

TPB Paper No. 10691

**For Consideration by
the Town Planning Board on 13.11.2020**

**DRAFT HOI HA OUTLINE ZONING PLAN NO. S/NE-HH/3
CONSIDERATION OF REPRESENTATIONS NO. TPB/R/S/NE-HH/3-1 TO 20
AND COMMENTS NO. TPB/R/S/NE-HH/3-C1 TO C60**

**DRAFT HOI HA OUTLINE ZONING PLAN NO. S/NE-HH/3
 CONSIDERATION OF REPRESENTATIONS NO. TPB/R/S/NE-HH/3-1 TO 20
 AND COMMENTS NO. TPB/R/S/NE-HH/3-C1 TO C60**

Subject of Representations (Amendment Item)	Representers (No. TPB/R/S/NE-HH/3-)	Commenters (No. TPB/R/S/NE-HH/3-)
<p><u>Item A</u> Rezoning of an area to the west of the village cluster of Hoi Ha from “Village Type Development” (“V”) to “Green Belt(1)” (“GB(1)”)</p> <p><u>Item B</u> Rezoning of an area to the east of the village cluster of Hoi Ha from “V” to “Coastal Protection Area” (“CPA”)</p>	<p>Total: 20</p> <p><u>Support</u></p> <p><i>Items A and B</i> R1: Individual</p> <p><i>Item B but Oppose/ Provide Adverse Representations on Item A</i> R4 (Part): The Conservancy Association R5 (Part): Hong Kong Bird Watching Society</p> <p><u>Oppose/do not support/raise adverse representations</u></p> <p><i>Items A and B</i></p> <p>R2: The Hong Kong Countryside Foundation</p> <p>R3: Kadoorie Farm and Botanic Garden</p> <p>R4 (Part): The Conservancy Association</p> <p>R5 (Part): Hong Kong Bird Watching Society</p> <p>R6: Designing Hong Kong Limited</p> <p>R7: Friends of Hoi Ha</p> <p>R8: Friends of Sai Kung</p> <p>R9 to R15: Individuals</p>	<p>Total: 60</p> <p><u>Support R3 to R8 and Oppose R16 to R19</u> C1 to C53: Individuals</p> <p><u>Oppose R16 to R19</u> C54: The Conservancy Association (<i>i.e.</i> R4)</p> <p><u>Support R2 to R6</u> C55: Hong Kong Bird Watching Society (<i>i.e.</i> R5)</p> <p><u>Support R3 to R4</u> C57: Individual</p> <p><u>Support R3 to R5</u> C58: Individual</p> <p><u>Support R3 to R8</u> C60: Individual</p> <p><u>Provide views (2)</u> C56: 港九工團聯合總會</p> <p>C59: Individual (<i>i.e.</i> R1)</p>

	<p>R16: 新界鄉議局</p> <p>R17: 西貢北約鄉事委員會</p> <p>R18 and R19: 海下村原居民代表和居民代表</p> <p><i>Item A only (1)</i></p> <p>R20: World Wide Fund For Nature Hong Kong</p>	
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Note: The names of all representers and commenters are at **Annex VI**. Soft copy of their submissions is sent to the Town Planning Board Members via electronic means; and is also available for public inspection at the Town Planning Board's website at https://www.info.gov.hk/tpb/en/plan_making/S_NE-HH_3.html and the Planning Enquiry Counters of the Planning Department (PlanD) in North Point and Sha Tin. A set of hard copy is deposited at the Town Planning Board Secretariat for Members' inspection.

1. **Introduction**

- 1.1 On 3.4.2020, the draft Hoi Ha Outline Zoning Plan (OZP) No. S/NE-HH/3 (the Plan) at **Annex I**, together with the draft Pak Lap OZP and So Lo Pun OZP, was exhibited for public inspection under section 7 of the Town Planning Ordinance (the Ordinance or TPO). The amendments to the Plan are set out in the Schedule of Amendments at **Annex II** and the locations of the amendment items are shown on **Plan H-1**.
- 1.2 During the two-month statutory exhibition period, a total of 20 valid representations were received. On 16.6.2020, the representations were published for public comments. A total of 60 valid comments were received.
- 1.3 As a significant number of representations and comments on the Pak Lap, Hoi Ha and So Lo Pun OZPs are submitted by the same representers and commenters (i.e. 16 representations and 60 comments), the Town Planning Board (the Board), on 14.8.2020, agreed to consider the representations and comments on the three OZPs collectively in one group. This paper is to provide the Board with information for consideration of the representations and comments on the draft Hoi Ha OZP. The representers and commenters have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.

2. **Background**

Preparation of OZP

- 2.1 Hoi Ha is one of the country park enclaves (CPEs) for which statutory plans were prepared under the Ordinance. The draft development permission area plan

(DPA Plan) covering Hoi Ha was published on 30.9.2010, which was interim in nature and subsequently replaced by OZP. On 27.9.2013, the draft Hoi Ha OZP No. S/NE-HH/1 was exhibited for public inspection under section 5 of the Ordinance. After giving consideration to the representations and comments from April to June 2014 and further representations and the related representations and comments on 21.11.2014, the Board, on 19.12.2014, agreed to submit, under section 8 of the Ordinance, the draft Hoi Ha OZP, together with the draft OZPs for Pak Lap and So Lo Pun, to the Chief Executive in Council (CE in C) for approval. On 3.2.2015, the CE in C under section 9(1)(a) of the Ordinance, approved all three draft OZPs. On 13.2.2015, the approved OZPs were exhibited for public inspection under section 9(5) of the Ordinance.

