RNTPC Paper No. A/TM-LTYY/354A For Consideration by the Rural and New Town Planning Committee on 5.10.2018

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

APPLICATION NO. A/TM-LTYY/354

<u>Applicant</u>	:	South Wing Machinery Company Limited represented by New Creation Consultant Engineering Company Limited	
<u>Site</u>	:	Lot 1167 RP in D.D. 130 near Wong Kong Wai Road, Castle Peak Road, Lam Tei, Tuen Mun, New Territories	
<u>Site Area</u>	:	About 723 m ²	
<u>Lease</u>	:	Block Government Lease (demised for agricultural use)	
<u>Plan</u>	:	Draft Lam Tei and Yick Yuen Outline Zoning Plan (OZP) No. S/TM-LTYY/9	
<u>Zoning</u>	:	"Residential (Group C)" ("R(C)") (92%) [Restricted to a maximum plot ratio of 0.4 and a maximum building height of 3 storeys (9m)] and "Village Type Development" ("V") (8%) [Restricted to a maximum building height of 3 storeys (8.23m)]	
Application	:	Proposed Temporary Shop and Services (Model Toy Shop) for a Period of 3 Years	

1. <u>The Proposal</u>

- 1.1 The applicant seeks planning permission to use the application site (the Site) for proposed temporary shop and services (Model Toy Shop) for a period of 3 years (**Plan A-1**). According to the Notes for "R(C)" and "V" zones on the OZP, 'Shop and Services' is a Column 2 use which requires permission from the Town Planning Board (the Board). The applicant currently seeks temporary permission for a period of 3 years. The Site is currently vacant.
- 1.2 The major development parameters of the proposed development are as follows:

Site area	723 m^2
Total floor area	98 m^2
No. of structures	2 (for model toy shop and toilet)
Height of structures	4.5 m and 2.4 m (1 storey)
No. of parking spaces	2

No. of loading/unloading spaces	1
Operation hours	8:00 a.m. to 8:00 p.m. daily (including Sundays and public holidays)

- 1.3 The proposed layout plan, drainage plan, landscape plan and fencing plan are at **Drawings A-1 to A-4**.
- 1.4 In support of the application, the applicant has submitted the following documents:

(a)	Application form received on 23.5.2018	(Appendix I)
(b)	Supplementary plans attached to the application form	(Appendix Ia)
(c)	Letter of 3.7.2018 changing the ingress/egress point and clarifying the need of the parking spaces (accepted and exempted from publication and recounting requirement)	(Appendix Ib)
(d)	Letter of 31.8.2018 revising the number of private car parking spaces, justifying the location and the need for the open area, and providing a fencing plan and an updated layout plan (accepted and exempted from publication and recounting requirement)	(Appendix Ic)
(e)	Letter of 20.9.2018 clarifying that the ingress/egress will only be used by the shop and providing information of the model products (accepted and exempted from publication and recounting requirement)	(Appendix Id)

1.5 The application was originally scheduled for the consideration by the Committee on 20.7.2018. On 20.7.2018, the Committee agreed to defer a decision on the application for two months as requested by the applicant. On 3.7.2018, 31.8.2018, and 20.9.2018, further information were received. Therefore, the application is scheduled for consideration by the Committee at this meeting.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in the justifications at **Appendices I to Ic**. They can be summarized as follow:

- (a) 'Shop and Services' is a Column 2 use in "V" and "R(C)" zones.
- (b) There is a Lam Tei Pet Park opposite to the Site. Children usually visit the park with their families and pets during evenings and holidays. The proposed model toy shop may provide one more spot for their enjoyment. The open area is reserved for the children to play with the wireless toy models and displaying of toy models.
- (c) Owner's consent has been sought to use part of the adjoining Lot 1171 (hatched area on **Drawing A-1**) leading to Wong Kong Wai Road for ingress/egress. The adjacent open storage yard of construction machinery will not use the same ingress/egress.

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

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 Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) by sending registered mail to the lot owner. Detailed information would be deposited at the meeting for Members' inspection.

