

Supplementary Statement

1) Background

- 1.1 The applicant seeks planning permission from the Town Planning Board (the Board) to use *Lots 1505 RP, 1506 S.A, 1506 S.B, 1506 S.C, 1506 S.D, 1506 S.E, 1506 RP, 1508 RP, 1509, 1510, 1511, 1517, 1518, 1519 RP, 1520 RP, 1522 RP, 1523, 1525, 1555 S.B RP (Part) and 1556 RP in D.D. 107 and Adjoining Government Land (GL), Kam Tin, Yuen Long, New Territories* (the Site) for **'Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land and Pond for a Period of 3 Years'** (proposed development) (**Plans 1 to 3**).
- 1.2 In view of the pressing demand for indoor storage space in recent years, the applicant would like to operate a warehouse in order to support the construction industry for the development in the New Territories.

2) Planning Context

- 2.1 The Site currently falls within an area zoned as "Agriculture" ("AGR") on the Approved Kam Tin North Outline Zoning Plan No.: S/YL-KTN/11 (**Plan 2**). According to the Notes of the OZP, the applied use is neither a column one nor two use within the "AGR" zone, which requires planning permission from the Board.
- 2.2 The proposed development is situated in a rural setting characterised by brownfield uses, including sites occupied by temporary structures for warehouses, workshops and open storage yards, hence, the proposed development is considered not incompatible with the surrounding areas. Although the Site falls within "AGR" zone, there is currently no active agricultural activities at the Site and its vicinity. Approval of the current application on a temporary basis of 3 years would better utilize deserted agricultural land and would not jeopardize the long term planning intention of the "AGR" zone.
- 2.3 Several similar S.16 planning applications for/partly for 'warehouse' use were approved by the Board within the same "AGR" zone between in the past five years, which the application site of the latest application (No. A/YL-KTN/1126) is located approximately 380m northeast of the Site, was approved by the Board on a temporary basis in August 2025. Therefore, approval of the current application would not set undesirable precedent within the "AGR" zone.

- 2.4 The Site is the subject of two previous S.16 planning applications (Nos. A/YL-KTN/951 and 953) for the same use, that were submitted by the same applicant as the current application. The aforesaid applications were approved by the Board on a temporary basis of 3 years in December 2023. The current application is designed to consolidate the application sites of the two previous applications to enable comprehensive management, thereby facilitating the efficient operation of warehousing activities.
- 2.5 In comparison to the combined previous applications, majority of the development parameters (i.e. site area, number of structures, building height, storeys of buildings and provision of parking and loading/unloading (L/UL) spaces) remains unchanged. While there is a minor increase in gross floor area (GFA) (i.e. from 13,330m² to 13,453m², +1%) to meet the operational needs. Comparison of the development parameters between the proposed scheme and the approved scheme under previous application No. A/YL-KTN/951 & 953 are summarized at **Appendix I**.
- 2.6 Since the scale and nature of the current application is similar to the previous applications combined, approval condition of the current application is considered in line with the Board's previous decision. During the approval period of the previous applications (No. A/YL-KTN/951 & 953), the applicant has made efforts in complying with approval conditions in regard to drainage and fire safety aspects
- 2.7 For drainage-related approval conditions, the applicant made several submissions of a drainage proposal/drainage impact assessment (DIA) for compliance with condition (d) of both applications whilst all submissions were considered not acceptable by the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD). Details are shown at **Table 1** below:

Table 1 – The Submission of a Drainage Proposal/DIA for Compliance with Approval Condition (d) of applications Nos. A/YL-KTN/951 and 953

Application No.	Date of Submission	Comments received from CE/MN, DSD
A/YL-KTN/951	1 st Submission: 20.02.2024 2 nd Submission: 04.03.2025	1 st Reply: 07.05.2024 2 nd Reply: 27.05.2025
A/YL-KTN/953	1 st Submission: 20.02.2024 2 nd Submission: 04.03.2025	1 st Reply: 07.05.2024 2 nd Reply: 18.07.2025

- 2.8 For fire safety related approval conditions, the applicant made several submissions of a fire service installations (FSIs) proposal for comply with condition (g) of both applications whilst all submissions were considered not acceptable by the Director of Fire Services (D of FS). Details are shown at **Table 2** below:

Table 2 – The Submission of a FSIs Proposal for Compliance with Approval Condition (g) of applications Nos. A/YL-KTN/951 and 953

Application No.	Date of Submission	Comments received from D of FS
A/YL-KTN/951	1 st Submission: 03.12.2024 2 nd Submission: 05.02.2025 3 rd Submission: 24.03.2025 4 th Submission: 26.05.2025	1 st Reply: 31.12.2024 2 nd Reply: 05.03.2025 3 rd Reply: 08.05.2025 4 th Reply: 09.07.2025
A/YL-KTN/953	1 st Submission: 05.12.2024 2 nd Submission: 05.02.2025 3 rd Submission: 24.03.2025 4 th Submission: 26.05.2025	1 st Reply: 31.12.2024 2 nd Reply: 05.03.2025 3 rd Reply: 08.05.2025 4 th Reply: 07.07.2025

- 2.9 The applicant did not have sufficient time to revise the DIA and FSIs proposals to address comments from CE/MN, DSD and D of FS, which led to the revocation of both applications on 08.06.2025.

