

**Relevant Extracts of Town Planning Board Guidelines on  
Application for Open Storage and Port Back-up Uses  
(TPB PG-No. 13G)**

1. On 14.4.2023, 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) were promulgated, which set out the following criteria for the various categories of area:
  - (a) Category 1 areas: favourable consideration will normally be given to applications within these areas, subject to no major adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions. Technical assessments should be submitted if the proposed uses may cause significant environmental and traffic concerns;
  - (b) Category 2 areas: planning permission could be granted on a temporary basis up to a maximum period of 3 years, 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. Technical assessments, where appropriate or if required, should be submitted to demonstrate that the proposed uses would not have adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas;
  - (c) Category 3 areas: applications 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). 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. Planning permission could be granted on a temporary basis up to a maximum period of 3 years, 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; and
  - (d) Category 4 areas: applications would normally be rejected except under exceptional circumstances. For applications on sites with previous planning approvals (irrespective of whether the application is submitted by the applicant of previous approval or a different applicant), and subject to no adverse departmental comments and local objections, 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. The intention is however to encourage the phasing out of such non-conforming uses as early as possible. Planning permission for a maximum period of 3 years may be allowed for an applicant to identify suitable sites for relocation. Application for renewal of approval will be assessed on its individual merits.

2. In assessing applications for open storage and port back-up uses, the other major relevant assessment criteria are also summarised as follows:
- (a) port back-up sites and those types of open storage generating adverse noise, air pollution and visual intrusion and frequent heavy vehicle traffic should not be located adjacent to sensitive receivers such as residential dwellings, hospitals, schools and other community facilities;
  - (b) port back-up uses are major generators of traffic, with container trailer/tractor parks generating the highest traffic per unit area. In general, port back-up sites should have good access to the strategic road network, or be accessed by means of purpose built roads;
  - (c) adequate screening of the sites through landscaping and/or fencing should be considered where sites are located adjacent to public roads or are visible from surrounding residential areas;
  - (d) there is a general presumption against conversion of active or good quality agricultural land and fish ponds to other uses on an ad-hoc basis. For flood prone areas or sites which would obstruct natural drainage channels and overland flow, advice should be sought; and
  - (e) for applications involving sites with previous planning approvals, should there be no evidence to demonstrate that the applicants have made any genuine effort to comply with the approval conditions of the previous planning applications, planning permission may be refused, notwithstanding other criteria set out in the Guidelines are complied with.

**Previous S.16 Application**

**Approved Application**

<b>Application No.</b>	<b>Uses/ Development</b>	<b>Date of Consideration</b>
A/NE-TKL/786	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years and Associated Filling of Land	24.1.2025 (Revoked on 24.1.2026)

**Similar S.16 Applications for Temporary Open Storage  
in the Vicinity of the Application Site within “Agriculture” Zone in the Past Five Years**

**Approved Applications**

	<b>Application No.</b>	<b>Uses/Developments</b>	<b>Date of Consideration</b>
1	A/NE-TKL/671 <sup>!</sup>	Temporary Open Storage of Waste Paper, Waste Plastics and Waste Metal Cans for Recycling and Workshop for Recycling for a Period of 3 Years	9.7.2021
2	A/NE-TKL/695	Proposed Temporary Open Storage and Warehouse for Storage of Timber and Wooden Parts for a Period of 3 Years	18.3.2022 (Revoked on 18.9.2023)
3	A/NE-TKL/707 <sup>\$</sup>	Renewal of Planning Approval for Temporary Open Storage of Construction Equipment and Materials for a Period of 3 Years	23.9.2022
4	A/NE-TKL/714 <sup>%</sup>	Temporary Open Storage of Construction Machinery and Construction Materials for a Period of 3 Years	19.5.2023 (Revoked on 19.11.2024)
5	A/NE-TKL/724 <sup>^</sup>	Proposed Temporary Open Storage of Construction Machinery and Construction Materials for a Period of 3 Years	11.9.2023 (Revoked on 4.12.2023)
6	A/NE-TKL/734	Temporary Open Storage of Construction Materials, Equipment and Machineries with Ancillary Storage of Construction Equipment, Machineries, Tools and Site Office for a Period of 3 Years	11.8.2023
7	A/NE-TKL/743 <sup>@</sup>	Proposed Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	19.4.2024 (Revoked on 19.1.2026)
8	A/NE-TKL/745 <sup>^</sup>	Proposed Temporary Open Storage of Construction Machinery and Construction Materials for a Period of 3 Years	15.3.2024 (Revoked on 15.9.2025)
9	A/NE-TKL/746	Proposed Temporary Open Storage of Construction Material and Machinery with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	15.3.2024 (Revoked on 15.12.2025)
10	A/NE-TKL/758 <sup>!</sup>	Renewal of Planning Approval for Temporary Open Storage of Recyclable Materials and Ancillary Workshop for a Period of Three Years	5.7.2024

