

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/YL-HTF/1098

- Applicant** : Every Day Recycling Limited
- Site** : Lot 298 RP (Part) in D.D.128, Ha Tsuen Fringe, Yuen Long, New Territories
- Site Area** : 2,300 m² (about)
- Lease** : Block Government Lease (demised for agricultural use)
- Plan** : Approved Ha Tsuen Fringe Outline Zoning Plan (OZP) No. S/YL-HTF/12
- Zoning** : “Agriculture” (“AGR”)
- Application** : Proposed Temporary Plastic Recycling Centre with Workshop and Ancillary Office 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 plastic recycling centre with workshop and ancillary office for a period of 3 years. The Site falls within an area zoned “Agriculture” (“AGR”) on the Approved Ha Tsuen Fringe Outline Zoning Plan (OZP) No. S/YL-HTF/12 (**Plan A-1**). According to the Notes of the OZP for “AGR” zone, ‘rural workshop with recycling facilities’ is neither a Column 1 nor Column 2 use. According to the covering notes of the OZP, temporary use or development of any land or buildings not exceeding a period of 3 years within the zones requires planning permission from the Town Planning Board (the Board) notwithstanding that the use or development is not provided for under the Notes of the OZP. The Site is currently grassland (**Plans A-2 and A-4a to 4b**).
- 1.2 The Site involves one previous application (No. A/YL-HT/1040) for proposed temporary training centre (construction lifting crane) with ancillary site office and machinery repair workshop for a period of 3 years, which was rejected by the Board upon review on 20.1.2017. Details of the previous application are at paragraph 5 and **Appendix II**.
- 1.3 According to the applicant, the Site is accessible via a local track leading from Deep Bay Road. The ingress/egress is located at the eastern boundary of the Site (**Drawing A-1 and Plan A-2**). 2 temporary structures with a total floor area of

980m² and a building height of 6m each are proposed, including 1 plastic pellet-making workshop (one-storey) and 1 ancillary office (two-storey with shelter). The central portion of the Site (about 1,000m², 43.5% of the Site) is proposed for open storage of plastic materials. 4 private car parking spaces and 1 loading/unloading space for heavy goods vehicles (about 334m² in area) will be provided on the Site. The operation hours are from 8:00 a.m. to 8:00 p.m., Mondays to Sundays with no operation on public holidays.

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

- (a) Application Form received on 20.8.2019 with proposed layout plan **(Appendix I)**
- (b) Further Information received on 11.9.2019 in response to Transport Department's comments and clarifying the operation details **(Appendix Ia)**
(accepted and exempted from publication and recounting requirements)
- (c) Further Information received on 27.9.2019 in response to Antiquities and Monuments Office's comments and providing revised planning justifications as well as a revised proposed layout plan with open storage area and parking area **(Appendix Ib)**
(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 part 7 of the application form and the further information (**Appendices I, Ia and Ib**). They can be summarized as follows:

- (a) The applicant is a plastic recycling company and needs a large site to operate and to promote the recycling industry.
- (b) The operation hours are from 8:00 a.m. to 8:00 p.m., Mondays to Sundays with no operation on public holidays.
- (c) The Site is highly accessible. The staff can get to the workshop by public transport.
- (d) The applicant will register the Site on the Recycler Directory of the Environmental Protection Department.
- (e) The applicant would like to ensure the operation complies with the regulations.

3. Compliance with the "Owner's Consent/Notification" Requirements

The applicant is not the "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 Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) by posting site notice and sending registered post to the

Ha Tsuen Rural Committee. Detailed information would be deposited at the meeting for Members' inspection.

4. Background

The Site is currently not a subject of planning enforcement action.

5. Previous Application

The Site involves one previous application (No. A/YL-HT/1040) for proposed temporary training centre (construction lifting crane) with ancillary site office and machinery repair workshop for a period of 3 years, which was rejected by the Board upon review on 20.1.2017. The rejection reasons for the application include the proposed development was not in line with the planning intention of the "AGR" zone; the applicant failed to demonstrate that the proposed development would not generate adverse ecological, landscape, drainage and environmental impacts; and approval of the application would set an undesirable precedent for similar applications. Details of the previous application are summarized at **Appendix II** and its location is shown on **Plan A-1**.

