vehicles without valid planning permission (**Plans A-2 and A-4b**).

7.2 The surrounding areas are rural in character predominated by residential structures/dwellings, cultivated agricultural land, vacant/unused land, open storage/storage yards, parking of vehicles, workshops, warehouses, retail shops, and youth center. Some of these uses are suspected unauthorized development subject to enforcement action taken by the Planning Authority (**Plan A-2**):

- (a) to its north across Kam Tin Road are open storage/storage yards, warehouses and workshops;
- (b) to its immediate east within the “R(C)” zone are a residential dwelling/structure, youth center and unused land;
- (c) To its immediate south is a stream and across the stream are cultivated agricultural land and sites under construction; and
- (d) to its immediate west are residential structures/dwellings, retail shops, parking of vehicles and to its further west is a temporary carpark approved under application No. A/YL-KTS/689 which is valid until 8.1.2019, a workshop and vacant land.

## 8. **Planning Intention**

The planning intention of the “R(C)” zone is primarily for low-rise, low-density residential developments where commercial uses serving the residential neighborhood may be permitted on application to the Board.

## 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 Government Land (GL) and 7 private lots, i.e. various sections and remaining portion of Lot No. 1689 in D.D. 109 which was held under New Grant No. 808 for private residential purposes.
- (b) No permission is given for occupation of GL (about 195.75m<sup>2</sup> subject to verification) included in the Site. Any occupation of GL without Government's prior approval is not allowed.
- (c) The Site is accessible to Kam Tin Road via GL. His office provides no maintenance work for the GL involved and does not guarantee any right-of-way over the GL to the Site.
- (d) 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.
- (e) Should the application be approved, the lots owner(s) will need to apply to his office if any structure to be erected or regularize any irregularities on Site, if any. Besides, given the proposed use is temporarily in nature, only application for regularization or erection of temporary structure(s) will be considered. No construction of New Territories Exempted Building(s) will be considered or allowed. Furthermore, the applicant has to either exclude the GL portion from the Site or apply for a direct grant STT for use of the Site. 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 the LandsD.

### **Traffic**

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

- (a) He has no comment on the application from traffic engineering perspective.
- (b) Should the application be approved, approval conditions on no vehicle is allowed to queue back to or reverse onto/from public road and no vehicle is allowed to make left turn from the Site to the public road at any time during the planning approval period should be included.
- (c) The applicant is reminded that sufficient space within the Site should be provided for maneuvering of vehicles.

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

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):

The applicant is advised to follow the relevant mitigation measures and requirements in the latest “Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites” issued by the DEP.

### **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 the landscape planning point of view.
- (b) The Site is located at the east fringe of Tsz Tong Tsuen next to Kam Tin Road. The surrounding is predominantly rural fringe in character with open storages and workshops, temporary structures, village houses and tree groups. The proposed use is not incompatible with the existing landscape setting.

- (c) Having compared the aerial photo dated 13.3.2018 and the photo record on 4.7.2017, the Site is still paved and no significant vegetation within the site boundary is observed in the aerial photo. Significant adverse landscape impact arising from the proposed temporary use is not expected.
- (d) Should the application be approved, the approval condition requiring submission and implementation of landscape proposal to the satisfaction of the Director of Planning or of the Board is recommended to be included in the planning permission.

### **Drainage**

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

- (a) He has no in-principle objection to the proposed development from the public drainage point of view and no adverse comment on the submitted drainage proposal. Nevertheless, the applicant should be reminded to note the following:
  - (i) The applicant should implement the drainage facilities on Site in accordance with the agreed drainage proposal.
  - (ii) The applicant is required to rectify the drainage system if they are found to be inadequate or ineffective during operation. The applicant shall also be liable for and shall indemnify claims and demands arising out of damage of nuisances caused by a failure of the drainage system.
  - (iii) The proposed development would neither obstruct overland flow nor adversely affected any existing natural streams, village drains, ditches and the adjacent areas.
  - (iv) The applicant should consult DLO/YL and seek consent from relevant lot owners for any works to be carried out outside his lot boundary before commencement of the drainage works.
- (b) Should the application be approved, the conditions requiring the implementation and maintenance of the agreed drainage proposal for the development to the satisfaction of the



Director of Drainage Services or of the Board should be included in the planning approval.