11	A/NE-TKL/761	Proposed Temporary Open Storage of Construction Material and Machinery with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	22.11.2024
12	A/NE-TKL/763	Proposed Temporary Open Storage of Construction Material and Machinery with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	4.10.2024
13	A/NE-TKL/805 <sup>%</sup>	Temporary Open Storage of Construction Machinery and Construction Materials and Associated Filling of Land for a Period of 3 Years	15.8.2025
14	A/NE-TKL/806	Proposed Temporary Open Storage of Construction Materials and Machineries with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	19.9.2025
15	A/NE-TKL/807	Proposed Temporary Open Storage of Construction Materials and Machineries with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	10.10.2025
16	A/NE-TKL/815	Proposed Temporary Open Storage of Construction Materials and Machinery and Associated Filling of Land for a Period of 3 Years	14.10.2025
17	A/NE-TKL/821 <sup>\$</sup>	Temporary Open Storage of Construction Materials and Machinery, Containers and Vehicles and Associated Filling of Land for a Period of 3 Years	5.12.2025
18	A/NE-TKL/833	Proposed Temporary Open Storage of Construction Materials and Machinery and Associated Filling of Land for a Period of 3 Years	17.4.2026

### Remarks

- <sup>!</sup> : Applications No. A/NE-TKL/671 and A/NE-TKL/758 involve the same site.
- <sup>@</sup> : Applications No. A/NE-TKL/743 and A/NE-TKL/690 (rejected application) involve the same site.
- <sup>\$</sup> : Applications No. A/NE-TKL/707 and A/NE-TKL/821 involve the same site.
- <sup>%</sup> : Applications No. A/NE-TKL/714 and A/NE-TKL/805 involve the same site.
- <sup>^</sup> : Applications No. A/NE-TKL/724 and A/NE-TKL/745 involve the same site.

## **Rejected Application**

<b>Application No.</b>	<b>Uses/ Development</b>	<b>Date of Consideration</b>	<b>Rejection Reasons</b>
A/NE-TKL/690 <sup>@</sup>	Proposed Temporary Open Storage of Construction Machineries with Ancillary Site Office for a Period of 3 Years	14.1.2022	R1-R2

<sup>@</sup> : Applications No. A/NE-TKL/690 and A/NE-TKL/743 (approved application) involve the same site.

### **Rejection Reasons**

- R1. The proposed development was not in line with the planning intention of the “Agriculture” zone, which was primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes and to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes. There was no strong justification in the submission for a departure from such planning intention, even on a temporary basis.
- R2. The applicant failed to demonstrate that the proposed development would not cause adverse traffic impact on the surrounding areas.

**Detailed Comments from Relevant Government Departments**

**1. Traffic**

Comments of the Chief Highway Engineer/New Territories East, Highways Department (CHE/NTE, HyD):

- no comment on the application from highways maintenance point of view;
- the existing local access road connecting the application site (the Site) to Ping Che Road is not under the maintenance of HyD; and
- his advisory comments are at **Appendix VI**.

