



**LCH Planning and Development
Consultants Limited**

Our Ref.: PD2601002/01
Your Ref.:

23 February 2026

By Hand

Town Planning Board Secretariat
15/F, North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

Dear Sir/ Madam,

**APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE
PROPOSED TEMPORARY SHOP AND SERVICES WITH ANCILLARY FACILITIES
AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS AT THE
REMAINING PORTION OF SECTION A OF LOT NO. 477 IN D.D. 90, MAN KAM TO**

We, LCH Planning & Development Consultants Limited, act on behalf of Applicant, to submit the aforesaid application to the Town Planning Board.

In order to facilitate your department to consider the application, we hereby attach the following documents for your information and consideration:

- i. A Signed Original Copy of the Application Form
- ii. 4 Hardcopies of Planning Statement Report with Annexes
- iii. Signed Authorisation Letter from the Applicant
- iv. Copy of Land Registration Record
- v. Particulars of Application and Authorised Agent
- vi. Checklist of Documents

Should you require further information or have any query, please feel free to contact the undersigned or Cherie Lee at [REDACTED].

Yours faithfully,
For and on behalf of
LCH Planning & Development Consultants Limited


Junior Ho
Director

Encl.
c.c. the Applicant



**LCH Planning and Development
Consultants Limited**

Section 16 Application for Proposed Temporary Shop and Services (Retail Shop) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at the Remaining Portion of Section A of Lot No. 477 in Demarcation District 90, Man Kam To

Planning Statement Report

Prepared by
Planning Consultant : LCH Planning & Development
Consultants Limited

February 2026
Report : Version 1.0



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 Proposed Temporary Shop and Services (Retail Shop) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years (“**the Proposed Development**”) at the Remaining Portion of Section A of Lot No. 477 in Demarcation District 90, Man Kam To (“**the Application Site**”).

The Application Site falls within an area of “Agriculture” zone on the Approved Man Kam To Outline Zoning Plan No. S/NE-MKT/7. The Application Site can be directly accessible via the Lin Ma Hang Road. The site area is about 181 sq.m., with a total built over area of about 70 sq.m. There will be 3 various temporary structures of not more than 4 metres high for retail shops, toilet, ancillary office and storage. There will be one private car cum van-type light goods vehicle parking space of about 5 m x 2.5 m. The operation hours are from 8am to 8pm, Monday to Sunday (including Public Holidays). There will be land filling for a depth of not more than 0.3 metres.

In view that only a shop/ convenience store will be available in the vicinity, this Application hopes to address the demand of retail space for the villagers and workers in the vicinity. The Proposed Development will not jeopardize the long-term planning intention of “Agriculture” zone. There will be no adverse traffic, visual, landscape and environment impact as well.

There is a precedent approved planning application for temporary shop and services use in the subject “Agriculture” zone under the same outline zoning plan. Similar applications which have been approved recently are also identified within the “Agriculture” zone of the North East New Territories New Development Areas to support this planning application.

In view of the above justification, 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，就丈量約份第 90 約地段第 477 號 A 分段餘段(「申請地點」)向城市規劃委員會(下稱「城規會」)申請作擬議臨時商店及服務行業連附屬設施及填土工程(為期 3 年)(下稱「擬議發展」)。

申請地點現時於《文錦渡分區計劃大綱核准圖編號 S/NE-MKT/7》劃作「農業」地帶。申請地點可經蓮麻坑路直接到達。地盤面積約 181 平方米。總樓面面積約 70 平方米。申請地點有 3 座不高於 4 米的臨時構築物用作商店、廁所及附屬辦公室及儲物。申請地點提供 1 個 5 米 x 2.5 米的私家車/客貨車停車位。申請地點的營運時間為星期一至星期日上午 8 時至晚上 8 時，包括公眾假期。申請地點的填土深度將不多於 0.3 米。

有鑑於附近地區相繼發展將只有一間商店服務村民及鄰近員工，擬議發展冀提供零售服務以支持地區需要。擬議發展不會影響「農業」地帶的長遠規劃意向，亦不會對交通、視覺、景觀和環境造成不利影響。

根據同一分區計劃大綱核准圖，於有關「農業」地帶內，已有一宗獲批的臨時店鋪及服務用途規劃申請作為先例。此外，新界東北的「農業」地帶亦有類似的先例，批准作臨時店鋪及服務的規劃申請，顯示這臨時用途符合相關區域的發展趨勢及規劃方向。是次申請可參照上述先例，理據充分，具可行性及政策依據。

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 Applicant to prepare and submit on its behalf this planning application for a proposed temporary shop and services (retail store) for a period of three years and filling of land (hereinafter referred to as the “**Proposed Development**”) in Man Kam To (**Figure 1**) (hereinafter referred to as the “**Application Site**”) to the Town Planning Board (“**the Board**”) under Section 16 of the Town Planning Ordinance (“**the Ordinance**”).
- 1.1.2 The Application Site falls within an area designated as “Agriculture” (“**AGR**”) zone on the Approved Man Kam To Outline Zoning Plan No. S/NE-MKT/7 (“**the OZP**”) (**Figure 3**). According to the OZP, ‘shop and services’ use is neither a Column 1 nor Column 2 uses. Nevertheless, temporary use or development not exceeding a period of three years requires permission from the Town Planning Board.

2 THE APPLICATION SITE AND SURROUNDINGS

2.1 Condition of the Application Site

- 2.1.1 The Application Site covers a total of about 181 square metres (“sq. m.”). The Application Site is currently fenced with some existing structures.
- 2.1.2 The Application Site is abutting Lin Ma Hang Road to the north and in proximity to the Hong Kong Seeing Eye Dog Training School. It is also situated in the east of the existing Man Kam To Food Inspection Facilities and to the northeast of the Man Kam To Control Point.



Diagram 1 Application Site from Lin Ma Hang Road
(Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

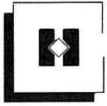


Diagram 2 Road going to the Man Kam To Food Inspection Facilities
(Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

2.1.3 **Figure 1** illustrates the location of the Application Site and its immediate vicinity.

2.2 Land Status

2.2.1 The Application Site falls within the Remaining Portion of Section A of Lot No. 477 in Demarcation District 90, Man Kam To (“**the Lot**”) (**Figure 2**).

2.3 Surrounding Context

2.3.1 Man Kam To is a sub-urban area, predominantly occupied by agricultural land and village clusters. It is located in the northeast of the New Territories and next to the Shenzhen River. Man Kam To Control Point is situated within the Frontier Closed Area which allows visitors to travel between Mainland and Hong Kong. There are two major roads (Man Kam To Road and Lin Ma Hang Road) in Man Kam To, and the major transportation mode is by minibus connecting Man Kam To to Sheung Shui MTR station and Lin Ma Hang. Refer to **Figure 4** for surrounding context.

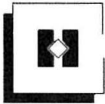
2.3.2 The Application Site is in the north of San Uk Ling, in the east of Muk Wu, and in the west of Lo Shue Ling. There are two village clusters in Muk Wu and Muk Wu Nga Yiu, which are situated in the west and the north of the Application Site respectively.



3 PLANNING CONTEXT

3.1 Statutory Planning Context

- 3.1.1 The Application Site falls within an area designated as “Agriculture” zone on the Approved Man Kam To Outline Zoning Plan No. S/NE-MKT/7 (**Figure 3**) (also known as the “OZP”). The planning intention of the “AGR” zone is *“primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes”*.
- 3.1.2 According to the Notes of the OZP, temporary uses (expected to be 3 years or less) of any land or buildings are always permitted as long as they comply with any other relevant legislation, the conditions of the Government lease concerned, and any other Government requirements, and there is no need for these to conform to the zoned use or these Notes. For temporary uses expected to be over 3 years, the uses must conform to the zoned use or the Notes.
- 3.1.3 Besides, according to the Notes of “AGR” zone, any filling of land to effect a change of use requires permission from the Town Planning Board.
- 3.1.4 The Explanatory Statement of the OZP also states the planning objective to preserve the existing amenity and character, and to avoid excessive development overburdening the infrastructure provisions and external transport capacity of the Area.