Judicial Review

- 2.2 On 18.2.2015, a judicial review (JR) application was lodged by Chan Ka Lam against (i) the decision of the CE in C made on 3.2.2015 to approve the three draft OZPs for Pak Lap, Hoi Ha and So Lo Pun; and (ii) the decision of the Board made on 19.12.2014 to submit the three draft OZPs to the CE in C for approval.
- 2.3 The Court of First Instance (CFI) allowed the JR on 24.11.2017 quashing the said decisions of the CE in C and the Board with a direction that all three draft OZPs be remitted to the Board for reconsideration of the relevant issues.
- 2.4 According to the CFI's Judgment, the JR was allowed on the grounds that the Board failed to carry out its duty to inquire, specifically on two issues, namely, the genuine need for Small House development (the genuine need issue) (for all three OZPs) and the accuracy of the base map (the maps issue) (for Hoi Ha OZP only), and such failure had tainted the CE in C's decision. On both issues, the Court holds the view that the deliberation and reasons given by the Board did not demonstrate that the Board had properly inquired into the representations in respect of the three OZPs in making its decisions on the representations. For the genuine need issue, the Court holds the view that the Board had not explained on what basis it had treated the forecast figures of the Small House demand to provide support for showing the needs of "V" zoning, whether and why it had accepted or rejected the validity of those extensive representations made under the question on the genuine need issue, and how the representations had affected its view on planning the size of the "V" zones. For the maps issue, the Court considers that the Board had not properly inquired into and answered the questions raised in the representations regarding the accuracy of the map base for the Hoi Ha OZP.
- 2.5 The CFI also made findings and rulings in favour of the Board as follows:
 - (a) for the purpose of making the planning decision, it was not necessary for the Board to inquire into and resolve the matters related to adverse environmental impacts caused by septic tank system installations as far as it accepted that the Small House application scheme could sufficiently address the issue;

- (b) the Board had adequately inquired into the cumulative impact on conservation and had taken into account the representations on this issue when making a planning judgement which was to strike a balance between conservation and compatible development;
- (c) among the three OZPs, there was no inconsistency in zoning with reference to their circumstances as each of the zonings was essentially the result of balancing and accommodation between various factors which might themselves be in conflict or tension. Where the overall balance of factors as between one area and another resulted in a different zoning as in the three OZPs, it could not be characterised as “inconsistency” in public law sense;
- (d) the factors that the Board and CE in C took into account of (or not) were a matter of discretionary judgement which the CFI would not interfere unless there is *Wednesbury* irrationality;
- (e) for planning purposes, it was reasonable for the Board to start off by looking at the right of indigenous villagers to apply for building Small House and the forecasted demands on the side of the scale of development needs. It was not *Wednesbury* unreasonable for the Board to regard that as a relevant factor to be taken into account;
- (f) the Board did seek to plan by striking a balance between conservation and development needs. The allegation that the Board failed to take into account CPE Policy was rejected; and
- (g) for the maps issue, given the reason adopted by the Board that the draft Hoi Ha OZP was not prepared based on inaccurate survey maps, it was not irrational for the Board to submit the OZP to the CE in C for approval.

Amendments to the OZP

- 2.6 To comply with the CFI’s Judgment, a review on the genuine need for Small House development for the three OZPs and the maps issue for Hoi Ha OZP has been undertaken. On the genuine need issue, the review has taken into account the principles for designating the “V” zone and relevant information for assessing the Small House need of indigenous villagers for the areas concerned. Additional/updated information including (i) the actual number of Small House grant applications received/approved/rejected by Lands Department (LandsD) since 2010, and the latest number of outstanding Small House grant applications being considered by LandsD and (ii) the 10-year Small House demand forecasts starting from 2010 provided by the Indigenous Village Representatives (IIRs), and breakdown of such forecasts were obtained to facilitate the Board’s deliberation on the issue and making further inquiries as necessary. Other relevant information including the latest estimation of land available for Small House development within the “V” zone, and the population figures and

infrastructural provision in the Hoi Ha area has also been provided for the Board's consideration.

- 2.7 The Board, on 3.3.2020, considered the reviews and reconsidered the three OZPs. The Board well noted that there is no practical means available for determining the genuine need for Small House development at the planning stage, and best available information has already been obtained relating to the Small House demand in the review. The Board is also fully aware that there is no mechanism to verify the figures in the Small House demand forecast provided by the IIRs at the planning stage. The status of the Small House applicant would be verified by respective District Lands Offices (DLOs) during the processing of the Small House grant applications. The Board noted the findings in respect of the genuine need issue on the OZP that with a view to further enhancing the balance between nature conservation and meeting the Small House need of the villagers, the extent to the "V" zone could be suitably adjusted.
- 2.8 On the maps issue, the Board noted that the latest version of map base available from Survey and Mapping Office (SMO) of LandsD has been adopted for preparing the Hoi Ha OZP. However, the map base might not fully reflect the prevailing situation due to on-going changes in topographic features over time and the selection and generalisation of features in making maps to address cartographic limitations. Notwithstanding that, planning control under OZP was not affected because the map base was only a locational reference and planning control was exercised based on the physical features/activities on the ground that mattered instead of the map base of the OZP.
- 2.9 Having considered the review of the said issues, the Board agreed to make amendments under section 7 of the Ordinance to rezone an area to the west of the village cluster at Hoi Ha from "V" to "GB(1)" (Item A) and an area to the east of the village cluster from "V" to "Coastal Protection Area" (Item B). The relevant TPB Paper No. 10626 is available at the Board's website at https://www.info.gov.hk/tpb/en/papers/TPB/STN/S_NE-HH_2A/S_NE-HH_2A_Main%20Paper.pdf and at **Annex III(a)** and the minutes of the meeting is at **Annex III(b)**. On 3.4.2020, the draft Hoi Ha OZP No. S/NE-HH/3 was exhibited for public inspection under section 7 of the Ordinance. A total of 20 valid representations and 60 valid comments were received.
- 2.10 For background information, a total of 10,824 representations, 3,671 comments and 36 further representations were received in respect of the draft Hoi Ha OZP No. S/NE-HH/1, of which most of them were related to the designation of "V" zone and some also touched upon the maps issue. A summary of these previous representations, comments and further representations is at **Annex IV**. All of these previous representers/commenters/ further representers have been informed of the Board's decision on 3.3.2020 and advised that they could make representation in respect of this round of amendments, and 27 of them have made representations and/or comments on this round of amendments.

3. Local Consultation

The amendments to the OZP were presented to Sai Kung North Rural Committee (SKNRC) and the Planning, Housing and Works Committee of Tai Po District Council (PHW, TPDC) at their meetings on 16.4.2020 and 11.5.2020 respectively. SKNRC opposed the amendments mainly on the grounds that the reduced “V” zone was insufficient to meet the Small House demand of the villagers. For PHW, TPDC, a member shared the same views as SKNRC and opposed the amendments. Another member raised concern that Small House development in the reduced “V” zone would still cause adverse environmental and ecological impacts on the surrounding environment and the water quality of Hoi Ha Wan Marine Park (HHWMP). The relevant minutes of the meeting of PHW, TPDC is at **Annex V**. Both SKNRC and PHW, TPDC were invited to submit representations on the amendments in writing to the Secretary of the Board during the statutory exhibition period of the OZP. SKNRC subsequently submitted a representation (**R17**) setting out its grounds of objection to the amendments.