4. <u>Background</u>

The Site is a subject of previous enforcement actions on unauthorized storage use (Enforcement Case No. CEP/E/TM-LTYY/359, (**Plan A-2**)). Enforcement Notice was issued on 22.12.2017 requiring the concerned parties to discontinue the unauthorized development (UD) at the Site by 22.2.2018. Recent site inspection revealed that the UD at the Site was discontinued and Compliance Notice was issued on 18.7.2018.

5. <u>Previous Application</u>

There is no previous application covering the Site.

6. <u>Similar Applications</u>

There are two similar applications (Applications No. A/TM-LTYY/288 and 327) for temporary shop and services (convenience store/real estate agency) within the same "V" zone approved by the Committee on 12.12.2014 and 3.3.2017 respectively. Application No. A/TM-LTYY/288 was revoked due to non-compliance with approval condition. There is no similar application within the same "R(C)" zone. Details of the similar applications are summarized at **Appendix II** for Members' reference. The locations are shown on **Plan A-1**.

7. <u>The Site and Its Surrounding Areas</u> (Plans A-1 to A-4)

- 7.1 The Site is:
 - (a) currently vacant; and
 - (b) accessible via the adjoining lot, part of which is currently used as open storage, and a strip of government land from Wong Kong Wai Road connecting Castle Peak Road Lam Tei (**Drawing A-1**).
- 7.2 The surrounding areas have the following characteristics:
 - (a) to the immediate north is an open storage yard which may be tolerated under the Town Planning Ordinance (the Ordinance);
 - (b) to the immediate east and south are vacant land. To the north, north east and south east are mainly village type developments/residential dwellings;
 - (c) to the further south is a car park with car washing services, and the Lam Tei Pet Park under Kong Sham Western Highway; and

(d) to the west is Wong Kong Wai Road leading to Castle Peak Road – Lam Tei.

8. <u>Planning Intentions</u>

- 8.1 The "R(C)" zone is intended primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board.
- 8.2 The planning intention of the "V" zone is to reflect existing recognized and other villages, and to provide land considered suitable for village expansion and re-provisioning of village houses affected by Government projects. 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 NTEH. Other commercial, community and recreational uses may be permitted on application to the Board.

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

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

Land Administration

- 9.1.1 Comments of the District Lands Officer/Tuen Mun, Lands Department (DLO/TM, LandsD):
 - (a) The Site falls within Lot No. 1167 RP in D.D.130 ("the Lot"). The Lot is an Old Schedule 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 via a strip of government land leading from Wong Kong Wai Road. His office does not carry out maintenance works for the said road nor guarantee any right-of-way will be given to the Site.
 - (c) If planning permission is given by the Board, the lot owner may consider submitting a formal application to his office for a Short Term Waiver to permit erection of the proposed structures on the Lot. However, there is no guarantee that the application will be approved and he reserves his right to take any action as may be appropriate. The application will be considered by Lands Department acting in the capacity as the landlord at its sole discretion. In the event that the application is approved, it would be subject to such terms and conditions as the Government shall deem

fit to do so, including charging of waiver fee, deposit and administration fee etc.

- (d) Notwithstanding the above, his office reserves the right to take enforcement actions as considered appropriate against any unauthorized erection/extensions/alterations of structures should the same are found or any other breaches of the lease conditions irrespective of whether planning permission has been given or not.
- (e) There is no small house application at the subject lot, and one outstanding small house application in the vicinity of the Site.

Building Matters

- 9.1.2 Comments of the Chief Building Surveyor/New Territories West (CBS/NTW), BD:
 - (a) Before any new building works (including erection of container and connection of drains) are to be carried out on the Site, the prior approval and consent of the BD should be obtained, otherwise they are Unauthorized Building Works (UBW). An Authorized Person (AP) should be appointed as the co-ordinator for the proposed building works in accordance with the Buildings Ordinance.
 - (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) In connection with (a) above, 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.
 - (d) 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.
 - (e) Detailed comments will be made at the building plan submission stage.