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S/NE-MKT/5

AGRICULTURE

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Agricultural Use Government Use (Police Reporting Centre only) On-Farm Domestic Structure Public Convenience Religious Institution (Ancestral Hall only) Rural Committee/Village Office	Animal Boarding Establishment Barbecue Spot Burial Ground Field Study/Education/Visitor Centre Government Refuse Collection Point Government Use (not elsewhere specified) House (New Territories Exempted House only, other than rebuilding of New Territories Exempted House or replacement of existing domestic building by New Territories Exempted House permitted under the covering Notes) Picnic Area Place of Recreation, Sports or Culture (Horse Riding School, Hobby Farm, Fishing Ground only) Public Utility Installation Religious Institution (not elsewhere specified) School Utility Installation for Private Project

Planning Intention

This zone is intended primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes.

Remarks

Any diversion of streams or filling of land/pond, 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 (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 draft development permission area plan without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance. This restriction does not apply to filling of land specifically required under prior written instructions of Government department(s) or for the purposes specified below:

- (i) laying of soil not exceeding 1.2m in thickness for cultivation; or
- (ii) construction of any agricultural structure with prior written approval issued by the Lands Department.

Diagram 3 Extract of Man Kam To OZP
(Source: Town Planning Board)



4 THE DEVELOPMENT PROPOSAL

4.1 Proposed Temporary Shop and Services as a Retail Store

4.1.1 The proposed development is intended to serve as a shop and services for a period of three years. Its primary function is to provide retail services associated with e-commerce parcel collection and distribution, therefore, supporting the surrounding developments, particularly those within the logistics sector.

4.2 Development Scheme

4.2.1 The Application Site covers an area of about 181 sq.m. There would be three various one-storey structures compound of about 70 sq.m. floor area for retail shop, ancillary office and storage, with a maximum height of not more than 4 metres. The site coverage is not more than 39% and plot ratio is about 0.39.

4.2.2 The indicative layout plan of the Proposed Development is shown in **Figure 5**. The development parameters of the Proposed Development are as follow:

Major Development Parameters	
Site Area	About 181 sq.m.
Number of Structures	3
Built Over Area	About 70 sq.m.
Plot Ratio	About 0.39
Height of Structures	Not more than 4 m/ 1 storey
Site Coverage	About 39%

4.3 Filling of Land

4.3.1 A stable platform for structures and vehicles manoeuvring is formed at the Application Site. The land fill required is about a maximum of 0.3m of concrete. Refer to **Figure 6** for the land filling plan.

4.4 Operation Arrangement

4.4.1 The proposed temporary shop and services is to support the local economy by providing retail services associated with e-commerce parcel collection and distribution. There will be ancillary office and storage in assisting the provision of retail service. The operation hours are from 8 a.m. to 8 p.m., Monday to Sunday (including public holidays).

4.4.2 Relevant application will be made to Lands Department for the Proposed Development.

4.5 Traffic Arrangement

4.5.1 With the site directly abut Lin Ma Hang Road, an ingress/egress point of at least 4 metres wide will be provided. One car parking space for private car/van-type light goods vehicle will be provided.

4.5.2 The estimated average traffic generation and attraction rate at peak hours are as follows:



Types	Traffic Generation Rate at Peak Hours (pcu/hr)	Traffic Attraction Rate at Peak Hours (pcu/hr)
Private Car / Van-type Light Goods Vehicle	2	2
Total	2	2

Note: Morning peak is from 7am to 9am while afternoon peak is from 4pm to 6pm

4.5.3 It is estimated that there will only be 2 roundtrips of Private Car / Van-type Light Goods Vehicle per peak operation hour for the delivery of materials or commuting purpose which will not cause a significant impact on trip generation and trip attraction within and around the site. Therefore, it is not anticipated to have any adverse traffic impact to the existing roads. This limited traffic volume is not expected to significantly impact traffic generation or attraction in the surrounding area. As a result, no vehicle queuing and interface issue with the upgrading works of Lin Ma Hang Road are anticipated.

4.5.4 While minimal traffic impact is anticipated from the estimated average traffic generation and attraction rate at peak hours, the proposed internal transport facilities are considered adequate. No queuing back of vehicles is anticipated as well. There will be no interface issue with the upgrading works of Lin Ma Hang Road, if any.



Diagrams 4-6 Traffic Condition of Lin Ma Hang Road

4.5.5 Situated in a convenient location, the proposed retail store is intended to serve



the local community where workers from the workshops/ storage sites and villagers in the surrounding areas can easily access the application site on foot and/or by bicycle.

Pedestrian Safety

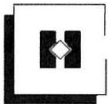
- 4.5.6 Pedestrian facilities and management measures would be provided to ensure the safety of pedestrians within and around the construction site. For instance, "Pedestrian Accidents Ahead" warning signs would be installed at all ingress and egress points to alert both motorists and pedestrians to potential hazards. The provision of such advance warnings will enable drivers to adopt a heightened level of caution and remain vigilant when approaching these areas. Moreover, road pumps would be installed at site entrances, exits and within parking areas to regulate vehicular speeds, thereby mitigating the risk of traffic accidents, particularly in locations with significant pedestrian movement.

No Illegal Parking

- 4.5.7 There would be a parking spaces for Private Car / Van-type Light Goods Vehicle provided in the Application Site. The incoming vehicle can park on the site which shall not cause any illegal parking in the vicinity. Furthermore, a "No Parking" notice will be posted at the entrance to the Application Site, and arrange for traffic wardens to stand guard. If the vehicle fails to cooperate when parking, the illegal parking incident would be reported to the police station.

4.6 Visual and Landscape Compatibility

- 4.6.1 The vicinity is of rural landscape character which are intermixed with workshops, open storage and car parks along the Lin Ma Hang Road. Further towards the village clusters are agricultural land, scattered village houses and temporary structures. A temporary hobby farm (No. A/NE-MKT/11), which is just adjacent from the Application Site, is of 1,480 sq.m with two structures of not more than 3m high. The proposed single storey structure will have a maximum height of not more than 4 metres only. With a site coverage of about 39%, the proposed development is visually compatible with the surrounding, and has no adverse impact on the existing rural landscape character as another nearby approval case (A/NE-MKT/37) allowing building structures no more than 8m. Prior to that, two similar applications (Application Nos. A/NE-MKT/34 and A/NE-MKT/35) in the vicinity were approved by the Committee on 20 September 2024 and 19 July 2024 respectively. Both were supported mainly on the consideration that both of them were to facilitate relocation of business operations affected by government projects (i.e. Yuen Long South (YLS) NDA and KTN NDA) and the Secretary for Development (SDEV) rendered policy support to the applications.
- 4.6.2 Immediately adjacent to the Application Site is another planning application (No. A/NE-MKT/49) for a temporary vehicle repair workshop and open storage of coaches with ancillary facilities. The application was previously



rejected on 5 September 2025 but was subsequently reviewed and approved by TPB on 12 December 2025. In approving the application, the TPB took into account the policy support provided by the Commissioner for Tourism, the applicant's significant market presence in cross-boundary coach repair services contributing to tourism development, the site's locational suitability being situated to the south of Lin Ma Hang Road, the absence of adverse technical implications, its inclusion within the boundary of the future NTN New Town, and the temporary nature of the proposal.

4.6.3 Members generally agreed that approval of **A/NE-MKT/49** would not constitute a precedent for similar proposals, given its distinctive circumstances. The approved site covers a total area of about 5,877 sq.m, including about 364 sq.m of government land. The development comprises five structures not exceeding 7m in height and two storeys, with a total GFA of about 1,058 sq.m and a PR of 0.18. The site is enclosed by fencing except at the ingress and egress points, therefore, minimising visual intrusion to the surrounding environment. Green-coloured fencing and roofing materials are adopted to soften the visual impact of the proposed temporary structures and to achieve visual integration with the rural setting.

4.6.4 Given that the proposed development is smaller in scale and lower in height than the approved development under aforementioned planning applications, it is considered that the Proposed Development would not generate any adverse visual, landscape or environmental impacts on the surrounding areas.

