

RNTPC Paper No. A/YL-MP/286  
For Consideration by  
the Rural and New Town  
Planning Committee  
on 15.11.2019

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

**APPLICATION NO. A/YL-MP/286**

- Applicant** : Anfield Hearts Foundation Ltd. represented by Henry Ho Architects
- Site** : Ex-Koon Ying Public School site and the adjacent former school office building, Government Land (GL) in D.D. 105, Mai Po San Tsuen, Mai Po, Yuen Long, New Territories
- Site Area** : About 1,024 m<sup>2</sup>
- Land Status** : GL
- Plan** : Approved Mai Po and Fairview Park Outline Zoning Plan (OZP) No. S/YL-MP/6
- Zoning** : “Village Type Development” (“V”)
- Application** : Proposed School

**1. The Proposal**

- 1.1 The applicant seeks planning permission to use the existing vacated school buildings of the former Koon Ying Public School (which had been closed since 2006) and the adjacent former school office building at the application site (the Site) for the proposed school. The Site falls within an area zoned “V” on the OZP. According to the Notes of the OZP, ‘School’ is a Column 2 use which requires planning permission from the Town Planning Board (the Board).
- 1.2 According to the applicant, the proposed school is a primary school for children of special education needs and learning disabilities (SEND). The proposed school will provide 4 classrooms with 60 places for full day school, and will be housed within the existing buildings of the ex-Koon Ying Public School (2 one-storey classroom buildings and 1 one-storey lavatory structure) and the adjacent 2-storey former school office building (**Drawings A-1 to A-3**). The applicant states that the existing buildings will be maintained, repaired and refurnished, and no major alterations and additions would be carried out on the existing buildings except for

necessary structural repair/maintenance. The existing lavatory will be refurbished to include toilet facility for the disabled. The existing gross floor area (GFA), site coverage (SC) and building height (BH) would remain unchanged. The Site abuts and can be accessed from Castle Peak Road – Mai Po via a local track (**Plan A-2a**). The proposed school is scheduled to be completed in July 2020 tentatively. The proposed development parameters are summarised in the following table:

Development parameters	Proposed School (Application No. A/YL-MP/286) (Plan A-2b)			
	Building A	Building B	Lavatory	Staff Office
Proposed use	classrooms	function rooms (e.g. therapy room, music room etc.)	-	-
Site area	about 1,024m <sup>2</sup>			
BH	not exceeding 6.29m (9.79mPD), 1-2 storeys			
	6.29m (9.79mPD), 1 storey	5.11m (8.61mPD), 1 storey	4.1m (7.6mPD), 1 storey	6m (9.5mPD), 2 storeys
GFA	about 485m <sup>2</sup>			
	*203m <sup>2</sup>	^129m <sup>2</sup>	57m <sup>2</sup>	96m <sup>2</sup>
Plot ratio	0.4736			
SC	about 42.68%			
Maximum capacity	60 full day students			
No. of parking spaces/lay-bys	Private car parking space: 1 Private car/taxi lay-bys: 2 School bus lay-bys: 3			

\*Total GFA of Building A: 160m<sup>2</sup> (main building) + 43m<sup>2</sup> (covered verandah areas) = 203m<sup>2</sup>

^Total GFA of Building B: 112m<sup>2</sup> (main building) + 17m<sup>2</sup> (covered canopy areas) = 129m<sup>2</sup>

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

- (a) Application form received on 18.9.2019 **(Appendix I)**
- (b) Planning Statement with Traffic Impact Assessment **(Appendix Ia)**
- (c) Further Information received on 28.10.2019 providing clarification on school operation details **(Appendix Ib)**  
*(accepted and exempted from publication and recounting requirements)*

- (d) Further Information received on 31.10.2019 providing (Appendix Ic) clarification on the school operator (*accepted and exempted from publication and recounting requirements*)

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

The justifications put forth by the applicant in support of the application are detailed in the application form and planning statement in **Appendix I, Ia and Ib**. They can be summarised as follows:

