TPB Paper No. 10863

For Consideration by the Town Planning Board on 2.9.2022

REVIEW OF APPLICATION NO. A/YL-LFS/411 UNDER SECTION 17 OF THE TOWN PLANNING ORDINANCE

Temporary Warehouse for Storage of Construction Materials for a Period of 3 Years and Filling of Land in "Green Belt" Zone,
Lots 579 RP, 580, 581, 582, 583, 584 (Part) and 590 in D.D.129
and Adjoining Government Land, Lau Fau Shan, Yuen Long, New Territories

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1. Background

- 1.1 On 19.10.2021, the applicant, Lemgo Estates Limited represented by Mr. Lit Yingcheung, Edward, sought planning permission for temporary warehouse for storage of construction materials for a period of 3 years and filling of land at the application site (the Site) under section 16 of the Town Planning Ordinance (the Ordinance). The Site falls within an area zoned "Green Belt" ("GB") on the draft Lau Fau Shan and Tsim Bei Tsui Outline Zoning Plan (OZP) No. S/YL-LFS/10 at the time of application and the approved Lau Fau Shan and Tsim Bei Tsui OZP No. S/YL-LFS/11 currently in force (**Plan R-1**).
- 1.2 On 10.12.2021, the Rural and New Town Planning Committee (the RNTPC) of the Town Planning Board (the Board) decided to reject the application and the reasons were:
 - (a) the applied development was not in line with the planning intention of the "GB" zone, which was 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 was a general presumption against development within this zone. There was no strong planning justification in the submission for a departure from the planning intention;
 - (b) the applied development was not in line with the 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) in that the applicant failed to demonstrate that the applied development would not have significant adverse environmental and landscape impacts on the surrounding areas; and
 - (c) approval of the application would set an undesirable precedent for similar applications for warehouse use 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 There is no change in the development parameters in the review application. To recapitulate, the site area is about 5,706m², including Government Land of about 1,250m² (21.9%). As shown on the layout plan at Drawing A-1 of **Annex A**, the proposal comprises 7 structures of 1 storey (2.44m to 7.54m) high, with a total floor area of about 2,886m². 2 structures are used for warehouses (each with a canopy

attached on the side of their entrances) and 1 for open-side canopy, all of which are for storage of construction materials. The remaining 2 structures are used for latrines. A loading/unloading space for medium goods vehicle would be provided. No parking spaces would be provided. Moreover, the entire Site (about 5,706m²) has been concrete-paved for about 0.3m in thickness. In addition, 2 concrete platforms (with an area of about 41.8m² and 180m² respectively, and a thickness of about 1.28m) have been formed underneath the warehouse at the north, and the open-side canopy respectively (Drawing A-2 of **Annex A**). The land filling under application is to regularise the hard-paving on-site.

- 1.4 The Site is currently not subject to active enforcement action. Should there be sufficient evidence to form an opinion of unauthorised development (UD) under the Ordinance, planning enforcement action would be instigated as appropriate.
- 1.5 For Members' reference, the following documents are attached:
 - (a) RNTPC Paper No. A/YL-LFS/411 (Annex A)
 - (b) Extract of minutes of the RNTPC Meeting held on 10.12.2021 (Annex B)
 - (c) Secretary of the Board's letter dated 24.12.2021 (Annex C)

2. Application for Review

- On 12.1.2022, the applicant applied, under section 17(1) of the Ordinance, for a review of the RNTPC's decision to reject the application (**Annex D-1**). On 8.6.2022, the applicant submitted written representation (**Annex D-2**) providing justifications in support of the review.
- 2.2 The review application was originally scheduled for consideration by the Board on 8.4.2022. Upon the request of the applicant, the Board agreed to defer a decision on the review application for two months on 8.4.2022. With the written representation submitted, the review application is scheduled for consideration by the Board at this meeting.

3. Justifications from the Applicant

The justifications put forth by the applicant in support of the review application are detailed in the submission at **Annex D-2**. They can be summarised as follows:

- (a) Although the Site falls within the "GB" zone, the landscape and ecological value of the Site is not as significant when compared to other parts of the "GB" zone. The Site had been used as pig breeding farm since the 1960s and was later converted to storage use. There is currently no tree and vegetation within the Site, and therefore no clearance of existing natural vegetation is involved. The applied development would not affect existing natural landscape, nor would it cause any adverse visual impact on the surrounding environment.
- (b) The applied development would not set an unfavorable precedent, for storage use together with the structures has been in existence at the Site since the 1990s. Each application should be considered on its own merits, which include site history, scale and compatibility with the surrounding environment.

