

**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, 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;
 - (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; and
 - (e) Taking into account the demand for cross-boundary parking facilities, applications for such use at suitable sites in areas of close proximity to the boundary crossing points, such

as in the San Tin area, particularly near the existing cross-boundary link in Lok Ma Chau, may also be considered. Notwithstanding the criteria set out in paragraphs 2.1(c) and (d) above, application of such nature will be assessed on its own merits, including its nature and scale of the proposed use and the local circumstances, and subject to satisfactory demonstration that the proposed use would not have adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas, and each case will be considered on its individual merits.

2. In assessing applications for open storage and port back-up uses, the other major relevant assessment criteria are also summarized as follows:
 - (a) port back-up sites and those types of open storage generating adverse noise, air pollution, 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.

**Similar s.16 Applications for Temporary Open Storage
in the vicinity of the Site within the “Agriculture” zone in the Past Five Years**

Approved Applications

No.	Application No.	Uses/Developments	Date of Consideration
1	A/NE-HLH/51* ¹	Proposed Temporary Warehouse and Open Storage of Construction Machinery and Construction Materials for a Period of 3 Years	27.8.2021 (Revoked on 27.5.2023)
2	A/NE-HLH/54	Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	26.8.2022 (Revoked on 26.2.2024)
3	A/NE-HLH/55* ²	Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	26.8.2022 (Revoked on 26.2.2024)
4	A/NE-HLH/59* ³	Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	3.2.2023 (Revoked on 3.8.2024)
5	A/NE-HLH/60	Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	9.6.2023 (Revoked on 9.12.2024)
6	A/NE-HLH/61* ⁴	Temporary Open Storage with Ancillary Parking of Vehicles for a Period of 3 Years	24.11.2023 (Revoked on 24.8.2025)
7	A/NE-HLH/64* ⁴	Proposed Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	22.9.2023 (Revoked on 3.11.2023)
8	A/NE-HLH/66	Proposed Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	22.12.2023 (Revoked on 22.6.2025)
9	A/NE-HLH/68* ¹	Temporary Open Storage and Warehouse of Construction Machinery and Construction Materials for a Period of 3 Years	24.5.2024
10	A/NE-HLH/70* ⁴	Proposed Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years	19.4.2024 (Revoked on 19.1.2026)
11	A/NE-HLH/71	Temporary Open Storage and Warehouse of Construction Machinery for a Period of 3 Years and Associated Filling of Land	10.5.2024 (Revoked on 10.11.2025)
12	A/NE-HLH/75	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years	6.12.2024

No.	Application No.	Uses/Developments	Date of Consideration
13	A/NE-HLH/76 ^{*2}	Temporary Open Storage of Construction Machinery and Materials for a Period of 3 Years and Associated Filling of Land	8.11.2024
14	A/NE-HLH/81	Proposed Temporary Open Storage of Construction Materials and Machineries with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	20.6.2025
15	A/NE-HLH/83	Proposed Temporary Open Storage of Construction Machinery and Materials with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	5.9.2025
16	A/NE-HLH/84	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years	5.9.2025
17	A/NE-HLH/88 ^{*3}	Proposed Temporary Open Storage of Construction Machinery and Construction Materials and Associated Filling of Land for a Period of 3 Years	23.1.2026

Remarks

*1: Application nos. A/NE-HLH/51 and A/NE-HLH/68 involved the same site.

*2: Application nos. A/NE-HLH/55 and A/NE-HLH/76 involved the same site.

*3: Application nos. A/NE-HLH/59 and A/NE-HLH/88 involved the same site.

*4: Application nos. A/NE-HLH/64 and A/NE-HLH/70 involved the same site.

Government Departments' General Comments

1. Traffic

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

- no comment on the application from highways maintenance perspective; and
- his advisory comments are at **Appendix V**.

2. Drainage

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

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

3. Landscape

Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

- no adverse comment on the application from landscape planning perspective;
- based on the aerial photo of 2025, the Site is located in an area of rural inland plain landscape character comprising warehouses, temporary structures, vegetated areas, tree clusters and farmlands. The proposed uses are considered not entirely incompatible with the surrounding environment;
- with reference to site photos taken on 12.5.2026 and site visit conducted on 20.5.2026, the Site was largely covered by self-seeded vegetation of grass and common species. No distinctive landscape resources and mature trees were observed on it. Significant adverse landscape impact arising from the application is not anticipated; and
- her advisory comments are at **Appendix V**.

