RNTPC Paper No. A/YL-KTS/865A For Consideration by the Rural and New Town Planning Committee on 26.3.2021

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

APPLICATION NO. A/YL-KTS/865

<u>Applicant</u>	:	Funco Limited represented by Metro Planning & Development Company Limited
<u>Site</u>	:	Lots 447 RP (Part) and 448 (Part) in D.D. 106 and Adjoining Government Land, Kam Sheung Road, Kam Tin, Yuen Long
<u>Site Area</u>	:	About 4,186m ² (including Government Land of 191m ² (about 4.6%))
Lease	:	Block Government Lease (demised for agricultural use)
<u>Plan</u>	:	Approved Kam Tin South Outline Zoning Plan (OZP) No. S/YL-KTS/15
<u>Zoning</u>	:	"Other Specified Uses" annotated "Rural Use" ("OU(RU)") [Maximum plot ratio of 0.4 and maximum building height of 3 storeys (9m)]
<u>Application</u>	:	Temporary Open Storage of Construction Machinery, Construction Material, Vehicle and Vehicle Parts 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 temporary open storage of construction machinery, construction material, vehicle and vehicle parts for a period of 3 years. The Site is zoned "OU(RU)" on the Kam Tin South OZP, and the applied use is neither a Column 1 nor Column 2 use. According to the covering Notes of the OZP, temporary use or development not exceeding a period of three years requires planning permission from the Town Planning Board (the Board), notwithstanding that the use or development is not provided for in terms of the OZP. The Site is currently used for the applied use without planning permission (**Plans A-1b to A-4c**).
- 1.2 The Site is the subject of 11 previous applications for various temporary open storage uses. The last application No. A/YL-KTS/757 for renewal of planning permission for the same applied use as the current application was approved with conditions by the Rural and New Town Planning Committee (the Committee) on

24.11.2017. All the approval conditions have been complied with and the planning permission lapsed on 13.12.2020.

- 1.3 According to the applicant, seven structures with a building height of 3m (1 storey) and 6m (2 storeys) and a total floor area of about 630m² are provided for site office, guardroom, store room, and toilet within the Site. The operation hours are between 9 a.m. and 6 p.m. from Mondays to Saturdays. There is no operation on Sundays and public holidays. 3 private car parking spaces and 3 loading / unloading bays for light goods vehicles are provided within the Site, and operation of the development does not involve vehicles over 5.5 tonnes. The Site is accessible by Kam Sheung Road via a local track. The layout plan submitted by the applicant is at **Drawing A-1**.
- 1.4 Compared with the last approved application No. A/YL-KTS/757, the current application is for the same applied use submitted by a different applicant, with a slightly larger site area from 3,995m² to 4,186m² (+191m² / +4.8m²), changes to the internal layout, deleting one structure and reduction of GFA from 804m² to 630m² (-174m² / -21.6%), increasing in the number of parking spaces and loading / unloading spaces.
- 1.5 In support of the application, the applicant has submitted the following documents:

(a)	Application Form with plans received on 20.10.2020	(Appendix I)
(b)	Further Information (FI) received on 7.12.2020 in response to departmental comments*	(Appendix Ia)
(c)	FI received on 29.1.2021 in response to departmental comments*	(Appendix Ib)
(d)	FI received on 17.3.2021 providing clarification*	(Appendix Ic)

*exempted from publication requirement

1.6 On 18.12.2020, the Committee agreed to defer a decision on the application to allow time for the applicant to prepare FI to address departmental comments. After the deferral request, the applicant submitted FI in response to departmental comments. 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 application form and FI in **Appendix I** and **Ic**. They can be summarized as follows:

(a) The Site is subject to 11 previous planning applications for open storage use, and all the approval conditions of the last planning application had already been

complied with. While the applied use remains the same as the last approved application, the internal layout of the development has changed, thus necessitating a fresh planning application.

- (b) The proposed development is a temporary use which would not jeopardize the long term planning intention, and it is not incompatible with the surrounding environment. The planning circumstances of the Site is similar to the nearby open storage and port back-up uses applications recently approved.
- (c) No dismantling, maintenance, repairing, cleansing, paint spraying or other workshop activities will be carried out. The applicant will strictly comply with the Environmental Protection Department's (EPD) 'Code of Practice on Handling the Environmental Aspects of Temproary Uses and Open Storage Sites' (COP), and will place any materials which may leak oil or chemicals onto a non-slip heavy duty membrane and cover them with water-proof sheets to avoid soil contamination. Landscape and drainage proposals are submitted in support of the application. The proposed development will not result in adverse traffic, drainage and environmental impacts.

