Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years at Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J ss.4 RP, 3719 S.J RP, 3719 S.Q ss.1 S.C RP in D.D. 104, Pok Wai, Yuen Long, N.T.

Planning Assessment Report

October 2026

Executive Summary

(*in case of discrepancy between English and Chinese versions, English version shall prevail*)

This Application is submitted to the Town Planning Board ("**the Board**") under Section 16 of the Town Planning Ordinance ("**the Ordinance**") for a temporary warehouse (excluding dangerous goods godown) with ancillary facilities for a period of 3 years ("**the Development**") at Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J ss.4 RP, 3719 S.J RP, 3719 S.Q in D.D. 104 at Pok Wai, Yuen Long, New Territories ("**the Application Site**").

The Application Site falls within an area zoned "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area" ("**OU(CDWRA)**") on the Approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/12 ("**the OZP**"). There has been no material change in the use of the Site since that time, and it has consistently been utilised for warehouse purpose. Approval of this application on temporary basis would not jeopardize the long-term planning intention of the "OU(CDWRA)" zone.

This Application aims to support the anticipated growth in logistics demand and the need for high-quality logistics sites and infrastructure. Recent policy initiatives, including the Chief Executive's 2025 Policy Address, the Action Plan on Modern Logistics Development, and the Action Plan on Maritime and Port Development Strategy, all demonstrate a clear policy direction to expand modern logistics capacity, promote high-end facilities, improve cargo-handling efficiency, strengthen multimodal connectivity, and advance smart, green and sustainable logistics operations. Hence, the Development would help meet the policy need by providing a properly managed warehouse and storage facility to support Hong Kong's wider objectives of reinforcing its role as an international logistics hub, enhancing port and maritime competitiveness, improving supply-chain efficiency, and promoting modern logistics services.

Similar applications within the same "OU(CDWRA)" zone in the vicinity have been considered and approved, and the Development is not anticipated to result in any adverse traffic, visual, landscape, drainage or environmental impacts.

In view of the above justifications, we would sincerely seek the favourable consideration of the Board to approve this Application.

內容摘要

(*如內文與其英文版本有差異，則以英文版本為準*)

本規劃申請根據《城市規劃條例》第 16 條，就在新界元朗堡圍丈量約份第 104 約地段第 3719 號 S.J 分段第 1 小分段 A 段餘段、第 3719 號 S.J 分段第 2 小分段餘段、第 3719 號 S.J 分段第 4 小分段餘段、第 3719 號 S.J 分段餘段及第 3719 號 S.Q（「申請地點」）向城市規劃委員會 (下稱「**城規會**」)申請作臨時貨倉（危險品倉庫除外）連附屬設施，為期 3 年 (下稱「**發展**」)。

申請地點現時位於《南生圍分區計劃大綱核准圖編號 S/YL-NSW/12》(下稱「**大綱圖**」) 上劃作為「其他指定用途」註明「綜合發展包括濕地修復區」地帶。申請地點的用途並無實質改變，並一直持續用作貨倉用途。鑑於該用途具持續性，且其性質並無任何實質改變，現有用途應被視為城規條例下可予容忍的「現有用途」。臨時批准本申請不會損害「其他指定用途」註明「綜合發展包括濕地修復區」地帶的長遠規劃意向。

本申請旨在配合物流需求的預期增長，以及對優質物流用地及基礎設施的需要。近期的政策措施，包括行政長官 2025 年《施政報告》、《現代物流發展行動綱領》及《海運及港口發展策略行動綱領》，均清楚顯示政府的政策方向為擴大現代物流容量、推動高端設施、提升貨物處理效率、加強多式聯運連繫，以及推進智慧、綠色及可持續的物流營運。因此，這發展將透過提供一個妥善管理的貨倉及貯物設施，以滿足上述政策需要。這發展亦將支持香港更廣泛的目標，包括鞏固其作為國際物流樞紐的角色、提升港口及海運競爭力、改善供應鏈效率，以及推動現代物流服務。

同區內位於「其他指定用途」註明「綜合發展包括濕地修復區」地帶的同類申請亦曾獲考慮及批准。這發展不會對交通、視覺、景觀、排水及環境方面造成不良影響。

鑒於以上提出的依據，我們真誠地尋求城規會批准該申請。

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1 INTRODUCTION

1.1 The Application

1.1.1 We are commissioned by the Land Owner to prepare and submit on its behalf this planning application for temporary warehouse (excluding dangerous goods godown) with ancillary facilities situated at Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J ss.4 RP, 3719 S.J RP and 3719 S.Q ss.1 S.C RP in D.D. 104, Pok Wai, Yuen Long, New Territories (**Figure 1**) ("**Site**") for a period of 3 years ("**Development**") to the Town Planning Board ("**Board**") under Section 16 of the Town Planning Ordinance ("**the Ordinance**").

1.1.2 The Site falls within an area of "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area" ("**OU(CDWRA)**") zone on the Approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/12 ("**the OZP**") (**Figure 5**).

1.1.3 The existing warehouse use is deemed permissible and does not require any planning approvals from the Board under the Town Planning Ordinance ("**TPO**") as the current use exists prior to the first publication of the Nam Sang Wai Interim Development Permission Area Plan No. IDPA/YL-NSW/1 on 17 August 1990. There has been no substantial change in the intended use and development of the Site, which remains for warehouse purposes.

1.1.4 Hence, while the current warehouse use at the Site is regarded as an existing use, planning permission is required for the proposed increase in height of existing structures.

1.1.5 The Proposed Development in this application has been carefully considered with reference to the development parameters of recently approved planning applications involving similar uses in the surrounding area. The comparison demonstrates that the proposed development is not excessive in terms of site area, gross floor area ("GFA") or plot ratio ("PR"), and that the provision of additional ancillary space is reasonable and necessary to support the intended use and its associated logistics operations

2 THE SITE AND DEVELOPMENT PROPOSAL

2.1 Current Condition of the Site

2.1.1 The Site covers an area of about 8,810 square metres ("sq. m."). The Site is currently used as warehouse purposes. The Application Site is hard paved and currently consists of 8 structures. The largest warehouse structure, which includes a rain shelter above the loading and unloading bays, as well as a site office, is primarily used for warehouse purposes. Ancillary facilities such as a guard house and a meter-room are situated near the south-east entrance, while a water tank for fire service installations and a staff rest room are located near the exit of the Application Site.

2.1.2 Along the southern boundary of the site, there are designated parking spaces for visitors, accommodating up to three private vehicles. Adjacent to the warehouse, there are a total of 12 loading/unloading bays specifically designed for container vehicles and 5 parking spaces for private vehicles. The loading platform of the warehouse is approximately 4 feet in height, allowing for convenient and direct access for loading/unloading operations of goods from the container vehicles. Visual references of this setup can be found in the provided photos below.





Diagram 1 Overview of the Application Site

2.1.3 The Site has direct access to Kam Pok Road West. The site is situated at the northeast of Kam Pok Road West and northwest of Yau Pok Road.

2.1.4 **Figure 1** illustrates the location of the Site and its immediate vicinity, with **Figure 2** illustrates the site plan.

2.2 Site History

2.2.1 The Site has been built as a covered warehouse structure. It is important to note that the purpose of warehouse has remained consistent throughout the entire duration.