6. Similar Applications

- 6.1 There are two similar applications (Nos. A/YL-HT/967 and A/YL-HTF/1093) for recycling workshop and centre uses within the same "AGR" zone and straddling the adjoining "Green Belt" zone ("GB") or "Residential (Group D)" ("R(D)") zone on the OZP. Details of these applications are summarized at **Appendix III** and the locations of these applications are shown on **Plan A-1**.
- 6.2 Application No. A/YL-HT/967 within the same "AGR" zone and adjoining "GB" zone for proposed temporary recyclable collection centre (including plastics and metals) was rejected by the Rural and New Town Planning Committee (the Committee) of the Board on 18.12.2015. The rejection reasons include the proposed development was not in line with the planning intentions of the "AGR" and "GB" zones; the proposed development was not compatible with the neighborhood and landscape character; the proposed development was not in line with the TPB-PG No. 13E that no previous approval has been granted for the application site, there were adverse departmental comments on the drainage, agricultural, landscape and environmental aspects as well as local objections; and approval of the application would set an undesirable precedent for similar applications.
- 6.3 Application No. A/YL-HTF/1093 within the same "AGR" zone and adjoining "R(D)" zone for proposed temporary plastic bottle recycling centre with workshop and ancillary office for a period of 3 years was rejected by the Committee on 1.2.2019. The rejection reasons include the proposed development was not in line with the planning intentions of the "AGR" and "R(D)" zones; the applicant failed to demonstrate no adverse traffic and environmental impacts; and approval of application would set an undesirable precedent for similar applications.

7. The Site and Its Surrounding Areas (Plan A-2 to Plan A-4a to 4b)

7.1 The Site is:

- (a) currently grassland; and
- (b) accessible via a local track leading from Deep Bay Road, which is a single track road.

7.2 The surrounding areas have the following characteristics:

- (a) to its north and north-west are residential dwellings (the nearest one is located at immediate north about 3m away), a pond and an open storage yard of construction machinery and recycling materials; to its further north across Deep Bay Road is the coastal area of Deep Bay (**Plan A-3a**);
- (b) to its east and north-east are grassland, a temple, residential dwellings, scrubland, parking of vehicles, vacant land, an open storage yard for bamboo and storage sites;
- (c) to its south and south-east are vacant land, residential dwellings and scrubland; and
- (d) to its west are an open storage yard of construction machinery, residential dwellings and fallow agricultural land.

8. Planning Intention

The planning intention of the “AGR” zone 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.

9. Comments from Relevant Government Departments

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

Land Administration

9.1.1 Comments of the District Lands Officer/Yuen Long (DLO/YL):

- (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 Deep Bay Road through Government Land and private lots. His office does not guarantee any right-of-way to the Site.
- (c) The Site falls within “Sha Kong Miu (South) Site of Archaeological Interest” (AM96-0710).

- (d) The Site does not fall within Shek Kong Airfield Height Restriction Area.
- (e) Should planning approval be given to the planning application, the lot owner(s) of the lot(s) without Short Term Waiver (STW) will need to apply to his office for permitting 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 Exempted Building(s) will be considered or allowed. Application(s) for any of the above will be considered by the LandsD acting in the capacity of the landlord or lessor at its sole discretion and there is no guarantee that such application(s) 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) According to the applicant's statement, the proposed use at the Site will involve traffic of container trucks.
- (b) Deep Bay Road is a single track road. The applicant is requested to justify that the nearby public road network has adequate capacity to accommodate the traffic induced by the proposed use at the Site. In particular the traffic impact on Deep Bay Road should be well assessed as a result of the proposed use, since it is highly likely that vehicles in opposite directions need to negotiate with each other where passing bay is not available.
- (c) In this connection, on the basis of the current information, he does not support the application from traffic engineering point of view.

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

- (a) The access arrangement should be commented by TD.
- (b) Adequate drainage measures should be provided at the site access to prevent surface water flowing from the Site to the nearby public roads/drains.
- (c) HyD shall not be responsible for the maintenance of any access connecting the Site and Deep Bay Road.