- (c) The applied development would not cause any traffic problem to the surrounding areas. Both the Transport Department and the Highways Department have no adverse comment on the application.
- (d) The Environmental Protection Department confirmed that there is no substantiated environmental complaint in the past 3 years. The alleged residential dwelling located to the immediate southeast is merely an abandoned farm structure that belongs to one of the directors' of the applicant company. The said farm structure has been abandoned ever since the pig breeding licence was returned to the Agriculture, Fisheries and Conservation Department (AFCD) in around 1995. As such, the environmental impact on the surroundings is minimal.
- (e) There are quite a number of warehouses and open storage yards in the vicinity of the Site. The applied development is not incompatible with the surrounding area.

4. The Section 16 Application

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

4.1 The situation of the Site and its surrounding areas at the time of the consideration of the section 16 application by the RNTPC was described in paragraphs 8.1 and 8.2 of **Annex A**. There has not been any major change in the planning circumstances of the area since then.

4.2 The Site is:

- (a) entirely concrete-paved and erected with some of the temporary structures under application. It is occupied by the applied use and open storage without valid planning permission; and
- (b) directly abutting and accessible from Deep Bay Road at its west.
- 4.3 The surrounding areas have the following characteristics:
 - (a) to the north are a warehouse and shrubland;
 - (b) to the east is shrubland intermixed with graves and ruins;
 - (c) to the south and southeast are vacant land, shrubland, a pond, a village house and ruins; and
 - (d) to the west are a recycling yard, a trailer park, vacant land and shrubland. To the further west across Deep Bay Road is shrubland intermixed with graves.

Planning Intention

4.4 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.
- 4.5 As filling of land/pond or excavation of land 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.

Town Planning Board Guidelines

4.6 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 detailed at Appendix II of **Annex A**.

Previous Application

4.7 There is no previous application at the Site.

Similar Applications

- 4.8 There were 8 similar applications (No. A/YL-LFS/90, 130, 200, 252, 259, 262, 280 and 346) involving 5 sites for temporary warehouse for storage of various materials with or without open storage use within the same "GB" zone at the time of considering the section 16 application, which was mentioned in paragraph 7 of **Annex A**. Since then, there has been one additional similar application (No. A/YL-LFS/422) for temporary warehouse for storage of electronic goods for a period of 3 years and filling of land within the same "GB" zone. Details of the applications are summarised at **Annex E** and their locations are shown on **Plan R-1**.
- 4.9 Applications No. A/YL-LFS/90 and 130 involving the same site for temporary warehouse were dismissed by the Appeal Board on appeal in 2003 and 2007 respectively on grounds of insufficient justifications for departure from the planning intention, incompatibility with the surrounding rural character, failure to demonstrate no adverse environmental and/or drainage impacts, and/or setting undesirable precedent.
- 4.10 Applications No. A/YL-LFS/259, 280 and 346 involving 2 sites for temporary warehouse with or without open storage use were rejected by the RNTPC between 2014 and 2019 mainly on grounds of not in line with the planning intention, not in line with the TPB PG-No. 10 due to incompatibility with the surrounding environment and/or failure to demonstrate no adverse landscape impacts, failure to demonstrate no adverse traffic impact, and/or setting undesirable precedent.
- 4.11 Applications No. A/YL-LFS/200, 252, 262 and 422 involving 3 sites for temporary warehouse with or without open storage use and filling of land within the Wetland Buffer Area were rejected by the RNTPC or the Board on review between 2010 and 2022 mainly on similar grounds as stated in paragraph 4.10 above, and/or not in line with the then TPB PG-No. 12B for Application for Developments within the Deep Bay Area under Section 16 of the Ordinance.

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

5.1 Comments on the section 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 new/updated comments are summarised as follows:

Environment

- 5.2.1 Comments of the Director of Environmental Protection (DEP):
 - (a) Noting that there are a residential dwelling located to the immediate southeast (less than 10m away) (**Plan R-2**) and other residential dwellings within 100m from the boundary of the Site (**Plan R-5**), he maintains his previous comments of not supporting the application since the applied use involves heavy vehicles and environmental nuisances are expected.
 - (b) There is no substantiated environmental complaint pertaining to the Site received in the past 3 years.

