



## **Section 16 Planning Application**

Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years

Lot Nos. 984 RP(Part), 993 RP (Part), 994 (Part), 995 RP, 996 RP, 997 RP in D.D.121, Tong Yan San Tsuen, Yuen Long, New Territories

### *Planning Statement*

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## EXECUTIVE SUMMARY

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

This Planning Statement is submitted to the Town Planning Board (hereinafter referred to as “the Board”) in support of a planning application (hereinafter referred to as “the current application”) for **Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years** (hereinafter referred to as “the proposed use”) at Lot Nos. 984 RP(Part), 993 RP (Part), 994(Part), 995 RP, 996 RP, 997 RP in D.D.121, Tong Yan San Tsuen, Yuen Long, New Territories (hereinafter referred to “the application site”). The Planning Statement serves to provide background information and planning justifications in support of the proposed use in order to facilitate consideration by the Board.

The existing business operation at Yuen Long for recyclable collection centre was affected by the Second Phase Development of Yuen Long South New Development Area (YLS NDA), and land resumption process commenced in May 2025. The current application seeks to facilitate the relocation of existing business operations at the application site and allow continual operations. The application site falls with an area zoned “Residential (Group D)” (“R(D)”) on the approved Tong Yan San Tsuen Outline Zoning Plan No. S/YL-TYST/14. As detailed throughout this Planning Statement, the proposed use is well justified on the grounds that:-

- (a) The current application is submitted for the relocation of existing operations affected by the second phase of the YLS NDA development. This relocation aims to ensure operational continuity and support an upgraded, safer, and more spacious facility to meet growing infrastructural demands;*
- (b) The proposed use is temporary in nature. Approval of this application would not jeopardize the long-term planning intention of the “R(D)” zone or any planned infrastructural developments at the application site and its neighborhood;*
- (c) The proposed use intends to temporarily utilize the adjoining brownfield area to continue existing operations, allowing for the optimization of land resources without compromising long-term development;*
- (d) The proposed use is not considered incompatible with the surrounding land uses and has minimal to no adverse visual impacts on the surrounding area and neighborhood;*
- (e) The applicant will adhere to the latest ‘Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites’. No adverse traffic, environmental, or infrastructural impacts arising from the proposed use are anticipated; and*
- (f) The proposed use will not set an undesirable precedent as similar application is identified on the same OZP.*

In view of the above and the list of detailed planning justifications in the Planning Statement, it is sincerely hoped that the Board will give sympathetic consideration to approve the current application for the proposed use for a temporary period of 3 years.

## 行政摘要

(如內文與其英文版本有差異，則以英文版本為準)

此規劃報告書旨在支持一宗遞交予城市規劃委員會（以下簡稱「城規會」）的規劃申請（以下簡稱「是次申請」）作擬議臨時可循環再造物料回收中心（五金）連附屬設施（為期三年）（以下簡稱「擬議用途」）。該申請涉及的地點位於新界元朗唐人新村丈量約份第 121 約地段第 984 號餘段（部分）、993 號餘段（部分）、994 號（部分）、995 號餘段、第 996 號餘段、第 997 號餘段（以下簡稱「申請地點」）。此規劃報告書提供該申請的背景及規劃理據以支持擬議用途予城規會考慮。

元朗現有可循環再造物料回收中心（五金）的業務受元朗南新發展區第二期發展計劃影響，該收地程序已於二零二五年五月展開。是次申請旨在協助遷移申請地點的現有業務，並讓業務得以繼續經營。根據唐人新村分區計劃大綱核准圖編號 S/YL-TYST/14，申請地點屬於「住宅（丁類）」地帶。正如本規劃聲明所詳述，建議用途的理據充分，理由如下：

- (一) 是次申請是為了遷移受元朗南新發展區第二期發展影響的現有運作。這次搬遷旨在確保運作的連續性，並支援一個升級、更安全、更寬敞的設施，以滿足不斷增長的基礎設施需求；
- (二) 擬議用途屬臨時性質，批准是次申請並不會損害「住宅（丁類）」地帶的長期規劃意向或申請地點及其鄰近地區的任何已規劃基建發展；
- (三) 擬議用途擬臨時利用毗鄰的棕地繼續現有業務，可在不影響長期發展的情況下優化土地資源；
- (四) 擬議用途不會被視為與周遭土地用途不相容，且對周遭區域及鄰近地區的不良視覺影響極小；
- (五) 申請人將遵守最新的「處理臨時用途及露天貯存用地的環境問題作業指引」。預計擬議用途不會對交通、環境或基礎設施造成不利影響；以及
- (六) 擬議用途不會開創不良先例，因為在同一分區計劃大綱圖上亦有類似申請。

鑑於以上及此規劃報告書所提供的詳細規劃理據，敬希城規會各委員酌情考慮批准該申請作臨時三年擬議用途。

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## 1. INTRODUCTION

### 1.1 Purpose

- 1.1.1 Pursuant to section 16 of the Town Planning Ordinance (Cap. 131), this *Planning Statement* is submitted to the Town Planning Board (hereinafter referred to as “the Board”) in support of a planning application (hereinafter referred to as “the current application”) for **Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years** (hereinafter referred to as “the proposed use”) at Lot Nos. 984 RP(Part), 993 RP (Part), 994(Part), 995 RP, 996 RP, 997 RP in D.D.121, Tong Yan San Tsuen, Yuen Long, New Territories hereinafter referred to “the application site”). The application site has an area of about 1,821m<sup>2</sup>. This Planning Statement serves to provide background information and planning justifications in support of the proposed use in order to facilitate consideration by the Board. **Figure 1** indicates location of the application site and the relevant private lots which the application site involves.
- 1.1.2 The application site currently falls within an area zoned “Residential (Group D)” (“R(D)”) on the approved Tong Yan San Tsuen Outline Zoning Plan No. S/YL-TYST/14 (hereinafter referred to as “the Current OZP”) (**Figure 2** refers). As stipulated in the Notes of the Current OZP, “...temporary use 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...”. In this connection, a planning permission is wished to be sought from the Board for the proposed use on a temporary basis for a period of three years.
- 1.1.3 Prepared on behalf of *Exact Win Limited* (hereinafter referred to as “the Applicant”), *Aikon Development Consultancy Limited* has been commissioned to prepare and submit the current application.

