
SECTION 16 PLANNING APPLICATION

**PROPOSED TEMPORARY WAREHOUSE (EXCLUDING DANGEROUS GOODS GODOWN)
WITH ANCILLARY FACILITIES AND ASSOCIATED FILLING OF LAND
FOR A PERIOD OF 3 YEARS IN “AGRICULTURE” ZONE,
VARIOUS LOTS IN D.D. 90, MAN KAM TO, NEW TERRITORIES**

PLANNING STATEMENT

Applicant

Wah Cheong Hon Building Materials Limited

Consultancy Team

R-riches Planning Limited

FILE CONTROL

FILE NAME : *DD90 Lot 535 & VL - Planning Statement (20260526) Ver1.0*

FILE LOCATION : *\\R-SERVER\Planning\Planning Application\DD90 Lot 535 & VL - Warehouse in MKT (NDA)\Submission (May 26)\Planning Statement*

REVISION NO. : *1.0*

APPLICANT : *Wah Cheong Hon Building Materials Limited*

TYPE OF APPLICATION : *S.16 Planning Application*

PROPOSED USE : *Proposed Temporary Warehouse (excl. D.G.G.) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years*

SITE LOCATION : *Various Lots in D.D. 90, Man Kam To, New Territories*

AMENDMENT RECORD

REVISION NO.	DESCRIPTION	APPROVED BY (Date)	PREPARED BY (Date)
1.0	Final Report	MN (20260528)	LT (20260528)

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EXECUTIVE SUMMARY

- The applicant seeks planning permission from the Town Planning Board (the Board) under Section (S.) 16 of the Town Planning Ordinance (Cap. 131) to use *Lots 535 (Part), 536 (Part), 538 S.A (Part), 538 RP (Part) and 551 RP (Part) in D. D. 90, Man Kam To, New Territories* (the Site) for '**Proposed Temporary Warehouse (excluding Dangerous Goods Godown (excl. D.G.G.)) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years**' (the proposed development).
- The Site falls within an area zoned "Agriculture" ("AGR") on the Approved Man Kam To Outline Zoning Plan (OZP) No. S/NE-MKT/7. The Site occupies an area of 2,756 m² (about). 1 single-storey temporary structure is proposed at the Site for warehouse (excl. D.G.G.) with ancillary office and meter room uses with total gross floor area (GFA) of 2,258 m² (about). The remaining area is reserved for area for vehicle parking spaces and circulation area.
- The Site is accessible from Lin Ma Hang Road via a local access. The operation hours of the proposed development are Monday to Saturday from 09:00 to 19:00. No operation on Sunday and public holidays.
- Justifications for the proposed development are as follows:
 - the affected business operator's premises (the Original Premises) is affected by Government's land resumption for the development of the San Tin Technopole (STT);
 - the applicant has spent effort in identifying suitable sites for relocation;
 - the applied use is similar to the affected business premises;
 - the proposed development is considered not incompatible with surrounding land uses; and
 - the proposed development is only on a temporary basis, approval of the application will not frustrate the long-term planning intention of the "AGR" zone.
- Details of development parameters are as follows:

Site Area	2,756 m ² (about)
Covered Area	2,258 m ² (about)
Uncovered Area	498 m ² (about)
Plot Ratio	0.82 (about)
Site Coverage	82% (about)
No. of Structure	1
Total GFA	2,258 m ² (about)
- Domestic GFA	Not applicable
- Non-Domestic GFA	2,258 m ² (about)
Building Height	8 m (about)
No. of Storey	1

行政摘要（內文如與英文版本有任何差異，應以英文版本為準）

- 申請人現根據《城市規劃條例》（第 131 章）第 16 條，向城市規劃委員會提交有關新界文錦渡丈量約份第 90 約地段第 535 號（部分）、第 536 號（部分）、第 538 號 A 分段（部分）、第 538 號餘段（部分）及第 551 號餘段（部分）的規劃申請，於上述地點作「**擬議臨時貨倉（危險品倉庫除外）連附屬設施和相關填土工程（為期 3 年）**」（擬議發展）。
- 申請地點所在的地區在《文錦渡分區計劃大綱核准圖編號 S/NE-MKT/7》上劃為「農業」地帶。申請地盤面積為 2,756 平方米（約）。申請地點將設 1 座單層臨時構築物作貨倉（危險品倉庫除外）連附屬辦公室及電錶房用途，總樓面面積合共為 2,258 平方米（約），申請地點的其餘地方將預留作車輛停泊及流轉空間。
- 申請地點可從蓮麻坑路經一條地區道路前往。擬議發展的作業時間為星期一至六上午九時至下午七時，星期日及公眾假期休息。
- 擬議發展的申請理據如下：
 - 在地經營者原來的經營處所受到政府的「新田科技城」發展收地影響；
 - 申請人曾經致力尋找合適的搬遷地點；
 - 申請用途與受影響的經營處所用途相同；
 - 擬議發展與周邊地方的用途並非不協調；及
 - 擬議發展只屬臨時性質，批出規劃許可不會影響「農業」地帶的長遠規劃意向。
- 擬議發展的詳情發展參數如下：