- (a) The former Koon Ying School site has been used as a village school for nearly half a century despite being left vacant for another 13 years. The re-establishment of a school within the Site is compatible with the existing use and its surrounding conditions. The proposed maximum capacity of 60 students is compatible with the original school serving size and there is no change to the existing GFA, SC and BH.
- (b) The Site is one of the 50 vacant school premises returned to the Government for disposal and the Education Bureau confirmed the Site is not required for re-allocation for standard school use under the Central Clearing House mechanism. The proposed school can relieve the long term vacancy issue of the Site.
- (c) The proposed school is dedicated for children with SEND who is in need of a modified teaching programme and the former Koon Ying School site can offer specialist holistic education and therapy in a safe and caring environment. The proposed school can address the issue of insufficient provision of appropriate education for SEND students and correspond to the established Government policy for encouraging the special needs students to integrate into the local education system. None of the seven schools serving SEND students in Hong Kong are within the Northwest New Territories and the proposed school can provide specialist education for children based in the New Territories.
- (d) The operator of the proposed school, Anfield School is a charitable institution, has 20 years of experience in education and has founded their first international primary school in Tai Wai in 2011 which is also for children with SEND. The opening of a school for SEND students operated by the applicant is welcomed by the wider community of SEND students and families, and related organisations and professionals. The proposed school will adopt the National Curriculum of England.
- (e) The proposed school is supported by villagers who share the same vision to upkeep the function of the school with the proposed development after a long term vacancy at the Site.

- (f) The school encourages all students to take school buses or public transportation to and from the school. The traffic impact assessment demonstrated the projected traffic generated would not have adverse impact to key junctions in the vicinity and the internal transport provision is sufficient to cope with the anticipated loading/unloading activities and impact on the cumulative traffic is negligible.
- (g) No adverse environmental and drainage impacts are anticipated. All works would be carried out to the satisfaction of requirements of the Buildings Department (BD) and Fire Services Department. No existing trees would be felled or removed.

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

As the Site involves Government land only, the “owner’s consent/notification” requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) is not applicable to the application.

### **4. Town Planning Board Guidelines**

According to the Town Planning Board Guidelines for Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance (TPB PG-No. 12C), the Site falls within the Wetland Buffer Area (WBA). The relevant assessment criteria are summarised as follows:

- (a) the intention of the WBA is to protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area (WCA) and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds; and
- (b) within the WBA, for development or redevelopment which requires planning permission, an ecological impact assessment (EcoIA) would need to be submitted. Some local and minor uses (including school other than free-standing building exceeding 3 storeys) are however exempted from the requirement of EcoIA.

### **5. Background**

- 5.1 The Site is not the subject of any active enforcement case.
- 5.2 The Site is a vacant school premises and was previously served as Koon Ying Public School which has been closed down and left vacant since 2006. The concerned vacant school is one of the “Vacant School Premises Sites Reviewed under the Central Clearing House Mechanism” and is recommended to be retained for Government, Institution or Community (GIC) uses.

**6. Previous Application**

The Site is not the subject of any previous application.

**7. Similar Application**

- 7.1 There is one similar application (No. A/YL-MP/245) for proposed school (kindergarten) within the “V” zone in the OZP approved by the Rural and New Town Planning Committee (the Committee) of the Board on 22.1.2016. The application was approved on the grounds the proposed kindergarten would help to serve the need of the local community and was considered not incompatible with the surrounding land uses; concerned government departments had no objection to or adverse comment on the application; and the applicant had provided information and proposed measures to address the concern raised in the public comments.
- 7.2 Details of this application are summarised at **Appendix II**. Its location is shown on **Plan A-1**.

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

- 8.1 The Site is:
- (a) currently occupied by the vacant school premises of the former Koon Ying Primary School which had been closed since 2006 and the adjacent former school office building which had been used previously as the Mai Po Village Recreational Centre for the villagers;
  - (b) accessible from Castle Peak Road – Mai Po via a small section of local track in Mai Po Lo Wai; and
  - (c) within WBA of the Deep Bay area.
- 8.2 The surrounding areas mainly comprise Small Houses in Mai Po Lo Wai and Mai Po San Tsuen and vehicle parks. Some vehicle parks are suspected unauthorized developments subject to enforcement action by the Planning Authority:
- (a) to the east, northeast and southeast across Castle Peak Road- Mai Po is predominantly vegetated land, a public toilet and a refuse collection point;
  - (b) to the north and northwest is mixture of Small Houses of Mai Po Lo Wai, vehicle parks, open space, village office and storage yard; to the further northwest are ponds; and

- (c) to the south and southwest is mixture of small houses of Mai Po San Tsuen, vehicle parks, ancestral hall, and unused and vacant land.

## 9. **Planning Intention**

The planning intention of the “V” zone is to designate both existing recognized villages and areas of land considered suitable for village expansion. Land within this zone is primarily intended for development of Small Houses by indigenous villagers. It is also intended to concentrate village type development within this zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services. Selected commercial and community uses serving the needs of the villagers and in support of the village development are always permitted on the ground floor of a New Territories Exempted House. Other commercial, community and recreational uses may be permitted on application to the Board.

