

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/SLC/148

<u>Applicant</u>	Ms. AU YEUNG Kam Ping
<u>Site</u>	Lot 2366 in D.D. 316 Lantau, Pui O, Lantau Island
<u>Site Area</u>	About 411m ²
<u>Lease</u>	Block Government Lease for Agricultural use
<u>Plan</u>	Approved South Lantau Coast Outline Zoning Plan No. S/SLC/21 (currently in force) Draft South Lantau Coast Outline Zoning Plan No. S/SLC/20 (at the time of submission of application)
<u>Zoning</u>	“Coastal Protection Area” (“CPA”)
<u>Application</u>	Proposed Filling of Land (1.2m) for Permitted Agricultural Use

1. The Proposal

- 1.1 The applicant seeks planning permission to carry out filling of land by 1.2m high for agricultural use at the application site (the Site). The Site falls within an area zoned “CPA” on the approved South Lantau Coast Outline Zoning Plan (OZP) No. S/SLC/21 (**Plan A-1**). According to the Notes of the OZP, ‘Agricultural Use’ is always permitted within “CPA” zone, while any filling of land within “CPA” zone, including that to effect a change of use to any of those specified in Columns 1 and 2 or the uses or developments always permitted under the covering Notes, requires planning permission from the Town Planning Board (the Board).
- 1.2 In support of the application, the applicant has submitted the following documents:
 - (a) Application Form received on 27.11.2017 **(Appendix I)**
 - (b) Further information (FI) received on 22.12.2017 clarifying **(Appendix Ia)**
the types of filling material and no structure will be erected;
(exempted from publication) and

- (c) FI received on 16.1.2018 providing further justifications (**Appendix Ib**) for the application (exempted from publication).

2. Justifications from the Applicant

The justifications put forth by the applicant in support of application are detailed in **Appendices I, Ia and Ib** and they are summarised as follows:

- (a) the Site is located at lowland and susceptible to flooding during rainy season. The proposed land filling of 1.2m is to prevent soil loss so that farming can be carried out at the Site. The filling material is soil (i.e. 黃花沙 and 山泥) covered by cow manure and composting soil (牛糞及堆肥);
- (b) the Site was a paddy field fifty years ago and has now become abandoned farmland of low ecological value. The applicant intends to carry out farming at the Site to produce organic products for local villagers so as to minimise their need for travelling to Tung Chung and increase the food self-sufficiency ratio. This is in line with the spirit of “Sustainable Agriculture” (永續農業) promoted under Agricultural Land Rehabilitation Scheme by the Agricultural, Fisheries and Conservation Department. The application is supported by local villagers;
- (c) the proposed “Sustainable Agriculture” by organic farming will not destroy the coastal environment nor the habitats for buffaloes. It will rehabilitate the original village character, protect the natural environment as well as enhance biodiversity; and
- (d) the applicant has operated other organic farms and fish farms and attended various training courses for organic farming (**Appendix 1b**). She has no intention to turn the Site into a brownfield site.

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

The applicant is the sole “current land owner”. Detailed information would be deposited at the meeting for Members’ inspection.

4. Previous Application

There is no previous application at the Site.

5. Similar Application

- 5.1 There is one similar application for filling of land within the same “CPA” zone in the vicinity of the Site. Application No. A/SLC/131 for proposed filling of land (by 1m high) for permitted agricultural use was rejected by the Rural and New Town Planning Committee (RNTPC) of the Board on 19.4.2013 mainly on the grounds that the applicant failed to provide sufficient information to show the material for land filling, justify the need for 1m land filling, and demonstrate no adverse impact on the surrounding areas; and setting of an undesirable precedent for similar applications

within the “CPA” zone.

5.2 Details of the above similar application is summarised at **Appendix III** and the location is shown on **Plan A-1**.