4. **Fire Safety**

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

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

5. **Building Matters**

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

- no objection to the application;
- as there is no record of approval granted by the Building Authority (BA) for the existing structures at the Site, he is not in a position to offer comments on their suitability for the proposed uses;
- it is noted that four structures (one structure is under the shelter) and land filling are proposed on the Site. Before any new building works are to be carried out on 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 unauthorized building works under the Buildings Ordinance (BO). An Authorized 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 V**.

6. **Other Departments**

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

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

Recommended Advisory Clauses

- (a) failure to reinstate the application site (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;
- (b) to resolve any land issue relating to the development with other concerned owners of the Site;
- (c) to note the following comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD) that:
- (i) the Site comprises Old Schedule Agricultural Lot 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. According to the vehicular access plan of the planning statement, the vehicular access is required to pass through other private lots, the applicant shall make their own arrangement;
 - (ii) no consent is given for inclusion of Government Land (GL) (about 2,654m² as mentioned in the Application Form) in the Site;
 - (iii) a structure on Lot 286 in D.D. 87 is covered by Letter of Approval (LoA) No. 3697 for the purpose of chicken shed and shade attached to chicken shed;
 - (iv) the following irregularity covered by the planning application has been detected by his office
 - Unauthorized structure within Lot 266 in D.D. 87 covered by the planning application
there is unauthorized structure on the private lot. The lot owner(s) should immediately rectify/regularise the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice;
 - Unlawful occupation of GL adjoining Lots 266, 268, 286, 288 and 291 all in D.D. 87 covered by the planning application
the GL within the Site (about 2,654m² as mentioned in the Application Form) has been fenced off or illegally occupied without any permission. Any occupation of GL without Government's prior approval is an offence under the Land (Miscellaneous Provisions) Ordinance (Cap. 28). LandsD objects to the planning application since there is illegal occupation of GL which regularization would not be considered according to the prevailing land policy. The lot owner(s) should immediately cease the illegal occupation of GL as demanded by LandsD. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice.
 - (v) the following irregularities not covered by the planning application have been detected by his office:
 - Unauthorized structures within Lot 286 in D.D. 87 not covered by the planning application
there are unauthorized structures on the said private lots which is not covered by the planning application. The lot owner(s) should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the

breaches without further notice;

- Unlawful occupation of GL adjoining Lots 286 and 288 both in D.D. 87 not covered by the planning application

the GL adjoining the said private lots has been fenced off or illegally occupied without permission. The GL being illegally occupied is not included in the application. Any occupation of GL without Government's prior approval is an offence under Cap. 28. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice;

- (vi) the lot owner(s) shall apply to his office for Short Term Waiver (STW) to permit the proposed structures. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that they 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 administration 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 land control action for any unlawful occupation of GL. Besides, given the proposed uses are temporary in nature, only erection of temporary structures will be considered;
- (vii) unless and until the unauthorized structure(s) and unlawful occupation of GL are duly rectified by the lot owner(s)/applicant, his office has objection to the application and it must be brought to the attention of the Board when the application is being considered; and
- (viii) the applicant should comply with all land filling requirements imposed by relevant government departments. GL should not be disturbed unless with prior approval;
- (d) to note the comments of the Director of Agriculture, Fisheries and Conservation (DAFC) that good site practices and measure should be implemented to avoid adverse impacts on the watercourse nearby and to avoid polluting it.
- (e) to note the comments of the Commissioner for Transport (C for T) that:
 - (i) the access road connecting between the Site and Kong Nga Po Road is not managed by Transport Department.;
 - (ii) the land status of the local access road should be checked with LandsD, and the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities; and
 - (iii) sufficient manoeuvring space shall be provided within the Site; and 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) HyD is not/shall not be responsible for the maintenance of any access connecting the Site and the nearest public road; and
 - (ii) 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 Director of Environmental Protection (DEP) that:
- (i) the applicant should follow the requirements of the 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites' issued by the Environmental Protection Department (EPD);
 - (ii) implement relevant mitigation measures listed in the Recommended Pollution Control Clauses for Construction Contracts¹ during land filling; and
 - (iii) provide suitable sewage treatment facilities as required under ProPECC PN 1/23 'Drainage Plans subject to Comment by the EPD and are duly certified by an Authorized Person (AP);
- (h) to note the comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. The applicant should seek approval for any proposed tree works from relevant government departments prior to commencement of the works;
- (i) 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 applicant should follow the requirements of EPD regarding the sewage treatment/disposal facilities for the proposed uses;
 - (ii) to note the following comments on the drainage proposal:
 - regarding the extreme intensity = i, please justify the duration (min) of 30 min adopted in the calculation;
 - please indicate the water level of existing watercourse in Drawing No. HLH003;
 - please supplement photos showing current conditions from the Site to the downstream existing watercourse at about 20m intervals. The locations of the camera and the direction of each photo should also be indicated on a plan;
 - 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. He should also ensure that the flow from the Site will not overload the existing drainage system;
 - where walls are erected or kerbs are laid along the boundary of the same, 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;
 - 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