### 1.2 Background

- 1.2.1 The development of the Second Phase Development of Yuen Long South New Development Area (YLS NDA) is progressing, with a resumption notice gazetted on 20.2.2025, indicating the private lots currently supporting the Existing Operations will be resumed. According to the relevant Legislative Council (LegCo) paper, site formation and engineering infrastructure works for the Second Phase Development of YLS NDA would be commenced by mid-2025, subject to Finance Committee’s approval.
- 1.2.2 The existing business operation comprises recyclable collection centre (metal) by current operator (hereinafter referred to as “the Existing Operations”). The existing operator has conducted an extensive site search with a view to continuing the existing operations. According to the current operator, the application site served as brownfield site since 1993 and play a vital role in supporting the demand for open storage and recycling-related services in the region. The Existing Operations provide

essential services to local industries, facilitating operational support for the recycling-related services.

- 1.2.3 The Existing Operations are significantly affected by the Second Phase Development of the YLS NDA, with the majority of the current site's land being resumed. The remaining land is insufficient to sustain the scale and functionality of the Existing Operations, necessitating their relocation and rearrangement. An extensive site search was conducted to identify a suitable alternative location, evaluating potential sites based on proximity to the existing business network, accessibility, site size, infrastructure compatibility, and cost-effectiveness. Other sites were deemed unsuitable due to suboptimal locations, limited space, or prohibitive costs.
- 1.2.4 The application site, utilising existing brownfield sites in an area adjoining the Existing Operations, has been identified as the most suitable location for the relocation of the Existing Operations. Its proximity to the established business network along Long Hon Road facilitates a seamless transition and efficient reprovisioning of the affected operations and ensures continuity of operations with minimal disruption to the existing operational pattern.
- 1.2.5 While the Existing Operations are affected and require relocation, the existing operator would like to take this opportunity to upgrade and expand its scale at the application site in view of the growing business demand driven by infrastructural development in the region. According to the existing operator, the application site served as brownfield site since 1993, and the current facilities no longer meet modern operational standards. The proposed upgrade will provide a safer, more spacious working environment, enhancing the capacity to deliver essential services, to meet the needs of the expanding industrial sectors. The application site, approximately 1,821m<sup>2</sup>, is proportionate to support this enhanced scale compared to the current site, ensuring operational continuity with minimal disruption.
- 1.2.6 Situated within the remainder of third phase development of the NDA, the application site is well-suited for the proposed temporary use. This temporary relocation allows optimization of brownfield land, promoting efficient land resource management in the interim period before the Third Phase development commences. The proposed use allows optimization of land resources to support the immediate needs of the Existing Operations, without jeopardizing long-term development.
- 1.2.7 The location and site photos of the Existing Operations are illustrated in **Figure 4** and **Illustration 1**. The uses, locations and areas of the Existing Operations are detailed in **Table 1** below.

*Table 1: Use, Locations and Size of the Existing Operations*

	Existing Use	Existing Location	Existing Area
Site A	Recyclable Collection Centre (Metal)	Lot 995 RP, 996 RP, 997 RP, D.D.121	About 1,115m <sup>2</sup>
Total:			About 1,115m <sup>2</sup>

- 1.2.8 The Applicant intends to make use of the application site for reprovisioning of the Existing Operations. The Applicant has entered a Memorandum of Understanding with the existing operator. The Applicant and the existing operator have agreed that upon approval of the current application by the Board, the application site will be utilised by the existing operator for the proposed use during the planning approval period.

### 1.3 Objectives

- 1.3.1 The current application strives to achieve the following objectives:-

- (a) *To re-provide an recyclable collection centre on a temporary basis in serving district and territorial needs under the pressing land acquisition process for the YLS NDA development projects;*
- (b) *To fully utilise the land resources falling within "R(D)" zone for temporary uses that are beneficial to the community, viable in operation, and compatible with the character of the surrounding environment without hindering the long-term planning intention of "R(D); and*
- (c) *To induce no additional adverse environmental or infrastructural impacts on the surrounding areas.*

### 1.4 Structure of the Planning Statement

- 1.4.1 This Planning Statement is divided into 6 chapters. **Chapter 1** is the above introduction outlining the purpose and background of the current application. **Chapter 2** gives background details of the application site in terms of the current land-use characteristics and neighbouring developments. Planning context of the application site is reviewed in **Chapter 3** whilst **Chapter 4** provides details of the proposed use. A full list of planning justifications is given in **Chapter 5** whilst **Chapter 6** summarises the concluding remarks for the proposed use.

## **2. SITE PROFILE**

### **2.1 Location and Current Conditions of the Application Site**

2.1.1 The application site is located in Tong Yan San Tsuen and is accessible via Long Hon Road. The application site is paved with concrete and with some temporary structures erected for existing brownfield operations, including recyclable collection centre and open storage. There are no existing trees and river channels within the application site. **Illustration 1** indicate the current conditions of the Existing Operations whilst **Illustration 3** indicates the current condition of the application site and surrounding areas.

2.1.2 The aerial photo (No. CN2956 and CN3584) taken in 1992 and 1993 respectively, provide evidence of the application site's history. As shown in **Illustrations 2**, the application site was a piece of paved non-agricultural land with brownfield activities observed since 1993. There is no substantial change of use since the gazettal of the first Development Permission Area Plan and the site continues to be utilized for brownfield activities.

### **2.2 Surrounding Land-use and Characteristics**

2.2.1 The surrounding areas of the application site are predominately occupied by open storage, warehouses and temporary structures, tree clusters and vegetated areas.

### 3. PLANNING CONTEXT

#### 3.1 Statutory Planning Context

3.1.1 The application site falls within an area zoned “R(D)” on the Current OZP (**Figure 3** refers). According to the Notes of the Current OZP, “R(D)” zone is intended primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings. It is also intended for low-rise, low-density residential developments subject to planning permission from the Town Planning Board.

3.1.2 As stipulated in the Notes of the Current OZP, “...temporary use 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...”. In this connection, the applicant wishes to seek planning permission from the Board for the proposed use on a temporary basis of three years.

#### 3.2 Similar Applications

3.2.1 There is a similar application within the “R(D)” zone on the Tong Yan San Tsuen OZP. Details of the similar applications are tabulated in **Table 2** below.

*Table 2: Similar Planning Applications in the Past Five Years*

Application No.	Proposed Use(s)	Zoning(s)	Decisions (Date)
A/YL-TYST/1234	Proposed Temporary Warehouse and Open Storage of Construction Materials for a Period of 3 Years	" R(D) "	Approved with condition(s) on a temporary basis (10/11/2023)

#### 3.4 Town Planning Board Guidelines (TPB PG-No. 13G)

3.4.1 The application site falls under Category 3 areas in the Town Planning Board Guidelines for Application for Open Storage and Port Back-up Uses under Section 16 of the Town Planning Ordinance (TPB PG-No. 13G) promulgated by the Board in April 2023.

