

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/NE-TKLN/23

- Applicant** : Bliss Achieve Limited represented by Man Chi Consultants and Construction Limited
- Site** : Lots 35 RP, 36, 42 RP, 43, 44, 45 RP, 59 RP and 64 S.B RP in D.D. 80, Lin Ma Hang Road, Pak Fu Shan, New Territories
- Site Area** : About 5,147 m²
- Land Status** : Block Government Lease (demised for agricultural use)
- Plan** : Approved Ta Kwu Ling North Outline Zoning Plan (OZP) No. S/NE-TKLN/2
- Zoning** : “Recreation” (“REC”)
- Application** : Proposed Temporary Place of Recreation, Sports or Culture (Parent-Child Play Area), Eating Place and Shop and Services for a Period of 5 Years

13. The Proposal

- 1.1 The applicant seeks planning permission for proposed temporary place of recreation, sports or culture (parent-child play area), eating place and shop and services for a period of five years at the application site (the Site) (**Plan A-1**). The Site falls within an area zoned “REC” on the approved Ta Kwu Ling North OZP No. S/NE-TKLN/2. According to the Notes of the OZP for the “REC” zone, while ‘place of recreation, sports or culture’ is a Column 1 use always permitted, ‘eating place’ and ‘shop and services’ are Column 2 uses requiring planning permission from the Town Planning Board (the Board).
- 1.2 The Site is accessible from Lin Ma Hang Road (**Plan A-1**). According to the applicant, the proposed development will mainly involve three components: a parent-child play area (about 592.84 m²) with an open playground (about 782 m²) which is always permitted in “REC” zone; an eating place (about 293.75 m²) and a retail shop (about 255.37 m²) which require planning permission from the Board. The total floor area is about 1,549.6 m² comprising one 1-storey structure of 6.25 m in height (**Drawing A-1**). Four private car parking spaces (measuring 5 m x 2.5 m each) and a 26 m long loading/ unloading bay for the proposed development are proposed on the Site (**Drawing A-1**). An access point is proposed at the southwestern corner of the Site. The operation hours are from 11 a.m. to 5:30 p.m. daily. A booking system would be implemented and the Site would be open to visitors with prior reservation only. The proposed layout plan submitted by the applicant is at **Drawing A-1**. The Site is currently vacant.

1.3 In support of the application, the applicant has submitted the following documents:

- (a) Application Form with attachments received on 2.9.2019 (**Appendix I**)
- (b) Supplementary Planning Statement received on 2.9.2019 (**Appendix Ia**)
- (c) Letter received on 22.10.2019 requesting for deferment of consideration of the application (**Appendix Ib**)
- (d) Letter received on 18.2.2020 requesting for deferment of consideration of the application (**Appendix Ic**)
- (e) Letter received on 8.6.2020 requesting for deferment of consideration of the application (**Appendix Id**)
- (f) Letter received on 17.9.2020 requesting for deferment of consideration of the application (**Appendix Ie**)
- (g) Further Information (FI) received on 26.8.2020* (**Appendix If**)
- (h) FI received on 8.12.2020* consolidating all previously submitted FIs dated 27.12.2019[^], 16.1.2020[^], 28.4.2020[^] and 13.8.2020[^] with a revised Traffic Impact Assessment, response-to-comment tables, revised layout plan and replacement pages for the Planning Statement
[^] *accepted but not exempted from publication*
^{*} *accepted and exempted from publication*

1.4 On 1.11.2019, 6.3.2020, 26.6.2020 and 9.10.2020, the Rural and New Town Planning Committee (the Committee) agreed, at the request of the applicant (**Appendices Ib, Ic, Id and Ie**), to defer making decision on the application for two months each pending the preparation of further information to address the departmental comments. The applicant submitted further information on 27.12.2019, 16.1.2020, 28.4.2020, 13.8.2020, 26.8.2020 (**Appendix If**) and 8.12.2020 (**Appendix Ig**) and the application is re-scheduled for consideration by the Committee on 5.2.2021.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in the supplementary planning statement and FIs at **Appendices Ia, If and Ig**. They can be summarized as follows:

- (a) the proposed development aims to create a new holiday/ weekend destination for local residents and tourists with the locational advantage to the nearby Liantang/Heung Yuen Wai Boundary Control Point (LT/HYW BCP);
- (b) the proposed development would provide additional children play facilities to the surrounding area and help promoting physical and mental health and joyful learning experience of young children. These facilities include indoor playground, children gym/ learning centre, infant play area, virtual reality (VR) zone, experience centre etc. Retail and food & beverage facilities would also be provided;
- (c) a booking system of two sessions (i.e. 11:00 a.m. – 2 p.m. and 3 p.m. – 5:30 p.m.) per day will be implemented. A maximum of 120 visitors per session is expected. Free shuttle services would be arranged on an “on-call” basis. The applicant undertakes that all proposed car parking spaces are for its staff and shuttle service arrangement for visitors to arrive at the Site only. The Site would not be used as a public vehicle park (**Appendix Ig**). A booking system for coaches is also proposed to restrict the vehicles entering the Site (i.e. maximum two coaches/hour);

- (d) the proposed development is line with the planning intention of “REC” zone;
- (e) no adverse traffic, noise, drainage, environmental and visual impacts are anticipated from the proposed development; and
- (f) the Ta Kwu Ling District Rural Committee supports the application.

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

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

4. Previous Application

There is no previous application for the Site.

5. Similar Application

- 5.1 There is one similar application for eating place and shop and services within the same “REC” zone. The application (No. A/NE-TKLN/6) for temporary retail shop, canteen and ancillary office for a period of three years was approved by the Board on review on 13.4.2018 mainly on the grounds that the development could provide catering services to meet the needs of the construction workers within walking distance to the Liantang/Heung Yuen Wai Boundary Control Point (LT/HYW BCP); the development was not incompatible with the surrounding environment; the development was not expected to generate significant adverse traffic, landscape and environmental impacts on the surrounding areas; and there was no adverse departmental comments.
- 5.2 Details of the similar application are at **Appendix II** and its location is shown on **Plan A-1**.

6. The Site and Its Surrounding Areas (Plans A-1 to A-4)

- 6.1 The Site is:
 - (a) largely vacant and overgrown with grasses; and
 - (b) accessible from Lin Ma Hang Road.
- 6.2 The surrounding area is natural and rural in character comprising fallow agricultural land in its vicinity. There is a local road leading to a knoll to the north of the Site and the existing Tsung Yuen Ha village cluster is to its southwest across Lin Ma Hang Road (**Plan A-1**).

7. Planning Intention

The planning intention of the “REC” zone is intended primarily for low-density recreational developments for the use of the general public. It encourages the development of active and/or

passive recreation and tourism/eco-tourism. Uses in support of the low-density recreational developments may be permitted subject to planning permission.

8. Comments from Relevant Government Departments

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

Land Administration

8.1.1 Comments of the District Lands Officer/North, Lands Department (DLO/N, Lands D):

- (a) the Site comprises private lots which are Old Schedule lots held under the Block Government Lease (demised for agricultural use) without any guaranteed right of access. The applicant should make his own arrangement for acquiring access. The Government shall accept no responsibility in such arrangement, and there is no guarantee that any adjoining Government land will be allowed for the vehicular access of the proposed use;
- (b) the Site may be affected by the project namely “PWP Item No. 854TH – Widening of Eastern Section of Lin Ma Hang Road between Tsung Yuen Ha and Lin Ma Hang”;
- (c) there is a temporary movable structure being placed inside the Site. This Office reserves any right to take lease enforcement action against any breach of lease accordingly; and
- (d) should the planning application be approved, the owner(s) of the lot concerned shall apply to his office for a Short Term Waiver (STW) to cover all the proposed structures on Site. 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, the 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 fees as considered appropriate by his office.

Traffic

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

- (a) upon examined the application and FIs, he has no comment on the application from traffic engineering point of view in terms of traffic generation and attraction, proposed parking spaces, relevant satisfactory management/ control measures, etc.; and
- (b) should the application be approved, approval conditions on the submission and implementation of traffic management measures are recommended.

Project Interface

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

- (a) the southwestern part of the Site is likely to be required for carrying out the road widening works under “PWP Item No. 854TH – Widening of Eastern Section of Lin Ma Hang Road between Tsung Yuen Ha and Lin Ma Hang”. It is a designated project under the Environmental Impact Assessment Ordinance (EIAO) and the Environmental Impact Assessment (EIA) study is in progress. The final scheme of the road widening works would be subject to the completion of the EIA under EIAO and the statutory procedures. The construction programme can only be determined upon completion of the subsequent detailed design. Should the application be approved, the applicant should be advised that land resumption/clearance at any time before expiry of the planning permission might be required for the portion of land falling within the road widening works;
- (b) the proposed access to the Site will pass through a strip of area between Lin Ma Hang Road and the Site, which is an unallocated Government land (**Plan A-2**). The applicant is required to sort out the land issues with relevant land authority;
- (c) should the application be approved, the applicant is required to construct a proper ingress and egress for the Site according to HyD’s Standard Drawings and upon termination of the proposed temporary uses, the applicant is required to reinstate the ingress and egress to their original state to his satisfaction at the applicant’s cost; and
- (d) adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains.