2.3 Land Status

2.3.1 The Site comprises the Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J

ss.4 RP, 3719 S.J RP and 3719 S.Q ss.1 S.C RP in Demarcation District 104 ("**Subject Lots**").

2.3.2 There is a valid short term waiver on the Application Site permitting the erection of the existing structures with a total built over area of 7,086.5 sq.m and a height of 8.8 m.

2.4 Surrounding Context

2.4.1 Pok Wai is a sub-urban area located southeast of a large-scale residential development Fairview Park in Yuen Long, New Territories. The area is comprised of about ten villages and the major uses of land are warehouses and open storage. It is a logistic hub with all brownfield uses in Pok Wai. Pok Wai is served by a prominent road called San Tin Highway, which plays a significant role in transportation. The primary modes of transportation in the area are buses and minibuses, providing convenient access to Yuen Long and Sheung Shui MTR stations.



Diagram 2 Aerial Photo Showing the Current Condition of the Site
(*Source: Lands Department*)

2.4.2 The majority of Pok Wai is currently as a logistic hub with storage and warehouse being the predominant uses.

2.5 Existing Road Network

2.5.1 The Site can be accessed through Kam Pok Road West, which serves as an east-west two-way two-lane carriageway functioning as a local road. Kam Pok Road West connects to San Tin Highway which is a north-south two-way two-lane express. The Site is well served by public transport including Bus Route No. 268 and Minibus Route No. 36.

2.5.2 Such transport connectivity is essential to support the operational requirements of the temporary warehouse use. The direct linkage to the main road infrastructure enables efficient goods vehicle movements, including loading, unloading and distribution activities, while minimising travel time and logistical constraints. Adequate public transport provision also supports workforce accessibility. The overall accessibility of the Site is therefore considered suitable for sustaining the current warehouse operations.

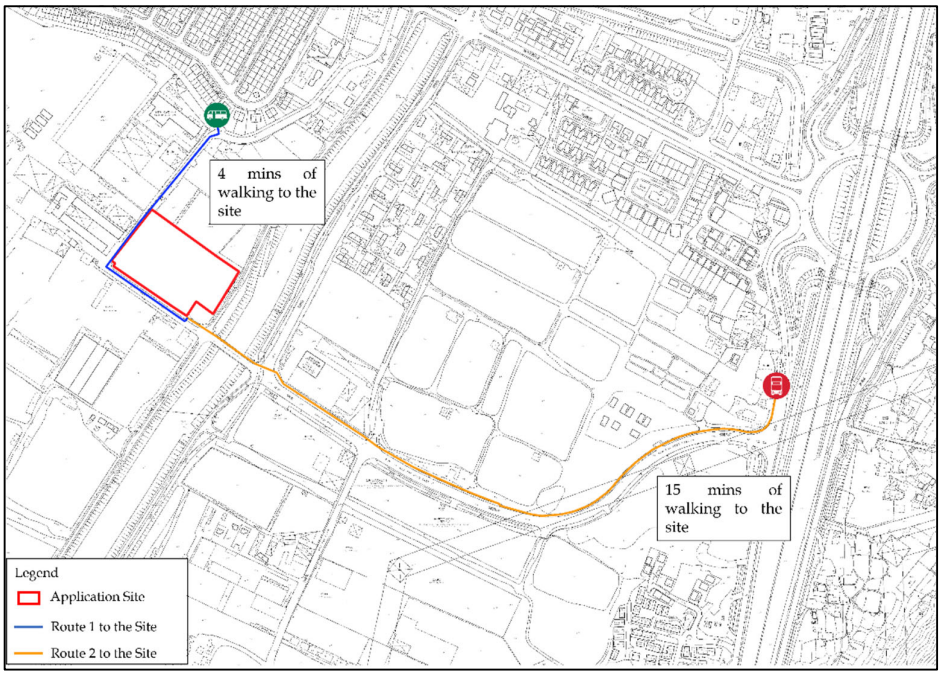


Diagram 3 Accessibility of the Application Site

2.5.3 The Site is located at the east edge of Pok Wai, with warehouses and open storage surrounding the site. The run-in and out is located at the southwestern boundary of the Applications Site, and the site is accessible from Kam Pok Road West connecting to the San Tin Highway.

2.6 Lok Ma Chau Boundary Control Point

2.6.1 The Lok Ma Chau Boundary Control Point ("**LMCBCP**") has served as a critical facilitator of cargo transportation since its establishment in December 1989. Initially dedicated to cargo trucks, it played a pivotal role in ensuring the smooth flow of goods across the border. Subsequently, in August 1991, the LMCBCP expanded its operations to encompass passenger services, further solidifying its position as a prominent transportation hub. With its efficient operations and robust infrastructure, the LMCBCP demonstrates its capacity to handle an impressive volume of 32,000 vehicle trips daily[1], underscoring its significance as a key gateway for trade and travel between

[1] The boundary control point at Lok Ma Chau, source: https://www.tlb.gov.hk/tc/policy/transport/issues/cbt.html

Hong Kong and the Mainland.

2.6.2 The advantageous proximity of the Site to the LMCBCP offers numerous benefits. The short distance between the two locations enables quick and convenient transportation, resulting in a mere 10-minute travel time. This close proximity not only minimizes transit time but also optimizes the movement of goods, thereby enhancing overall logistical efficiency within the region. **Figure 5** illustrates the accessibility.

2.6.3 Building upon the logistical efficiency derived from the close proximity to the LMCBCP, increasing the height of the warehouse structure becomes a catalyst for economic development. By accommodating a larger volume of goods and inventory within the existing footprint, the warehouse becomes better equipped to support increased trade and commerce. This, in turn, fosters the growth of local businesses, generates job opportunities, and stimulates economic prosperity within the region.

2.7 The Development

2.7.1 The Site covers an area of about 8,810 sq.m.

Development Parameters	**Existing Use** *(permitted under short-term wavier)*	**The Development in this Application**	**Changes**
Site Area	About 8,810 sq.m.	About 8,810 sq.m.	Nil
Covered Area	Not more than 7,086.5 sq.m	Not more than 7,086.5 sq.m	Nil
Permitted Maximum Storey of Structure	2 storeys	2 storeys	Nil
Permitted Maximum Height of Structure	8.8 meters	15 meters	+6.2 meters
Permitted Maximum Site Coverage	Not more than 7,086.5 sq.m	Not more than 7,086.5 sq.m	Nil
Nos. of Car Parking Spaces	Total: 17	Total: 17	Nil
- Private Vehicle	5	5	Nil
- Container Vehicle	12	12	Nil

2.7.2 The indicative layout plan of the Development is shown in **Figure 4.**

Operation Arrangement

2.7.3 The proposed operation hours of the warehouse are from 8am to 8pm, Monday to Sunday (including Public Holidays), which is similar to the existing operation.