3.4.2 According to the TPB PG-No.13G, Category 3 areas are those outside the Category 1, 2 and 4 areas. Within these areas, “existing” and approved open storage and port back-up uses are to be contained and further proliferation of such uses is not acceptable. Applications falling within Category 3 areas would normally not be favourably considered unless the applications are on sites with previous planning approvals (irrespective of whether the application is submitted by the applicant of previous approval or a different applicant). In that connection, sympathetic consideration may be given if genuine efforts have been demonstrated in compliance with approval conditions of the previous planning applications and/or relevant

technical assessments/proposals have been included in the fresh applications, if required, to demonstrate that the proposed uses would not generate adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas. Subject to no adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions, planning permission could be granted on a temporary basis up to a maximum period of 3 years.

### **3.3 Yuen Long South Revised Recommended Outline Development Plan**

- 3.4.3 While the application site falls within areas zoned “Green Belt (1)” (“GB(1)”), “Residential – Zone 5”, and an area shown as ‘Road’ and ‘River Channel’ on the Yuen Long South (YLS) Revised Recommended Outline Development Plan (RODP) promulgated in May 2020, it is pertinent to note that the entire site has been paved for existing brownfield activities purposes and there is no existing river within the application site. The current application seeks to relocate Existing Operations to adjoining brownfield area and continue existing operations, should not involve substantial changes and induce significant disruption to the surrounding areas.
- 3.4.4 The application site falls within the work boundary of the remainder of Third Phase Development of the NDA. It is anticipated that allowing the current application for a temporary period of three years will not jeopardize the implementation of the planned or committed development in YLS.

## 4. THE DEVELOPMENT PROPOSAL

### 4.1 Site Configuration and Layout

- 4.1.1 The proposed use of the application site (i.e. Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities) is to facilitate the relocation of the Existing Operations affected by the Second Phase Development of the YLS NDA. As agreed by the Applicant and the existing operator, should the current application be approved by the Board, the existing operations will be relocated to the application site during the planning approval period.
- 4.1.2 The application site has a total area of about 1,821m<sup>2</sup>. Access to the application site will be provided through an ingress/egress point (in about 11m) located at the eastern boundary (**Figure 3** refers), adjacent to Long Hon Road. Should the current application be approved, the existing fencing will be adjusted, and new 3m fencing will be erected along the periphery of the application site.
- 4.1.3 The application site consists of 6 temporary structures, with a maximum height of 7m (not more than 2-storey), providing a total gross floor area (GFA) of about 267m<sup>2</sup>. There are provisions of two parking spaces for private cars and a L/UL bay for medium/heavy goods vehicles (M/HGVs) within the application site. The Indicative Layout Plan is shown in **Figure 3** whilst the key development parameters for the proposed use are detailed in **Table 3** and **Table 4**.
- 4.1.4 The proposed use involves the collection, storage, sorting, packing, and baling of metal recyclables for recycling purposes. The recyclable collection centre (i.e. Structure S3) serves as a sheltered venue for allocation, simple processing, and storage of metal recyclables before further transport to other locations. No rural workshop activities, such as washing, burning, melting and breaking of metal, will be carried out at the application site.
- 4.1.5 All activities of the proposed use will only be confined within the application site without affecting the neighbouring uses. The operation hours of the proposed use are from 9:00a.m. to 6:00p.m. from Mondays to Saturdays and there will be no operations on Sundays and public holidays. It is estimated that the application site would be able to accommodate not more than 2 staff. As no shopfront is proposed, visitor is not anticipated at the application site.
- 4.1.6 Regarding the implementation of the development proposal, the Applicant stands ready to apply to the Lands Department for Short Term Waiver (STW) for permitting the structures to be erected or to regularise any irregularities on site, once the current application is approved.



*Table 3: Key Development Parameters*

<b>Proposed Use</b>	Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years
<b>Operation Hours</b>	From 9:00a.m. to 6:00 p.m. from Mondays to Saturdays (Excluding Sundays and Public Holidays)
<b>Site Area</b>	1,821m <sup>2</sup>
<b>Covered Area</b>	About 246m <sup>2</sup> (About 14%)
<b>Uncovered Area</b>	About 1,575m <sup>2</sup> (About 86%)
<b>Temporary Structure</b> No(s). No. of Storey Maximum Height Total Floor Area	6 Not More than 2 Storey Not More Than 7m About 267m <sup>2</sup>
<b>No. of Parking Spaces</b> Private Car (5m(L) x 2.5m(W))	2
<b>No. of Loading/Unloading (L/UL) Bays</b> M/HGVs (11m(L) x 3.5m(W))	1

*Table 4: Details of the Proposed Structures*

<b>Structure/ Container No.</b>	<b>Proposed Use</b>	<b>Floor Area (About) (m<sup>2</sup>)</b>	<b>No. of Storeys</b>	<b>Max. Height (About) (m)</b>
S1	Portable Toilet	9	1	3
S2	Ancillary Site Office	21	1	3.5
S3	Recyclable Collection Centre/General Storage	182	1	7
S4	Portable Toilet	9	1	3
S5	Ancillary Site Office	42	2	7
S6	Meter Room	4	1	3

## 4.2 Proposed Traffic Arrangement

- 4.2.1 The application site can be accessed via Long Hon Road. The proposed use features a 11m-wide access point, which is well-suited for the proposed types of vehicles. This entry supports safe and efficient vehicle maneuvering, minimizing the risk of congestion or accidents.
- 4.2.2 Within the application site, two parking spaces for private cars and an L/UL bay for M/HGVs are provided. Sufficient space is provided for vehicles to maneuver smoothly within the application site to ensure that no vehicle will be allowed to queue back to or reverse onto/from the application site to the public road.
- 4.2.3 M/HGVs will be deployed for the transportation of vehicles into/out of the application site during non-peak hours (i.e. between 10:00 and 17:00). The breakdown of estimated trip generation/attraction of proposed development at AM and PM peak hours are provided at **Table 5**.

