

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/YL-TYST/1009

<u>Applicant</u>	: Think Grand Limited represented by Metro Planning and Development Company Limited
<u>Site</u>	: Lots 490 RP (Part), 709, 710, 711, 723, 724, 725, 729, 730, 731 and 732 in D.D. 119, Pak Sha Tsuen, Yuen Long, New Territories
<u>Site Area</u>	: 6,800 m ² (about)
<u>Lease</u>	: Block Government Lease (demised for agricultural use)
<u>Plan</u>	: Approved Tong Yan San Tsuen Outline Zoning Plan (OZP) No. S/YL-TYST/12
<u>Zoning</u>	: “Undetermined” (“U”)
<u>Application</u>	: Temporary Warehouse for Storage of Food and Electronic Goods for a Period of 3 Years

1. The Proposal

- 1.1 The applicant seeks planning permission to use the application site (the Site) for temporary warehouse for storage of food and electronic goods for a period of 3 years (**Plan A-1**). According to the Notes of the OZP for “U” zone, all uses or development except those specified in the Notes require permission from the Town Planning Board (the Board). The Site is currently mainly occupied by the applied use without valid planning permission and partly occupied by an orchard (**Plans A-2, A-4a and A-4b**).
- 1.2 The Site involves three previous applications (No. A/YL-TYST/562, 708 and 857) for various temporary warehouse or open storage with or without ancillary workshop uses (**Plan A-1**). The last application (No. A/YL-TYST/857) for proposed temporary warehouse for storage of construction materials was approved with conditions for a period of 3 years by the Rural and New Town Planning Committee (the Committee) of the Board on 13.10.2017. However, the planning permission was revoked on 13.3.2020 due to non-compliance with time-limited approval condition. Compared with the last application, the current application is submitted by a different applicant for similar warehouse use on the same site with different site layout and development parameters.

1.3 According to the applicant, the warehouse is for storage of food (such as canned milk powder and canned food) and electronic goods (such as mobile phones and tablets). No open storage, repairing, cleaning, dismantling, spraying, other workshop activities and handling/storage of electronic waste and cathode-ray tubes will be carried out at the Site. The applicant also undertakes that all existing drainage facilities/trees within the Site will be maintained/preserved at its own expense. Plans showing the vehicular access leading to the Site, site layout, tree preservation proposal, as-built drainage facilities and fire service installations (FSIs) proposal submitted by the applicant are at **Drawings A-1 to A-5** respectively.

1.4 The major development parameters of the previously approved application and the current application are summarised as follows:

Major Development Parameters	Previously Approved Application No. A/YL-TYST/857 (a)	Current Application No. A/YL-TYST/1009 (b)	Difference (b)-(a)
Applied Use	Proposed Temporary Warehouse for Storage of Construction Materials for a Period of 3 Years	Temporary Warehouse for Storage of Food and Electronic Goods for a Period of 3 Years	Change in Stored Items
Site Area	About 6,800 m ²		---
Total Floor Area (Non-domestic)	2,800 m ²	4,220 m ²	+1,420 m ² (50.7%)
No. and Height of Structures	1 • one for warehouse (10m, 1 storey)	9 • one for warehouse (10m, 1-2 storey(s)) • one for guard room (3.5m, 1 storey) • one for electricity metre room (3.5m, 1 storey) • one for water tank (7m, 1 storey) • one for pump room (3.5m, 1 storey) • two for site office (7m, 2 storeys) • one for converted containers for storage (7m, 2 storeys) • one for toilet (3.5m, 1 storey)	+8 (+800%)
No. of Parking Space	Nil		---
No. of Loading/	2		---

Unloading Space	(one for medium/heavy goods vehicle (11m x 3m) and one for container vehicle (16 m x 3.5 m))		
Operation Hours	7:00 a.m. to 9:00 p.m., with no operation on Sundays and Public Holidays	9:00 a.m. to 5:00 p.m., with no operation on Sundays and Public Holidays	Shorter operation hours

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

- (a) Application Form received on 5.3.2020 (Appendix I)
- (b) Supplementary Planning Statement (Appendix Ia)
- (c) Further Information (FI) received on 7.5.2020 providing clarification on the proposed operation hours and submission of a recent photo showing the existing run-in/out (Appendix Ib)
- (d) FI received on 19.5.2020 providing a FSIs proposal (Appendix Ic)
- (e) FI received on 11.6.2020 providing explanation on the reasons for non-compliance with approval condition of the previous application (Appendix Id)
- (f) FI received on 12.6.2020 clarifying the proposed operation (Appendix Ie)
[(c) to (f) accepted and exempted from publication and recounting requirements]