申請地盤面積：	2,756 平方米（約）
上蓋總面積：	2,258 平方米（約）
露天地方面積：	498 平方米（約）
地積比率：	0.82（約）
上蓋覆蓋率：	82%（約）
樓宇數目：	1 座
總樓面面積	2,258 平方米（約）
住用總樓面面積：	不適用
非住用總樓面面積：	2,258 平方米（約）
構築物高度：	8 米（約）
構築物層數：	1 層

1. INTRODUCTION

Background

- 1.1 **R-riches Planning Limited** has been commissioned by **Wah Cheong Hon Building Materials Limited** (the applicant) to make submission on their behalf to the Board under S.16 of the Ordinance in respect to *Lots 535 (Part), 536 (Part), 538 S.A (Part), 538 RP (Part) and 551 RP (Part) in D.D. 90, Man Kam To, New Territories (Plans 1 to 3)*.
- 1.2 The applicant would like to use the Site for '**Proposed Temporary Warehouse (excl. D.G.G.) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years**'. The Site falls within an area zoned "AGR" on the Approved Man Kam To OZP No. S/NE-MKT/7 (**Plan 2**). According to the Notes of the OZP, the applied use is neither Columns 1 nor 2 use within the "AGR" zone, which requires planning permission from the Board.
- 1.3 In support of the proposal, a set of indicative development plans/drawings (**Plans 1 to 10**), and supplementary information (**Appendices I and II**) are provided with the Planning Statement. Other assessments will be submitted, if required, at a later stage for the consideration of relevant government bureaux/departments and members of the Board.

2. JUSTIFICATIONS

To facilitate the relocation of the Original Premises affected by the development of STT

- 2.1 The current application is intended to facilitate the relocation of the business operators' premises in San Tin due to land resumption and to pave way for the development of STT (**Appendix I** and **Plan 4**). The Original Premises (*i.e. formerly Lot 287 in D.D. 98*) currently falls within an area zoned "Other Specified Uses" annotated "Innovation and Technology" ("OU(I&T)") on the Approved San Tin Technopole OZP No. S/STT/2 (**Plan 4**).
- 2.2 With reference to the implementation programme, the Original Premises falls within the land resumption limit for the Phase Two Development of the STT (**Appendix I** and **Plan 5**). As the Original Premises will be resumed and reverted to the Government in the future, the applicant desperately needs to identify a suitable site for the relocation of the affected business operators in order to continue the business operation.

Applicant's effort in identifying suitable site for relocation

- 2.3 Whilst the applicant has spent effort to relocate the Original Premises to a number of alternative sites in the New Territories, those sites were considered not suitable or impracticable due to various issues such as land use incompatibility, environmental concerns, land ownership issue or accessibility (**Appendix II; Plan 6**). Following a comprehensive site-searching process, the Site has been identified for relocation due to the relatively flat topography, extensive uncovered area and not incompatible to surrounding land uses

Applied use is similar to the Original Premises

- 2.4 The proposed development involves a warehouse for storage of miscellaneous goods with ancillary site office and meter room to support the daily operation of the Site, which is similar to the 'warehouse' use of the Original Premises. Compared with the Original Premises in San Tin, the area of the proposed development is slightly larger than the area of the Original Premises, a portion of the Site (*i.e. about 498 m², 18%*) is uncovered and designated for manoeuvring and parking of vehicles, in order to support the daily operation of the Site. According to the applicant, the original premises currently lack adequate circulation space, resulting in prolonged waiting times for vehicles for loading/unloading (L/UL) of goods. Therefore, a substantial amount of circulation space is reserved at the Site in order to increase the Site's overall efficiency, as well as to minimize the potential adverse traffic impact to the surrounding road network. Details of the difference between the affected premises and the Site are shown at **Table 1** below:

Table 1 - Difference between the Original Premises and the Site

Tenant	Original Premises (a)	The Site (b)	Difference (b) – (a)
Site Area	1,742 m ²	2,756 m ²	+1,014 m ² , +58%

