APPLICATION FOR PERMISSION UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/K22/25

Applicant : Social Welfare Department, Government of the Hong Kong Special

Administrative Region

<u>Site</u>: Kai Tak Area 4A Site 2, Kai Tak Development, Kowloon (to be known

as New Kowloon Inland Lot No. 6554)

Floor Area : Not more than 11,400m²

<u>Land Status</u>: Government Land

<u>Plan</u>: Approved Kai Tak Outline Zoning Plan (OZP) No. S/K22/6

Zoning : "Residential (Group B)5" ("R(B)5")

[subject to the following restrictions/requirement:

(a) maximum plot ratio (PR) of 6.1;

(b) maximum site coverage (SC) of 40% (excluding basement(s));

(c) maximum building height (BH) of 110mPD; and

(d) non-building area (NBA).]

Application : Proposed Social Welfare Facilities

1. The Proposal

- 1.1 The applicant, Social Welfare Department (SWD), seeks planning permission for proposed social welfare facilities at Kai Tak Area 4A Site 2, Kowloon (the Site) (**Plan A-1**). The Site, with an area of about 18,353m², falls within an area zoned "R(B)5" on the approved Kai Tak OZP No. S/K22/6. According to the Notes of the OZP for the "R(B)" zone, 'Social Welfare Facility' is a Column 2 use which requires planning permission from the Town Planning Board (the Board).
- 1.2 The application is for the provision of social welfare facilities with a total gross floor area (GFA) of not more than 11,400m² (i.e. equivalent to a total net operational floor area (NOFA) of not less than 5,162m²) in the Site.
- 1.3 According to SWD, the social welfare facilities would include:
 - (a) one 200-place Residential Care Home for the Elderly (RCHE) cum 30-place Day Care Unit for the Elderly (DCU);
 - (b) one 60-place Day Care Centre for the Elderly (DE);

- (c) one Neighbourhood Elderly Centre (NEC);
- (d) one Integrated Home Care Services Team (IHCST);
- (e) four Small Group Homes (SGHs)¹ providing 30 places;
- (f) one 120-place Integrated Vocational Rehabilitation Services Centre (IVRSC)²; and
- (g) one 50-place Hostel for Moderately Mentally Handicapped Persons (HMMH).

The GFA of the proposed welfare facilities will be counted towards the permitted maximum PR of 6.1 for the Site. Most of the welfare facilities, including the RCHE cum DCU, DE, NEC, IVRSC and HMMH, are required to be located not more than 24m above ground level.

- 1.4 A total of six parking spaces for private light buses (including two for the RCHE cum DCU, three for the DE and one for the IHCST), one parking space for light goods vehicle (for the IVRSC) and a loading/unloading (L/UL) space for the shared use of all welfare facilities are to be provided to serve the facilities.
- 1.5 The Site has been included in the 2019-20 Land Sale Programme for private residential development with retail use. Upon obtaining planning permission, relevant special conditions will be included in the land sale document requiring the purchaser of the Site to design and construct bare shell premises for the proposed welfare facilities as part of the development.
- 1.6 In order to provide design flexibility for the future purchaser of the sale site, the detailed design and layout of the proposed welfare facilities are not specified in this application. Detailed design of the proposed welfare facilities, including the floor area requirements, disposition of component facilities, accessibility, transport, environmental and fire safety aspects, would be controlled through relevant ordinances and regulations including the statutory requirements governing the licensing of RCHEs³ and Residential Care Homes for Persons with Disabilities (RCHDs)⁴, the building plan submission and the land sale conditions.

IVRSC is to provide persons with disabilities including mentally handicapped persons who are aged 15 or above with one-stop integrated and seamless vocational rehabilitation services specially designed to accommodate the limitations arising from their disabilities, in which they can be provided with work training, develop their social and economic potential, achieve upward mobility in vocational rehabilitation, and be prepared for potential advancement to open employment.

SGHs are non-institutional residential child care services provided for children from 4 to under 18 of age who cannot be adequately cared for by their families.