Environment

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

- (a) The proposed use is not anticipated to have adverse environmental implications and he has no objection to the application.
- (b) Nevertheless, the applicant should be advised that public sewers are available at Castle Peak Road and also Fuk Hang Tsuen Road. The applicant can choose to connect sewage discharge to the public sewer nearby. The applicant is advised to seek approval from DSD for the sewer connection.
- (c) There was no environmental complaint pertaining to the Site received in the past 3 years.
- (d) Regarding the AFCD's memo which suggested consulting EPD on water pollution issue since the subject site is adjacent to watercourse in its northern side (**Plan A-2**), he notes that the applicant has proposed to use "流動式臨時男女洗手間" (portable toilet) as stated in the application documents. Provided that all sewage from the portable toilet will be trucked away and properly disposal of by a licensed contractor in accordance with the Water Pollution Control Ordinance and relevant regulations and there would not be any discharge from the portable toilet, he has no in-principle objection to such sewage disposal arrangements for a temporary use.
- 9.1.4 Comments of the Director of Agriculture, Fisheries and Conservation (DAFC):
 - (a) It is noted that the Site falls within "R(C)" and "V" zones under the relevant OZP. Since the Site is disturbed in nature, he has no comment on the application from the perspective of nature conservation.
 - (b) Since the subject location is adjacent to watercourse in its northern side, comments from EPD for water pollution issue may be necessary.

Traffic

- 9.1.5 Comments of the Assistant Commissioner for Transport/New Territories, Transport Department (AC for T/NT, TD):
 - (a) He has no adverse comment on the application from the traffic engineering viewpoint.
 - (b) However, since the access road to the Lot is a village road and not managed by TD, the applicant shall seek comments from HAD and LandsD separately.
 - (c) No vehicles are allowed to queue back to public roads or reverse onto/from public roads.

- 9.1.6 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD):
 - (a) The access arrangement should be commented by TD.
 - (b) If the access arrangement is agreed by TD, the applicant should construct a run in/out at the access point at Wong Kong Wai Road in accordance with the latest version of Highways Standard Drawing no. H1113 and H1114, or H5133, H5134 and H5135, whichever set is appropriate to match with the existing adjacent pavement.
 - (c) The proposed access from the Site to Wong Kong Wai Road is not and will not maintained by HyD.
 - (d) Adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains.

<u>Drainage</u>

- 9.1.7 Comments of the Chief Engineer/Mainland North (CE/MN), DSD:
 - (a) He has no objection in principle to the application from public drainage point of view.
 - (b) Should the application be approved, a condition should be included to request the applicant to submit, implement and maintain a drainage proposal for the Site to ensure that it will not cause adverse drainage impact to the adjacent area. The applicant should be reminded to incorporate the following comments when submitting the drainage proposal.
 - i. The applicant should refer to the guidelines as specified in "Technical Note to prepare a Drainage Submission" which is available at DSD's website (http://www.dsd.gov.hk/EN/ Technical_Manuals/DSD_Guidelines/index.html).
 - ii. The proposed drainage works, whether within or outside the lot boundary, should be constructed and maintained by the lot owner at the lot owner at their own expense. For any works to be carried out outside his lot boundary, the applicant should consult DLO/TM and seek consent from relevant lot owners before commencement of the drainage works.
 - iii. It is noted that the applicant proposed to make a drainage connection to an existing drainage channel near the Site. According to his record, the existing u-channel is not maintained by DSD. The applicant should be reminded to see consent from HAD/relevant owner(s) prior to the drainage works.

- iv. The applicant should implement the drainage facilities on site in accordance with the drainage proposal.
- v. 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 or nuisance caused by a failure of the drainage system.
- vi. The proposed development should neither obstruct overland flow nor adversely affect any existing natural streams, village drains, ditches and the adjacent areas.
- vii. EPD should be consulted regarding to sewerage aspects of the proposed development.

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 the satisfaction of the D of FS.
 - (b) In consideration of the design/nature of the structures, 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; and the location of where the proposed FSIs to be installed should be clearly marked on the layout plans.
 - (d) However, 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.

Landscape

- 9.1.9 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):
 - (a) With reference to the aerial photo of 2018, it is observed that the Site is operating as an open storage yard without any significant vegetation. Village houses are observed to the north east of the Site. The Site is situated in an area of village landscape character

disturbed by open storage yards. Significant change to the landscape character arising from the application is not envisaged. He has no objection to the application from the landscape planning point of view.