4. The Representation Sites and their Surrounding Areas

4.1 The Representation Sites and their Surrounding Areas (Plans H-1, H-2, H-4a and H-4b)

Representation Site under Item A

4.1.1 The Site (with an area of 0.2 ha) is located to the west of the village cluster of Hoi Ha. It consists mainly of abandoned farmland now covered in lowland forest and mixed shrubland. It forms part of the “GB(1)” zone which serves as an ecological buffer between village development and the rocky stream along the western boundary of the OZP, and helps to protect the landscape resources of this area.

Representation Site under Item B

4.1.2 The Site (with an area of 0.1 ha) is located to the east of the village cluster of Hoi Ha. It consists mainly of abandoned farmland now covered by disturbed vegetation with trees and shrubs of common species and overgrown with weedy climbers. It forms part of the “CPA” zone along the coastal area to the north, which serves the function to protect and retain the coastlines and the sensitive coastal environment.

The Surrounding Areas

4.1.3 Hoi Ha is encircled by Sai Kung West Country Park on three sides with remaining northern side fronting the Hoi Ha Wan, which is a designated Marine Park as well as a Site of Special Scientific Interest (SSSI). Hoi Ha Village is the only recognized village in Hoi Ha. The remaining areas surrounding the Sites are predominantly in rural landscape character comprising woodland, shrubland and fallow agricultural land.

4.2 Planning Intentions

4.2.1 The planning intention of “GB(1)” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl. There is a general presumption against development within this zone. In general, only developments that are needed to support the conservation of the existing natural landscape, ecological features or scenic quality of the area or are essential infrastructure projects with overriding public interest may be permitted.

4.2.2 The planning intention of “CPA” zone is intended to protect and retain the coastlines and the sensitive coastal environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological significance, with a minimum of built development. There is a general presumption against development in this zone. In general, only developments that are needed to support the conservation of the existing natural landscape or scenic quality of the area or are essential infrastructure projects with overriding public interest may be permitted.

5. The Representations and Comments on Representations

5.1 Subject of Representations

5.1.1 There are a total of 20 valid representations, including a supportive representation to both Items (**R1**), two representations indicating support to Item B but oppose/provide adverse representations on Item A (**R4** and **R5**), 16 adverse representations on both Items (**R2, R3, R6 to R19**) (four of them indicate welcome to the reduction of “V” zone) and one adverse representation on Item A only (**R20**). The list of representers is at **Annex VI**.

5.1.2 The major grounds of representations as well as their proposals, and PlanD’s responses, in consultation with the relevant Government departments, are at **Annex VII** and summarised in paragraphs 5.2 and 5.3 below.

5.2 Major Grounds of and Responses to Supportive Representations

R1 supports Items A and B, and **R4** (part) and **R5** (part) support Item B.

Major Grounds	Representations
(1) The conservation-oriented approach as adopted in drawing up the land use proposals for the area is supported.	R1
(2) The number of Small Houses that could be provided in the “V” zone upon amendment is more than adequate.	

(3) There is a stream in the area under Item A and the “GB” zoning under the item serves as an ecological buffer.	
(4) Item B is clearly designed to protect the marine park from effluent.	
(5) Support the conservation approach under amendment Item B.	R4 (part) and R5 (part)
Response	
The supportive views are noted.	

5.3 Major Grounds/Proposals of and Responses to Adverse Representations

5.3.1 All **R2, R3, R4(Part), R5(Part), R6 to R20** provide adverse representations.

5.3.2 *Genuine Need for Small House Development*

Major Grounds	Representations
(1) The Board has failed to make a meaningful review of /proper inquiry into the data and information relating to genuine need for housing of indigenous villagers which has been highlighted as its statutory duty in the Court’s Judgment on the previous JR. The Small House demand forecast by IIRs is not verified and the extent of “V” zone upon amendment is determined without demonstrating the genuine need.	R2, R3, R4(Part), R5(Part), R6 to R14
(2) The Board has not taken into account the following factors when considering the genuine need for housing:	
(a) the success rate of Small House applications in the past 10 years was only about 15%;	R2, R6, R7, R8 and R14
(b) infrastructure in Hoi Ha is insufficient to support further development;	R2, R11, R12 and R14
(c) there is no evidence to indicate the overseas residents have demonstrated a genuine intention to return to Hong Kong to live;	R2, R7, R8 and R14
(d) none of the houses built in the last 20 years in Hoi Ha is presently occupied by the indigenous villagers for whom the houses were built; and majority of the houses within “V” zone have been sold or rented out instead of being occupied by indigenous villagers; and	R2, R4(Part), R7, R8, R11, R12 and R14
(e) some land within the “V” zone is owned by development companies/developers which should	R2, R4(Part), R5(Part), R6, R7,

<p>not be used for Small House development. There would possibly be selling of “Small House rights” in the future.</p>	<p>R8, R11, R12 and R14</p>
<p>(3) The Board has made no reference to the evidence against excessive “V” zone as contained in the previous 10,000 submissions on the draft Hoi Ha OZP No. S/NE-HH/1.</p>	<p>R14</p>
<p>Responses</p>	
<p>(a) In response to (1), it is noted that the CFI did not query the need of indigenous villagers for Small House development which relates to one of the basis upon which the respective size of the “V” zone is planned. According to the JR Judgment, it is reasonable for the Board to start off by looking at the right of indigenous villagers to apply for building Small House and the forecast demand on the side of development need. The JR was allowed only on the basis that the Board has failed to properly inquire into the relevant issues, as set out in paragraph 2.4 above. To follow up the JR Judgment, a review of the issues has been undertaken for the Board’s consideration on 3.3.2020.</p> <p>(b) In the review of the genuine need issue, the Board noted that there is no practical means available for determining the genuine need for Small House development at the planning stage. In this regard, best available information relating to the Small House demand, including the updated/past figures on Small House grant applications and 10-year demand forecasts and its breakdown provided by IIRs starting from 2010, was obtained from LandsD for consideration by the Board. The Board was fully aware that there is no mechanism to verify the figures in the Small House demand forecast provided by the IIRs at the planning stage, the status of the Small House applicant would be verified by respective DLOs during the processing of Small House grant application, and the demand forecast was only one of the host of planning factors to be considered in designation of “V” zone. In designating the “V” zone on the Hoi Ha OZP, the Board has also taken into account all related planning considerations including but not limited to the village ‘environs’ (‘VE’), local topography, existing settlement pattern, outstanding Small House applications, Small House demand forecast, availability of road access and infrastructure, areas of ecological and landscape importance as well as site specific characteristics.</p> <p>(c) In response to (2), relevant factors have already been taken into account by the Board. In respect of the ground under 2(a) that the genuine need for housing should be based on the historical success rate of Small House grant application, it should be noted that the success rate of Small House grant applications depends on various factors, including specific technical constraints for the Small House development at individual sites and personal circumstances of individual applicants. It may not be a good reference to directly relate the successful rate to the genuine need for Small House development.</p>	