The Residential Care Homes (Elderly Persons) Ordinance (Cap. 459) and the Residential Care Homes (Elderly Persons) Regulation (Cap. 459A) regulate the operation of RCHEs in Hong Kong through a licensing scheme. The legislation aims at ensuring that residents in these homes receive services of acceptable standards that are of benefit to them physically, emotionally and socially.

⁴ The Residential Care Homes (Persons with Disabilities) Ordinance (Cap. 613) regulates the RCHDs by a licensing system to ensure that residents of RCHDs receive services of acceptable standards physically, emotionally and socially.

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- 1.7 The proposed welfare facilities will be designed and constructed by the future purchaser of the Site in accordance with the requirements set out in a technical schedule annexed to the land sale conditions to the satisfaction of the Director of Social Welfare and the Director of Architectural Services. The facilities will be handed back to the Government upon completion. The Labour and Welfare Bureau (LWB) has given policy support for the proposal and the cost of design and construction for the facilities will be met by the Lotteries Fund.
- 1.8 In support of the application, the applicant has submitted the following documents:

(a) Application Form received on 4.7.2019
 (b) Supplementary Planning Statement
 (c) Further Information received on 12.8.2019
 (Appendix Ib)

2. <u>Justifications from the Applicant</u>

The justifications put forth by the applicant in support of the application are set out in the supplementary planning statement and further information at **Appendices Ia and Ib**. They are summarised as follows:

Demand for the Proposed Welfare Facilities

- (a) There has been a persistent demand for RCHEs in view of the ageing population. The provision of RCHEs by the private and public sectors is inadequate to cope with the keen demand. The residential care services for the elderly are planned on a five-cluster basis and the proposed 200-place RCHE at the Site falls within the West Kowloon cluster having a total of 4,853 subsidised places. As at June 2019, there were 41,980 waitlistees on the Central Waiting List for various types of subsidised residential care services places for the elderly, with the average waiting time for care-and-attention places and nursing places at 23 and 26 months respectively. A trend of the ageing population in Hong Kong, with the projected median age of the population from 44.3 in 2016 to 50.9 in 2036, implies that it is essential to have a steady supply of RCHEs and day care places. As at end-April 2019, there were a total of 27,444 subsidised residential care services places and 3,240 subsidised day care places in the territory.
- (b) The demand for centre-based and home-based community care services for frail elderly persons provided by DEs and IHCSTs respectively has also been rapidly increasing and remains very acute. As at June 2019, there were 4,709 and 8,471 waiting cases for DEs/Day Care Units and IHCSTs respectively with an average waiting time of 13 and 19 months respectively.
- (c) Taking into account the anticipated population intake arising from the new residential developments at Kai Tak Area 4, it is envisaged that the existing provision of elderly service at neighbourhood level provided by NECs will not be sufficient to cater for the demand arising from the increase in population in the area.

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- (d) The demand for SGHs has remained high in the past years, the planning of which is based on the expressed service demand as reflected from the number of waitlisting cases for the service. The monthly average number of children on the waitlisting for SGH service in the past three financial years from 2016-17 to 2018-19 is around 200 to 250 with an average waiting time of about four months. As at end-April 2019, there were 258 children waitlisting for SGH service.
- (e) There is also a great and increasing demand for vocational rehabilitation services and home living provided by IVRSC and HMMH respectively. There has been a significant increase in the number of new applications for rehabilitation services for persons with disabilities including mentally handicapped persons over the past few years. As at end-April 2019, there were 15,722 applicants waitlisting for day, vocational training and residential care places. Among them, there were 2,549 and 2,482 applicants waitlisting for IVRSC and HMMH respectively, with an average waiting time of 21.3 and 114.1 months correspondingly.

Land Use Compatibility

(f) The Site is located within the cluster of medium-density residential developments. The environment is considered suitable for the proposed welfare facilities which are targeted for the elderly persons requiring suitable residential or day care services and toddlers/young children as well as persons with disabilities respectively. The facilities are not incompatible with the private residential development to be erected on the Site. There are many examples of incorporating welfare facilities in private residential The TPB also approved a similar planning application (No. developments. A/K22/22) in November 2018 for incorporation of a RCHE and a Child Care Centre (CCC) in the adjacent Site 4A1 which is located to the immediate northeast of the Site. The provision of the proposed welfare facilities in the private residential development on the Site will comply with relevant sections of the Hong Kong Planning Standards and Guidelines, other relevant regulations and statutory/licensing requirements including but not limited to the Residential Care Homes (Elderly Persons) Ordinance (Cap. 459), Residential Care Homes (Elderly Persons) Regulation (Cap. 459A), Code of Practice for Residential Care Homes (Elderly Persons), Residential Care Homes (Persons with Disabilities) Ordinance (Cap. 613) and Code of Practice for Residential Care Homes (Persons with Disabilities), as appropriate.