3) Development Proposal

- 3.1 The Site occupied an area of 25,206 m² (about), including 171 m² (about) of GL (**Plan 3**). The operation hours of the Site are Monday to Saturday from 09:00 to 19:00. No operation on Sunday and public holiday. Six structures are proposed at the Site for warehouses (excl. D.G.G.) site offices, washrooms, FS pump room and FS water tank with total GFA of 13,453 m² (about) (**Plan 4**). The ancillary site office is intended to provide indoor workspace for administrative staff to support the daily operation of the Site. It is estimated that the Site would be able to accommodate 25 staff. As the Site is proposed for 'warehouse' use with no shopfront, no visitor is anticipated at the Site. Details of development parameters are shown at **Table 3** below:

Table 3 – Major Development Parameters

Application Site Area	25,206 m ² (about), including 171 m ² (about) of GL
Covered Area	13,453 m ² (about)
Uncovered Area	11,753 m ² (about)
Plot Ratio	0.53 (about)
Site Coverage	53% (about)
Number of Structure	6
Total GFA	13,453 m ² (about)
- Domestic GFA	Not applicable
- Non-Domestic GFA	13,453 m ² (about)
Building Height	3.5 - 13 m (about)
No. of Storey	1

- 3.2 The proposed warehouse is intended for storage of miscellaneous goods (i.e. packaged food, apparel, footwear, electronic goods, furniture etc), which are typically packaged in bulk or large in size, light goods vehicle (LGV) and medium good vehicle (MGV) are required for transporting large quantities of goods to enhance operational efficiency. No dangerous goods and workshop activities will be stored/conducted at the Site at any time during the planning approval period.
- 3.3 According to the aerial photos taken on 05.10.1990 by Survey and Mapping Office, Lands Department, about 1,623m² of the Site was found as ponds and have been filled since the 1990s. The current application serves to regularise the filled pond areas to facilitate the

proposed development. In addition, the Site is proposed to be filled with concrete of not more than 0.2m (about) in depth, from +3.5 to 4.2 mPD to +3.7 to 4.4 mPD, for site formation of structures and circulation space (**Plan 5**). As heavy loading of structures and vehicles would compact the existing soiled ground and weaken the ground surface, concrete site formation is required to meet the operation needs and that has been kept to minimal for the operation of the proposed development. The applicant will reinstate the Site to an amenity area after the planning approval period.

- 3.4 The Site is accessible from San Tam Road via Shui Mei Road and a local access (**Plan 1**). A total of 25 parking for staff and loading/unloading (L/UL) spaces are provided at the Site, details are shown at **Table 4** below:

Table 4 – Parking and Loading/Unloading Provisions

Type of Space	No. of Space
Private Car (PC) Parking Space - 2.5 m (W) x 5 m (L)	11
L/UL Space for LGV - 3.5 m (W) x 11 m (L)	7
L/UL Space for MGW - 3.5 m (W) x 16 m (L)	7

- 3.5 Sufficient space is provided for vehicle to smoothly manoeuvre within the Site to ensure that no vehicle will turn back onto the public road and local access (**Plan 6**). Staff will be deployed at the junction of San Tam Road and the ingress/egress of the Site to direct incoming and outgoing container vehicles to enhance road safety along the public road and local access. As traffic generated and attracted by the proposed development is minimal (as shown at **Table 5** below), adverse traffic impact should not be anticipated.

Table 5 – Estimated Trip Generation and Attraction

Time Period	PC		LGV		MGV		2-Way Total
	In	Out	In	Out	In	Out	
Trips at <u>AM peak</u> per hour (09:00 – 10:00)	7	0	3	0	0	0	10
Trips at <u>PM peak</u> per hour (17:00 – 18:00)	0	7	0	3	0	0	10
Traffic trip per hour (average) (10:00 – 17:00)	1	1	2	2	1	1	8

- 3.6 No open storage, dismantling, maintenance, repairing, cleansing, paint spraying or other workshop activities, and storage of dangerous goods will be carried out at the Site at any time during the planning approval period. 2.5 high solid metal wall will be erected along the site boundary to minimise the potential nuisance to the surroundings. The boundary wall will be installed properly by licensed contractor to prevent misalignment of walls, to ensure that there is no gap or slit on the boundary wall.
- 3.7 The applicant will strictly follow the '*Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites*' issued by Environmental Protection Department (EPD) to minimise adverse environmental impacts and nuisance to the surrounding area. The applicant will strictly 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. The applicant will follow the '*Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs)*' for sewage treatment at the Site.

4) Conclusion

- 4.1 The proposed development will not create significant nuisance to the surrounding areas. Adequate mitigation measures will be provided by the applicant, i.e. the submission of a DIA and FSIs proposal to mitigate any adverse impact that would arise from the proposed development after planning permission has been granted from the Board.
- 4.2 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 and Pond for a Period of 3 Years**'.

R-riches Planning Limited

October 2025

LIST OF PLANS

Plan 1	Location Plan
Plan 2	Plan Showing the Zoning of the Application Site
Plan 3	Plan Showing the Land Status of the Application Site
Plan 4	Layout Plan
Plan 5	Plan Showing the Filling of Land Area of the Application Site
Plan 6	Swept Path Analysis

APPENDICES

Appendix I	Comparison Table
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