- (d) In respect of the ground under 2(b) that there is insufficient infrastructure in Hoi Ha to support further development, as set out in the TPB Paper No. 10626 considered by the Board on 3.3.2020, Hoi Ha area is accessible by Hoi Ha Road and is supplied with electricity, telephone services and potable water supply. It is considered that the infrastructural provision could support some further Small House development in the Area.
- (e) The issues raised in 2(c) to 2(e) concern mainly the administration of the Small House Policy (SHP), which shall be handled by LandsD in the course of processing Small House grant applications. These issues are not directly related to the subject of amendments to the OZP. Regarding 2(c), LandsD advises that the requirement for overseas villagers to prove an intention of living in Hong Kong only applies to those villagers applying for Small House grants on government land. This requirement does not apply to those overseas villagers applying for Small House on private land. For 2(d), DLO/TP advises that there were 5 Small Houses built at Hoi Ha Village in the past 20 years and 2 of which are still owned by the original grantees. In respect of 2(e), LandsD advises that application for Small House on private land would be rejected if the applicant is not the registered sole owner of the lot under application. If there is misrepresentation by an applicant or potential abuse of SHP, LandsD will initiate investigation and refer to the relevant enforcement departments if necessary. Furthermore, landownership should not be a material planning consideration on the designation of land use zones as ownership could change over time.
- (f) In response to (3), most of the previous representations/comments/further representations in respect of the Draft Hoi Ha OZP No. S/NE-HH/1 raised concern on the “V” zone designation, which is the subject of review on the genuine need issue on the Hoi Ha OZP in the TPB Paper No. 10626 considered by the Board on 3.3.2020, in accordance with the Court’s Judgment. A summary of the previous representations/comments/further representations is at **Annex IV**.

5.3.3 Designation of “V” zone

Major Grounds	Representations
<u>Inappropriate/ Excessive “V” Zone</u>	
(1) There is a stream flowing through the western part of the “V” zone into the HHWMP. Any development close to the stream would pose adverse environmental impacts.	R3, R4(Part), R5(Part), R6 and R20
(2) The western part of the current “V” zone adjoining the “GB(1)” comprises secondary and modified woodland of ecological value.	R3, R4(Part), R5(Part), R9, R10 and R13

Proposals	
(3) Rezoning the western vegetated part of the current “V” zone to “GB(1)” to cover the stream and the woodland. (Plan H-3)	R3, R4(Part), R5(Part), R6, R9, R10, R13 and R20
(4) Adopting the conservation approach adopted in Tai Long Wan, which (a) restricts the “V” zone to only cover the existing settlements and approved Small House sites, (b) moves ‘New Territories Exempted House (NTEH)’ from Column 1 to Column 2 in “V” zone, (c) deletes ‘House other than NTEH’ from Column 2 of “V” zone, and (d) adds the requirement to seek planning permission for demolition, addition, alteration and/or modification of an existing building in the Remarks of the Notes for “V” zone.	R3, R5(Part), R9, R10, R13 and R14
(5) Confining the “V” zone to the existing village settlements and approved Small House sites.	R6
(6) Reducing the “V” zone to accommodate only six houses.	R2, R7, R8 and R14
Responses	
<p>(a) In response to (1), (2) and (3), according to AFCD, the vegetated part of the “V” zone is covered in open shrubs and woody vegetation with scattered trees and partly overgrown with climbers. The stream flowing through this area is seasonal with a gentle profile, slow-flowing with clear and odourless water. The riparian vegetation is mainly disturbed shrubs and grassland with native plant species and some common wetland herbs. As compared with the woodlands to the east, south and western end of Hoi Ha, which are mature and contiguous with those inside the Country Park area, the woodland within area zoned “V” is relatively young and disturbed to a certain extent due to its proximity to the existing village. As there is no record of any species of conservation importance in this area, AFCD has no adverse comment on the current “V” zoning for this area.</p> <p>(b) In response to (4) on the proposal to incorporate planning control as adopted in Tai Long Wan OZP, each CPE should be considered on the circumstances and characteristics on individual basis. The imposition of specific planning control on the Tai Long Wan OZP is mainly based on the consideration that the village settlements in Tai Long Wan are well-preserved and of high heritage value. To ensure that new NTEH/Small House development would be in harmony with the existing historical village houses and would not affect the integrity of the existing village setting in Tai Long Wan, planning permission is required for new NTEH developments, and for any demolition of or any addition, alteration and/or modification to or redevelopment of an existing building within the “V” zone. There is no historic village of heritage significance in Hoi Ha OZP and there is no exceptional circumstances that warrant adopting the same planning control on new</p>	

NTEH/Small House developments within the “V” zone.
(c) In response to (5) and (6), an incremental approach has been adopted for designating the “V” zone with an aim to confining Small House development at suitable locations and to minimize adverse impact on the natural environment. The boundaries of “V” zone have been drawn up having regard to a host of planning factors including but not limited to the ‘VE’, local topography, settlement pattern, outstanding Small House applications, Small House demand forecast, availability of road access and infrastructure, areas of ecological and landscape importance as well as site specific characteristics. For Hoi Ha, the current “V” zone is confined mainly to the existing village cluster and a piece of abandoned farmland now covered in lowland forest and mixed shrubland to the immediate west of the village cluster. There is no strong reason for a further reduction of the “V” zone.

