

TPB Paper No. 10621
For Consideration by
the Town Planning Board
on ~~31.1~~13.3.2020

REVIEW OF APPLICATION NO. A/YL-NTM/391
UNDER SECTION 17 OF THE TOWN PLANNING ORDINANCE

**Filling of Land and Filling of Pond for Permitted Agricultural Use in “Green Belt” Zone
at Lots 232 (Part), 233 (Part), 234 (Part), 235 (Part) and 236 RP (Part) in D.D. 104,
and Adjoining Government Land (GL), Ngau Tam Mei, Yuen Long**

1. Background

- 1.1 On 3.7.2019, the applicant, Nice Trend Development Ltd., sought planning permission for filling of land and filling of pond for permitted agricultural use (fish farming) at the application site (the Site) (**Plan R-1**) under s.16 of the Town Planning Ordinance (the Ordinance). The proposal involves filling a land area of 1,864m² and pond area of 2,062m² with a layer of concrete of 0.1m deep to facilitate fish farming operation. The Site falls within an area zoned “Green Belt” (“GB”) on the approved Ngau Tam Mei Outline Zoning Plan (OZP) No. S/YL-NTM/12.
- 1.2 On 18.10.2019, the Rural and New Town Planning Committee (RNTPC) of the Town Planning Board (the Board) decided to reject the application for the following reasons:
 - (a) the application is not in line with the planning intention of the “GB” zone and the TPB PG-No. 10 for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance in that the applied filling of land and filling of pond, which have been completed, involve clearance of natural vegetation and reduction of pond area, thereby adversely affecting the natural landscape; and
 - (b) the approval of the application will set an undesirable precedent for similar applications within the “GB” zone. The cumulative effect of approving such similar applications would result in a general degradation of the environment of the area.
- 1.3 For Members’ reference, the following documents are attached:
 - (a) RNTPC Paper No. A/YL-NTM/391A (Annex A)
 - (b) Extract of minutes of the RNTPC meeting held on 18.10.2019 (Annex B)
 - (c) Secretary of the Board’s letter dated 1.11.2019 (Annex C)
- 1.4 The Site is subject to planning enforcement action against unauthorized development involving filling of land (**Plan R-2**) with Enforcement Notice (EN) issued on 22.11.2018 requiring discontinuation of land filling by 6.12.2018. Reinstatement Notice (RN) was subsequently issued on 10.6.2019 requiring the

reinstatement of the Site, i.e. to remove the fill materials (including hard paving) on the whole Site and to grass the Site with exception of the pond area. As the Site has not been reinstated upon expiry of the RN, prosecution action may be followed.

2. Application for Review

2.1 On 12.11.2019, the applicant applied, under section 17(1) of the Ordinance, for a review of the RNTPC's decision to reject the application (**Annex D**). In support of the review application, the applicant submitted written justifications on 25.11.2019 (**Annex E**) and further information (FI) on 6.1.2020 and 8.1.2020 (**Annex F**).

2.2 *In light of the special work arrangement for government departments due to the novel coronavirus infection, the meeting originally scheduled for 31.1.2020 for consideration of the review application has been rescheduled, and the Board has agreed to adjourn consideration of the application. The review application is now scheduled for consideration by the Board at this meeting.*

3. Justifications from the Applicant

The summary of justifications put forth by the applicant in support of the s.16 application is detailed in paragraph 2 of **Annex A**. To support the review application, the applicant provided additional justifications (**Annex E**) and FI (**Annex F**) and are summarized as follows:

The Unauthorized Development (UD) is Not Intended

- (a) The applicant indicated that he did not intentionally undertake unauthorized pond/land filling works at the Site. He was not aware that his works were UD until he received the EN from the Planning Department (PlanD). His primary intention for undertaking the land/pond filling works was to improve the site condition for modern fish farming. He was ignorant of the planning system and unaware/uninformed of the possible violation of the Town Planning Ordinance. Should he know it and be warned earlier, he would have stopped the works in time.
- (b) The applicant has heavily invested in the works and is unable to reinstate the ponds. He is willing to undertake remedial measures and hopes that sympathetic consideration could be given to his application.
- (c) The ponds within the Site are not natural ponds but were excavated by villagers decades ago. The adjacent ponds have been abandoned and subsequently covered with natural vegetation. The reinforcement and beautification works by filling up a thin layer of concrete should not be considered as UD.
- (d) Regarding the comments from District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD), the applicant would apply for Short Term Tenancy (STT) to regularize the unlawful occupation of GL. If, however, LandsD does not approve the granting of STT, the applicant is willing to exclude GL from the Site (except for the pond area). Application for STT for other structures including lavatory, containers and shading sheds within the Site would be made.

Need for Modern Fish Farming

- (e) The Site is used as genuine fish farm. Filling of land with a layer of concrete of 0.05 to 0.1m is to prevent overgrowing of vegetation and accumulation of water for regulating water quality of the ponds for modern fish farming. Operation of fish farm at the Site is an active response to Government's prevailing agriculture policy in promoting local agriculture.
- (f) Earthen ponds cannot cater for the requirements of modern fish farming methods. Besides, the ponds have not been totally filled up as commented by the Director of Agriculture, Fisheries and Conservation (DAFC). Only the bottom parts of the ponds have been filled with thin concrete for better water quality control. To address DAFC's concern on reduction in pond surface area, three filter tanks with a total water surface area of about 120m² will be placed adjacent to the ponds (**Drawing R-1**). The current pond surface area is similar to that before the filling works and the water surface area including the proposed filter tanks area is actually larger than before.

No Adverse Impacts

- (g) No adverse landscape and drainage impacts on the surrounding areas nor noise are anticipated. Considering the relatively small site area of the fish farm, its operation would not adversely affect the birds in the surrounding areas.
- (h) The filling works only involved clearance of a few short trees and vegetation, and six full-grown trees near the ponds have been retained. As compensation, he is willing to plant more trees at the periphery of the fish farms or on the adjoining GL if required by relevant Government departments.
- (i) The fish farm at the Site has been operating for two years and has not caused any inconvenience or nuisance to neighbouring residents. There are no objecting comments received from any adjacent residents during the statutory publication period of the planning application.

4. The Section 16 Application

The Site and Its Surrounding Areas (**Plans R-1 to R-2**, aerial photos on **Plans R-3a to R-3b** and site photos on **Plans R-4a to R-4b**)

- 4.1 The situation of the Site and its surrounding areas at the time of consideration of the s.16 application by the RNTPC is described in paragraph 8 of **Annex A**. There has not been any major change in planning circumstances of the area since then.
- 4.2 The Site is:
 - (a) filled and paved, and currently used for fish farming without planning permission granted for filling of land/pond; and
 - (b) accessible via a footpath leading to Ngau Tam Mei Road.

- 4.3 The surrounding areas have the following characteristics:
- (a) to its east are unused land, agricultural land, fish farm and ponds;
 - (b) to the south are ponds, residential structures and unused land; and further south are fish farm and agricultural land;
 - (c) to its west are vacant land, chicken farm, unused land and residential structures; and
 - (d) to its north are temporary structures intermixed with some residential dwellings, a temple and unused land.

Planning Intention

- 4.4 There has been no change of the planning intention of the “GB” zone, which is mentioned in paragraph 9 of **Annex A**.
- 4.5 The planning intention of the “GB” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.

Town Planning Board Guidelines

- 4.6 Town Planning Board Guidelines No. 10 (TPB PG-No. 10) for ‘Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance’ is relevant to this application. The relevant assessment criteria are summarized as below:
- (a) There is a general presumption against development (other than redevelopment) in a “GB” zone.
 - (b) An application for new development in a “GB” zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds.
 - (c) The design and layout of any proposed development should be compatible with the surrounding area. The development should not involve extensive clearance of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact on the surrounding environment.
 - (d) The proposed development should not overstrain the capacity of existing and planned infrastructure such as sewerage, roads and water supply. It should not adversely affect drainage or aggravate flooding in the area.
 - (e) The proposed development should not be susceptible to adverse environmental effects from pollution sources nearby such as traffic noise, unless adequate mitigating measures are provided, and it should not itself be the source of pollution.