Environment

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

- (a) he has no in-principle objection to the application;
- (b) the application is for development of a temporary parent-child play area, eating place, shop and services with ancillary car park. Wastewater generated from the kitchen, toilet or other processes within the premises might be discharged into the nearby waterbodies and cause serious water quality impact if it is not properly treated and disposed of;
- (c) as the application is temporary in nature, the applicant is advised to follow EPD’s latest “Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites (CoP)”;
- (d) should the application be approved, the applicant should be advised to strictly follow the provisions in the CoP that proper on-site sewage treatment and disposal facilities should be provided. Septic tank and soakaway (STS) system may be acceptable provided that all relevant requirements in ProPECC PN 5/93 are met on the design and construction of STS system, in

particular the percolation test and the minimum distance requirements, which should be duly certified by an Authorized Person (AP). An approval condition on the submission and implementation of the design of septic tank and soakaway system and/or other wastewater treatment facilities for the temporary canteen is recommended; and

- (e) the applicant should also be reminded of his obligation to strictly comply with all environmental protection/ pollution control ordinances, in particular Water Pollution Control Ordinance and Waste Disposal Ordinance, and to follow relevant measures given in the EPD's latest CoP, during construction and operation stages of the proposal.

Landscape Aspect

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

- (a) she has no objection to the application from the landscape planning perspective;
- (b) based on aerial photo of 2019 (**Plan A-3**) and the site photos in the submission, the Site is situated in an area of rural landscape character surrounded by temporary structures, village houses and vegetation. No significant sensitive landscape resource is observed within the Site and hence, significant adverse impact arising from the proposed development on existing landscape resources is not anticipated; and
- (c) since the Site is set back from Lin Ma Hang Road with vegetation buffer between them and there is no major public frontage along the site boundary, should the application be approved, it is considered not necessary to impose a landscape condition as the effect of additional landscaping on enhancing the quality of public realm is not apparent.

Agriculture and Nature Conservation

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

- (a) he has no strong view on the application from nature conservation point of view as the Site is overgrown with grasses of common species; and
- (b) as the adjoining "GB" zone (**Plan A-3**) is covered by trees, shrubs and herbaceous plants of common species, should the application be approved, the applicant should be reminded to perform good site practice in order not to disturb the natural habitat nearby.

Drainage

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

- (a) having examined the application and FI submitted (**Appendices Ia and If**), he has no further comment on the application from the public drainage point of view;

- (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 area; and
- (c) the Site is in an area where no public sewerage connection is available.

Building Matters

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

- (a) he has no objection to the application; and
- (b) for proposed new buildings, his advisory comments are at **Appendix IV**.

Water Supply

8.1.9 Comments of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD):

- (a) he has no objection to the application; and
- (b) for provision of water supply to the development, the applicant may need to extend his/her inside services to the nearest suitable Government water mains for connection. The applicant shall resolve any land matter (such as private lots) associated with the provision of water supply and shall be responsible for the construction, operation and maintenance of the inside services within the private lots to WSD's standards.

Fire Safety

8.1.10 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 (FSIs) and water supplies for firefighting be provided to the satisfaction of his department;
- (b) in consideration of the design/ nature of the proposal, the applicant is required to submit the relevant layout plans to his department incorporated with the proposed FSIs for approval. In preparing the submission, the applicant should note the following points:
 - (i) the layout plans should be drawn to scale and depicted with dimensions and nature of occupancy; and
 - (ii) the location of the proposed FSIs and the access for emergency vehicles should be clearly marked on the layout plans; and
- (c) the applicant is reminded that if the proposed structure(s) is required to comply with the BO (Cap. 123), detailed fire safety requirements will be formulated upon receipt of formal submission of general building plans.