Major Grounds	Representations
<u>Insufficient Land to Meet Small House Demand</u>	
(7) The reduced “V” zone could not meet the Small House need in Hoi Ha.	R16, R17, R18 and R19
(8) The actual land available for Small House development was even less as Government land will no longer be granted in accordance with the Court’s Judgement on the JR on SHP.	R18 and R19
(9) According to Article 40 of Basic Law, the legal rights of the indigenous villagers of the New Territories should be protected and there should be adequate land within “V” to satisfy the Small House demand of the future male indigenous villagers.	R16
Proposals	
(10) To delete/reduce the size of the “CPA” and “GB(1)” zones under Items A and B.	R17, R18 and R19
Responses	
(d) In response to (7) and (10), the “V” zone is drawn up to strike a balance between conservation and development. In drawing up the land use proposal, a conservation-oriented approach was adopted as a starting point. The areas within and outside the ‘VE’ were carefully analysed in terms of suitability for Small House development taking account of a host of planning factors including but not limited to the ‘VE’, local topography, settlement pattern, outstanding Small House applications, Small House demand forecast, availability of road access and infrastructure, areas of ecological and landscape importance as well as site specific characteristics. An incremental approach has been adopted by first confining the “V” zone to the existing village settlements and the adjoining suitable land and then expanding outwards upon due consideration of all relevant planning considerations so as to minimize adverse impact on the natural environment.	

In order to comply with the JR Judgment, the Board, in deciding to make amendments to the OZP, has considered additional/updated information on Small House demand as mentioned in paragraphs 2.6 and 2.7 above. As advised by the District Lands Officer (Tai Po) (DLO/TP), no further Small House application has been received, approved or rejected in Hoi Ha since the Board's decision to make amendments to the OZP on 3.3.2020, and the number of outstanding applications remains as 14 as at 2.11.2020. The situation of infrastructural provision in the Area has also been unchanged. As such, there is no strong ground for enlarging the "V" zone in the prevailing circumstances to meet the Small House demand as proposed by the representers.

- (e) Regarding the representers' contention that the "V" zone is not sufficient to meet the Small House demand forecast, it should be noted that the Small House demand forecast provided by the IIRs is subject to changes over time and there is no mechanism to verify the figures in the Small House demand forecast provided by the IIRs at the planning stage to establish the genuine need for Small House development. The forecast is just one out of different pieces of information provided to facilitate the Board's consideration. There is also no obligation for the Board to recommend a "V" zone large enough to cater for the full Small House demand at the outset.
- (f) In response to (8), the concerned Judgment is related to the Government's land administration policy on Small House while the Board's plan-making function is pursuant to the TPO. The Board prepares draft plans for the lay-out of Hong Kong by way of zoning and the object of the draft plans is to indicate the broad land-use zonings for an area so that the development and redevelopment within the area can be put under statutory planning control. The Board's function is to determine the types of building suitable for a certain area. The power to grant land for erection of building rests with the LandsD and that is the power of the Director of Lands being challenged in the judicial review proceedings and the related appeal.
- (g) In response to (9), there is no express assertion of the right to build Small House under Article 40 of the Basic Law. Insofar as Small House development was subject to statutory planning controls that may be imposed under the TPO, applying those controls to the area concerned by way of the draft OZP does not appear inconsistent with Article 40 of the Basic Law.

Major Grounds	Representations
<u>Violation of the Block Government Lease (BGL) and SHP</u>	
(11) The designation of "V" zone has violated the BGL and SHP. The Board shall not prepare any plan under the TPO for an area covered by BGL before the Government has resumed the concerned lots under Lands Resumption Ordinance (Cap 124). Also, according to the SHP, the resumed lots shall only be	R15

re-granted to a lessee for Small House development after the Government has completed the planning of roads and other public facilities and updated the boundary of the remaining portion of the lots.	
Responses	
(h) In response to (11), matters related to BGL and implementation details of SHP are not directly related to the OZP. LandsD will handle the matters in the processing of Small House grant applications.	

5.3.4 *Environmental Impacts on Existing Water System*

Major Grounds	Representations
(1) The proposed extent of “V” zone would lead to sewage impacts affecting water bodies. The use of septic tank and soakaway system (STS) is not suitable for Hoi Ha due to its proximity with Hoi Ha Wan (HHW), presence of streams and high water table. It would exceed the natural treatment capacity in the locality, thus potentially deteriorate and cause cumulative impact on the nearby hydrological system and the HHWMP. Assessment of the sewage impact should be done before designating the “V” zone.	R2, R4(Part), R5(Part), R7, R8, R11, R12, R14 and R20
(2) The Practice Note for Professional Persons (ProPECC PN) 5/93 (PN) is not effective for monitoring the adverse sewage impact from STS in Hoi Ha in the following regards: (a) The setback distance for STS from high water mark (HWM) as stipulated under the PN is insufficient to prevent polluting Hoi Ha Wan because the HWM does not accurately reflect the sea/land boundary. Furthermore, there is a beach for recreation use near HWM, which is prone to pollution by sewage (R11 and R12). The setback distance should be increased to 45m (R7 and R8). (b) The current administration of STS requiring proper percolation test is poorly enforced.	R4(Part) R7, R8, R11 and R12 R14
Proposal	
(3) To rezone the “GB(1)” as “CA” for an area of at least 15 m from the main stream bank, and 15m on either bank of other streamcourses.	R14
Responses	
(a) In response to (1) and (2), the concerns on sewage treatment arrangements and water quality impact of Small Houses were also raised by many previous representations and comments. The Board, in considering these previous	

representations and comments, noted that the LandsD, when processing Small House grant applications, will consult concerned government departments including the DSD, EPD, AFCD and PlanD to ensure that all relevant departments would have adequate opportunity to review and comment on the applications. The design and construction of on-site STS system for any development proposals/submissions need to comply with relevant standards and regulations, such as EPD's Practice Note for Professional Person (ProPECC PN) 5/93 "Drainage Plans subject to Comment by the Environmental Protection Department". The Board was of the view that there was sufficient control in the current administrative system to ensure that individual Small House development and STS system within the "V" zone would not entail unacceptable impacts on the surrounding environment.