<u>Insignificant Impacts</u>

(g) The proposed welfare facilities will form part of the private residential development with retail use to be erected on the Site. Their GFA will be counted towards the permitted maximum plot ratio of 6.1 for the Site under the OZP and will not result in any increase in the total permissible GFA. Moreover, the provision of residential places (200 in the proposed RCHE cum DCU, 50 in the proposed HMMH and 30 in the proposed SGHs) will not induce major increase in population for the whole development.

- (h) Unlike the proposed RCHE, SGHs and HMMH, the remaining welfare facilities are not residential services and are set up to help relieve the pressure for more welfare facilities in the community. With the provision of day, home care and a range of comprehensive services to support needy elderly persons as well as their carers, while enabling these elderly persons to age in place, the services of DE, IHCST and NEC will also alleviate the care stress burden of their carers. Similarly, the provision of day rehabilitation training services to service users living nearby can help relieve the carers in daytime and thus reduce their stress.
- (i) Having regard to the scale and operation mode of the proposed welfare facilities particularly the minimal impact of such facilities on the population size for the whole development, significant traffic, environmental, drainage and sewerage impacts on the surrounding areas are not envisaged.
- (j) The technical advisor of SWD has examined the site constraints (including gross floor area for provision of 1 to 2-storey retail block) and advises that it would be possible to accommodate all proposed welfare facilities (alongside retail gross floor area) in the Site based on information available and preliminary assessment, subject to detailed design by the purchaser of the Site.

3. Compliance with the "Owner's Consent/Notification" Requirement

As the Site involves government land only, the "owner's consent/notification" 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) is not applicable to the application.

4. Previous Application

The Site, among 20 other sites in Kai Tak Development (KTD), was involved in a previous planning application (No. A/K22/16) submitted by Civil Engineering and Development Department (CEDD) for proposed minor relaxation of PR/BH restrictions, which was approved with conditions by the Metro Planning Committee (the Committee) on 17.4.2015 when the previous approved Kai Tak OZP No. S/K22/4 was in force and the Site was zoned "Commercial (4)". With the planning permission granted by the Committee, the maximum PR and BH of the Site were relaxed from 4.0 to 5.0 and from 45mPD to 55mPD respectively⁵.

5. Similar Application

There is one similar application (No. A/K22/22) for proposed 'Social Welfare Facility'

The Site was subsequently rezoned to "R(B)5" with its boundary adjusted and subject to new development restrictions of maximum PR of 6.1, maximum SC of 40% and maximum BH of 110mPD on the draft Kai Tak OZP No. S/K22/5 exhibited on 17.2.2017 for reflecting the recommended development proposals under the Review Study of KTD. The amendments incorporated in the draft OZP No. S/K22/5, including the amended zoning and development restrictions for the Site, were approved by the Chief Executive in Council on 15.5.2018.

comprising a 200-place RCHE and a 100-place CCC at the sale site of Kai Tak Site 4A1, which is located to the northeast of the Site and is also zoned "R(B)5" on the Kai Tak OZP (**Plan A-1**). The application was approved by the Committee on 2.11.2018 mainly for the reasons that the proposed welfare facilities were not incompatible with the surrounding residential developments and the private residential development to be developed on the site as they would serve the need of the neighbourhood, the proposed welfare facilities would not induce major increase in the population for the whole development and relevant departments had no objection to the application.

