

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/YL-TYST/969

- Applicant** : Hang Sing Limited represented by Metro Planning and Development Company Limited
- Site** : Lots 1415 RP, 1416 RP, 1426 (Part) and 1427 (Part) in D.D. 119 and Adjoining Government Land (GL), Shan Ha Tsuen, Yuen Long, New Territories
- Site Area** : 818 m² (about) (including about 94 m² of GL)
- Lease** : Block Government Lease (demised for agricultural use)
- Plan** : Approved Tong Yan San Tsuen Outline Zoning Plan (OZP) No. S/YL-TYST/12
- Zoning** : “Undetermined” (“U”)
- Application** : Temporary Warehouse for Storage of Stage Equipment 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 stage equipment for a period of 3 years (**Plan A-1a**). According to the Notes of the OZP for the “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 occupied by the applied use without valid planning permission (**Plans A-2, A-4a and A-4b**).
- 1.2 The Site was involved in 6 previous applications (No. A/YL-TYST/326, 340, 425, 590, 730 and 794) (**Plan A-1b**) for various temporary open storage or warehouse uses. The last application (No. A/YL-TYST/794) for temporary warehouse for storage of brand new electronic goods was approved with conditions by the Rural and New Town Planning Committee (the Committee) of the Board for a period of 3 years on 15.7.2016. All the approval conditions under the last application had been complied with and the planning permission had lapsed on 16.7.2019. Details of the previous applications are summarised at paragraph 5 and **Appendix II**. Compared with the last application, the current application is submitted by the

same applicant for a different warehouse use covering the same site with largely the same site layout and development parameters on the same site.

- 1.3 According to the applicant, the Site is proposed for storage of stage equipment including stage works and lighting and sound systems. No medium/heavy goods vehicle exceeding 5.5 tonnes, including container tractor/trailer, will be allowed to enter the Site. No open storage, repairing, dismantling, spraying, cleaning and other workshop activities and handling of used electrical appliances, electronic waste and computer/electronic parts (including cathode-ray tubes) will be carried out at the Site. The applicant undertakes to maintain/preserve all existing drainage facilities/trees within the Site at his own expense. Plans showing the vehicular access leading to the Site, site layout, landscape and tree preservation proposal and proposed drainage facilities submitted by the applicant are at **Drawings A-1** to **A-4** respectively.
- 1.4 The major development parameters of the application remain largely the same from the last application (No. A/YL-TYST/794) and they are summarised as follows:

Major Development Parameters	Previously Approved Application No. A/YL-TYST/794 (a)	Current Application No. A/YL-TYST/969 (b)	Difference (b)-(a)
Applied Use	Temporary Warehouse for Storage of Brand New Electronic Goods for a Period of 3 Years	Temporary Warehouse for Storage of Stage Equipment for a Period of 3 Years	Change in the item stored
Site Area	818 m ² (about) (including GL of about 94m ²)		---
Total Floor Area (Non-domestic)	418 m ² (about)		---
No. and Height of Structures	2 <ul style="list-style-type: none"> • one warehouse with site office (6.5m, 2 storeys) • one warehouse with site office and toilet (6.5m, 1 storey) 		---
No. of Parking Spaces	Nil		---
Loading/Unloading Spaces	2 (7m x 3.5m) (for private cars/light goods vehicles)		---
Operation Hours	7:00 a.m. to 7:00 p.m. Mondays to Saturdays, with no operation on Sundays and Public Holidays	9:00 a.m. to 7:00 p.m. Mondays to Saturdays, 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 3.6.2019 (Appendix I)
- (b) Supplementary Planning Statement (Appendix Ia)
- (c) Supplementary Information received on 3.6.2019 providing updated executive summary (Appendix Ib)
- (d) Supplementary Information received on 10.6.2019 providing clarification on the site area (Appendix Ic)
- (e) Further Information received on 25.7.2019 clarifying the operation hours (Appendix Id)
[accepted and exempted from publication and recounting requirements]

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in Section 3 of the Supplementary Planning Statement in **Appendix Ia**. They can be summarised as follows:

- (a) According to the Town Planning Board Guidelines for “Application for Open Storage and Port Back-up Uses” (TPB PG-No. 13E), the Site falls within Category 1 areas which is considered suitable for open storage and port back-up uses. The development should have fulfilled the guidelines to a large extent and should be given favorable consideration by the Board.
- (b) The proposed development is in line with the planning intention of the “U” zone. A number of open storage yards have been approved by the Board in the vicinity of the Site. The proposed development is compatible with the surrounding environment. There is a shortage of land for open storage in Tong Yan San Tsuen.
- (c) The Site is subject to previous applications. All the planning conditions imposed to the last application have been complied with.
- (d) There will be minimal environmental, drainage, visual and traffic 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. Also, the negligible increase in traffic would not aggravate the traffic condition of Shan Ha Road and the road networks in the area.

