

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 Warehouse and/or Open Storage
in the vicinity of the Site within the “Agriculture” zone
in the Hung Lung Hang Area**

Approved Applications

	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 09.12.2024)
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 24.08.2025)
7	A/NE-HLH/64 ⁵	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 Construction 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 Three Years	24.5.2024
10	A/NE-HLH/70 ⁵	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 Three 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
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 (revoked on 8.5.2026)
14	A/NE-HLH/77	Proposed Temporary Container Storage Yard, Container Vehicle Park, Vehicle Repair Workshop, Logistics Centre, Warehouse and	22.11.2024

	Application No.	Uses/Developments	Date of Consideration
		Open Storage of Miscellaneous Goods with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	
15	A/NE-HLH/79	Temporary Warehouse for Storage of Office Stationery and Equipment Supplies for a Period of 3 Years	14.3.2025
16	A/NE-HLH/80	Proposed Temporary Open Storage of Construction Materials with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	11.4.2025
17	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
18	A/NE-HLH/82 ⁴	Proposed Temporary Warehouse (excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years	5.9.2025
19	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
20	A/NE-HLH/84	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years	5.9.2025
21	A/NE-HLH/85	Proposed Temporary Warehouse for Storing Car Parts with Ancillary Office and Associated Filling of Land for a Period of 3 Years	19.9.2025
22	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
23	A/NE-HLH/89	Temporary Warehouse (excluding Dangerous Goods Godown) and Open Storage of Miscellaneous Goods with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	6.2.2026
24	A/NE-HLH/90	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	26.6.2026

Remarks

*1: Applications No. A/NE-HLH/51 and A/NE-HLH/68 involve the same site.

*2: Applications No. A/NE-HLH/55 and A/NE-HLH/76 involve the same site.

*3: Applications No. A/NE-HLH/59 and A/NE-HLH/88 involve the same site.

*4: Applications No. A/NE-HLH/61 and A/NE-HLH/82 involve the same site.

*5: Applications No. A/NE-HLH/64 and A/NE-HLH/70 involve 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 to the application from public drainage viewpoint;
- should the application be approved, approval conditions should be included to request the applicants to submit and implement a drainage proposal for the application site (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;
- there are existing natural streams in the vicinity of the Site. All the proposed works in the vicinity of the rising mains should not create any adverse impacts, both during and after construction;
- the Site is in an area where no public sewerage connection is available. The Director of Environmental Protection 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 taken in 2026, the Site is located in an area of rural inland plain and miscellaneous rural fringe landscape characters comprising vegetated areas, farmlands, warehouses, temporary structures and tree clusters. The applied uses considered not entirely incompatible with the surrounding environment;
- with reference to the aerial photo, site photos taken on 5.6.2026 and site visit on 24.6.2026, the Site was largely formed. Some common tree species, and a possible mature tree with >750mm DBH were found along the southwestern site periphery. As clarified by the applicants, such trees will be retained. As stated in the application form, no tree felling will be involved. 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 structure at the Site, he is not in a position to offer comments on its suitability for the applied uses;
- it is noted that 12 structures are proposed in the application. 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 comment on/no objection to 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) prior planning permission should have been obtained before commencing the applied uses at the application site (the Site);
- (b) 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;
- (c) to note the comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD) that:
- (i) the Site comprises GL and 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 GL but no right of access via GL is granted to the Site. Besides, according to the vehicular access plan, the vehicular access is required to pass through other private lots, the applicants shall make their own arrangement;
 - (ii) no consent is given for inclusion of GL in the Site;
 - (iii) part of the structures on Lots 442 in D.D. 87 are covered by Letter of Approval No. 6420 for the purposes of watchman sheds, chicken sheds, hatchery, shade, agricultural storage and agricultural kitchen, but its conformity is subject to further investigation. His office reserves the rights to take necessary enforcement action if breach is detected;
 - (iv) the following irregularities covered by the subject planning application have been detected by his office:
 - Unauthorised structures within Lot 442 in D.D. 87 covered by the planning application