**2. Drainage**

Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD):

- no objection to the application from public drainage viewpoint;
- should the application be approved, conditions should be included to request the applicant to submit and implement a drainage proposal for the Site to ensure that it will not cause adverse drainage impact on the adjacent area, and the implemented drainage facilities at the Site shall be maintained at all times during the planning approval period;
- the Site is in an area where no public sewerage connection is available. The Environmental Protection Department should be consulted regarding the sewage treatment/disposal facilities for the applied use; and
- her advisory comments are at **Appendix VI**.

**3. Environment**

Comments of the Director of Environmental Protection (DEP):

- since no heavy vehicle nor dusty operation is involved, he has no objection to the application from the environmental planning perspective;
- no environmental complaint against the Site was received in the past three years; and
- his advisory comments are at **Appendix VI**.

**4. Fire Safety**

Comments of the Director of Fire Services (D of FS):

- no in-principle objection to the proposal subject to fire service installations and water supplies for firefighting being provided to his satisfaction; and
- his advisory comments are at **Appendix VI**.

## 5. Building Matters

Comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):

- no objection to the application;
- there is no record of approval granted by the Building Authority (BA) for the existing structures at the Site;
- it is noted that four structures and land filling are proposed on the Site. Before any new building works are to be carried out on the Site, prior approval and consent of the BA should be obtained unless they are exempted building works or commenced under the simplified requirement under the Minor Works Control System, otherwise they are unauthorised building works under the Buildings Ordinance (BO). An Authorised Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO; and
- his advisory comments are at **Appendix VI**.

## 6. Other Departments

The following government departments have no objection to/no comments on the application:

- (a) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (b) Project Manager (North), Civil Engineering and Development Department (PM(N), CEDD);
- (c) Head of the Geotechnical Engineering Office, CEDD (H(GEO), CEDD); and
- (d) District Officer (North), Home Affairs Department (DO(N), HAD).

**Recommended Advisory Clauses**

- (a) to resolve any land issues relating to the applied use with the concerned owner(s) of the application site (the Site);
- (b) prior planning permission should have been obtained before commencing the applied use at the Site;
- (c) failure to reinstate the Site as required under the relevant approval condition upon expiry of the planning permission might constitute an unauthorized development under the Town Planning Ordinance and be subject to enforcement and prosecution actions;
- (d) to note the comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD) that:

- (i) the Site comprises Old Schedule Agricultural Lots held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government. The proposed ingress/egress of the Site is required to pass through Government land (GL) but no right of access via GL is granted to the Site;
- (ii) the following irregularity covered by the planning application have been detected by his office:

unauthorised structures within Lots 600 S.D, 601 S.A, 601 S.B, 601 S.C and 601 S.H all in D.D. 82 covered by the planning application

there are unauthorised structures on Lots 600 S.D, 601 S.A, 601 S.B, 601 S.C and 601 S.H all in D.D. 82. The lot owners should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice;

there are unauthorised structures on Lots 600 S.C, 601 S.A and 601 S.B all in D.D. 82 which are already subject to lease enforcement actions according to case priority. The lot owners should rectify the lease breaches as demanded by LandsD;

- (iii) the following irregularity not covered by the planning application have been detected by his office:

unauthorised structures within Lots 598 and 600 S.B both in D.D. 82 not covered by the planning application

there are unauthorised structures on Lots 600 S.D, 601 S.A, 601 S.B, 601 S.C and 601 S.H all in DD. 82 extended from Lots 598 and 600 S.B both in DD. 82 which are not covered by the planning application. The lot owners should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice;

- (iv) erection of unauthorised structures should not be encouraged. The lot owner(s) should remove all the unauthorised structures immediately;
- (v) the lot owners/applicant shall either (i) remove the unauthorised structures not covered by the planning application immediately; or (ii) include the unauthorised structures in the

planning application for the further consideration by the relevant departments and, subject to the approval of the Town Planning Board to the planning application which shall have reflected the rectification or amendment as aforesaid required, apply to his office for a Short Term Waiver (STW) to permit the structures erected. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that it will be approved. The STW, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of waiver fee and administrative fee as considered appropriate to be imposed by LandsD. In addition, LandsD reserves the right to take enforcement action against the lot owner(s)/applicant for any breach of the lease conditions, including the breach(es) already in existence or to be detected at any point of time in future; and

