RNTPC Paper No. A/TM/514 For Consideration by the Rural and New Town Planning Committee on 2.3.2018

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

APPLICATION NO. A/TM/514

Applicant Gleeville One Company Limited represented by Vision Planning

Consultants Limited

Application Site Tuen Mun Town Lot 75, 5 San Yick Lane, Tuen Mun, New Territories

Site Area About 1,858.06m²

<u>Lease</u> Tuen Mun Town Lot (TMTL) No. 57

(a) Industrial or godown purposes or both (excluding any offensive trade)

(b) Erection of a factory or factories or a warehouse or warehouses or both, ancillary offices, such canteen or welfare facilities for workmen employed thereon and caretakers' or watchmen's quarters

Plan Draft Tuen Mun Outline Zoning Plan (OZP) No. S/TM/34

Zoning "Industrial" ("I")

[Restricted to a maximum plot ratio (PR) of 9.5 and maximum building height (BH) of 85mPD, or the plot ratio and building height of the

existing building, whichever is the greater]

Application Office cum Shop and Services (Ground Floor only)

1. The Proposal

- The applicant seeks planning permission for a proposed commercial building for 'Office' cum 'Shop and Services (Ground Floor only)' uses at 5 San Yick Lane, Tuen Mun (the Site) on the draft Tuen Mun OZP No. S/TM/34 (Plan A-1). According to the Notes of the OZP of the "I" zone, 'Office' and 'Shop and Services (Ground Floor only)' uses are under Column 2 which require planning permission from the Town Planning Board (the Board).
- 1.2 The proposed development has 19 storeys comprising shop and services, lobby on G/F, office use from 1/F to 17/F and a basement carpark (**Drawings A-1 to A-4**). The development has a building height of 84.95mPD (at the main roof) and a total non-domestic gross floor area (GFA) of about 17,651m². A

landscape area of 186.257m² will also be provided on G/F (**Drawing A-1**). The major development parameters are summarised as follows:

Site Area	About 1,858.06m ²
Total Non-domestic GFA	About 17,651m ²
• Office	17,233m ²
Shop and Services	173m ²
• Lobby	245m ²
Plot Ratio	Not more than 9.5
Site Coverage	About 60%
Building Height	84.95mPD (at the main roof)
Total no. of storeys	19 (including one level basement)
Internal Transport Facilities	
Carparking spaces	87
Motorcycle parking space	9
• Loading/Unloading (L/UL)	
- Light goods vehicle bays	5
- Heavy goods vehicle bays	2
Landscape area	186.257m ²

1.3 The main uses by floor in the proposed development is summarised below:

Floor	Main Uses
Basement	Carpark
G/F	Shop and services, lobby, E&M, landscape area, car parking, L/UL bays
1/F-17/F	Office

- 1.4 The run-in/out point of the proposed development is located at the San Yick Lane (**Drawing A-1**). The floor plans and section plan of the proposed development submitted by the applicant are at **Drawings A-1 to A-4**. The proposed development is anticipated to be completed by the end of 2019.
- 1.5 In support of the application, the applicant submitted the following documents:
 - (a) Application form received on 4.12.2017 (Appendix I)
 - (b) Supplementary Planning statement (Appendix Ia)
 - (c) Applicant's letter dated 4.12.2017 providing clarifications on number of storeys of the proposed development and replacement pages of executive summary (Appendix Ib)
 - (d) Further Information (FI) dated 12.1.2018 (Appendix Ic) providing responses to departmental comments with sewerage impact assessment (SIA) and environmental assessment (EA)
 - (e) FI dated 6.2.2018 providing responses to departmental comments with pedestrian flow

survey and pedestrian level of service (LOS) assessment

- (f) FI dated 12.2.2018 providing responses to comments of Drainage Services Department (DSD)

 (Appendix Ie)
- (g) FI dated 14.2.2018 providing replacement page (Appendix If) of FI dated 12.2.2018
- (h) FI dated 22.2.2018 providing responses to comments of Transport Department (TD) and Environmental Protection Department (EPD)