3 PLANNING ASSESSMENT

3.1 Statutory Planning Context

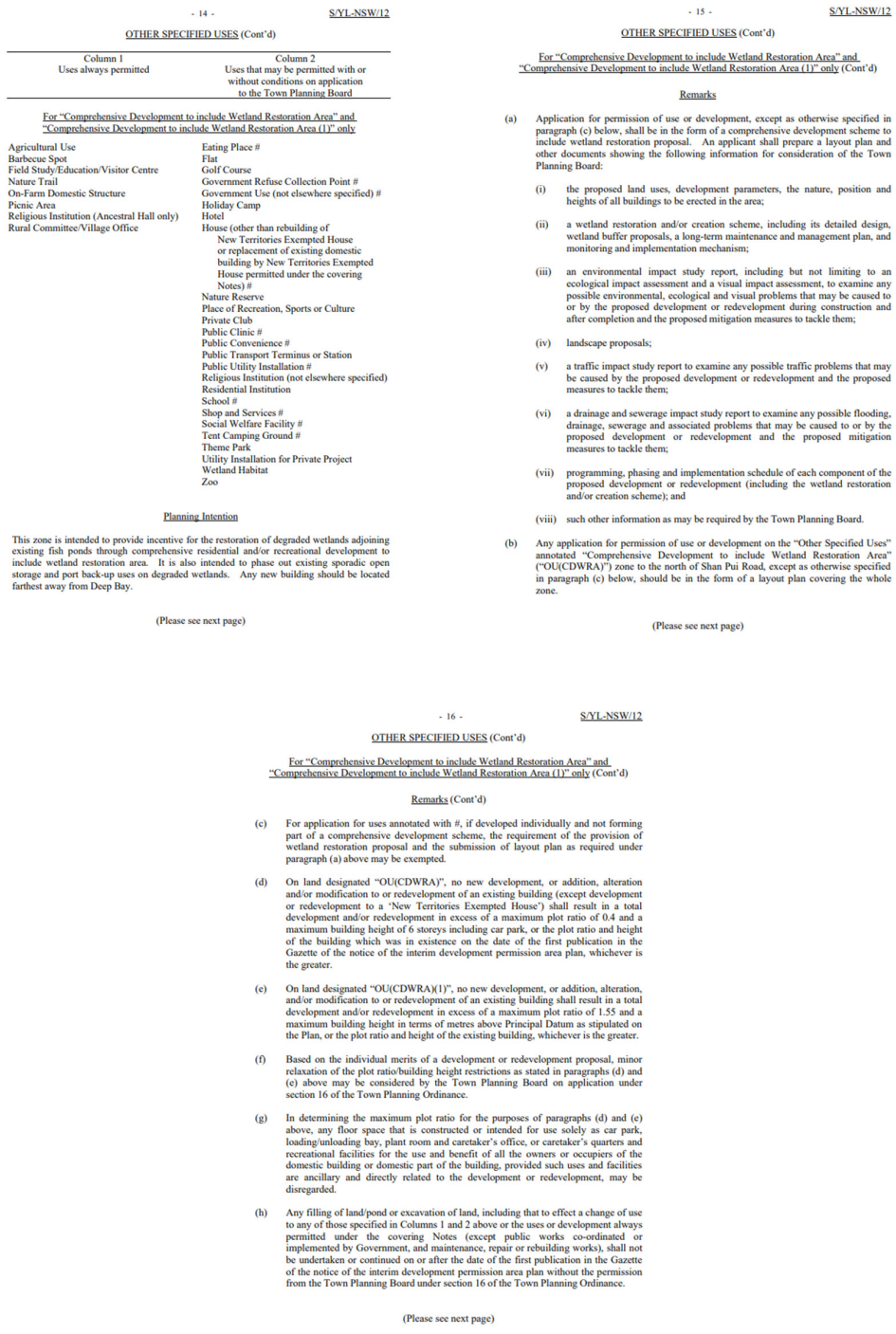
3.1.1 The Site falls within an area designated as "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area" ("**OU(CDWRA)**") zone on the Approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/12 ("**the OZP**") (**Figure 6**).

3.1.2 The Application Site has been used for warehouse purposes which is considered as an "Existing Use".

3.1.3 According to the covering Notes of OZP, excepted in areas zoned "Conservation Area" or "Other Specified Uses" annotated "Comprehensive Development and Wetland Enhancement Area", temporary uses for open storage and port back-up purposes or development of any land or building not exceeding a period of three years requires permission from the Town Planning Board. Notwithstanding that the use or development is not provided for in terms of the Plan, the Town Planning Board may grant permission, with or without conditions, for a maximum period of three years.

3.1.4 The Notes of the OZP for "OU(CDWRA)" zone state that 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 shall not be undertaken without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance, except public works co-ordinated or implemented by Government, and maintenance, repair or rebuilding works.

3.1.5 Planning permission is thus required for the Development.



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OTHER SPECIFIED USES (Cont'd)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board

For "Comprehensive Development to include Wetland Restoration Area" and "Comprehensive Development to include Wetland Restoration Area (1)" only

Agricultural Use
Barbecue Spot
Field Study/Education/Visitor Centre
Nature Trail
On-Farm Domestic Structure
Picnic Area
Religious Institution (Ancestral Hall only)
Rural Committee/Village Office
Eating Place #
Flat
Golf Course
Government Refuse Collection Point #
Government Use (not elsewhere specified) #
Holiday Camp
Hotel
House (other than rebuilding of New Territories Exempted House or replacement of existing domestic building by New Territories Exempted House permitted under the covering Notes) #
Nature Reserve
Place of Recreation, Sports or Culture
Private Club
Public Clinic #
Public Convenience #
Public Transport Terminus or Station
Public Utility Installation #
Religious Institution (not elsewhere specified)
Residential Institution
School #
Shop and Services #
Social Welfare Facility #
Tent Camping Ground #
Theme Park
Utility Installation for Private Project
Wetland Habitat
Zoo

Planning Intention

This zone is intended to provide incentive for the restoration of degraded wetlands adjoining existing fish ponds through comprehensive residential and/or recreational development to include wetland restoration area. It is also intended to phase out existing sporadic open storage and port back-up uses on degraded wetlands. Any new building should be located farthest away from Deep Bay.

(Please see next page)

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OTHER SPECIFIED USES (Cont'd)

For "Comprehensive Development to include Wetland Restoration Area" and "Comprehensive Development to include Wetland Restoration Area (1)" only (Cont'd)

Remarks

(a) Application for permission of use or development, except as otherwise specified in paragraph (c) below, shall be in the form of a comprehensive development scheme to include wetland restoration proposal. An applicant shall prepare a layout plan and other documents showing the following information for consideration of the Town Planning Board:

(i) the proposed land uses, development parameters, the nature, position and heights of all buildings to be erected in the area;

(ii) a wetland restoration and/or creation scheme, including its detailed design, wetland buffer proposals, a long-term maintenance and management plan, and monitoring and implementation mechanism;

(iii) an environmental impact study report, including but not limiting to an ecological impact assessment and a visual impact assessment, to examine any possible environmental, ecological and visual problems that may be caused to or by the proposed development or redevelopment during construction and after completion and the proposed mitigation measures to tackle them;

(iv) landscape proposals;

(v) a traffic impact study report to examine any possible traffic problems that may be caused by the proposed development or redevelopment and the proposed measures to tackle them;

(vi) a drainage and sewerage impact study report to examine any possible flooding, drainage, sewerage and associated problems that may be caused to or by the proposed development or redevelopment and the proposed mitigation measures to tackle them;

(vii) programming, phasing and implementation schedule of each component of the proposed development or redevelopment (including the wetland restoration and/or creation scheme); and

(viii) such other information as may be required by the Town Planning Board.

