

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/NE-HLH/43

<u>Applicant</u>	:	Chun Fai Construction Engineering Company Limited
<u>Site</u>	:	Lot 327 in D.D. 87, Ta Kwu Ling, New Territories
<u>Site Area</u>	:	About 1,845 m ²
<u>Lease</u>	:	Block Government Lease (demised for agricultural use)
<u>Plan</u>	:	Approved Hung Lung Hang Outline Zoning Plan (OZP) No. S/NE-HLH/11
<u>Zoning</u>	:	“Agriculture” (“AGR”)
<u>Application</u>	:	Temporary Open Storage of Construction Materials and Machinery with Ancillary Office for a Period of 3 Years

1. The Proposal

- 1.1 The applicant seeks planning permission to use the application site (the Site) for a temporary open storage of construction materials and machinery with ancillary office for a period of three years (**Plan A-1**). The Site falls within an area zoned “AGR” on the approved Hung Lung Hang OZP No. S/NE-HLH/11. According to the Notes of the OZP, temporary use or development of any land or building not exceeding a period of three years in “AGR” zone requires planning permission from the Town Planning Board (the Board) notwithstanding that the use is not provided for under the Notes of the OZP.
- 1.2 According to the applicant, the development involves ten temporary structures (2.4m height) with a total floor area of about 140 m² for office and storage uses. The development will also provide eight parking spaces and five loading/unloading spaces for private light, medium and heavy goods vehicles (**Drawing A-1**). The Site is accessible via a local track from Kong Nga Po Road (**Plan A-1**). The operation hours are from 8:00 a.m. to 6:00 p.m. from Mondays to Saturdays and there is no operation on Sundays and public holidays. The Site is currently used for the applied use without planning permission.
- 1.3 The Site is the subject of a previous application (No. A/NE-HLH/38) submitted by the same applicant for the same use. The application was rejected by the Rural and New Town Planning Committee (the Committee) of the Board on 3.1.2020 mainly on the grounds that the development was not in line with the planning intention of the “AGR” zone; the application did not comply with the Town Planning Board Guidelines for ‘Application for Open Storage and Port Back-up Uses under Section 16 of the Town Planning Ordinance’

(TPB PG-No. 13E); and the applicant failed to demonstrate that the development would not cause adverse traffic impact on the surrounding areas. When compared with the previously rejected application, the major development parameters including the layout and floor area of the current submission remain unchanged.

- 1.4 In support of the application, the applicant has submitted the Application Form with attachments which was received on 27.4.2020 (**Appendix I**).

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in Part 7 of the application form at **Appendix I**. They can be summarized as follows:

- (a) there are a number of large-scale infrastructure projects upcoming in Hong Kong. In view of limited supply of open storage area, there is an imminent need to search for more areas to support the construction industry. The company has contributed to different large scale infrastructure projects in Hong Kong in the past 30 years. Due to impact of coronavirus on construction industry, the company could further thrive and contribute to construction industry should the application be approved;
- (b) similar application was applied in Kam Tin for open storage use. Whilst there were no objections from relevant Government departments, the application was still rejected by the Board. Therefore, the company is looking for an alternative site where the potential environmental impact of the development on the neighbourhood can be minimized; and
- (c) the Site has been used for the applied use since 2018 mainly storing steel or timber for a short period of time. There is no complaint received relating to environment, drainage or traffic from the neighbourhood. The temporary use would not create any adverse environmental and drainage impacts on the surrounding areas.

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

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

4. Background

The Chief Town Planner / Central Enforcement and Prosecution, Planning Department (CTP/CEP, PlanD) advised that the Site is subject to planning enforcement action against an unauthorized development (UD) involving storage (including deposit of containers) and workshop uses. An Enforcement Notice (EN) was issued on 16.10.2019 to the notice recipient requiring the discontinuance of the unauthorized development by 16.1.2020. According to the latest site inspection, the UD had not been discontinued upon the expiry of the EN. The concerned party may be subject to prosecution action.

5. Town Planning Board Guidelines

Town Planning Board Guidelines No.13F for ‘Application for Open Storage and Port Back-up Uses’ (TPB PG-No. 13F) promulgated by the Board on 27.3.2020 are relevant to the application. The Site falls within Category 3 area under the Guidelines. Relevant extract of the Guidelines is attached at **Appendix II**.