Food and Environmental Hygiene

8.1.11 Comments of the Director of Food and Environmental Hygiene (DFEH):

- (a) he has no objection to the application;
- (b) relevant food licence/ restricted food permit should be obtained from FEHD in accordance with the Public Health and Municipal Services Ordinance (Cap. 132). His detailed comments are at **Appendix IV**;
- (c) no environmental nuisance should be generated to the surroundings in connection with the operation of any commercial/ trading activities; and
- (d) any waste generated from the commercial/ trading activities is regarded as trade waste, the management or owner of the Site is responsible for its removal and disposal at their expenses. The operation of any business should not cause any obstruction or environmental nuisance in the vicinity.

District Officer's Comments

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

- (a) he has consulted the locals. The First Vice-chairman of Ta Kwu Ling District Rural Committee (TKLDRC) and the Indigenous Inhabitant Representative (IIR) of Heung Yuen Wai object to the application that the Site could easily turn into a trading and logistic centre with such proposed development parameters; adverse traffic, environmental hygiene, noise and drainage impacts are anticipated; and the Lin Ma Hang Road should be widened prior to application;
- (b) the Resident Representative (RR) of Tsung Yuen Ha supports the application on the considerations that the proposed development provide job opportunities and activity space for the villagers. The proposal is well supported by the local residents;
- (c) the incumbent North District Council (NDC) member of subject constituency and the IIR of Tsung Yuen Ha have no comment on the application; and
- (d) the RR of Heung Yuen Wai did not reply to the consultation.

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

- (a) Director of Leisure and Cultural Services (DLCS);
- (b) Project Manager (North), North Development Office, Civil Engineering and Development Department (PM(N), CEDD); and
- (c) Division Commander (Ta Kwu Ling), Hong Kong Police Force (DVC TKLDIV, HKPF).

9. Public Comments Received During Statutory Publication Period (Appendix III)

The application and its FI were published for public inspections. During the statutory public inspection periods, eight public comments were received. Five public comments from the same North District Council member indicate no comment on the application. The remaining three public comments submitted by an individual objecting to the application mainly on the grounds that it is a ‘destroy to build’ application with extensive excavation and paving of land; and the Site is too remote that there is no demand for children playing facilities in the vicinity.

10. Planning Considerations and Assessments

- 10.1 The application is for a proposed temporary place of recreation, sports or culture (parent-child play area), eating place and shop and services for a period of five years on the Site zoned “REC” on the OZP (**Plan A-1**). The proposed development mainly involving a parent-child play area (about 38.2% of the total floor area) which can be considered as ‘place of recreation, sports or culture’ always permitted within the “REC” zone while eating place/ retail shop (about 35.5% of the total floor area) requiring planning permission. Although the proposed eating place and shop & services are not entirely in line with the planning intention of the “REC” zone, which is primarily for low-density recreational developments for the use of the general public and encourages the development of active and/or passive recreation and tourism/eco-tourism, such uses in support of the recreational development may be permitted subject to its compatibility with the surrounding environment and no adverse traffic, environmental and other impacts on the area.
- 10.2 CTP/UD&L advises that the Site is situated in an area of rural landscape character surrounded by temporary structures, village houses and vegetation. No significant sensitive landscape resource is observed within the Site and hence, significant adverse impact arising from the proposed development on existing landscape resources is not anticipated (**Plans A-3**). She has no objection to the application from the landscape planning perspective. DAFC has no strong view on the application from nature conservation point of view as the Site is overgrown with grasses of common species. Since the Site is adjoining the “GB” zone to its north which is covered by trees, shrubs and herbaceous plants of common species (**Plans A-2 and A-3**), should the application be approved, the applicant should be reminded to perform good site practice in order not to disturb the natural habitat nearby.
- 10.3 Upon review of the application and FI, C for T advises that he has no comment on the application from traffic engineering point of view in terms of traffic generation and attraction, proposed parking spaces, relevant satisfactory management/ control measures, etc. CHE/NTE of HyD also advises that the southwestern part of the Site is likely to be required for carrying out the road widening works under “PWP Item No. 854TH – Widening of Eastern Section of Lin Ma Hang Road between Tsung Yuen Ha and Lin Ma Hang”. Should the application be approved, the applicant would be advised that land resumption/clearance at any time before the expiry of the planning permission might be required.
- 10.4 Having examined the application and FI submitted, CE/MN of DSD has no further comment on the application from the public drainage point of view. DEP has no adverse comment on the application and advises that the applicant should follow the latest “Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites (CoP)”, perform good site practice and adopt necessary precautionary/ pollution to

prevent polluting nearby watercourse during construction and operation of the proposed development. Other relevant Government departments consulted including DLCS, DFEH, D of FS and CE/C of WSD and have no adverse comment on or no objection to the application.