Table 5: Estimated Trip Generation/Attraction

Estimated Trip Generation/Attraction					
Time Period	PC		M/HGV		2-Way Total
	In	Out	In	Out	
Trips at AM peak per hour (09:00 – 10:00)	1	0	0	0	1
Trips at PM peak per hour (17:00 – 18:00)	0	1	0	0	1
Average trip per hour (10:00 – 17:00)	2	2	2	2	8

- 4.2.4 The estimated vehicular trips generated/attracted by the proposed development are minimal, as such, adverse traffic impact to the surrounding road network should not be anticipated.
- 4.2.5 The proposed use is designed to meet regulatory standards and optimise operational efficiency without substantially impacting local traffic. It is confirmed that the proposed use, strategically situated near key roadways, is designed for low-intensity operations, thus ensuring minimal impact on local traffic.
- 4.2.6 Servals operational arrangements are proposed to ensure minimal traffic impact:
- (a) Low-intensity Operation: The proposed use is designed for low-intensity operations, focusing on infrequent, specialised shipments. This operational model inherently limits the number of vehicle trips to and from the application site;
  - (b) Operating Hours: The proposed use will operate from 9:00 AM to 6:00 PM, Monday through Saturday, specifically timed to reduce disruptions to local traffic flow;
  - (c) Vehicle Management: The operation will predominantly all scheduled to operate outside peak traffic times to mitigate potential congestion; and
  - (d) Safety and Design: The proposed use will feature a 11-meter-wide access point to ensure safe vehicle manoeuvres, one L/UL bay and two private car parking spaces.

### 4.3 Landscape and Visual Consideration

- 4.3.1 The application site is paved with concrete and have been utilized for brownfield operations for existing use since 1993. No existing trees are identified on the application site. The application site has no amenity value at present and the proposed development would induce no significant landscape impact.
- 4.3.2 It is proposed that the application site will be fenced off with a 3m boundary fencing to prevent direct visual contact from outside. This design ensures compatibility with the surrounding land uses, which predominantly consists of open storage and warehouses as well as temporary structures. As a result, the proposed use is expected to have no or minimal adverse visual impacts on the surrounding land uses and the overall neighborhood.

#### **4.4 Environmental Consideration**

- 4.4.1 All activities of the proposed use will only be confined within the application site without affecting the neighboring uses. The Applicant will strictly follow Environmental Protection Department (EPD)'s latest "Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites (CoP)" and comply with all environmental protection/ pollution control ordinances, during construction and operation stages of the proposal, should the application be approved. As such, no adverse environmental impact and misuse of the proposed use is anticipated.
- 4.4.2 During the construction stage, the applicant will follow the good practices stated in Professional Persons Environmental Consultative Committee Practice Notes (ProPECC PN) 2/23 to minimize the impact on the nearby watercourse water quality. Runoff generated during the construction phase will be directed into storm drains via properly designed sand and silt removal systems, including sand traps, silt traps, and sediment basins. These silt removal facilities, along with channels and manholes, will be regularly maintained, with silt and grit being cleared at the beginning and end of each rainstorm to ensure their continuous functionality.

#### **4.5 Provision of Drainage Facilities**

- 4.5.1 The Application Site is flat and hard paved and there are existing public drainage pipe running to the southern and eastern periphery of the application site. The existing drainage pipe connects to the public drain. The Current Application would make use of existing drainage network installed. Given that the proposed use would be the same as existing use, it is anticipated that the proposed use would not give rise to any drainage impact to the adjoining areas. Should the Current Application be approved, the Applicant is willing to submit a detailed drainage proposal together with a thorough investigation of the existing drainage system and implement such to the satisfaction of the Board and the concerned Government departments.

## 5. PLANNING JUSTIFICATIONS

### 5.1 Reprovisioning of the Existing Operations Affected by the Development of YLS NDA at the Most Suitable Location

5.1.1 As outlined in Section 1.2.1 and 1.2.3, the Existing Operations, comprising recyclable collection centre along Long Hon Road, are significantly affected by the Second Phase Development of the YLS NDA. A majority of the current site's land will be resumed, rendering the remaining area insufficient to sustain the scale and functionality of the Existing Operations, and immediate relocation is necessary. An extensive site search was conducted to identify a suitable alternative location, evaluating potential sites based on proximity to the existing business network, accessibility, site size, infrastructure compatibility, and cost-effectiveness. Other sites were deemed unsuitable due to suboptimal locations, limited space, or prohibitive costs. The application site, adjacent to the Existing Operations, is identified as the most suitable location to ensure a seamless transition and efficient reprovisioning of the affected operations and maintain operational continuity within the established business network along Long Hon Road.

5.1.2 In addition, the current application seeks to temporarily utilize the application site, which is adequately sized to accommodate the growing recycling business in recent years. Operating a recyclable collection centre requires an accessible location for efficient transportation and a sizeable area for accommodating the materials before they are further transported. However, most urban land has already been developed, and greenfield sites in rural areas are often subject to sensitive environmental concerns, making it nearly impossible to find suitable brownfield sites for such interim uses. Therefore, the application site, previously used for open storage and recyclable collection centre, is considered ideal for the proposed uses.

3.4.5 While the Existing Operations are affected and require relocation, the existing operator would like to take this opportunity to upgrade and expand their scale at the application site in view of the growing business demand driven by infrastructural development in the region. According to the current operator, the application site served as a brownfield site since 1993, and the current facilities no longer meet modern operational standards. The proposed upgrade will provide a safer, more spacious working environment, enhancing the capacity to deliver essential services, to meet the needs of the expanding industrial sectors. The application site, approximately 1,821m<sup>2</sup>, is proportionate to support this enhanced scale compared to the current site, ensuring operational continuity with minimal disruption.

### 5.2 Not Jeopardizing the Planning Intention of "R(D)" Zone

5.2.1 Considering the close proximity of various adjacent open storage and warehouse uses to the application site, the planning intention of "R(D)" zone may hardly be materialized in short term. In contrast, approving the proposed temporary use under the current application would facilitate ongoing and flexible adaptation to meet the changing demands of land use. The temporary nature of the proposed use under the current application will by no means jeopardize the long-term planning intention of

the “R(D)” zone, considering that the proposed use under the current application is only being applied for a period of 3 years.