6. The Site and Its Surrounding Areas (Plans A-1 and A-2, and photos on Plans A-3 and A-4)

6.1 The Site is:

- (a) located at the Runway Area (i.e Area 4) of KTD and is situated at the junction of Road D3 (i.e. the realigned Shing Fung Road that connects with Kai Tak City Centre) and Road D4 (i.e. Kai Tak Bridge that connects with the South Apron area); and
- (b) currently connected to Kowloon Bay/Kwun Tong via Shing Fung Road, Kai Tak Bridge and Shing Cheong Road.
- 6.2 The surrounding areas have the following characteristics:
 - (a) mostly planned residential sites which are zoned "R(B)4", "R(B)5" and "R(B)7" and intended for medium-density residential developments;
 - (b) to its immediate northeast is the Central Boulevard of the Runway Area with an elevated landscaped deck above the at-grade Road D3;
 - (c) to its immediate southwest is a waterfront promenade zoned "Open Space" facing the Victoria Harbour;
 - (d) to its immediate northwest and southeast are two 10m-wide pedestrian streets shown as 'Road' areas; and
 - (e) the Hong Kong Children's Hospital and the planned New Acute Hospital are located on the opposite side of the Kai Tak Approach Channel.

7. Planning Intention

7.1 The planning intention of "R(B)5" zone is primarily for medium-density residential development. Retail belt/frontage along the side of the site abutting the open space, waterfront promenade or pedestrian streets is provided enhance of the space/waterfront vibrancy adjoining open promenade/pedestrian streets. Residential developments in the Runway Area should comprise podium-free residential towers and low blocks to achieve diversity in building mass/form for a more interesting building height profile in the area.

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7.2 According to the Explanatory Statement of the OZP, for sites fronting the waterfront promenade along the western side of the Runway, to enhance the vibrancy of the adjoining areas, retail frontage abutting the open space, waterfront promenade or pedestrian street are proposed. According to the Notes of the OZP, 'Shop and Services' and 'Eating Place' uses are always permitted on the lowest two floors of buildings in all residential zones in the Runway (i.e. "R(B)4", "R(B)5", "R(B)6" and "R(B)7" zones).

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

8.1 The following government departments have been consulted and their views on the application are summarised as follows:

Land Administration

- 8.1.1 Comments of the Chief Estate Surveyor/Land Supply, Lands Department (CES/LS, LandsD):
 - (a) He has no objection to the application from the land sale point of view.
 - (b) The incorporation of the requirements for provision of the social welfare facilities into the land sale conditions has been approved in principle by the District Lands Conference subject to, inter alias, planning permission from the Board be obtained.

Traffic

- 8.1.2 Comments of the Commissioner for Transport (C for T):
 - (a) He has no objection to the application.
 - (b) The applicant should note that there will be no public car parking spaces or roadside laybys near the Site.

Environment

- 8.1.3 Comments of the Director of Environmental Protection (DEP):
 - (a) He has no objection to the application from the environmental planning perspective.
 - (b) He notes that air quality impact assessment (AQIA), noise impact assessment (NIA) and sewerage impact assessment (SIA) clauses will be imposed in the land sale conditions for the Site. The future purchaser of the Site has to carry out AQIA, NIA and SIA to ascertain the environmental acceptability of the proposed development (including both residential and welfare facilities) within the Site.

Building Matters

- 8.1.4 Comments of the Chief Building Surveyor/Kowloon, Buildings Department (CBS/K, BD):
 - (a) All building works are subject to compliance with the Buildings Ordinance (BO).
 - (b) RCHE and SGHs both for habitation are domestic use under the BO while other proposed facilities are regarded as non-domestic use.
 - (c) Detailed fundamental checking on the building proposal of the development could only be made in the building plan submission stage.

Harbourfront Planning

8.1.5 Comments of the Harbour Office, Development Bureau (DEVB):

The Site falls within the harbourfront area under the purview of Harbourfront Commission's Task Force on Kai Tak Harbourfront Development (KTTF). SWD (i.e. the applicant) circulated a consultation paper to KTTF on the subject proposal. No comment on the proposed welfare facilities was made by the Members of KTTF.