¹ Website of Recommended Pollution Control Clauses for Construction Contracts:
https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/guide_ref/rpc.html

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 his/her 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;
 - to make good all the adjacent affected areas upon the completion of the drainage works;
 - to allow all time free access for the Government and its agent to conduct site inspection on his completed drainage works; and
 - the applicant and the successive lot owners shall allow connections from the adjacent lots to the completed drainage works on GL when so required;
- (j) to note the comments of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD) that if the applicant needs to extend his inside services to the nearest suitable government water mains for connection of water supply to the development, he shall resolve any land matter (such as private lots) associated with provision of water supply and shall be responsible for the construction, operation and maintenance of the inside services within the private lots to WSD's standards;
- (k) to note the comments of the Director of Fire Services (D of FS) that:
- (i) to noted the following comments on the fire service installations (FSI) proposal:
 - for the site office, the stand-alone fire detectors shall be provided in accordance with the Stand-alone Fire Detector General Guidelines on Purchase, Installation & Maintenance [Sep 2021]; and
 - in relation to above, if two or more stand-alone fire detectors are installed in an enclosed structure, all detectors shall be interconnected such that when one of the detectors is triggered, all connected detectors shall sound an alarm simultaneously; and
 - (ii) 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;
- (l) to note the comments of the Project Manager (North), Civil Engineering and Development Department that:
- (i) the Site 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; and
 - (ii) the Site also 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 uses, if approved, would need to be vacated for the site formation works. The applicant should take account of the above if the proposed uses are pursued; and

- (m) to note the following comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that:
- (i) 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 Building (Planning) Regulation (B(P)R);
 - (ii) the Site is not abutting on a specified street having a width not less than 4.5m, the development intensity shall be determined by the Building Authority (BA) under Regulation 19(3) of B(P)R at building plan submission stage;
 - (iii) if any existing structure is erected on leased land without the approval of the BA, they are unauthorized building works (UBW) under the BO and should not be designated for any proposed uses under the application;
 - (iv) 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;
 - (v) 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;
 - (vi) any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the contrail of Part VII of the B(P)R;
 - (vii) to note that in general there is no requirement under the BO in respect of provision of car parking spaces for the proposed uses. 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;
 - (viii) to pay attention to the provision under Regulations 40 and 41 of the Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulations in respect of disposal of foul water and surface water respectively;
 - (ix) the 12m high shelter for storage and rural workshop is considered excessive. It should be justified upon formal plan submission to BD; and
 - (x) detailed checking under the BO will be carried out at building plan submission stage.

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月28日星期四 20:56
收件者: tpbpd/PLAND
主旨: KFBG's submissions on three planning applications
附件: 260528 s16 MKT 64.pdf; 260528 s16 HLH 90.pdf; 260528 s16 FTA 276.pdf
類別: Internet Email

A/NE-HLH/90

Dear Sir/ Madam,

Attached please see our submissions regarding three applications. There are three pdf files attached to this email. If you cannot see/ download/ open these files, please notify us through email.

Please do not disclose our email address.

Thank You and Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

The Secretary,
Town Planning Board,
15/F, North Point Government Offices,
333, Java Road, North Point,
Hong Kong.
(Email: tpbpd@pland.gov.hk)

28th May, 2026.

By email only

Dear Sir/ Madam,

**Proposed Temporary Open Storage of Construction Materials and Machineries and
Rural Workshop with Ancillary Facilities and Associated Filling of Land and Pond
for a Period of 3 Years**
(A/NE-HLH/90)

1. We refer to the captioned.
2. We urge the Board to investigate with relevant authorities the current site status and to also verify with them whether there are any ongoing unauthorised activities, uses, or enforcement cases associated with the application site. If any such issues are identified, we recommend that the Board carefully consider whether it is appropriate to approve the application.
3. We urge the Board to reject this application as it is not in line with the planning intention of the Agriculture zone. If the Board decides to approve the application, we would also like the Board to consider whether the site needs to be reinstated after the planning permission expires and, if so, whether this should be set as an approval condition.
4. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden



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類別: csmng, Internet Email

Dear Sir/Madame,

Attached please find our submission regarding the planning application **A/NE-HLH/90**.

