RNTPC Paper No. <u>A/YL-TYST/881</u> For Consideration by the Rural and New Town Planning Committee on 16.3.2018

<u>APPLICATION FOR PERMISSION</u> <u>UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE</u>

APPLICATION NO. A/YL-TYST/881

<u>Applicant</u>	:	Mr. HO Chak Ming
<u>Site</u>	:	Lot 1231 S.B ss. 1 (Part) in D.D. 119 and Adjoining Government Land, Pak Sha Tsuen, Yuen Long, New Territories
Site Area	:	158 m ² (about) (including Government land of about 15 m ²)
Lease	:	Block Government Lease (demised for agricultural use)
<u>Plan</u>	:	Draft Tong Yan San Tsuen Outline Zoning Plan (OZP) No. S/YL-TYST/11
Zoning	:	"Undetermined" ("U")
Application	:	Temporary Vehicle Repair Workshop for a Period of 3 Years

1. <u>The Proposal</u>

- 1.1 The applicant seeks planning permission to use the application site (the Site) for temporary vehicle repair workshop for a period of 3 years (**Plan A-1**). The Site is the subject of one previous application (No. A/YL-TYST/832) for the same use by the same applicant with the same development parameters but different ingress/egress arrangement (**Drawings A-3 to A-5**), which was rejected by the Rural and New Town Planning Committee (the Committee) of the Town Planning Board (the Board) on 28.7.2017. The Site is currently occupied by the applied use without valid planning permission (**Plans A-2, A-4a and A-4b**).
- 1.2 The major development parameters of the application are as follows:

Site Area	About 158 m ²	
Total Floor Area	208 m ²	
(Non-domestic)		
No. of Structures	1	
	(for shelter, storage and office uses)	
Height of Structures	5.8m	
	(2 storeys)	
Operation Hours	10:00 a.m. to 4:00 p.m. Mondays to Saturdays	
	with no operation on Sundays and public holidays	

- 1.3 The Site is accessible via a local track leading from Kung Um Road to its east (**Plan A-2**). According to the applicant, the vehicle repair workshop only provides private car repairing services. The clients will drive the vehicles that have to be repaired to the Site by themselves, and there will not be more than five vehicles that enter/exit the Site per week. There will be different locations for ingress and egress, with widths of 3.8m and 5.6m respectively (**Drawing A-5**). The applicant undertakes that no repairing of light, medium or heavy goods vehicle and no paint-spraying and car washing will be carried out at the Site. Also, reversing of vehicles will only be taken place within the Site. Plans showing the vehicular access leading to the Site, site layout, vehicular parking, ingress and egress, submitted by the applicant are at **Drawings A-1 to A-5** respectively.
- 1.4 In support of the application, the applicant has submitted the following documents:

(a)	Application Form received on 19.1.2018	(Appendix I)
(b)	Further Information dated 28.2.2018 responding to the Transport Department's comments with new plans showing vehicular parking and egress towards Kung Um Road	(Appendix Ia)
(c)	Further Information dated 8.3.2018 providing a plan showing the widths of the workshop, ingress and egress, and undertaking that there will be no reversing of vehicles outside the Site	(Appendix Ib)

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in Section 9 of the Application Form at **Appendix I** and the further information at **Appendices Ia and Ib**. They can be summarized as follows:

- (a) The operation hours of the temporary vehicle repair workshop is 10:00 a.m. to 4:00 p.m. Mondays to Saturdays with no operation on Sundays and public holidays.
- (b) The temporary vehicle repair workshop will only provide private car repairing services. No light, medium and heavy goods vehicles repairing services will be provided at the Site. Also, the workshop will only be used for vehicle repairing. No paint-spraying and car washing services will be provided at the Site.
- (c) The clients will drive the vehicles that have to be repaired to the temporary vehicle repair workshop by themselves. There are no more than five cars which enter/exit the Site each week.
- (d) Reversing of vehicles will only be taken place within the Site, thus not affecting traffic on nearby roads.

3. <u>Compliance with the "Owner's Consent/Notification" Requirements</u>

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 obtaining the consent of the "current land owner". Detailed information would be deposited at the meeting for Members' inspection.

4. <u>Background</u>

The use in the Site is subject to investigation. Should a material change of use be identified and confirmed in the Site, which constitutes an unauthorized development under the Town Planning Ordinance, enforcement action would be instigated.