6. The Site and Its Surrounding Areas (Plans A-1 to A-2 and photos on Plans A-3 to A-7)

6.1 The Site has the following characteristics:

- (a) part of the Site abutting the road has been formed and paved and occupied by two containers while the remaining part of the Site is recently cleared and brick wall has been erected around the Site (**Plans A-6 to A-7**);
- (b) located to the immediate west of a local road leading to South Lantau Road via Chi Ma Wan Road;
- (c) falls within the Pui O Site of Archaeological Interest; and
- (d) before the application was submitted, the Site was largely covered by grass with the portion abutting the local road formed and covered by structure/ container (site photo taken on 8.2.2017 on **Plan A-4**). Since the application was submitted, the western part of the Site was gradually filled by soil and gravel (site photos taken on 5.12.2017 on **Plan A-4**, 21.12.2017 on **Plan A-5** and 4.1.2018 on **Plan A-4a**). Recently, brick wall has been constructed around the Site and some construction materials and machinery could be found at the Site (site photos taken on 11.1.2018 on **Plans A-4a to A-7**).

6.2 The surrounding areas have the following characteristics (**Plan A-2**):

- (a) predominantly rural in character with abandoned farmland and marshes to the immediate surrounding where buffaloes could be found;
- (b) a tent camping ground without planning permission is located to the immediate east across the local road.
- (c) a natural stream and Pui O Beach are situated about 10m and 50m to the south of the Site respectively; and
- (d) rural developments including the South Lantau Rural Committee Office and recreational facilities such as South Lantau Community Centre, Pui O Playground and Pui O Children’s Playground are located about 100m to the further north of the Site.

7. Planning Intention

The “CPA” zone is intended to conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development. It is also intended to safeguard the beaches and their immediate hinterland and

to prevent haphazard ribbon development along the South Lantau Coast. 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.

8. Comments from Relevant Government Departments

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

Lantau Development

8.1.1 Comments of the Head of Sustainable Lantau Office, Civil Engineering and Development Department (Head(SLO) of CEDD):

- (a) the Sustainable Lantau Blueprint ('Blueprint') promulgated in June 2017 embraces the overarching principle of "Development in the North; Conservation for the South". The predominant part of Lantau, in particular the South Lantau, would be conserved for its natural and cultural resources, with sustainable leisure and recreational uses;
- (b) the wetland in Pui O, which was previously a paddy field, is rich in biodiversity of wetland plants and macro-invertebrates and is reminiscent of the living of farmers a few decades ago. The Blueprint proposes to conserve the wetland in Pui O. Any proposal at or in the proximity of Pui O wetland must ensure that it should not result in adverse impact to the wetland habitat; and
- (c) from his site inspections conducted in December 2017 and January 2018, it was noted that the Site has been gradually filled up and fenced off with brick wall. Proceeding works before planning approval should not be encouraged. Moreover, as part of the wetland, such activities may cause negative impact on the wetland habitat.

Land Administration

8.1.2 Comments of the District Lands Officer/Islands, Lands Department (DLO/Is, LandsD):

- (a) he has no comment on the application as it does not involve erection of structure at the Site;
- (b) the Lot is held under Block Government Lease for Agricultural use. No structure shall be erected on the Lot without his prior approval;
- (c) it is noted that some structures are erected at the Site without his prior approval. On 17.10.2016, the Director of Lands has issued a warning letter to the applicant for an unauthorized structure (i.e. a single-storey structure with metal canopy) at the Site which

constitutes a breach of the condition in the Government lease under which the Lot is held (site photo taken on 8.2.2017 on **Plan A-4**). The existing 2 containers on Site (**Plans A-5 and A-6**) is a modification of the unauthorised structure referred to in the warning letter. As the warning letter has already been registered in the Land Registry, no further enforcement action will be taken by his office in the meantime. His office has no record on the removal of the unauthorized structure by the applicant. The Government reserves the right to take appropriate lease enforcement for any structure erected or to be erected without prior approval; and

- (d) the site inspection on 8.1.2018 revealed that a brick wall of about 1.2 in height has been erected at the Site. No construction works were being carried out during the site inspection. As the Site is an Old Scheduled Agricultural Lot held under Block Government Lease and erection of fence wall within the Lot does not constitute a breach of lease conditions, no enforcement action to the erection of brick wall would be taken by his office.