Previous and Similar Applications

- 4.7 There were no previous application covering the Site and no similar application within the same “GB” zone at the time of consideration of s.16 application by the RNTPC. Since then, no additional previous or similar application is involved.

5. Comments from Relevant Government Departments

- 5.1 Comments on the s.16 application made by relevant Government departments are stated in paragraph 10 of **Annex A**.

- 5.2 For the review application, the following Government departments have been further consulted and their comments are summarized as follows:

Land Administration

5.2.1 Comments of the DLO/YL, LandsD:

- (a) He maintains his views that no consideration of regularization would be given to those unlawful occupation of unleased land. No permission is given for occupation of GL of about 823m² in area (subject to verification) included in the Site. The act of occupation of GL without Government’s prior approval is not allowed.
- (b) According to the aerial photo record, new occupation and erection of structures was found on both GL and private land after 28.3.2017. It is noted that the applicant proposed to partially exclude the GL. However, LandsD will not consider such regularization application even though approval of the Board is given.
- (c) The Site comprises Old Schedule Agricultural Lots 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.
- (d) The Site is accessible from Ngau Tam Mei Road through both the GL and private land. His office provides no maintenance work for the GL involved and does not guarantee any right-of-way to the Site.
- (e) The Site does not fall within Shek Kong Airfield Height Restriction Area.
- (f) Should planning approval be given to the application, the applicant has to apply for a formal approval prior to the actual occupation of the remaining GL. Moreover, lot owner(s) without Short Term Waiver (STW) will need to apply to his office to permit the structures to be erected or regularize any irregularities on site, if any. The applicant has to exclude the GL from the Site. 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. Applications for any of the above will be considered by LandsD acting in the capacity of the landlord or lessor at its sole discretion and there is no guarantee that such application will be approved. If such application 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 LandsD.

Traffic

5.2.2 Comments of the Commissioner for Transport (C for T):

There would be no vehicular access proposed to the Site and considering the traffic flow for the Site would be negligible, he has no comment from traffic engineering point of view.

Environment

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

- (a) He has no comment on the review application and maintains his previous views on the application. It is noted that the reasons for rejecting the s.16 application are not related to environmental considerations.
- (b) According to the applicant, the filling work is intended to restore two abandoned ponds for permitted agricultural use (fish pond culture) in “GB” zone. He has no adverse comment on the application. It is noted from the application that no imported waste material would be involved in the pond filling.
- (c) No environmental complaint pertaining to the Site has been received over the past 3 years.

Nature Conservation and Fish Culture

5.2.4 Comments of the DAFC:

- (a) He remains his reservation on the application and has no further comment on the justifications provided by the applicant in support of the review application. Pond filling with a reduction of original pond surface area is not recommended from fisheries point of view.
- (b) The Site is zoned “GB” on the Ngau Tam Mei OZP. According to the applicant, land filling was conducted at the periphery of the two ponds for provision of internal access, and filling of pond was conducted to reinforce the entire pond (including the bunds and bottom). Their site inspection in April 2019 revealed that one pond (the southern one) had been completely filled with concrete

and turned into a fish farm in which temporary containers/plastic pools had been placed for keeping different kinds of food fish. The northern pond was reinforced with concrete. They believe that the concrete reinforcement has caused reduction in area and depth of the pond. The reinforced pond was being used for food fish culture at the time of inspection.

