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Section 16 Planning Application

Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years at Lots 181 RP (Part), 184 S.A. RP, 185, 186, 188 RP, 191 RP, 192 S.A. RP, 193 RP, 194 RP and 195 S.A RP in D.D. 82, Lin Ma Hang Road, Ta Kwu Ling, N.T.

Planning Statement

Applicant
Wong Kee Engineering Limited (黃記工程有限公司)

Prepared by
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July 2026

Executive Summary

This planning statement is submitted to the Town Planning Board (the “Board”) in support of a planning application for proposed temporary warehouse (excluding dangerous goods godown) with ancillary facilities for a period of 3 years at Lots 181 RP(Part), 184 S.A. RP, 185, 186, 188 RP, 191 RP, 192 S.A. RP, 193 RP, 194 RP and 195 S.A RP in D.D. 82, Lin Ma Hang Road, Ta Kwu Ling, N.T. (“the Application Site”).

The Application Site, covering an area of about 3,906 sq.m., falls within an area zoned “Recreation” (“REC”) on the Approved Man Kam To Outline Zoning Plan (OZP) No. S/NE-MKT/7 gazetted on 7.11.2025. According to the Notes of the OZP, ‘Warehouse (excluding Dangerous Goods Godown)’ is neither Column 1 nor Column 2 use of the “REC” zone, and temporary use or development of any land or building not exceeding a period of three years requires planning permission from the Board.

The aim of this application is to facilitate the relocation of the warehouse operated by the Applicant’s represented operator, which has been affected by the government’s land resumption for the Second Phase of the Hung Shui Kiu/Ha Tsuen New Development Area project. The affected site in Ha Tsuen has been resumed and reverted to the Government. As the operator requires a large site for storing construction materials and miscellaneous goods, it has become necessary to relocate the operation. Following a site search, the Applicant considers the Application Site suitable for establishing a warehouse, thereby enabling the business to continue operating.

The Application Site is flat and currently vacant. A 2-storey temporary warehouse (BH: about 13m) is proposed at the northwest portion of the site for storage of construction materials and miscellaneous goods. Ancillary facilities will also be provided at the northern and southern portions of the site, including a 2-storey ancillary office (floor area: about 30 sq.m.; BH: 5m), a washroom (floor area: about 6 sq.m.; BH: 2.5m), and a meter room (floor area: about 6 sq.m.; BH: 2.5m).

An 8m-wide vehicular ingress and egress point will be constructed on the north-east side of the Application Site, connecting to Lin Ma Hang Road. The proposed development will provide 3 loading/unloading spaces (3.5m x 11m) for medium goods vehicles and 3 private car parking spaces for staff/visitors (2.5m x 5m). The operation hours of the Application Site are 8:00 am to 7:00 pm, Mondays to Saturdays. There will be no operation on Sundays and public holidays. To minimize potential noise and environmental impacts to the surrounding area, no open storage and workshop activities will be carried out within the Application Site.

The justifications of this application are:

1. The proposed development is in line with the future planning intention of Northern Metropolis;
2. The Application Site meets the relocation need of the Applicant;
3. The proposed development does not contravene the planning intention of “REC” zone;
4. Similar applications have been approved within the same “REC” zone;
5. The proposed development allows optimization of valuable land uses;
6. The proposed development is considered not incompatible with surrounding areas;
7. The proposed development will not generate adverse traffic, environmental and drainage impacts on the surrounding areas; and
8. The proposed development will not create undesirable precedent.

In view of the justifications as presented in this planning statement, it is hoped that members of the Board and relevant Government departments will approve this application for a period of 3 years.

行政摘要

此規劃報告書向城市規劃委員會（“城規會”）呈交，以支持新界打鼓嶺蓮麻坑路丈量約份第 82 約地段第 181 號餘段(部分)、第 184 號 A 分段餘段、第 185 號、第 186 號、第 188 號餘段、第 191 號餘段、第 192 號 A 分段餘段、第 193 號餘段、第 194 號餘段及第 195 號 A 分段餘段（“申請地點”），作為期三年的擬議臨時貨倉(危險品倉庫除外)連附屬設施（“擬議發展”）的規劃申請。