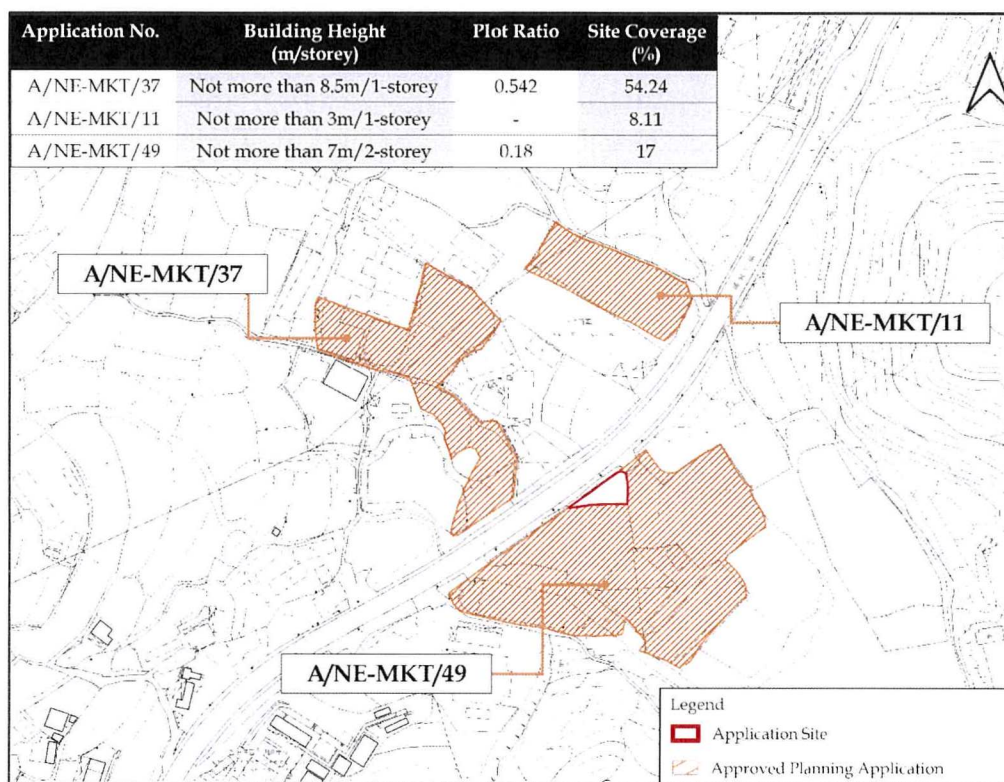
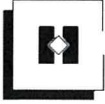


Diagram 7 Similar Planning Application Nos. A/NE-MKT/11, A/NE-MKT/37 and A/NE-MKT/49 in the Vicinity



(Source: Town Planning Board)

4.6.5 As no existing trees have been identified within the Application Site, no tree felling works are anticipated. The Proposed Development has been carefully designed to ensure compatibility and harmonious integration with the surrounding environment.

4.7 **Environmental Consideration**

4.7.1 The latest “Code of Practice on Handling the Environment Aspects of Temporary uses and Open Storage Sites” will be observed and followed. It is anticipated that the construction and operation of the proposed temporary shop and services will not have adverse environment impacts.

4.8 **Fire Safety Consideration**

4.8.1 The latest “Fire Safety Requirements for Temporary Storage and Structures under Planning Application, Short Term Tenancy & Short Term Waiver” as published by the Fire Services Department will be observed and followed. It is anticipated that the construction and operation of the proposed temporary shop and services will not have fire safety concerns with provision of fire services installation.

5 **PLANNING ANALYSIS**

5.1 **Existing Village Clusters and Developments**

5.1.1 The vicinity is rural in character. Muk Wu and Muk Yu Nga Yiu are the two village clusters along Lin Ma Hang Road, with San Uk Ling in the southward. Besides, there are workshops and open storage along the Lin Ma Hang Road. However, insufficient retail service is available in the surroundings at the moment.

5.2 **Substantial Change in Planning Context of Man Kam To Area**

5.2.1 According to the Northern Metropolis Development Strategy promulgated in 2022 and the Northern Metropolis Action Agenda issued in 2023, Muk Wu and the Man Kam To area are identified within the Boundary Commerce and Industry Zone. Owing to their strategic location adjacent to the Man Kam To and Heung Yuen Wai Boundary Control Points, the Man Kam To area, including the Application Site, is intended for logistics-related development to capitalise on cross-boundary connectivity. Together with the Lo Wu and Heung Yuen Wai Boundary Control Points, these developments present opportunities to strengthen the gateway economy and enhance the development potential of the surrounding areas. Under the latest development framework for the New Territories North New Town (NTN NT), the Application Site and its adjoining areas fall within the Man Kam To Boundary Mixed Use Area, which is proposed for mixed-use and residential developments, implying that substantial changes to the planning context are anticipated in the near future.



5.2.2 Upon re-planning the rural land use around Man Kam To Area, there will be a steady housing supply in the long run, which meets the growing demand by the coming development of the Hong Kong-Shenzhen Close Interaction Circle. In addition, the Northern Link Eastern Extension recommended under the Strategic Studies on Railways and Major Roads beyond 2030 will enhance connections within the Man Kam To Area. The upgrading works of Lin Ma Hang Road will also help unleash the development potential of the rural land use.



Diagram 8 Extract of Board Land Use Concept of New Territories North New Town Development Proposal
(Source: Planning Department, HKSAR Government)

5.2.3 Echoing this comprehensive development concept, development proposals in the vicinity are realising recently. Along Lin Ma Hang Road, immediately north of the application site, there was an approved s.16 planning application for a temporary place of recreation, sports or culture (hobby farm) under Application No. A/NE-MKT/53. The approved site, with a total area of approximately 1,500 square metres, a plot ratio of 0.08 and a maximum building height not exceeding 4 metres, is designed to accommodate up to 20 visitors per day and there will be two staffs to facilitate its operation.

5.2.4 The former Sam Wo Public School, just to the south of the Application Site along the Lin Ma Hang Road, has been granted to the Hong Kong Seeing Eye Dogs Services as a guide dog training school with an area of 24,500 sq.ft.. Refer to **Figure 4** for details.

5.3 Precedent Approved Planning Applications

5.3.1 To cope with the updates in the New Territories North New Town Development Proposal, there are numbers of applications approved in the recent three years, which brings more traffic flows and population to the



community, following the living demand of the district has increased. Refer to **Figure 9** for locations of approved planning applications in the vicinity.

Application No.	Proposed use	Decision Date	Decision
A/NE-MKT/49	Temporary Vehicle Repair Workshop and Open Storage of Vehicle (Coaches Only) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	12/12/2025	Approved with condition(s) on a temporary basis
A/NE-MKT/53	Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm) and Associated Filling of Land for a Period of 3 Years	21/11/2025	Approved with condition(s) on a temporary basis
A/NE-MKT/46	Proposed Temporary Warehouse for Storage of Construction Materials for a Period of 3 Years	18/07/2025	Approved with condition(s) on a temporary basis
A/NE-MKT/47	Proposed Temporary Shop and Services (Convenient Store) and Associated Filling of Land for a Period of 3 Years	18/07/2025	Approved with condition(s) on a temporary basis
A/NE-MKT/40	Proposed Temporary Warehouse for Storage of Construction Materials and Furniture for a Period of 3 Years and Associated Filling of Land	02/05/2025	Approved with condition(s) on a temporary basis
A/NE-MKT/39	Proposed Temporary Warehouse for Storage of Construction Materials for a Period of 3 Years and Associated Filling of Land	24/01/2025	Approved with condition(s) on a temporary basis
A/NE-MKT/37	Proposed Temporary Warehouse for Storage of Food Provisions for a Period of 3 Years and Associated Filling of Land	10/01/2025	Approved with condition(s) on a temporary basis

5.4 Similar Planning Application in the “Agriculture” zone of North East New Territories

5.4.1 There is an approved planning application of a similar nature (No. **A/NE-MKT/47**) in the Subject OZP. Besides, a number of similar planning applications have been approved in recent years within the “Agriculture” (“AGR”) zone of the North East New Territories New Development Areas. In particular, Application No. **A/NE-LT/776**, which involved a proposed temporary shop and services use with an ancillary office within the “AGR” zone of the approved Lam Tsuen Outline Zoning Plan No. **S/NE-LT/11**, was approved with conditions on a temporary basis by the Rural and New Town Planning Committee on 10 January 2025. The approval was subject to conditions regarding implementation of drainage facilities, fire service installations and water supplies for firefighting.