- (c) From fisheries perspective, both earthen or concrete ponds can be used for fish culture. However, any pond filling or pond maintenance works causing a reduction of pond surface area is not recommended.
- (d) From nature conservation perspective, compared with a concreted pond, an earthen pond provides a more complete ecosystem for the pond habitat, for instance by allowing different kinds of aquatic organisms to live therein. Earthen pond bund also serves as a habitat for water birds to rest and forage. Pond filling is not supported from nature conservation perspective as it results in wetland loss. As such, she has reservation on the application from nature conservation point of view.
- (e) The applicant should consult and apply to the relevant departments for approval before carrying out any filling work at the Site.

Fire Safety

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

- (a) He has no objection in principle to the application.
- (b) The application only involves filling of land/pond for permitted agricultural use, but not the erection of structure at the Site. In this regard, he has no specific comment on the application.

Landscaping

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

- (a) He maintains no objection to the review application from landscape planning perspective as further significant adverse landscape impact arising from the applied use is not anticipated.
- (b) The Site, located to the east of Ngau Tam Mei and west of Ngau Tam Mei Water Treatment Works, falls within an area zoned “GB” on the approved Ngau Tam Mei OZP No. S/YL-NTM/12. The Site is not covered by any previous planning application.
- (c) With reference to the aerial photo of 2018, the surrounding area of the Site is comprised of mainly ponds with scattered temporary structures and clustered tree groups. Similar land use can be found

in close proximity of the Site. The proposed use is considered not incompatible with the existing landscape setting in proximity.

- (d) Based on their site visit conducted on 19.7.2019, the Site had been fenced off and the proposed development was in place. No existing vegetation was observed within the Site.
- (e) In view that there is no prominent public frontage around the Site, should the review application be approved, landscape condition in the planning permission is not recommended as its effect on enhancing the quality of public realm is not apparent.

5.3 The following Government departments have no further comment on the review application and maintain their previous views on the s.16 application (**Annex A**). Their views are recapitulated as follows:

Traffic

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

- (a) HyD is not/shall not be responsible for the maintenance of the proposed access to the Site. Presumably, the relevant department will provide their comments to the applicant, if any.
- (b) Adequate drainage measures should be provided at the Site access to prevent surface water flowing from the Site to the nearby public roads or exclusive road drains.

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

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

Drainage

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

- (a) He has no objection in principle to the proposed development from public drainage point of view.
- (b) Should the application be approved, conditions should be included to request the applicant (i) to submit a drainage proposal to advise if there is any change of the runoff pattern as a result of the development and demonstrate how the existing flow paths as well as the run-off falling onto and passing through the Site could be intercepted and disposed of via proper discharge points, and (ii) to

implement the drainage proposal for the development to the satisfaction of the Director of Drainage Services or of the Board.

Building Matters

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

- (a) There is no record of approval by the Buildings Authority for the existing structures at the Site and his department is not in a position to offer comments on their suitability for the use proposed in the application.
- (b) His detailed comments are at **Annex H**.

Others

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

For any waste generated from the commercial/trading activities, the applicant should arrange disposal properly/handle on his own/at his own expenses.

District Officer's Comments

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

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

5.4 The following Government departments have no further comment on the review application and maintain their previous views of having no comment on the application as stated in paragraph 10.2 of **Annex A**:

- (a) Commissioner of Police;
- (b) Chief Engineer/Construction, Water Supplies Department;
- (c) Director of Leisure and Cultural Services;
- (d) Director of Electrical and Mechanical Services;
- (e) Head of the Geotechnical Engineering Office, Civil Engineering and Development Department; and
- (f) Project Manager (West), Civil Engineering and Development Department.

6. Public Comments Received During Statutory Publication Period

6.1 On 29.11.2019, the review application was published for public inspection. During the first three weeks of the statutory public inspection period, 5 public comments were received from World Wide Fund for Nature Hong Kong, Kadoorie Farm & Botanic Garden Corporation, Hong Kong Bird Watching Society, San Tin Rural Committee, and a member of the public (**Annex G**)

objecting to the application. They were concerned that the applied use was not in line with the planning intention of “GB” zone, had inappropriately occupied GL for private use, the approval of the application would legitimize the UD and set undesirable precedent, that the rural character of the Site should be preserved, and adverse visual and ecological impacts were anticipated.