5. <u>Previous Application</u>

- 5.1 The Site was involved in one previous application (No. A/YL-TYST/832) for the same use by the same applicant on the same site and was rejected by the Committee on 28.7.2017. In that application, only one vehicular ingress/egress was proposed on the eastern part of the Site. C for T considered that the applicant's submission could not demonstrate that sufficient space within the Site would be provided for manoeuvring of vehicles, and could not demonstrate no reverse movement of vehicles through the ingress/egress. The application was rejected for the reason that the applicant failed to demonstrate that the applied development would not cause adverse traffic impact on the surrounding area. Details of the applications are summarized in **Appendix II** and the site is shown on **Plan A-1**.
- 5.2 Compared with the last application, the current application is submitted by the same applicant for the same use and involves a change in the ingress/egress arrangement with separated ingress and egress (Drawings A-3 to A-5). The major development parameters and site layout remain largely the same.

6. <u>Similar Applications</u>

- 6.1 A total of 24 similar applications for various types of repair workshop with or without open storage and/or ancillary office uses in the "U" zone had been considered by the Committee. Details of the applications are summarized in **Appendix III** and the locations of the sites are shown on **Plan A-1**.
- 6.2 There are 16 applications approved mainly on similar considerations that they were generally in line with TPB PG-No.13E (for cases involving open storage use); the developments were not incompatible with the surrounding open storage/warehouse/workshop uses and the concerns of relevant Government departments could be addressed by imposing approval conditions. However, amongst these approved applications, 3 were revoked due to non-compliance with approval conditions.

6.3 There are 8 applications rejected mainly on the grounds that the development were not compatible with the surrounding rural or residential use and there was insufficient information in the submissions to demonstrate that the development would not generate adverse environmental, drainage, landscape, traffic and/or fire safety impacts on the surrounding areas.

7. <u>The Site and Its Surrounding Areas</u> (Plans A-2 to A-4b)

- 7.1 The Site is:
 - (a) accessible via a local track leading from Kung Um Road to its east (Plan A-2);
 - (b) paved and partly fenced off (**Plans A-4a and A-4b**); and
 - (c) currently occupied by the applied use without valid planning permission (Plans A-2, A-4a and A-4b).
- 7.2 The surrounding areas have the following characteristics:
 - (a) the surrounding areas are mixed with warehouses, open storage/storage yards, vehicle repair workshops, scattered residential structures, converted containers, fallow agriculture land, vacant land/structures and unused land;
 - (b) scattered residential structures are found in the vicinity of the Site with the nearest one about 15m to its northwest (**Plan A-2**);
 - (c) except the storage to the north of the Site and the open storage yard to the southeast of the Site, which is 'existing use' tolerated under the Town Planning Ordinance; and the warehouses to the northeast, east and south and the open storage yards to the southeast and south of the Site, which are covered by planning permission under applications No. A/YL-TYST/796, 806, 831, 825 and 777 respectively, the other warehouses, open storage/storage yards, vehicle repair workshops in the vicinity are mostly suspected unauthorized developments subject to enforcement action taken by the Planning Authority.

8. <u>Planning Intention</u>

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

9.1 The following Government departments have been consulted and their views on

the application are summarized as follows:

Land Administration

- 9.1.1 Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD):
 - (a) The Site comprises an 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) No permission is given for occupation of Government land (GL) (about $15m^2$ subject to verification) included in the Site. Attention is drawn to the fact that any occupation of GL without Government's prior approval is not allowed.
 - (c) The Site is accessible to Kung Um Road via GL and private land. Her office does not provide maintenance work for GL involved and does not guarantee any right-of-way to the Site.
 - (d) The Site does not fall within Shek Kong Airfield Height Restriction Area.
 - (e) Should planning approval be given to the subject planning application, the lot owner(s) will need to apply to her office to permit the structures to be erected or regularize any irregularities on site. Furthermore, the applicant has to either exclude the GL portion from the Site or apply for a formal approval prior to the actual occupation of the GL portion. Such application(s) will be considered by LandsD acting in the capacity of the landlord or lessor at its sole discretion and there is no guarantee that such application(s) will be approved. If such application(s) is approved, it will be subject to such terms and conditions, including among others the payment of premium or fee, as may be imposed by LandsD.

<u>Traffic</u>

- 9.1.2 Comments of the Commissioner for Transport (C for T):
 - (a) He notes that the applicant has submitted further information on the proposed ingress and egress of the proposed temporary vehicle repair workshop to address his previous concern.
 - (b) He understands that the proposed temporary vehicle repair workshop will attract only maximum 5 private cars per week and the operation hours will be from 10:00 a.m. to 4:00 p.m. on Monday to Saturday except Sunday and public holidays. He has no further comment on the proposed ingress and egress as shown in the further information.