### **Building Matters**

9.1.7 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.
- (b) For unauthorized building works (UBW) erected on leased land, enforcement action may be taken by 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 Buildings Ordinance (BO).
- (c) Before any new building works (including containers/open sheds as temporary buildings) are to be carried out on the Site, prior approval and consent of the BD should be obtained, otherwise, they are UBW. An Authorized Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO.
- (d) 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.
- (e) If the Site does not abut on a specified street of not less than 4.5 m wide, its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at the building plan submission stage.

### **Nature Conservation**

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

- (a) Noting that the Site is paved and partly occupied by temporary structures, he has no comment on the application from nature conservation perspective.
- (b) Should the application be approved, the applicant is advised to implement appropriate measures to avoid causing

pollution or disturbance to the adjacent abandoned meander (81CD/11) to the south of the Site (**Plan A-2**).

### **Fire Safety**

#### 9.1.9 Comments of the Director of Fire Services (D of FS):

- (a) He has no in-principle objection to the application subject to fire service installations (FSIs) being provided to his satisfaction.
- (b) The FSIs proposal submitted by the applicant is considered acceptable. The applicant is advised that the installation/ maintenance/ modification/ repair work of FSI shall be undertaken by an Registered Fire Service Installation Contractor (RFSIC). The RFSIC shall after completion of the installation/maintenance/modification/repair work issue to the person on whose instruction the work was undertaken a certificate (FS 251) and forward a copy of the certificate to the Director of Fire Services.
- (c) The applicant is reminded that if the proposed structure(s) is required to comply with the BO (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.

### **District Officer's Comments**

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

He has not received any local's comment on the application.

#### 9.2 The following departments have no objection to or no comment on the application:

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

## **10. Public Comment Received During Statutory Publication Period**

On 31.8.2018, the application was published for public inspection. During the first three weeks of the statutory public inspection period, which ended on 21.9.2018, one public comment from an individual (**Appendix III**) was received. The commenter objects to the application mainly on the grounds that the proposed development is a long established brownfield operation which should be phased out for development of residential use; vehicle repair works involve the use of toxic materials that leach into the ground and is inappropriate for residential land; and the applicant failed to provide adequate drainage, landscape and fire services installations for the proposed car showroom.

## **11. Planning Considerations and Assessments**

- 11.1 The application is for proposed temporary shop and services (motor vehicles showroom) for a period of three years mainly within “R(C)” zone (98%) with minor portion within “V” zone (2%). The proposed use is not in line with the planning intention of the “R(C)” zone, which is primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board. Nevertheless, there is no known development programme for the subject “R(C)” site, it is considered that the proposed shop and services (motor vehicles showroom) on a temporary basis would not frustrate the long-term planning intention of the “R(C)” zone on the OZP.
- 11.2 The development is considered not incompatible with the surrounding areas which are rural in character predominated by residential structures/dwellings, open storage/storage yards, parking of vehicles, workshops, warehouses, retail shops, cultivated agricultural land and vacant/unused land.
- 11.3 In view of the nature of the proposed motor vehicles showroom and the Site is adjacent to Kam Tin Road, it is unlikely that the development would generate significant traffic impact to the nearby residential dwellings/structures. Relevant government departments consulted including DLO/YL of LandsD, DEP, CE/MN of DSD, D of FS and CTP/UD&L of PlanD have no adverse comment on the application. Possible environmental nuisance generated by the proposed use could be addressed by imposing approval conditions restricting operation hours, and prohibiting the use of medium or heavy goods vehicles and workshop activities as recommended in paragraph 12.2 (a) to (d) below. Any non-compliance with the approval conditions will result in revocation of the planning permission and unauthorized development on the Site will be subject to enforcement action by the Planning Authority. Besides, the applicant will be advised to follow the relevant mitigation measures and requirements in the latest “Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites” issued by the DEP in order to alleviate any potential impact. The technical requirements of C for T, CE/MN of DSD, CTP/UD&L of PlanD and D of FS can be addressed by

imposing the approval conditions recommended in paragraphs 12.2 (f) to (l) below.