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 was the subject of 6 previous applications (No. A/YL-TYST/326, 340, 425, 590, 730 and 794) for various temporary open storage or warehouse uses. Details of the applications are summarised in **Appendix II** and the boundaries of the sites are shown on **Plan A-1b**.
- 5.2 Applications No. A/YL-TYST/326, 340, 425 and 590 for temporary open storage of metal ware and/or plastic goods including containers and road signs uses were approved with conditions each for a period of 2 to 3 years by the Committee on 18.8.2006, 15.12.2006, 8.5.2009 and 1.6.2012 respectively, mainly on the considerations that the development was not incompatible with the surrounding areas; and departmental concerns could be addressed by imposing approval conditions. However, application No. A/YL-TYST/326 was subsequently revoked on 18.2.2007 due to non-compliance with approval conditions.
- 5.3 Applications No. A/YL-TYST/730 and 794 for temporary warehouse for storage of brand new electronic goods were approved with conditions each for a period of 3 years by the Committee on 22.5.2015 and 15.7.2016 respectively on similar considerations as those stated above. However, application No. A/YL-TYST/730 was subsequently revoked on 22.5.2016 due to non-compliance with approval conditions on the provision of boundary fence and landscape proposal. All the time-limited approval conditions under the last application had been complied with and the planning permission had lapsed on 16.7.2019.
- 5.4 Compared with the last application, the current application is submitted by the same applicant for a different warehouse use covering the same site with largely the same site layout and development parameters.

6. Similar Applications

- 6.1 A total of 45 similar applications for various temporary warehouse/storage with or without open storage and/or ancillary site office uses in this part of the "U" zone had been considered by the Committee since the promulgation of TPB PG-No. 13E on 17.10.2008. Details of the applications are summarised in **Appendix III** and the locations of the sites are shown on **Plan A-1a**.
- 6.2 All 45 applications were 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 uses; and the concerns of relevant Government departments could be addressed by imposing relevant approval conditions. However, amongst

these approved applications, 12 were revoked due to non-compliance with approval conditions.

- 6.3 For Members' information, application No. A/YL-TYST/971 for temporary warehouse for storage of paper products and electronic goods and application No. A/YL-TYST/972 for temporary warehouse for storage of construction materials at the southern part of the subject "U" zone will also be considered at this meeting (**Plan A-1a**).

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

7.1 The Site is:

- (a) accessible via a local track leading from Shan Ha Road to its further northwest (**Drawing A-1** and **Plan A-3**);
- (b) paved and fenced off; 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 (**Plans A-2** and **A-3**):

- (a) predominantly open storage/storage yards intermixed with warehouses, vehicle repair workshops, parking of vehicles, scattered residential structures, agricultural land, grassland, orchards and vacant land/structures;
- (b) there are scattered residential structures in the vicinity of the Site with the nearest one located about 10m to the west;
- (c) about 15m to its east is a nullah flanked by Lam Tai East Road and Lam Tai West Road;
- (d) four open storage yards with/without ancillary site office and workshop and one vehicle repair workshop are located to the west, southwest and northeast of the Site, which are operating with valid planning permissions under applications No. A/YL-TYST/835, 919, 931, 946 and 826 respectively; and
- (e) except for the aforementioned operations operating under valid permissions, the remaining open storage/storage yards, warehouses and parking of vehicles in the vicinity of the Site are suspected unauthorised development (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, Lot 1415 RP in D.D. 119 is currently covered by Short Term Waiver (STW) No. 4592 which permits structure(s) erected thereon for the purpose of ‘Temporary Warehouse for Storage of Brand New Electronic Goods’. Lot 1416 RP and the GL in D.D. 119 are covered by STW No. 3635 and Short Term Tenancy (STT) No. 2641 respectively, which permit structure(s) erected thereon for the purpose of ‘Open Storage of Metal Ware and Plastic Goods including Containers and Road Signs’.
- (c) The Site is accessible from Shan Ha Road via GL and private land. Her office does not provide maintenance work for the GL involved and does not guarantee any right-of-way over the GL 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 application, the STW/STT holder(s) will need to apply to her office for modification of the STW/STT conditions if there is any irregularities on site 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. No construction of New Territories Exempted Building(s) will be considered or allowed. 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 premium 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 Shan Ha Road should be checked with the lands authority.
- (b) The management and maintenance responsibilities of the access road/path/track should 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 vehicle queuing and no 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 Shan Ha Road.

Environment

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

- (a) There was no environmental complaint concerning the Site received in the past 3 years.
- (b) Should the application be approved, the applicant should be advised to follow the relevant mitigation measures and requirements in the latest Code of Practice to minimise any potential environmental nuisances.

Drainage

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

- (a) In view of the public comment (**Appendix IV-2**), the applicant is requested to submit a revised drainage proposal to address the comment on flooding issue.
- (b) Despite the above, he has no objection in principle to the proposed development from the public drainage point of view. Should the Board consider the application acceptable from the planning point of view, approval conditions requiring (i) the submission of a revised drainage proposal and (ii) the

implementation and maintenance of the proposed facilities for the development to the satisfaction of the Director of Drainage Services or of the Board should be stipulated.

Fire Safety

9.1.6 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. 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) 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

9.1.7 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 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 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, demolition 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 Authorised Person should be appointed as the co-ordinator for the proposed building works in accordance with 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.