- (c) The operation hours of the vehicle repair workshop should be restricted from 10:00 a.m. to 4:00 p.m. on normal weekdays as proposed by the applicant.
- (d) The applicant is reminded that sufficient space within the Site should be provided for manoeuvring of vehicles. In addition, no parking, queuing and reverse movement of vehicles on public road are allowed.
- (e) The applicant should implement the ingress/egress proposal of the temporary vehicle repair workshop to the satisfaction of C for T or the Board.
- (f) The land status of the access road/path/track leading to the Site at Kung Um Road should be checked with the lands authority.
- (g) The management and maintenance responsibilities of the access road/path/track should be clarified with the relevant management and maintenance authorities accordingly.
- 9.1.3 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD):
 - (a) The access arrangement should be commented by the Transport Department.
 - (b) Adequate drainage measures should be provided at the site access to prevent surface water flowing from the Site to nearby public roads/drains.
 - (c) 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) DEP does not support the application as there are sensitive receivers of residential use in the vicinity (with the nearest one about 15m to the northwest of the Site) (Plan A-2), and environmental nuisance is expected.
 - (b) There were 3 substantiated environmental complaints concerning the Site received in 2016, which were concurrent cases. The complaint was about air nuisance, polluting effluent discharged, noise nuisance and chemical waste generated from a garage (合 成車行) at Lot 1231, D.D.119, Pak Sha Tsuen, Yuen Long. Inspections revealed that air nuisance and noise nuisance were not substantiated. However, complaint about polluting effluent discharged was substantiated as a discharge pipe from the toilet to the nearby watercourse was noted. Also, complaint about chemical waste was substantiated as there was no valid Chemical

Waste Producer License and there were Chemical Waste containers without proper label. Prosecution action against non-compliance with Waste Disposal (Chemical Waste) (General) Regulation was taken. Subsequently, the discharge pipe in question was blocked and the toilet was changed to a store room; and the garage obtained a Chemical Waste Producer License on 13.5.2016. There has been no subsequent complaint concerning the Site received.

(c) Should the planning application be approved, the applicant will be 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".

Drainage

- 9.1.5 Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD):
 - (a) He has no objection in principle to the proposed development from the public drainage point of view.
 - (b) Should the Board consider that the application is acceptable from the planning point of view, approval conditions requiring the submission of a drainage proposal and implementation and maintenance of the drainage proposal for the development to the satisfaction of the Director of Drainage Services or of the Board should be stipulated.

Water Supply

- 9.1.6 Comments of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD):
 - (a) He has no objection to the application.
 - (b) Water mains in the vicinity of the Site cannot provide the standard pedestal hydrant.

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 fire service installations (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. The applicant should be advised on the following points:

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) However, the applicant is reminded that if the proposed structure(s) is required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire services requirements will be formulated upon receipt of formal submission of general building plans.

Building Matters

(i)

- 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 by the Building Authority 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 approval of the BD, they are unauthorized 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 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.
 - (iii) Before any new building works (including containers/open sheds as temporary buildings and land filling) are to be carried out on the Site, prior approval and consent of the BD should be obtained, otherwise they are UBW. An Authorized 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) If the Site does not abut on a specified street of not less

than 4.5m wide, its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at the building plan submission stage.

Others

- 9.1.9 Comments of the Director of Electrical and Mechanical Services (DEMS):
 - (a) He has no comment on the application from electricity supply safety aspect.
 - (b) However, in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable or overhead line under the application should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans (and overhead line alignment drawings, where applicable) to find out whether there is any underground cable and/or overhead line within and/or in the vicinity of the Site. The parties concerned should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the "Code of Practice on Working near Electricity Supply Lines" established under the Regulation when carrying out works in the vicinity of the electricity supply lines.
- 9.1.10 Comments of the Chief Engineer/Cross-boundary and Infrastructure Development, Planning Department (CE/CID, PlanD):
 - (a) CEDD and PlanD jointly commissioned the "Planning and Engineering Study for Housing Sites in Yuen Long South (YLS)
 Investigation" (the Study). According to the Recommended Outline Development Plan (RODP) of YLS promulgated on 8.8.2017, the subject site falls within an area zoned as "Residential Zone 2 (with commercial)" ("R2c").
 - (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. As regard the implementation programme of YLS, we would leave it for CEDD to advise.
- 9.1.11 Comments of the Project Manager (West), Civil Engineering and Development Department (PM(W), CEDD):
 - (a) He has no objection to the temporary use for 3 years, which

should be considered in accordance with the provisions of the current OZP and existing infrastructure capacities.

(b) However, the Site falls within the boundary of Yuen Long South Development. According to the Study, to ensure timely and orderly implementation, the development of YLS and relevant site formation and infrastructure works would be implemented in four stages. The lot(s) concerned falls within a site under Stage 3 Works. While the detailed implementation programme for the project is still being formulated, based on the Study, it is envisaged that clearance of the Site in question will not be arranged before the first population intake of the YLS Development expected in 2027.

District Officer's Comments

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

The local consultation was completed on 20.2.2018 and his office has not received any comments, 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 Agriculture, Fisheries and Conservation (DAFC); and
 - (b) Commissioner of Police (C of P).