- (b) EPD advises that provided that the STS system is built at suitable location in accordance with the prescribed standards and regulations, the attenuation effect should be able to offer adequate protection to the nearby environment. Under the current practice, Building Professionals (Authorized Persons/Registered Structural Engineers/Registered Professional Engineers) are responsible for (i) the supervision of the percolation test, (ii) certification of the percolation test performances (to ascertain soil condition suitable for STS), and (iii) certification of the design of the STS systems, including the buffer distance requirements (generally not less than a 30m minimum clearance from High Water Mark (HWM) and 15m from a stream (or 30m if the stream is used for drinking or domestic purposes)), to ensure that the requirements stipulated in the ProPECC PN5/93 would be met at the application stage of Small House development processed by LandsD.
- (c) With the above mechanisms, there should not be any insurmountable impact from the use of STS in Small House development on the water quality of Hoi Ha Wan (HHW) and the streamcourses in the area. According to the AFCD's regular monitoring of the water quality of HHWMP, the quality of the main water-body of the MP is all along very good. This shows that the discharges from the existing Small Houses to the main water-body has not resulted in significant impact, compared to the carrying capacity of the main water-body of the MP.
- (d) As noted in the JR Judgment, the CFI is of the view that the Board is not necessary to inquire into and resolve those matters related to adverse environmental impacts caused by the septic tank system for the purpose of making the planning decision as far as it accepts the Small House application scheme could sufficiently address the issue.
- (e) In response to (3), given the above mechanisms in the control of adverse environmental impact from STS discharge, and the streams in Hoi Ha are not Ecologically Important Streams (EIS) (different circumstances from So Lo Pun with an EIS), the proposal to rezone the area on either bank of the streams to "CA" in Hoi Ha is considered not necessary. Furthermore, AFCD advises that there is no record of any species of conservation importance in

the concerned streams. Given the land area adjoining the HHWMP and the large stream to the west of the planning scheme have already been placed under conservation zonings, additional buffer would not be necessary.

5.3.5 *Preservation of CPE*

Major Grounds	Representations
(1) Hoi Ha is recognized with significant ecological interest relating to HHWMP and SSSI, Sai Kung West Country Park and natural streams. A total of 104 bird species are recorded in Hoi Ha and such diversity is related to the naturalness and diversity of different habitat types. The “V” zone should be further reduced to safeguard the ecological value of the diverse habitats and bird community against any development and human disturbances.	R4(Part), R5(Part) and R6
(2) The Board should take a stringent restrictive approach towards permitted land uses and development in CPEs to protect the existing environment.	R6
(3) All developments should be stopped as it would adversely affect the ecology of the area.	R15
(4) The Board has failed to fulfill the obligations under the Convention on Biodiversity (CBD) Article 8e to “promote environmentally sound and sustainable development in area adjacent to protected areas with a view to further protection of these areas”.	R7, R8 and R14
(5) The Board has failed to fulfil various requirements under Hong Kong’s Biodiversity Strategy and Action Plan (BSAP) 2016-21, including Action 2 on the conservation of ecologically important habitats outside the existing protected areas, Action 3 on the enhancement of natural streams conservation and Action 9 on incorporating biodiversity considerations in planning and development process.	
Proposals	
(6) Including Hoi Ha into Sai Kung West Country Park after detailed assessment and public consultation.	R5(part)
(7) The land use zonings for Hoi Ha should be for “Conservation Area” (“CA”) or a buffer for “CA” and Marine Park, and “GB(1)” with restrictions against houses	R14
Responses	
(a) In response to (1) and (7), the ecological value of Hoi Ha and the surrounding areas are well recognised and it has been an important	

consideration in drawing up the draft OZP. Conservation zones, such as “GB(1)”, “CA” and “CPA” under which there is a general presumption against development, have been designated to cover areas of ecological and landscape significance to protect the natural environment of Hoi Ha and the areas ecologically linked with Sai Kung West Country Park and HHWMP under the statutory planning framework. Regarding the protection of bird species, AFCD emphasises more on the preservation of habitats with high conservation value rather than individual species or specimens of conservation interest, and important habitats such as native woodlands, riparian zones as well as wetland areas, which could provide suitable habitats supporting a variety of species, were already covered by conservation zonings, such as “CA”, “CPA” and “GB(1)” in Hoi Ha for due protection.

- (b) In response to (2) and (3), a conservation-oriented approach has been adopted by the Board in preparing the OZP, in which all important habitats are protected by conservation zonings as a start. “V” zone is designated mainly to reflect the existing village clusters. To allow flexibility in land-use planning and control on development to meet the changing needs, provision for applications for planning permission is allowed for some uses in certain zones. These applications will be considered by the Board on individual merits to ensure no adverse impacts will be caused. As noted in the JR Judgment, the CFI also takes the view that the Board did seek to plan by striking a balance between conservation and development needs. The allegation that the Board failed to take into account the CPE policy was rejected by the CFI.
- (c) In response to (4) and (5), AFCD advises that the protection of the CPEs to meet conservation needs, either through designation of country parks or conservation zonings on statutory town plans, including the ‘conservation oriented approach’ adopted by the Board in amending the Hoi Ha OZP, is generally in line with the objectives of Article 8e of the CBD and the BSAP in promoting biodiversity conservation and sustainable development.
- (d) In response to (6), for CPEs protected by statutory plans, the general planning intention is to conserve the natural landscape and conservation value, protect the natural and rural character and allow for Small House development by the indigenous villagers of the existing recognised villages within the areas. Designation of country park is under the jurisdiction of the Country and Marine Parks Authority governed by the Country Parks Ordinance (Cap. 208) which is outside the purview of the Board.

5.3.6 *Maps Issue*

Major Grounds	Representations
The information on the base map adopted to designate	

<p>the zoning is inadequate and misleading.</p> <p>(1) High water mark (HWM) might not be an appropriate indication of the relationship between the sea and land. An alternative measurement, Highest Astronomical Tide (HAT) predicted and published by Hong Kong Observatory might be a better indication for the level where the sea reaches inland. (R7 and 8)</p> <p>(2) The beaches in front of the village are not plotted.</p> <p>(3) The marking of the streams on the map are important ‘evidence on the ground’ for enforcement against any diversion of streams/filling of pond, which should be clearly shown on the base map.</p> <p>(4) The boundary of SSSI as shown in the TPB Paper regarding the review of the OZP does not correspond with the boundary shown in the Government’s SSSI Register.</p>	<p>R7, R8, R11 and R12</p> <p>R2, R7, R8 and R14</p> <p>R7, R8 and R14</p> <p>R2, R7, R8 and R14</p>
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Responses

The Map Base of OZP

(a) The map base for the current Hoi Ha OZP was extracted from the 1:1000 basic maps prepared by the Survey and Mapping Office (SMO) of LandsD as at 31.1.2020 which was the most up-to-date version at that time. As advised by SMO, the basic maps are prepared for general reference only, and will be updated from time to time to reflect changes. In making the maps, due to cartographic limitation, selection and generalisation of features are needed. Generally speaking, while SMO would endeavour to capture ground features in the basic maps for general reference, there are situations where a feature could not be readily identified and located due to heavy vegetation and topography limitation on site, or the feature does not fully meet the mapping specifications adopted by SMO for mapping purpose. As a standard practice, PlanD would update the relevant plans and drawing based on the latest available survey map base whenever opportunity arises. The maps for the current hearing paper are based on the most up-to-date version dated 22.10.2020.