1.6 On 24.4.2020, the Committee agreed to defer a decision on the application for a period of two months, as requested by the applicant’s representative. On 7.5.2020, FI (Appendix Ib) was received and the application is submitted to the Committee for consideration at this meeting.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are mainly detailed in Section 3 of the Supplementary Planning Statement and the FIs at **Appendices Ia to Ie** respectively. They can be summarised as follows:

- (a) The Site was the subject of previous planning permissions. The previous applicant of the last application (No. A/YL-TYST/857) had complied with all approval conditions, except for the implementation of FSIs proposal. The implementation works were not accepted by relevant authority as the built layout did not tally with the accepted FSIs proposal.
- (b) According to the Town Planning Board Guidelines for “Application for Open Storage and Port Back-up Uses” (TPB PG-No.13E), the Site fell within Category 1 areas which were considered suitable for open storage and port back-up uses. The proposed development would not generate queuing of traffic outside the Site.
- (c) The proposal is in line with the planning intention of the “U” zone. A number of

open storage yards and warehouses have been approved by the Board in the vicinity of the Site. Therefore, the development is compatible with the surrounding environment. Besides, there is a shortage of land for open storage purpose in Tong Yan San Tsuen.

- (d) There will be minimal traffic, environmental, visual and drainage impacts arising from the proposal. The applicant undertakes to follow the environmental mitigation measures in the “Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Use” (Code of Practice), where applicable.

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

The applicant is not a “current land owner” but has complied with the requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31A) by posting a notice of the application outside the Site and sending the notice to the Ping Shan Rural Committee by registered post. Detailed information would be deposited at the meeting for Members’ inspection.

4. Background

The Site is currently not subject to planning enforcement action.

5. Previous Applications

- 5.1 The Site involves three previous applications (No. A/YL-TYST/562, 708 and 857) for various temporary warehouse or open storage with or without ancillary workshop uses. Details of the applications are summarised in **Appendix II** and the boundary of the site is shown on **Plan A-1**.
- 5.2 Application No. A/YL-TYST/562 for proposed temporary open storage of building materials, recycling materials (metal, plastic and paper), construction machinery and used electrical/electronic appliances and parts with ancillary workshop activities and application No. A/YL-TYST/708 for temporary open storage of building materials and construction machinery were approved with conditions each for a period of 3 years by the Committee on 10.2.2012 and 6.2.2015 respectively, mainly on the considerations that the proposals were generally in line with the then TPB PG-No. 13E; the proposals were not incompatible with the surrounding uses; approval of the application on a temporary basis would not frustrate the long-term development of the area; and the concerns of relevant government departments could be addressed by imposing approval conditions.
- 5.3 The last application (No. A/YL-TYST/857) for proposed temporary warehouse for storage of construction materials was approved with conditions for a period of 3 years by the Committee on 13.10.2017 mainly on similar considerations as those stated in paragraph 5.2 above. However, the planning permission was revoked on

13.3.2020 due to non-compliance with approval condition on implementation of FSIs proposal.

- 5.4 Compared with the last application, the current application is submitted by a different applicant for similar warehouse use on the same site with different site layout and development parameters.

6. Similar Applications

- 6.1 A total of 54 similar applications for various temporary warehouse/storage with or without open storage and/or ancillary workshop/site office uses in this part of the “U” zone had been considered by the Committee since 2008. Details of the applications are summarised in **Appendix III** and the locations of the sites are shown on **Plan A-1**.
- 6.2 All 54 applications were approved mainly on similar considerations that they were generally in line with the then TPB PG-No.13E (for cases involving open storage use); the developments were not incompatible with the surrounding open storage/warehouse uses; and departmental concerns could be addressed by imposing relevant approval conditions. However, amongst these approved applications, 16 were revoked due to non-compliance with approval conditions.
- 6.3 For Members’ information, application No. A/YL-TYST/1019 for temporary warehouse for storage of construction materials and exhibition materials for a period of 3 years, application No. A/YL-TYST/1021 for temporary warehouse for storage of furniture for a period of 3 years and application No. A/YL-TYST/1022 for temporary warehouse for storage of vehicles, vehicle parts and electronic goods for a period of 3 years within the subject “U” zone on the OZP will also be considered at this meeting (**Plan A-1**).