## 10. **Comments from Relevant Government Departments**

- 10.1 The following Government departments have been consulted and their views on the application are summarised as follows:

### **Land Administration**

- 10.1.1 Comments of the District Lands Officer, Yuen Long, Lands Department (DLO/YL, LandsD):

- (a) The Site falls within unleased and unallocated GL at Mai Po. The site area and extent of existing buildings/structures on the Site are subject to verification. Should the proposed planning application be approved and the applicant submits an application for short term tenancy (STT) for implementing the proposed school, such application will be dealt with by his department acting in the capacity as the landlord at his discretion, and if it is approved under such discretion, the approval would be subject to such terms and conditions including, among others, the payment of rental and administrative fee as may be imposed. The applicant should be reminded that policy support from relevant bureau is a prerequisite for the application of direct grant STT.
- (b) It is noted that vehicles parking spaces, loading and unloading spaces for taxi spaces and school bus are proposed in the scheme. Regarding vehicular access to the Site, please take note that LandsD has no record of management and maintenance responsibilities of the local access road. Vehicular access to the Site could not be secured over existing local access in the proposed STT in future.

- (c) Regarding LCSD's comments on making the Site available to meet the District Minor Works proposal (DMW) - children's playground and a sitting out area (in paragraph 10.1.11), it is difficult to consider if there is any clash of two competing uses (i.e. school and DMW) in the absence of any programme for its implementation. Regarding the related STT application, the STT will normally be granted for a fixed term of three years (or extended to 5 years with relevant Bureau's support) and thereafter quarterly. Departmental circulation, local consultation and policy support for the direct grant STT (including the fixed term) will be conducted during the processing of the STT application after applicant's obtaining planning approval.
- (d) According to his record, there is no Small House application being processed/approved at the Site.

### **Education**

#### 10.1.2 Comments of S for E (School Registration and Compliance Section):

##### Special Education Division

- (a) The Special Education Division informed that they are not in a position to offer comments on the application.

##### School Registration and Compliance Section

- (b) Registration of school is granted in accordance with the stipulated requirements under the Education Ordinance (Cap. 279) and relevant Guidelines. Clearance from the relevant departments, including Buildings Department, Fire Services Department, Lands Department and Planning Department, should be obtained. The applicant should also submit the documentary proof of the right to use the premises, Occupation Permit (for premises designed and constructed as a school), etc for his consideration.

### **Traffic**

#### 10.1.3 Comments of Commissioner for Transport (C for T):

- (a) Considering that the traffic flow for the Site would be negligible, he has no adverse comment on the application from traffic engineering point of view.
- (b) The Site is connected to the public road network via a section of local access which is not managed by Transport Department (TD). The land status of the local access road should be clarified

by LandsD by the applicant. Moreover, the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities accordingly.

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

- (a) The access arrangement to the Site from Castle Peak Road- Mai Po should be commented by TD.
- (b) HyD is not/shall not be responsible for the maintenance for any access connecting the Site and Castle Peak Road – Mai Po. The relevant department will provide their comments, if any.
- (c) Adequate drainage measures should be provided at the site access to prevent surface water flowing from the Site to nearby public roads or exclusive road drains.

10.1.5 Comments of the Chief Engineer/Railway Development 2-2, Railway Development Office, Highways Department (CE/RD 2-2, RDO, HyD):

He has no comment on the application from railway development point of view as the Site falls outside any administrative route protection boundary, gazetted railway scheme boundary or existing railway protection boundary of any rail systems.

**Environment**

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

He has no adverse comment on the application. According to the information provided, there is no change in land use. The proposed school for children with special education need/learning disabilities will be housed within the vacant village school site (ex-Koon Ying School). The existing building locks will be repaired and maintained, and all internal areas will be air-conditioned.

**Nature Conservation**

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

- (a) He has no comment on the application from nature conservation point of view.



- (b) The Site is a vacant school premise site. It is located within the WBA but is far away from fishpond/wetland habitat in the WCA. The Site is also approximately 200m away from the existing Mai Po Village Egrettry. According to the applicant, no major alterations and additions would be carried out to the existing buildings. Given the distance, impacts on the wetland habitat in WCA and the egrettry are not anticipated.
- (c) Should the application be approved, the applicant should be advised to properly preserve the existing trees on GL within the Site.

### **Urban Design and Landscape**

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

#### Urban Design

- (a) He has no particular comments on the application from visual and urban design perspectives. The Site and its surroundings are rural in character. It is occupied by the existing school premises of the former Koon Ying Public School with 1-2 storeys in height. The applicant proposed to maintain, repair and refurbish the existing buildings to be a primary school without any new development.