Approval of the application would not frustrate the long-term planning intention of the "AGR" zone

- 2.5 Although the Site situates in an area zoned "AGR" on the Approved Man Kam To OZP No. S/NE-MKT/7, the Site is currently vacant, abandoned and without active agricultural activities. Therefore, approval of the current application on a temporary basis would not frustrate the long-term planning intention of the "AGR" zone and would better utilise deserted land in the New Territories.
- 2.6 Despite the fact that the proposed development is not in line with the planning intention of the "AGR" zone, the special background of the application should be considered on its individual merit, of which the approval of the current application would therefore not set an undesirable precedent for the "AGR" zone.

The proposed development is not incompatible with surrounding land uses

- 2.7 The surrounding areas of the Site are considered to be in semi-rural character and are predominantly occupied by storage/open storage yards, temporary structures for logistics centre and residential dwellings intermixed with vacant lands and ponds. The proposed development is considered not incompatible with surrounding land uses. Upon approval of the current application, the applicant will make effort in complying with approval conditions in relation to fire services and drainage aspects, so as to minimise potential adverse impacts arising from the proposed development.

3. SITE CONTEXT

Site Location

- 3.1 The Site is in close vicinity of the Lin Ma Hang Road. It is located approximately 120 m north of the Lin Ma Hang Road; 400 m (about) northeast of the Man Kam To Boundary Control Point (BCP); 6.4 km (about) northeast from the Original Premises and 2.2 km (about) southwest of the Heung Yuen Wai BCP.

Accessibility

- 3.2 The Site is accessible from Lin Ma Hang Road via a local access (**Plan 1**).

Existing Site Condition

- 3.3 The Site is generally flat and partially covered with overgrown grass and vegetation (**Plans 1, 3 and 7**).

Surrounding Area

- 3.4 The Site is surrounded by temporary structures for warehouses, logistics centre, vacant/unused land covered by vegetation and some village houses (**Plans 1, 3 and 7**).
- 3.5 To its immediate north are vacant/unused land covered with vegetation. To its further north is the village proper of Muk Wu Tsuen.
- 3.6 To its further east are some temporary structures for warehouses use. To its further east across Lin Ma Hang Road are some temporary structures for warehouses and logistics centre uses.
- 3.7 To its immediate south are vacant/unused lands covered with vegetation. To its further south across the Lin Ma Hang Road is the application site for an approved application (No. A/NE-MKT/35) for 'warehouse' use.
- 3.8 To its immediate and further west are vacant lands covered by vegetations and woodland.

4. PLANNING CONTEXT

Zoning

- 4.1 The Site falls within an area zoned "AGR" on the Approved Man Kam To OZP No. S/NE-MKT/7 (**Plan 2**). According to the Notes of the OZP, the applied use is neither Columns 1 nor 2 use within the "AGR" zone, which requires planning permission from the Board.

Planning Intention

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

Restriction on Filling of Land

- 4.3 According to the Remarks of the subject "AGR" zone, *any filling of land, including that to effect a change of use to any of those specified in Columns 1 and 2 above or the uses or developments always permitted under the covering Notes (except public works co-ordinated or implemented by Government, and maintenance, repair or rebuilding works), shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft development permission area plan without the permission from the Board under S.16 of the Ordinance.*
- 4.4 Although the proposed development is not in line with planning intention of the "AGR" zone, the special background of the application should be considered on individual merit. Approval of the application on a temporary basis would not frustrate the long term planning intention of the "AGR" zone. Upon approval of the planning application, the applicant will make effort in complying with approval conditions related to fire service and drainage aspects, to minimize potential adverse impact arisen from the proposed development.

Previous Application

- 4.5 There is no previously approved application in respect of the Site.

Similar Application

- 4.6 Several similar S.16 planning applications for 'warehouse' use within the same "AGR" zone were approved by the Board in the past 5 years. Within which application No. A/NE-MKT/35, with a site area of about 20,512.5m², which was approved by the Board with on a temporary basis of 3 years in 2024.

Land Status

- 4.7 The Site comprises 5 private lots, i.e. *Lots 535 (Part), 536 (Part), 538 S.A (Part), 538 RP (Part) and 551 RP (Part) in D.D. 90*, with private land area of 2,756 m² (about) Old Schedule Lot held under Block Government Lease (**Plan 3**). .
- 4.8 Given that there is restriction on the erection of structure without prior approval from the Government, the applicant will liaise with the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD) for the Short Term waiver (STW) application to make way for the erection of the proposed structures at the Site, after planning approval has been obtained from the Board. No structure is proposed for domestic use.