### **5.3 Not Jeopardizing the Long-Term Development**

- 5.3.1 While the application site falls within areas zoned “Green Belt (1)” (“GB(1)”), “Residential – Zone 5” and an area shown as ‘Road’ and ‘River Channel’ on the Yuen Long South (YLS) Revised Recommended Outline Development Plan (RODP) promulgated in May 2020, it is pertinent to note that the entire application site including the subject “GB(1)” area has been paved for brownfield activities purposes and there is no existing river channel within the application site. The current application seeks to relocate Existing Operations to adjoining brownfield area and continue existing operations, should not involve substantial changes and induce significant disruption to the surrounding areas.
- 5.3.2 Located within the remainder of third phase development of the NDA, the temporary use of the brownfield site optimizes land resources in the interim period before the Stage 4 works commence, supporting immediate operational needs without compromising the long-term development objectives of the YLS NDA.
- 5.3.3 The proposed use in the current application is only being applied in temporary nature for a period of 3 years, therefore it should not jeopardize nor pre-empt the future development of the “Green Belt (1)” (“GB(1)”), “Residential – Zone 5” zones, “Road” and “River Channel”. The proposed development can be an optimum use before population intake and to allow the application site continuously and flexibly meet the demands of recycling business and operation.
- 5.3.4 Furthermore, it is the mere fact that such period of the planning approval could be adjusted by the Board to a period of 3 years or less, and that a fresh section 16 planning application is required upon its expiry. Given the proposed use are temporary in nature, the Board may review and reconsider the permission for the proposed use at the application site every 3 years. In this connection, the temporary nature of the proposed uses would not in any sense pose any constraints to jeopardize nor pre-empt the long-term development under any circumstances.

### **5.4 Not Compatible with Land Uses of the Surrounding Areas**

- 5.4.1 The surrounding areas of the application site are in rural inland plain landscape character and predominately occupied by open storage, warehouses, temporary structures, tree clusters and vegetated areas. The proposed use is therefore not considered to be incompatible with the land uses of the surrounding areas. The proposed use is considered to fully commensurate with its local geographical settings and is ideal to attain utmost land use maximization without giving rise to detrimental impacts on the surrounding areas.

## **5.5 No Adverse Traffic Impact**

- 5.5.1 The estimated vehicular trips generated/attracted by the proposed development are minimal, as such, adverse traffic impact to the surrounding road network should not be anticipated. The proposed use is designed to meet regulatory standards and optimise operational efficiency without substantially impacting local traffic. It is confirmed that the proposed use, strategically situated near key roadways, is designed for low-intensity operations, thus ensuring minimal impact on local traffic.

## **5.6 No Adverse Environmental Impact**

- 5.6.1 All activities of the proposed use will only be confined within the application site without affecting the neighboring uses, and no storage of dangerous goods would be carried out with the application site. The Applicant is committed to implementing good site practices and adhering to the latest "CoP" and comply with all environmental protection/ pollution control ordinances, throughout the construction and operation stages of the proposed development, should the application be approved. It is ensured that the proposed development will not generate any unacceptable environmental impacts (including air quality, noise, water quality and waste management), during both the construction and operation phases. Therefore, no adverse environmental impact or misuse of the proposed use is anticipated.
- 5.6.2 During the construction stage, the applicant will follow the good practices stated in Professional Persons Environmental Consultative Committee Practice Notes (ProPECC PN) 2/23 to minimize the impact on the nearby watercourse water quality. Runoff generated during the construction phase will be directed into storm drains via properly designed sand and silt removal systems, including sand traps, silt traps, and sediment basins. These silt removal facilities, along with channels and manholes, will be regularly maintained, with silt and grit being cleared at the beginning and end of each rainstorm to ensure their continuous functionality.

## **5.7 No Adverse Drainage Impact**

- 5.7.1 The Application Site is flat and hard paved and there are existing public drainage pipe running to the southern and eastern periphery of the application site. The existing drainage pipe connects to the public drain. The Current Application would make use of existing drainage network installed. Given that the proposed use would be the same as existing use, it is anticipated that the proposed use would not give rise to any drainage impact to the adjoining areas. Should the Current Application be approved, the Applicant is willing to submit a detailed drainage proposal together with a thorough investigation of the existing drainage system and implement such to the satisfaction of the Board and the concerned Government departments.
- 5.7.2 Since there will be no substantial changes in the nature and operation of the proposed use compared to the current use, no significant drainage impact is anticipated.

## **5.8 Not Setting an Undesirable Precedent**

- 5.8.1 Considering the similar applications being approved by the Board on the same OZP as discussed in **Section 3.2**, no undesirable precedent is expected should the current application be approved.

