

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/YL-LFS/413

- Applicants** : Mr. Cheung Man Tung and Mr. Tang Nam Shing represented by Aikon Development Consultancy Limited
- Site** : Lots 1135 S.C ss.1 (Part), 1135 S.C RP, 1135 S.D (Part) and 1135 RP (Part) in D.D.129, Mong Tseng Wai, Lau Fau Shan, Yuen Long, New Territories
- Site Area** : About 125m²
- Lease** : Block Government Lease (demised for agricultural use)
- Plan** : Draft Lau Fau Shan and Tsim Bei Tsui Outline Zoning Plan (OZP) No. S/YL-LFS/10
- Zonings** : “Village Type Development” (“V”) (about 93%)
[Restricted to a maximum building height of 3 storeys (8.23m)]

“Green Belt” (“GB”) (about 7%)
- Application** : Proposed House (New Territories Exempted House (NTEH) - Small House) and Filling and Excavation of Land

1. The Proposal

- 1.1 The applicants, on behalf of an indigenous villager of Mong Tseng Wai, seek planning permission to build a NTEH (Small House) as well as associated filling and excavation of land at the application site (the Site) (**Plan A-1**). The Site falls within an area mainly zoned “V” (about 93%) with a minor portion zoned “GB” (about 7%) on the draft Lau Fau Shan and Tsim Bei Tsui OZP No. S/YL-LFS/10. According to the Notes of the OZP, whilst ‘House (NTEH only)’ is always permitted within the “V” zone, ‘House (other than rebuilding of NTEH or replacement of existing domestic building by NETH permitted under the covering Notes)’ within the “GB” zone is a Column 2 use that requires planning permission from the Town Planning Board (the Board). Besides, filling and excavation of land within the “V” and “GB” zones also require planning permission from the Board.
- 1.2 A portion of the Site forms part of a previous planning application (No. A/YL-LFS/371) for proposed filling and excavation of land for 12 permitted houses (NTEH – Small House)¹, which was approved with conditions by the Rural and New Town

¹ Although about 70% of the Site is involved in the application site boundary of the previously approved application (No. A/YL-LFS/371), the concerned portion of the Site was basically not proposed for Small House

Planning Committee (the Committee) of the Board on 23.10.2020 (**Plan A-1b**). The approved development is yet to be implemented. The Site is currently covered with vegetation (**Plan A-4**).

- 1.3 The proposed Small House has a covered area of 65.03m² and a total gross floor area of 195.09m², and is of 3 storeys (8.23m) high (**Drawing A-1**). The footprint of the proposed Small House will be confined to the “V” zone portion. The applicants have indicated that the uncovered area of the Site will be used as garden and reserved space for ancillary facilities, such as drainage channels. The Site is accessible from Deep Bay Road via a local track and footpath (**Drawing A-2**). No car parking space and vehicular access would be provided. Septic tank and soakaway system are proposed for the Small House. The layout plan of the proposed Small House and access plan are at **Drawings A-1** and **A-2** respectively.
- 1.4 According to the applicants, the Site is a sloping ground descending from northwest to southeast. To carry out site formation for the proposed Small House development, the entire Site (about 125m²) is proposed to be excavated by not more than 2.8m in depth, and filled by compacted fill for not more than 3m in thickness. The proposed final formation level of the Site will be at +20mPD, which is the same as that of the adjoining land filling works under the previously approved application No. A/YL-LFS/371. The site formation plan of the proposed Small House development is at **Drawing A-3**.
- 1.5 In support of the application, the applicants have submitted the following documents:
 - (a) Application Form received on 3.11.2021 (**Appendix I**)
 - (b) Supporting Planning Statement (**Appendix Ia**)
 - (c) Further information (FI) received on 16.12.2021 (**Appendix Ib**)
(*exempted from the publication requirement*)

2. Justifications from the Applicants

The justifications put forth by the applicants in support of the application are detailed in the Supporting Planning Statement at **Appendix Ia**. They can be summarised as follows:

- (a) Due to the uneven level of the Site, and to unify the site formation level with the adjoining proposed Small House developments under planning applications No. A/YL-LFS/371 and 387, the proposed filling and excavation of land for site formation is necessary. The proposed filling and excavation works will also bring betterments on construction, visual, maintenance and management aspects.
- (b) The land supply for Small House development at Mong Tseng Wai is limited by the dense vegetation/tree groups and ponds thereat. On the other hand, there is relatively large number of outstanding and future demand for Small House land, especially when the ‘village environs’ (‘VE’) of Mong Tseng Wai overlaps with that of Mong Tseng Tsuen. The Site is the best location for proposed Small House development.
- (c) The proposed development is in line with the planning intention of the “V” zone, the Interim Criteria for Consideration of Application for NTEH/Small House in New

development nor any associated land filling and excavation (site formation) works under the previously approved application.