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

The applicant is the sole "current land owner" of the private land portion of the Site. Detailed information would be deposited at the meeting for Members' inspection. For the Government land portion, the requirements as set out in the Town Planning Board Guidelines on Satisfying the "Owner's Consent/Notification" Requirements under section 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) are not applicable.

4. <u>Town Planning Board Guidelines</u>

- 4.1 The Town Planning Board Guidelines on 'Application for Open Storage and Port Back-up Uses' (TPB PG-No.13F) promulgated by the Board on 27.3.2020 are relevant to this application. The Site falls within Category 3 areas under TPB PG-No. 13F. The relevant extract of the Guidelines is attached at **Appendix II**.
- 4.2 Town Planning Board Guidelines for "Designation of "Other Specified Uses" annotated "Rural Use" ("OU(RU)") Zone and Application For Development Within "OU(RU)" Zone under Section 16 of the Town Planning Ordinance" (TPB PG-No. 38) is relevant to the application. The relevant assessment criteria are summarized as follows:

Application for development within "OU(RU)" zone would need to demonstrate that the proposed development is in line with the planning intention of the zone and will not adversely affect the rural environment, the conservation of the rural landscape and the maintenance of the rural character of the area and its surroundings and will not overstrain the capacity of existing and planned infrastructure such as transport, drainage, sewerage and water supply in the area. Each development proposal will be assessed on its individual merits, with particular reference to its sustainability in ecological, environmental and infrastructural terms.

5. <u>Background</u>

The Site is not subject to active planning enforcement action.

6. <u>Previous Applications</u>

- 6.1 The Site is the subject of eleven previous applications for various temporary open storage uses, which were all approved with conditions by the Committee between 1998 and 2017 for a period of 1 to 3 years. Details of the applications are summarized in **Appendix III** and their locations are shown on **Plan A-1b**.
- 6.2 Applications No. A/YL-KTS/136, 204 and 220 for temporary open storage of vehicles/spare parts, construction machinery and/or bamboo and container trailer park were approved by the Committee for 2 to 3 years in 1998 and 2000. Application No. A/YL-KTS/136 was approved mainly on the considerations that the application was in line with the then TPB PG-No. 13 in that the development was compatible with the surrounding open storage uses; significant adverse environmental impact was not expected; and temporary approval was an interim arrangement to alleviate the acute shortage of open storage land in the area. Applications No. A/YL-KTS/204 and 220 were approved on the grounds that there was previous approval granted; no change in planning circumstances and no adverse departmental comments. However, planning permission of application No. A/YL-KTS/204 was revoked due to non-compliance with approval conditions.
- 6.3 Applications No. A/YL-KTS/298, 333, 371, 427, 503, 586, 653 and 757 for temporary open storage of vehicle/spare parts, construction machinery, construction materials, container trailers and/or workshop were approved by the Committee between 2001 and 2017 for a period of 1 to 3 years for similar reasons as mentioned in paragraph 6.2. However, planning permission of applications No. A/YL-KTS/503 and 586 were revoked due to non-compliance with approval conditions. All the approval conditions of the last application (No. A/YL-PH/757) (submitted by a different applicant) have been complied with and the planning permission lapsed on 13.12.2020.

Similar Applications

7.

- 7.1 There are 37 similar applications for various temporary open storage uses within the same "OU(RU)" zone since the promulgation of the then TPB PG-No. 13E on 17.10.2008. Details of these applications are summarized in **Appendix IV** and their locations are shown on **Plan A-1a**.
- 7.2 32 similar applications were approved with conditions by the Committee or by the Board on review between 2008 and February 2021 for similar reasons that the applications complied with TPB-PG No. 13E / 13F in that previous approvals for open storage were granted at the sites and the approval conditions had been complied with; the proposed uses were not incompatible with the surrounding land uses; there were no adverse comments from relevant departments in general; and the departmental concerns could be addressed by appropriate approval conditions. However, planning permissions of 12 applications were revoked due to non-compliance with approval conditions.
- 7.3 Five similar applications were rejected by the Committee or the Board on review between 2011 and 2015. The applications were rejected mainly on the grounds that the developments were incompatible with surrounding land uses; the applications did not comply with the TPB PG-No. 13E in that no previous approval for open storage had been granted at the sites; there were adverse departmental comments; and/or there were insufficient information to demonstrate that the developments would not cause adverse environment, drainage, traffic and landscape impacts.