2. <u>Justifications from the Applicant</u>

The justifications put forth by the applicant in support of the application are detailed in Section 6 of the planning statement (**Appendix Ia**). They can be summarised as follows:

- (a) The Site is at a suitable location for office development. The proposed development is at the corner site between two industrial zones, i.e. Areas 9 and 12. The corner site location allows the proposed development not only to avoid generating any interface problems with other existing and/or future industrial operations nearby, but also to improve these two industrial zones to meet the economic development needs of today and in the coming future in terms of diversity and competitiveness. Moreover, the Site enjoys extremely high vehicular and pedestrian accessibilities as it is in close proximity to many public transport facilities which connect it to many populated residential clusters within 1 to 2 km radius (**Drawing A-5**).
- (b) The application is in line with the Town Planning Board Guidelines on Use/Development within "Industrial" Zone (TPB PG-No. 25D). The 2014 Area Assessments has indicated that the floor area used by office in Areas 9 and 12 was increased from 65,537m² in 2005 to 142,505m² in 2008 and then dropped to 89,565m² in 2014. It should be noted that the decrease in floor area in office use in 2014 was due to rezoning part of the industrial land to "Comprehensive Development Area" ("CDA"), "Other Specified Uses" annotated "Business" ("OU(B)") or "Commercial" ("C") zones. This clearly indicates that the demand for office space in these two industrial areas was great. Besides, office activities are now widely spread over many existing industrial buildings in Areas 9 and 12. There is no doubt a shortfall in the provision of properly designed office floor space to serve the industries in the area.
- (c) The proposed 'Office' and 'Shop and Services (Ground Floor)' uses are in line with general planning intention of the subject "I" zone. Five similar planning applications were approved by the Board within the two industrial zones. Moreover, the proposed development will not jeopardise the long-term land-use planning in this part of the Tuen Mun industrial area. The approval of the present application would only be for the lifetime of the proposed development.

- (d) The Traffic Impact Assessment (TIA) has demonstrated that the proposed development will not generate any adverse traffic impact on the local road system and the adjoining pedestrian footpath. The provision of internal parking and L/UL facilities is adequate to cater for the needs of the whole development.
- (e) The application would attract existing and potential local working population to work within the same district. The Site enjoys extremely high vehicular and pedestrian accessibilities. It is well served by and is located in close proximity to many public transport facilities in the area. The approval of this application will definitely provide additional white-collar job opportunities in Tuen Mun.

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. Town Planning Board Guidelines

The Town Planning Board Guidelines on Use/Development within "I" Zone (TPB PG-No. 25D) (**Appendix II**) is relevant to this application. For a proposed development of office building, the following main planning criteria are relevant:

- (a) Any proposal for the development of office building should demonstrate that there is a shortfall in the provision of office and other commercial floor space to serve the industrial activities in the area, and there are no suitable alternative sites to accommodate the proposed office building in the vicinity.
- (b) The location of the proposed office building should be easily accessible to public transport facilities, in particular railway stations, to minimize the potential traffic generation.
- (c) Favourable consideration may be given to proposed office development on sites within the part of an industrial area requiring renewal or restructuring, and the proposed development will induce significant improvement to the general amenity and environment of the area, or will alleviate existing interface problems by providing an environmental buffer between existing industrial and residential or other environmentally sensitive uses, such as school and community facilities.
- (d) There should be an adequate provision of parking and loading/unloading facilities within the site in accordance with the Hong Kong Planning Standards and Guidelines (HKPSG) and to the satisfaction of the Transport Department.

5. Background

5.1 In view of the concern on the utilisation of the industrial buildings in the territory as well as the changing needs of the industrial and business sectors, Planning Department conducted the first Area Assessments of Industrial Land in the Territory in 2000 (2000 Area Assessments). Since then, the Area

Assessments have been updated in 2005, 2009 and 2014 respectively.