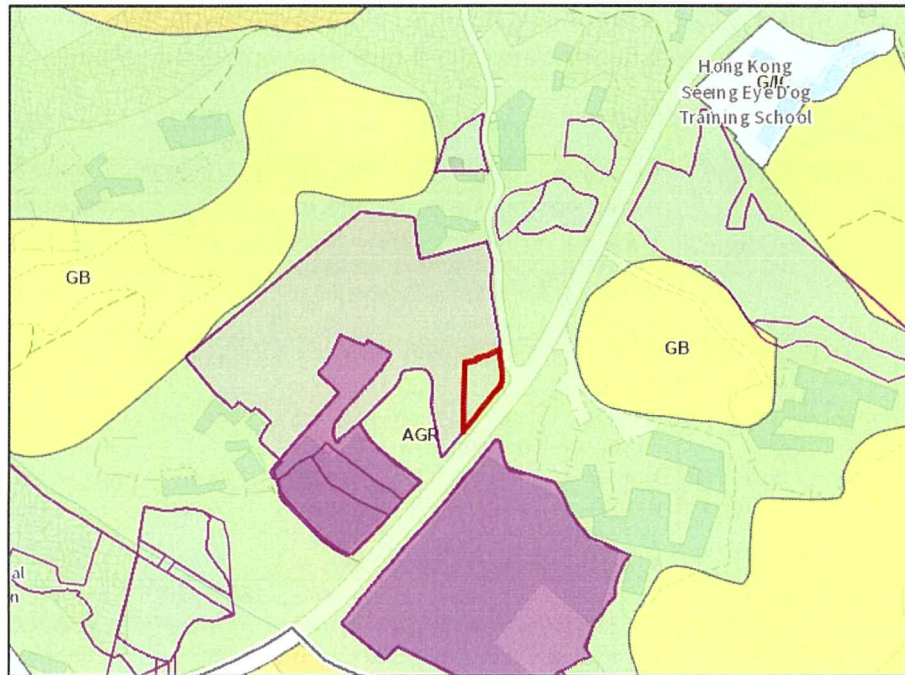
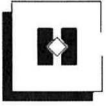


Diagram 9 Approved Planning Application No. A/NE-MKT/47 on “AGR” zone of the Man Kam To OZP
(Source: Town Planning Board, HKSAR Government)

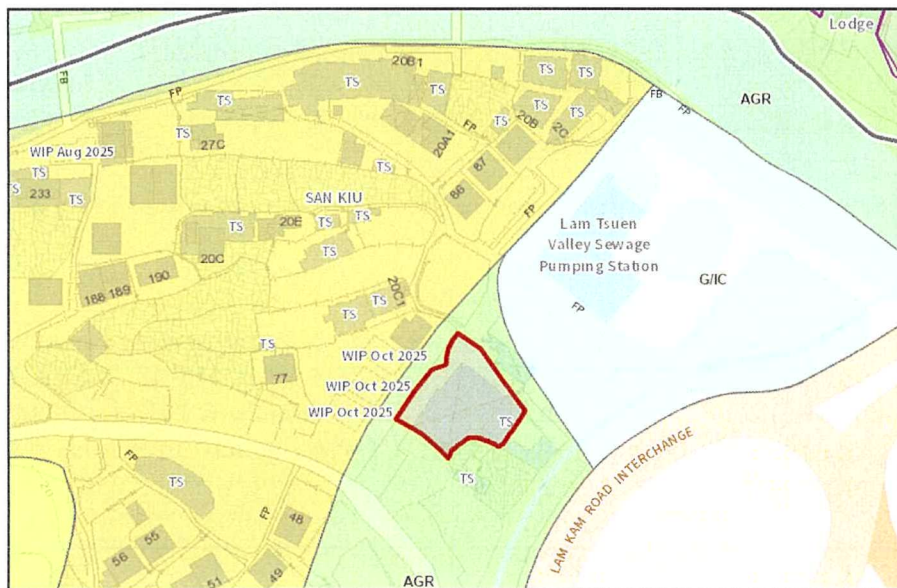


Diagram 10 Approved Planning Application No. A/NE-LT/776 on “AGR” zone of the Man Kam To OZP
(Source: Town Planning Board, HKSAR Government)



5.5 Not Falling within the Proposed Agricultural Priority Area

- 5.5.1 The Application Site has been hard-paved for a long history already. There is no agricultural activities on the Application Site for a substantial period as well. Given to the small size and irregular shape of the Application Site, there is little potential for agricultural purpose.
- 5.5.2 The Application Site does not fall within any of the Agricultural Priority Areas (APAs) as proposed by Agriculture, Fisheries and Conservation Department (AFCD), suggesting that no negative impacts to the goal of developing agricultural area, and provides supporting measures to promote the active development in the district are anticipated.
- 5.5.3 According to the *Proposed delineation of quality farmland as Agricultural Priority Areas* under LC Paper No. CB(2)1591/2024(01), "As for planning applications for non-agricultural use of farmland outside APAs, objections will normally not be raised by AFCD from agricultural perspective".

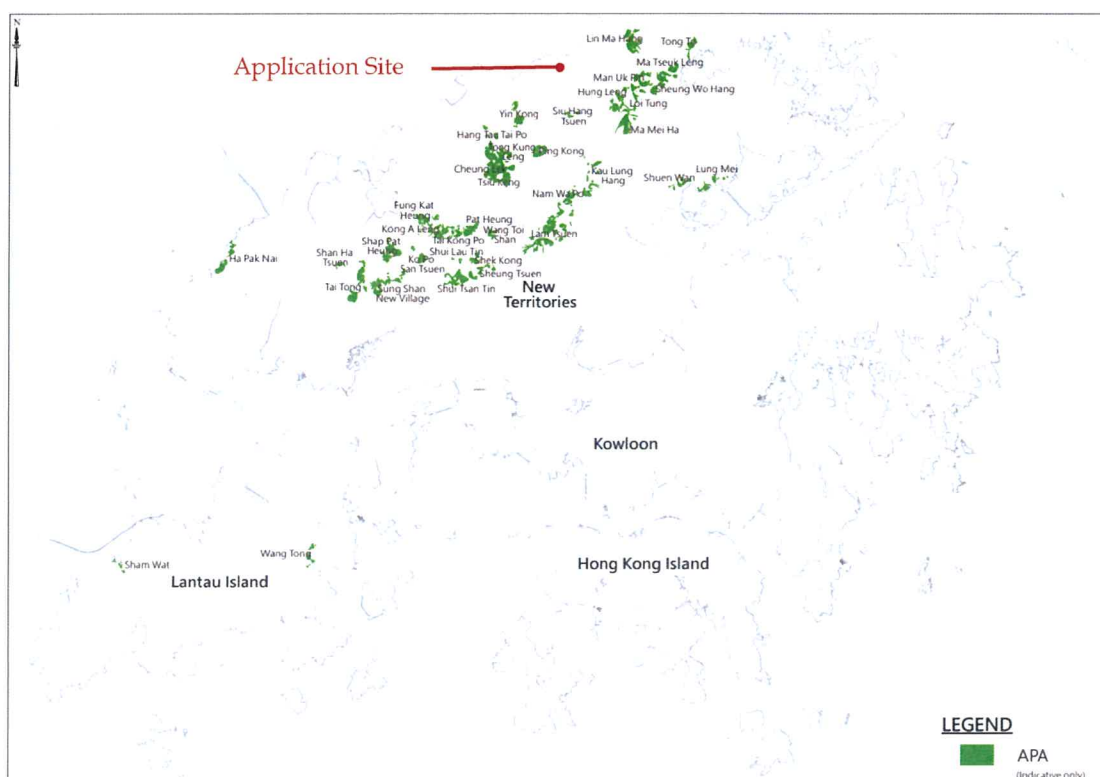
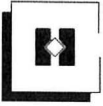


Diagram 11 Locations of 37 Proposed APAs
(Source: Agriculture, Fisheries and Conservation Department, HKSAR Government)

5.6 Strong Demand for Retail Services

- 5.6.1 It is noted that there is only one location for retail services in the vicinity, but strong/uprising demand from the residents and nearby workers are expected.
- 5.6.2 The Proposed Development is designed to serve around 2,500 local residents, employees and visitors. It aligns with sustainable land-use optimization,



robust transport connectivity, and enhanced transport and logistic efficiency. The temporary Shop and Services facility meet latest retail demand in an environmentally conscious manner by providing hyperlocal services that reduce the need for longer vehicle trips. Strategically located along Lin Ma Hang Road, the facility supports pedestrian-friendly connectivity across three village clusters, existing workshops and upcoming construction.