Environment

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

- (a) no objection to the application as he considers that the potential water quality impacts arising from the application can be alleviated through the implementation of relevant water pollution control measures. The applicant is reminded to implement appropriate water pollution control measures if the application is going to be approved;
- (b) according to S.5.3.2 of the Hong Kong Planning Standards and Guidelines (HKPSG), the applicant should note that no new discharge outlet should be located within 100m of the boundaries of any gazetted beach in any direction, including rivers and streams; and
- (c) the temporary container office and storage of construction materials would unlikely have major land contamination issue. Nonetheless, it is the applicant's responsibility to confirm with justification whether there is any land contamination at the Site.

Urban Design and Visual

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

considering the conditions of the Site and its surroundings which are predominantly vacant with some vegetation scattering to the south of the Site, the proposal would not significantly change the character of the Site and is considered not incompatible with the surrounding rural and natural environment.

Landscape

8.1.5 Comments of the CTP/UD&L, PlanD:

- (a) some reservations on the application from landscape planning perspective;
- (b) the Site was a largely vacant flat land with few existing containers and some existing trees along the site boundary. It is situated in the wider surrounding areas of mainly vacant lands, with dense vegetation/existing trees scattered along the coast at the southern side of the Site. The existing landscape character of the Site is a rural and natural area with an existing road/access connected to the Site. As shown in the site photos taken on 4.1.2018 (**Plan A-4a**), there have already been some soil stockpiling/dumping (apparently happened quite recently) within the Site;
- (c) tree/vegetation survey showing the existing trees (species, size, health condition and amenity value) within and in adjacent to the Site is not included in the application. Any large tree and plant species of conservation interests is not identified. Information of the extent of the proposed filling of land for 1.2m is not provided. The potential adverse impacts on the existing landscape resources trees/vegetation cannot be fully ascertained;
- (d) with regard to the proposed land filling (1.2m), it is anticipated to have significant and irreversible impacts/changes to the current physical landform/topography as well as the overall landscape quality of the Site and its surrounding area as:
 - (i) there is no information given regarding the method statement of the proposed filling (1.2m), including the extent, gradient, slope profile, edge treatment of the proposed filling (for example, whether a retaining structure will be required and its extent and profile with regard to the application boundary). The overall impacts caused to the change of landform/topography and overall landscape character cannot be reasonably ascertained;
 - (ii) in connection to above, the potential impact to the surrounding environment has not been reasonably assessed/stated in the application in view of the change(s) and impact to the surface runoff and local water table;
 - (iii) according to the site photo on 4.1.2018 (**Plan A-4a**), 'soil stockpiling/dumping' at some portions of the Site is considered to have been taken place recently (as heaps of newly dumped/turned over soil are observed from the photo). Impact to the existing landscape character has somehow taken effect recently;
- (e) justification for the proposed filling of land is not sound (i.e. for

prevention of loss of water and soil for agricultural use as stated in the application) as there is no direct relationship between the retention of water/soil and proposed built-up soil level;

- (f) the width of the existing access is not provided. No information is provided regarding other temporary access which may be formed/operated during the filling works that may be in conflict with existing vegetation/trees. The overall impacts to the existing trees/vegetation cannot be fully assessed;
- (g) approval of the application may cause a ripple effect for other applications for the area zoned as “CPA” adjacent to the Site, resulting in the overall irreversible landform/topography and gradual degradation of the natural landscape character of the Site (i.e. not in line with the planning intention for safeguarding the beaches and their immediate hinterland. This scenic and ecologically sensitive coastal areas with “CPA” zone should also be protected against land filling, land excavation); and
- (h) Should the Board approve this application, the following landscape related condition is recommended to be included in the permission:

Submission and implementation of a Landscape Proposal including a Tree Preservation Proposal to the satisfaction of the Director of Planning or of the Board.