Nature Conservation

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

- (a) It is noted that the Site falls within the "AGR" zone and is currently a

piece of fallow land overgrown with weeds. Nevertheless, agricultural activities are active in the vicinity and agricultural infrastructures such as road access and water source are available. The Site can be used for agricultural activities such as open-field cultivation, greenhouse and plant nursery. As the Site possesses potential for agricultural rehabilitation, the application is not supported from agricultural point of view.

- (b) Meanwhile, the Site is adjacent to an active egretty (i.e. breeding ground of ardeids) to the immediate north-east of the Site. Based on the past egretty survey results, this egretty has been active for most of the breeding seasons since 1998. The egretty supported 27 nests of ardeids in 2019. Breeding ardeids are sensitive to disturbance. Although the proposed development would not involve large-scale construction works, there is ecological concern on potential impacts on the egretty due to removal of and/or damages on nesting trees/vegetation as well as noise, glare, visual and/or human disturbance arising from operation of recycling centre with workshop in close proximity to the egretty.
- (c) The Site is in vicinity to a watercourse to the south-west which flows towards the “Coastal Protection Area” zone and intertidal habitats in Deep Bay.

Environment

9.1.5 Comment of the Director of Environmental Protection (DEP):

- (a) DEP does not support the application as there are sensitive receivers of residential use in the vicinity (with the nearest one located at its immediate north about 3m away) (**Plan A-2**) and environmental nuisance is expected.
- (b) There is no substantiated pollution complaint pertaining to the Site in the past three years.
- (c) Should the planning application be approved, 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*”.

Landscape

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

- (a) The Site, located to the south of Deep Bay Road, lies in an area of “AGR” zone. The Site is subject to previous planning application No. A/YL-HT/1040 for temporary training centre use, to which he objected from landscape planning perspective. The current application seeks planning permission for temporary plastic recycling centre with workshop and ancillary office for a period of 3 years at a smaller site.

- (b) With reference to the site visit on 4.9.2019 and aerial photo of 2018 (**Plan A-3a**), the Site is cleared with some existing large trees outside the northern and southern boundaries. The Site is in an area of rural coastal landscape character dominated by woodland to the south, open storage yards and mangroves across the road to the north. The proposed use of the Site is incompatible with the surrounding landscape character and not in line with the planning intention of “AGR” zone.
- (c) When comparing the aerial photos of 2013 (**Plan A-3c**), 2015 (**Plan A-3b**) and 2018 (**Plan A-3a**), the Site was originally used actively for agriculture but had been cleared and formed in 2015. Landscape impact had taken place.
- (d) Approval of the application would set an undesirable precedent attracting other similar development to blanket clear and form the Site prior to obtaining planning permission. The cumulative effect of which would be result in a general degradation of the rural coastal landscape character of the area. He has reservation on the application from landscape planning perspective.
- (e) As the Site is not facing any prominent public frontage and there are existing trees surrounding the Site, it is considered not necessary to impose a landscape condition should the application be approved by the Board.

Drainage

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

- (a) He has no objection in principle to the proposed application from drainage point of view.
- (b) Should the Board consider that the application is acceptable from planning point of view, he would suggest a condition to be stipulated in the approval letter requiring the applicant to submit a drainage proposal, to implement and to maintain the proposed drainage facilities to the satisfaction of the Director of Drainage Services.

Building Matters

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

- (a) Before any new building works (including containers/open sheds as temporary buildings, demolition and land filling) are to be carried out on the Site, prior approval and consent from Building Authority should be obtained, otherwise they are unauthorized building works (UBW) under the Buildings Ordinance (BO). An Authorized Person (AP) should be appointed as the co-ordinator for the proposed building works in accordance with the BO.

- (b) 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.
- (c) 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 Building (Planning) Regulations at the building plan submission stage.

Fire Safety

9.1.9 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.
- (c) 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.
- (d) The applicant is reminded that if the proposed structure(s) is required to comply with the Buildings Ordinance (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.