- 6.2 At the s.16 application stage, 5 objecting comments from World Wide Fund for Nature Hong Kong, Kadoorie Farm & Botanic Garden Corporation, Designing Hong Kong, Hong Kong Bird Watching Society and a member of the public were received raising similar concerns. Details of the comments are in paragraph 11 of **Annex A**.

7. Planning Considerations and Assessments

- 7.1 The application is for a review of the RNTPC’s decision on 18.10.2019 to reject the application for filling of land and filling of pond for permitted agricultural use (fish farming) at the Site which is zoned “GB”. The rejection reasons were that the application was not in line with the planning intention of the “GB” zone and the TPB PG-No. 10, and the approval of the application would set an undesirable precedent for similar applications within the “GB” zone.
- 7.2 In support of the review application, the applicant has provided further justifications stating that the UD at the Site was unintentional and it was mainly because he was ignorant of and not familiar with the planning system. He requested that sympathetic consideration be given to his application as he had heavily invested in the works and was unable to reinstate the ponds. He is willing to regularize unlawful occupation of GL through applying for STT or to exclude the GL from the Site (except for the pond area), plant more trees and construct filtration tanks so as to increase water surface. He explained that the filling works were mainly to control water quality to meet the requirements for modern fish farming; there were no adverse landscape and drainage impacts nor noise on the surrounding areas, and no inconvenience or nuisance caused to the neighbouring residents in the past two years.

Not in line with Planning Intention and TPB PG-No. 10

- 7.3 The planning intention of “GB” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone. According to the TPB PG-No. 10, development in the “GB” zone should not involve extensive clearance of existing natural vegetation and affect the existing natural landscape, adversely affect drainage or aggravate flooding and slope stability in the area. Whilst fish farming is always permitted within the “GB” zone, filling of land and filling of pond is subject to planning permission. However, land/pond filling has been carried out at the Site without planning permission for fish farming use. It is considered that the filling of land and pond at the Site is not in line with the planning intention of the “GB” zone and the TPB PG-No. 10 and the applicant has not provided strong planning justifications to merit a departure from the said planning intentions. The

applicant has occupied GL for the filling works. However, any regularization application for unlawful occupation of GL will not be considered by LandsD.

Impact on Natural Environment and Need for Pond/Land Filling for Fish Farming

- 7.4 The proposal involves filling a land area of 1,864 m² and pond area of 2,062 m² with a layer of concrete of 0.1m deep to facilitate fish farming operation. In essence, the filling of land and pond has covered the whole Site. The Site originally comprised two natural earthen ponds with more greenery. The southern pond had been completely filled with concrete and turned into a fish farm in which temporary containers/plastic pools had been placed for keeping different kinds of food fish. The northern pond was reinforced with concrete. As shown in the aerial photos taken in 2015 and 2018 (**Plans R-3a and R-3b**), the site condition has been substantially changed after the filling activities including clearance of natural vegetation and reduction in pond area.
- 7.5 Despite the applicant's explanation that earthen ponds could not meet the requirements of modern fish farming, it is noted that similar fish farming use is carried out at adjacent natural ponds. While noting that the ponds are used for fish culture purpose, DAFC is of the view that any pond filling or pond maintenance works causing a reduction of pond surface area is not recommended from fisheries perspective, and the applicant should consult and apply to the relevant departments for approval before carrying out any filling work at the Site. The concrete reinforcement of the entire pond (including the bunds and bottom) has resulted in reduction in pond area and depth. It is considered that the applicant has not provided strong justifications to support that the land/pond filling is necessary for fish farming use. The applicant's alleged need for undertaking modern fish farming cannot justify the land/pond filling activities at the Site which has caused irreversible impact to the natural environment.
- 7.6 DAFC maintains his reservation on the application from nature conservation point of view. As pointed out by DAFC, pond filling is not supported from nature conservation perspective as it results in wetland loss, and compared with a concreted pond, an earthen pond provides a more complete ecosystem for the pond habitat and earthen pond bund also serves as a habitat for water birds to rest and forage. Although the applicant claimed that the current pond surface area is similar to that before the filling works and the water surface area including the proposed filter tanks area will be actually larger than before, the original earthen pond area has been reduced.