Agriculture and Nature Conservation

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

- (a) he has reservation on the application;
- (b) the Site is situated on roadside, partly paved and occupied with an existing structure and soil deposits. It is noted that there is a recent submission to Environmental Protection Department (EPD) under the Waste Disposal Ordinance (WDO) at the Site;
- (c) it is not clear how the land intended for construction waste disposal will be used for agricultural purpose. Although the Site is commonly inundated, flood tolerated crops such as watercress and water spinach can be cultivated;
- (d) the undisturbed portion of the Site and its adjoining wet agricultural land are home to a number of wetland dependent wild fauna as well as the feral buffaloes. Land filling at the Site is undesirable in view of the impact to these fauna; and
- (e) the soil and compost mentioned in the applicant’s FI (**Appendix Ia**) are common components for agricultural use. However, there are construction & demolition (C&D) wastes deposited in the Site apart from the soil. Besides, it is noted that while the application is being

processed, works including construction of fence wall and land filling has continued at the Site. The situation is highly undesirable.

Drainage

8.1.7 Comments of the Chief Engineer/Hong Kong & Islands, Drainage Services Department (CE/HK&I, DSD):

- (a) he has no in-principle objection to the application given that:
 - (i) the filling works would not discharge any spoils/ slurries to the nearby drainage system;
 - (ii) the filling works would not block, disturb or interfere with the nearby drainage system;
- (b) there are no drainage or sewerage facilities by DSD in the vicinity of the Site; and
- (c) he has no record of flooding case at the Site. However, based on his preliminary observation on site, the flatland surrounding the Site is located downstream of the upper catchment with topography lower than the surrounding area and flooding may occur from heavy rainstorm. A natural stream would run through the flatland in heavy rainstorm collecting runoff from upland catchment (**Plan A-2**).

Building Matters

8.1.8 Comments of the Chief Building Surveyor/New Territories East 1 & Licence (CBS/NTE1&L), Buildings Department (BD):

- (a) there is currently no building plan submission for the Site;
- (b) if there are existing structures which had been erected on leased land without approval of the Buildings Department (BD) (not being a New Territories Exempted House), they are unauthorized under the Buildings Ordinance (BO) and should not be designated for any approved use under the application;
- (c) for unauthorized building works (UBW) erected on leased land, enforcement action may be taken by BD to effect their removal in accordance with BD's enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the Site under the BO;
- (d) before any new building works (including site formation works) are to be carried out at the Site, the prior approval and consent from the Building Authority should be obtained, otherwise they are UBW;
- (e) as denoted in section 7 of the application form, no private development

or building is entailed. In case there is / are proposed development (s) / building(s) associated with the application:

- (i) the permissible site coverage and plot ratio of the development(s) / building(s) should comply with Regulations 20 and 21 of the Building (Planning) Regulations (B(P)R);
- (ii) if the Site does not abut on a specified street, the intensity (i.e. site coverage, plot ratio and building height(s) of the development(s) / building(s) shall be determined by the Building Authority under B(P)R19(3) upon formal submission of building plans to BD;
- (iii) the Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with B(P)R5 and 41D respectively; and
- (iv) detailed comments under the BO on the private development(s) / building(s) such as permissible plot ratio, site coverage, emergency vehicular access, private streets and/or access roads, barrier free access and facilities, compliance with the sustainable building design guidelines, etc. will be formulated at the formal building plan submission stage.

8.1.9 Comments of the Chief Building Surveyor/Section A, Existing Building Division 1 (CBS/A), BD:

since the subject building works comply with the exemption criteria laid down under BO (Application to the New Territories) (Cap.121) in respect of agricultural use, this case is referred to DLO/Is of LandsD for follow up action. No enforcement action is contemplated by BD at this stage.