(b) Any application for permission of use or development on the "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area" ("OU(CDWRA)") zone to the north of Shan Pui Road, except as otherwise specified in paragraph (c) below, should be in the form of a layout plan covering the whole zone.

(Please see next page)

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OTHER SPECIFIED USES (Cont'd)

For "Comprehensive Development to include Wetland Restoration Area" and "Comprehensive Development to include Wetland Restoration Area (1)" only (Cont'd)

Remarks (Cont'd)

(c) For application for uses annotated with #, if developed individually and not forming part of a comprehensive development scheme, the requirement of the provision of wetland restoration proposal and the submission of layout plan as required under paragraph (a) above may be exempted.

(d) On land designated "OU(CDWRA)", no new development, or addition, alteration and/or modification to or redevelopment of an existing building (except development or redevelopment to a 'New Territories Exempted House') shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 0.4 and a maximum building height of 6 storeys including car park, or the plot ratio and height of the building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater.

(e) On land designated "OU(CDWRA)(1)", no new development, or addition, alteration, and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 1.55 and a maximum building height in terms of metres above Principal Datum as stipulated on the Plan, or the plot ratio and height of the existing building, whichever is the greater.

(f) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio/building height restrictions as stated in paragraphs (d) and (e) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

(g) In determining the maximum plot ratio for the purposes of paragraphs (d) and (e) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.

(h) Any filling of land/pond or excavation 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 development 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 interim development permission area plan without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.

(Please see next page)

Diagram 4 Extract of OZP No. S/YL-NSW/12
(Source: Town Planning Board, HKSAR Government)

3.2 Town Planning Board Planning Guideline

Town Planning Board Planning Guideline 12C

3.2.1 According to the Town Planning Board Planning Guideline 12C, the Site is situated within the Wetland Buffer Area. In particular, the intention of this zone is to protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds.

3.2.2 According to Appendix A of TPB PG-No. 12C, temporary uses are exempted from the requirement to submit an ecological impact assessment as part of an application to the Board. Hence, the Development, being temporary in nature, is not required for an ecological impact assessment submission.

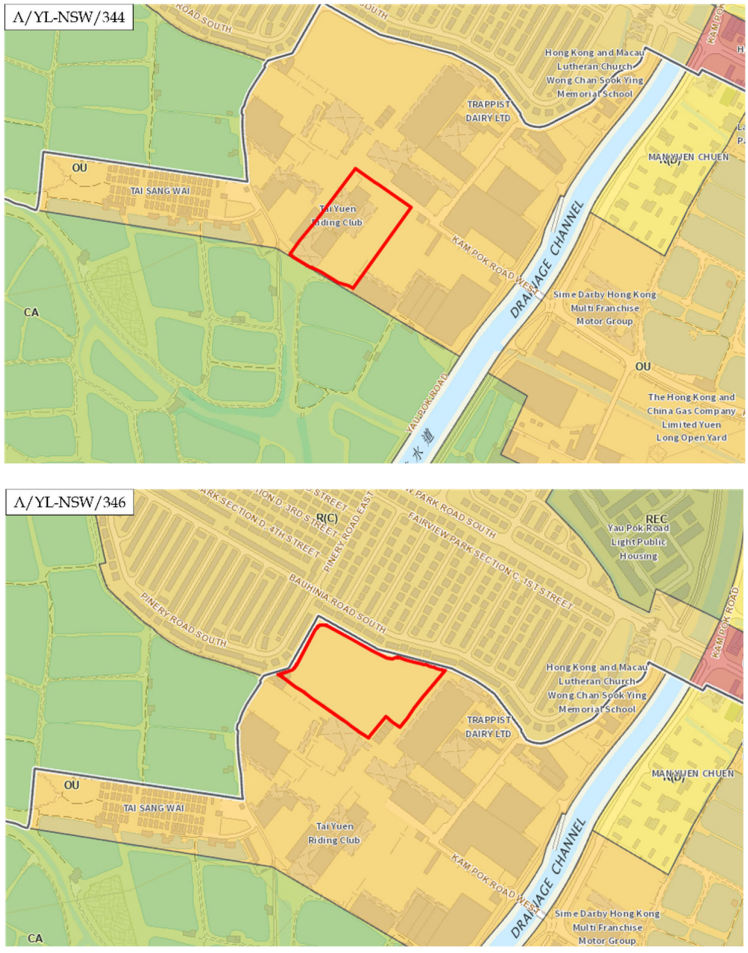
Town Planning Board Planning Guideline 13G

3.2.3 According to the Town Planning Board Planning Guideline 13G, the Site is situated within the Category 4 Area. While the Application Site is not located in close proximity to any ecologically sensitive area, the planning intention for Category 4 areas is generally to encourage the phasing out of such non-conforming uses as early as possible. Planning permission for a maximum period of 3 years may be allowed for an applicant to identify suitable sites for relocation.

3.2.4 Notwithstanding the above, sympathetic consideration may be given to applications where there are no adverse comments from relevant Government departments and no significant local objections. In this regard, favourable consideration could be offered where the Applicant demonstrates genuine efforts in complying with approval conditions of the planning permissions, and where relevant technical assessments and/or proposals are included in the current submission, if required, to demonstrate that the Development would not result in adverse drainage, traffic, visual, landscape or environmental impacts on the surrounding areas.

3.3 Precedent Approved Planning Applications in the Vicinity

3.3.1 Similar Planning Applications Nos. A/YL-NSW/344 and A/YL-NSW/346 in the vicinity were approved in 2025 for proposed temporary warehouse use (excluding dangerous goods godown) with ancillary facilities and associated filling of land and pond for a period of three years. They have plot ratios of 1.3 and 0.47, and building heights not exceeding 13m and 8.5m, respectively. The Development has similar development parameters. Thus, these planning approvals indicate strong planning precedent and support the view that the current proposal is not incompatible with the prevailing planning context, subject to appropriate mitigation measures and approval conditions.



Diagrams 5 and 6 Previous Approved Similar Applications in the Vicinity (*Source: Town Planning Board*)

Application No.	Proposed use	Building Height	Plot Ratio	Decision Date	Decision
A/YL-NSW/344	Proposed Temporary Warehouse (excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land and Pond for a Period of 3 Years	7 - 13 m (not more than 1-2 storeys)	1.3	2/5/2025	Approved with condition(s) on a temporary basis
A/YL-NSW/346	Proposed Temporary Warehouse (excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land and Pond for a Period of 3 Years	6 – 8.5 m (1 storey)	0.47	2/5/2025	Approved with condition(s) on a temporary basis

3.4 Drainage Consideration

3.4.1 The Development seeks to extend the height of existing warehouse structure from 8.8m to not more than 15m. It is intended solely to accommodate a larger storage capacity for goods, without resulting in additional drainage consumption. The existing use at the Site has been in operation for a considerable period, during which no flooding incidents have been reported. Hence, the existing drainage channel deemed to have sufficient capacity to accommodate surface runoff from both the Development and adjacent areas. No complaint of flooding has been received so far. Refer to **Figure 8** for the existing drainage plan.