- 11.4 The Site is the subject of four previous applications (No. A/DPA/YL-KTS/27, A/YL-KTS/149, 223 and 746). The first three applications for residential development, open storage of vehicles and public car park uses were rejected by the Committee or by the Board on review on 8.1.1993, 21.5.1999 and 8.9.2000 respectively. The last application No. A/YL-KTS/746 for the same use submitted by the same applicant as the current application was approved with conditions by the Committee on 27.10.2017. The applicant complied with approval conditions on the submission of drainage, landscape and FSIs proposals. However, it was revoked on 27.7.2018 due to non-compliance of approval conditions in relation to the implementation of drainage, landscape and FSIs proposals. In the current application, the applicant submitted the approved drainage, FSIs and landscape plans and CE/MN, DSD, D of FS and UD&L of PlanD have no adverse comment on the application. Hence, sympathetic consideration could be given to the current application. Shorter compliance periods are recommended to monitor the progress of compliance of the conditions should the Committee decide to approve the current application. Moreover, the applicant would be advised that should he fail 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.
- 11.5 One public comment objecting to the application was received during the statutory publication period as stated in paragraph 10 above. In this regards, temporary approval would not frustrate the long-term planning intention. The planning considerations and assessments above are also relevant.

## **12. Planning Department's Views**

- 12.1 Based on the assessments made in paragraph 11 and having taken into account the public comment as mentioned in paragraph 10 above, the Planning Department considers that proposed temporary shop and services (motor vehicles showroom) could be tolerated 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 19.10.2021. The following conditions of approval with shorter compliance period and advisory clauses are also suggested for Members' reference.

### **Approval Conditions**

- (a) no operation between 6:30 p.m. and 10:30 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;

- (b) no operation between 10:30 a.m. and 11:30 a.m. on Sundays and public holidays, as proposed by the applicant, is allowed on the Site during the planning approval period;
- (c) no dismantling, maintenance, repairing, cleansing, paint spraying or other workshop activities shall be carried out at the Site during the planning approval period;
- (d) no medium or heavy goods vehicles exceeding 5.5 tonnes, including container tractors/trailers, as defined in the Road Traffic Ordinance, are allowed to be parked/stored on or enter/exit the Site at any time during the planning approval period;
- (e) the existing boundary fencing on the Site shall be maintained at all times during the planning approval period;
- (f) no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (g) no vehicle is allowed to make left turn from public road to the Site or right turn from the Site to the public road at any time during the planning approval period;
- (h) the implementation of the accepted 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 19.4.2019;
- (i) in relation to (h) above, the implemented drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (j) the submission of landscape proposal within **3** months from the date of planning approval to the satisfaction of the Director of Planning or of the Town Planning Board by 19.1.2019;
- (k) in relation to (j) above, the implementation of landscape proposal within **6** months from the date of planning approval to the satisfaction of the Director of Planning or of the Town Planning Board by 19.4.2019;
- (l) the implementation of the accepted fire service installations proposal within **3** months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 19.1.2019;
- (m) if any of the above planning conditions (a), (b), (c), (d), (e), (f), (g) or (i) 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;

- (n) if any of the above planning conditions (h), (j), (k) or (l) 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
- (o) 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.

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 "R(C)" zone which is primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board. No strong planning justification has been given in the submission for departure from the planning intention of the "R(C)" zone, even on a temporary basis.

#### Advisory Clauses

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

### **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**

<b>Appendix I</b>	Application Form with supplementary information received on 24.8.2018
<b>Appendix Ia</b>	FI received on 28.9.2018 in response to departmental comments
<b>Appendix Ib</b>	FI received on 2.10.2018 in response to departmental comments

<b>Appendix Ic</b>	FI received on 8.10.2018 in response to departmental comments and providing clarifications
<b>Appendix Id</b>	FI received on 10.10.2018 in response to departmental comments
<b>Appendix II</b>	Previous applications covering the Site
<b>Appendix III</b>	Public comment received during the statutory publication period
<b>Appendix IV</b>	Advisory Clauses
<b>Drawings A-1 and A-2</b>	Site Layout Plans
<b>Drawing A-3</b>	Landscape Plan
<b>Drawing A-4</b>	Drainage Plan
<b>Drawing A-5</b>	FSIs Plan
<b>Plan A-1a</b>	Location Plan
<b>Plan A-1b</b>	Previous Application Plan
<b>Plan A-2</b>	Site Plan
<b>Plan A-3</b>	Aerial Photo
<b>Plans A-4a and A-4b</b>	Site Photos

**PLANNING DEPARTMENT  
OCTOBER 2018**