申請地點的面積約 3,906 平方米，座落於在 2025 年 11 月 7 日刊憲的文錦渡分區計劃大綱核准圖（“大綱圖”）(圖則編號：S/NE-MKT/7) 上的「康樂」地帶。根據大綱圖註釋，「貨倉(危險品倉庫除外)」並不屬「康樂」地帶內第一欄或第二欄之用途，然而，不超過三年土地或建築物的臨時用途或發展，須先向城規會提出申請。

本申請旨在協助申請人所代表的營運商，將其受政府為洪水橋/厦村新發展區第二期項目而進行的收地行動所影響的貨倉遷往他處。位於厦村的受影響用地已遭收地並歸還政府。由於該營運商需要大片用地來貯存建築材料及各類雜貨，因此必須將營運遷往他處。經物色地點後，申請人認為申請用地適合作為設立貨倉之用，從而使業務得以持續運作。

申請地點現時為平坦的空置土地。擬議發展將於申請地點的西北面設置一座兩層臨時貨倉（建築高度：約 13 米），用作倉庫貯存建築材料及各類雜貨。此外，亦會在申請地點的北部及南部設置附屬設施，包括一座兩層高附屬辦公室（樓面面積：約 30 平方米；建築高度：約 5 米）、一座洗手間（樓面面積：約 6 平方米；建築高度：約 2.5 米），以及一個電錶房（樓面面積：約 6 平方米；建築高度：約 2.5 米）。

擬議發展的出入口將設於東北面，約 8 米闊，連接蓮麻坑路。另外，亦設有 3 個中型貨車上落貨位（3.5 米 x 11 米）及 3 個私家車停車位（2.5 米 x 5 米）供職員/訪客使用。擬議發展的營運時間為星期一至星期六上午 8 時至下午 7 時，星期日及公眾假期不會運作。為減少擬議發展對附近地方的潛在噪音及環境影響，申請地點內不會進行任何露天存放及工場活動。

本規劃申請的理據為：

1. 擬議發展符合北部都會區未來的規劃意向；
2. 申請地點符合申請人的重置需求；
3. 擬議發展不會違反「康樂」地帶的規劃意向；
4. 申請地點座落的「康樂」地帶已有類近的規劃申請獲得批准；
5. 擬議發展可有助於優化寶貴的土地資源；
6. 擬議發展與周邊土地兼容；
7. 擬議發展不會對附近地方構成不良的交通、環境及排水影響；及
8. 擬議發展不會造成不良的先例。

基於本規劃報告書所述的理據，敬希 各城規會委員及有關政府部門能批准此項申請，作為期三年的臨時用途。

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1. Introduction

1.1 Purpose

Pursuant to Section 16 of the Town Planning Ordinance, this Planning Statement Report is submitted to the Town Planning Board (“the Board”) in support of a planning application for proposed temporary warehouse (excluding dangerous goods godown) with ancillary facilities for a period of 3 years (the “proposed development”) at Lots 181 RP (Part), 184 S.A. RP, 185, 186, 188 RP, 191 RP, 192 S.A. RP, 193 RP, 194 RP and 195 S.A. RP in D.D. 82, Lin Ma Hang Road, Ta Kwu Ling, N.T. (hereafter referred to as “the Application Site”). **Figure 1** shows the location of the Application Site and the Lot Index Plan indicating the concerned lots is shown per **Figure 2**.

The application is submitted to facilitate the relocation of the Applicant’s affected operation in Ha Tsuen, Yuen Long by land resumption for the Second Phase Development of Hung Shui Kiu/Ha Tsuen New Development Area (NDA). The Application Site, covering an area of about 3,906 sq.m., falls within an area zoned “Recreation” (“REC”) on the Approved Man Kam To Outline Zoning Plan (OZP) No. S/NE-MKT/7 gazetted on 7.11.2025. According to the Notes of the OZP, ‘Warehouse (excluding Dangerous Goods Godown)’ is neither Column 1 nor Column 2 use of the “REC” zone, and temporary use or development of any land or building not exceeding a period of three years requires planning permission from the Board.