3.4.2 The Proposed Development would continue to be used solely for warehouse purposes, which inherently generates minimal additional runoff. Considering the adequacy of the existing channel design, the Development is expected to have no detrimental effects on drainage. As a result, there is no anticipated adverse drainage impact.

3.5 Traffic Consideration

3.5.1 No change is made to the current layout within the Site which comprises a total of 12 container vehicle loading/unloading bays and 5 parking spaces for private vehicles, with two ingress/egress points of 11m wide and 9.7m wide, respectively. Increasing the height of the existing warehouse for accommodating a larger storage capacity for goods is expected to lead to a higher volume of traffic flow. However, it is important to note that the Site already possesses an adequate number of loading/unloading bays to manage the anticipated increase in traffic.

3.5.2 There is no any change in the current building layout of the Site and development intensity. Thus, there are no anticipated adverse traffic impacts resulting from the development. The existing loading/unloading bays are well equipped to handle the expected rise in traffic flow. This ensures that the overall traffic circulation within and around the Site will not be significantly affected by the proposed building extension.

3.6 Ecological Consideration

3.6.1 According to the Town Planning Board Planning Guideline 12C, the Site situated within the Wetland Buffer Area. The temporary uses fall within the list of uses exempted from submission of an Ecological Impact Assessment under Appendix A. Besides, the Site has been utilized for warehouse purposes since 1981. It is expected that there is no adverse impact on ecological aspect.

3.6.2 Considering the intended use is solely for warehouse purposes, the Development is not anticipated to have any detrimental effects or pollution on the nearby area. It is expected that there is no adverse impact on ecological aspect.

3.6.3 No change to the existing warehouse use is proposed, and no additional ecological-sensitive activities will be introduced.

3.7 Landscape Consideration

3.7.1 The whole of Site has been paved before 1990 and utilized for warehouse purposes for long period of time. There is currently no landscape resource on the Site. Upon the completion of Development, there is no adverse impact on the landscape perspective.

3.8 Environmental Consideration

3.8.1 The Applicant will follow the relevant mitigation measures and requirements in the latest "*Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites*" to minimize any potential environmental impact. No adverse environmental impact is anticipated.

3.9 Visual Compatibility

3.9.1 The Site is situated in area surrounded by open storage, warehouses, temporary structures, domestic structures, village type houses and vacant land. The existing use and the proposed building extension are considered compatible with the surrounding development context. No trees are identified within the current Site, therefore, no adverse visual impact is anticipated.

3.9.2 The current visual compatibility is considered satisfactory. The structures are compatible with the surrounding character.

3.10 Fire Safety Consideration

3.10.1 The latest "Fire Safety Requirements for Temporary Storage and Structure under Planning Application, Short Term Tenancy and Short Term Waiver" as revised by the Fire Servies Department in 2025 is observed and will be followed. It is anticipated that the construction and operation of the temporary warehouse will not have fire safety concerns with provision of fire services installation.

3.11 Cumulative Impact

3.11.1 It is anticipated that there will be no cumulative impact on the environmental, traffic, drainage and visual and landscape aspect. Thus, no cumulative impact is expected from this application.

3.12 Continued Operation and Relocation of the Logistics/Warehouse Use

Continuity of Existing Warehouse Use and Need for Relocation

3.12.1 The Site have been used as a covered warehouse structure for long period of time, and the nature and purpose of the warehouse operation have remained substantially unchanged throughout the period. The current application should therefore be regarded principally as a relocation and reprovisioning exercise to facilitate the continuity of an established business operation, rather

than the introduction of a fundamentally new form of use. The Affected Party's previous premises in the same location in Tai Sang Wai were affected by Government development and land resumption associated with the Yuen Long and Kam Tin Main Drainage Channels and the Ngau Tam Mei Main Drainage Channel. More recently, the Government has been advancing the Ngau Tam Mei New Development Area (NTM NDA) as part of the Northern Metropolis. The statutory planning framework for the NTM NDA has been taken forward, and site formation and infrastructure work for the NDA are now being progressed. Against this background, the Affected Party has made sustained efforts to identify suitable alternative premises so as to relocate the affected operation and maintain business continuity.

Extensive Site Search and Selection of the Application Site

3.12.2 The following **Table 1 and Diagrams 7 - 9** summarises the potential relocation sites considered by the Affected Party. As demonstrated in **Table 1**, the Affected Party has undertaken a substantial search for alternative premises in the New Territories. A number of sites were investigated but were ultimately found to be unsuitable or impracticable for the Affected Party's operational requirements for reasons including land-use compatibility, environmental constraints, land ownership and land control issues, accessibility, site configuration and insufficient site area.

Table 1 Comparison of Potential Relocation Sites

	Application Site	**Alternative Site 1**	**Alternative Site 2**	**Alternative Site 3**
Location	Various Lots in D.D. 104 and Adjoining Government Land, Pok Wai, New Territories	Lots 611 (Part) and 682 (Part) in D.D. 84, Hung Lung Hang, New Territories	Lot 253 in D.D.80, Lin Ma Hang Road, Ta Kwu Ling North, New Territories	Various Lot 102s in D.D. 83, Kwan Tei, New Territories
Site Area	About 8,810m^2	About 5,430m^2	About 4,815m^2	About 977m^2
Accessibility	Directly accessible to Kam Pok Road West connecting to San Tin Highway	Barely accessible to Ping Che Road via a series of local access, mostly single-track roads	Accessible though Lin Ma Hang Road, a single-track road	Connected to Sha Tau Kok Road – Lung Yeuk Tau through a local road
Outline Zoning Plan	Approved Nam Sang Wai OZP No. S/YL-NSW/12	Approved Hung Lung Hang Outline Zoning Plan No. S/NE-HLH/11	Approved Ta Kwu Ling North OZP No. S/NE-TKLN/2	Approved Ping Che and Ta Kwi Ling Outline Zoning Plan No. S/NE-TKL/14

Zoning	"Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area"	"Agriculture"	"Recreation"	"Open Storage"
Existing Condition	Generally hard-paved, fence-off and currently occupied by a temporary structure	Mostly hard-paved with some area covered with vegetation. Occupied by a few temporary greenhouse structures	Vacant and partly covered with vegetation	Vacant and hard-paved
Surrounding Area	Major uses of nearby land are warehouses and open storage	The surrounding areas are rural in character comprising temporary structures, active/fallow agricultural land, vacant land and wooded area	Predominantly rural in character comprising active/fallow agricultural land, ponds, temporary structures, tree clusters and woodland	Major uses of nearby land are warehouses and open storage with some temporary residential structures
Suitability for Relocation	Suitable for relocation - Not incompatible with the surrounding area Easily accessible	Not suitable for relocation - Not accessible to major road network Local road with insufficient width and maneuvering space for goods vehicle	Not suitable for relocation - Not accessible to major road network - Adverse traffic impact to local roads which are mostly single-track roads The site is irregular in shape and difficult to accommodate the proposed development	Not suitable for relocation - The site is too small in size to accommodate the affected operation to be relocated - The lots are subject to land ownership dispute Local road with insufficient width and maneuvering space for goods vehicle