- 5.6.3 Positioning as a strategic cross-boundary logistics node, the Proposed Development will directly connect with Hong Kong–Shenzhen transport flows, supporting the Northern Metropolis and Greater Bay Area policies which promote economic development, logistics connectivity and regional cooperation. It will enhance first- and last-mile efficiency for both parcels and passengers.
- 5.6.4 Current government policy which aims to redistribute cross-boundary traffic among the eastern control points, including HYW, MKT and Sha Tau Kok, will alleviate congestion and optimize overall capacity, thereby demonstrating the planning merit of the Proposed Development. This policy direction also emphasises the demand for supporting facilities such as parking areas, logistics yards and service-related uses in the district. The shifting of traffic from MKT and Sha Tau Kok to HYW is expected to ease local road congestion and create opportunities for more coordinated logistics layouts, including expanded parking and staging areas near HYW. Hence, the Application Site is well positioned to accommodate e-commerce collection and distribution point with efficient in-out truck operations.
- 5.6.5 The Proposed Development will integrate retail and service components, such as parcel pickup and return counters, basic value-added services (i.e. packaging and repair drop-off) and facilities that cater to travelers, cross-boundary drivers and local residents using HYW and MKT BCP. With increasing cross-boundary passenger and vehicle movements through HYW, the addition of online-to-offline functions, including self-pickup lockers, multi-platform service counters, payment points and customs support, will further streamline both people and cargo flows. These initiatives align with the Transport Strategy Blueprint 2026 and the 2024 and 2025 Policy Addresses, which reinforce Hong Kong’s position as a regional logistics and services hub and a leading international logistics gateway.

6 RETAIL DEMAND AND SUPPLY ANALYSIS

- 6.1 **Evidence-based urban planning tool** is applied to support the proposed temporary shop and services at Man Kam To, Hong Kong. This section aims to provide evidence and analysis to support that there are strong and emerging demand for retail space in the vicinity.
- 6.1.1 According to United Nations Development Programme, evidence-based urban planning can be considered as “a transformative approach to urban development, where decision-making is no longer driven by intuition or tradition but rather by a meticulous and data-driven process. At its core, this methodology revolves around the collection, analysis, and application of



accurate and current data and evidence to inform every facet of urban planning and development.”

6.2 Strong and Emerging Demand for Retail Space in Vicinity

6.2.1 At the local context, there is only one shop/ convenience store in the vicinity. A spatial analysis is conducted to address the demand from local villagers and nearby workers for retail space.

6.2.2 To provide an objective and spatially informed assessment, a kernel density estimation (KDE) heatmap analysis was undertaken¹. This geospatial technique generates a continuous density surface by smoothing point-based data, revealing clusters of attractions more effectively than conventional point mapping. A 600-meter buffer zone around the Application Site was created, representing a comfortable walking distance for individuals collecting couriers or products. It was then analysed using kernel density estimation in QGIS which incorporated the elements within the 600-meter buffer around the Application Site.

6.2.3 The output heatmap (See **Diagram 12**) focuses on the distribution and clustering of existing facilities and approved developments (by the Town Planning Board), including workshop, hobby farm and school (i.e. Hong Kong Seeing Eye Dog Training School). Such facilities/ developments serve as significant attractors, drawing not only local villagers but also workers, visitors, and participants in recreational, economic or educational activities. Collectively, they generate consistent and multifaceted demand for supporting services of courier and parcel collection/delivery which arises from online purchases of supplies, equipment, produce, educational materials, and everyday goods associated with these operations.

6.2.4 The kernel density map for these existing facilities and approved developments pronounced clustering, with darker shades indicating higher concentrations. The Application Site is centrally positioned within this high-density core, placing it at the heart of an active ecosystem of mixed uses.

¹ Kernel Density Estimate calculates the density of attractions in the selected buffer area. A higher mean from KDE indicates there are more tourism resources within the selected buffer area.

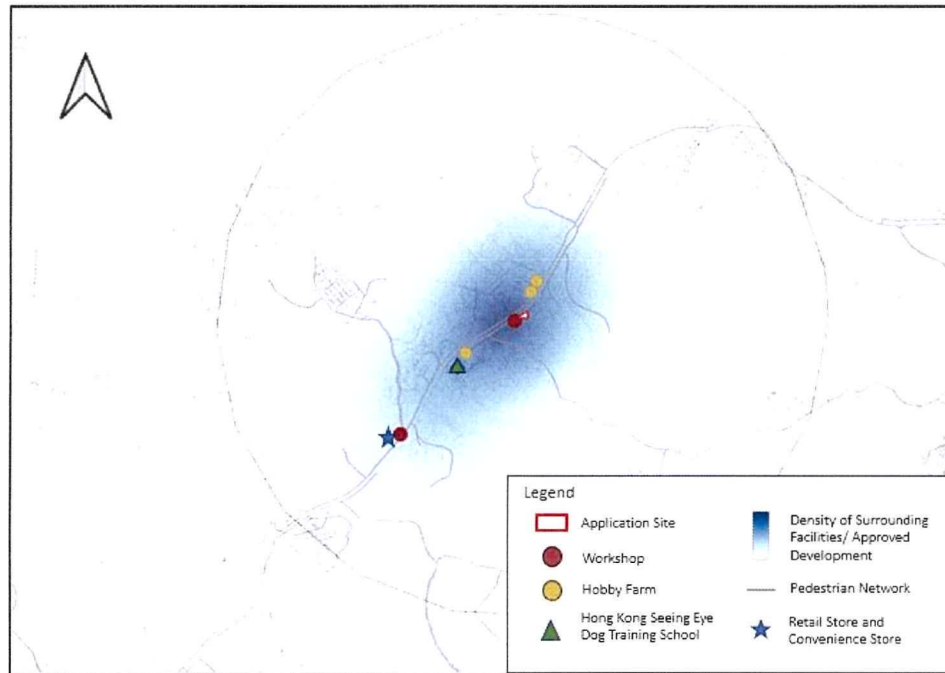
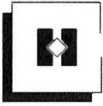


Diagram 12 KDE Heatmap of existing facilities and approved developments in the vicinity (Source: Town Planning Board, HKSAR Government & OpenStreetMap)

6.3 Neighborhood Characteristics and Demand from Local Village

6.3.1 Three distinct village clusters can be located within the 600 meter buffer around Application Site: Muk Wu Tsuen to the west, Nga Yiu Village to the north, and San Uk Ling to the southeast. These villages collectively form a concentrated local population base, generating inherent demand for everyday retail services.

6.3.2 To understand the demographic profile underpinning this demand, the analysis draws on the 2021 Population Census data from the Small Tertiary Planning Unit (STPU) Group. Referring to the STPU unit of STPUG_21C, which is the smallest available census spatial unit that aligns closely with the study area, encompassing Man Kam To and Lo Wu, it provides the most relevant dataset for characterizing the resident population in and around the Application Site (See **Diagram 13**). Key statistics from STPUG_21C reveal that approximately 33% of residents are aged 15–44, a significant cohort often characterized as digitally engaged and more inclined toward modern shopping behaviors. Additionally, the area shows 54.7% of the population in the labor force and 48.0% of the working population, indicating a notable presence of economically active individuals who may rely on convenient retail and delivery solutions to support work-related or daily needs.