6. Previous Application

6.1 The Site is the subject of a previous application (No. A/NE-HLH/38) for the same use submitted by the same applicant. The application was rejected by the Committee on 3.1.2020 mainly on the grounds that the development was not in line with the planning intention of the “AGR” zone; the application did not comply with the Town Planning Board Guidelines for ‘Application for Open Storage and Port Back-up Uses under Section 16 of the Town Planning Ordinance’ (TPB PG-No. 13E); and the applicant failed to demonstrate that the development would not cause adverse traffic impact on the surrounding areas. When compared with the previously rejected application, the major development parameters including the layout and floor area of the current submission remain unchanged.

6.2 Details of the previous application are summarized at **Appendix III** and its location is shown on **Plan A-1**.

7. Similar Applications

7.1 There are five similar applications (No. A/NE-HLH/17, 20, 21, 32 and 33) for temporary open storage uses within the “AGR” zone in the vicinity of the Site (**Plan A-1**). All applications were rejected by the Rural and New Town Planning Committee or the Board on review or dismissed by the Town Planning Appeal Board Panel (TPAB) between April 2011 and January 2019 mainly on the grounds of not in line with the planning intention of the “AGR” zone, not complying with the TPB PG-No. 13E in that no previous planning approval has been granted to the sites; adverse departmental comments received on the applications; no/insufficient information to demonstrate that the developments would not generate adverse environmental, traffic and landscape impacts on the surrounding areas and setting an undesirable precedent for other similar applications within the “AGR” zone.

7.2 Details of the applications are summarized at **Appendix IV** and their locations are shown on **Plan A-1**.

8. The Site and Its Surrounding Areas (Plans A-1 and A-2, aerial photos on Plans A-3a and A-3b and site photos on Plans A-4a and A-4b)

8.1 The Site is:

- (a) flat, paved and fenced off;
- (b) currently used for the applied use without planning permission; and
- (c) accessible from Kong Nga Po Road via a local track (**Plan A-1**).

8.2 The surrounding areas have the following characteristics:

- (a) rural character mixed with open storage yards, temporary structures for storage uses, tree clusters, fallow agricultural land, and vacant/unused land;
- (b) to its immediate north is vacant land and to its further north is an open storage yard;
- (c) to the immediate east and west are tree groups and stream; and
- (d) to the south and southwest are open storage yards which are subject to enforcement action against an unauthorized development involving storage use (**Plan A-2**).

9. **Planning Intention**

The planning intention of the “AGR” zone is intended primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes.

10. **Comments from Relevant Government Departments**

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

Land Administration

10.1.1 Comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD):

- (a) the lot under application is an Old Schedule Lot held under Block Government Lease (demised for agricultural use) without any guaranteed right of access. The applicant should make his own arrangement for acquiring access, and there is no guarantee that any adjoining Government land will be allowed for the applied use;
- (b) the existing structures on the Site were erected without approval from his office. The aforesaid structures are not acceptable under lease concerned. His office reserves the right to take enforcement actions against the aforesaid structures;
- (c) one of existing structures is for toilet use without approval from his office. The applicant should note that any proposed septic tank and soakage pit system should meet current health requirements;
- (d) the occupation and application boundary do not tally. The occupation boundary of the Site enriches onto Lots 325 and 328 in D.D. 87 (**Plan A-2**); and

- (e) if the application is approved, the owner of the lot concerned shall apply to his office for a Short Term Waiver (STW) covering all the actual occupation area. The application for STW will be considered by Government in its landlord's capacity and there is no guarantee that it will be approved. If the STW is approved, its commencement date would be backdated to the first date of occupation and it will be subject to such terms and conditions to be imposed including payment of waiver fee and administrative fee as considered appropriate by his office.

Traffic

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

- (a) he does not support the application from traffic engineering point of view. The applicant should provide the following information/ measures for his consideration:
 - (i) the applicant shall justify the adequacy of the parking spaces and loading/unloading spaces so provided by relating to the number of vehicles visiting the Site;
 - (ii) the applicant should advise the width of the vehicular access;
 - (iii) the vehicular access should be no less than 7.3m wide;
 - (iv) the applicant shall demonstrate the satisfactory manoeuvring of vehicles entering to and exiting from the Site and manoeuvring within the Site, preferably using the swept path analysis;
 - (v) the applicant shall advise the management/control measures to be implemented to ensure no queuing of vehicles outside the Site; and
 - (vi) the applicant shall advise the provision and management of pedestrian facilities to ensure pedestrian safety.
- (b) the vehicular access between the Site and Kong Nga Po Road is not managed by TD. The applicant should seek comment from the responsible party.

10.1.3 Comments of the Chief Engineer/New Territories East, Highways Department (CHE/NTE, HyD):

he has no comment on the application from highways viewpoint. The access road to the Site is not maintained by Highways Department.