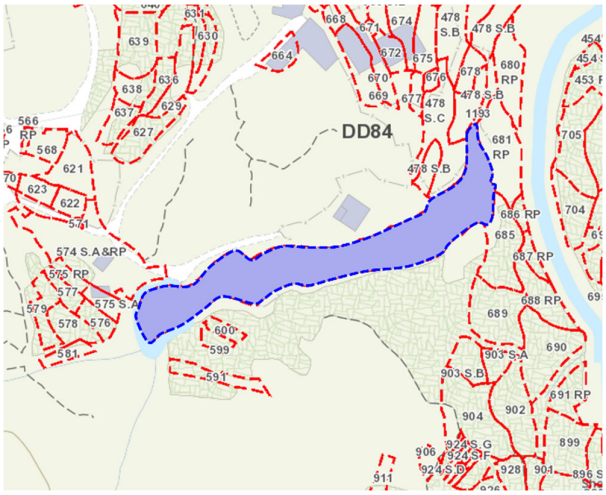


Diagram 7 Alternative Site 1
(*Source: GeoInfo Map)*

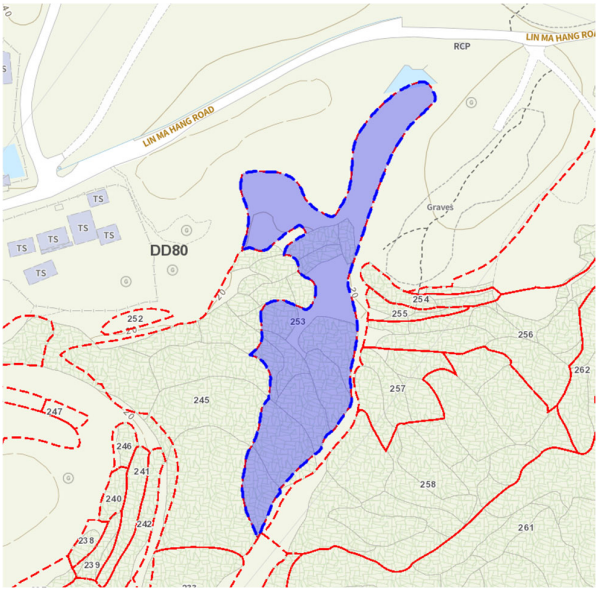


Diagram 8 Alternative Site 2
(*Source: GeoInfo Map)*

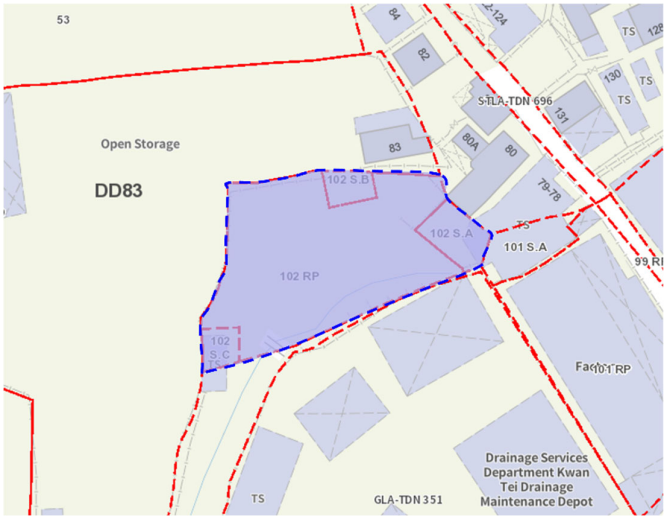


Diagram 9 Alternative Site 3
(*Source: GeoInfo Map)*

3.12.3 No other sites of comparable size, formation, access and lease/tenure feasibility were identified within the same search area that could accommodate the Affected Party's operational requirements within a reasonable timeframe.

3.12.4 The site-search exercise demonstrates that the Affected Party has not sought to expand its operation without due consideration of alternative locations. Rather, the Affected Party has endeavoured to identify a practicable site capable of accommodating its established warehouse/logistics operation following the loss of the previous premises. After a protracted search process, the Subject Site was identified as a suitable relocation opportunity. Its relatively flat formation and direct accessibility from Kam Pok Road West confer practical advantages for the movement of goods and operational vehicles, and are conducive to the continued efficient operation of a warehouse/logistics use.

3.12.5 The proposed relocation should also be considered within the wider context of the Government's current policy direction for the logistics sector. The *Action Plan on Modern Logistics Development* (2023) identifies smart development, modernisation, green and sustainability, internationalisation and facilitation as the five key directions for the sustainable and high-quality development of Hong Kong's logistics industry. More recently, the Government has reiterated that the logistics industry is one of Hong Kong's pillar industries and has been implementing measures to address the sector's short-, medium- and long-term demand for logistics sites. In this context, demand for logistics space is expected to increase, and approval of this application would help to ease the existing shortage of operational logistics premises while supporting the Government's strategic objective of

developing Hong Kong into a sustainable, international smart logistics hub.

Proposed Warehouse Operation and Operational Requirements

3.12.6 The proposed development comprises the operation of a warehouse, excluding dangerous goods godown (D.G.G.), together with ancillary facilities required to support the day-to-day operation of the Site. The applied use is consistent in nature with the Affected Party's established warehouse use and is intended to provide a suitable and sustainable premises for the continuation of the existing business operation. Although the proposed GFA is about 6,780 sq.m larger than those of the previous premises, the increase is directly related to the Affected Party's operational requirements and the need to provide adequate indoor storage and supporting space.

3.12.7 While the additional floor space will enhance operational efficiency in several aspects. The ground floor can remain dedicated to primary goods receipt, dispatch, loading and unloading and high-turnover storage, thereby maintaining efficient vehicle circulation and minimising double-handling at ground level. The second-floor space will be used for secondary storage, bulk breaking, packaging, sorting and other supporting activities that do not require direct vehicular access. This separation improves the overall workflow, alleviates congestion on the ground floor, facilitates better inventory organisation, and promotes safer and more orderly day-to-day operations.

3.12.8 Hence, the proposed development would allow the Affected Party to consolidate its warehouse functions and improve the efficiency of goods handling, including storage, bulk breaking and goods packaging, as appropriate to the nature of its business which help maintaining and enhancing Hong Kong's position as an international logistics hub.

3.12.9 The provision of an appropriately sized and purpose-suited warehouse premises is also consistent with the Government's current efforts to facilitate the modernisation and upgrading of Hong Kong's logistics sector. The Government has been actively identifying and releasing suitable logistics sites and developing modern logistics clusters to address the industry's long-term demand for logistics land. In January 2026, the Government announced the findings of its planning study for a modern logistics cluster in Hung Shui Kiu/Ha Tsuen and stated that the proposed cluster is intended to address the logistics industry's long-term demand for logistics sites. In August 2026, the Government further invited the market to submit expressions of interest for selected land parcels within the HSK Logistics Cluster, with about 32 hectares reserved for modern logistics development.