- 5.2 On 14.8.2015, the Board noted the findings, key observations and recommendations of the 2014 Area Assessments. As stated in the 2014 Area Assessments, there is a continued genuine need for "I" zone for the wide range of economic activities from traditional industrial uses to other industrial-related services/office uses; and floor space for appropriate types of activities in "I" zone should be retained in different areas to help achieve a better balance in the distribution of population and employment.
- Industrial area in Tuen Mun is mainly located in Areas 9, 12 and 16 in Tuen Mun Central. According to the 2014 Area Assessments, the total area of "I" zone in the Tuen Mun Areas 9, 12 and 16 has decreased from about 39.33ha to 29.61ha (-9.72ha) as compared with the last round of exercise (i.e. 2009 Area Assessments). The decrease included rezoning areas from "I" in Area 9 (about 9.65ha) to "CDA", "OU(B)" and "C" zones in March 2012 which was based on the recommendations in the 2009 Area Assessments and one "I" site in Area 12 (about 0.07ha) was rezoned to "C" in May 2014 according to the Board's approval to a section 12A application in March 2013.

6. <u>Previous Application</u>

The Site is not the subject of any previous application.

7. Similar Applications

- 7.1 Since the promulgation of new policy measures to encourage wholesale conversion of old industrial buildings in 2010, there are nine similar applications for wholesale conversion for the lifetime of the building within the same "I" zone in Area 12 of Tuen Mun (Application Nos. A/TM/403, 413, 420, 424, 464, 478, 481, 482 and 483). These applications were approved with conditions on 18.3.2011, 20.5.2011, 19.8.2011, 20.1.2012, 19.6.2015, 20.11.2015, 5.2.2016 and 8.1.2016 by the Committee respectively.
- 7.2 These applications were for wholesale conversion of existing industrial building into commercial uses including office with or without shop and services/eating place or private club. They were approved mainly on grounds including that the proposed uses not incompatible with the adjacent land uses; the development meeting TPB PG-No. 25D; the development meeting the Government policy to encourage the conversion of industrial buildings introduced in 2010; and the proposed use not having adverse traffic and / or environmental impacts. Details of these applications are summarised in **Appendix III** and the location of the sites are shown on **Plan A-1**.

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

8.1 The Site is:

- (a) previously occupied by three industrial buildings which had been demolished in 2017; and
- (b) currently a construction site fenced with hoarding.
- 8.2 The surrounding areas have the following characteristics:
 - (a) it is within the existing Tuen Mun Industrial Area 12 which is predominantly occupied by industrial buildings with six sites zoned "C(1)", "Open Space" ("O") and "Government, Institution or Community" ("G/IC") in the central part of the Area;
 - (b) to its north and west is Pui To Road and Tsing Wun Road respectively. Two industrial buildings, namely Tuen Mun Industrial Centre and Tung Ming Industrial Building, are to the east and south respectively. San Yick Lane is located to the south of the Site
 - (c) to its north across Pui To Road is Tuen Mun Industrial Area 9 with a cluster of industrial buildings with some GIC facilities. Twelves sites to the further northeast of the Site in Area 9 were rezoned from "I" to "CDA", "OU(B)" and "C" in 2012; and
 - (d) to its west across Tsing Wun Road is Yeung Siu Hang Garden zoned "O". A public housing estate, Shan King Estate, is located to further northwest.

9. **Planning Intention**

The planning intention of the "I" zone is primarily for general industrial uses to ensure an adequate supply of industrial floor space to meet demand from production-oriented industries. Information technology and telecommunications industries and office related to industrial use are also always permitted in this zone.

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:

Trade and Industry

- 10.1.1 Comments of the Director-General of Trade and Industry (DG of TI):
 - (a) He has reservation on the application.
 - (b) In view of the shortfall of industrial land as revealed in the 2014 Area Assessments of Industrial Land in the Territory ('2014 Area Assessments') and its recommendation to retain the area where the Site is located as "I" zone in view of the low and decreasing vacancy of the industrial buildings in the area and their high usage for industrial use, he considers that sufficient floor space

will need to be provided for industrial activities. He is concerned that the approval of the subject application would lead to further depletion of industrial floor space when the proposed development is materialised.