1.2 Background of the Application

Background of the Applicant

Harris International (Asia) Limited (恆益國際(亞洲)有限公司) (the “affected operator”), the party affected by the land resumption, has operated a warehouse in Ha Tsuen, Yuen Long, New Territories (the “affected site”). The affected operator has appointed Wong Kee Engineering Limited as the Applicant for this planning application (hereafter referred to as “the Applicant”) (see **Appendix 1**). Since 2023, the affected operator has been used the site in Ha Tsuen for the storage of construction materials and miscellaneous goods (see the tenancy agreement in **Appendix 2**). The affected site in Ha Tsuen has been resumed and reverted to the Government (see letter from the Lands Department dated 4.9.2025 in **Appendix 3**).

Affected Site	Site Area (sq.m.) (about)	Floor Area (sq.m.) (about)	Use
Lots 1477(Part), 1479RP and 1480RP in D.D.125, Ha Tsuen, Yuen Long, N.T.	2,373	2,742	Warehouse

The operator intends to continue their business and is required to identify a suitable relocation site. Site photos and plans showing its previous operation in Ha Tsuen are provided in **Appendix 4**.

Relocation Need of the Applicant

Due to the continuous resumption of land in the Hung Shui Kiu/Ha Tsuen New Development Area (NDA), the Applicant must relocate their business in order to continue contributing to Hong Kong’s

construction and retail industries. Most importantly, the Applicant must identify a suitable site that can fulfil their operational needs at full capacity. They noted that the land for warehouse use in Categories 1 and 2 of TPB PG-No. 13G either exceeded their budget or was already occupied for open storage or storage purposes.

Taking into account that the Applicant's operations involve considerable land requirements and convenient access between Hong Kong and Mainland China (i.e. a site of a considerable size with an appropriate access road for goods vehicles and in close proximity to a boundary crossing area), the Applicant conducted a thorough site search before identifying the Application Site as the best available relocation option. Most sites were considered unsuitable for various reasons, as detailed below:

	Possible Site Location	Zoning	Reasons for unsuitable for relocation
(a)	DD104, Lot 3056 (Yau Mei San Tsuen, Mai Po, Yuen Long)	"OU (Wetland Conservation Park)"	The proposed use is not in line with the planning intention of "OU (Wetland Conservation Park)" zone.
(b)	DD181, Lots 687S.A - 687S.S (Heung Fan Liu, Sha Tin)	"V"	The proposed use is not in line with the planning intention of the "V" zone, and the Site is far away from boundary crossing area.
(c)	DD82, Lot 202 (Man Kam To, North District)	"AGR"	There is no public road providing vehicular access to the Application Site, and the Site is situated in close proximity to a watercourse.
(d)	DD87, Lot 465 (Hung Lung Hang, North District)	"AGR"	The Site is too small and the access of the Site is too narrow for goods vehicles.
(e)	DD129 Lot 1862 (Lau Fau Shan, Yuen Long)	"REC"	Access to the site is too narrow for goods vehicles, and the Site is subject to future land resumption.

As a result, the Applicant has identified the Application Site as the best available option for a number of reasons.

- (a) The Application Site is directly accessible from Lin Ma Hang Road, located approximately 1.5km southwest of the Heung Yuen Wai Boundary Control Point. This location offers excellent transport infrastructure and connections between Hong Kong and mainland China.
- (b) The recent completion of the road widening works on Lin Ma Hang Road allows large goods vehicles to access the site with ease.
- (c) Vehicular access to the Application Site does not encroach onto any private land, so potential disputes over rights of way can be avoided.
- (d) The Application Site is generally flat and vacant. It can therefore be swiftly transformed into a warehouse for the operator's imminent use.

- (e) The size of the Application Site meets the Applicant's immediate need to accommodate their business operations.

Due to the limited availability of comparable sites on the market, the operator has selected the Application Site for relocation, as its core features align with their operational requirements. The proposed development will also make more efficient use of scarce land resources.

1.3 Organization of the Planning Statement

This planning statement is divided into 6 chapters. Chapter 1 is an introduction outlining the above background of the planning application. Chapter 2 will then illustrate the site context and land status followed by Chapter 3 which describes the planning context in details. Chapter 4 gives the particulars of the proposed development. Detailed accounts of planning justifications of the proposed development are presented in Chapter 5. The planning statement finally concludes with a summary in Chapter 6.