Fire Safety

- 8.1.6 Comments of the Director of Fire Services (D of FS):
 - (a) He has no in-principle objection to the application subject to fire service installations and water supplies for firefighting being provided to the satisfaction of his Department.
 - (b) Detailed fire safety requirements will be formulated upon receipt of formal submission of general building plans. The arrangement of emergency vehicular access shall comply with Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011 which is administered by BD. The statutory height restriction in the Residential Care Homes (Elderly Persons) Regulation (Cap. 459A) and the Residential Care Homes (Persons with Disabilities) Regulation (Cap. 613A) shall be observed.

District Officer's Comments

8.1.7 Comments of the District Officer (Kowloon City), Home Affairs Department (DO(KC), HAD):

He has no comment on the application and notes that the Planning Department has notified the interested Kowloon City District Council (DC) members as well as the Owners' Committee/Mutual Aid Committees/Management Committees of buildings near the Site about the planning application. The Board should take into account all the comments gathered in the consultation exercise in the decision making process. Should the application be eventually approved, the applicant should take appropriate measures to address the concerns of relevant stakeholders.

- 8.2 The following government bureau/departments have no objection to or no adverse comment on the application:
 - (a) Head of Energizing Kowloon East Office, DEVB;
 - (b) Chief Highway Engineer/Kowloon, Highways Department;
 - (c) Chief Town Planner/Urban Design and Landscape, Planning Department;
 - (d) Chief Architect/CMD2, Architectural Services Department;
 - (e) Project Manager (East) (PM(E)), CEDD;
 - (f) Chief Engineer/Construction, Water Supplies Department;
 - (g) Chief Engineer/Mainland South, Drainage Services Department;
 - (h) Director of Electrical and Mechanical Services;
 - (i) Director of Leisure and Cultural Services;
 - (j) Director of Food and Environmental Hygiene;
 - (k) Commissioner of Police; and
 - (l) District Officer (Kwun Tong), HAD.

9. Public Comments Received During Statutory Publication Period

On 12.7.2019, the application was published for public inspection. During the first three weeks of the statutory public inspection period, which ended on 2.8.2019, 15 public comments submitted by individuals (**Appendix II**) were received with 14 objecting to the application and one providing views on the application. The main reasons of objection are that the proposed welfare facilities are not compatible with the planning theme of the Kai Tak Runway Precinct as a world class tourism node; the proposed facilities incorporated in the Site will greatly reduce the value of the Site thereby affecting the Government's land sale revenue and affect the property value of the surrounding developments; and the large scale of proposed facilities will worsen the traffic condition of the area and generate nuisance to the nearby residents. The one providing views on the application comments that there is insufficient information about the application.

10. Planning Considerations and Assessments

The Site and the Proposal

10.1 The applicant, SWD, seeks planning permission for proposed social welfare facilities at the Site zoned "R(B)5" on the OZP which is intended primarily for medium-density residential development with retail use abutting the waterfront promenade and pedestrian streets. The GFA of the proposed

welfare facilities will be not more than 11,400m², which is equivalent to about 10.2% of the total maximum GFA of about 111,950m² (i.e. PR of 6.1) of the Site. The applicant proposes to provide seven types of welfare facilities, including a RCHE cum DCU, a DE, a NEC, a IHCST, four SCHs, a IVRSC and a HMMH, at the Site. The future purchaser of the Site will be required to design and construct bare shell premises of the proposed welfare facilities as part of the development on the Site.

- While the proposed welfare facilities are not entirely in line with the planning intention of the "R(B)5" zone to provide residential flats with some retail use, they would help meet the demand from the population of KTD and the territory for residential and day care services for the elderly as well as the toddlers/young children and persons with disabilities in need.
- 10.3 It is stated in the planning intention for the "R(B)" zone that retail belt/frontage along the side of the site abutting the open space, waterfront promenade or pedestrian streets is provided to enhance vibrancy of the adjoining open space/waterfront promenade/pedestrian streets. For the Site, retail belt should be provided along the waterfront promenade and pedestrian streets at its northwest, southwest and southeast boundaries. In this regard, the applicant indicated that it would be possible to accommodate all proposed welfare facilities (alongside retail gross floor area) in the Site based on information available and preliminary assessment, subject to detailed design by the purchaser of the Site.