- (vi) the applicant should comply with all the land filling requirements imposed by relevant Government departments. GL should not be disturbed unless with prior approval;
- (e) to note the comments of the Commissioner for Transport (C for T) that the proposed vehicular access road between Ping Che Road and the Site is not managed by the Transport Department (TD). The land status of the local access road should be checked with the LandsD. Moreover, the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities. Sufficient manoeuvring space shall be provided within the Site. No vehicle is allowed to queue back to or reverse onto/ from public road at any time during the planning approval period;
- (f) to note the comments of the Chief Highway Engineer/New Territories East, Highways Department (CHE/NTE, HyD) that:
  - (i) the access arrangement and swept path analysis should be commented by TD;
  - (ii) HyD is not/shall not be responsible for the maintenance of any access connecting the Site and Ping Che Road; and
  - (iii) adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains;
- (g) to note the comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) that:
  - (i) the Site is in an area where no public sewerage connection is available. The Environmental Protection Department should be consulted regarding the sewage treatment/disposal facilities for the applied use;
  - (ii) the applicant should be advised the following general requirements in the drainage proposal:
    - surface channel with grating covers should be provided along the site boundary;
    - a drainage plan should be provided clearly showing the size, levels and routes of the proposed drainage. The details (invert level, gradient, general sections, etc.) of the proposed drain/surface channel, catchpits and the discharge structure shall be provided;

- the cover levels of proposed channels should be flush with the existing adjoining ground level;
  - a catchpit with covers should be provided where there is a change of direction of the channel/drain. The details of the catchpit with covers shall be provided;
  - catchpits with sand trap shall be provided at the outlets of the proposed drainage system. The details of the catchpit with sand trap should be provided;
  - the applicant should check and ensure that the existing drainage downstream to which the proposed connection will be made have adequate capacity and satisfactory condition to cater for the additional discharge from the Site. The applicant should also ensure that the flow from the Site will not overload the existing drainage system;
  - the applicant is reminded that where walls are erected or kerbs are laid along the boundary of the Site, peripheral channels should be provided on both sides of the walls or kerbs, and/or adequate openings should be provided at the walls/kerbs to allow existing overland flow passing through the Site to be intercepted by the drainage system of the Site with details to be agreed by DSD, unless justified not necessary;
  - the applicant is reminded that all existing flow paths as well as the run-off falling onto and passing through the Site should be intercepted and disposed of via proper discharge points. The applicant shall also ensure that no works, including any site formation works shall be carried out as may adversely interfere with the free flow condition of the existing drains, channels and watercourses on or in the vicinity of the Site any time during or after the works;
  - the proposed drainage works, whether within or outside the site boundary, should be constructed and maintained properly by the applicant and rectify the system if it is found to be inadequate or ineffective during operation at the applicant's own expense;
  - for works to be undertaken outside the lot boundary, the applicant should obtain prior consent and agreement from DLO/N, LandsD and/or relevant private lot owners;
  - the applicant should make good all the adjacent affected areas upon the completion of the drainage works;
  - the applicant shall allow all time free access for the Government and its agent to conduct site inspection on the applicant's completed drainage works;
  - the applicant and the successive lot owners shall allow connections from the adjacent lots to the completed drainage works on GL when so required; and
  - photos should be submitted clearly showing the current conditions of the area around the Site, the existing drainage/flowpaths around the Site, the proposed drainage from the Site to the downstream existing watercourse and the existing watercourse at about 20m intervals. The locations of the camera and the direction of each photo should also be indicated on a plan;
- (h) to note the comments of the Director of Environmental Protection (DEP) that the applicant should observe the requirements of the 'Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites' and, in case toilet is provided, to provide suitable sewage treatment facilities as required under Professional Persons Environmental Consultative

Committee Practice Notes PN 1/23 'Drainage Plans subject to Comment by the Environmental Protection Department' and are duly certified by an Authorised Person (AP) or employ licensed waste collector to regularly collect and properly dispose of the sewage collected in the proposed toilet;