- 10.5 There is one similar application (No. A/NE-TKLN/6) for temporary retail shop, canteen and ancillary office for a period of three years within the same “REC” zone. That application was approved in 2018 mainly on the grounds that the development could provide catering services to meet the needs of the construction workers within walking distance to the LT/HYW BCP; the development was not incompatible with the surrounding environment; the development was not expected to generate significant adverse traffic, landscape and environmental impacts on the surrounding areas; and there was no adverse departmental comments. The circumstances of that similar application to provide catering services to meet the needs of the construction workers nearby is not applicable to the subject application.
- 10.6 Regarding the local objection conveyed by DO(N) of HAD and the adverse public comments as detailed in paragraphs 8.1.12 and 9 above, the Government department’s comments and the planning assessments above are relevant.

11. Planning Department’s Views

- 11.1 Based on the assessments made in paragraph 11 and having taken into account the local objections conveyed by DO(N) of HAD and adverse public comments mentioned in paragraphs 8.1.12 and 9 above, the Planning Department has no objection to the application.
- 11.2 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 5 years until 5.2.2026. The following conditions of approval and advisory clauses are also suggested for Members’ reference:

Approval Conditions

- (a) no operation between 5:30 p.m. and 11:00 a.m., as proposed by the applicant, is allowed on the Site during the planning approval period;
- (b) the provision of boundary 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 5.8.2021;
- (c) 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 5.8.2021;
- (d) in relation to (c) above, the provision of drainage facilities 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 5.11.2021;
- (e) the submission of the design of septic tank and soakaway system and/or other wastewater treatment facilities within 6 months from the date of planning approval to the satisfaction of the Director of Environmental Protection or of the Town

Planning Board by 5.8.2021;

- (f) in relation to (e) above, the provision of septic tank and soakaway system and/or other wastewater treatment facilities within 9 months from the date of planning approval to the satisfaction of the Director of Environmental Protection or of the Town Planning Board by 5.11.2021;
- (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 5.8.2021;
- (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 5.11.2021;
- (i) the submission of traffic management measures within 6 months from the date of planning approval to the satisfaction of the Commissioner for Transport or of the Town Planning Board by 5.8.2021;
- (j) in relation to (i) above, the implementation of traffic management 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 5.11.2021;
- (k) the submission of the design of ingress and egress of the Site along Lin Ma Hang Road within 6 months from the date of planning approval to the satisfaction of the Director of Highways or of the Town Planning Board by 5.8.2021;
- (l) in relation to (k) above, the provision of ingress and egress of the Site along Lin Ma Hang Road within 9 months from the date of planning approval to the satisfaction of the Director of Highways or of the Town Planning Board by 5.11.2021;
- (m) if the above planning condition (a) 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; and
- (n) if any of the above planning conditions (b), (c), (d), (e), (f), (g), (h), (i), (j), (k) or (l) 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.

Advisory Clauses

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

11.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

- the proposed development under application is not in line with the planning intention of the "REC" zone which is primarily for low-density recreational developments for the use of the general public and encourages the development of active and/or passive recreation and tourism/eco-tourism. There is no strong

planning justification in the submission to justify for a departure from the planning intention, even on a temporary basis.

12. Decision Sought

- 12.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant the 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 period of which the permission should be valid on a temporary basis.
- 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 with attachments received on 2.9.2019
Appendix Ia	Supplementary Planning Statement received on 2.9.2019
Appendix Ib	Letter received on 22.10.2019 requesting for deferment of consideration of the application
Appendix Ic	Letter received on 18.2.2020 requesting for deferment of consideration of the application
Appendix Id	Letter received on 8.6.2020 requesting for deferment of consideration of the application
Appendix Ie	Letter received on 17.9.2020 requesting for deferment of consideration of the application
Appendix If	Further Information received on 26.8.2020
Appendix Ig	Further Information received on 8.12.2020
Appendix II	Similar s.16 Application within/ partly within same "REC" Zone on the Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2
Appendix III	Public Comments
Appendix IV	Recommended Advisory Clauses
Drawing A-1	Layout Plan
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plan A-4	Site Photos