Indication of sea/land boundary

(b) In response to (1) above, the adoption of HWM, taken to be 2.3m above the Hong Kong Principal Datum, in the basic maps as a line for showing generally the boundary of the land and the sea is in accordance with SMO’s mapping specifications. There is no alternative annotation under the mapping specifications to serve the same mapping purpose.

- (c) For the HAT, HKO advises that it generally reflects the highest water level that can occur under average meteorological conditions and any combination of astronomical conditions. HKO computes HAT at various tide stations in Hong Kong every year using the predicted tide data from the current and past 18 years. As there is no tide station in Hoi Ha Wan, HAT is not available for that location (the nearest station is at Ko Lau Wan, which is about 3 km to the east of Hoi Ha). Same as HWM, HAT is only a general indication, which predicts the highest tide that may reach on an average basis. The actual highest tide level will depend on various factors including the weather effects such as storm surges. In view of the above, it is considered not feasible nor necessary to replace HWM with HAT as an alternative indication of the land/sea boundary in Hoi Ha.

Plotting the beach on the basic maps

- (d) In response to (2) above, SMO advises that the concerned coastal area in front of the village is predominantly overgrown with vegetation. According to the mapping specifications and as shown in the latest aerial photo, it is defined as 'vegetated area' instead of 'beach'. No specific annotation is designated under the mapping specifications to show a vegetated area.

Marking of streams on the basic maps

- (e) In response to (3) above, SMO advises that all streams with obvious and continuous water flow are shown on the 1:1000 basic maps. Regarding the importance of marking the streams on the base maps as evidence for enforcement against any diversion of streams/filling of pond, it should be noted that for the preparation of OZPs, the survey maps serve no more than a map base and a locational reference. There are many other materials taken into account, including land use survey records, lot boundaries records, geological maps, aerial photos, and site inspections by officers of the PlanD and other relevant departments. Planning control is not exercised based on the map base of the OZP. It is the physical features/activities on the ground that matter, i.e. diversion of streams and filling of ponds are under control, irrespective of whether the streams and ponds are shown on the map base or not.

The SSSI

- (f) In response to (4) above, the Hoi Ha SSSI falls outside the planning scheme area of the OZP. The northern boundary of the OZP coincides with the HHWMP boundary, which was established in the gazette map approved by the CE in C under the Marine Parks Ordinance (Cap 476) in June 1996, to provide certainty and to avoid duplication of controlling authorities.
- (g) The HHW SSSI was listed in January 1989 to reflect the scientific importance of the coral communities in Hoi Ha Wan. The boundary of the SSSI as shown in the plan deposited in the SSSI Register, which is a small

scale (1:20,000) plan prepared in 1992, is indicative only. It should be noted that the listing of SSSIs is primarily an administrative device to alert government departments about the biological/geological importance of these sites, and that due consideration should be given to conservation when developments at or close to these sites are proposed. AFCD will be consulted for proposed developments at or in the proximity to SSSIs. For instance, the Water Pollution Control Ordinance (WPCO) has stipulated a setback distance requirement between effluent discharges into coastal water and the SSSI. In this regard, EPD in exercising the control would consult AFCD to ensure the requirement is complied with.

- (h) Since June 1996, Hoi Ha Wan has been designated as a Marine Park. There are statutory provisions under Cap 476 and subsidiary regulations to prohibit and control activities such as discharging into the marine park and those which may potentially affect the ecological habitats in Hoi Ha Wan.

5.4 Comments on Representations

5.4.1 The 60 valid comments are submitted by Conservancy Association (**C54**), Hong Kong Bird Watching Society (**C55**), 港九工團聯合總會(**C56**) and individuals (**C1 to C53 and C57 to C60**). Of them, three commenters (**C54, C55 and C59**) are also representers themselves (**R4, R5 and R1**). 53 of them are submitted in the form of standard proforma with individual commenters providing additional comments on top. The list of commenters is at **Annex VI**.

5.4.2 The major grounds of comments and PlanD's responses, in consultation with the relevant government departments, are at **Annex V**. The major additional views are summarised as follows:

Additional Grounds/Views	Comments
(1) The reduction of "V" zone would not affect village development as claimed by R16 to R19 .	C1 to C53
(2) Brownfield sites should be used. Housing supply should not be an excuse for land development.	C47
(3) The "V" zone should be deleted from the OZP as its area is excessive and village development would have adverse impacts on "GB" and "CA" zones.	C56
Responses	
(a) In response to (1), response (d) under paragraph 5.3.3 above is relevant. (b) In response to (2), statutory plans for CPEs are not prepared for housing supply, but rather to conserve its natural landscape and conservation value, to protect its natural and rural character, and to allow for Small House development by the indigenous villagers. Over the years, the Government has adopted a multi-pronged approach for increasing land supply. To meet the acute housing need of the community, various measures in short, medium	

and long terms will be considered and explored concurrently.

- (c) In response to (3), since Hoi Ha is an indigenous village, consideration is given to designating “V” zone on the OZP to reflect the existing village clusters and identify suitable land for village expansion, if necessary. For the possible adverse impacts from the village development, there is sufficient control in the current administrative system to ensure that individual Small House development would not entail unacceptable impacts on the surrounding environment. The LandsD, when processing Small House grant applications, would consult concerned departments including AFCD, EPD and PlanD to ensure that all relevant departments would have adequate opportunity to review and comment on the applications.