10. Public Comment Received During the Statutory Publication Period

On 26.1.2018, the application was published for public inspection. During the first three weeks of the statutory public inspection period, which ended on 20.2.2018, no public comment was received.

11. Planning Considerations and Assessments

11.1 The subject application is for temporary vehicle repair workshop for a period of 3 years on the Site falling within an area zoned "U" on the OZP. The applied use is not in conflict with the planning intention of the "U" zone on the OZP which is generally intended to cater for the continuing demand for open storage which cannot be accommodated in conventional godown premises 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 an area zoned "R2c" on the RODP of YLS promulgated on 8.8.2017, CE/CID of PlanD does not raise objection to the application and PM(W) of CEDD has no objection to the proposed temporary use for 3 years. As such, approval of the application on a temporary basis would not frustrate the long-term use of the area.

- 11.2 The surrounding areas of the Site in the subject "U" zone are mainly occupied by warehouses, open storage/storage yards and vehicle repair workshops. As such, the development is not incompatible with the surrounding use 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 about 15m to the northwest of the Site (Plan A-2), and environmental nuisance is Moreover, there were 3 substantiated environmental complaints expected. concerning the Site received in 2016 and prosecution action was taken. However, as advised by DEP, the applicant has rectified the non-compliance with the Waste Disposal (Chemical Waste) (General) Regulation, and no subsequent environmental complaint concerning the Site has been received. To address the concerns on the possible environmental nuisances generated by the temporary use or to address the technical requirements of other concerned government departments, relevant approval conditions are recommended in paragraph 12.2 below. Any non-compliance with the approval conditions will result in revocation of the planning permission and unauthorized development 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 relevant mitigation measures and requirements in the "Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites" in order to minimize any potential environmental impact.
- 11.4 The previous application (No. A/YL-TYST/832) for same use was rejected by the Committee for traffic reason (see paragraph 5.1 above). In the current application, separate ingress and egress with widths of 3.8m and 5.6m respectively are proposed (**Drawings A-3 to A-5**) and C for T has no adverse comment on the application. As such, the previous concern on traffic aspect has been satisfactorily addressed.
- 11.5 Given that the Committee has approved 16 similar applications in the vicinity of the Site, approval of the subject application is also in line with the Committee's previous decisions.
- 11.6 There is no public comment received on the application during the statutory publication period.

12. <u>Planning Department's Views</u>

- 12.1 Based on the assessments made in paragraph 11, the Planning Department considers that the temporary vehicle repair workshop <u>could be tolerated</u> 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 <u>16.3.2021</u>. The following approval conditions and advisory clauses are also suggested for Members' reference:

Approval conditions

- (a) no operation between 4:00 p.m. and 10:00 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 paint-spraying, car washing and repairing of light, medium or heavy goods vehicle, as defined in the Road Traffic Ordinance, as proposed by the applicant, are 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) the provision of boundary fence 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 <u>16.9.2018</u>;
- (f) the implementation of the accepted ingress/egress proposal within 6 months from the date of planning approval to the satisfaction of the Commissioner of Transport or of the Town Planning Board by <u>16.9.2018</u>;
- (g) 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 <u>16.9.2018</u>;
- (h) in relation to (g) above, the implementation of the 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 <u>16.12.2018;</u>
- (i) in relation to (h) above, the implemented drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (j) the submission of a 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 <u>16.9.2018</u>;
- (k) in relation to (j) 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 <u>16.12.2018</u>;
- (1) if any of the above planning conditions (a), (b), (c), (d) or (i) 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;
- (m) if any of the above planning conditions (e), (f), (g), (h), (j) or (k) 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

(n) upon the expiry of the planning permission, the reinstatement of the Site to an amenity area to the satisfaction of the Director of Planning or of the Town Planning Board.

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 Members' 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 19.1.2018
Appendix Ia	Further Information dated 28.2.2018 responding to the Transport Department's comments with new plans showing vehicular parking and egress towards Kung Um Road
Appendix Ib	Further Information dated 8.3.2018 providing a plan showing the widths of the workshop, ingress and egress, and undertaking that there will be no reversing of vehicles outside the Site.
Appendix II	Previous Application covering the Application Site
Appendix III	Similar Applications in this Part of the "U" Zone on the Tong Yan San Tsuen OZP since the Promulgation of TPB PG-No. 13E
Appendix IV	Recommended Advisory Clauses

Drawing A-1	Plan showing the Vehicular Access leading to the Site
Drawing A-2	Site Layout Plan
Drawing A-3	Plans showing Vehicular Parking, Ingress and Egress
Drawing A-4	Plans showing Vehicular Parking and Egress towards Kung Um Road
Drawing A-5	Plan showing the Widths of the Workshop, Ingress and Egress
Plan A-1	Location Plan with Similar Applications
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4a and A4-b	Site Photos

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