

Previous s.16 Applications covering the Application Site (the Site)

Approved Applications

	Application No.	Use/Development	Date of Consideration
1.	A/YL-KTN/925	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Filling of Land	11.8.2023 [revoked on 11.2.2025]
2.	A/YL-KTN/928	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Filling of Land	11.8.2023 [revoked on 11.2.2025]
3.	A/YL-KTN/940	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Filling of Land	25.8.2023 [revoked on 25.2.2025]

Similar s.16 Applications within the Same “Agriculture” Zone in the Vicinity of the Site in the Past Five Years

Approved Applications

	Application No.	Use/Development	Date of Consideration
1.	A/YL-KTN/959	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Office and Open Storage or a Period of Three Years and Filling of Land	10.11.2023 [revoked on 10.5.2025]
2.	A/YL-KTN/970	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Filling of Land	19.4.2024 [revoked on 19.10.2025]
3.	A/YL-KTN/976	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Filling of Land	19.4.2024 [revoked on 19.10.2025]
4.	A/YL-KTN/988	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Office for a Period of Three Years and Filling of Land	5.4.2024 [revoked on 5.1.2026]
5.	A/YL-KTN/1000	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Associated Filling of Land	5.7.2024 [revoked on 5.1.2026]

	Application No.	Use/Development	Date of Consideration
6.	A/YL-KTN/1010	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) for a Period of Three Years and Associated Filling of Land	4.10.2024 [revoked on 4.7.2026]
7.	A/YL-KTN/1082	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) for a Period of Three Years and Associated Filling of Land	28.2.2025
8.	A/YL-KTN/1088	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) for a Period of Three Years and Associated Filling of Land	4.7.2025
9.	A/YL-KTN/1091	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Open Storage and Facilities and Associated Filling of Land for a Period of Three Years	19.9.2025
10.	A/YL-KTN/1096	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) for a Period of Three Years and Associated Filling of Land	28.3.2025
11.	A/YL-KTN/1100	Proposed Temporary Warehouse (excluding Dangerous Goods Godown) with Ancillary Office and Associated Filling of Land for a Period of Three Years	2.5.2025
12.	A/YL-KTN/1146	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of Three Years	5.9.2025
13.	A/YL-KTN/1149	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land and Pond for a Period of Three Years	24.10.2025
14.	A/YL-KTN/1190	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of Three Years	23.1.2026
15.	A/YL-KTN/1203	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of Three Years	27.3.2026
16.	A/YL-KTN/1226	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Office and Associated Filling of Land for a Period of Three Years	22.5.2026

	Application No.	Use/Development	Date of Consideration
17.	A/YL-KTN/1227	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of Three Years	22.5.2026

Rejected Applications

	Application No.	Use/Development	Date of Consideration	Rejection Reasons
1.	A/YL-KTN/989	Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of Three Years and Associated Filling of Land	4.10.2024	(1), (2), (3)
2.	A/YL-KTN/1201	Proposed Temporary Warehouse (Storage of Construction Materials) and Associated Filling of Land for a Period of Three Years	27.2.2026	(1), (2)

Rejection Reasons:

- (1) The proposed use with associated filling of land was not in line with the planning intention of the “AGR” zone. No strong planning justification had been given in the submission for a departure from the planning intention, even on a temporary basis.
- (2) The proposed use with associated filling of land was not compatible with the surrounding land uses.
- (3) The applicant failed to demonstrate that the proposed use with associated filling of land would not have adverse drainage impact on the surrounding areas.

Government Departments' General Comments

1. Traffic

Comments of the Commissioner for Transport:

- no adverse comment on the application from traffic engineering perspective; and
- advisory comments are at **Appendix IV**.

Comments of the Chief Highway Engineer/New Territories West, Highways Department:

- no in-principle objection to the application from highways maintenance point of view; and
- advisory comments are at **Appendix IV**.

2. Drainage

Comments of the Chief Engineer/Mainland North, Drainage Services Department:

- no in-principle objection to the application from drainage point of view;
- the drainage proposal submitted by the applicant is considered acceptable;
- should the application be approved, approval conditions should be stipulated requiring the implementation and maintenance of the proposed drainage facilities to the Director of Drainage Services' or the Town Planning Board's satisfaction; and
- advisory comments are at **Appendix IV**.

3. Environment

Comments of the Director of Environmental Protection:

- no objection to the application from environmental planning perspective;
- based on the applicant's submission, the proposed use would not cause traffic of heavy vehicle and dusty operation. According to his review, there are residential structures within 100m from the boundary of the Site;
- there were seven substantiated environmental complaints in relation to air nuisance received against the Site in the past three years. Nonetheless, no violation of relevant environmental ordinance was spotted; and
- advisory comments are at **Appendix IV**.

