

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/YL-TYST/1146

- Applicant** : Civil Engineering and Development Department (CEDD) represented by Ove Arup & Partners Hong Kong Limited
- Site** : Lots 1829 S.A ss.2 (part), 1829 S.A ss.3 (part) and 1829 S.A RP (part) in D.D. 121 and Adjoining Government Land (GL), Yuen Long
- Site Area** : 85,250m² (about) (including GL of about 24,910m² or 29.2%)
- Lease** : Tai Po New Grant No. 7142
- Plan** : Approved Tong Yan San Tsuen Outline Zoning Plan (OZP) No. S/YL-TYST/14
- Zoning** : “Green Belt” (“GB”)
- Application** : Proposed Service Reservoirs with Associated Excavation and Filling of Land

1. The Proposal

- 1.1 The applicant seeks planning permission for proposed service reservoirs with associated excavation and filling of land at the application site (the Site) (**Plan A-1**). According to the Notes of the OZP for the “GB” zone, ‘Service Reservoir’ is a Column 2 use which requires planning permission from the Town Planning Board (the Board). Any excavation and filling of land within the “GB” zone also requires planning permission from the Board. The Site is currently vacant and mainly covered by vegetation (**Plans A-2 to A-4c**). There is no previous application concerning the Site.
- 1.2 The proposal is for a freshwater service reservoir (FWSR) and a flushing water service reservoir (FLWSR) to serve the long-term water demands of the Hung Shui Kiu/Ha Tsuen New Development Area (HSK/HT NDA) and Yuen Long South (YLS) Development (**Plan A-1**). The proposed FWSR and FLWSR will measure about 219m x 97m and 93m x 80m, with design capacities of about 138,000m³ and 47,000m³ respectively (**Drawing A-2**). The service reservoirs will each be one-storey in height with a rooftop structure (about 13.5m in total) (**Drawings A-3 and A-4**). About 41% and 24% of the Site will be occupied by the service reservoirs and retaining slopes respectively, with the remaining 35% allocated for

the associated access. A potential footpath is being explored as part of the proposal, providing access between some existing walking trails to the west and the local road leading from Long Hon Road to the east (**Drawing A-2**).

- 1.3 To facilitate the proposed service reservoirs, some 62,180m² and 3,870m² of land at a maximum depth of about 47m and 9.5m are proposed to be excavated and filled respectively for site formation purpose (**Drawing A-5**). The site formation levels of the service reservoirs will be approximately 60-65mPD, and cut slopes and retaining walls will be formed around the service reservoirs. An estimated 1.23M m³ of excavated materials will be generated as part of the proposal. Although some of the excavated materials will be reused as backfill at the Site and at the HSK/HT NDA, the remaining excavated materials will be transferred off-site to the fill bank at Tuen Mun Area 38.
- 1.4 A number of visual and landscape mitigation measures are proposed as part of the development, including proper protection/preservation of retained trees, landscaping of cut slopes, green roofs atop the proposed service reservoirs, screening/vertical/buffer planting and visually sensitive treatment of retaining walls and structures, etc. (**Drawings A-6 and A-7**). About 950 trees will be affected by the proposed development. In accordance with Development Bureau Technical Circular (Works) No. 4/2020 on Tree Preservation (DEVB TC(W) No. 4/2020), compensatory planting at a rate of not less than 1:1 will be carried out at the Site as far as practicable, and where necessary, at HSK/HT NDA.
- 1.5 The proposal will tentatively be completed in 2030 (for the FWSR) and 2032 (for the FLWSR) having regard to the implementation programmes of the HSK/HT NDA and YLS Development.
- 1.6 Plans showing the site selection considerations, proposed site layout, sections, extent of excavation/filling of land, landscape proposals and photomontages submitted by the applicant are at **Drawings A-1 to A-10** respectively.
- 1.7 In support of the application, the applicant has submitted the following documents:
 - (a) Application Form received on 5.1.2022 (**Appendix I**)
 - (b) Supplementary Planning Statement (**Appendix Ia**)
 - (c) Supplementary Information dated 12.1.2022 (**Appendix Ib**)
 - (d) Further Information (FI) dated 24.2.2022 (**Appendix Ic**)
[exempted from publication and recounting requirements]

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in the Supplementary Planning Statement and FI (**Appendices Ia and Ic**). They can be summarised as follows:

- (a) Both the HSK/HT NDA and YLS Development projects had undergone extensive feasibility studies with associated public consultation during the 2010's¹, resulting in the formulation of various development plans and subsequently new/amended statutory town plans. Taking into account the projected population intake of the two projects, the freshwater supply from the existing Tan Kwai Tsuen (TKT) South FWSR (**Plan A-1**) and the flushing water supply from the planned salt water supplies in the area were found to be inadequate. Therefore, two service reservoirs are proposed to support the aforesaid mega-scale development projects. The critical need and general feasibility of this essential infrastructure were established at the planning and engineering feasibility stage of the HSK/HT NDA and YLS Development, and their general location, at and around the Site, were duly reflected in the HSK/HT Outline Development Plan (ODP) and the Revised Recommended Outline Development Plan (RODP) of YLS respectively. Compared with the designations on the ODP and Revised RODP, the extent of the current proposed works has increased mainly due to the incorporation of associated slope works and the need to meet the additional projected water demand from the development projects.
- (b) A thorough site-selection process had been undertaken with due regard to the design capacity of the service reservoirs. There is a need to position the proposed service reservoirs in proximity to the water supply zone (i.e. the two NDAs); at an altitude above 60mPD to maintain water pressure in the supply zone; and avoid sensitive/ 'no-go' areas. While alternative sites, including Yuen Tau Shan and Kung Um Shan, and cavern option have been explored, the Site is considered the most appropriate location for the proposal (**Drawing A-1**). The feasibility of accommodating the proposal into caverns was reviewed under a separate study², though it was concluded that the current proposed service reservoirs could not be accommodated in the cavern due to significant programme mismatch.
- (c) The proposal is compatible with the existing service reservoirs nearby (**Plan A-1**) and is considered in line with the Town Planning Board Guidelines for "Application Development within "GB" Zone under Section 16 of the Town Planning Ordinance" (TPB PG-No. 10).
- (d) While the proposed service reservoirs are not Designated Projects under the Environmental Impact Assessment Ordinance (EIAO), nevertheless, the location/ siting of the two proposed service reservoirs was duly addressed under the EIA submissions for HSK/HT NDA and YLS Development, which were approved with conditions in December 2016 and November 2017 respectively. Various technical assessments, including preliminary environmental review (PER), landscape and visual impact assessment (LVIA) and geotechnical assessment, have demonstrated that there will be minimal environmental, ecological, landscape and visual, cultural heritage, geotechnical and traffic impacts arising from the proposal with the imposition of mitigation measures. Compensatory planting will be provided in accordance with relevant guidelines. Furthermore, the proposed excavation and filling of land would not generate adverse drainage impact on the surrounding area.

¹ Agreement No. CE 2/2011 (CE) 'Hung Shui Kiu New Development Area Planning and Engineering Study – Investigation' and Agreement No. CE 35/2012 (CE) 'Planning and Engineering Study for Housing Sites in Yuen Long South – Investigation' (the Planning and Engineering Studies).

² Agreement No. CE 39/2018 (WS) 'Strategic Cavern Areas to Accommodate Existing and Proposed Service Reservoirs in Lam Tei and Adjoining Areas - Feasibility Study'.

- (e) While the roofs of the proposed service reservoirs will be landscaped, the design has duly allowed for potential recreational uses atop should relevant parties decide to take forward proposals for recreational and associated uses in the future. In response to the public comments received, a potential footpath is being explored as part of the proposal (**Drawing A-2**), which would be further developed at the detailed design stage.

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

The applicant is not a “current land owner” but has complied with the requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) by posting notices near the Site and publishing notices in local newspapers. Detailed information would be deposited at the meeting for Members’ inspection. For GL, the requirements as set out in TPB PG-No. 31A are not applicable.

4. Town Planning Board Guidelines

TPB PG-No. 10 are relevant to this application. The relevant assessment criteria are summarised as follows and detailed at **Appendix II**:

- (a) there is a general presumption against development (other than redevelopment) in “GB” zone. In general, the Board will only be prepared to approve applications for development in the context of requests to rezone to an appropriate use;
- (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. The scale and intensity of the proposed development including the plot ratio (PR), site coverage and building height should be compatible with the character of surrounding areas;
- (c) applications for Government, institution or community (GIC) uses and public utility installations must demonstrate that the proposed development is essential and that no alternative sites are available. The PR of the development site may exceed 0.4 so as to minimise the land to be allocated for GIC uses;
- (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, or 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. Tree preservation and landscaping proposals should be provided;
- (f) 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;

and

- (g) any proposed development on a slope or hillside should not adversely affect slope stability.