6. Departmental Circulation

The following Government departments have been consulted and their responses have been incorporated in the above paragraphs, where appropriate:

- (a) District Lands Officer/Tai Po, Lands Department;
- (b) Director of Agriculture, Fisheries and Conservation;
- (c) Director of Environmental Protection;
- (d) Commissioner for Transport;
- (e) Chief Engineer/Mainland North, Drainage Services Department (DSD);
- (f) Chief Engineer/Sewerage Project, DSD;
- (g) Chief Engineer/Drainage Project, DSD;
- (h) Chief Engineer/Construction, Water Supplies Department;
- (i) Director of Fire Services;
- (j) Project Manager (North), North Development Office, Civil Engineering and Development Department (CEDD);
- (k) Head of Geotechnical Engineering Office, CEDD;
- (l) Chief Highway Engineer/New Territories East, Highways Department;
- (m) Chief Building Surveyor/New Territories West, Buildings Department;
- (n) Director of Electrical and Mechanical Services;
- (o) Director of Marine;
- (p) Director of Leisure and Cultural Services;
- (q) Director of Food and Environmental Hygiene;
- (r) Director of Housing;
- (s) Director of Hong Kong Observatory;
- (t) Director-General of Communications;
- (u) Executive Secretary (Antiquities and Monuments), Antiquities and Monuments Office, Development Bureau;
- (v) Government Property Administrator, Government Property Agency;
- (w) Secretary for Education;
- (x) Commissioner for Tourism;
- (y) Chief Town Planner/Urban Design and Landscape, PlanD and;
- (z) District Officer (Tai Po), Home Affairs Department.

7. Planning Department's Views

- 7.1 The supportive views of **R1, R4 (part) and R5 (part)** are noted.
- 7.2 Based on the assessments in paragraph 5 above, and for the following reasons, PlanD does not support the **R2, R3, R4 (part), R5 (part), R6 to R20** and considers that the draft OZP should not be amended to meet the representations:

Genuine Need for Small House Development

- (a) to follow up the Court's Judgment on the JR, a review on the genuine need for Small House development has been undertaken and the best available information has been provided to the Board for consideration (**R2, R3, R4(Part), R5(Part), R6 to R14**);

Designation of "V" zone

- (b) the designation of "V" zone is considered appropriate and a host of planning factors, including but not limited to the village 'environs', local topography, existing settlement pattern, numbers of approved and outstanding Small House applications, Small House demand forecast, availability of road access and infrastructure, areas of ecological and landscape importance as well as site specific characteristics have been taken into account. An incremental approach has been adopted for designating the "V" zone with an aim to confining Small House development to the existing village cluster and the adjoining suitable land and to minimize adverse impact on the natural environment. (**R2, R3, R4(Part), R5(Part), R6 to R14 and R16 to R20**);
- (c) each CPE should be considered on the circumstances and characteristics of individual areas, and same planning control of the Tai Long Wan OZP is considered not necessary to apply to Hoi Ha OZP (**R3, R5(Part), R9, R10, R13 and R14**);
- (d) matters related to BGL and implementation details of SHP are not directly related to the OZP. LandsD will handle these matters in processing of Small House grant application (**R15**);
- (e) there is no deprivation of landowners' right in using their land. The draft OZP is not inconsistent with Article 40 of the Basic Law (**R16**);
- (f) the Judgment on the Small House Policy is related to the Government's land administration power rather than the Board's plan-making function under the Town Planning Ordinance (Cap.131) (**R18 and R19**);
- (g) there is no record of any species of conservation importance in the western part of the "V" zone, which warrants a rezoning of this area to "GB(1)" (**R3, R4(Part), R5(Part), R6, R9, R10, R13, R14 and R20**);

Environmental Impacts on Existing Water System

- (h) there is an established mechanism exercised through the Small House grant application system administered by LandsD to ensure that individual Small House development and STS system within “V” zone would not entail unacceptable impacts on the surrounding environment (**R4(Part), R5(Part), R7, R8, R11, R12, R14 and R20**);

Preservation of CPE

- (i) the conservation zones, including “GB(1)”, “CA” and “CPA” have been designated at suitable locations to protect the natural environment of Hoi Ha and the areas ecologically linked with Sai Kung West Country Park and Hoi Ha Wan Marine Park under the statutory planning framework (**R3, R4(Part), R5(Part) and R6**);
- (j) a conservation-orientated approach has been adopted in drawing up the land use proposal of Hoi Ha, which aims to strike a balance between conservation and development (**R4(Part), R5(Part), R6 and R15**);
- (k) designation of the Country Park is under the jurisdiction of the Country and Marine Parks Authority governed by the Country Parks Ordinance (Cap. 208) which is outside the purview of the Board (**R5**); and

Maps Issue

- (l) It should be noted that the northern boundary of the OZP coincides with the HHWMP boundary to provide certainty and to avoid duplication of controlling authorities. Furthermore, planning control is not exercised based on the map base of the OZP. Survey maps serve no more than a map base and a general reference for the preparation of the OZPs. There are many other materials taken into account, including land use survey records, lot boundaries records, geological maps, aerial photos, and site inspections by officers in the PlanD and other relevant departments. A map base is to facilitate locational references and is not used for enforcement purposes (**R2, R7, R8, R11, R12 and R14**).

8. Decision Sought

- 8.1 The Board is invited to give consideration to the representations and comments taking into account the points raised in the hearing session, and decide whether to propose/not to propose any amendment to the OZP to meet/partially meet the representations.
- 8.2 Should the Board decide that no amendment should be made to the draft OZP to meet the representations, Members are also invited to agree that the draft OZP, together with their respective Notes and updated Explanatory Statement, are suitable for submission under section 8 of the Ordinance to the CE in C for

approval.

9. Attachments

Annex I	Draft Hoi Ha OZP No. S/NE-HH/3 (reduced size)
Annex II	Schedule of Amendments to the Draft Hoi Ha OZP No. S/NE-HH/3
Annex III(a)	TPB Paper No. 10626 with Plans 1 to 6 only
Annex III(b)	Extract of Minutes of the TPB Meeting held on 3.3.2020
Annex IV	Summary of Previous Representations, Comments and Further Representations in respect of Draft Hoi Ha OZP No. S/NE-HH/1
Annex V	Extract of Minutes of PHW of TPDC Meeting held on 11.5.2020
Annex VI	List of Representers and Commenters in respect of the Draft Hoi Ha OZP No. S/NE-HH/3
Annex VII	Summary of Representations and Comments and PlanD's Response in respect of the Draft Hoi Ha OZP No. S/NE-HH/3
Plan H-1	Location Plan of Representations and Comments
Plan H-2	Aerial Photo
Plan H-3	Proposals of Representations
Plans H-4a & 4b	Site Photos

**PLANNING DEPARTMENT
NOVEMBER 2020**