Agriculture

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

- (a) the Site is currently a paved land used for open storage. Agricultural infrastructures such as road access and water source are available. The Site can be used for agricultural activities such as greenhouse, plant nurseries, etc. As the Site possesses potential for agricultural rehabilitation, the

application is not supported from agricultural point of view; and

- (b) the western edge of the Site would encroach onto the natural stream located to the west of the Site (**Plan A-2**). Due to its close proximity to the stream at the west, any adverse impact on the stream such as surface runoff with contaminants, should be avoided. Should the application be approved due to other consideration, the applicant should be reminded to implement good site practice so as not to pollute the stream nearby.

Environment

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

- (a) he does not support the application as there are domestic structures about 70m away to the west of the Site boundary (**Plan A-2**); and
- (b) should the application be approved, the applicant is advised to follow the relevant mitigation measures and requirements in the latest “Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites” issued by DEP. For the proposed septic tank and soakaway system, its design and construction should follow the requirements of the Practice Note for Professional Person (ProPECC) PN 5/93 “Drainage Plans subject to Comment by the Environmental Protection Department”.

Drainage

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

- (a) he has no in-principle objection to the application from the public drainage viewpoint;
- (b) should the application be approved, a condition should be included to request the applicant to submit and implement a drainage proposal for the Site to ensure that it will not cause adverse drainage impact to the adjacent areas; and
- (c) the Site is in an area where no public sewerage connection is available.

Landscape

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

- (a) she has reservation on the application from landscape planning perspective; and
- (b) the Site is located in an area of rural landscape character comprises cluster of trees and temporary structures. Based on the aerial photos 2017 and 2019 (**Plans A-3a and A-3b**), the Site was densely vegetated in 2017. All existing vegetation within and surrounding the Site was cleared, and the Site had

been extensively hard paved connected by access road in close proximity since 2018. Significant adverse landscape impact has taken place prior to planning approval.

Fire Safety

10.1.8 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 being provided to the satisfaction of his department;
- (b) in consideration of the design/nature of the proposal, Fire Service Installations (FSIs) are anticipated to be required. Therefore, the applicant is advised to submit relevant layout plans incorporated with the proposed FSIs to his department for approval. In addition, the applicant should also be advised on the following points:
 - (i) the layout plans should be drawn to scale and depicted with dimensions and nature of occupancy;
 - (ii) the location of where the proposed FSI to be installed should be clearly marked on the layout plans; and
 - (iii) good practice guidelines for open storage should be adhered to.
- (c) having considered the nature of the open storage, an approval condition requiring the provision of fire extinguisher(s) within 6 weeks from the date of planning approval should be incorporated if the application is approved. To address this approval condition, the applicant is required to submit a valid fire certificate (FS 251) to his department for approval; and
- (d) the applicant is reminded that if the proposed structure(s) is required to comply with the Buildings Ordinance (Cap.123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.

Building Matters

10.1.9 Comments of the Chief Building Surveyor/ New Territories West, Buildings Department (CBS/NTW, BD):

- (a) before any new building works (including containers as temporary buildings) are to be carried out on the Site, the prior approval and consent of the Building Authority (BA) should be obtained, otherwise they are unauthorized building works (UBW). An Authorized Person (AP) should be appointed as the coordinator for the proposed building works in accordance with the Buildings Ordinance (BO);
- (b) for UBW erected on leased land, enforcement action may be taken by the BA 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;

- (c) any temporary shelters or converted containers for storage or washroom or workshop or other uses are considered as temporary buildings are subject to the control of Part VII of the Building (Planning) Regulations (B(P)R);
- (d) the Site shall be provided with means of obtaining access thereto from a street under the B(P)R 5 and emergency vehicular access shall be provided under B(P)R 41D;
- (e) if the Site is not abutting on a specified street having a width not less than 4.5m wide, the development intensity shall be determined by the BA under B(P)R 19(3) at the building plan submission stage; and
- (f) formal submission under the BO is required for any proposed new works, including any temporary structures. Detailed comments under BO will be provided at the building plan submission stage.