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

- 7.1 The Site is:
- (a) accessible via a local track leading from Kung Um Road to its east (**Drawing A-1, Plans A-2 and A-3**);
 - (b) paved and fenced off; and
 - (c) currently mainly occupied by the applied use without valid planning permission and partly occupied by an orchard.
- 7.2 The surrounding areas have the following characteristics (**Plans A-2 and A-3**):
- (a) comprise predominately warehouses and open storage/storage yards intermixed with scattered residential structures, hobby farm, graves, shrubland, unused land and vacant land;
 - (b) there are residential structures in the vicinity of the Site with the nearest one located about 15m to its south (**Plan A-2**);

- (c) to the immediate west of the Site is an area zoned “Green Belt” (“GB”) on the OZP predominated by shrubland; and
- (d) except for one open storage yard and one hobby farm operating with valid planning permissions (No. A/YL-TYST/847 and 999 respectively), the other open storage/storage yards and warehouses in the vicinity are suspected unauthorised developments (UD) subject to enforcement action taken by the Planning Authority.

8. Planning Intention

The planning intention of the “U” zone is to cater for the continuing demand for open storage, which cannot be accommodated in conventional godown premises. However, Kung Um Road is insufficient to cater for the heavy goods vehicular traffic generated from the proposed development. The area is therefore zoned “U” pending further detailed studies on the infrastructural impacts and the preparation of detailed layout plan.

9. Comments from Relevant Government Departments

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

Land Administration

- 9.1.1 Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD):

- (a) The Site comprises Old Schedule Agricultural Lots held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government.
- (b) Within the Site, Lots 709, 710 and 729 in D.D. 119 are currently covered by Short Term Waivers (STWs) No. 3607 and 3609 respectively to permit the structures erected thereon for the purpose of “Open Storage of Building Materials, Recycling Materials (Metal, Plastic and Paper), Construction Machinery and Used Electrical/ Electronic Appliances and Parts with Ancillary Workshop Activities”.
- (c) Should planning approval be given to the subject planning application, the STW holder(s) will need to apply to her office for modification of the STW conditions where appropriate and the lot owner(s) of the lot(s) without STW will need to apply to her office to permit the structures to be erected or regularise any irregularities on site, if any. Besides, given the proposed use is temporary in nature, only application for regularisation or erection of temporary structure(s) will be considered. Applications for any of the above will be considered by her department acting in the capacity of the landlord or lessor at its

sole discretion and there is no guarantee that such application will be approved. If such application is approved, it will be subject to such terms and conditions, including among others the payment of rent or fee, as may be imposed by her department.

Traffic

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

- (a) The land status of the access road/path/track leading to the Site from Kung Um Road shall be checked with the lands authority.
- (b) The management and maintenance responsibilities of the access road/path/track shall be clarified and consulted with the relevant management and maintenance authorities accordingly.
- (c) The applicant is reminded that sufficient space should be provided within the Site for manoeuvring of vehicles. In addition, no parking, queuing and reverse movement of vehicles on public road are allowed.

9.1.3 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD):

- (a) Adequate drainage measures should be provided at the site access to prevent surface water flowing from the Site to nearby public roads/drains.
- (b) His department shall not be responsible for the maintenance of any access connecting the Site and Kung Um Road.

Environment

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

- (a) He does not support the application as there are sensitive receivers of residential use in the vicinity (with the nearest one located about 15m to the south of the Site) (**Plan A-2**) and the applied use will cause traffic of heavy vehicles; environmental nuisance is expected.
- (b) There was no substantiated environmental complaint concerning the Site received in the past three years.
- (c) Should the planning application be approved, the applicant should be advised to follow relevant mitigation measures and requirements in the latest Code of Practice to minimise any potential environmental nuisances to the surrounding areas.

Nature Conservation

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

- (a) She has no strong view on the application from nature conservation point of view as the Site has been occupied for similar storage use as approved previously.
- (b) Should the planning application be approved, the applicant is advised to properly maintain the boundary fence and periphery planting in the Site and avoid affecting the “GB” zone immediately adjoining the Site and the trees thereon.