2. Site Context

2.1 The Application Site and Its Existing Condition

The Application Site covers an area of approximately 3,906 sq.m. and is located abutting Lin Ma Hang Road in Man Kam To, New Territories (see **Figure 1**). The Application Site is generally flat and vacant, and partly covered with wild grasses and vegetation. Some temporary structures (containers) erected by the previous occupier can be found on the Application Site (see **Site Photos**) and will be removed by the Applicant.

2.2 Surrounding Land Uses

The surrounding area of the Application Site is rural in nature comprising open storage yards, logistics centres, active/fallow agriculture land, and some scattered temporary structures. Lin Ma Hang Road is located to the north of the Application Site. To the east, on the other side of a local road, is the site covered with valid planning permission (Application No. A/NE-MKT/58) for a temporary logistics centre with ancillary facilities. To the north, across the Lin Ma Hang Road, is an open storage of construction materials and construction machinery with ancillary facilities covered with valid planning permission (Application No. A/NE-MKT/54). To the south lies the Ping Yuen River.

2.3 Accessibility

The Application Site can be accessed directly from Lin Ma Hang Road. The entrance to the Application Site is located to the northeast and is about 8m wide. A plan showing the vehicular access to the Application Site is provided at **Figure 3**.

2.4 Land Status

According to the records of Land Registry, the subject lots are held under Block Government Lease and demised for agricultural use with a lease term for 75 years, commenced from 1.7.1898, and are renewable for a further term of 24 years.

The Applicant will apply for a Short Term Waiver (STW) for the proposed structures to the Lands Department upon obtaining planning approval for this application.

3. Planning Context

3.1 Outline Zoning Plan

The Application Site falls within an area zoned "Recreation" ("REC") on the Approved Man Kam To Outline Zoning Plan (OZP) No. S/NE-MKT/7 gazetted on 7.11.2025 (see **Figure 1**).

The planning intention of "REC" zone is primarily for recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the recreational developments may be permitted subject to planning permission.

According to the Notes of the OZP, temporary use or development of any land or building not exceeding a period of three years requires planning permission from the Board.

3.2 Previous Application

The Application Site is not involved in any previous planning application.

3.3 Similar Applications within the Same "REC" Zone

There are three similar applications approved for temporary warehouses within the same "REC" zone in the vicinity of the Application Site in 2025. These approved applications are summarized as below:

Application No.	Applied Use	Site Area (m ²)	Decision (Date of Approval)
A/NE-MKT/48	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years	1,430	Approved with Conditions (15.8.2025)
A/NE-MKT/43	Proposed Temporary Warehouse for Storage of Vehicle Parts for a Period of 3 Years	650	Approved with Conditions (11.4.2025)
A/NE-MKT/42	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years	5,424	Approved with Conditions (28.3.2025)

4. Development Proposal

4.1 Site Configuration and Layout

The Applicant seeks planning permission to use the Application Site for a proposed temporary warehouse (excluding dangerous goods godown) with ancillary facilities for a period of 3 years. The proposed development will facilitate the relocation and continuation of the operator's business, which has been affected by the second phase development of the Hung Shui Kiu/Ha Tsuen NDA project.

The Application Site covers an area of approximately 3,906 sq.m. A two-storey temporary structure with a gross floor area (GFA) of 3,054 sq.m. for warehouse use is proposed in the northwest of the Application Site. Ancillary facilities, including a site office, washroom and meter room, will also be provided (see Layout Plan at **Figure 4**).

The key development parameters of the application are shown below:-

Applied Use	Proposed temporary warehouse (excluding dangerous goods godown) with ancillary facilities for a period of 3 years
Site Area	About 3,906 sq.m.
Total Floor Area (Non-domestic)	About 3,096 sq.m.
No. of Structures	4 - 1 proposed warehouse - 1 proposed ancillary office - 1 proposed washroom - 1 proposed meter room
Height of Structures	About 2.5 - 13m (1-2 storeys) - proposed warehouse: 13m (2 storeys) - proposed ancillary office: 5m (2 storeys) - proposed washroom: 2.5m (1 storey) - proposed meter room: 2.5m (1 storey)
No. of Parking Spaces	3 nos. (private cars for staff/visitors) (2.5m x 5m)
Loading/unloading Spaces	3 nos. (for medium goods vehicles) (3.5m x 11m)

4.2 Site Operations

The operation hours of the Application Site are 8:00am to 7:00pm, Mondays to Saturdays. The Application Site will not operate on Sundays or public holidays. The main use of the site will be a warehouse for storage of construction materials and miscellaneous goods (excluding dangerous goods), including cosmetics, personal care products and household products. To minimize potential noise and environmental impacts on the surrounding area, open storage and workshop activities will not be permitted on the site.