Electricity Supply

9.1.8 Comments of the Director of Electrical and Mechanical Services (DEMS):

- (a) He has no particular 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, organising 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.

Others

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 Recommended Outline

Development Plan (RODP) of YLS promulgated on 8.8.2017, the Site falls within an area zoned as “Special Residential – Public Rental Housing (with Commercial)” (“RSc”) and 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 (New Territories West), CEDD (PM(NTW), CEDD):

- (a) He has no objection to the subject application.
- (b) However, the Site falls within the project boundary of the proposed YLS Development – Stage 2. The YLS Development would provide land to meet the medium to long term housing needs of Hong Kong. The applicant shall be reminded that extension of the planning permission may not be supported in future when the detailed implementation programme of works in the Site under YLS Development – Stage 2 is formulated.

District Officer’s Comments

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

His office has not received any feedback from locals.

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

- (a) Director of Agriculture, Fisheries and Conservation (DAFC);
- (b) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and
- (c) Commissioner of Police (C of P).

10. Public Comments Received During the Statutory Publication Period

On 11.6.2019, the application was published for public inspection. During the first three weeks of the statutory public inspection period, which ended on 2.7.2019, two comments were received. The first comment from a village representative of Shan Ha Tsuen (**Appendix IV-1**) raised objections to the proposed development as it would hinder the land resumption programme of the YLS Development; the proposed development will exhaust the local track connecting the Site and generate adverse traffic impact; and the proposed use may generate environmental nuisances. The remaining comment from a

member of the public (**Appendix IV-2**) raised concerns that the proposed development would generate adverse traffic, drainage and environmental impacts.

11. Planning Considerations and Assessments

- 11.1 The subject application is for temporary warehouse for storage of stage equipment for a period of 3 years at a site zoned “U” on the OZP. The applied use is not in conflict with the planning intention of the “U” zone which is generally 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. While the Site falls within an area zoned as “RSc” and an area shown as ‘Road’ on the RODP of YLS promulgated on 8.8.2017, CE/CID, PlanD does not raise objection to the application and PM(W), CEDD has no objection to the proposed temporary use for 3 years. As such, 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 mainly open storage/storage yards intermixed with warehouses, vehicle repair workshops, and parking of vehicles, etc. (**Plan A-2**). Although there are scattered residential structures nearby, 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. Besides, there has been no environmental complaint concerning the Site received in the past 3 years. To address public concerns and 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 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 Code of Practice in order to minimise any potential environmental impact on the surrounding area.
- 11.4 Given that two previous approvals for similar warehouse uses have been granted to the Site and 45 similar applications have been approved in this part of the “U” zone since the promulgation of TPB PG-No. 13E, approval of the current application is in line with the Committee’s previous decisions.
- 11.5 Two public comments were received on the application during the statutory publication period as summarised in paragraph 10. The planning considerations and assessments in paragraphs 11.1 to 11.4 above are relevant.

12. Planning Department’s Views

- 12.1 Based on the assessments made in paragraph 11 and having taken into account the public comments as mentioned in paragraph 10, the Planning Department considers that the temporary warehouse for storage of stage equipment 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 2.8.2022. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval conditions

- (a) no operation between 7:00 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 medium or heavy goods vehicles exceeding 5.5 tonnes, including container tractor/trailers, as defined in the Road Traffic Ordinance are allowed to be parked/stored on or enter/exit the Site, as proposed by the applicant, 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) no open storage, repairing, dismantling, spraying, cleaning or other workshop activities, and handling of used electrical appliances, computer/electronic parts (including cathode-ray tubes) and electronic waste, as proposed by the applicant, are allowed on the Site at any time 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) all existing trees within the Site shall be maintained at all times during the planning approval period;
- (h) the submission of a revised 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 2.2.2020;
- (i) in relation to (h) 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 2.5.2020;
- (j) in relation to (i) above, the implemented drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (k) the submission of 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 2.2.2020;
- (l) in relation to (k) above, the implementation of 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 2.5.2020;

- (m) if any of the above planning conditions (a), (b), (c), (d), (e), (f), (g) or (j) 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 (h), (i), (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 V**.

12.3 There is no strong reason to recommend rejection of the application.

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 3.6.2019
Appendix Ia	Supplementary Planning Statement
Appendix Ib	Supplementary Information received on 3.6.2019 providing updated executive summary
Appendix Ic	Supplementary Information received on 10.6.2019 providing clarification on the site area
Appendix Id	Further Information received on 25.7.2019 clarifying the operation hours
Appendix II	Previous Applications covering the Site
Appendix III	Similar Applications in this Part of the “U” Zone on the OZP since the promulgation of TPB PG-No. 13E
Appendices IV-1 to IV-2	Public comments received during the statutory publication periods

Appendix V	Recommended Advisory Clauses
Drawing A-1	Location Plan with Vehicular Access
Drawing A-2	Proposed Layout Plan
Drawing A-3	Proposed Landscape and Tree Preservation Plan
Drawing A-4	Proposed Drainage Plan
Plan A-1a	Location Plan with Similar Applications
Plan A-1b	Previous Applications Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4a and A-4b	Site Photos

**PLANNING DEPARTMENT
AUGUST 2019**