District Officer's Comments

10.1.10 Comments of the District Officer (North), Home Affairs Department (DO(N), HAD):

- (a) he has consulted the locals regarding the application. The Vice-Chairman of Ta Kwu Ling District Rural Committee, Indigenous Inhabitant Representative (IIR) of Chow Tin Tsuen and the Chairman of 打鼓嶺沙嶺村居民福利會 object to the application mainly on the grounds of adverse traffic and drainage impact, and degradation of rural environment;
- (b) the incumbent North District Council (NDC) Member of subject constituency, the other IIR and Resident Representative (RR) of Chow Tin Tsuen, IIR of Lei Uk and IIR of Tai Po Tin and the Chairman of, the IIR of Chow Tin Tsuen, the IIR and RR of San Uk Ling, the RR of Sheung Shan Kai Wat and the RR of Tai Po Tin have no comment on the application; and
- (c) the IIR of Sheung Shan Kai Wat and the IIR of Tai Po Tin did not respond to the consultation.

10.2 The following Government departments have no comment on/no objection to the application:

- (a) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and
- (b) Project Manager (North), North Development Office, Civil Engineering and Development Department (PM(N), CEDD).

11. Public Comments Received During Statutory Publication Period

On 5.5.2020, the application was published for public inspection. During the statutory public inspection period, five public comments were received (**Appendix V**). A NDC Member indicates no comment on the application. The remaining four comments from Kadoorie Farm and Botanic Garden Corporation, the Hong Kong Bird Watching Society, Designing Hong Kong Limited and an individual object to the application mainly for the reasons that the application is not in line with the planning intention of the “AGR” zone; approval of the application will further legitimize unauthorized development; approval of the application would set an undesirable precedent for similar applications within the “AGR” zone and enforcement action against the unauthorized use has been carried out, “destroy first, apply later” approach should be deterred.

12. Planning Considerations and Assessments

12.1 The application is for a temporary open storage of construction materials and machinery with ancillary office for a period of three years at the Site which falls entirely within the “AGR” zone on the OZP (**Plan A-1**). The temporary open storage under the application is not in line with the planning intention of the “AGR” zone which is primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes and to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes. DAFC does not support the application from the agricultural point of view as the Site possesses potential for agricultural rehabilitation and can be used as greenhouse or plant nurseries. No strong planning justification has been given in the submission to justify for a departure from the planning intention, even on a temporary basis.

12.2 The Site falls within Category 3 area under the TPB PG-No. 13F promulgated by the Board on 27.3.2020. The following considerations in the Guidelines are relevant:

Category 3 areas: applications would normally not be favourably considered unless the applications are on sites with previous planning approvals. Sympathetic consideration may be given if the applicants have demonstrated genuine efforts in compliance with approval conditions of the previous planning applications and included in the fresh applications relevant technical assessments/proposals, if required, to demonstrate that the proposed uses would not generate adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas. Subject to no adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions, planning permission could be granted on a temporary basis up to a maximum period of 3 years.

12.3 The Site is hard-paved and situated in an area of rural character mixed with tree groups and temporary structures. The applied use is considered not entirely compatible with the landscape character of the area. CTP/UD&L, PlanD has reservation on the application from landscape planning perspective. It is noted that all existing vegetation within and surrounding the Site was cleared and the Site has been hard paved extensively since 2018 (**Plans A-3a and A-3b**). Approval of the application would set an undesirable precedent of landscape character alteration by vegetation clearance and site formation, and would encourage more similar development within the area. The cumulative impact of such approval would further degrade the landscape quality of the surrounding environment.

- 12.4 C for T does not support the application from the traffic engineering viewpoint as the applicant has not provided information on the estimated traffic flow, justifications for the proposed parking and loading/unloading spaces, relevant satisfactory management/ control measures, traffic arrangement and vehicle manouvering within the Site and provision and management of pedestrian facilities. As such, the applicant fails to demonstrate that the development would not generate adverse traffic impact on the surrounding area. There are domestic structures located to the southwest of the Site at a distance of about 70m (**Plan A-2**). In this regard, DEP does not support the application. Other relevant Government departments consulted, including CE/MN, DSD and D of FS, have no adverse comment on or no objection to the application.
- 12.5 According to the TPB PG-No.13F, the Site falls within Category 3 areas (**Appendix II**) where applications would normally not be favourably considered unless the applications are on sites with previous planning approvals. The application does not comply with the TPB PG-No.13F in that the Site is not the subject of any previous planning approval; there are adverse departmental and public comments on the application; and the applicant has failed to demonstrate that the development would have no adverse traffic impact on the surrounding areas.
- 12.6 The Site is the subject of a previous planning application (No. A/NE-HLH/38) for the same use submitted by the same applicant. That application was rejected by the Committee in January 2020 mainly on the grounds of not in line with the planning intention of the “AGR” zone; not complying with the TPB PG-No.13E; and adverse traffic impact on the surrounding areas. There has been no major change in planning circumstances of the area since the rejection of the previous application.
- 12.7 There are five similar applications (Nos. A/NE-HLH/17, 20, 21, 32 and 33) for open storage use within the same “AGR” zone which were all rejected by Committee or by the Board on review or dismissed by the TPAB between April 2011 and January 2019 mainly on the grounds of not in line with the planning intention of the “AGR” zone; not complying with the TPB PG-No.13E in that no previous planning approval had been granted to the application sites; adverse departmental comments received on the applications; no/insufficient information to demonstrate that the developments would not generate adverse environmental, traffic and/or landscape impacts on the surrounding areas; and setting an undesirable precedent for other similar applications. The circumstances of the current application are similar to those rejected applications.
- 12.8 Regarding the local objections conveyed by DO(N) of HAD and the adverse public comments against the application as detailed in paragraphs 10.1.10 and 11 above respectively, the Government departments’ comments and the planning assessments above are relevant.