4.3 Vehicular Access and Parking Arrangement

An 8m-wide vehicular ingress and egress point will be constructed on the north-east side of the

Application Site, connecting to Lin Ma Hang Road. The Applicant will construct the run-in/run-out in accordance with the latest versions of Highways Department's standard drawings Nos. H1113 and H1114 (see **Appendix 5**). The Applicant will provide 3 loading/unloading spaces (3.5m x 11m) for medium goods vehicles and 3 private car parking spaces (2.5m x 5m) for staff/visitors. The remaining open areas are reserved for vehicle manoeuvring.

Left-in and left-out access for vehicles to and from the site is proposed. A swept path and sight line analysis (see **Appendix 5**) has been prepared to demonstrate the satisfactory vehicle manoeuvring when entering and exiting the Application Site, and when manoeuvring within the Application Site. There will be no issues with internal traffic circulation, as sufficient space for manoeuvring vehicles has been reserved in the eastern part of the site. This means that vehicles will never need to wait or queue along Lin Ma Hang Road.

To ensure that there is no queuing of vehicles outside the Application Site and to guarantee pedestrian safety, the Applicant will also implement the following traffic management measures:

- (i) Prior appointments will be arranged for the goods vehicles to deliver the storage materials;
- (ii) Goods vehicles entering the site will be directed to the loading/unloading spaces to prevent the ingress/egress being blocked, and will leave the site after loading/unloading;
- (iii) No storage materials will be placed in the manoeuvring area to prevent the loading/unloading spaces and the manoeuvring area from being blocked;
- (iv) On-site staff will be deployed to manage traffic flow during the operation hours;
- (v) Traffic and road signs will be provided to prohibit right-turn movements from the site;
- (vi) Revolving warning lights and signs will be installed at the site entrance to alert staff and pedestrian when vehicles are entering or exiting the site, ensuring pedestrian safety.

In addition, according to the Applicant, the goods vehicles will not make more than 3 round trips at each non-peak hour (between 10am – 4pm) to transport the storage materials to/from the Application Site. There will be around 10 no. of staff working on-site. Considering the nature of the business and its operational needs, it is expected that there will only be 5 daily round trips for private vehicles to the Application Site.

The estimated traffic arising from the proposed development is as follows:

Time	No. of Trips (Medium Goods Vehicles)		No. of Trips (Private Cars)	
	In	Out	In	Out
08:00-09:00 (peak hour)	1	1	3	0
09:00-10:00 (peak hour)	2	2	0	0
10:00-11:00	3	3	0	0
11:00-12:00	3	3	0	0
12:00-13:00	3	3	0	2
13:00-14:00	3	3	2	0
15:00-16:00	3	3	0	0
16:00-17:00	3	3	0	0
17:00-19:00 (peak hour)	1	1	0	3

4.4 Drainage Proposal

Drainage facilities including 525mm peripheral U-channels and catchpits are proposed to collect the surface runoff and divert them to the existing drainage stream to the south of the Application Site. With the provision of drainage facilities, no surface runoff will be running from the Application Site to the nearby public road. A drainage proposal is submitted (see **Appendix 6**) to show the proposed drainage design. The Applicant will provide the drainage facilities to the satisfaction of Drainage Services Department (DSD).

4.5 Landscape

The Application Site is currently vacant, with wild grasses growing in the eastern part. Two temporary structures erected by the previous occupier will be removed. To the south and west is the Ping Yuen River, and the River Ganges Pumping Station is located further west across the river. As the Application Site is surrounded by approved planning applications for open storage (Application No. A/NE-MKT/54) and a logistics centre (Application No. A/NE-MKT/58), the proposed development is not considered incompatible with the landscape character of the surrounding area.

4.6 Fire Service Installations Proposal

In order to minimize the fire hazard, the Applicant will provide fire service installations (FSIs) to the satisfaction of the Fire Services Department (FSD). The FSIs proposal (see **Appendix 7**) is submitted with this application.