#### Landscape

- (b) He has no objection to the application from the landscape planning perspective.
- (c) The Site, located to east of Mai Po San Tsuen and west of Castle Peak Road – Mai Po, falls within an area zoned “V” on the OZP. The Site is not the subject of any previous application.
- (d) According to the aerial photos taken in 2018, the Site is situated in an area of rural landscape character. The surrounding area within the same “V” zone comprises of village houses and scattered tree groups. The Site is formerly the Koon Ying Public School, which was built in 1955 and has been vacated since 2006. According to the proposal, 2 existing buildings will be preserved, renovated and reused. There will be no new building or any structural alteration on the existing buildings. The proposed development is considered not incompatible with existing landscape setting in proximity.

- (e) According to the site survey submitted in the application, existing trees are found within the Site. The applicant mentioned that all existing trees will be preserved in-situ. Further significant landscape impact arising from the proposed development is not anticipated.
- (f) In view that the proposed development is unlikely to cause adverse significant visual and landscape impacts, landscape condition is not recommended, should the application be approved by the Board.

### **Fire Safety**

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

- (a) He has no objection in principle to the application subject to FSIs and water supplies for firefighting being provided to the satisfaction of his Department. Detailed fire service requirements will be formulated upon receipt of formal submission of general building plans
- (b) As no details of the emergency vehicular access (EVA) have been provided, comments could not be offered by his Department at the present stage. Nevertheless, the applicant is advised to observe the requirements of EVA as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Building 2011 which is administered by BD.

### **Drainage**

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

- (a) He has no objection in principle to the application from drainage operation and maintenance point of view.
- (b) The applicant shall submit a drainage submission to demonstrate how he will collect, convey and discharge rain water falling onto or flowing to his site. A clear drainage plan showing full details of the existing drains and the proposed drains (e.g. cover and invert levels of pipes/catchpits/outfalls and ground levels justifying waterflow etc.) with supporting design calculations and charts should be included. (For preparation of the drainage proposal, the Guideline on preparation of the drainage proposal is available in DSD homepage at [http://www.dsd.gov.hk/EN/Files/Technical\\_Manual/dsd\\_guideline/Drainage\\_Submission.pdf](http://www.dsd.gov.hk/EN/Files/Technical_Manual/dsd_guideline/Drainage_Submission.pdf) for reference). The applicant is

reminded that approval of the drainage proposal must be sought prior to the implementation of drainage works on site.

- (c) After completion of the required drainage works, the applicant shall provide DSD a set of record photographs showing the completed drainage works with corresponding photograph locations marked clearly on the approved drainage plan for reference. DSD will inspect the completed drainage works jointly with the applicant with reference to the set of photographs.
- (d) The applicant shall ascertain that all existing flow paths would be properly intercepted and maintained without increasing the flooding risk of the adjacent areas.
- (e) No public sewerage maintained by CE/MN, DSD is currently available for connection. For sewage disposal and treatment, agreement from DEP shall be obtained.
- (f) The applicant is reminded that the proposed drainage works as well as the site boundary should not cause encroachment upon areas outside his jurisdiction.
- (g) The applicant should consult DLO/YL, LandsD regarding all the proposed drainage works outside the site boundary in order to ensure the unobstructed discharge from the Site in future.
- (h) All the proposed drainage facilities should be constructed and maintained by the applicant at his own cost. The applicant should ensure and keep all drainage facilities on site under proper maintenance during occupancy of the Site.

### **Others**

#### 10.1.11 Comments of Director of Leisure and Cultural Services (DLCS):

- (a) The District Facilities Management Committee of Yuen Long District Council (YLDC DFMC) received and noted a DMW proposal for the construction of a children's playground and a sitting-out area at the vacant school premises of the former Koon Ying Public School at its meeting on 3 May 2013. According to the latest DMW progress report discussed by YLDC DFMC at its meeting on 6 September 2019, the said proposal is still on the priority list.

- (b) The DMW proposal is now under review by YLDC and there is no implementation programme at present. To strike a balance between the possible development of the Site and the gainful use of GL, he has no in-principle objection to the application subject to the agreement of the YLDC. The STT, if approved, for the proposed use on the Site may be terminated when YLDC would like to implement the development on the Site and his department will not be requested to compensate for the termination of the STT when the Site is required for development.

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

If the proposal involves any commercial/trading activities, no environmental nuisance should be generated to the surroundings. Also, for any waste generated from the commercial/trading activities, the applicant should handle on their own/at their expenses.

**District Officer's Comments**

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

His office has no comment on the application and the local comments should be submitted to the Board directly, if any.