## 6. CONCLUSION

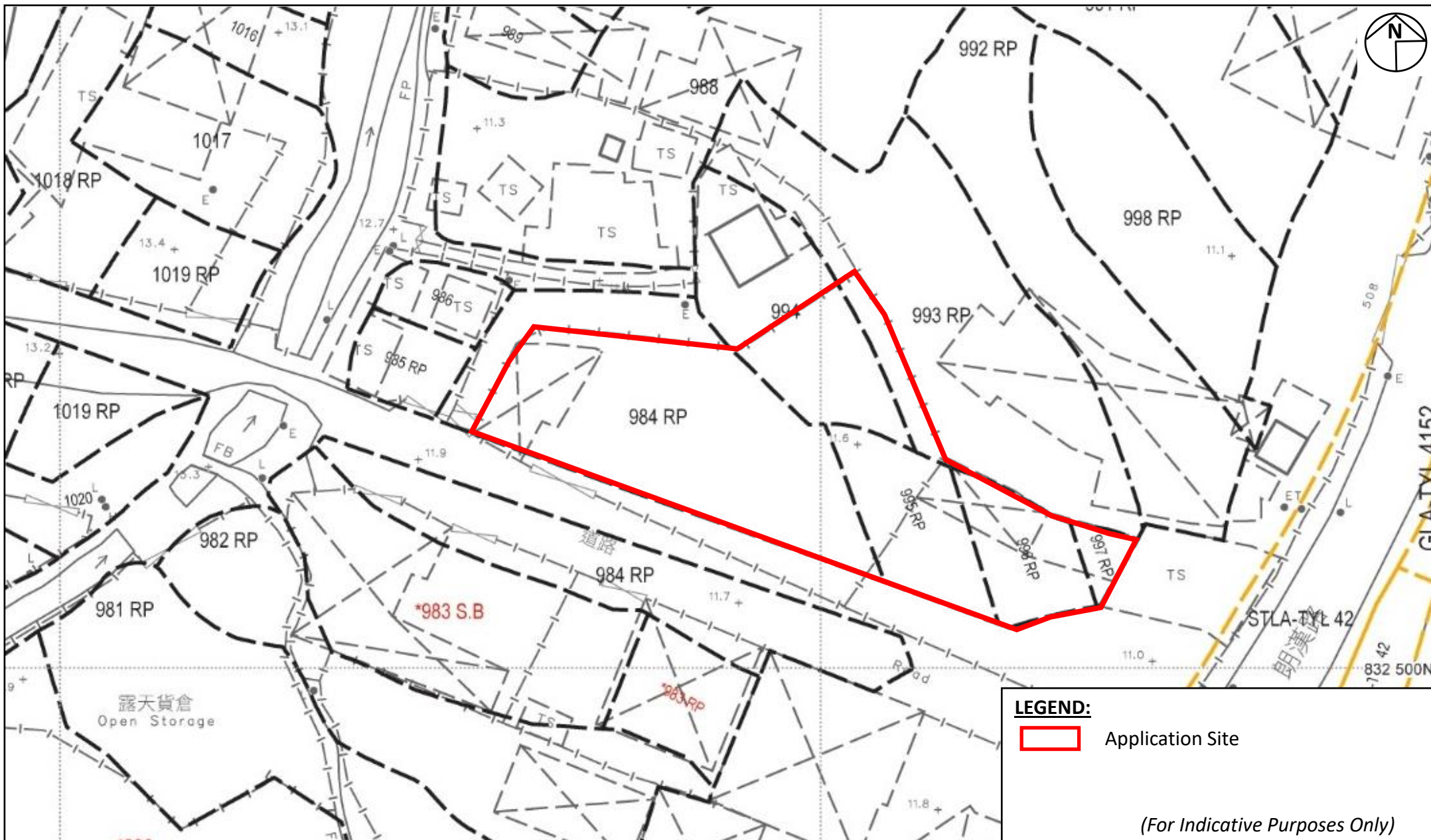
- 6.1 This Planning Statement is submitted to the Board in support of the current application for the proposed use at the application site. This Planning Statement serves to provide background information and planning justifications in support of the proposed use to facilitate consideration by the Board.
- 6.2 The existing business operation at Yuen Long for recyclable collection centre (metal) was affected by the Second Phase Development of YLS NDA, and land resumption process commenced in May 2025. The current application seeks to facilitate the relocation of existing business operations at the application site and allow continual operations. The application site falls with an area zoned “Residential (Group D)” (“R(D)”) on the approved Tong Yan San Tsuen Outline Zoning Plan No. S/YL-TYST/14. As detailed throughout this Planning Statement, the proposed use is well justified on the grounds that:-
- (a) *The current application is submitted for the relocation of existing operations affected by the second phase of the YLS NDA development. This relocation aims to ensure operational continuity and support an upgraded, safer, and more spacious facility to meet growing infrastructural demands;*
  - (b) *The proposed use is temporary in nature. Approval of this application would not jeopardize the long-term planning intention of the “R(D)” zone or any planned infrastructural developments at the application site and its neighborhood;*
  - (c) *The proposed use intends to temporarily utilize the adjoining brownfield area to continue existing operations, allowing for the optimization of land resources without compromising long-term development;*
  - (d) *The proposed use is not considered incompatible with the surrounding land uses and has minimal to no adverse visual impacts on the surrounding area and neighborhood;*
  - (e) *The applicant will adhere to the latest ‘Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites’. No adverse traffic, environmental, or infrastructural impacts arising from the proposed use are anticipated; and*
  - (f) *The proposed use will not set an undesirable precedent as similar application is identified on the same OZP.*
- 6.3 In view of the above and the list of detailed planning justifications in the Planning Statement, it is sincerely hoped that the Board will give sympathetic consideration to approve the current application for the proposed use for a temporary period of 3 years.



## List of Figures

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Figure 1	Extract of Lot Index Plan (No. ags_ S00000143572_0001)
Figure 2	Extract of Approved Tong Yan San Tsuen Outline Zoning Plan No. S/YL-TYST/14
Figure 3	Indicative Layout Plan
Figure 4	Indicative Plan Showing the Location of Existing Operations



**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

Extract of Lot Index Plan  
 (No. ags\_S00000143572\_0001)

**Figure:**

1

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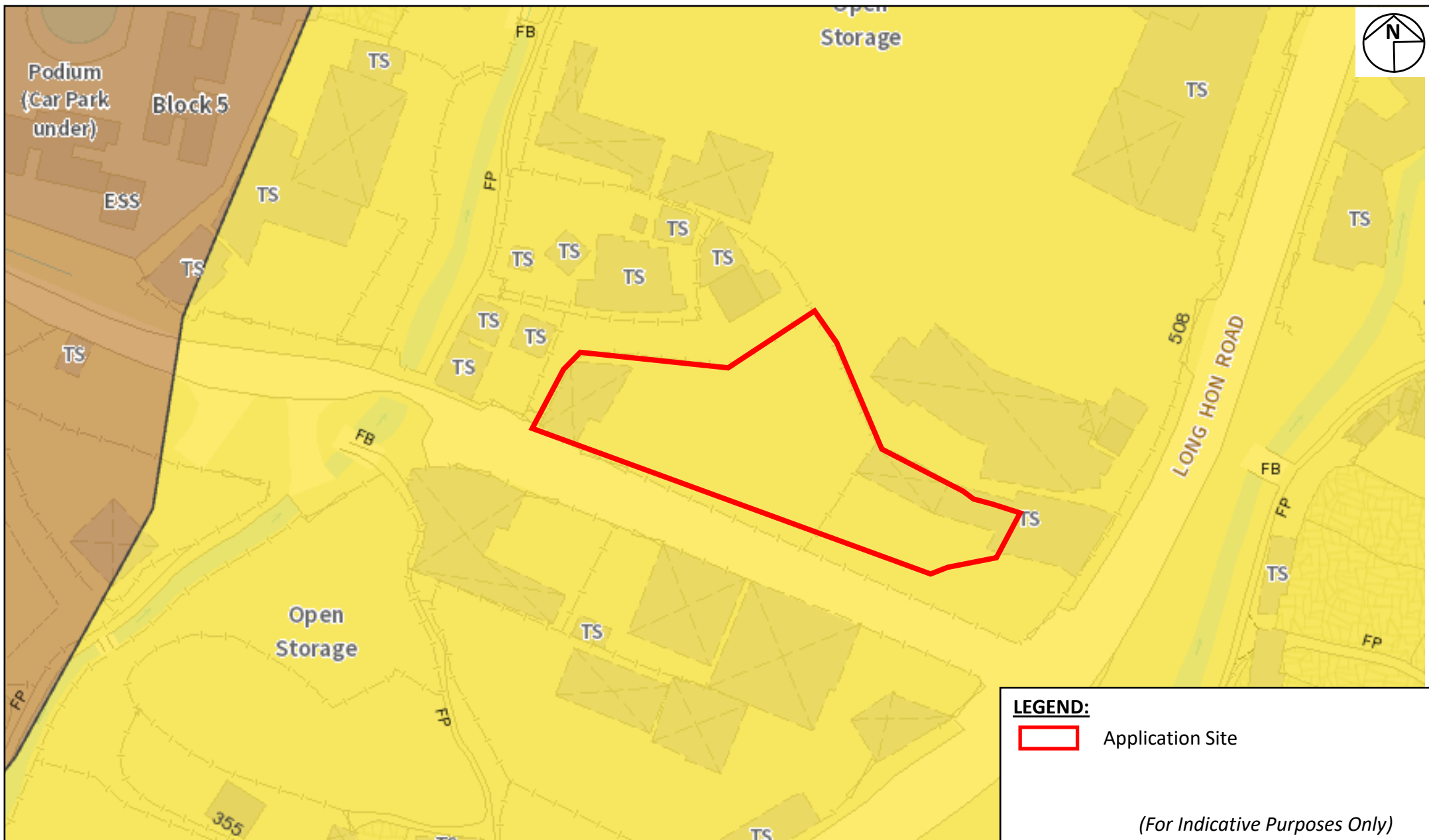
**Date:**