Agriculture

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

The Site once formed part of a pig farm covered by Livestock Keeping Licence issued by AFCD. The licence was first issued for the pig farm on 6.11.2003. The said pig farm ceased operation on 14.8.2007.

Land Administration

- 5.2.3 Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD):
 - (a) The building on Lot 579 S.A in D.D.129 to the immediate southeast of the Site (**Plan R-2 and** Photos 12 and 13 of **Plan R-4e**) is a New Territories Exempted House (NTEH) covered by Building Licence No. 319.
 - (b) He maintains his previous comments on the section 16 application as stated in paragraph 10.1.1 of **Annex A**, which are recapitulated below:
 - (i) The Site was previously covered by Modification of Tenancy No./Letter of Approval No. MNT 19865 and Letter of Approval No. MT/LM 11688 (**Plan R-2**). For Modification of Tenancy No. MNT 19865, the permitted user of the structures were private residential, porch and watchman shed. For Letter of Approval No. MNT 19865, the permitted user of the structures were pigsty, chicken shed and agricultural store. For Letter of Approval No. MT/LM 11688, the permitted user of the structures were agricultural store, pigsty and porch. However, it was revealed in 2020 that the area covered by the above permit had been altered and extended, and the purposes of use of the structures had been changed. As such, the above permits were cancelled by his office

on 26.2.2021.

- (ii) His detailed comments are at **Annex G**.
- 5.3 The following government department maintains its previous comments of having reservation on the section 16 application in paragraph 10.1 of **Annex A**, which are recapitulated below:

Landscaping

- 5.3.1 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):
 - (a) She has reservation on the application from landscape planning perspective.
 - (b) The Site is located in an area of rural coastal plain landscape character predominated by tree groups, woodlands and village houses with temporary structures and warehouse observed in the proximity. The Site is hard paved with existing temporary structures generally along the site boundary and no existing vegetation is found in the Site.
 - (c) However, by comparing the aerial photos taken in 2013 to 2014 (**Plans R-3b and R-3c**), vegetation clearance and hard paving for making vehicular access to Deep Bay Road were observed within the Site. Significant landscape impact had taken place.
 - (d) Approval of the application may encourage similar developments in the area, and the cumulative impact of which would result in further degradation of the landscape character and quality of the surrounding environment and undermine the planning intention of the "GB" zone.
- 5.4 The following government departments maintain their previous views on the section 16 application as stated in paragraph 10.1 of **Annex A**:
 - (a) Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD);
 - (b) Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD):
 - (c) Director of Fire Services (D of FS);
 - (d) Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD);
 - (e) Commissioner for Transport (C for T); and
 - (f) District Officer/Yuen Long, Home Affairs Department (DO/YL, HAD).
- 5.5 The following government departments maintain their previous views of having no comment on the application as stated in paragraph 10.2 of **Annex A**:
 - (a) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
 - (b) Chief Engineer/Land Works, Civil Engineering and Development Department (CE/LW, CEDD);
 - (c) Head of Geotechnical Engineering Office, CEDD (H(GEO), CEDD);

- (d) Project Manager (West), CEDD (PM(W), CEDD);
- (e) Commissioner of Police (C of P); and
- (f) Director of Electrical and Mechanical Services (DEMS).

6. <u>Public Comments on the Review Application Received During Statutory Publication Periods</u>

- 6.1 On 21.1.2022 and 17.6.2022, the application and the written representation were respectively published for public inspection. During the statutory public inspection periods, a total of 6 public comments, including 2 from the Kadoorie Farm and Botanic Garden Corporation and 4 from 2 individuals (Annexes F-1 to F-6) were received objecting to the application on grounds that the applied development is not in line with the planning intention of the "GB" zone; approval of the application would set an undesirable precedent; a similar application (No. A/YL-LFS/280) in the vicinity of the Site was rejected by the RNTPC; the fact that the Site had already been illegally vandalised for storage use is not an acceptable justification; and the applied development would generate adverse traffic, environmental and fire safety impacts.
- 6.2 A total of 3 public comments, all objecting to the application, were received at the section 16 application stage as set out 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 10.12.2021 to reject the subject application for temporary warehouse for storage of construction materials for a period of 3 years and filling of land at the Site zoned "GB" on the OZP (**Plan R-1**). The application was rejected for the reasons that (1) the applied development was not in line with the planning intention of the "GB" zone; (2) the applied development was not in line with the TPB PG-No. 10 in that the applicant failed to demonstrate that the applied development would not have significant adverse environmental and landscape impacts on the surrounding areas; and (3) approval of the application would set an undesirable precedent for similar applications for warehouse use within the "GB" zone.