Land Administration

- 10.1.2 Comments of the District Lands Officer/Tuen Mun, Lands Department (DLO/TM, LandsD):
 - (a) The subject Site is within Tuen Mun Town Lot No. 75 ('the Lot') which is held under New Grant No. 2135 ('New Grant'). The Lot is subject to the following salient lease conditions:
 - (i) user: industrial or godown purposes or both (excluding any offensive trade); and
 - (ii) type of building: erection of a factory or factories or a warehouse or warehouses or both, ancillary offices, and caretakers' or watchmen's quarters.
 - (b) The proposed 'Office' cum 'Shop and Services (Ground Floor only)' uses of the Lot do not comply with the lease conditions. If planning approval is given by the Town Planning Board, the applicant will need to apply to the LandsD for a lease modification or land exchange for the above proposal. The proposal will only be considered upon receipt of formal application from the applicant. There is no guarantee that the application, if received by LandsD, will be approved and he reserves his comment on such. The application will be considered by LandsD 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, among others, charging of premium and administrative fee.

Traffic

- 10.1.3 Comments of the Commissioner for Transport (C for T):
 - (a) He has no comment on the application from traffic engineering point of view.
 - (b) An approval condition on the design and provision of parking facilities and loading/unloading spaces for the proposed development may be imposed.
- 10.1.4 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW of HyD):
 - (a) The proposed access arrangement of the application site should

be commented by TD.

- (b) If the proposed run-in is agreed by TD, the applicant should provide a run-in/out at the access point 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 existing adjacent pavement.
- (c) Existing road gully, if any, to be affected by the proposed run-in should also be relocated away from the run-in to the satisfaction of HyD. In this connection, the applicant shall submit the works proposals to HyD. Please also remind the applicant that no works shall start until the works proposal is accepted by HyD and an excavation permit is obtained from HyD.
- (d) Adequate drainage measures should be provided to prevent surface water running from the site to the nearby public roads and drains.

Environment

- 10.1.5 Comments of the Director of Environmental Protection (DEP):
 - (a) According to the FI (**Appendix Ic**), the proposed development is to be equipped with central air conditioning and would not rely on open windows for ventilation, as such no adverse noise impact is expected.
 - (b) He has no adverse comments from the sewerage planning perspective. The Sewerage Impact Assessment concluded that there is adequate capacity at the public sewerage network for the proposed development.
 - (c) Having considered the FI (**Appendix Ig**), he has no objection to the application from air quality perspective.

Urban Design and Visual

- 10.1.6 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):
 - (a) He has no particular comment on the application.
 - (b) The Site is bounded by Pui To Road to the north, Tsing Wun Road to the west, Tuen Mun Industrial Centre (59mPD) and Tuen Mun Industrial building (36mPD) to the immediate east and south.
 - (c) The proposed office building of 84.95mPD and PR of 9.49 (by calculation) complies with the development parameters stipulated in the Notes for the "Industrial" ("I") zone on the prevailing draft Tuen Mun OZP No. S/TM/34, significant adverse visual impact

is not anticipated.

Landscape

- 10.1.7 Comments of CTP/UD&L, PlanD:
 - (a) He has no objection to the application.
 - (b) The Site is located at the corner of Tsing Wun Road and Pui To Road within an area zoned "Industrial" ("I") on the draft Tuen Mun OZP No. S/TM/34. The application is seeking approval for 'Office' cum 'Shop and Services (ground floor only)' at the Site.
 - (c) With reference to the submitted information, it is noted that the Site is currently vacant for construction with some existing trees abutting its north and west. Significant landscape impact arising from the proposed development is not anticipated.
 - (d) the site coverage of greenery should also follow the requirements as stipulated in APP PNAP-152 and/or lease.