4.7 Environmental Considerations

The proposed development will consist solely of a warehouse for the storage of construction materials and miscellaneous goods. To minimize any potential environmental nuisance, the operator will adhere to the 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites' and will implement the following mitigation measures:

- (a) No open storage and workshop activities will be conducted at the Application Site;
- (b) The surface of the Application Site will be hard-paved to prevent dusty operations;
- (c) Loading / unloading activities will be located away from the residential dwellings;
- (d) The operating hours will be restricted to between 8:00 am and 7:00 pm from Mondays to Saturdays, with no operations on Sundays or public holidays;
- (e) No more than 3 round trips by goods vehicles will be permitted during each non-peak hour, in order to minimize traffic and noise impact; and
- (f) A washroom will be provided on site for staff. A septic tank will be installed to treat the sewage generated from the Application Site. The operator will follow ProPECC PN 1/23 to prevent any water pollution.

5. Planning Justifications

5.1 In Line with the Future Planning Intention of Northern Metropolis

With reference to the Northern Metropolis Action Agenda published in October 2023, the Application Site is located within the “Boundary Commerce and Industry Zone,” where the area near the Heung Yuen Wai Boundary Control Point has been earmarked for development of modern logistics and the upgrading of traditional industries. The operator, represented by the Applicant, runs a warehouse operations for storing construction materials and miscellaneous goods, a significant proportion of which are sourced from Mainland China. Therefore, the proposed development is considered consistent with the future planning intention for the area, as set out in the Northern Metropolis Action Agenda.

5.2 Meeting the Relocation Needs of the Applicant

Due to the ongoing land resumption projects in the Northern Metropolis, much private land in the Northern and North West New Territories has been or will be resumed by the Government for the development of NDAs and public works. The operator has encountered significant challenges in identifying a suitable site for their business due to limited availability of suitable sites and financial constraints. The only piece of land that meets the Applicant's immediate operational needs and that they could secure is the current Application Site.

The Application Site is conveniently located near Lin Ma Hang Road, which connects to Heung Yuen Wai BCP. This allows for the easy transportation of goods to and from the Application Site. The Application Site is also flat and vacant, allowing it to be quickly transformed into the proposed development for use by the operator. Given its accessible vehicular access and compatible size, the Application Site meets the Applicant's relocation needs and is the best location choice.

5.3 Not Contravene the Planning Intention of “REC” Zone

The Application Site falls within an area zoned “REC” on the Man Kam To OZP No. S/NE-MKT/7. Due to the surrounding developments, which consist mainly of scattered temporary structures and recently approved warehouses, open storage yards and a logistics centre, the planning intention of the “REC” zone has not been realised. Furthermore, no recreational activities have ever been carried out at the Application Site. As the proposed development is temporary in nature, it would not jeopardise the long-term planning intention of the “REC” zone.

5.4 Similar Applications Approved within the Same “REC” zone

Paragraph 3.3 states that the Board approved three similar applications (Nos. A/NE-MKT/42, 43 and 48) for warehouse uses between March and August 2025. Additionally, the Application Site is surrounded by approved planning applications for open storage (Application No. A/NE-MKT/54) and a logistics centre (Application No. A/NE-MKT/58) to the north and east, respectively. The approval of these applications indicates that the locality can accommodate warehouse and similar storage uses, which aligns with the future planning intention for the area under the Northern Metropolis Action Agenda. As the current proposed development is similar to these previously approved applications, it could also potentially be accepted by the Board.

5.5 Optimization of Valuable Land Resources

Rather than leaving the site to deteriorate, the proposed development provides an interim solution that makes the best use of the land, with the Applicant responsible for upkeep and maintenance. The proposed development is also considered fully commensurate with its local geographical setting, offering an ideal solution to maximise land use without having an undesirable environmental impact.

5.6 Not Incompatible with Surrounding Land Uses

The proposed development is not considered to be incompatible with the surrounding land uses. The area surrounding the Application Site mainly consists of warehouses, open storage sites, and a logistics centre, all of which have planning approvals for similar uses in the vicinity. Taking into account the mitigation measures proposed by the Applicant, including the prohibition of open storage and workshop activities on the Application Site and restrictions on operation hours, the proposed development could coexist well with these land uses without having an adverse environmental impact. As the proposed development is compatible with other developments and facilities in adjacent areas in terms of the nature and scale of its intended use, approval of the application would not result in any interface problems with the surrounding areas.