4 PLANNING MERITS & JUSTIFICATIONS

4.1 Recent Government Policy Support for the Warehouse and Storage Development

4.1.1 According to the latest "Hong Kong Major Transport Infrastructure Development Blueprint" published by the Transport and Logistics Bureau on 12 December 2023, the Site falls within the "Premier International Hub" area and the "Northern Metropolis" area. These areas are strategically designated to meet the commuting demands of the public and visitors, as well as to support the Hong Kong's development objectives by fostering cross-boundary integration with the Mainland, particularly with other cities in the Greater Bay Area, and establishing global connections. Numerous transport infrastructures are currently being planned, designed, and constructed in these areas. In light of the anticipated expansion of supporting infrastructure and the corresponding increase in logistics demand, it is considered both reasonable and necessary to optimise development intensity, including increasing storage capacity. Furthermore, recent Government initiatives promoting more land-efficient logistics developments, together with the modernisation and upgrading of existing storage facilities, underscore the growing demand for high-quality logistics sites and supporting infrastructure. The Government's launch of the Future Innovative Logistics Acceleration Scheme (FILAS) in June 2026 further demonstrates the clear policy direction towards digitalisation, modernisation and efficiency enhancement within the logistics industry.



Diagram 10 Application Site within the "Premier International Hub" area and the "Northern Metropolis" area

4.1.2 The Government has also repeatedly recognised the strategic importance of the logistics industry to Hong Kong's economy and its role in maintaining Hong Kong's status as an international logistics hub, international maritime centre and regional cargo gateway. Recent policy initiatives, including the **Chief Executive's 2025 Policy Address, the Action Plan on Modern Logistics Development, and the Action Plan on Maritime and Port Development Strategy**, all point to a clear policy direction of increasing modern logistics capacity, promoting high-end logistics facilities, enhancing cargo-handling efficiency, strengthening multimodal connectivity, and developing smart, green and sustainable logistics operations. In particular, the Government has confirmed that there is a shortage of suitable logistics land and has taken active steps to release new logistics sites and plan modern logistics clusters.

4.1.3 Hence, against the above policy background, the Development is in line with the Government's broader objective of strengthening Hong Kong's role as a premier international logistics hub. The proposed enhancement of the existing warehouse use would not only make more efficient use of land resources, but also support the evolving operational needs of the logistics sector in response to increasing cross-boundary and international connectivity.

4.2 Exceptional Circumstances for a Category 4 Site

4.2.1 While it is acknowledged that the application site falls within a Category 4 area under TPB PG-No. 13G, the present application is supported by exceptional circumstances. The development is not for an uncontrolled or high-impact open storage use, but for a managed warehouse and storage facility serving genuine logistics needs. The existing warehouse use is supported by relevant Government policy directions on modern logistics, maritime and port development, and will be subject to strict operational controls and technical mitigation measures to ensure that no adverse impacts will be caused to the surrounding area.

4.2.2 The proposed height extension is a vertical improvement and would not enlarge the physical footprint of the warehouse. No adverse impact is anticipated from the Development.

4.2.3 The application is made on a temporary basis. The existing warehouse use at the Site has been in operation for long period of time and has continued over a long period without material change of use, indicating that it is not incompatible with the surrounding context or the planning intention of the area. The Applicant is willing to implement mitigation measures and comply with the approval conditions, if there is any, upon planning approval granted by the Board. In view of the exceptional circumstances, genuine operational need and low-impact nature of the use, sympathetic consideration by the Town Planning Board is respectfully requested.

4.3 "No-Net-Loss in Wetland" Principle

4.3.1 It is important to clarify that our intention is not to harm the wetland or impose adverse environmental effects. Instead, our aim is to increase the

height restriction while avoiding any additional negative impacts on the environment.

4.3.2 The existing warehouse has already been constructed and occupies a specific area. The proposed vertical expansion would not result in an expansion of the warehouse's physical footprint. Therefore, it would not encroach further into the wetland or cause additional disturbance to its habitats. Besides, the proposed building extension would not, in itself, change the nature of the existing warehouse operation or introduce new activities that would generate additional pollution or environmental nuisance.

4.4 Comparison of Site Area, GFA, Plot Ratio and Surrounding Compatibility

4.4.1 According to **Table 2 and Diagram 11-15**, the proposed site area is similar to, or even smaller than, that of recently approved Section 16 applications involving similar uses. The proposed site area should therefore be considered reasonable having regard to the scale and operational requirements of comparable approved developments in the locality.

4.4.2 The proposed GFA is substantially lower than that of similar approved applications in the surrounding area. This demonstrates that the proposal is not seeking to maximise the development intensity of the site. Instead, an appropriate proportion of the site is retained for ancillary and operational purposes, which are important to the effective functioning of the proposed use.

4.4.3 The proposed PR is similar to, or lower than, that of comparable approved applications. The proposed development intensity is therefore broadly consistent with the established planning context of the surrounding area. The relatively modest PR also indicates that the additional space sought is not intended to create an overly intensive development, but rather to accommodate the practical operational requirements associated with the applied use.

Table 2. Comparison of Development Parameter of Similar Application in the Surrounding

	Site Area(sq.m)	GFA(sq.m)	Plot Ratio (about)
Current Planning Application	8,810	13,866.5	1.57
A/YL-NSW/334 (approved on 11/04/2025)	11,770	13,298	1.1
A/YL-NSW/342 (approved on 23/05/2025)	16,483	25,394	1.5
A/YL-NSW/343 (approved on 02/05/2025)	12,980	19,974	1.5
A/YL-NSW/344 (approved on 02/05/2025)	15,878	21,143	1.3
A/YL-NSW/337 (approved on 15/08/2025)	7,736	10,931	1.4
A/YL-NSW/367 (approved on 22/05/2026)	7,736	10,931	1.4
Average:	**11,695**	**16,505.36**	**1.384286**