- (i) to note the comments of the Director of Fire Services (D of FS) that:
  - (i) in consideration of the design/nature of the proposal, fire service installations (FSIs) are anticipated to be required. The applicant is advised to submit relevant layout plans incorporated with the proposed FSIs to his department for approval;
  - (ii) the applicant should be advised that the layout plans should be drawn to scale and depicted with dimensions and nature of occupancy, the location of the proposed FSIs to be installed should be clearly marked on the layout plans, and licensing requirements, if any, would be formulated upon receipt of formal application via the Licensing Authority; and
  - (iii) if the proposed structures are required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans;
- (j) to note the comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that:
  - (i) it is noted that four structures and land filling are proposed on the Site. Before any new building works are to be carried out on the Site, prior approval and consent of the Building Authority (BA) should be obtained unless they are exempted building works or commenced under the simplified requirement under the Minor Works Control System, otherwise they are unauthorised building works (UBW) under the BO. An AP should be appointed as the co-ordinator for the proposed building works in accordance with the BO;
  - (ii) the applicant's attention is drawn to the following points:
    - the Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Buildings (Planning) Regulation (B(P)R) respectively;
    - the Site does not abut on a specified street of not less than 4.5m wide and its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at building plan submission stage;
    - if any existing structure is erected on leased land without the approval of the BA, they are UBW under the BO and should not be designated for any proposed use under the application;
    - for UBW erected on leased land, enforcement action may be taken by BD to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the Site under the BO;
    - before any new building works (including containers/open sheds as temporary buildings, demolition and land filling, etc.) are to be carried out on the Site, prior approval and consent of the BA should be obtained, otherwise they are UBW under the BO. An AP should be appointed as the co-ordinator for the proposed building works in accordance with the BO;

- any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the control of Part VII of the B(P)R;
  - in general, there is no requirement under the BO in respect of provision of car parking spaces for a proposed development. However, the applicant's attention is drawn to the provision of accessible car parking spaces designated for the use of persons with a disability as per the requirements under Regulation 72 of the B(P)R and Division 3 of Design Manual: Barrier Free Access 2008;
  - the applicant's attention is drawn to the provision under Regulations 40 and 41 of the Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulation in respect of disposal of foul water and surface water respectively; and
  - detailed checking under the BO will be carried out at the building plan submission stage; and
- (k) to note the comments of the Project Manager (North), Civil Engineering and Development Department (PM(N), CEDD) that the applied use is located within the proposed New Territories North (NTN) New Town under the Planning and Engineering (P&E) Study for NTN New Town and Man Kam To. The preliminary development proposal for NTN New Town was released in December 2024. The applied use falls within the proposed boundary of the Priority Development Area (PDA) in NTN New Town. Government-initiated works for the PDA may commence in 2028/29 the earliest. Hence, subject to the land use planning in the P&E Study, the applied use would need to be vacated for the site formation works. The applicant is advised to take account of the above if the applied use is pursued.

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

**To : Secretary, Town Planning Board**

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

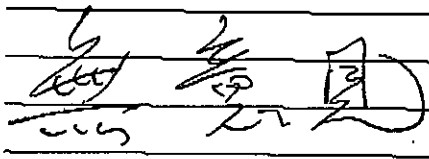
By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/NE-TKL/836

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)



\_\_\_\_\_

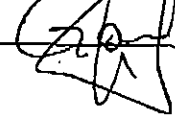
\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

「提意見人」姓名/名稱 Name of person/company making this comment 侯志強議員

簽署 Signature 

日期 Date 2026. 4. 8

Urgent Return receipt Expand Group Restricted Prevent Copy

2

**tpbpd/PLAND**

---

寄件者: [REDACTED]  
寄件日期: 2026年04月17日星期五 3:59  
收件者: tpbpd/PLAND  
主旨: A/NE-TKL/836 DD 82 Lei Uk  
類別: Internet Email

Dear TPB Members,

Despite its history 786 was approved 24 Jan 205 and revoked a year later for failure to fulfill multiple conditions.

Now the site will conveniently be taken over for a tree recycling operation.