there are unauthorised structures on Lot 442 in D.D. 87. 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 Lot 442 in D.D. 87 with unauthorised structures covered by the planning application

the GL within the Site has been fenced off/illegally occupied with unauthorised structures without any permission. Any occupation of GL without Government's prior approval is an offence under the Land (Miscellaneous Provisions) Ordinance (Cap. 28). 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 subject planning application have been detected by his office:
 - Unauthorised structure(s) within Lot 442 (Part) in D.D. 87 not covered by the planning application

there are unauthorized structure(s) within the portion of Lot 442 in D.D. 87 which is not covered by the subject planning application. 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 Lot 442 in D.D. 87 with unauthorised structures covered by the planning application

the GL adjoining Lot 442 in D.D. 87 has been fenced off/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; and

- (vi) the lot owner(s)/applicants shall either remove the unauthorised structure(s) not covered by the subject planning application and cease the illegal occupation of GL immediately, or include the unauthorised structure(s) and the adjoining GL being illegally occupied in the subject planning application for further consideration by the relevant government departments and, subject to the approval of the Board to the planning application which shall have reflected the rectification as aforesaid required, apply to his office for Short Term Waiver (STW) and Short Term Tenancy (STT) to permit the proposed structures. The applications for STW and STT 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. The STW and STT, if approved, will be subject to such terms and conditions including the payment of backdated waiver fee/rent 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)/applicants 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 applied uses are temporary in nature, only erection of temporary structures will be considered;
- (d) to note the comments of the Commissioner for Transport (C for T) that the Site is connected to the public road via a section of a local access road which is not managed by the Transport Department (TD); the land status of the local access road should be checked with LandsD; the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities; sufficient manoeuvring space within the Site shall be provided; and no vehicles is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (e) to note the comments of the Chief Highway Engineer/New Territories East, Highways Department (CHE/NTE, HyD) that the proposed access arrangement should be commented by TD; HyD is not/shall not be responsible for the maintenance of any access connecting the Site to Kong Nga Po Road; and adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains;
- (f) to note the comments of the Director of Environmental Protection (DEP) that the applicant should follow the requirements of the 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites'; and provide suitable sewage treatment facilities as required under ProPECC PN 1/23 'Drainage Plans subject to Comment by the Environmental Protection Department' and are duly certified by an Authorized Person (AP) or employ licensed waste collector to regularly collect and properly dispose of the sewage collected in the proposed toilet;

- (g) 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 applicants should seek approval for any proposed tree works from relevant government departments prior to commencement of the works;
- (h) to note the following comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) that:
- (i) there are existing natural streams in the vicinity of the Site. All the proposed works in the vicinity of the rising mains should not create any adverse impacts, both during and after construction;
 - (ii) 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
 - (iii) the applicants 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;
 - to 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 applicants 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 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;
 - 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 applicants 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 applicants 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 applicants 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;
- the applicants 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;

(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 applicants should submit relevant layout plans incorporated with the proposed FSIs to his satisfaction. In addition, the applicants should note 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
- (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;

(j) to note the comments of the Project Manager (North), Civil Engineering and Development Department (PM(N), CEDD) that the applied uses are 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. While the implementation programme of NTN New Town is being formulated under the P&E Study, the site formation works will likely commence soon after the completion of detailed design in next stage. Hence, the applicants are reminded that subject to the land use planning in the P&E Study, the applied uses, if approved, may need to be vacated for the site formation works;

(k) to note the comments of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD) that if the applicants need to extend their inside services to the nearest suitable government water mains for connection of water supply to the development, they 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; and

(l) to note the following comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that:

- (i) it is noted that 12 structures are proposed in the application. Before any new building works are to be carried out on 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 unauthorized building works under the BO. An AP should be appointed as the co-ordinator for the proposed building works in accordance with the BO;
- (ii) 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);
- (iii) 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 BA under Regulation 19(3) of the B(P)R at building plan submission stage;
- (iv) 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 applied uses under the application;
- (v) 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;
- (vi) 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;
- (vii) 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;
- (viii) in general, there is no requirement under the BO in respect of provision of car parking spaces for the applied uses. However, the applicants' 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;
- (ix) the applicants' 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;
- (x) the 6.5m high warehouses are considered excessive. It should be justified upon formal plan submission to BD; and
- (xi) detailed checking under the BO will be carried out at building plan submission stage.