Territories, as well as the Town Planning Board Guidelines No. 10 for ‘Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance’ and No. 12C for ‘Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance’.

- (d) The Site is expected to be surrounded by Small House developments in the future. The proposed development is compatible with the surrounding area.
- (e) The proposed development will not cause significant adverse traffic, landscape, environmental and drainage impacts.
- (f) With the previous and similar planning applications for the same development, approval of the proposed development will not set an undesirable precedent.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicants are two of the “current land owners”. In respect of the other “current land owners”, the applicants have complied with the requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Ordinance (TPB PG-No. 31A) by notifying the other current land owners vide registered mail. Detailed information would be deposited at the meeting for Members’ inspection.

4. Assessment Criteria

The set of Interim Criteria for Consideration of Application for NTEH/Small House in New Territories (the Interim Criteria) was first promulgated on 24.11.2000. The latest set of Interim Criteria, which was promulgated on 7.9.2007, is at **Appendix II**.

5. Town Planning Board Guidelines

5.1 Town Planning Board Guidelines for “Application for Development within the Green Belt Zone under Section 16 of the Town Planning Ordinance” (TPB PG-No. 10) are relevant to the application. The relevant assessment criteria are summarised as follows and detailed at **Appendix III**.

- (a) there is a general presumption against development (other than redevelopment) in “GB” zone;
- (b) an application for new development in “GB” zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be compatible with the character of surrounding areas;
- (c) applications for NTEH with satisfactory sewage disposal facilities and access arrangements may be approved if the application sites are in close proximity to existing villages and in keeping with the surrounding uses, and where the development is to meet the demand from indigenous villagers;

- (d) 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, and cause any adverse visual impact on the surrounding environment;
 - (e) the vehicular access road and parking provision proposed should be appropriate to the scale of the development and comply with relevant standards. Access and parking should not adversely affect existing trees or other natural landscape features;
 - (f) the proposed development should not overstrain the capacity of existing and planned infrastructure such as sewerage, road and water supply. It should not adversely affect drainage or aggravate flooding in the area;
 - (g) the proposed development should not overstrain the overall provision of Government, institution and community facilities in the general area; and
 - (h) any proposed development on a slope or hillside should not adversely affect slope stability.
- 5.2 According to Town Planning Board Guidelines for “Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance” (TPB PG-No. 12C), the Site falls within the Wetland Buffer Area (WBA). The relevant assessment criteria are summarized as follows and detailed at **Appendix IV**.
- (a) the intention of the WBA is to protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area (WCA) and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds; and
 - (b) within the WBA, for development or redevelopment which requires planning permission from the Board, an ecological impact assessment (EcoIA) would also need to be submitted. Some local and minor uses (including NTEH) are however exempted from the requirement of EcoIA.

6. Background

The Site is currently not subject to any active planning enforcement action.

7. Previous Application

- 7.1 A portion of the Site (about 70%) forms part of a previous application (No. A/YL-LFS/371) for proposed filling and excavation of land for 12 permitted houses (NTEH – Small House) use within the same “V” zone. The application was approved with conditions on 23.10.2020 mainly on considerations of in line with the planning intention, not incompatible with the landscape character of the surroundings, not in contravention with TPB PG-No. 12C and no objection/adverse comment from concerned government departments. The proposed development has not been implemented, and the planning permission is still valid until 23.10.2024. Details of the above previous application are summarised at **Appendix V** and its location is

shown on **Plan A-1b**.

- 7.2 Compared with the previous application, the current application is submitted by the same applicants for proposed Small House development which requires planning permission and covers different extent of the Site.

8. Similar Applications

- 8.1 Within the same “GB” zone, there are 10 similar applications (No. A/YL-LFS/65, 174, 175, 176, 177, 178, 179, 180, 191 and 387) covering 9 sites for proposed Small House development with or without filling and excavation of land since the first promulgation of the Interim Criteria on 24.11.2000. 1 of them was approved with conditions while 9 of them were rejected by the Committee. Details of the similar applications are summarised at **Appendix VI** and their locations are shown on **Plan A-1a**.

Approved Application

- 8.2 Application No. A/YL-LFS/387 for proposed house (NTEH – Small House) and filling and excavation of land straddling the “V” zone of Mong Tseng Wai and the “GB” zone was approved within conditions by the Committee on considerations that the footprint of the proposed Small House and the proposed excavation and filling of land were confined within the “V” zone and the ‘VE’ of Mong Tseng Wai; the “GB” portion is reserved for such necessary facilities as drainage channels only, the proposed development is in line/not in conflict with the planning intention of the “V” and “GB” zones, the Interim Criteria, and TPB PGs-No. 10 and 12C; the proposed development is not entirely incompatible with the surroundings; and concerned government departments have no objection/adverse comment.