- (b) The submitted landscape proposal is confusing and illegible. As the applicant only drew two lines to represent the 24 proposed trees, the landscape proposal lacks basic and important information such as proposed tree location(s) (including alignment) and reference of scale. On the other hand, the proposed U-channels along the northern and southern boundaries as indicated on the rainwater drainage plan are in direct conflict with the proposed tree planting. On the whole, there is inadequate information to ascertain the feasibility of the landscape proposal.
- (c) In continuation to the above, despite the Applicant proposing 24 nos. relatively small size nursery stocks of tree species (*Ficus* microcarpa 細葉榕, which is erroneously stated as 細頁榕 in the application) it is unlikely able to provide effective screening. With reference to "Technical Note on the Submission and Implementation of Landscape Proposals for Compliance with Conditions for Approved Applications for Open Storage and Port Back-up Uses" published by PlanD, all new trees should be a minimum of 2.75m height at planting.
- (d) In view of the above, should the Board approve this application, he would recommend that the following condition be included in the permission:

the submission and implementation of a revised landscape proposal to the satisfaction of the Director of Planning or of the Board.

- (e) For useful information on how to submit a landscape proposal, the Applicant may wish to refer to "Technical Note on the Submission and Implementation of Landscape Proposals for Compliance with Conditions for Approved Applications for Open Storage and Port Back-up Uses" published by PlanD.
- (f) In consideration of the nature of proposed land use of the application, the Applicant may wish to propose other native species of aesthetic or fruiting tree species complementary to the vicinity in lieu of the proposed Ficus microcarpa that requires considerable aerial and underground space for its canopy and root system.
- (g) The Applicant is advised that there precautious measures such as bollards should be proposed to prevent damage from vehicles, and that each new tree shall have a minimum soil provision of 1m (W) x 1m (L) x 1.2m (D).

- (i) The Applicant is reminded that approval of the tree preservation and landscape proposal does not imply approval of tree works such as pruning, transplanting or felling under lease. Tree felling applications should be submitted direct to DLO for approval.
- 9.1.10 Comments of the Director of Leisure and Cultural Services (DLCS):
 - (a) The applicant is reminded that from tree preservation point of view, every possible effort should be made to preserve existing trees within and adjacent to the work site and minimize the adverse impact to them during the works period; and if trees are inevitably affected, Tree Preservation and Removal Proposal (TPRP) should be submitted for approval in accordance with DB TC(W) No. 7/2015.
 - (b) It is also noted from the drawings that a total of 24 Ficus microcarpa (細葉榕) are proposed to be planted on site for beautification purpose. Maintenance of these trees should rest with the developer.

Long Term Development

9.1.11 Comments of the Project Manager (West), Civil Engineering and Development Department (PM(W), CEDD) and the Chief Town Planner/Housing & Office Land Supply, PlanD (CTP/HOLS, PlanD):

The Site falls within the Study Area of the on-going Preliminary Land Use Study for Lam Tei Quarry and the Adjoining Areas (the Study) jointly commissioned by CEDD and PlanD. He has no specific comment as far as the Study is concerned.

District Officer's Comments

9.1.12 Comments of the District Officer (Tuen Mun), Home Affairs Department (DO(TM), HAD):

He has distributed consultation letters to the locals concerned and understand that they would provide their comments (if any) to the Board direct. He has no further comment.

- 9.2 The following Government departments have no comment on the application:
 - (a) Director of Electrical and Mechanical Services (DEMS);

- (c) Antiquities and Monuments Office, Commissioner for Heritage's Office (AMO, CHO);
- (d) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and
- (e) Commissioner of Police (C of P).

10. Public Comment Received During Statutory Publication Period

On 1.6.2018, the application was published for public inspection. During the first three weeks of the statutory public inspection period, which ended on 22.6.2018, no public comment was received.