Justifications for the Review Application

- 7.2 In support of the review application, the applicant put forward justifications that (1) the landscape and ecological value of the Site is not as significant when compared to other parts of the "GB" zone because there is currently no tree and vegetation within the Site; (2) the environmental impact caused by the applied development is minimal because the alleged sensitive receiver to the southeast of the Site is merely an abandoned farm structure; (3) the applied development is not incompatible with the surrounding area as there are a number of warehouses and open storage yards in the vicinity of the Site; (4) the applied development would not cause any traffic problem to the surrounding areas; and (5) the applied development would not set an undesirable precedent because storage use together with the structures has been in existence at the Site since the 1990s.
- 7.3 Since the consideration of the subject application by the RNTPC on 10.12.2021, there has been no major change in planning circumstances. Having considered the review

submission, the planning considerations and assessments on the review application are appended below.

Planning Intention of the "GB" Zone

7.4 The Site falls within 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. Moreover, filling of land within the "GB" zone requires planning permission from the Board as it may cause adverse drainage impacts on the adjacent areas and adverse impacts on the natural environment. The applied development is not in line with the planning intention of the "GB" zone. Since the Site is located at the centre of the "GB" zone (**Plan R-1**), the applied use of temporary warehouse with associated land filling would affect the integrity of the "GB" zone. There is no strong planning justification given in the submission for a departure of such planning intention.

Adverse Landscape Impact

7.5 In Justification (1) of the review submission, the applicant claims that the landscape and ecological value of the Site is not as significant when compared to other parts of the "GB" zone because there is currently no tree and vegetation within the Site. In this regard, while DAFC has no adverse comment on the application from ecological perspective, CTP/UD&L of PlanD has reservation on the application from landscape planning perspective, as significant landscape impact had taken place between 2013 and 2014 when the northwestern portion of the Site was cleared of vegetation and hard paved for provision of an access to Deep Bay Road (Plans R-3b and R-3c). Approval of the application may encourage similar developments in the area, and the cumulative impact of which would result in further degradation of the landscape character and quality of the surrounding environment and undermine the planning intention of the "GB" zone.

Adverse Environmental Impact

7.6 In Justification (2) of the review submission, the applicant claims that the alleged sensitive receiver (i.e. residential dwelling) located to the immediate southeast of the Site is merely an abandoned farm structure. In this regard, DLO/YL of LandsD advised that the building on Lot 579 S.A in D.D.129 (Plan R-2 and Photos 12 and 13 of Plan R-4e) is an NTEH. There are also other residential dwellings located within 100m from the boundary of the Site (Plan R-5). In this connection, DEP maintains his view of not supporting the application as the applied use involves operation of heavy vehicles (Photo 4 of Plan R-4b), and environmental nuisance is expected.

Not in line with TPB PG-No. 10

7.7 As stated in TPB PG-No. 10, an application for new development within "GB" zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The development and its vehicular access road should not involve extensive clearance of existing natural vegetation and affect the existing natural landscape. The development should not be the source of pollution. In view of the discussion in paragraphs 7.5 and 7.6 above, the applied development is considered not in line with TPB PG-No. 10.

Land Use Compatibility

7.8 Regarding Justification (3) of the review submission, the Site is situated in an area of rural character and predominated by shrubland intermixed with temporary structures, graves, shrubland and village house. Although there are warehouses, recycling yard and vehicle park in the vicinity, they are suspected UDs subject to enforcement actions by the Planning Authority. As stated in TPB PG-No. 10, the design and layout of any development within "GB" zone should be compatible with the surrounding area. The applied development, which is industrial in nature with concrete paving covering the entire Site, is considered not compatible with the surrounding environment.

No Adverse Traffic Impact

7.9 In Justification (4) of the review submission, the applicant states that the applied development would not cause any traffic problem. In this regard, traffic impact was not a rejection reason for the section 16 application.