4. **Fire Safety**

Comments of the Director of Fire Services:

- no in-principle objection to the application subject to fire service installations (FSIs) and water supplies for firefighting being provided to his satisfaction;
- the FSIs proposal submitted by the applicant is considered acceptable; and
- advisory comments are at **Appendix IV**.

5. **Landscape Aspect**

Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department:

- no adverse comment on the application from landscape planning perspective;
- based on the aerial photo, the Site is situated in an area of rural inland plain landscape character comprising open storage sites/warehouses, vacant land, farmland and scattered tree groups. The proposed temporary use is not incompatible with the landscape setting in the proximity;
- with reference to the aerial photo and site photos, the Site is formed with several temporary structures and piles of construction materials on it. No tree is observed within the Site. According to the applicant's submission, no tree felling will be involved; and
- in view of the above, significant adverse landscape impact arising from the proposed use is not anticipated.

6. **Building Matters**

Comments of the Chief Building Surveyor/New Territories West, Buildings Department:

- no objection to the application; and
- advisory comments are at **Appendix IV**.

7. **District Officer's Comments**

Comments of the District Officer (Yuen Long), Home Affairs Department:

- his office has not received any comment from the locals on the application and he has no comment on the application.

8. **Other Departments**

The following government departments have no objection to/no comment on the application and their advisory comments, if any, are at **Appendix IV**:

- Project Manager (West), Civil Engineering and Development Department;

- Chief Engineer/Construction, Water Supplies Department; and
- Director of Electrical and Mechanical Services.

Recommended Advisory Clauses

- (a) the permission is given to the use and/or structures under application. It does not condone any other use(s) and/or structure(s) which currently occur on the application site (the Site) but not covered by the application. Immediate action should be taken to discontinue such use(s) and/or remove such structure(s) not covered by the permission;
- (b) should the applicant fail to comply with any of the approval conditions again resulting in revocation of the planning permission, sympathetic consideration may not be given by the Rural and New Town Planning Committee/Town Planning Board to any further application;
- (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 resolve any land issues relating to the proposed use with the concerned owner(s) and/or occupant(s);
- (e) to note the comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD) that:
 - (i) there is/are unauthorized structure(s) on Lots No. 1354 and 1373 in D.D. 109 which is/are already subject to lease enforcement actions according to case priority. The lot owner(s) should rectify/apply for regularisation on the lease breaches as demanded by LandsD; and
 - (ii) the lot owner(s) shall apply to his office for Short Term Waiver(s) (STWs) to permit the structure(s) erected within the private lots covered by the application. The application for STWs will be considered by the Government in its capacity as a landlord and there is no guarantee that they will be approved. The application, if approved, will be subject to such terms and conditions including the payment of waiver fee and administrative fee as considered appropriate by LandsD. Besides, given the proposed use is temporary in nature, only erection of temporary structure(s) will be considered;
- (f) to note the comments of the Commissioner for Transport that:
 - (i) the Site is connected to the public road network via a section of a local access road which is not managed by the Transport Department. The land status of the local access road should be checked with LandsD. Moreover, the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities accordingly;
 - (ii) sufficient manoeuvring space shall be provided within the Site; and
 - (iii) no vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;

- (g) to note the comments of the Chief Highway Engineer/New Territories West, Highways Department (HyD) that:
 - (i) HyD shall not be responsible for the maintenance of the proposed access connecting the Site and Kong Po Road, including local tracks; and
 - (ii) adequate drainage measures shall be provided to prevent surface water running from the Site to the nearby public roads and drains;
- (h) to note the comments of the Chief Engineer/Mainland North, Drainage Services Department that:
 - (i) the applicant shall implement the drainage facilities on Site in accordance with the agreed drainage proposal;
 - (ii) the detailed comments on the agreed drainage proposal previously provided to the applicant shall be taken into account in the implementation of the agreed drainage proposal and maintenance of the proposed drainage facilities;
 - (iii) the applicant should ensure that the proposed drainage facilities are adequate to collect, convey and discharge the surface runoff accrued on the Site and the overland flow intercepted from the adjacent lands. The applicant should also ensure that the existing facilities to be discharged to have sufficient capacity to cater for any additional flow generated due to the subject application;
 - (iv) the applicant shall resolve any conflict/disagreement with relevant lot owner(s) and seek LandsD's permission for laying new drains/channels and/or modifying/upgrading existing ones in other private lots or on Government land (where required) outside the Site;
 - (v) where walls or hoarding are erected are laid along the Site boundary, adequate openings should be provided to intercept the existing overland flow passing through the Site; and
 - (vi) the applicant shall be liable for any adverse drainage impact due to the proposed use;
- (i) to note the comments of the Director of Environmental Protection that:
 - (i) the applicant shall ensure that no recycling, cleansing, repairing, dismantling or other workshop activities are carried at the Site;
 - (ii) the applicant shall follow the revised 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites';
 - (iii) the applicant shall follow the relevant guidelines and requirements in relevant Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs), in particular the ProPECCPN 1/23 'Drainage Plans subject to Comment by the Environmental Protection Department';
 - (iv) the applicant shall provide adequate supporting infrastructure/facilities for proper collection, treatment and disposal of waste/wastewater generated from the proposed use; and