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tpbpd/PLAND

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寄件日期: 2026年07月02日星期四 23:10
收件者: tpbpd/PLAND
主旨: A/NE-HLH/92 DD 87 Hung Lung Hang
類別: Internet Email

A/NE-HLH/92

Lot 442 (Part) in D.D. 87 and Adjoining Government Land, Hung Lung Hang

Site area: About 6,993sq.m (Includes Government Land of about 673sq.m)

Zoning: "Agriculture"

Applied use: Warehouse / Open Storage of Construction Materials and Scrap Metal / 2 Vehicle Parking

Dear TPB Members,

Please request images of the site. It has until recently been cultivated.

Strong objections. No previous approval for brownfield use and if the site has been trashed, then it is recently. There is agricultural activity in the district.

The world is facing a food crisis, who knows when/if the Ukraine and Iran wars will be resolved.

Hong Kong has an obligation to ensure a certain percentage of local produce in line with the mandate of President Xi that China strive for self-determination with regard to the production of food.

Patriotic land owners should certainly not make any move to destroy arable land.

Members must reject this application. Turning all of the NT into one big dump was never mentioned in the grandiose development plans.

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

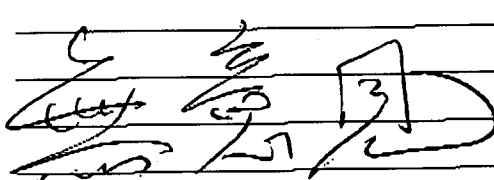
By e-mail : tpbpd@pland.gov.hk

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

A/NE-HLH/92

意見詳情 (如有需要，請另頁說明)

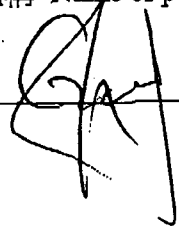
Details of the Comment (use separate sheet if necessary)



「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. 6. 18

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Dear Sir/Madame,

Attached please find our submission regarding the planning application A/NE-HLH/92.

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.



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12 June 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 Warehouse and Open Storage of Construction Materials and Scrap Metal with Ancillary Facilities for a Period of 3 Years in "Agriculture" zone in Hung Lung Hang (A/NE-HLH/92)

We would like to show deep concerns to the captioned.

Suspected unlawful development within the application site

Compared to Google's aerial images taken in 2000 to 2024, the land use of the application site was likely used as a pigsty with pig sheds built till the 2010s when the Application site then appears to be used as an open storage with metal substances scattered within the Site (Fig 1). While we do not have updated land use status nor whether suspected unlawful change of land use is underway at the application site, it would be grateful if the Town Planning Board request relevant government departments to investigate any illegal land use/development occurred in relation with the application site. If that were the case, we would like to ask Town Planning Board to reject the application so as not to legitimate such unlawful land use prior town planning approval granted.

Insufficient information to show the environmental impacts of the proposed use

It is noted that the Application Site is in proximity to the Ping Yuen River. However, the Applicant has not provided sufficient information in the submission to demonstrate that the proposed open storage use for scrap metal would not result in adverse environmental impacts. In particular, rainwater flowing over scrap metal piles may pick up pollutants and discharge them into the river. In this regard, the Applicant should be

together possible

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香港特別行政區行政長官
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主席：白丹尼先生
行政總裁：黃碧茵女士

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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

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The Chief Executive, Hong Kong Special Administrative Region
People's Republic of China
Chairman: Mr Daniel R Bradshaw
CEO: Ms Nicole Wong

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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)

requested to provide a detailed technical assessment, together with supporting evidence, to demonstrate that the proposed development would not cause any negative impacts on the water quality and ecological condition of the river.