8. <u>The Site and Its Surrounding Areas (Plans A-2 to A-4c)</u>

- 8.1 The Site is:
 - (a) currently paved and used for the applied use without planning permission; and
 - (b) accessible via a local track branching off from Kam Sheung Road to the east.
- 8.2 The surrounding areas are rural in character intermixed with open storage / storage yards, warehouses, residential structures / dwellings, fallow agricultural land, graves and vacant / unused land:
 - to its north, south and east are open storage / storage yards, site office and service depot, warehouses, residential structures / dwellings (the nearest about 20m to the north), fallow agricultural land and vacant / unused land; and
 - (b) to the west across a nullah are residential structures / dwellings, graves and unused land.

- 6 -

9. <u>Planning Intention</u>

The planning intention of the "OU(RU)" zone is primarily for the preservation of the character of the rural area. Uses or developments compatible with the rural landscape, such as passive recreation uses and a selected range of rural uses, may be allowed on application to the Board, with a view to upgrading or improving the area or providing support to the local communities.

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

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

Land Administration

- 10.1.1 Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD):
 - (a) The Site comprises Government Land (GL) and 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.
 - (b) No permission is given for occupation of GL (about 191m² subject to verification) included in the Site. Any occupation of GL without the Government's prior approval is not allowed.
 - (c) Within the Site, the private lots (Lot Nos. 447RP and 448) are covered by Short Term Waiver (STW) No. 4162 for temporary open storage of construction machinery, vehicles and vehicle parts.
 - (d) Should planning approval be given to the planning application, the STW holder(s) will need to apply to his office for modification of the STW conditions where appropriate. Besides, given the proposed use is temporary in nature, only application for regularization or erection of temporary structure(s) will be considered. Furthermore, the applicant has to either exclude the GL from the Site or obtain a formal approval prior to the actual occupation of the GL. Applications for any of the above will be considered by LandsD acting in the capacity as 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 rent or fee, as may be imposed by LandsD.

Traffic

- 10.1.2 Comments of the Commissioner for Transport (C for T):
 - (a) He has no comment on the application from the traffic engineering point of view.
 - (b) Should the application be approved, approval condition on no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period should be included.
 - (c) The Site is connected to the public road network via a section of a local access road which is not managed by Transport Department. The land status of the local access road should be checked with the LandsD. Moreover, the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities accordingly.
- 10.1.3 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD) :
 - (a) HyD shall not be responsible for the maintenance of any access connecting the Site and Kam Sheung Road.
 - (b) Adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains.

Environment

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

There was no environmental complaint concerning the Site received in the past three years. The applicant is advised to follow the relevant mitigation measures and requirements in the latest COP issued by DEP.

<u>Landscape</u>

- 10.1.5 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) :
 - (a) She has no objection to the application from landscape planning perspective.

- (b) Referring to the aerial photo dated 18.2.2020, the Site is situated in an area of rural landscape character comprising scattered tree groups, temporary structures and open storage yards. The application is considered not incompatible with the surrounding environment.
- (c) Referring to the site visit dated 6.11.2020, the Site is hard paved and in operation as an open storage yard. A number of existing trees including *Bombax ceiba* (木棉), *Ficus macrocarpa* (細葉榕) and *Ficus superba var. japonica* (筆管榕) in fair to poor conditions are found within the Site. Referring to the application, structures 1 and 2 are in conflict with some existing trees in the central part of the Site. In view that the affected trees are common species which can be easily sourced in the local market, significant adverse landscape impact arising from the development is not anticipated.
- (d) The applicant is reminded that approval of the planning application under the Town Planning Ordinance does not imply approval of tree preservation / removal scheme under the lease. The applicant should seek comments and approval from the relevant authority on the proposed tree works and compensatory planting proposal, where appropriate.
- (e) The applicant is advised to reinstate / make good of broken planters to facilitate healthy growth of the trees. It is observed that objects and garbage are stacked around the trees and in the planting areas. The root zone of trees should be free from miscellaneous objects. A minimum 1m clearance should be maintained between any object / garbage from the tree trunk for healthy growth of trees.