6.3.3 According to the *Online Purchases of Households in Hong Kong (2021)*, the pandemic significantly boosted digital shopping habits, establishing e-commerce as a persistent and dominant retail trend. While younger generations are generally more inclined toward online purchases, the data also show meaningful participation across age groups: 29% of elderly households (all members aged 65 and over) had engaged in online purchases,



whereas the rate was substantially higher at 68% for households with member(s) aged 15–44. The prominence of the 15–44 age group in the local area (33%) therefore represents a key, underserved segment likely to generate regular demand for courier-related retail services, such as convenient parcel collection points, to complement their online shopping activities.

6.4 The kernel density output for village clusters further substantiates this demand pattern. Darker shades on the map indicate higher concentrations and intensities of surrounding elements including all village clusters, surrounding facilities and approved development. The Application Site is prominently located directly within one of the darkest zones, meaning it lies at the geographic heart of the combined population from the three villages and users of different facilities. The well-connected pedestrian network linking the site to both village clusters and facilities/ developments enhance accessibility, enabling the Proposed Development to effectively cater to the local needs in an optimally located setting.

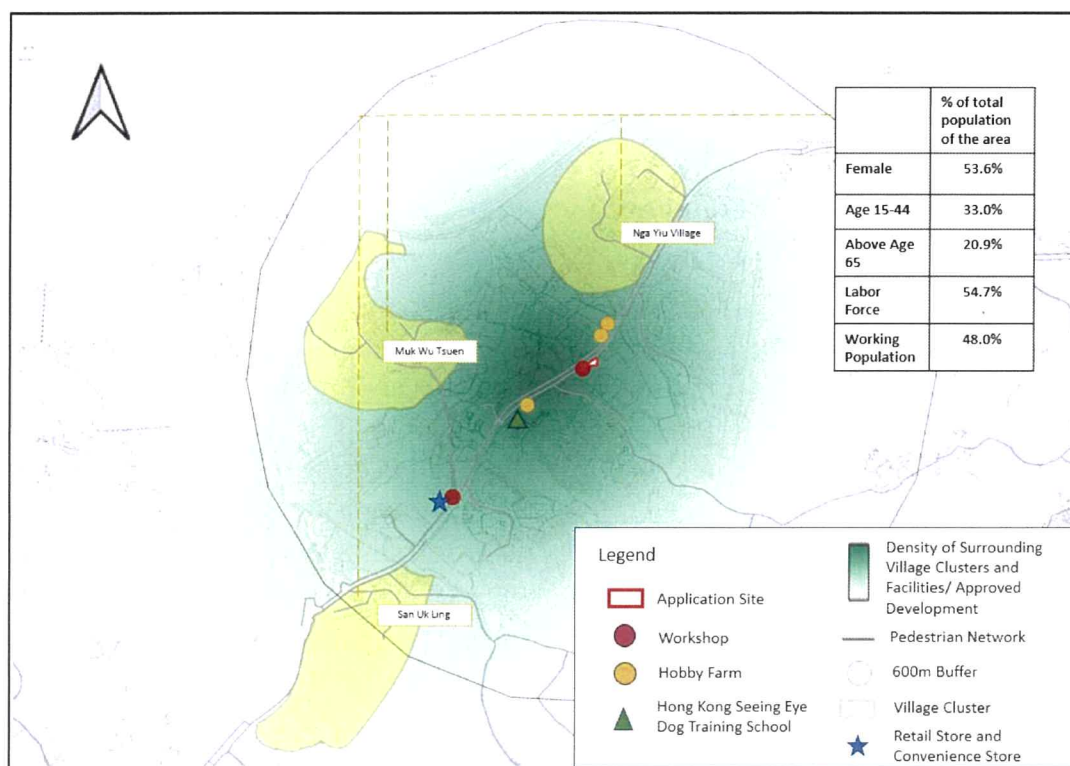


Diagram 13 KDE Heatmap of village clusters, existing facilities and approved developments in the vicinity

(Source: Town Planning Board, HKSAR Government & OpenStreetMap)



7 PLANNING MERITS & JUSTIFICATIONS

7.1 Strong Planning Merit by Supporting the Local Economy and Surrounding Development

7.1.1 There are existing village clusters and workshops in the vicinity, with temporary sawmills/ workshops and the guide dog training school in placed. However, there is currently only one proposed retail shop/ convenience store in the vicinity. To cope with the existing/rising demand driven by the development of NTN New Town and as a planning merit, the proposed temporary shop and services situating at a convenient location along the Lin Ma Hang Road will support the local economy and satisfy the commercial need.

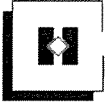
7.2 The Retail Demand and Supply Analysis in the above chapter strongly supports the provision of retail services in this Application Site. It clearly demonstrates strong and growing demand for a retail service store. The Proposed Development maximizes accessibility and catchment for the surrounding residents, enabling the proposed retail service store to efficiently capture and serve the demonstrated local demand which cannot be fulfilled by the existing one retail and convenient store nearby.

7.3 Embracing Urban-Rural Integration

7.3.1 According to the NTN NT Development Proposal, the Man Kam To area will gradually change in planning context, in the future expect to have rezoning for Mixed Use/ Residential. Massive construction work will be anticipated. As an interim measures, this proposal helps to provide more services for the existing rural villages and workers. While it is understood that the Consultancy Study for Urban Rural Integration Principles is still undergoing, it is noteworthy that the Proposed Development should be in line with the well-recognised urban-rural integration direction by enhance living quality and standards of the villages.

7.3.2 The Proposed Development is anticipated to enhance existing infrastructure by generating additional pedestrian and vehicular flows. The provision of temporary facilities would address short-term needs in a cost-effective manner, support businesses affected by relocation, and supplement the limited commercial offerings within the rural area. The resulting increase in traffic volumes may also substantiate and complement ongoing road improvement initiatives (i.e. the widening of Lin Ma Hang Road), reflecting a demonstrated demand for improved connectivity and capacity.

7.3.3 Besides, the Proposed Development would improve overall liveability and visitor experience through the introduction of essential amenities, while contributing to the revitalisation of a historically isolated village by attracting visitors and promoting awareness of its cultural heritage and biodiversity, which would further strengthen rural-urban integration.



7.4 Would Not Jeopardize the Long-Term Planning Intention and Conform to the Statutory Plan

7.4.1 The proposed development is temporary in nature. It would not jeopardize the long-term planning intention of the "Agriculture". The proposed temporary use for a period of 3 years also conforms to the Notes of the OZP.

7.4.2 The Application Site falls completely within the "AGR" zone, however, the Application Site in nature has no good potential for agricultural rehabilitation.

7.4.3 According to the Notes of OZP, it is intended that with proper management, the land would be revitalised and utilised for agricultural uses. The irregular shape, small scale and soil condition of the Application Site do not provide a favourable environment for economic planting activities such as cash crop growing, orchards and nurseries. Hence, it is not financially viable for cultivation.

7.4.4 Nevertheless, decommission of the proposed development could easily convert the application site back to the existing status, which will allow for future agricultural purpose. The proposed temporary shop and service use is considered to be required by the local community at the current stage, permission on temporary basis is thus sought.

7.4.5 Besides, with the implementation of Man Kam To Boundary Mixed Use Area, the vicinity will definitely not be zoned as "Agricultural" in the future. This proposal is temporary in nature which allows flexibility for future changes.

7.5 Not Required for Agricultural Use

7.5.1 The Application Site also not fall within any proposed Agricultural Priority Area. In the future, this land is expected no longer to be designated for agricultural use. Thus, it is expected that no objection will be raised by the Agriculture, Fisheries and Conservation Department.

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

7.6.1 The proposed development of no more than 4 m in building height and a site coverage of not more than 39% is considered visually compatible with surrounding that comprises open storage, workshops, sawmills, carpark, scattered dwelling and agricultural land. It is noteworthy that the recently approved planning applications even have a maximum site coverage of above 50%, a maximum plot ratio of above 0.5 and a maximum building height of not more than 8.5m. The proposed development with the proposed development parameters is compatible with the surrounding development.

7.6.2 No felling of trees or removal of grass land is anticipated. There is no change in the landscape value. No adverse landscape impact is anticipated.