In Line with Government Policy

- The initiative of augmenting the provision of welfare facilities in different types of developments has been clearly stated in the 2017 Policy Agenda. In addition to the need for implementation of new measures to enhance the provision and planning of elderly services as recommended in the Elderly Services Programme Plan, it was set out in the 2017 Policy Agenda that the Government would explore measures that would encourage private developers to provide various welfare facilities in their development projects. As promulgated in the 2018 Policy Agenda, the Government is committed to the continual increase in the number of residential care places in phases so as to enhance support and protection for children and families in need. It is also the Government's policy to pro-actively identify suitable sites for providing more residential and day rehabilitation places for persons with disabilities. The application is in line with the Government's overall policy of increasing the provision of welfare facilities, which is in the public interest.
- Similarly, social welfare facilities were incorporated in two other private residential developments in KTD. The Government stipulated the requirements for the provision of two RCHEs and two DEs in the land sale conditions of Site 1F1 located in the north apron area, which is zoned "Other Specified Uses" annotated "Mixed Use (2)" and sold in May 2018. Besides, the land sale conditions of Site 4A1 to the northeast of the Site had also been stipulated with requirements for the provision of one RCHE and one CCC (which is subject of the approved Application No. A/K22/22), and the site was sold in July 2019.

Land Use Compatibility

The Site is located in an urban area predominately occupied by newly developed and planned medium-density residential developments. The proposed welfare facilities are considered not incompatible with the surrounding residential developments and the private residential development with retail use to be developed on the Site as they are facilities for serving the needs of the neighbourhood and the district at large.

Harbourfront Planning

10.7 The Members of KTTF were consulted and they had no comment on the proposed welfare facilities at the Site.

Technical Aspect

The proposed welfare facilities will not result in any increase in the total permissible GFA for the Site. As the proposed RCHE cum DCU, SGHs and HMMH altogether only provide a total of 280 residential care places, they will not induce major increase in population for the whole development. Noting that the requirements for carrying of AQIA, NIA and SIA for the proposed development, including the proposed welfare facilities, will be incorporated into the land sale conditions of the Site, DEP has no objection to the application. Other relevant departments consulted, including C for T and PM(E) of CEDD, also have no objection to the application.

Implementation Aspect

10.9 As advised by CES/LS of LandsD, the incorporation of the requirements for provision of the proposed social welfare facilities into the land sale conditions has been approved in principle by District Lands Conference subject to, inter alias, planning permission from the Board be obtained. According to SWD, the cost of design and construction of the proposed welfare facilities will be The developer of the Site will be responsible for met by the Lotteries Fund. the design and construction of bare shell premises of the proposed welfare facilities as part of the private development on the Site and hand back the facilities to the Government upon completion in accordance with the land sale conditions. Detailed design of the proposed welfare facilities, including its interface with retail belt/frontage and the requirement for providing retail belt/frontage along the waterfront promenade and pedestrian streets at the northwest, southwest and southeast boundaries of the Site, would be controlled through relevant ordinances and regulations including the statutory requirements governing the licensing of RCHEs and RCHDs, the building plan submission and the land sale conditions together with the technical schedule annexed thereto.

Public Comments

10.10 Regarding the public comments, the planning considerations and assessments as set out above are generally relevant. The proposed welfare facilities for

serving the needs of the neighbourhood and the district at large are not considered incompatible with the surrounding residential developments. C for T has no adverse comment on traffic impact and other departments do not consider that proposing social welfare facilities at the Site will generate nuisance to nearby residents.

11. Planning Department's Views

- Based on the assessments made in paragraph 10 and having taking into account the public comments mentioned in paragraph 9, the Planning Department <u>has no objection</u> to the application.
- Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 16.8.2023, 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.
- 11.3 There is no strong planning reason to recommend rejection of the application.

12. <u>Decision Sought</u>

- 12.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 12.2 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 date when the validity of the permission should expire.
- 12.3 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.

13. Attachments

Appendix I
Appendix Ia
Appendix Ia
Supplementary Planning Statement

Expendix Ib
Supplementary Planning Statement

Appendix Ib Further Information received on 12.8.2019

Appendix II Public Comments

Plan A-1 Location Plan Plan A-2 Site Plan A-1 Plan A-3 Aerial Photo Plan A-4 Site Photos

PLANNING DEPARTMENT AUGUST 2019