Cultural Heritage

9.1.10 Comments of the Antiquities and Monuments Office (AMO):

- (a) The Site is situated within the Sha Kong Miu (South) Site of Archaeological Interest where archaeological remains dated to the late Neolithic period and Bronze Age were identified. Having considered the applicant has indicated that the proposed use does not involve diversion of stream, filling of pond, filling of land or excavation of land and further clarified that there will not be any site formation and ground excavation works involved, AMO has no objection to the application.
- (b) The applicant is reminded to consult AMO should there be any changes of works that would involve site formation and/or ground excavation works for the proposed use at the Site.

Others

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

- (a) No Food and Environmental Hygiene Department's (FEHD) facilities will be affected and such work and operation shall not cause any environmental nuisance, pest infestation and obstruction to the surrounding.
- (b) For any waste generated from such activity / operation, the applicant should arrange disposal properly at her own expenses.
- (c) Proper licence / permit issued by FEHD is required if there is any catering service / activities regulated by the DFEH under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public.

District Officer's Comments

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

His office has received 1 comment from the villagers of Sha Kong Tsuen (**Appendix IV**) objecting to the application mainly on the grounds that the proposed use will produce toxins and odor causing health impacts.

9.2 The following Government departments have no comment on the application:

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

10. Public Comments Received During Statutory Publication Period

On 27.8.2019, the application was published for public inspection. During the first three weeks of the statutory public inspection period which ended on 17.9.2019, 9 public comments were received from two Yuen Long District Councilors, the villagers of Sha Kong Tsuen, two individuals, Kadoorie Farm & Botanic Garden Corporation, World Wide Fund for Nature Hong Kong, Designing Hong Kong and Hong Kong Bird Watching Society objecting to the application (**Appendices V-1 to V-9**). The main objecting reasons are summarized below:

- (a) the proposed use is not in line with the planning intention of the "AGR" zone;
- (b) the proposed use will produce toxins causing air pollution, water pollution and health impacts;

- (c) there were already complaints about the odor emitting from the open storage sites of recycling materials in Tin Shui Wai and Lau Fau Shan;
- (d) strong objections to the current planning application were raised in the Yuen Long District Council District Management Committee meeting;
- (e) the Site is near the wetland in Deep Bay Area which has high ecological value. The proposed use will jeopardize the ecological integrity of the wetland;
- (f) the Site is close to the egretty at Ngau Hom Shek. The proposed use will undermine the habitat quality of the egretty and the breeding of birds;
- (g) there is insufficient information in the submission to demonstrate the proposed use will have no adverse environmental, ecological, sewerage and traffic impacts;
- (h) there is no strong justification to approve the application;
- (i) no previous approval has been granted for the Site;
- (j) the proposed use is not compatible with rural neighborhood. The Board should not encourage “develop first, apply later”; and
- (k) approval of the application would set an undesirable precedent for similar applications and cumulative effect of which would result in general degradation of the environment of the area.

11. Planning Considerations and Assessments

- 11.1 The subject application is for proposed temporary plastic recycling centre with workshop and ancillary office at the Site zoned “AGR” on the OZP. The planning intention of the “AGR” zone is primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. The proposed temporary plastic recycling centre with workshop and ancillary office use is not in line with the planning intention of the “AGR” zone. In this regard, DAFC does not support the application from the agricultural point of view as the Site is considered having high potential for agricultural rehabilitation. There is no strong planning justification in the submission for a departure from such planning intention, even on a temporary basis.
- 11.2 The Site is located in an area of rural coastal landscape character dominated by woodland to the south, residential dwellings to the north-west and north-east and mangroves across the road to the north (**Plan A-2**). Although there are some open storage sites in the vicinity, they are mainly unauthorized developments and subject to planning enforcement action. The proposed use is considered not compatible with the surrounding landscape character.
- 11.3 The applicant fails to demonstrate the proposed use would not have adverse traffic, environmental, ecological and landscape impacts on the surrounding. C for T does not support the application from traffic engineering point of view. He has concern on the additional traffic flow of heavy goods vehicles generated by the proposed use on Deep Bay Road which is a single track road and the applicant has yet to address his concern. DEP also does not support the application as there are

sensitive receivers of residential use in the vicinity of the Site, with the nearest one located at its immediate north about 3m away (**Plan A-2**), and environmental nuisance is expected. In addition, DAFC has ecological concern on the application, as the Site is immediately adjacent to an active egretty and the proposed use will cause potential impact on the egretty. CTP/UD&L has reservation on the application from landscape planning perspective as approval of the application would degrade the rural landscape character of the area.