Jul 2025

Ref.: ADCL/PLG-10322-R001/F001



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**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

Extract of Approved Tong Yan San Tsuen Outline Zoning Plan No. S/YL-TYST/14

Ref.: ADCL/PLG-10322-R001/F002

**Figure:**

2

**Scale:**

Not to Scale

**Date:**

Jul 2025



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**DEVELOPMENT PARAMETERS**

APPLICATION SITE : 1,821 SQ.M. (ABOUT)  
COVERED AREA : 246 SQ.M. (ABOUT)  
UNCOVERED AREA : 1,575 SQ.M. (ABOUT)  
GROSS FLOOR AREA : 267 (ABOUT)

**PARKING AND LOADING/UNLOADING PROVISION**

PARKING SPACE (PC) : 2 NOS. (5 M(L) X 2.5 M(W))  
L/UL SPACE (M/HGV) : 1 NOS. (11 M(L) X 3.5 M(W))

**STRUCTURE****USES**

S1	PORTABLE TOILET
S2	ANCILLARY SITE OFFICE
S3	RECYCLABLE COLLECTION CENTRE/ GENERAL STORAGE
S4	PORTABLE TOILET
S5	ANCILLARY SITE OFFICE
S6	METER ROOM
	TOTAL

**COVERED AREA  
(ABOUT)**

9 SQ.M.  
21 SQ.M.  
182 SQ.M.  
9 SQ.M.  
21 SQ.M.  
4 SQ.M.  
246 SQ.M.

**GFA  
(ABOUT)**

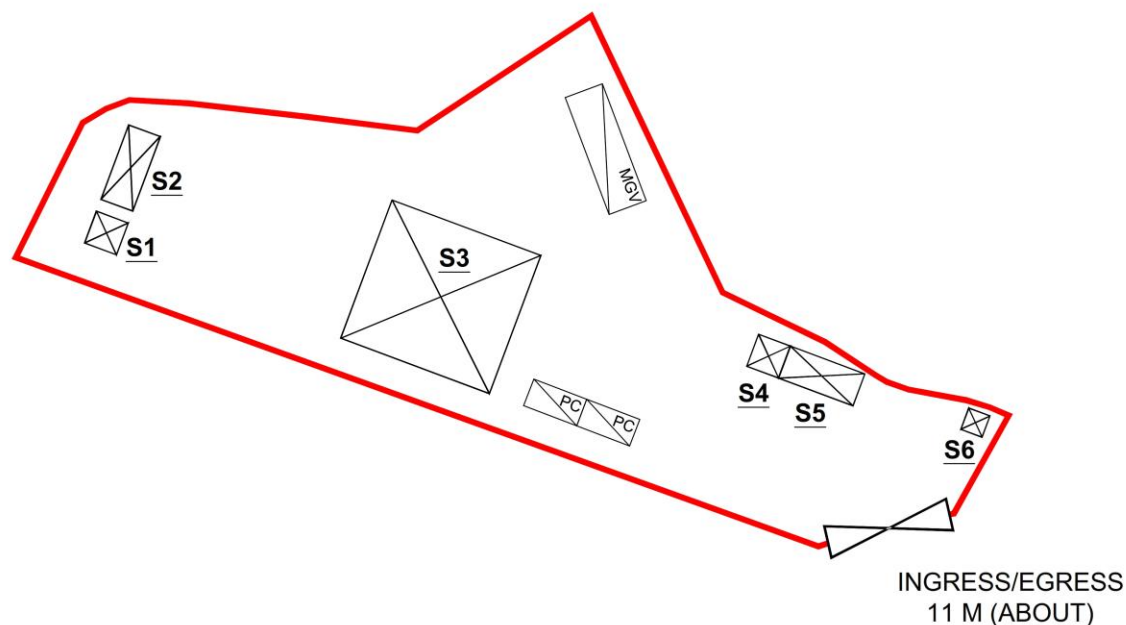
9 SQ.M.  
21 SQ.M.  
182 SQ.M.  
9 SQ.M.  
42 SQ.M.  
4 SQ.M.  
267 SQ.M.

**BUILDING HEIGHT**

3M (NOT MORE THAN) (1-STOREY)  
3.5M (NOT MORE THAN) (1-STOREY)  
7M (NOT MORE THAN) (1-STOREY)  
3M (NOT MORE THAN) (1-STOREY)  
7M (NOT MORE THAN) (2-STOREY)  
3M (NOT MORE THAN) (1-STOREY)

**LEGEND**

-  APPLICATION SITE BOUNDARY
-  PROPOSED STRUCTURE
-  PARKING SPACE (PRIVATE CAR)
-  L/UL SPACE (M/HGV)
-  INGRESS/EGRESS (11M-WIDE)