11. Planning Considerations and Assessments

- 11.1 The "R(C)" zone is intended primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board. The "V" zone is intended is to reflect existing recognised 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. The proposed development is not in line with the planning intentions of the "R(C)" and "V" zone. There is no strong planning justification for a departure from the planning intention, even on a temporary basis.
- 11.2 To the immediate north of the Site is an open storage yard of construction machinery (**Plan A-2**). As the site abutting the north of the application site is for open storage use which may be tolerated under the Ordinance, the open storage use would likely continue to operate. According to the applicant, the proposed model toy shop would provide an area to serve the children during evenings and holidays. Given its location is in very close proximity to an open storage yard, the proposed model toy shop is considered incompatible with the surrounding land uses.
- 11.3 The applicant claimed that owner's consent has been sought for the proposed shop to use part of the adjoining Lot 1171 (hatched area on **Drawing A-1**) leading to Wong Kong Wai Road for the ingress/egress of the proposed shop. It is noted that the existing open storage yard is currently using two access points, one abutting Castle Peak Road-Lam Tei and another one leading to Wong Kong Wai Road which is the proposed access of the Site (**Plans A-2 and A-3**). Although the applicant claimed that the access leading to Wong Kong Wai Road will be solely used by the proposed shop, there is no guarantee that the operator of the open storage yard would stop using the proposed access of the Site which is considered undesirable from the road safety point of view.
- 11.4 There is no similar application within the same "R(C)" zone. Two similar applications (Applications No. A/TM-LTYY/288 and 327) within the same "V" zone were approved by the Committee between 2014 and 2017.
- 11.5 There is no public comment on the application.

12. Planning Department's Views

12.1 Based on the assessment made in paragraph 11 above, the Planning Department does not support the application for the following reasons:

the development is not in line with the planning intention of the "Residential (Group C)" ("R(C)") zone. The "R(C)" zone is intended primarily for low-rise, low-density residential developments There is no strong planning justification in the current submission for a departure from such planning intentions, even on a temporary basis;

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 5.10.2021. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval conditions

- (a) no operation between 8:00 p.m. and 8:00 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;
- (b) no medium and heavy goods vehicles exceeding 5.5 tonnes, including container tractors/trailers, as defined in the Road Traffic Ordinance, as proposed by the applicant, are allowed to be parked/stored on or enter/exit the Site at any time during the planning approval period;
- (c) no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (d) the submission of a drainage proposal within **6 months** from the date of the planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by **5.4.2019**;
- (e) in relation to (d) above, the implementation of the drainage proposal within
 9 months from the date of the planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by <u>5.7.2019</u>;
- (f) the implemented drainage facilities shall be maintained at all times during the planning approval period;
- (g) the submission of a run-in/out proposal within **6 months** from the date of planning approval to the satisfaction of the Director of Highways or of the TPB by **5.4.2019**;
- (h) inrelation to (g) above, the provision of the run-in/out within **9 months** from the date of the planning approval to the satisfaction of the Director of Highways or of the TPB by **5.7.2019**.
- the submission of a fire service installations proposal within 6 months from the date of the planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by <u>5.4.2019</u>;

- (k) the submission of a revised 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 <u>5.4.2019</u>;
- (l) in relation to (k) above, the implementation of the revised landscape proposal within **9 months** from the date of planning approval to the satisfaction of the Director of Planning or of the Town Planning Board by **5.7.2019**;
- (m) 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 TPB by <u>5.4.2019</u>;
- (n) if any of the above planning conditions (a), (b), (c) or (f) 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;
- (o) if any of the above planning conditions (d), (e), (g), (h), (i), (j), (k), (l) or
 (m) 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
- (p) upon the expiry of the planning permission, the reinstatement of the application 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 III.

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. <u>Attachments</u>

Appendix I Appendix Ia Appendix Ib	Application form received on 23.5.2018 Supplementary plans attached to the application form Letter of 3.7.2018 changing the ingress/egress point and clarifying the need of the parking spaces
Appendix Ic	Letter of 31.8.2018 revising the number of private car parking spaces, justifying the location and the need for the open area, and providing a fencing plan and an updated layout plan
Appendix Id	Letter of 20.9.2018 clarifying that the ingress/egress will only be used by the shop and providing information of the model products
Appendix II	Similar s.16 Applications within the same "V" Zone on the Draft Lam Tei and Yick Yuen OZP No. S/TM-LTYY/9
Appendix III	Advisory Clauses
Drawing A-1	Proposed Layout Plan
Drawing A-2	Proposed Drainage Plan
Drawing A-3	Proposed Landscape Plan
Drawing A-4	Proposed Fencing Plan
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plan A-4	Site Photos

PLANNING DEPARTMENT OCTOBER 2018