13. Planning Department’s Views

- 13.1 Based on the assessments made in paragraph 12 and having taken into account the local objections conveyed by DO(N) of HAD and the public comments mentioned in paragraphs 10.1.10 and 11 above, the Planning Department does not support the application for the following reasons:

- (a) the development is not in line with the planning intention of the “AGR” zone which is primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes and to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes. There is no strong justification in the submission for a departure from such planning intention, even on a temporary basis;
- (b) the development does not comply with the Town Planning Board Guidelines (TPB PG-No. 13F) for ‘Application for Open Storage and Port Back-up Uses under Section 16 of the Town Planning Ordinance’ in that there is no previous approval for open storage granted for the Site; and there are adverse comments from the relevant Government departments and local objections on the application; and
- (c) the applicant fails to demonstrate that the development would not cause adverse traffic impact on the surrounding areas.

13.2 Alternatively, should the Committee decide to approve the application, it is suggested that the permission shall be valid on a temporary basis for a period of 3 years until 26.6.2023. The following conditions of approval and advisory clauses are also suggested for Members’ reference:

Approval Conditions

- (a) no operation between 6:00 p.m. and 8:00 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;
- (b) no operation on Sundays and public holidays, as proposed by the applicant, is allowed on the Site during the planning approval period;
- (c) the provision of peripheral fencing on the Site within 6 months from the date of planning approval to the satisfaction of the Director of Planning or of the Town Planning Board by 26.12.2020;
- (d) the submission of a drainage proposal within 6 months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by 26.12.2020;
- (e) in relation to (d) above, the implementation of drainage proposal within 9 months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by 26.3.2021;
- (f) the provision of fire extinguisher(s) within 6 weeks from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 7.8.2020;
- (g) the submission of proposals for fire service installations and water supplies for fire-fighting within 6 months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 26.12.2020;

- (h) in relation to (g) above, the implementation of proposals for fire service installations and water supplies for fire-fighting within 9 months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 26.3.2021;
- (i) the submission of a traffic review within 6 months from the date of planning approval to the satisfaction of the Commissioner for Transport or of the Town Planning Board by 26.12.2020;
- (j) in relation to (i) above, the implementation of traffic mitigation measures identified therein within 9 months from the date of planning approval to the satisfaction of the Commissioner for Transport or of the Town Planning Board by 26.3.2021;
- (k) if any of the above planning conditions (a) or (b) is not complied with during the planning approval period, the approval hereby given shall cease to have effect and shall be revoked immediately without further notice;
- (l) if any of the above planning conditions (c), (d), (e), (f), (g), (h), (i) or (j) is not complied with by the specified date, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice; and
- (m) upon expiry of the planning permission, the reinstatement of the Site to an amenity area to the satisfaction of Director of Planning or of the Town Planning Board.

Advisory Clauses

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

14. Decision Sought

- 14.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 14.2 Should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.
- 14.3 Alternatively, should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the period of which the permission should be valid on a temporary basis.

15. Attachments

Appendix I	Application Form with Attachments received on 27.4.2020
Appendix II	Relevant Extract of TPB Guidelines No. TPB PG-No. 13F for Application for Open Storage and Port Back-up Use
Appendix III	Previous Application

Appendix IV	Similar s.16 Applications for Temporary Open Storage within “Agriculture” Zone in the vicinity of the Application Site in the Hung Lung Hang Area
Appendix V	Public Comments
Appendix VI	Recommended Advisory Clauses
Drawing A-1	Site Layout Plan
Plan A-1	Location Plan
Plan A-2	Site Plan
Plans A-3a to A-3b	Aerial Photos
Plans A-4a to A-4b	Site Photos

**PLANNING DEPARTMENT
JUNE 2020**