10.2 The following Government departments have no objection to or comment on the application:

- (a) Chief Building Surveyor/New Territories West (CBS/NTW), BD;
- (b) Commissioner of Police (C of P);
- (c) Head of Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD);
- (d) Project Manager (West) (PM(W)), CEDD;
- (e) Director of Electrical and Mechanical Services (DEMS); and
- (f) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD).

**11. Public Comment Received During Statutory Publication Period**

On 27.9.2019, the application was published for public inspection. During the first three weeks of the statutory public inspection period which ended on 18.10.2019, no public comment was received.

## **12. Planning Considerations and Assessments**

- 12.1 The Site is currently occupied by the vacated school premises of the former Koon Ying Primary School which has been closed and left vacant since 2006. The applicant proposes to use the existing school buildings at the Site and its adjacent former school office site for a proposed school.
- 12.2 The Site falls within “V” zone which is primarily to reflect existing recognized and other villages, and to provide land considered suitable for village expansion and reprovisioning of village houses affected by Government projects. Land within this zone is primarily intended for development of Small Houses by indigenous villagers. Selected commercial and community uses serving the needs of the villagers and in support of village development are always permitted on the ground floor of a New Territories Exempted House. Other commercial, community and recreational uses may be permitted on application to the Board. According to DLO/YL, LandsD, there is no Small House application being processed/ approved at the Site. The concerned vacant school is one of the “Vacant School Premises Sites Reviewed under the Central Clearing House Mechanism” recommended to be retained for GIC uses. Considering that the application is to utilise the vacated premises of a previously closed school for school development and that the premises is recommended for retention for GIC uses, it is considered that the proposed school use is not in conflict with the planning intention of the Site. According to the applicant, the use of the Site for the proposed school is supported by the local villagers.
- 12.3 According to the applicant, the proposed school is dedicated for children with SEND. The proposed school, located in Mai Po, can serve the needs for specialised education in the Northwest New Territories. The proposed school, located within the village setting of Mai Po San Tsuen and Mai Po Lo Wai, is considered not incompatible with the surrounding areas which comprise mainly village houses, agricultural land, vehicle parks, ponds etc.
- 12.4 The Site falls within the WBA of the TPB PG-No. 12C. DAFC has no adverse comment on the application from nature conservation point of view considering that the Site is located far from fishpond/egretry and given the distance, impacts on the wetland habitat in WCA and the egretry are not anticipated. DEP and CTP/UD&L, PlanD have no adverse comments on the application from environmental and urban design and landscape perspectives considering the proposed school would be housed within vacant school premises. Other concerned Government departments, including D of FS, C for T and CE/MN, DSD have no objection to or no adverse comment on fire safety, traffic and drainage aspects respectively.
- 12.5 The Site was previously used as a primary school until 2006. There is one similar application (No. A/YL-MP/245) for proposed school (kindergarten) within the “V” zone in the OZP approved by the Committee on 22.1.2016

mainly on the grounds that the proposed kindergarten would help to serve the need of the local community and was considered not incompatible with the surrounding land uses. Approval of the current application is in line with the previous decision of the Committee.

- 12.6 There is no public comment on the application received during the statutory publication period.

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

- 13.1 Based on the assessment made in paragraph 12, the Planning Department has no objection to the application.
- 13.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 15.11.2023, 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 condition(s)

- (a) the submission and implementation of a drainage proposal to the satisfaction of the Director of Drainage Services or of the Town Planning Board; and
- (b) the design and provision of fire services installations and water supplies for firefighting to the satisfaction of the Director of Fire Services or of the Town Planning Board.

#### Advisory clauses

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

- 13.3 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 "V" zone which is intended to reflect existing recognized and other villages, and to provide land considered suitable for village expansion and reprovisioning of village houses affected by Government projects. There is no strong justification in the submission for a departure from such planning intention.

**14. Decision Sought**

- 14.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 14.2 Should the Committee decide to approve the application, Members are invited to consider the approval conditions and advisory clauses, if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 14.3 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.

**15. Attachments**

<b>Appendix I</b>	Application Form received on 18.9.2019
<b>Appendix Ia</b>	Planning Statement
<b>Appendix Ib</b>	Further Information received on 28.10.2019
<b>Appendix Ic</b>	Further Information received on 31.10.2019
<b>Appendix II</b>	Similar application within the “V” zone on the OZP
<b>Appendix III</b>	Recommended Advisory Clauses
<b>Drawing A-1</b>	Layout Plan
<b>Drawing A-2</b>	Section
<b>Drawing A-3</b>	Elevation
<b>Plan A-1</b>	Location Plan with Similar Applications
<b>Plans A-2a and 2b</b>	Site Plans
<b>Plan A-3</b>	Aerial Photo
<b>Plans A-4a to 4c</b>	Site Photos