

Supplementary Statement

1) Background

- 1.1 The applicant seeks planning permission from the Town Planning Board (the Board) to use *Lot 4115 (Part) in D.D. 104* (the Site) for '**Proposed Temporary Warehouse (Excluding Dangerous Goods Godown (D.G.G.)) and Open Storage of Construction Materials with Ancillary Facilities for a Period of 3 Years**' (the proposed development) (**Plans 1 to 3**).
- 1.2 In view of the pressing demand for indoor storage space in New Territories in recent years, the applicant would like to continue to use the Site to operate a warehouse for storage of miscellaneous goods (including but not limited to packaged herbal medicine, apparel, footwear, electronic goods, construction materials and machinery etc.); whereas the open storage is intended for the storage of construction materials (e.g. bricks, scaffold, steel beam etc.) to support the local warehousing and storage industry.

2) Planning Context

- 2.1 The Site currently falls within an area zoned "Other Specified Uses" annotated "Railway Reserve" ("OU(RR)") 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 not a column one nor column two use within the "OU(RR)" zone. Therefore, planning permission is required for the proposed development.
- 2.2 The Site falls within Category 2 area under the Town Planning Board Guidelines No. 13G (TPB PG-No. 13G), which is considered suitable for open storage and port back-up uses (**Plan 4**). Although the Site falls within area zoned as "OU(RR)" which is reserved for phase 2 development of the Northern Link alignment, the temporary basis of the development is considered not affecting the commencement of the railway project. Hence, approval of the application on a temporary basis of 3 years would not frustrate the long-term planning intention of the "OU(RR)" zone and better utilize precious land resources in the New Territories.
- 2.3 Furthermore, several applications for 'Warehouse' and 'Storage' uses were approved by the Board within/partly within the same "OU(RR)" zone in the previous 5 years, which the application site of the latest application (No. A/YL-KTN/949) for 'storage' use is located approximately 480m southwest to the Site, was approved by the Board on a temporary basis

of 3 years in September 2023. Hence, approval of the current application would not set an undesirable precedent within the "OU(RR)" zone.

- 2.4 The Site is the subject of an approved S.16 planning application (No. A/YL-KTN/841) for 'open storage' use submitted by the same applicant as the current application, which was approved by the Board on a temporary basis in July 2022. The applicant has made effort to comply with approval conditions of the previous application, details are shown at **Table 1** below:

Table 1 – Details of Compliance with Approval Conditions of the Previous Application

Approval Conditions of Application No. A/YL-KTN/841		Date of Compliance
(d)	The submission of a condition record of the existing drainage facilities	Not complied with
(f)	The submission of a revised fire service installations (FSIs) proposal	29.09.2022
(g)	The implementation of the revised FSIs proposal	Not complied with

- 2.5 During the approval period of the previous application, the applicant has made effort in complying with approval conditions in regard to drainage and fire safety aspects. Details are as follow:

Drainage aspect

For condition (d), the applicant has made submission with a photographic record showing the existing drainage facilities on the Site on 29.09.2022 and 18.08.2023 while both submissions were considered not acceptable by the Chief Engineering/Mainland North, Drainage Services Department (CE/MN, DSD). The applicant is therefore failed to comply with this condition within the specified period of time.

Fire safety aspect

For condition (f), the applicant submitted a FSIs proposal to comply with condition (f) on 22.08.2022. It was considered acceptable by the Director of Fire Services (D of FS) on 29.09.2022. However, the applicant faced difficulties in coordinating with the fire services contractors for the required installations and inspections. The scheduling conflicts and resource constraints on both sides resulted in delays in meeting installation requirements.

Therefore, the applicant failed to comply with this approval condition within the specified period.

- 2.6 In support of the application, the applicant has submitted a FSIs proposal and an as-built drainage record to minimise potential impact(s) to the surrounding areas, as well as for the consideration of relevant government bureaux/departments and members of the Board (Appendices I to II).