5. Background

5.1 The need for new service reservoirs to support the HSK/NT NDA and YLS Development, as well as their general location at and around the Site, were identified in the respective feasibility studies as early as 2016. While the general locations of the service reservoirs were reflected in the adopted ODP for HSK/HT NDA and the Revised RODP for YLS, the proposed service reservoirs were not incorporated in the new/amended statutory town plans at the time as the exact details of the proposed works were still being formulated.

5.2 The Site is currently not subject to planning enforcement action.

6. Previous Application

There is no previous planning application concerning the Site.

7. Similar Application

There is no similar application within the subject “GB” zone.

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

8.1 The Site is:

- (a) currently vacant, on hilly terrain and mainly covered with vegetation;
- (b) traversed by an unpaved local track in the southern half of the Site which connects a local road leading from Long Hon Road in the east with local tracks leading up to Kung Um Shan in the south (**Plans A-1 and A-2**); and
- (c) accessible from Long Hon Road via a local road to the east (**Plan A-1**).

8.2 The surrounding areas have the following characteristics (**Plans A-1 to A-3**):

- (a) countryside in character, predominated by woodland and shrubland on hillside slopes intermixed with graves and footpaths;
- (b) about 5m to the south of the Site is an area zoned “Conservation Area” predominated by woodland;
- (c) the existing TKT North FWSR and TKT South FWSR & TKT Salt Water Service Reservoir are located about 180m and 500m respectively to the

southwest of the Site within the “Government, Institution or Community” zone (**Plan A-1**); and

- (d) while there are a number of open storage/storage yards, warehouses and parking of vehicles at the foothills to the further east of the Site within the nearby “Residential (Group B)1”, “Residential (Group C)” and “Residential (Group D)” zones, most of them are suspected unauthorised developments subject to enforcement action taken by the Planning Authority.

9. Planning Intention

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. Comments from Relevant Government Departments

- 10.1 The following government bureau/departments have been consulted and their views on the application and public comments, where relevant, are summarised as follows:

Long Term Development

- 10.1.1 Comments of the Secretary for Development (SDEV):

The current application is for a FWSR and a FLWSR which are essential infrastructures to meeting the long-term water demands arising from the HSK/HT NDA and YLS Development. The Site has been selected under the Planning and Engineering Studies going through technical assessments and extensive public consultation. The scale and extent of the proposed service reservoirs has taken into consideration the design capacity of the service reservoirs in meeting the projected water demand from the development projects and other technical requirements. From the perspective of taking forward the NDA projects, the application is supported.

- 10.1.2 Comments of the Chief Engineer/Cross-Boundary Infrastructure and Development, Planning Department (CE/CID, PlanD):

According to the Revised RODP of YLS promulgated in May 2020, the Site encroaches onto an area zoned “Other Specified Uses (Service Reservoir)”, which is intended for a potential reclaimed water service reservoir. The proposed service reservoirs would cope with the fresh and flushing water demand of the HSK/HT NDA and YLS Development.

Land Administration

10.1.3 Comments of the Chief Estate Surveyor/New Development Area, Lands Department (CES/NDA, LandsD):

- (a) She has no comment on the application.
- (b) As the Site will affect several private lots (i.e. Lots No. 1829 S.A ss.2 (part), 1829 S.A ss.3 (part) and 1829 S.A RP (part) in D.D.121) and adjoining GL, land resumption and clearance are required to implement the proposal.

Traffic

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

She has no comment from the traffic engineering viewpoint.

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

The applicant should note the detailed comments at **Appendix IV**.

Environment

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

- (a) She has no objection to the application.
- (b) While there are some suggestions on textual comments on the submitted PER, nevertheless, they are minor in nature.

Nature Conservation

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

- (a) He has no objection to the application.
- (b) The applicant has submitted an ecological review and conducted a verification vegetation survey in support of the application. The review and survey concluded that the impacts of direct loss of habitats and the identified floral species of conservation importance in the Site would be low and acceptable in the absence of specific mitigation measures.

Visual and Landscape

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

Visual Aspect

- (a) The Site is located at an existing knoll. The proposal would require cut slopes to form platforms at about 60mPD and 65mPD. With the part of the knoll to be removed, the proposed development will be surrounded by the remaining hillslopes of the existing knoll to the north, west and south.
- (b) According to the LVIA, mitigation measures such as colour treatment of building facades, green roof, slope landscaping and screening/buffer planting are proposed to mitigate any potential visual impact (**Drawings A-6 and A-7**). Given the location of the proposed development and distance from major public viewers, most of the open sky view and scenic view from major public viewing points could be preserved (**Drawings A-8 to A-10**) and no significant visual impact is anticipated.