- 11.4 No approval for similar rural workshop use with recycling facilities has ever been granted by the Committee within the same “AGR” zone. Approval of the application, even on a temporary basis, would set an undesirable precedent for similar applications within the “AGR” zone. The cumulative effect of approving such similar applications would result in a general degradation of the rural environment and landscape quality of the area. As such, rejecting the current application is in line with the Committee’s previous decisions.
- 11.5 10 public comments were received objecting to the application mainly on the grounds stated in paragraphs 9.1.11 and 10. The planning considerations and assessments in paragraphs 11.1 to 11.4 are relevant.

12. Planning Department’s Views

- 12.1 Based on the assessment made in paragraph 11 and having taken into account the public comments mentioned in paragraphs 9.1.11 and 10, the Planning Department does not support the application for temporary plastic recycling centre with workshop and ancillary office for the following reasons:
- (a) the proposed use 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, and also to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes. There is no strong planning justification in the submission for a departure from such planning intention, even on a temporary basis;
 - (b) the applicant fails to demonstrate that the proposed use would not generate adverse traffic, environmental, ecological and landscape impacts on the surrounding areas; and
 - (c) approval of the application, even on a temporary basis, would set an undesirable precedent for similar applications for other developments within the “AGR” zone, the cumulative effect of which will result in a general degradation of the rural environment of the area.
- 12.2 Alternatively, 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 **18.10.2022**. The following conditions of approval and advisory clauses are also suggested for Members’ reference:

Approval Conditions

- (a) no operation from 8:00 p.m. to 8:00 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;
- (b) no operation on public holidays, as proposed by the applicant, is allowed on the Site during the planning approval period;
- (c) no vehicle exceeding 24 tonnes is allowed to enter/exit or to be parked/stored on the Site at any time during the planning approval period;
- (d) the submission of a 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 **18.4.2020**;
- (e) in relation to (d) above, the implementation of the 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 **18.7.2020**;
- (f) in relation to (e) above, the implemented drainage facilities shall be maintained at all times during the planning approval period;
- (g) the submission of a fire service installations proposal within **6** months from the date of planning approval to the satisfaction of Director of Fire Services or of the Town Planning Board by **18.4.2020**;
- (h) in relation to (g) above, the implementation of the fire service installations proposal within **9** months from the date of planning approval to the satisfaction of Director of Fire Services or of the Town Planning Board by **18.7.2020**;
- (i) the provision of fencing of the Site within **6** months from the date of planning approval to the satisfaction of the Director of Planning or of the Town Planning Board by **18.4.2020**;
- (j) if any of the above planning conditions (a), (b), (c) or (f) is not complied with during the approval period, the approval hereby given shall cease to have effect and shall be revoked immediately without further notice;
- (k) if any of the above planning conditions (d), (e), (g), (h) or (i) is not complied with by the above specified date, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice; and
- (l) upon 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 VI**.

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 reject the application, Members are invited to advise what reasons for rejection should be given to the applicant.
- 13.3 Alternatively, 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.

14. Attachments

Appendix I	Application Form received on 20.8.2019 with proposed layout plan
Appendix Ia	Further Information of 11.9.2019 in response to Transport Department's comments and clarifying the operation details
Appendix Ib	Further Information received on 27.9.2019 in response to Antiquities and Monuments Office's comments and providing revised planning justifications as well as a revised proposed layout plan with open storage area and parking area
Appendix II	Previous Application covering the Site
Appendix III	Similar Applications within the same "AGR" zone
Appendix IV	Local Comment Relayed by DO(YL), HAD
Appendices V-1 to V-9	Public Comments Received During Statutory Publication Period
Appendix VI	Advisory Clauses
Drawing A-1	Proposed Layout Plan
Plan A-1	Location Plan
Plan A-2	Site Plan
Plans A-3a to 3c	Aerial Photos
Plans A-4a to 4b	Site Photos

**PLANNING DEPARTMENT
OCTOBER 2019**