Rejected Applications

- 8.3 The remaining 9 applications for proposed house (NTEH – Small House) covering 8 sites straddled the “V” zone of Sha Kong Wai, Ngau Hom and San Hing Tsuen and the “GB” zone. All of these applications had less than 50% of their sites and/or Small House footprints falling within the “V” zone, and were rejected by the Committee between 2001 and 2009 mainly on grounds of not in line with the planning intention of the “GB” zone, the Interim Criteria and/or the TPB PG-No. 10; incompatible with the surrounding area; land still being available for Small House development within the “V” zone; and failure to demonstrate no adverse landscape impact.

9. The Site and Its Surrounding Areas (Plans A-1a to A-4)

- 9.1 The Site is:

- (a) located on a gentle sloping ground descending from the northwest to the southeast, and is currently covered with weed;
- (b) located to the north of the village proper of Mong Tseng Wai and Mong Tseng Tsuen; and

- (c) accessible only by an informal track leading from a local track, which connects to Deep Bay Road.
- 9.2 The surrounding areas have the following characteristics:
- (a) to the north and northeast are shrubland and cultivated agricultural land;
 - (b) to the east is a shrubland with a residential dwelling. To the southeast is the village proper of Mong Tseng Wai and Mong Tseng Tsuen; and
 - (c) to the southwest are village houses, a storage yard and parking lots. To the northwest is a knoll of shrubland intermixed with graves, which fall within the Permitted Burial Ground No. YL/61 (**Plan A-2a**).

10. Planning Intentions

- 10.1 The planning intention of the “V” zone is to designate both existing recognised villages and areas of land considered suitable for village expansion. Land within this zone is primarily intended for development of Small Houses by indigenous villagers. It is also intended to concentrate village type development within this zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services.
- 10.2 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.
- 10.3 As filling of land/pond or excavation of land within the “V” and “GB” zones may cause adverse drainage impacts on the adjacent areas and adverse impacts on the natural environment, permission from the Board is required for such activities.

11. Comments from Relevant Government Departments

- 11.1 The application has been assessed against the assessment criteria in **Appendix II**. The assessment is summarised in the following table:

	<u>Criteria</u>	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
1.	Within “V” zone ² ? - Footprint of the proposed Small House - Application site	100% 93%	- 7%	The remaining portion of the Site falls within the “GB” zone.

² The subject “V” zone covers the ‘VE’ of Mong Tseng Wai and Mong Tseng Tsuen.

	<u>Criteria</u>	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
2.	Within 'VE'? - Footprint of the proposed Small House - Application site	100% 100%	- -	The Site and the footprint of the proposed Small House fall entirely within the 'VE' of Mong Tseng Wai.
3.	Sufficient land in "V" zone to meet Small House demand (outstanding Small House application plus 10-year Small House demand)?		✓	<u>Land Required</u> <ul style="list-style-type: none"> Land required to meet Small House demand in Mong Tseng Wai and Mong Tseng Tsuen: about 10.98ha (or equivalent to 439 Small House sites). For Mong Tseng Wai, the outstanding Small House applications are 97 while the 10-year Small House demand forecast for the same village is 160. For Mong Tseng Tsuen, the outstanding Small House application is 117 while the 10-year Small House demand forecast for the same village is 65.
4.	Sufficient land in "V" zone to meet outstanding Small House applications?	✓		<u>Land Available</u> <ul style="list-style-type: none"> Land available to meet Small House demand within the "V" zone of the village concerned: about 10.67 ha (equivalent to about 426 Small House sites). (Plan A-2b)
5.	Compatible with the planning intention of "GB" zone?		✓	<ul style="list-style-type: none"> There is a general presumption against development within the "GB" zone. The Director of Agriculture, Fisheries and Conservation (DAFC) has no comment on the application.
6.	Compatible with surrounding area / development?	✓		The surrounding area is predominantly rural in character mainly with village houses, shrubland and cultivated agricultural land.
7.	Within Water Gathering Ground (WGG)?		✓	