Drainage

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

- (a) He has no objection in principle to the development.
- (b) Based on the drainage proposal/planning statement enclosed in the application (**Drawing A-4** and **Appendix Ia**), apparently the applicant would maintain the same drainage facilities as those implemented under previous planning application No. A/YL-TYST/857.
- (c) Should the Board consider that the application is acceptable from the planning point of view, approval conditions requiring the maintenance of the existing drainage facilities implemented under application No. A/YL-TYST/857 and submission of records of the existing drainage facilities on the Site to the satisfaction of the Director of Drainage Services or of the Board should be stipulated.

Fire Safety

9.1.7 Comments of the Director of Fire Services (D of FS):

- (a) He has no objection in principle to the proposal subject to FSIs being provided to his satisfaction.
- (b) In consideration of the design/nature of the proposal, 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 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 FSIs to be installed should be clearly marked on the layout plans.
- (c) He has the following comments on the submitted FSIs proposal (**Drawing A-5**):

- (i) Sprinkler inlets should be located near the entrance and clearly indicated on FSI plans.
 - (ii) Volume of all compartments should be provided.
 - (iii) FS notes should clearly state whether static/dynamic smoke extraction system will be provided.
 - (iv) If static/dynamic smoke extraction system is not provided, FS notes should clearly state that the openable windows with aggregate area exceeding 6.25% of the floor area should be provided for any fire compartment exceeding 7,000 cubic metres.
 - (v) The openable windows, if provided, should be clearly indicated on FSI plans.
- (d) Furthermore, the applicant is reminded that if the proposed structure(s) is required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.

Building Matters

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

- (a) As there is no record of approval granted by the Building Authority (BA) for the existing structures at the Site, he is not in a position to offer comments on their suitability for the use proposed in the application.
- (b) The applicant's attention is drawn to the following points:
 - (i) If the existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of the BA, they are unauthorised building works (UBW) under the BO and should not be designated for any proposed use under the application.
 - (ii) For UBW erected on leased land, enforcement action may be taken by the BD to effect their removal in accordance with the prevailing 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.
 - (iii) Before any new building works (including containers/open sheds as temporary buildings, demolition and land filling) are to be carried out on the

Site, prior approval and consent of the BA should be obtained, otherwise they are UBW. An Authorised Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO.

- (iv) The Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively.
- (v) The Site does not abut on a specified street of not less than 4.5m wide and its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at the building plan submission stage.

Long-Term Development

9.1.9 Comments of the Chief Engineer/Cross-Boundary Infrastructure and Development, Planning Department (CE/CID, PlanD):

- (a) The Civil Engineering and Development Department (CEDD) and PlanD jointly commissioned the “Planning and Engineering Study for Housing Sites in Yuen Long South (YLS) – Investigation”. According to the Revised Recommended Outline Development Plan (RODP) of YLS promulgated in May 2020, the Site falls within areas zoned as “Special Residential - Public Rental Housing (with Commercial)” (“RSc”) and “Other Specified Uses” (“OU”) annotated “Hillside River Corridor with Scenic Cycle Track”, as well as an area shown as ‘Road’.
- (b) The objective of YLS is to transform the degraded rural land predominantly occupied by brownfield operations including open storage yards, warehouses and rural industrial uses into housing and other uses with supporting infrastructure and community facilities, and to improve the existing environment. It is noted that the application is for temporary use for a period of 3 years. In considering the application for temporary uses, due consideration should be given on the possible implication on land clearance which would affect the future implementation of YLS.

9.1.10 Comments of the Project Manager (West), CEDD (PM(W), CEDD):

- (a) He has no objection to the subject application.
- (b) However, based on the preliminary project boundary of the proposed YLS Development, the Site falls within the boundary of the proposed YLS Development – Stage 3. The YLS Development would provide land to meet the medium to long term housing needs of Hong Kong and its detailed implementation programme with phasing and packaging of works for YLS Development is being formulated.

District Officer's Comments

9.1.11 Comments of the District Officer (Yuen Long), Home Affairs Department (DO(YL), HAD):

Her office has not received any comment from the village representatives in the vicinity regarding the application.

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

- (a) Director of Electrical and Mechanical Services (DEMS);
- (b) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
and
- (c) Commissioner of Police (C of P).

10. Public Comment Received During the Statutory Publication Period

On 13.3.2020, the application was published for public inspection. During the first three weeks of the statutory public inspection period, no public comment was received.