Slope Safety

8.1.10 Comments of the Chief Building Surveyor/Slope Safety, Existing Building Division 2 (CBS/SS), BD:

BD and Geotechnical Engineering Office (GEO) of CEDD has recently carried out site inspection at the Site and revealed that there was a brick wall, a stockpile of sands/other materials and excavated pit. Based on the observations during site inspection, GEO advised that there was no sign of distress on the brick wall and no building or facility in the vicinity of the Site. Also, no imminent and obvious danger involving a significant consequence to life was identified. In this connection, the issue of Dangerous Hillside Order section 27A of the BO is not warranted.

Others

8.1.11 Comments of the Director of Leisure and Cultural Services (DLCS):

the proposed filling of land shall not affect the daily operation as well as the

water quality of the gazetted beach nearby, i.e. the Pui O Beach.

8.2 The following government departments have no comment on the application:

- (a) Antiquities and Monuments Office, Leisure and Cultural Services Department (AMO, LCSD)
- (b) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (c) Chief Highway Engineer/NT East, Highways Department (CHE/NTE, HyD);
- (d) Commissioner for Transport (C for T);
- (e) Director of Fire Services (D of FS);
- (f) District Officer (Islands), Home Affairs Department (DO/Is, HAD); and
- (g) Head of Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD)

9. Public Comments Received During Statutory Publication Period

On 5.12.2017, the application was published for public inspection. During the first three-week statutory public inspection period which ended on 27.12.2017, 63 public comments (**Appendix III**) from Kadoorie Farm and Botanic Garden Corporation, World Wide Fund for Natural Hong Kong, Living Islands Movement, Hong Kong Bird Watching Society, Designing Hong Kong Limited, Alliance for a Beautiful Hong Kong, Save Lantau Alliance and 56 individuals were received, in which all of them raise objection/concerns to the application. The major grounds of objection/concerns include illegal dumping of construction waste; adverse impact on Pui O wetland and its ecological habitats (in particular buffaloes); adverse ecological, environmental (waste/dust/air/underground water pollution), landscape, visual and tourism impacts; not in line with planning intention of the “CPA” zone, the Sustainable Lantau Blueprint and the Chief Executive's Policy Address to conserve Pui O wetland; the Site is not intended/suitable for farming; a “Destroy First, Develop Later” case and setting of an undesirable precedent.

10. Planning Considerations and Assessments

- 10.1 The applicant seeks planning permission for filling of land by about 1.2m high at the Site for permitted agricultural use. The Site is a private lot held under Block Government Lease for agricultural purpose and located in an area zoned “CPA” on the OZP. The planning intention of the “CPA” zone is to conserve, protect and retain the natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development. There is a general presumption against development in this zone. According to the Notes of the OZP, ‘Agricultural Use’ is always permitted within the “CPA” zone while filling of land requires planning permission from the Board.
- 10.2 There is insufficient information in the submission to justify that the proposed land filling of 1.2m is necessary for the permitted agricultural use. The Site is subject of a recent submission to EPD for construction waste deposition under WDO. In this regard, the DAFC considers that it is unclear how the land intended for construction waste disposal will be used for agricultural purpose. While the soil and compost mentioned by the applicant are common components for agricultural use, the DAFC notes that there are construction and demolition (C&D) waste deposited in the Site

apart from the soil. The CTP/UD&L of PlanD also considers that the justification for the proposed filling of land is not sound (i.e. for prevention of loss of water and soil for agricultural use) as there is no direct relationship between the retention of water/soil and proposed built-up soil level.