Applied use: Open Storage of Timber and Workshop / 6 Vehicle Parking / **Filling of Land**

While fully supporting green initiatives one has to question why this 'green' operation does not focus on appropriately zoned lots instead of being a part of the cumulative assault on 'Agriculture' land achieved via false statements and manipulation of the system.

In addition members should question if any enforcement was taken re the unapproved filling in of the site that should have been restored by previous tenant.

Mary Mulvihill

---

**From:** [REDACTED]  
**To:** tpbpd <tpbpd@pland.gov.hk>  
**Date:** Monday, 30 December 2024 3:22 AM HKT  
**Subject:** A/NE-TKL/786 DD 82 Lei Uk

A/NE-TKL/786

Lots 600 S.C, 600 S.D, 600 RP, 601 S.A, 601 S.B, 601 S.C, 601 S.D, 601 S.E, 601 S.F, 601 S.G (Part), 601 S.H (Part) and 601 RP (Part) in D.D. 82, Lei Uk, Ta Kwu Ling

Site area : About 1,565.12sq.m

Zoning: "Agriculture"

Applied use: Open Storage Construction Materials / 8 Vehicle Parking

Urgent Return receipt Expand Group Restricted Prevent Copy

Dear TPB Members,

Strongest Objections. Much of the site was part of Application 726 and part of it 740 a similar FAKE RECREATIONAL USE APPLICATION. The small GB element has been excised.

Despite the clear evidence that the intention from the beginning was brownfield use, the red flags were ignored.

726 Approved 22 Dec.

The **Site was subject to active planning enforcement action against unauthorized development (UD)** for recreational use (including use for holiday camp). Enforcement Notice was issued on 6.4.2023 requiring discontinuation of the UD by 6.6.2023. Subsequent site inspections revealed that the UD had been discontinued, hence Compliance Notice was issued on 15.9.2023.

According to the applicant, a maximum of four tents for 12 visitors per day will be set up within the Site.

The uncovered area will be mainly used for hobby farm (i.e. about 926m<sup>2</sup> or 61% of the Site) and outdoor tent camping area (i.e. about 371.22m<sup>2</sup> or 25% of the site).

About 53m<sup>2</sup> (i.e. 3.5%) of the Site falls within the "GB" zone, which is considered as minor boundary adjustment and not included in the planning assessment.

This district is NOT Cat 2. There is absolutely no justification that you reward mendacity with approval. Large tracts of additional Agriculture land have already been appropriated for brownfield use in direct contradiction to government policy to phase out this land use.

The site sits between the GB zones, approval would encourage similar fake recreational use applications to pave the way to brownfield.

Mary Mulvihill

---

**From:** [REDACTED]  
**To:** tpbpd <tpbpd@pland.gov.hk>  
**Date:** Saturday, 27 May 2023 4:26 AM HKT  
**Subject:** A/NE-TKL/726 DD 82 Lei Uk GB

A/NE-TKL/726

Lots 600 S.A, 600 S.B, 600 S.C, 600 S.D, 600 RP, 601 S.A, 601 S.B, 601 S.C, 601 S.G, 601 S.H and 601 RP in D.D. 82, Lei Uk, Ta Kwu Ling

Site area : About 1,555sq.m

Urgent Return receipt Expand Group Restricted Prevent Copy

Zoning: "Agriculture" and "Green Belt"

Applied use: Hobby Farm / 10 Tent Holiday Camp / ??? Vehicle Parking

Dear TPB Members,

Strong Objections, this is an application to legitimize extensive damage to both AG and GB zonings with all vegetation stripped from the site. It is quite clear that at one point the lots were covered in trees and plants.

It appears to be an extension to Uncle B Farm camping ground <https://www.uncleb-farm.com/>.

This appears to be operating without the requisite approval:

No indication of arrangements for toilets, waste water, drainage, showers, etc. 50 people produce a lot of sewerage and waste matter. No vehicular access to allow the operation of mobile loos.

Not only should members reject the application, they should question what action is being taken with regard to the unapproved operation on the adjoining lots.

Mary Mulvihill