Landscape Aspect

- (c) She has no adverse comment from landscape planning perspective.
- (d) According to the aerial photo of 2021 (**Plan A-3**), the Site is hillside woodland/shrubland. It is situated in an area of rural landscape character predominated by woodland, service facilities, residential blocks, open storage and scattered graveyards. Having regard to the existing service reservoirs of similar scale and height to the southwest of the Site (**Plan A-1**), the proposed development is considered not incompatible with the landscape character of the surrounding area.
- (e) With reference to the planning statement and supplementary information, about 1,025 existing trees (including about 245 in inaccessible tree groups) are identified, of which 69 are proposed to be retained in situ, 4 trees (i.e. three *Aquilaria sinensis* and one *Camellia oleifera*) are proposed to be transplanted, and the remaining 952 trees of common or invasive species will be felled. A number of mitigation measures are proposed, including shrubs and climbers planting at slope berm planter with typical planting details on the proposed cut slopes, groundcover planting with proposed plant species on green roof of the proposed service reservoirs, and compensatory tree planting in compliance with DEVB TC(W) No. 4/2020 subject to actual site condition and constraints (**Drawings A-6 and A-7**). Given the nature of the proposed works, the landscape impact on existing landscape resources within the Site arising from the proposed development would be properly mitigated; the adequate landscape provisions proposed by the applicant would improve the landscape quality of the development.
- (f) Should the application be approved, the applicant should note the detailed comments at **Appendix IV**.

Drainage

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

He has no objection in principle to the proposed development under the presumption that the downstream drainage system to be developed under YLS Development – Stage 2 would have sufficient capacity to intercept the runoff from the proposed development.

Fire Safety

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

He has no objection in principle to the proposal subject to water supplies for firefighting and fire service installations being provided to his satisfaction. Should the application be approved, the applicant should note the detailed comments at **Appendix IV**.

Geotechnical

10.1.11 Comments of the Head of Geotechnical Engineering Office, CEDD (H(GEO), CEDD):

- (a) He has no adverse comment on the application.
- (b) According to the applicant's submission, it is noted that the applicant will carry out stability assessment on the man-made features that are likely to be affected by the proposed development, and slope stabilising measures would be carried out if found necessary. It is also noted that the newly-formed geotechnical features under the proposed development will be carried out according to current geotechnical standard. In this connection, the applicant should be reminded of the detailed comments at **Appendix IV**.

District Officer's Comments

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

His office has not received any comment from the locals.

10.2 The following government bureau/departments have no comment on the application:

- (a) Antiquities and Monuments Office, DEVB (AMO, DEVB);
- (b) Chief Building Surveyor/New Territories West, Buildings Department (CES/NTW, BD);
- (c) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and

- (d) Commissioner of Police (C of P).

11. Public Comments Received During the Statutory Publication Periods

- 11.1 On 14.1.2022, the application was published for public inspection. During the first three weeks of the statutory public inspection period, 9 comments were received from individuals, Kadoorie Farm & Botanic Garden Corporation (KFBG) and the registered owner of two lots within the Site.

Objecting Comments (6 Comments)

- 11.2 Six individuals object to the application mainly on the grounds that the proposal would lead to closure of an existing walking trail (**Plan A-2**) (**Appendices III-1 to III-4**); the proposal would affect the existing visual outlook from Tong Yan San Tsuen, affect the existing environment and damage existing burial grounds for indigenous villagers (**Appendix III-5**); the proposal is too close to nearby residences, the existing service reservoirs nearby could serve similar purpose, and approval of the application would set an undesirable precedent, etc. (**Appendix III-6**).

Comments Raising Concerns (3 Comments)

- 11.3 KFBG queries whether the proposal can be accommodated underground so as to minimise the potential visual and landscape impacts (**Appendix III-7**). An individual raises concerns on the lack of information concerning tree felling and loss of flora and fauna, the potential ecological and visual impacts arising from the proposal, and questions whether public amenities would be provided as part of the proposal (**Appendix III-8**). The registered owner of two lots within the Site raises concerns about resumption of private land, the potential impact on accessibility for one of the bisected lots and the potential geotechnical impact of the proposed development on the concerned lots (**Appendix III-9**).