Thank you for your attention.

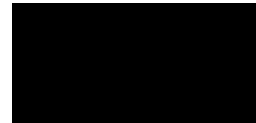
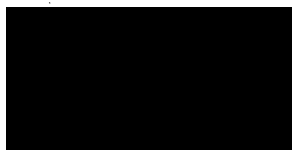
Yours faithfully,
Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF-Hong Kong

Registered Name 註冊名稱: World Wide Fund For Nature Hong Kong 世界自然(香港)基金會 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司). This email (including any attachments) is intended for the use of the designated recipient(s) only, which may contain confidential, non-public, proprietary information, and/or be protected by the attorney-client or other privilege. Any unauthorized reading, distribution, copying, or other use of this communication is strictly prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or believe you have received this email in error, please notify the sender immediately and delete this email from your computer system. This email and any attachments are checked for viruses and other malicious software ("malware"). However, the sender does not warrant, represent, or guarantee in any way that this communication is free from malware or potentially damaging defects. The sender disclaims all liability for any errors, omissions, or damages arising out of or in connection with the use or reliance on the information contained in this email.



世界自然基金會
香港分會

WWF-Hong Kong



22 May 2026

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong
(Email: tpbpd@pland.gov.hk)

By E-mail ONLY

Dear Chair and Board Members,

**RE: Proposed Temporary Open Storage of Construction Materials and
Machineries and Rural Workshop with Ancillary Facilities and Associated Filling
of Land and Pond for a Period of 3 Years in an "AGR" zone in Hung Lung Hang in
Ta Kwu Ling (A/NE-HLH/90)**

We would like to show concern to the captioned.

Suspected unlawful development within the application site

According to Google's aerial imagery from 2018, 2020 and 2024, the 2018 image indicates that the application site remained largely intact and vegetated (Figure 1). However, the 2020 aerial image shows that extensive vegetation clearance had taken place in the southern portion of the application site. Furthermore, in 2024, the land use of Lot 266 (Part) in D.D. 87 appeared to have been converted to open storage.

Based on the records available on the Town Planning Board's portal, no planning application for such land use has been approved. While the current land use status of the application site cannot be fully ascertained, it would be appreciated if the Town Planning Board could request relevant government departments to investigate any suspected unauthorized use or development within the site.

Should any unauthorized development be confirmed, we respectfully request that the Town Planning Board reject the application to avoid legitimising unlawful habitat destruction prior to the granting of planning permission.

together possible

贊助人：中華人民共和國
香港特別行政區行政長官
李家超先生、大紫荊勳章、SBS, PDSM
主席：白丹尼先生
行政總裁：黃碧茵女士

核數師：富睿瑪濶會計師事務所有限公司
公司秘書：嘉信秘書服務有限公司
義務司庫：匯豐銀行
註冊慈善機構

Patron: The Honourable John Lee Ka-chiu, GBM, SBS, PDSM
The Chief Executive, Hong Kong Special Administrative Region
People's Republic of China
Chairman: Mr Daniel R Bradshaw
CEO: Ms Nicole Wong

Auditors: Forvis Mazars CPA Limited
Company Secretary:
McCabe Secretarial Services Limited
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

註冊名稱 Registered Name: 世界自然(香港)基金會 World Wide Fund For Nature Hong Kong
(於香港註冊成立的擔保有限公司 Incorporated in Hong Kong with limited liability by guarantee)

We would be grateful if our comment could be considered by the Town Planning Board.

Kind regards,



Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF Hong Kong
[REDACTED]

Figure 1. Aerial view of application site taken in 2018, showing dense vegetation covering the Application Site