Nature Conservation

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

Considering that the Site has been paved and used for open storage purposes for some years, he has no in-principle objection to the application from nature conservation perspective.

Drainage

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

- 9 -

- (a) He has no in-principle objection to the development.
- (b) Based on the submitted drainage proposal, apparently the applicant would maintain the same drainage facilities as those implemented under previous application No. A/YL-KTS/757.
- (c) Should the application be approved, approval conditions on the maintenance of the drainage facilities implemented under application No. A/YL-KTS/757 and submission of record of the existing drainage facilities on-site should be included in the planning permission.

Fire Safety

- 10.1.8 Comments of the Director of Fire Services (D of FS):
 - (a) He has no in-principle objection to the proposal subject 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. 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. The good practice guidelines for open storage in Appendix V should be adhered to.
 - (c) Moreover, having considered the nature of the open storage, approval condition on provision of fire extinguisher(s) with 6 weeks from the date of planning approval is recommended to be added. To address this condition, the applicant should submit a valid fire certificate (FS251) to his department for approval.
 - (d) The applicant is reminded that if the proposed structure(s) is required to comply with the Buildings Ordinance (BO) (Cap.123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.

Building Matters

- 10.1.9 Comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):
 - (a) As there is no record of approval granted by the Building Authority (BA) for the existing structures at the Site, he is not in

a position to offer comments on their suitability for the use proposed in the application.

- (b) Before any new building works (including containers / open sheds as temporary buildings, demolition and land filling, etc.) are to be carried out on the Site, prior approval and consent of the BA should be obtained, otherwise they are UBW. An Authorized Person should be appointed as the coordinator for the proposed building works in accordance with the Buildings Ordinance (BO).
- (c) His detailed comments on UBW, provision of access, temporary or licensed structures are at **Appendix VII**.
- (d) Detailed checking under the BO will be carried out at building plan submission stage.

District Officer's Comments

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

He has not received any comment from the locals upon close of consultation and he has no particular comment on the application.

- 10.2 The following Government departments have no comment on / no objection to the application:
 - (a) Chief Engineer / Construction, Water Supplies Department;
 - (b) Project Manager (West), Civil Engineering and Development Department;
 - (c) Director of Electrical and Mechanical Services; and
 - (d) Commissioner of Police.

11. Public Comments Received During Statutory Publication Period

On 30.10.2020, the application was published for public inspection. During the three-week statutory publication period, three public comments were received from individuals (**Appendices VI-1 to VI-3**), objecting to the application mainly on the grounds that the proposed development would increase traffic flow affecting the safety of villagers and their living quality; leakage of oil from the construction machinery and vehicles would result in land contamination; the current operating condition including the landscaping should be taken into account when considering the application; and there should be a plan to amalgamate operations alike in industrial parks.

12. Planning Considerations and Assessments

- 12.1 The application is for temporary open storage of construction machinery, construction material, vehicle and vehicle parts for a period of 3 years at "OU(RU)" zone. The planning intention of the "OU(RU)" zone is primarily for the preservation of the character of the rural area. Uses or developments compatible with the rural landscape, such as passive recreation uses and a selected range of rural uses, may be allowed on application to the Board, with a view to upgrading or improving the area or providing support to the local communities. The applied use is not in line with the planning intention of the "OU(RU)" zone. Nevertheless, there is no known programme for long-term development at the Site. Hence, it is considered that approval of the application on a temporary basis would not frustrate the long-term planning intention of the "OU(RU)" zone.
- 12.2 The development is considered not incompatible with the surrounding land uses, which are rural in character intermixed mainly with residential structures / dwellings, fallow agricultural land and vacant / unused land.
- 12.3 According to TPB PG-No. 13F, the Site falls within Category 3 areas. The following guidelines are relevant:

Category 3 areas: within these areas, "existing" and approved open storage and port back-up uses are to be contained and further proliferation of such uses is not acceptable. Applications would normally not be favourably considered unless the applications are on sites with previous planning approvals. Sympathetic consideration may be given if the applicants have demonstrated genuine efforts in compliance with approval conditions of the previous planning applications and included in the fresh applications relevant technical assessments/proposals, if required, to demonstrate that the proposed uses would not generate adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas. Subject to no adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions, planning permission could be granted on a temporary basis up to a maximum period of 3 years.