12. Planning Considerations and Assessments

- 12.1 The application is for proposed service reservoirs with associated excavation and filling of land at the Site zoned “GB” on the OZP. The planning intention of the “GB” zone is to define 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. Although there is a general presumption against development within this zone, TPB PG-No. 10 allows for applications for public utility installations within the “GB” zone provided that the proposed development is essential and that no alternative sites are available. SDEV supports the proposal from the perspective of taking forward the HSK/HT NDA and YLS Development, as the proposed service reservoirs are essential infrastructures to meeting the long-term water demands arising from the two projects. The current siting of the proposed service reservoirs is the result of a through site-selection process carried out at the planning and engineering feasibility stage of the aforesaid development projects, in which the southern and eastern portions of the Site were considered most suitable for the proposed FWSR and FLWSR. The general location of the service reservoirs was established as early as 2016 and subsequently reflected in

the associated ODP and Revised RODP. Having further developed the details of the service reservoirs at the subsequent design stage, the scale and extent of the proposed service reservoirs have now been determined and reflected in the current application.

- 12.2 The Site is located on hilly terrain and mainly covered with vegetation. There are a number of existing service reservoirs built on open-air cut slopes to the west of the Site (**Plan A-1**). The applicant has provided justifications to substantiate the need to site the proposed service reservoirs at the Site, including the operational prerequisite for a high altitude so as to maintain steady and sufficient water pressure for the end users.
- 12.3 Various technical assessments (such as PER and LVIA) have been submitted in support of the application and there are no adverse comments from concerned departments, including DEP, C for T, CE/MN, DSD and H(GEO), CEDD. Adverse environmental, traffic, drainage and slope stability impacts arising from the proposal at both the construction and operational stages are not anticipated. According to the submitted tree survey, about 950 trees will be affected by the proposal but no Old and Valuable Trees are involved. Subject to existing site condition and detailed design, compensatory planting of not less than 1:1 will be provided at the Site and, where necessary, within HSK/HT NDA. Moreover, to ameliorate the potential visual impact, various mitigation measures, including proper protection/preservation of retained trees, landscaping of cut slopes, green roofs atop the service reservoirs, screening/vertical/buffer planting and visually sensitive treatment of retaining walls and structures (**Drawings A-6 and A-7**), are proposed, which would help the proposal to blend in with the surrounding landscape and visual setting. In this regard, DAFC and CTP/UD&L, PlanD have no objection/no adverse comment on the application from nature conservation, visual impact and landscape planning perspectives.
- 12.4 Overall, the proposed development is generally in line with the relevant criteria of TPB PG-No. 10 in that the proposed service reservoirs are essential to cope with the long-term water demand of the HSK/HT NDA and YLS Development, a thorough site-selection process has been undertaken and no better alternative sites are available, it would not cause adverse environmental, traffic, drainage, landscape and visual impacts, and would not adversely affect slope stability.
- 12.5 There is no previous application at the Site and no similar application within the subject “GB” zone. Given the study background pertaining to the proposal, the site selection considerations and justifications provided by the applicant, and the essentiality of the proposed development to two nearby NDAs, the circumstances of the application may be considered as unique.
- 12.6 There were 9 public comments objecting to/raising concerns on the application received during the statutory period. The planning considerations and assessments in paragraphs 12.1 to 12.5 above are relevant. In response to the public concern on closure of an existing walking trail, the applicant has submitted a revised layout (**Drawing A-2**) whereby a potential footpath is being explored as part of the proposal, which would be further developed at the detailed design stage. There are also no permitted burial grounds within the Site (**Plan A-1**). Lastly, should the application be approved, the applicant will be advised to liaise with the concerned landowners to address their concerns relating to the development.

13. Planning Department's Views

- 13.1 Based on the assessments made in paragraph 12, and having taken into account the public comments as summarised in paragraph 11 above, the Planning Department has no objection to the application.
- 13.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 4.3.2026, 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 condition of approval and advisory clauses are also suggested for Members' reference:

Approval condition

the submission and implementation of a proposal for water supply for firefighting and fire service installations to the satisfaction of the Director of Fire Services or of the Town Planning Board.

Advisory clauses

The recommended advisory clauses are at **Appendix IV**.

- 13.3 There is no strong planning reason to recommend rejection of the application.

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.
- 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 received on 5.1.2022
Appendix Ia	Supplementary Planning Statement
Appendix Ib	Supplementary Information received 12.1.2022
Appendix Ic	FI received on 24.2.2022
Appendix II	Relevant Extract of TPB PG-No. 10
Appendices III-1 to III-9	Public Comments Received During the Statutory Publication Period

Appendix IV	Recommended Advisory Clauses
Drawing A-1	Site Selection Plan
Drawing A-2	Site Layout Plan
Drawings A-3 to A-4	Sections
Drawing A-5	Proposed Extent of Excavation and Filling of Land
Drawings A-6 and A-7	Landscape Proposals
Drawings A-8 to A-10	Photomontages
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4a to A-4c	Site Photos

**PLANNING DEPARTMENT
MARCH 2022**