Drainage

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

He has no objection to the application from public sewerage viewpoint subject to approval condition to be imposed to request the applicant to submit a further Sewerage Impact Assessment to review the actual site conditions. The applicant should be responsible for any proposed upgrading works according to the existing and planned sewage flow estimation.

Fire Safety

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

He has no objection in-principle to the application provided that:

- (a) The development will be wholly converted to office cum shop and services building; and
- (b) Fire service installations will be provided to the satisfaction of his Department. Detailed fire safety requirements will be formulated upon receipt of formal submission of general building plans.

Building Matters

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

- (a) Carparking spaces, loading & unloading lay-by may be disregarded from GFA subject to the compliance with the requirements in PNAP APP-2 & 111, otherwise, it will be counted as non-domestic GFA. For the carpark installed with a double-deck carparking system, the applicant should provide justifications for GFA exemption for using double-deck carparking system in any new development during building plan submission stage in accordance with PNAP APP-2.
- (b) It is noted that the latest approved building plans for the Site is for an industrial building with no proposed office in the upper floors nor proposed shops on G/F. Before any building works are to be carried out on the Site, prior approval and consent of the BD should be obtained, otherwise they are unauthorised building works.
- (c) Detailed comments under the Buildings Ordinance will be provided at the building plan submission stage.

Others

10.1.11 Comments of the Director of Electrical and Mechanical Services (DEMS):

He has no particular comment on the application from electricity supply safety aspect. However, in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organising and supervising any activity near the underground cable or overhead line under the application should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans (and overhead line alignment drawings, where applicable) to find out whether there is any underground cable and/or overhead line within and/or in the vicinity of the Site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the "Code of Practice on Working near Electricity Supply Lines" established under the Regulation when carrying out works in the vicinity of the electricity supply lines.

District Officer's Comments

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

She had distributed consultation letters to the locals concerned and understood that they would provide their comments (if any) to the Board direct.

- 10.2 The following Government departments have no objection/no comment on the application:
 - (a) Commissioner of Police (C of P);
 - (b) Director of Leisure and Cultural Services (DLCS);

- (c) Director of Food and Environmental Hygiene (DFEH);
- (d) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and
- (e) Project Manager (West), West Development Office, Civil Engineering and Development Department.

11. Public Comments Received During Statutory Publication Period

The application and the subsequent FI submitted by the applicant were published for public inspection on 11.12.2017 and 19.1.2018 respectively. During the first three weeks of the statutory public inspection period which ended on 2.1.2018 and 9.2.2018, a total of eight public comments were received. All of the comments support the application, for reasons that the proposed development can meet the demand for office space in Tuen Mun, attract businesses and create job opportunities, enable residents to work within the same district, reduce the nuisance caused by the storage nearby, alleviate traffic congestion and reduce air and noise pollution.

12. Planning Considerations and Assessments

- 12.1 The planning intention of the "I" zone is primarily for general industrial uses to ensure an adequate supply of industrial floor space to meet demand from production-oriented industries. Information technology and telecommunications industries and office related to industrial use are also always permitted in this zone.
- 12.2 The Site is located on the western edge of Tuen Mun Area 12 which comprises a cluster of industrial buildings, some GIC facilities and open space. To its west across Tsing Wun Road is an open space, namely Yeung Siu Hang Garden, and Shan King Estate (**Plans A-1** and **A-2**). The proposed development with 'Office' and 'Shop and Services' is considered not incompatible with the surrounding land uses.
- 12.3 According to the 2014 Area Assessments, Tuen Mun Areas 9 and 12, where the Site is located, was recommended to be retained as an "I" zone. Given that there are active industrial activities in the subject area, the proposed commercial development which would reduce the amount of floor space available for industrial use, is not in line with the planning intention of the "I" zone. In this regard, DG of TI has reservation on the application as the proposed development would lead to depletion of industrial floor space. There is no strong planning justification in the current application for a departure from the planning intention.
- 12.4 The proposed development is not in line with TPB PG-No. 25D in that there is no evidence to proof that there is a shortfall in the provision of office and other commercial floor space to serve the industrial activities in the area. In this regard, there are areas zoned "OU(B)" (about 3.64 ha) and "C" (about 0.55 ha) to the northeast and southeast of the Site in Areas 9 and 12 for meeting the demand of commercial activities. The applicant fails to demonstrate that there are no suitable alternative sites to accommodate office/ commercial building in the vicinity.