- 10.3 The Site is located within Pui O wetland surrounded by abandoned farmland and marshes which is rich in biodiversity of wetland plants and macro-invertebrates. The Head(SLO) of CEDD advises that the Sustainable Lantau Blueprint (the Blueprint) proposes to conserve the wetland at Pui O. Any proposal at or in the proximity of Pui O wetland must ensure that it should not result in adverse impact to the wetland habitat. The Site has been gradually filled up and fenced off with brick wall. As part of the wetland, such activities may cause negative impact on the wetland habitat. DAFC also has reservation on the application as the undisturbed portion of the Site and its adjoining wet agricultural land are home to a number of wetland dependent wild fauna as well as the feral buffaloes. Land filling at the Site is undesirable in view of the impact to these fauna.
- 10.4 The existing landscape character of the Site is a rural and natural area with dense vegetation/existing trees scattered along the coast at the southern side of the Site. While the CTP/UD&L of PlanD advises that the proposed land filling is considered not incompatible with the surrounding rural and natural environment, he has reservation on the application from landscape planning perspective. As no tree/vegetation survey, extent and method of the proposed land filling and the width of access to the Site is provided in the submission, the adverse impact on the existing landscape resources/trees/vegetation cannot be ascertained. The proposed land filling is anticipated to have significant and irreversible impacts/changes to the current physical landform/topography as well as the overall landscape quality of the Site and its surrounding area. Approval of the application may cause a ripple effect for other applications within "CPA" adjacent to the Site, resulting in the overall irreversible landform/topography and gradual degradation of the natural landscape character of the Site.
- 10.5 The applicant proposes to fill up the Site for 1.2m for permitted agricultural use to prevent soil loss during rainy season and flooding. The CE/HK&I of DSD advises that he has no record of flooding case at the Site. However, the flatland surrounding the Site is located downstream of the upper catchment with topography lower than the surrounding area and flooding may occur from heavy rainstorm. The CTP/UD&L of PlanD considers that the potential impact to the surrounding environment in view of the change(s) and impact to the surface runoff and local water table has not been reasonably assessed. The DEP also advises that appropriate water pollution control measures should be implemented to alleviate the potential water quality impact arising from the application.
- 10.6 Furthermore, it is noted that the western part (originally undisturbed part) of the Site has been gradually filled and a brick wall surrounding the Site has been built during the processing of the application, which is considered highly undesirable by the DAFC. Granting of approval to the application would set an undesirable precedent for similar applications within the "CPA" zone and the cumulative effect of approving such applications would result in a general degradation of the natural environment of the area. There is one similar application No. A/SLC/131 for proposed filling of land for permitted agricultural use rejected by the RNTPC on 19.4.2013 mainly on the

grounds of insufficient information to show the material for land filling, and justify the need for 1m land filling, and demonstrate no adverse impact on the surrounding areas; and setting an undesirable precedent.

- 10.7 There are 63 public comments objecting/expressing concern to the application mainly on the grounds of illegal dumping of construction waste; adverse impact on Pui O wetland; adverse ecological, environmental, landscape, visual and tourism impact; not in line with planning intention of the “CPA” zone, the Blueprint and the Policy Address; a “Destroy First, Develop Later” case and setting of undesirable precedent. The planning assessments and comments of Government departments above are relevant.

11. Planning Department’s Views

- 11.1 Based on the assessment made in paragraph 10 and having taken into account the public comments in paragraph 9, the Planning Department does not support the application for the following reasons:

- (a) there is insufficient information in the submission to justify the need for 1.2m land filling for permitted agricultural use,
- (b) the applicant fails to demonstrate that the proposed filling of land will not have adverse ecological and landscape impacts on the surrounding areas; and
- (c) approval of the application would set an undesirable precedent for similar applications within the “CPA” zone and the cumulative effect of approving such applications would lead to a general degradation of the natural environment of the area.

- 11.2 Alternatively, should the Committee decide to approve the application, it is suggested that the permission shall be valid until **26.1.2022**, and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following condition of approval and advisory clauses are also suggested for Members’ reference:

Approval Condition

the submission and implementation of landscape proposal including a tree preservation proposal to the satisfaction of the Director of Planning or of the Town Planning Board

Advisory Clauses

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

12. Decision Sought

- 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 and advisory clauses, 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	Application form received on 27.11.2017
Appendix Ia	Further information received on 22.12.2017
Appendix Ib	Further information received on 16.1.2018
Appendix II	Similar Applications
Appendix III	Public Comments received during the Statutory Publication Period
Appendix IV	Advisory Clauses
Drawing A-1	Layout Plan
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4 to A-7	Site Photos

**PLANNING DEPARTMENT
JANUARY 2018**