	<u>Criteria</u>	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
8.	Encroachment onto planned road networks and public works boundaries?		✓	
9.	Need for provision of fire service installations (FSIs) and emergency vehicular access (EVA)?		✓	The Director of Fire Services (D of FS) has no in-principle objection to the application.
10.	Traffic impact?		✓	The Commissioner for Transport (C for T) has no adverse comment on the application.
11.	Drainage impact?		✓	<ul style="list-style-type: none"> • The Chief Engineer / Mainland North, Drainage Services Department (CE/MN, DSD) has no in-principle objection to the application from drainage point of view. • Approval conditions on submission and implementation of drainage proposal, and maintenance of the implemented drainage facilities are required.
12.	Sewerage impact?		✓	The Director of Environmental Protection (DEP) has no objection to the application from environmental planning perspective, and considers septic tank and soakaway system an acceptable means of collection, treatment and disposal of sewage.
13.	Landscape impact?		✓	The Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) has no objection to the application from landscape planning perspective as significant adverse landscape impact arising from the proposed development is not anticipated.
14.	Geotechnical impact?		✓	Head of Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD) has no comment on the application.

	<u>Criteria</u>	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
15.	Local objection conveyed by District Officer?		✓	

11.2 Comments from the following government departments have been incorporated in paragraph 11.1 above. Other detailed comments are at **Appendix VII**.

- (a) CE/C, WSD;
- (b) CE/MN, DSD;
- (c) C for T;
- (d) CTP/UD&L, PlanD;
- (e) DAFC;
- (f) DEP;
- (g) DLO/YL, LandsD;
- (h) D of FS; and
- (i) H(GEO), CEDD.

11.3 The following government departments have no objection to/no comment on the application:

- (a) Chief Engineer/Land Works, CEDD (CE/LW, CEDD);
- (b) Project Manager (West), CEDD (PM(W), CEDD);
- (c) Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD);
- (d) Commissioner of Police (C of P); and
- (e) District Officer (Yuen Long), Home Affairs Department (DO(YL), HAD).

12. Public Comments Received During Statutory Publication Period

On 12.11.2021, the application was published for public inspection. During the statutory public inspection period, 2 public comments from individuals (**Appendices VIII-1 and VIII-2**) were received objecting to the application on grounds that over-concentration of village developments would pose adverse traffic, environmental and fire safety impacts to villagers; and that Small House development should be kept within the village proper.

13. Planning Considerations and Assessments

13.1 The application is for proposed Small House (SH) development and filling and excavation of land. The Site falls within an area largely zoned “V” (about 93%) with a minor portion zoned “GB” (about 7%) on the OZP. 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. Although the proposed development is not in line with the planning intention of the “GB” zone, the land involved within the “GB” zone (about 7% or 9m²) is very minor and the footprint of the proposed SH will be confined within the “V” zone portion.

- 13.2 The proposed development would require an excavation of land of not more than 2.8m in depth and filling of land of not more than 3m in thickness for levelling the entire Site. The final formation level of the Site (about 20mPD) will be on the same level of the adjoining land to be formed under planning permission (No. A/YL-LFS/371) for filling and excavation of land for permitted SH developments. Filling and excavation of land within the “V” and “GB” zones requires planning permission from the Board as it may cause adverse drainage impacts on the adjacent area and adverse impacts on the natural environment. In this regard, CE/MN of DSD, DAFC and DEP have no adverse comment from drainage, nature conservation and environmental perspectives. To address the concern of CE/MN of DSD on the potential adverse drainage impact of the proposed development to the surrounding areas, relevant approval conditions have been incorporated in paragraph 14.2 below. Any non-compliance with the approval conditions will result in revocation of the planning permission.
- 13.3 The Site, currently vacant and covered with weed, is located to the north of village proper of Mong Tseng Wai and Mong Tseng Tsuen. Approved SH applications can be found in the close vicinity. The proposed development is not incompatible with the surrounding areas which are predominately rural in character with village houses, shrubland and cultivated land. CTP/UD&L of PlanD has no objection to the application from landscape point of view as significant adverse landscape impact arising from the proposed development is not anticipated.
- 13.4 Other concerned government departments, including C for T, H(GEO) of CEDD, CE/C of WSD and D of FS have no objection to or no comment on the application. As the proposed development is not expected to have significant adverse environmental, landscape, traffic, geotechnical, drainage and sewerage impacts, the proposed development generally meets TPB PG-No. 10.
- 13.5 Although the Site falls within the WBA of TPB PG-No. 12C, the guidelines also specify that planning applications for NTEH are exempted from the requirement of EcoIA. DAFC has no comment on the application from nature conservation point of view as the Site is covered by common vegetation and is located at some distance from WCA. As such, the application is considered not in contravention with TPB PG-No. 12C.
- 13.6 Regarding the Interim Criteria (**Appendix II**), according to DLO/YL of LandsD’s record, the total number of outstanding SH applications for Mong Tseng Wai and Mong Tseng Tsuen is 214, while the 10-year SH demand forecast for the same villages is 225. Based on the latest estimate by PlanD, about 10.67 ha of land (equivalent to about 426 SH sites) are available within the “V” zone concerned to meet the 214 outstanding SH applications. It is noted that only about 7% (about 9m²) of the Site encroaches onto the “GB” zone, which marginally exceeds the cap (i.e. 5% or 10m² whichever is the less) stipulated under the Interim Criteria, below which the encroachment would be regarded as minor boundary adjustment always permitted under the covering Notes of the OZP. The portion within “GB” zone, which also falls within the ‘VE’ of Mong Tseng Wai, would be reserved for ancillary facilities such as drainage channel (**Drawing A-3**). In view of its proximity to the village cluster, sympathetic consideration may be given to the application.
- 13.7 The southern portion of the Site falling within the “V” zone is involved in a previous application (No. A/YL-LFS/371) for proposed filling and excavation of land for 12