5. DEVELOPMENT PROPOSAL

Development Details

- 5.1 The Site consists of an area of 2,756 m² (about). Details of the development parameters are shown at **Table 2** below.

Table 2 - Development Parameters

Site Area	2,756 m ² (about)
Covered Area	2,256 m ² (about)
Uncovered Area	498 m ² (about)
Plot Ratio	0.82 (about)
Site Coverage	82% (about)
No. of Structure	1
Total GFA	2,258 m ² (about)
- Domestic GFA	Not applicable
- Non-Domestic GFA	2,258 m ² (about)
Building Height	8 m (about)
No. of Storey	1

- 5.2 1 single-storey temporary structure is proposed at the Site for warehouse (excl. D.G.G.) with ancillary site office and meter room with total GFA of 2,258 m² (about). The remaining open area is reserved for vehicle parking spaces and circulation area (**Plan 8**). Details of the proposed structure are shown at **Table 3** below.

Table 3 – Details of the Proposed Structure

Structure	Uses	Covered Area	GFA	Building Height
B1	Warehouse (excl. D.G.G.), Office and Meter Room	2,258 m ² (about)	2,258 m ² (about)	8 m (about) (1-storey)
Total		2,258 m² (about)	2,258 m² (about)	-

Filling of Land at the Site

- 5.3 The existing site level is +7.1 mPD (about). The entire Site is proposed to be hard-paved with concrete of not more than 0.2 m in depth to provide a relatively flat and solid surface for site formation of structures, and vehicle parking spaces and circulation area. Upon completion of the filling, the site level will be increased to +7.3 mPD (**Plan 9**). The hard-paving is considered necessary and has been kept to a minimum to meet the operational need of the proposed development. No further filling of land beyond the

approved scheme will be carried out by the applicant. Upon expiry of the planning permission, the applicant will reinstate the Site into an amenity area.

Operation Mode

- 5.4 The proposed development involves the operation of warehouse for storage of miscellaneous goods with ancillary facilities to support the daily operation of the Site. The miscellaneous goods, including but not limited to construction materials, construction machinery, used electrical/electronic appliances and scrap metal etc., will be stored with the proposed enclosed structures. The operation hours of the proposed development are Monday to Saturday from 09:00 to 19:00. There is no operation on Sunday and public holidays. No dangerous goods will be allowed to be stored within the Site.
- 5.5 It is estimated that the Site would be able to accommodate about 5 nos. of staff. The site office is intended to provide indoor workspace for administrative staff to support the daily operation of the Site. As no shopfront is proposed at the Site, visitor is not anticipated.

Minimal Traffic Impact

- 5.6 The Site is accessible from Lin Ma Hang Road via a local access (**Plan 1**). An 9 m-wide (about) vehicular ingress/egress is proposed at the western periphery of the Site. A total of 4 parking and L/UL spaces will be provided at the Site (**Plan 8**). Details of the parking and L/UL provision are shown at **Table 4** below.

Table 4 – Provision of Parking and L/UL Spaces

Type of Parking Space	No. of Space
Parking spaces for private car (PC) - 2.5 m (W) x 5 m (L)	2
Type of L/UL Space	No. of Space
L/UL Spaces for light goods vehicle (LGV) - 3.5 m (W) x 7 m (L)	2

- 5.7 Parking spaces are reserved solely for staff use. LGV will be deployed for the transportation of materials into and out of the Site, which will only be conducted beyond peak hours between 10:00 and 18:00. Staff will be deployed to station at the ingress/egress of the Site to direct incoming/outgoing vehicles to enhance pedestrian safety. Sufficient space is provided for vehicle to manoeuvre smoothly within the Site to ensure that no vehicle will be allowed to queue back to or reverse onto/from the Site to the public road (**Plan 10**). The breakdown of the estimated trip generation/attraction are provided at **Table 5** below:

Table 5 – Estimated Trip Generation/Attraction

Time Period	Estimated Trip Generation/Attraction				
	PC		LGV		2-Way Total
	In	Out	In	Out	
Trips at <u>AM peak</u> per hour (09:00 – 10:00)	2	0	0	0	2
Trips at <u>PM peak</u> per hour (18:00 – 19:00)	0	2	0	0	2
Average trips per hour (10:00 – 18:00)	0	0	1	1	2

- 5.8 As the nos. of vehicular trip generated/attracted are expected to be minimal, adverse traffic impact to the surrounding road network should not be anticipated. No vehicle without valid licenses issued under the *Road Traffic (Registration and Licensing of Vehicles) Regulations* are allowed to be parked/stored at the Site at any time during the planning approval period.