- 12.5 For the similar applications approved between 2011 and 2016, they were all for wholesale conversion for the lifetime of existing industrial buildings, under the policy measures introduced by the Government in 2010 to encourage the wholesale conversion of vacant or under-utilised industrial buildings to meet the social and economic needs of Hong Kong. The current application is for a new commercial development.
- 12.6 Eight public comments in support / favour of the application mainly on the grounds of meeting demand for office space, creation of job and business opportunities, enabling residents to work within the same district and alleviation of traffic congestion and pollution are noted. The planning assessment and considerations in paragraphs 12.2 to 12.5 above are relevant.

13. Planning Department's Views

- 13.1 Based on the assessments made in paragraph 12 above and having taken into account the public comments mentioned in paragraph 11, the Planning Department does not support the application for the following reasons:
 - (a) the proposed development is not in line with the planning intention of the "Industrial" ("I") zone, which is primarily for general industrial uses to ensure an adequate supply of industrial floor space to meet demand from production-oriented industries. There are active industrial activities within the area where the Site is located, and the 2014 Area Assessments of Industrial Land in the Territory has recommended retaining the "I" zoning of the subject area. There is no strong planning justification in the submission for a departure from the planning intention; and
 - (b) the proposed development is not in line with Town Planning Board Guidelines No. 25D in that the applicant fails to provide information to demonstrate that there is a shortfall in the provision of office and other commercial floor space to serve the industrial activities in the area; and there is no proof that suitable alternative sites are not available to accommodate the proposed office development in the vicinity.
- 13.2 Alternatively, should the Committee decide to approve the application, it is suggested that the permission shall be valid until <u>2.3.2022</u>, 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 conditions

(a) the submission of a Sewerage Impact Assessment to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;

- (b) the implementation of the local sewerage upgrading/sewerage connection works identified in planning condition (a) above to the satisfaction of the Director of Drainage Services or of the Town Planning Board;
- (c) the design and provision of fire service installations and water supply for fire fighting to the satisfaction of the Director of Fire Services or of the Town Planning Board; and
- (d) the design and provision of parking facilities and loading/unloading spaces for the proposed development to the satisfaction of the Commissioner for Transport or of the Town Planning Board.

Advisory clauses

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

14. <u>Decision Sought</u>

- 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 condition(s) and advisory clause(s), 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

Drawings A-1 to A-3

Drawing A-4

Appendix I Appendix Ia	Application Form with attachments received on 4.12.2017 Supplementary Planning statement with Traffic Impact Assessment (TIA) Report
Appendix Ib	Applicant's letter dated 4.12.2017
Appendix Ic	FI dated 12.1.2018
Appendix Id	FI dated 6.2.2018
Appendix Ie	FI dated 12.2.2018
Appendix If	FI dated 14.2.2018
Appendix Ig	FI dated 22.2.2018
Appendix II	Town Planning Board Guidelines on Use/Development within "I" Zone (TPB PG-No. 25D)
Appendix III	Details of Similar Applications
Appendix IV	Public comments received during the statutory publication period
Appendix V	Advisory clauses

Floor Plans submitted by the applicant

Section Plan submitted by the applicant

Plan indicating the existing uses in the vicinity of the Site submitted by the applicant **Drawing A-5**

Plan A-1 Location Plan Site Plan Plan A-2 Plan A-3 Aerial Photo Plans A-4a and A-4b Site Photos

PLANNING DEPARTMENT **MARCH 2018**