Setting of Undesirable Precedent

- 7.7 There is no previous planning approval at the Site and in the subject "GB" zone on the OZP for land/pond filling for agricultural use, approval of the application would set an undesirable precedent for similar applications within the "GB" zone and the cumulative effect of which would result in general degradation of the environment of the area.
- 7.8 The Site is subject to planning enforcement action. EN was issued on 22.11.2018 requiring filling of land be discontinued. RN requiring the notice recipients to

remove the fill materials and to grass the Site (excluding pond area) has been issued on 10.6.2019 but has not been complied with. Approval of the application may encourage similar UD in the area.

Public Comments

- 7.9 At s.17 stage, there are five objecting public comments received raising concerns on the unauthorized use at the Site, inappropriate occupation of GL, incompatibility of the applied use with planning intention of “GB” zone, adverse visual and ecological impacts and setting of undesirable precedent (**Annex G**). The planning assessments and departmental comments above are of relevance.

8. Planning Department’s Views

- 8.1 Based on the assessments made in paragraph 7, having taken into account the public comments mentioned in paragraph 6 and given that there is no change in the planning circumstances since the consideration of the subject application by the RNTPC on 18.10.2019, the Planning Department maintains its previous view of not supporting the review application for the following reasons:
- (a) the application is not in line with the planning intention of the “GB” zone and the TPB PG-No. 10 for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance in that the applied filling of land and filling of pond, which have been completed, involve clearance of natural vegetation and reduction of pond area, thereby adversely affecting the natural landscape; and
 - (b) the approval of the application will set an undesirable precedent for similar applications within the “GB” zone. The cumulative effect of approving such similar applications would result in a general degradation of the environment of the area.
- 8.2 Alternatively, should the Board decide to approve the application, no time clause for commencement of development is proposed as the land and pond filling works under application have already been completed. The following conditions of approval and advisory clauses are also suggested for Members’ reference:

Approval conditions

- (a) the submission and implementation of the drainage proposal within 9 months to the satisfaction of the Director of Drainage Services or of the Town Planning Board by ~~31.10/3.12.2020~~; and
- (b) if the above planning condition (a) 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.

Advisory clauses

The recommended advisory clauses are attached at **Annex H**.

9. Decision Sought

- 9.1 The Board is invited to consider the application for a review of the RNTPC's decision and decide whether to accede to the application.
- 9.2 Should the Board decide to reject the review application, Members are invited to advise what reason(s) for rejection should be given to the applicant.
- 9.3 Alternatively, should the Board decide to approve the review application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission.

10. Attachments

Annex A	RNTPC Paper No. A/YL-NTM/391A
Annex B	Extract of minutes of the RNTPC meeting held on 18.10.2019
Annex C	Secretary of the Town Planning Board's letter dated 1.11.2019
Annex D	Email received on 12.11.2019 from the applicant applying for a review
Annex E	Supplementary information submitted on 25.11.2019
Annex F	FI received on 6.1.2020 and 8.1.2020
Annex G	Public Comments received during the Statutory Publication Period
Annex H	Recommended Advisory Clauses
Drawing R-1	Layout Plan
Plan R-1	Location Plan
Plan R-2	Site Plan
Plan R-3a	Aerial Photo taken in 2018
Plan R-3b	Aerial Photo taken in 2015
Plans R-4a and 4b	Site Photos

PLANNING DEPARTMENT
~~JANUARY~~MARCH 2020