5.7 No Adverse Impacts on the Surrounding Areas

Due to the nature and size of the proposed development, it is not anticipated that there will be any adverse impacts on the surrounding areas. This is discussed below:

Traffic

The Application Site is directly accessible via Lin Ma Hang Road, with no more than 3 round trips per hour made by goods vehicles to and from the Application Site. Most vehicles will enter and exit the Application Site at non-peak hours (10am – 4pm). Therefore, it is anticipated that the proposed development will generate minimal traffic on Lin Ma Hang Road and will not overload the road should the application be approved. In addition, the swept path analysis (see **Appendix 5**), shows that sufficient space will be reserved for loading/unloading and vehicle manoeuvring at the eastern part of the Application Site. It is also unlikely that the minimal volume of traffic generated by the proposed development would have an adverse effect on the existing and/or planned road networks. There will also be no need for goods vehicles to queue outside the Application Site under any circumstances. Therefore, no adverse traffic impact is anticipated.

Environment

The Application Site will be used solely as a warehouse for storing construction materials and miscellaneous goods. No open storage and workshop activities will take place on the Application Site, and relevant mitigation measures will be implemented to minimize potential environmental impacts on the surrounding areas. Wastewater generated from the washroom will be treated by a septic tank. Additionally, operating hours will be restricted to between 8:00 am to 7:00 pm. It is unlikely that the proposed development will have a significant adverse environmental impact on the surrounding areas.

Drainage

Drainage facilities will be provided within the Application Site to collect and discharge surface runoff

effectively. The Applicant has submitted a drainage proposal (see **Appendix 6**) and will implement it to the satisfaction of DSD. Therefore, no adverse drainage impact will be generated by the Application Site.

5.8 No Creation of Undesirable Precedent

Having realized the Board is entitled to consider planning applications, concerns about setting an undesirable precedent by approving the current application may be minimal. The proposed development is exceptional and can be justified by the demand for warehouse relocation due to land resumption in support of the construction and retail industries in Hong Kong. The proposed development at the Application Site would support this. Therefore, permission is only proposed for the development under this application.

As the Board considers each planning application on its individual merits, the physical state of the Application Site and its surroundings are always assessed individually and differently, even if they are of a similar nature. Approving the current application should not therefore lead to the approval of other similar applications under any circumstances.

6. Conclusion

The Application Site falls within “REC” zone on the Approved Man Kam To OZP No. S/NE-MKT/7. The operator’s warehouse in Ha Tsuen was subject to land resumption for the Second Phase Development of Hung Shui Kiu/Ha Tsuen New Development Area (NDA) project. As the operator is required to relocate the warehouse, they urgently need to find a new site for the warehouse.

Due to the limited availability of sites on the market, the Applicant is having difficulty identifying a suitable alternative and has no other options. The Application Site is considered the best location due to its advantageous location, which provides direct vehicular access from Lin Ma Hang Road. Its location also allows valuable land resources to be optimized. Similar uses in the surrounding area mean that there will be no interface problems arising from the proposed development, given that similar warehouse applications have recently been approved in the vicinity.

Taking into account the location of the site and the surrounding land uses, as well as the nature of the proposed development, it is considered that the Application Site is the best location for the operator to continue their operations in the form of a temporary warehouse.

Despite the Application Site falling within the “REC” zone, the planning intention of “REC” is unlikely to be realized, given the lack of planned long-term recreational development in the area. In contrast, the proposed interim development at the Application Site is not deemed unsuitable for temporary use, given that the surrounding area is characterized by various storage and warehouse uses. No interface problems are expected to arise from the proposed development. Its location and geographical advantages will encourage the optimisation of valuable land resources and enable the Applicant to continue contributing to the construction and retail industries.

No adverse impact on the surrounding area is anticipated. The technical concerns raised by the relevant government departments can be addressed by implementing the approval conditions. Furthermore, the proposed development will not set an undesirable precedent.

In view of the justifications as presented in this planning statement, it is hoped that members of the Board and the relevant Government departments will approve this application for a period of 3 years.

Lawson David & Sung Surveyors Limited
July 2026