Minimal Environmental Impact

- 5.9 The applicant will strictly follow the latest 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites' issued by the Environmental Protection Department (EPD) to minimise adverse environmental impacts and nuisance to the surrounding areas. The applicant will also comply with all environmental protection/pollution control ordinances, i.e. *Water Pollution Control Ordinance*, *Air Pollution Control Ordinance*, *Noise Control Ordinance* etc. at all times during the planning approval period.
- 5.10 During the construction stage, the applicant will follow the good practices stated in *Professional Persons Environmental Consultative Committee Practice Notes (ProPECC PN) 2/24* to minimise the impact on the nearby watercourse water quality. Surface run-off from the construction phase will be discharged into storm drains through appropriately designed sand/silt removal facilities such as sand traps, silt traps, and sediment basins. Silt removal facilities, channels, and manholes will be maintained, and the deposited silt and grit will be removed on a regular basis, at the start and end of each rain season, to ensure that these facilities are always operational.
- 5.11 During the operation of the proposed development, the major source of wastewater will be sewage from the washroom generated by staff. The applicant will implement good practices under *ProPECC PN 1/23* when designing on-site sewage system within the Site. 2.5 m-high (about) solid metal fencing will be erected along the site boundary to minimise noise nuisance to the surrounding area. The boundary wall will be installed properly by a licensed contractor to prevent misalignment of walls, to ensure that there is no gap or slit on the boundary wall. In addition, maintenance will be conducted on a regular basis.

Minimal Landscape Impact

- 5.12 The Site is currently vacant. Due to the proposed filling of land and provision of vehicle parking, L/UL and circulation spaces, the majority of the Site will be disturbed. As such, it is not proposed to retain any of the existing vegetation at the Site.

Minimal Drainage Impact

- 5.13 The applicant will submit a drainage proposal to mitigate potential drainage impact generated from the proposed development after planning permission has been granted from the Board. The applicant will implement the proposed drainage facilities at the Site once the drainage proposal is accepted by the Drainage Authority.

Fire Safety Aspect

- 5.14 The applicant will submit a fire service installations (FSIs) proposal for the consideration of the Director of Fire Services to enhance fire safety of the Site after planning permission has been granted from the Board. Upon receiving relevant STW approval from the LandsD for erection of the proposed structure, the applicant will implement the accepted FSIs proposal at the Site.

6. CONCLUSION

- 6.1 The current application is intended to facilitate the relocation of the affected operator's business in San Tin, which will be affected by the development of STT (**Appendix I; Plans 4 and 5**). Whilst the affected business operator has attempted to relocate the Original Premise to a number of alternative sites in the New Territories, those sites were considered not suitable or impracticable (**Appendix II; Plan 6**). Given that the relocation is to facilitate the STT development, approval of the application can facilitate relocation prior to land resumption, thereby minimise the impact on the implementation programme of government development projects.
- 6.2 Although the Site is not in line with the long-term planning intention of the "AGR" zone, the Site is currently vacant, abandoned and without active agricultural activities. Hence, approval of the application on a temporary basis for a period of 3 years would not frustrate the long-term planning intention of the "AGR" zone and better utilise deserted land in the New Territories. Similar application for 'warehouse' use on a larger scale has been previously approved by the Board in 2025. Hence, approval of the current application would not set an undesirable precedent.
- 6.3 The Site is mainly surrounded by temporary structures for warehouses, logistics centres and vacant/unused land covered by vegetation. The proposed development is considered not incompatible with the surrounding areas. Given that the current application is intended to facilitate the relocation of affected business premises operator and the special background of the application should be considered on its individual merit, hence, approval of the current application would not set an undesirable precedent within the "AGR" zone.
- 6.4 The proposed development will not create significant nuisance to the surrounding areas. Adequate mitigation measures will be provided, i.e. submission of drainage proposal, FSIs proposals etc., to mitigate any adverse impact that would have arisen from the proposed development upon obtaining relevant planning permission from the Board. The applicant will also strictly follow the latest 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites' and relevant Practice Notes and guidelines issued by EPD to minimise all possible environmental impacts on nearby sensitive receivers.
- 6.5 In view of the above, the Board is hereby respectfully recommended to approve the subject application for '**Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years**'.

R-riches Planning Limited

May 2026