**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

Indicative Layout Plan

**Figure:**  
3

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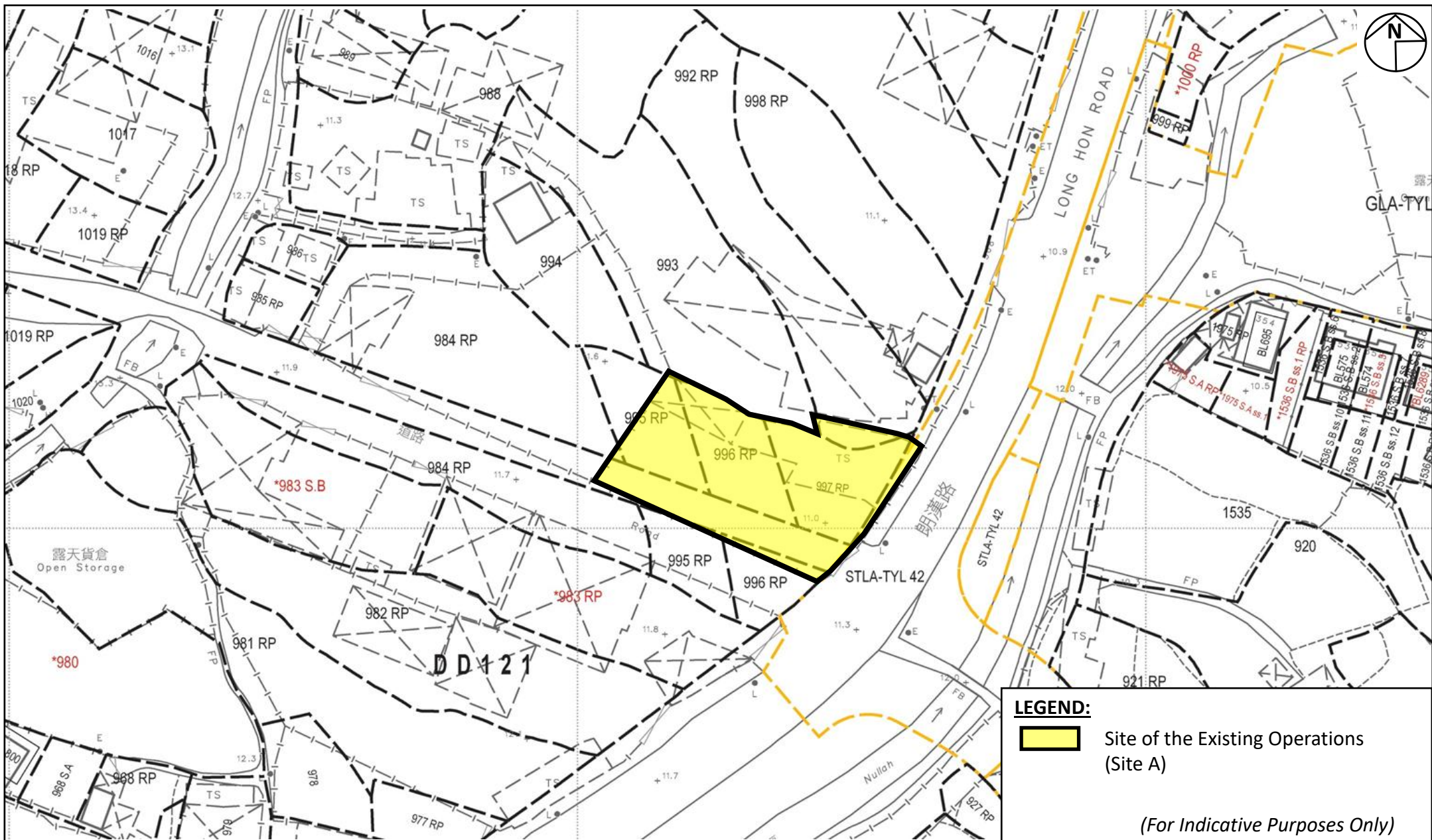
**Date:**  
Aug 2025

Ref.: ADCL/PLG-10322-R001/F003



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**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

Indicative Plan Showing the Location of Existing Operations

**Figure:**

4

**Scale:**

Not to Scale

**Date:**

Jul 2025



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Ref.: ADCL/PLG-10322-R001/F004

## List of Illustration

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Illustration 1	Photographic Record of Existing Operations (Site A)
Illustration 2	Aerial Photos (Nos. CN2956 and CN3584) taken on 17.06.1992 and 19.06.1993
Illustration 3	Existing Condition of the Application Site and Surrounding Areas





**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

Photographic Record of Existing Operations (Site A)

Ref.: ADCL/PLG-10322-R001/I001

**Illustration:**

1

**Scale:**

Not to Scale

**Date:**

Jul 2025



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**Aerial Photo No. CN2956**

(Taken on 17.06.1992)



**Aerial Photo No. CN3584**

(Taken on 19.06.1993)



**LEGEND:**



Application Site



Site of the Existing Operations  
(Site A)

*(For Indicative Purposes Only)*

**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

Aerial Photos (Nos. CN2956 and CN3584) taken on 17.06.1992 and 19.06.1993

**Illustration:**

2

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**Date:**

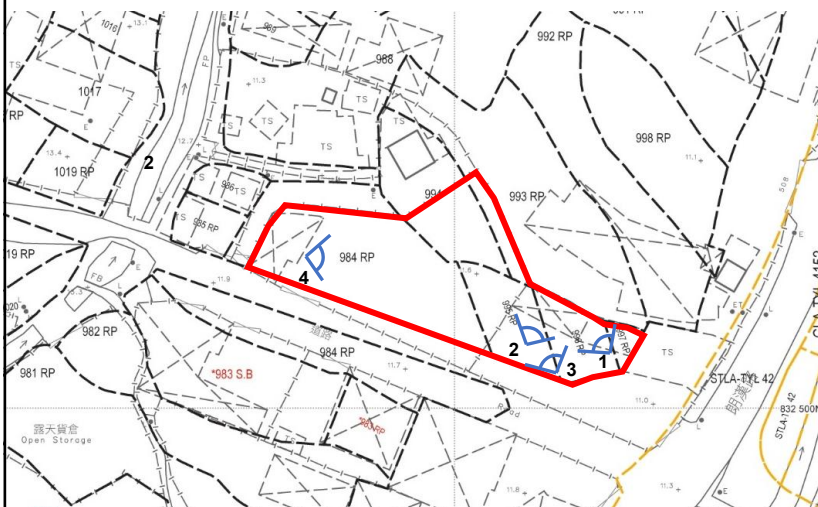
Jul 2025

Ref.: ADCL/PLG-10322-R001/I002





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**LEGEND:**

 The Application Site  Viewpoint

(For Identification Only)

**Project:**

Section 16 Planning Application for Proposed Temporary Recyclable Collection Centre (Metal) with Ancillary Facilities for a Period of 3 Years at Various Lots in D.D. 121, Tong Yan San Tsuen, Yuen Long, New Territories

**Title:**

### Existing Condition of the Application Site and Surrounding Areas

Ref.: ADCL/PLG-10322-R001/I003

**Illustration:**  
3

**Scale:**  
Not to Scale

**Date:**  
Jul 2025



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