3) Development Proposal

- 3.1 The Site area is 690 m² (about) (Plan 3). The operation hours of the proposed development are Monday to Saturday from 08:00 to 19:00. No operation on Sunday and public holiday. A total of two structures are proposed at the Site for warehouse (excluding D.G.G.), storage of goods, site office and portable toilet with total GFA of 436 m² (about) (Plan 4). It is estimated that the Site would be able to accommodate 3 staff. As the Site is proposed for 'warehouse' use without shopfront, no visitor is anticipated at the Site. Details of development parameters are shown at Table 1 below:

Table 2 – Major Development Parameters

Application Site Area	690 m ² (about)
Covered Area	227 m ² (about)
Uncovered Area	463 m ² (about)
Plot Ratio	0.63 (about)
Site Coverage	33 % (about)
Number of Structure	2
Total GFA	436 m ² (about)
- Domestic GFA	Not applicable
- Non-Domestic GFA	436 m ² (about)
Building Height	3m - 8 m (about)
No. of Storey	1 - 2

- 3.2 The Site has already been hard paved for site formation of structure, loading/unloading (L/UL) and circulation spaces. The current application serves to regularize the existing land filling area. As heavy loading of vehicles and construction materials would compact the existing

soiled ground and weaken the ground surface, concrete site formation is required to meet the operational meet and that has been kept to minimal for the operation of the proposed development.

- 3.3 The Site is accessible from San Tam Road via a local access (**Plan 1**). A total of 3 parking and L/UL spaces will be provided within the Site, details are as shown below at **Table 3**:

Table 3 – Parking and L/UL provisions

Types of Space	No. of Spaces
Parking Space for Private Cars (PC) - 2.5 m (W) x 5 m (L)	2
L/UL Space for Light Goods Vehicle (LGV) - 3.5 m (W) x 7 m (L)	1

- 3.4 LGV is deployed for transportation of construction materials to/out of the Site, hence, L/UL space for the aforesaid vehicle is provided. Sufficient space is provided for vehicle to smoothly manoeuvre within the Site to ensure that no vehicle will turn back onto the local access (**Plan 5**). Staff will be deployed by the applicant to direct vehicle entering/exiting the Site to ensure pedestrian safety to/from the Site. As traffic generated and attracted by the proposed development as shown at **Table 4** below is minimal, adverse traffic impact to the surrounding road network should not be anticipated.

Table 4 – Estimated Trips Generation/Attraction

Time Period	Estimated Trips Generation/Attraction				
	PC		LGV		2-Way Total
	In	Out	In	Out	
Trips at AM peak per hour (08:00 – 09:00)	2	0	0	0	2
Trips at PM peak per hour (18:00 – 19:00)	0	2	0	0	2
Average trip per hour (09:00 – 18:00)	0	0	1	1	2

- 3.5 No storage of dangerous goods will be allowed at the Site at any time during the planning approval period. All construction materials would be stored at the designated storage area

(i.e. about 71 m²) with stacking height of not more than 3m. No dismantling, maintenance, recycling, cleaning, paint spraying and other workshop activities will be carried out at the Site at any time during the planning approval period.

- 3.6 The applicant will implement good practices stated in *Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPN) 1/24* to when designing on-site sewage system within the Site.
- 3.7 Relevant environmental protection/pollution control ordinances, i.e. *Water Pollution Control Ordinance, Air Pollution Control Ordinance, Noise Control Ordinance* etc. will be strictly complied with at all times during the planning approval period. The applicant will also follow relevant mitigation measures and requirements in the latest '*Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites*' issued by the Environmental Protection Department to minimise adverse environmental impacts and nuisance to the surrounding area.

4) Conclusion

- 4.1 The development will not create nuisance to the surrounding areas. Adequate mitigation measures are provided by the applicant, i.e. the submission a FSIs proposal and an as-built drainage record to mitigate any adverse impact arising from the proposed development (**Appendices I to II**).
- 4.2 In view of the above, the Board is hereby respectfully recommended to approve the subject application for '**Proposed Temporary Warehouse (Excluding D.G.G.) and Open Storage of Construction Materials with Ancillary Facilities for a Period of 3 Years**'.

R-riches Planning Limited

March 2026

LIST OF PLANS

Plan 1	Location Plan
Plan 2	Zoning Plan
Plan 3	Land Status Plan
Plan 4	TPB PG-No. 13G
Plan 5	Layout Plan
Plan 6	Swept Path Analysis

APPENDICES

Appendix I	Fire Service Installations Proposal
Appendix II	As-built Drainage Record