7.7 No Adverse Traffic Impact

7.7.1 The proposed development will not incur adverse traffic impact. Workers and villagers in the vicinity can easily access the Application Site on foot or by bicycle. The proposed internal transport facility can accommodate the estimated traffic trips. No queuing back toward Lin Ma Hang Road is anticipated. Pedestrian safety measures will be considered and measures will be incorporate to avoid illegal parking.

7.7.2 The proposed development will not have any potential interface issue with the upgrading works along Lin Ma Hang Road. Close liaison during the construction work period will be maintained with the relevant Government departments if necessary.

7.8 No Adverse Environmental Impact and Fire Safety Concern

7.8.1 Following the latest “Code of Practice on Handling the Environment Aspects of Temporary uses and Open Storage Sites”, the construction and operation of the proposed development will not have adverse environment impacts including noise, air quality, drainage and sewerage impacts.

7.8.2 Following the latest “Fire Safety Requirements for Temporary Storage and Structures under Planning Application, Short Term Tenancy & Short Term Waiver”, fire services installation will be provided and no fire safety concern is anticipated.

7.9 Similar Approved Planning Application in the “Agriculture” Zone of North East New Territories

7.9.1 The recently approved planning application No. **A/NE-MKT/47** for Temporary Shop and Services (Convenience Store) use within the “Agriculture” (“AGR”) zone under the approved Man Kam To Outline Zoning Plan No. S/NE-MKT/7 serves as a similar precedent. Besides, a number of similar planning applications within the “AGR” zones of the North East New Territories New Development Areas have been approved in recent years. For instance, Application No. **A/NE-LT/776**, which involved a proposed Temporary Shop and Services use with an ancillary office within the “AGR” zone of the approved Lam Tsuen Outline Zoning Plan No. S/NE-LT/11, was approved with conditions on a temporary basis by the Rural and New Town Planning Committee on 10 January 2025, indicating the suitability of proposed development and TPB’s general acceptance on the planning application in similar nature.

7.10 Precedent Approved Planning Application in the Subject “Agriculture” Zone

7.10.1 The approval of s.16 planning application for Temporary Vehicle Repair Workshop and Open Storage of Vehicle (Coaches Only) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years under No.



A/NE-MKT/49 adjacent to the Application Site confirms the suitability of temporary use in the subject "AGR" zone. To compare with, the scale of the proposed development (site area of 181 sq.m.) is only 3% of the scale of application no. A/NE-MKT/35 (site area of 5,877 sq.m.). Adverse impacts under this application, if any, is expected significantly smaller than that under the application no. A/NE-MKT/49.

8 CONCLUSION

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



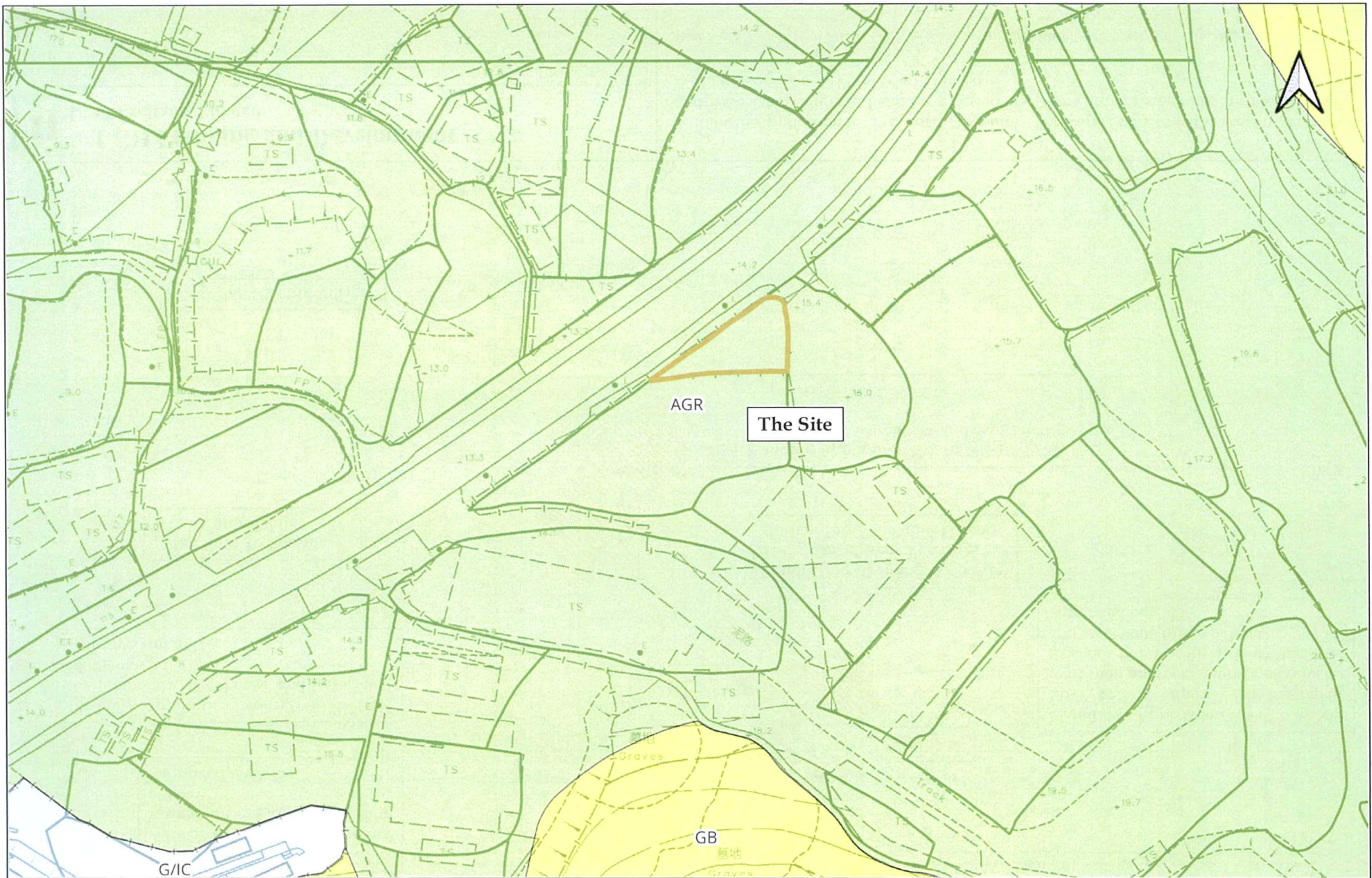
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Figure 1 : Location Plan

Source: HK Geodata Store, HKSAR Government

Section 16 Application for Proposed Temporary Shop and Services with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at the Remaining Portion of Section A of Lot No. 477 in D.D. 90, Man Kam To

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)