Setting Undesirable Precedent

- 7.10 There is no previous planning application covering the Site. Also, no approval for similar applications for warehouse use has been granted by the RNTPC or the Board within the same "GB" zone. Approval of the application would set an undesirable precedent and encourage proliferation of warehouses within the same "GB" zone. The cumulative effect of approving such similar applications would result in a general degradation of the rural environment of the area, thereby frustrating the planning intention of the "GB" zone. Rejecting the subject application is in line with the previous decisions of the RNTPC.
- 7.11 In Justification (5) of the review submission, the applicant argues that the storage use together with its structures has been in existence at the Site since the 1990s, and hence the approval of the application would not set an undesirable precedent. Nevertheless, the applicant has not provided any evidence to substantiate its claim. On the other hand, DAFC advised that the Site formed part of a pig farm covered by Livestock Keeping Licence during November 2003 and August 2007. Moreover, aerial photos between 2013 and 2014 (Plans R-3b and R-3c) reveal that the Site has undergone redevelopment, with a new access connecting to Deep Bay Road. Furthermore, the uncovered area of the Site is found to have been used for open storage (Photo 11 of Plan R-4d).
- 7.12 In view of the assessments in paragraphs 7.4 to 7.11 above, there is no exceptional planning circumstance that warrants special consideration of the review application.

Other Departmental Comments

7.13 Other concerned departments including C for T, CE/MN of DSD, H(GEO) of CEDD and D of FS have no objection to or no comment on the applied development from traffic, drainage, geotechnical and fire safety perspectives.

Public Comments

7.14 Regarding the public comments objecting to the review application on the grounds as

detailed in paragraph 6 above, the planning considerations and assessments in paragraphs 7.1 to 7.13 above are relevant.

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 has been no major change in the planning circumstances since the consideration of the subject application by the RNTPC on 10.12.2021, the Planning Department maintains its previous view of not supporting the review application for the following reasons:
 - (a) the applied development is not in line with the planning intention of the "Green Belt" ("GB") zone, which is primarily for defining the limits of urban and suburban 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 the planning intention;
 - (b) the applied development is not in line with the 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) in that the applicant fails to demonstrate that the applied development would not have significant adverse environmental and landscape impacts on the surrounding areas; and
 - (c) approval of the application would set an undesirable precedent for similar applications for warehouse use 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, it is suggested that the permission shall be valid on a temporary basis for a period of 3 years until **2.9.2025**. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval Conditions

- (a) no operation from 5:00 p.m. to 10:00 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;
- (b) no operation on Saturdays, Sundays and public holidays, as proposed by the applicant, is allowed on the Site during the planning approval period;
- (c) no vehicle exceeding 24 tonnes, including heavy goods vehicle and container trailer/tractor, as defined in the Road Traffic Ordinance, is allowed to enter/exit or to be parked/stored on the Site at any time during the planning approval period;
- (d) no open storage or workshop activities should be carried out on the Site at any time during the planning approval period;

- (e) the submission of a drainage proposal within **6 months** from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by **2.3.2023**;
- (f) in relation to (e) above, the implementation of the drainage proposal within **9** months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by **2.6.2023**;
- (g) in relation to (f) above, the implemented drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (h) the submission of a fire service installations proposal within **6 months** from the date of the planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by **2.3.2023**;
- (i) in relation to condition (h) above, the implementation of the fire service installations proposal within **9 months** from the date of the planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by **2.6.2023**;
- (j) if any of the above planning condition (a), (b), (c), (d) or (g) 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;
- (k) if any of the above planning condition (e), (f), (h) or (i) is not complied with by the above specified date, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice; and
- (l) upon expiry of the planning permission, the reinstatement of the Site to an amenity area to the satisfaction of the Director of Planning or of the Town Planning Board.

Advisory Clauses

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

9. <u>Decision Sought</u>

- 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, and the period of which the permission should be valid on a temporary basis.

10. Attachments

Plan R-1 Location Plan with Similar Applications

Plan R-2 Site Plan

Plans R-3a to 3d Aerial Photos Taken in 2021, 2014, 2013 and 1990

Plans R-4a to 4e Site Photos

Plan R-5 Residential Dwellings in the Vicinity of the Site

Annex A RNTPC Paper No. A/YL-LFS/411

Annex B Extract of Minutes of the RNTPC Meeting Held on

10.12.2021

Annex C Secretary of the Board's Letter Dated 24.12.2021

Annex D-1 Letter Dated 12.1.2022 from the Applicant Applying for

Review

Annex D-2 Written Representation of the Applicant

Annex E Similar Applications within/straddling the Same "GB"

Zone

Annexes F-1 to F-6 Public Comments Received During the Statutory

Publication Periods of the Review Application

Annex G Recommended Advisory Clauses

PLANNING DEPARTMENT AUGUST 2022