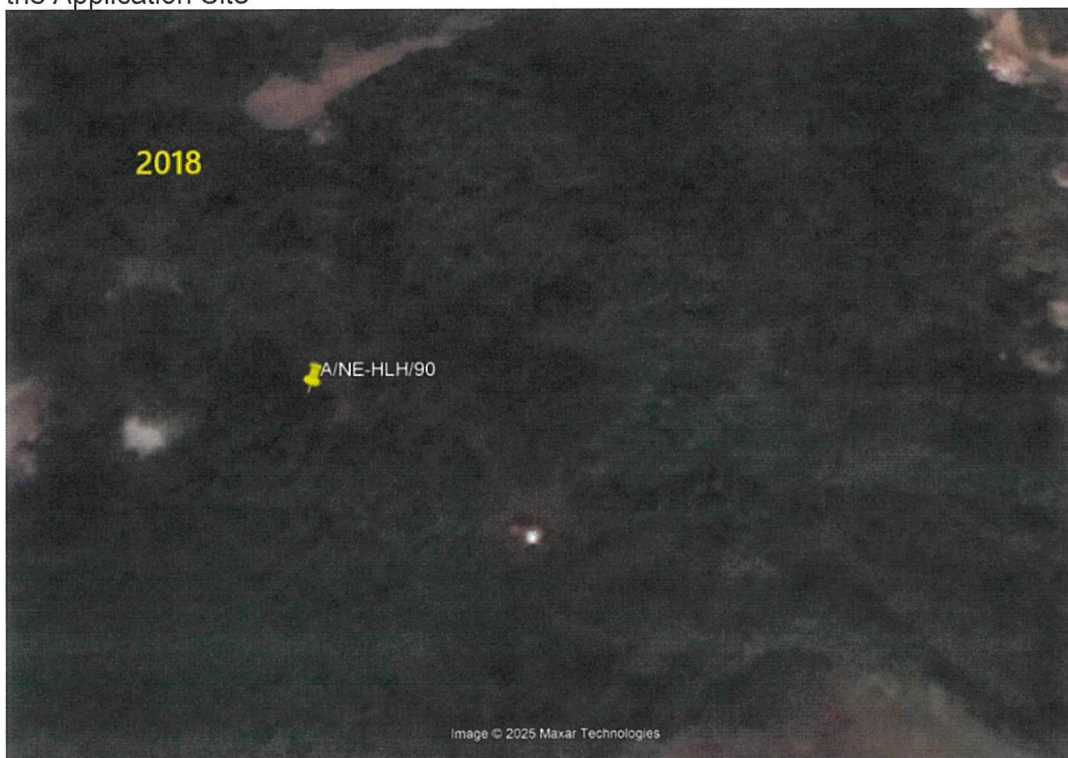


Figure 2. Aerial view of application site taken in 2020, indicating that substantial vegetation clearance had taken place in the southern portion



Figure 3. Aerial view of application site taken in 2024 when the upper-northern part ie Lots 266(Part) in D.D. 87 of the Application Site had likely undergone a change in land use to open storage