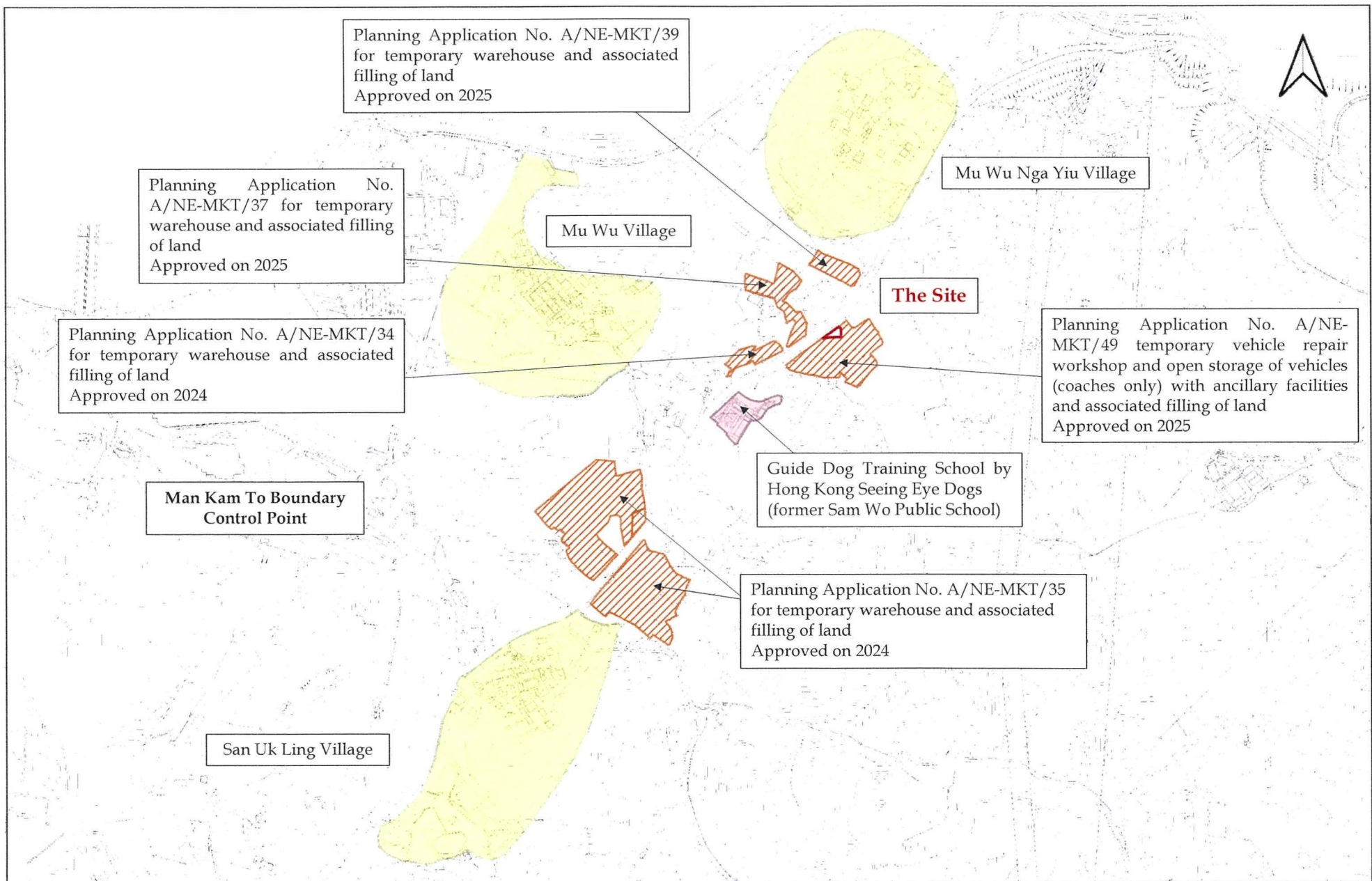
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Section 16 Application for Proposed Temporary Shop and Services with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at the Remaining Portion of Section A of Lot No. 477 in D.D. 90, Man Kam To

Figure 3 : Extract of Outline Zoning Plan No. S/NE-MKT/5

Source: HK Geodata Store & Town Planning Board, HKSAR Government

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)



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Section 16 Application for Proposed Temporary Shop and Services with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at the Remaining Portion of Section A of Lot No. 477 in D.D. 90, Man Kam To

Figure 4 : Surrounding Context

Source: HK Geodata Store, Planning Department & Town Planning Board, HKSAR Government

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)

Existing Fencing
surrounding the Site of
about 1.5m tall

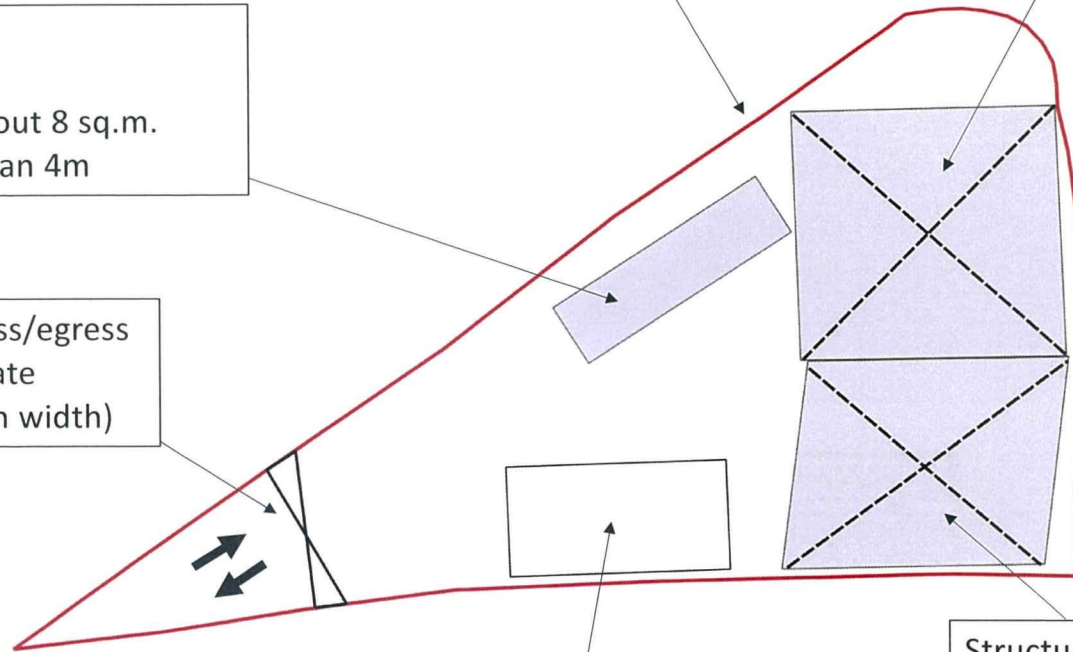
Structure 1

One-storey Retail Shop with
ancillary office, storage and toilet
Total Floor Area : About 34 sq.m.
Height : Not more than 4m

Structure 3

One-storey storage
Total Floor Area : About 8 sq.m.
Height : Not more than 4m

Existing Ingress/egress
with Gate
(About 4m in width)



Parking space for private vehicle/ van-
type Light Goods Vehcles
(about 5m x 2.5m)

Structure 2

One-storey Retail Shop with storage
Total Floor Area : About 28 sq.m.
Height : Not more than 4m

0 5 10 m



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Section 16 Application for Proposed Temporary Shop and Services with Ancillary Facilities
and Associated Filling of Land for a Period of 3 Years at the Remaining Portion of Section
A of Lot No. 477 in D.D. 90, Man Kam To

Figure 5 : Indicative Layout Plan

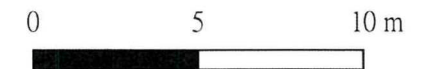
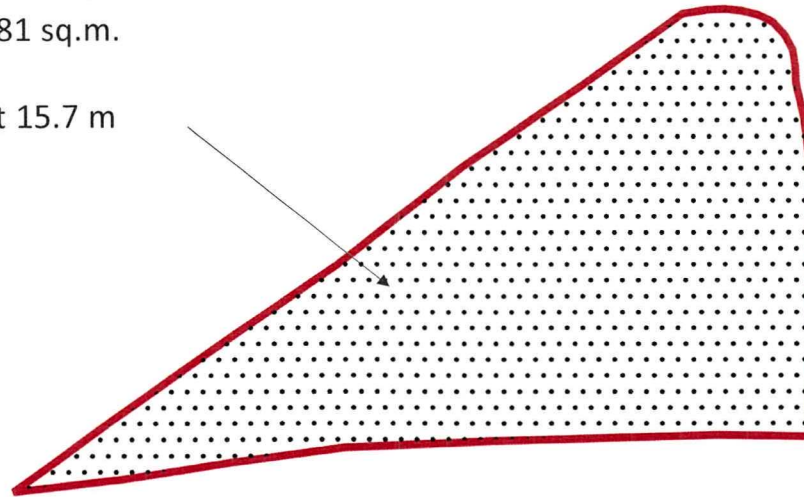
Source: HK Geodata Store & Town Planning Board, HKSAR Government

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)

Land Filling

Concrete Bed for a depth of not more than 0.3 m and an area of about 181 sq.m.

Site level: about 15.7 m



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Figure 6 : Land Filling Plan

Section 16 Application for Proposed Temporary Shop and Services with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at the Remaining Portion of Section A of Lot No. 477 in D.D. 90, Man Kam To

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)