Diagram 11 Location of A/YL-NSW/334

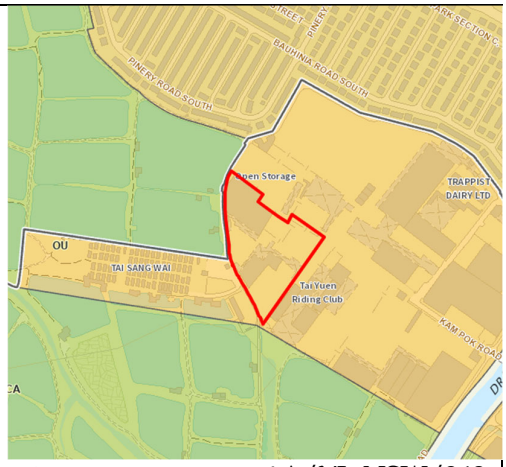


Diagram 12 Location of A/YL-NSW/342

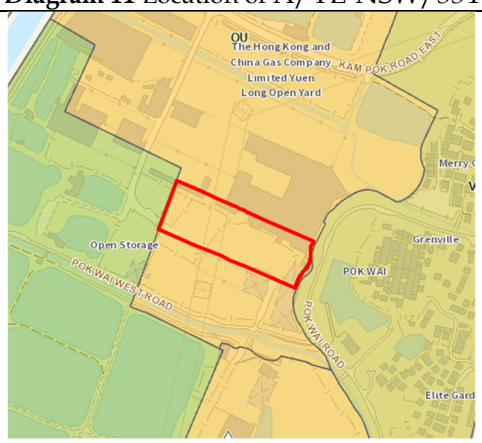


Diagram 13 Location of A/YL-NSW/343

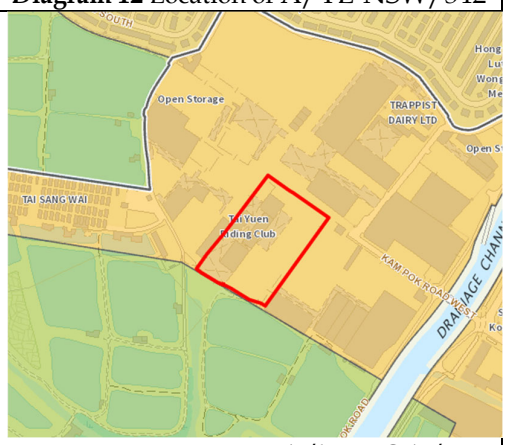


Diagram 14 Location of A/YL-NSW/344



Diagram 15 Location of A/YL-NSW/337 and A/YL-NSW/367

4.5 Precedent of Recently Approved Applications

4.5.1 Recently approved applications, in particular A/YL-NSW/337 and A/YL-NSW/367, provide relevant precedents demonstrating that a reasonable amount of ancillary space is necessary for developments of similar scale and intensity. These applications indicate that the operational requirements of the applied use extend beyond the provision of the principal accommodation and include supporting areas for storage, circulation, manoeuvring, loading/unloading and other associated logistics activities.

4.5.2 The provision of such ancillary space is therefore an integral part of ensuring that the proposed use can operate efficiently and safely within the site.

4.6 Relevant Consideration of A/YL-NSW/344

4.6.1 The planning circumstances of A/YL-NSW/344 also demonstrate the importance of providing sufficient ancillary space to support the operation of similar uses. In that application, the proposed site area was approximately 15,878 sq.m, which was 5,828 sq.m, or about 58 percent, larger than the affected premises of approximately 10,050 sq.m. The additional area was considered necessary to meet the demand for indoor storage and to provide sufficient space for storage, manoeuvring and goods packaging.

4.6.2 The aforementioned precedents show that additional site area beyond the main operational premises can be justified where it is needed to meet the practical requirements of the proposed use. Similar planning considerations are applicable to the Proposed Development, particularly in view of the growing demand for the applied use and the need to provide adequate space for its associated logistics operations.

4.7 Would Not Jeopardize the Long-term Planning Intention

4.7.1 The Development is temporary in nature. It would not jeopardize the long-term planning intention of the "OU(CDWRA)" zone. The temporary use for a period of 3 years also conforms to the covering Notes of the OZP. The Application Site falls completely within the "OU(CDWRA)" zone, however, it should be recognised that the existing use at the Site has been in continuous operation for long period of time. The Site has therefore long been formed, disturbed and occupied for storage-related activities. The continuation of the existing temporary use, together with the proposed minor building extension, would not result in the loss of an existing wetland habitat, nor would it materially reduce the ecological value of the wider wetland system. The Development would not jeopardize the long-term planning intention of the "OU(CDWRA)" zone.

4.8 Concentrated Storage with Proper Fire Services Equipment and Drainage Facilities

4.8.1 The warehouse facility located at the Application Site is equipped with a reliable sprinkler system, ensuring the presence of effective fire safety measures. Furthermore, appropriate drainage facilities have been constructed

to efficiently direct surface runoff towards nearby public drains. Refer to **Figure 8** for the existing drainage plan.

4.8.2 In contrast to the scattered storage practices observed in 1990, the concentration of storage activities within a single covered structure brings about several environmental benefits. Notably, this consolidation helps prevent noise and dust emissions from affecting the surrounding areas. By centralizing the storage operations, the site contributes to a cleaner and quieter environment, reducing potential disturbances in the nearby vicinity.

4.9 Local Community Support

4.9.1 The previous short term waiver applications for the Site received significant support from the local community. Numerous letters of support were submitted with the previous short term waiver applications, demonstrating the endorsement of village representatives from nearby communities. This indicates that the warehouse use of the Site provides valuable benefits to the surrounding community. Besides, the Development will not only contribute to the economic growth and development of the community but also generate employment opportunities for the local population by expanding the storage capacity and the logistics capabilities.

4.10 Situated at a Convenient Location next to LMCBCP

4.10.1 The Site enjoys a highly advantageous location, positioned within a mere 10-minute drive from the LMCBCP. This proximity provides exceptional convenience for logistical operations. The strategic placement of the Site in such close proximity to the LMCBCP significantly reduces transportation time and costs, facilitating efficient movement of goods and resources. This advantageous position not only enhances the convenience of operations but also contributes to streamlining supply chains and optimizing overall logistics processes. The Site's convenient location serves as a valuable asset for businesses and further reinforces its suitability for various logistical purposes.

4.11 Supported by Similar Approved Applications in the Vicinity

4.11.1 Two recent planning approvals have been identified at the adjoining site under Application Nos. A/YL-NSW/344 and A/YL-NSW/346, which were approved with conditions by the Town Planning Board in 2025 for proposed temporary warehouse (excluding dangerous goods godown), with ancillary facilities and associated filling of land and pond for a period of three years. These approvals are directly relevant to the present application because they demonstrate that temporary warehouse uses of similar nature and development intensity have recently been considered acceptable by the Town Planning Board in the immediate locality, subject to appropriate planning controls and mitigation measures. The Development follows the same planning approach. It is noted that the approved applications have plot ratios of 1.3 and 0.47, with building heights not exceeding 13m and 8.5m respectively. The Development has similar development parameters. Thus, it would not be incompatible with the established and recently accepted

planning context of the surrounding area. It will be operated in a controlled manner, with appropriate mitigation measures to ensure that no adverse traffic, drainage, environmental, landscape, visual or fire safety impacts would arise.

4.11.2 Approval of this planning application would not set an undesirable precedent, but would be in line with the recent government policies as well as Board's recent decision for a similar warehouse development in the immediate locality.

4.12 Compatible with the Surrounding Development with No Adverse Visual and Landscape Impact

4.12.1 The Development is visually compatible with the surrounding environment, which is mainly composed of open storage, warehouses, temporary structures, domestic structures, village type houses. There is no change to the rural village landscape and wetland characters as well. No adverse visual and landscape impact is anticipated.

4.13 No Adverse Traffic Impact

4.13.1 The Development will not incur adverse traffic impact. The traffic volume generated by the Development is low. Therefore, it is expected that there will not be significant negative impacts regarding the safety of road users and the traffic network of the area concerned.

4.14 No Adverse Environmental Impact

4.14.1 The Development is for warehouse purpose. Any environmental polluting activities would not be permitted on the site. Moreover, the latest "Code of Practice on Handling Environmental Aspects of Open Storage and Temporary Uses" issued by Environmental Protection Department will also be followed. Therefore, there will not be adverse environment impacts including noise and air quality.

4.15 No Adverse Drainage Impact

4.15.1 The existing drainage channel has sufficient capacity to accommodate surface runoff from both the Development and adjacent areas. No adverse drainage impact is anticipated.

5 CONCLUSION

5.1.1 In view of the above, we respectfully request the Board Members to give favourable consideration on this planning application.