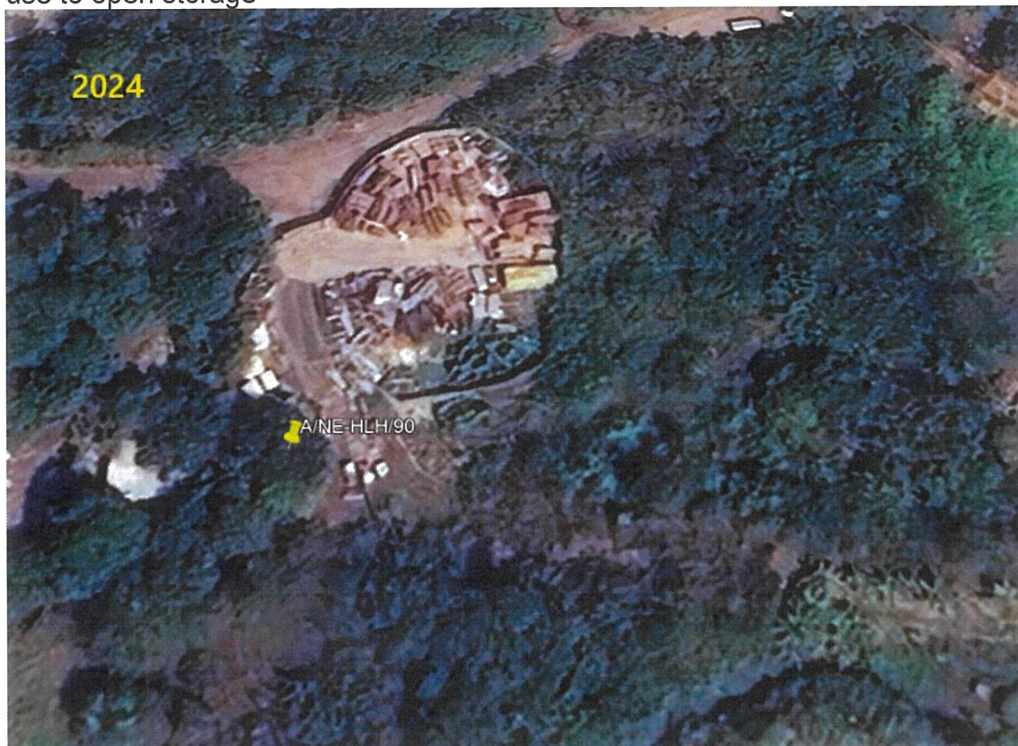


Image sources: Google Earth (Accessed on 22 May 2026)

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年06月02日星期二 0:21
收件者: tpbpd/PLAND
主旨: A/NE-HLH/90 DD 87 Hung Lung Hang
類別: Internet Email

A/NE-HLH/90

Lots 266(Part), 268(Part), 286(Part), 287(Part), 288(Part), 291(Part) in D.D. 87 and Adjoining Government Land, Hung Lung Hang

Site area: About 7,216sq.m Includes Government Land of about 2,654sq.m

Zoning: "Agriculture"

Applied use: Open Storage of Construction Machinery and Materials / Workshop / 7 Vehicle Parking / **Filling of Land**

Dear TPB Members,

74 was withdrawn, back with a much larger footprint and a large amount of GL.

A small part of the 74 site was approved under 83, members ignored the objections;

Comments of the Director of Agriculture, Fisheries and Conservation (DAFC):

(a) he does not support the application from agricultural perspective as the Site possesses potential for agricultural rehabilitation;

(b) agricultural activities are active in the vicinity, and agricultural infrastructures such as road access and water source are also available. The Site can be used for agricultural activities such as open-field cultivation, greenhouses and plant nurseries, etc.; and

(c) should the application be approved, the applicant is advised to implement good site practice and precautionary measures **to avoid adverse impacts on vegetation on Government land as well as nearby watercourses and ponds as far as possible.**

The issues outlined deserve to be properly considered in view of the large amount of GL and the location along the banks of the Ping Yuen River. The lots are located in between two clusters of 'GB' so filling in such a large amount of land is a cause for concern with regard to the function of the local drainage capacity.

Urgent Return receipt Expand Group Restricted Prevent Copy
Who will take responsibility for the inevitable negative impact of plans like this?

Previous objections applicable and upheld.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Wednesday, 10 April 2024 3:16 AM HKT
Subject: A/NE-HLH/74 DD 87 Hung Lung Hang

A/NE-HLH/74

Lots 289 and 292 (Part) in D.D. 87 and Adjoining Government Land, Hung Lung Hang

Site area: About 2,709sq.m Includes Government Land of about 1,461sq.m

Zoning: "Agriculture"

Applied use: Open Storage of Construction Machinery and Materials / 6 Vehicle Parking / **Filling of Land**

Dear TPB Members,

Strong objections, no previous history of approvals, two sites not adjoining, more than 50% of the lots is Government Land and the justification that approval has been given for similar operations is unacceptable. Moreover, access is over government land, a hillock is to be excavated and there is clearly an issue with regard to open storage alongside the Ping Yuen river.

To further approve tree felling and encroachment and filling in of land along the river course is unacceptable. Reading the minutes indicates that there is no consideration re the long term negative impact of filling in significant tracts of land when drainage will be a major consideration re the looming issues of climate change. No data provided on number of trees to be removed.

The administration pledged to phase out the inefficient land use brownfield operations via the development of high rise, high tech and custom built industrial parks. But the reality is that there is no onus on operators to upgrade and invest in such premises when under the 'streamline' formula EVERY APPLICATION FOR FILLING IN OF AGRICULTURE LAND IS AUTO APPROVED.

Mary Mulvihill

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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

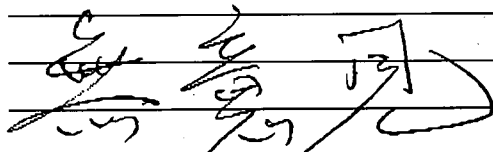
By e-mail : tpbpd@pland.gov.hk

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

A/NE-HLH/90

意見詳情 (如有需要，請另頁說明)

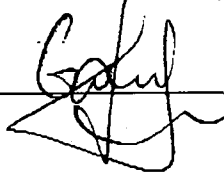
Details of the Comment (use separate sheet if necessary)



「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

2026.5.13