permitted houses (NTEH – SH) use (**Plan A-1b**), which was approved with conditions by the Committee on 23.10.2020. The Committee has also approved a similar application (No. A/YL-LFS/387) to the immediate east of the Site for SH development, and filling and excavation of land straddling the same “V” and “GB” zones. Although the Committee has rejected 9 similar applications (No. A/YL-LFS/65, 174, 175, 176, 177, 178, 179, 180 and 191) for proposed SH development straddling the same “GB” zone, all of them had less than 50% of their sites and/or SH footprints falling within “V” zone, within which there was still sufficient land for SH development. For the current application, about 93% of the Site and the entire SH footprint fall within the “V” zone. As such, approving the subject application is in line with the previous decisions of the Committee.

- 13.8 There are 2 public comments received objecting to the application on grounds as summarised in paragraph 12 above. The planning considerations and assessments in paragraphs 13.1 to 13.7 above are relevant.

14. Planning Department’s Views

- 14.1 Based on the assessments made in paragraph 13 and having taken into account the public comments mentioned in paragraph 12, the Planning Department has no objection to the application.
- 14.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until **24.12.2025**, 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 provision of septic tank, as proposed by the applicants, at a location to the satisfaction of the Director of Lands or of the Town Planning Board;
- (b) the submission of drainage proposal before commencement of land filling and excavation works on the Site and the issue of any certificate of exemption by the Lands Department to the satisfaction of the Director of Drainage Services or of the Town Planning Board;
- (c) in relation to (b) above, the implementation of the drainage proposal upon completion of the land filling and excavation works on the Site to the satisfaction of the Director of Drainage Services or of the Town Planning Board; and
- (d) if any of the above planning condition (b) or (c) is not complied with, before commencement or upon completion of the land filling and excavation works respectively, the approval hereby given shall cease to have effect and shall be revoked immediately without further notice.

Advisory Clauses

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

- 14.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the proposed excavation and filling of land is not in line with the planning intention of the "GB" zone which 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. There is no strong planning justification in the submission for a departure from this planning intention.

15. Decision Sought

- 15.1 The Committee is invited to consider the application and decide whether to grant or refuse the planning permission.
- 15.2 Should the Committee decide to approve the application, Members are invited to consider the approval conditions and advisory clauses, if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 15.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicants.

16. Attachments

Appendix I	Application Form received on 3.11.2021
Appendix Ia	Supporting Planning Statement
Appendix Ib	Further Information received on 16.12.2021
Appendix II	Revised Interim Criteria for Consideration of Application for New Territories Exempted House/Small House in New Territories (Promulgated on 7.9.2007)
Appendix III	Relevant Extracts of Town Planning Board Guidelines for Application for Development within Green Belt Zone (TPB PG-No. 10)
Appendix IV	Relevant Extracts of Town Planning Board Guidelines for Application for Development within Deep Bay Area (TPB PG-No. 12C)
Appendix V	Previous Application
Appendix VI	Similar Applications within the same "GB" zone
Appendix VII	Detailed comments from relevant government departments
Appendices VIII-1 and VIII-2	Public Comments Received During Statutory Publication Period
Appendix IX	Recommended Advisory Clauses
Drawing A-1	Layout Plan
Drawing A-2	Access Plan
Drawing A-3	Site Formation Plan
Plan A-1a	Location Plan with Similar Applications
Plan A-1b	Site Plan with Previous Application
Plan A-2a	Site Plan
Plan A-2b	Estimated amount of land available for Small House development within the "Village Type Development" zone
Plan A-3	Aerial Photo

Plan A-4

Site Photo

**PLANNING DEPARTMENT
DECEMBER 2021**