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

Kind regards,

Mr. Tobi Lau

Senior Manager, HK Biodiversity and Conservation Policy

WWF Hong Kong

Figure 1. Aerial views of the application site in 2000 (upper left) when the Site was likely to be used as a pig farm, 2011 (upper right), 2017 (lower left) and 2024 (lower right) when the Site appeared to be used as an open storage



Image sources: Google Earth (Right). Accessed on 12 June 2026.

Figure 2. Ping Yuen River is in vicinity of the Application Site

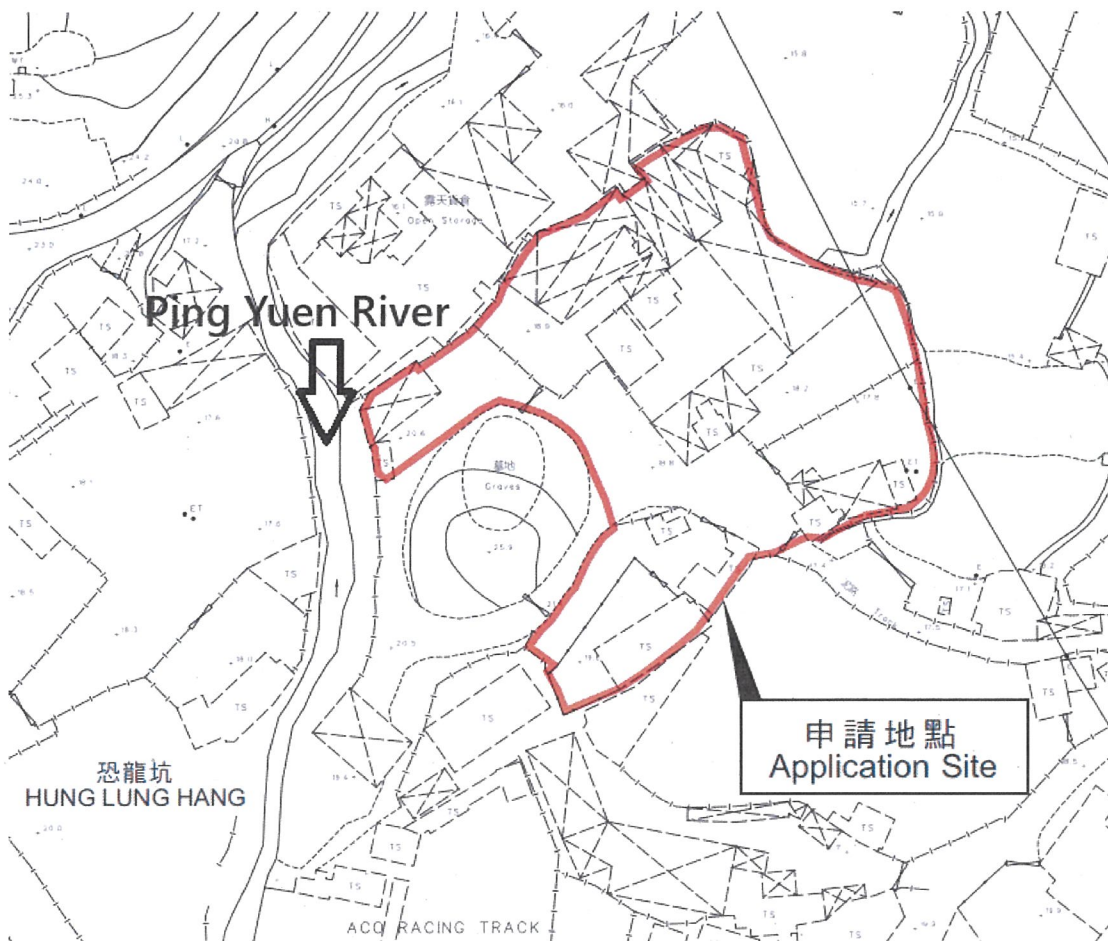


Image source: Gist of the Application

<https://www.ozp.tpb.gov.hk/api/Perm/Gist?caseNo=A%2fNE-HLH%2f92&lang=EN&ext=pdf&dType=in> Assessed on 12 June 2026.