11. Planning Considerations and Assessments

11.1 The application is for temporary warehouse for storage of food and electronic goods for a period of 3 years at a site zoned "U" on the OZP. The proposal is not in conflict with the planning intention of the "U" zone which is intended for open storage use but is designated with this zoning mainly due to concerns of the capacity of Kung Um Road. In this regard, C for T has no adverse comment on the application. Whilst the Site falls within areas zoned "R2c" and "OU" annotated "Hillside River Corridor with Scenic Cycle Track", as well as an area shown as 'Road' on the Revised RODP of YLS, CE/CID of PlanD does not raise objection to the application and PM(W), CEDD has no objection to the proposed temporary use for 3 years. Approval of the application on a temporary basis of 3 years would not jeopardise the long-term development of the area.

11.2 The surrounding areas comprise predominantly warehouses and open storage/storage yards (**Plan A-2**). Although there are residential structures in the vicinity, the development is generally not incompatible with the surrounding uses in the subject "U" zone.

11.3 There is no adverse comment on the application from concerned government departments, except DEP. DEP does not support the application as there are sensitive receivers of residential use in the vicinity of the Site (with the nearest one located about 15m to the south of the Site) (**Plan A-2**), and the applied use will cause traffic of heavy vehicles; environmental nuisance is expected. However, there has been no environmental complaint concerning the Site received in the past 3 years. Furthermore, relevant approval conditions are recommended in paragraph 12.2 below to minimise any potential environmental nuisances or to address the technical requirements of other concerned government departments. Any non-compliance with the approval conditions will result in revocation of the planning permission and UD on the Site will be subject to enforcement action by

the Planning Authority. Should the planning application be approved, the applicant will also be advised to follow the latest Code of Practice to minimise any potential environmental impact on the surrounding areas.

- 11.4 Given that one previous approval for warehouse use has been granted to the Site and 54 similar applications have been approved in this part of the “U” zone since 2008, approval of the current application is generally in line with the Committee’s previous decisions.
- 11.5 There is no public comment received on the application during the statutory publication period.

12. Planning Department’s Views

- 12.1 Based on the assessments made in paragraph 11, the Planning Department considers that the temporary warehouse for storage of food and electronic goods could be tolerated for a period of 3 years.
- 12.2 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 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 5:00 p.m. and 9:00 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) no open storage, repairing, cleaning, dismantling, spraying, other workshop activities and handling/storage of electronic waste and cathode-ray tubes, as proposed by the applicant, is allowed on the Site at any time during the planning approval period;
- (d) no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (e) all existing trees within the Site shall be maintained at all times, as proposed by the applicant, during the planning approval period;
- (f) the existing boundary fencing on the Site shall be maintained at all times during the planning approval period;
- (g) the existing drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (h) the submission of a condition record of the existing drainage facilities on Site within **3** months from the date of planning approval to the satisfaction

of the Director of Drainage Services or of the Town Planning Board by 26.9.2020;

- (i) the submission of a revised fire service installations proposal 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;
- (j) in relation to (i) above, the implementation of the fire service installations proposal 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;
- (k) if any of the above planning conditions (a), (b), (c), (d), (e), (f) or (g) 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
- (l) if any of the above planning conditions (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.

Advisory clauses

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

- 12.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Member's reference:

the applicant fails to demonstrate that the development would not generate adverse environmental impact on the surrounding areas.

13. Decision Sought

- 13.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 13.2 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.
- 13.3 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.

14. Attachments

- Appendix I** Application Form received on 5.3.2020
- Appendix Ia** Supplementary Planning Statement
- Appendix Ib** FI dated 7.5.2020

Appendix Ic	FI dated 19.5.2020
Appendix Id	FI dated 11.6.2020
Appendix Ie	FI dated 12.6.2020
Appendix II	Previous Applications covering the Site
Appendix III	Similar Applications in this Part of the “U” Zone on the OZP since 17.10.2008
Appendix IV	Recommended Advisory Clauses
Drawing A-1	Vehicular Access Plan
Drawing A-2	Site Layout Plan
Drawing A-3	Tree Preservation Proposal
Drawing A-4	As-built Drainage Plan
Drawing A-5	FSIs Proposal
Plan A-1	Location Plan with Previous and Similar Applications
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4a and A-4b	Site Photos

**PLANNING DEPARTMENT
JUNE 2020**