12.4 The application is generally in line with the TPB PG-No. 13F in that previous approvals for similar / the same open storage use at the Site was granted since 1998 and all the approval conditions in the last approved application (No. A/YL-KTS/757) have been complied with. Also, relevant departments consulted, including C for T, CE/MN of DSD, D of FS, DEP and CTP/UD&L of PlanD have no adverse comment on the application. Compared with the last approved application No. A/YL-KTS/757, the current application is for the same applied use, a slightly larger site area (+191m² / +4.8%), changes to the internal layout, deleting one structure and reducing GFA (-174m² / -21.6%) and increasing in the number of parking spaces and loading / unloading spaces . The application. As previous approvals have been granted and there is no major change in planning

circumstances since the last approval, sympathetic consideration could be given to the current application.

- 12.5 To minimize the possible environmental nuisance, approval conditions restricting the operation hours, vehicle type and workshop-related activity are recommended in paragraph 13.2(a) to (d). The applicant will also be advised to adopt the latest COP. The technical requirements of C for T, CE/MN of DSD and D of FS could be addressed by approval conditions in paragraph 13.2(e) to (j) below.
- 12.6 Besides the previous approved applications for various open storage use at the Site, there are also 37 similar approved applications within the same "OU(RU)" zone as detailed in paragraph 7 above. The five rejected similar applications are subject to different circumstances as they did not comply with the then TPB PG-No.13E.
- 12.7 Three public comments were received during the statutory publication period, objecting to the application as stated in paragraph 11 above. In this regard, relevant Government departments' comments as well as planning assessments and considerations as stated above are relevant.

13. Planning Department's Views

- 13.1 Based on the assessments made in paragraph 12 and having taken into account the public comments mentioned in paragraph 11, the Planning Department considers that the temporary open storage of construction machinery, construction material, vehicle and vehicle parts <u>could be tolerated</u> for a period of 3 years.
- 13.2 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 <u>26.3.2024</u>. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval Conditions

- (a) no operation between 6:00 p.m. and 9:00 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;
- (b) no operation on Sundays and public holidays, as proposed by the applicant, is allowed on the Site during the planning approval period;
- (c) no dismantling, maintenance, repairing, cleansing, paint spraying or other workshop activities are allowed on the Site at any time during the planning approval period;
- (d) no medium or heavy goods vehicles exceeding 5.5 tonnes, including container tractors/trailers, as defined in the Road Traffic Ordinance are

allowed to be parked/stored on or enter/exit the Site at any time during the planning approval period;

- (e) no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (f) the existing drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (g) the submission of a record of the existing drainage facilities on site within **3** months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by 26.6.2021;
- (h) the provision of fire extinguisher(s) within 6 weeks from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by <u>7.5.2021</u>;
- the submission of fire service installations proposal within 6 months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by <u>26.9.2021</u>;
- (j) in relation to (i) above, the implementation of fire service installations proposal within 9 months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by <u>26.12.2021</u>;
- (k) if any of the above planning condition (a), (b), (c), (d), (e) 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; and
- (l) if any of the above planning condition (g), (h), (i) or (j) 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 Appendix VII.

13.3 Alternative, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the development is not in line with the planning intention of the "OU(RU)" zone, which is primarily for the preservation of the character of the rural area. Uses or developments compatible with the rural landscape, such as passive recreation uses and a selected range of rural uses, may be allowed on application to the Board, with a view to upgrading or improving the area or providing support to the local communities. There is no strong planning justification in the

submission for a departure from the planning intention, even on a temporary basis.

14. Decision Sought

- 14.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 14.2 Should the Committee decide to approve the application, Members are invited to consider the approval 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.
- 14.3 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

Appendix I	Application form with plans received on 20.10.2020
Appendix Ia	FI received on 7.12.2020
Appendix Ib	FI received on 29.1.2021
Appendix Ic	FI received on 17.3.2021
Appendix II	Extract of TPB PG-No. 13F
Appendix III	Previous s.16 applications covering the Site
Appendix IV	Similar applications within the same "OU(RU)" zone on the approved Kam Tin South OZP
Appendix V	Good Practice Guidelines for open storage
Appendices VI-1 to VI-3	Public comments received during the statutory publication period
Appendix VII	Advisory Clauses
Drawing A-1	Layout Plan

Plan A-1a	Location Plan with Similar Applications
Plan A-1b	Previous Application Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plan A-4a to 4c	Site Photos

- 15 -

PLANNING DEPARTMENT MARCH 2021