- (v) the applicant shall meet the statutory requirements under relevant environmental legislation;
- (j) to note the comments of the Director of Fire Services that:
 - (i) the applicant shall submit a full set of FS 251, incorporating all proposed fire service installations (FSIs), for his arrangement of the FSIs acceptance inspection; and
 - (ii) if the proposed structures are required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire services requirements will be formulated upon receipt of formal submission of general building plans;
- (k) to note the comments of the Director of Agriculture, Fisheries and Conservation that the applicant shall adopt appropriate mitigation measures to avoid causing pollution or disturbance the adjacent watercourse; and
- (l) to note the comments of the Chief Building Surveyor/New Territories West, Buildings Department (BD) that:
 - (i) it is noted that eight structures and associated filling of land are proposed in the application. 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 Building Authority (BA) should be obtained, otherwise they are unauthorized building works (UBW) under BO. An Authorized Person should be appointed as the co-ordinator for the proposed building works in accordance with 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) Regulations (B(P)R) respectively;
 - (iii) the Site does not abut a specified street of not less than 4.5m wide and its permitted development intensity shall be determined under Regulation 19(3) of B(P)R at building plan submission stage;
 - (iv) if the existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of BA, they are UBW under BO and should not be designated for any proposed use 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 BO;
 - (vi) 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 B(P)R;
 - (vii) the 8m-high warehouses are considered excessive. It shall be justified upon formal plan submission to BD; and
 - (viii) detailed checking under BO will be carried out at building plan submission stage.

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年06月18日星期四 15:44
收件者: tpbpd/PLAND
主旨: WWF s16_A_YL_KTN_1244 20260618
附件: s16_A_YL_KTN_1244 20260618 WWF.pdf

類別: Internet Email

Dear Sir/Madame,

Attached please find our submission regarding the planning application A/YL-KTN/1244.

Thank you for your attention.

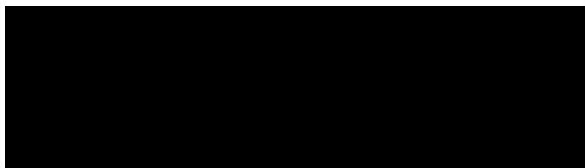
Yours faithfully,
Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF-Hong Kong

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



18 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 (Excluding Dangerous Goods Godown)
with Ancillary Facilities and Associated Filling of Land for a Period of Three
Years in the "AGR" zone in Tai Kong Po in KamTin (A/YL-KTN/1244)**

We would like to show concern to the captioned.

Suspected unlawful development within the application site

Compared with Google aerial imagery between 2018 and 2026, the Application Site was vegetated in January 2018, but appears to have been converted to open storage use by December of the same year, or earlier. By 2024, extensive site formation works were observed. Such land use and associated concretisation are unlikely to be consistent with the "AGR" zoning. While up-to-date information on the current site condition is not available, and it is unclear whether any unauthorised change of use has occurred, we respectfully request that the Town Planning Board invite the relevant government departments to investigate any potential illegal land use or development associated with the Application Site. Should any irregularities be confirmed, the Board is urged to reject the application to avoid legitimising unlawful uses prior to the granting of planning permission.

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

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、大紫荊勳賢, SBS, PDSM
主席：白丹尼先生
行政總裁：黃碧霞女士

核數師：富睿瑪華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)

Figure 1. Aerial views of Application Site in 2018, 2024 and 2026 which show that the site has likely been using as open storage since 2018 and with massive formation to concretised the site in 2024



Image source: Google Earth for the 2018 and 2024 images and Google Street Map for 2026 image (Accessed on 17 June 2026)

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

260702-134411-11733

Reference Number:

提交限期

07/07/2026

Deadline for submission:

提交日期及時間

02/07/2026 13:44:11

Date and time of submission:

有關的規劃申請編號

A/YL-KTN/1244

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Jack Wong

Name of person making this comment:

意見詳情

Details of the Comment :

致城市規劃委員會：

我是錦田長江村村民。驚悉城市規劃委員會正審理上述關於元朗錦田北丈量約份第109約多個地段（包括地段第1354號、第1356號、第1373號、第1374號及第1375號各部分）的臨時貨倉及填土規劃申請。對此，本人及全體受影響居民表示極度震驚及強烈反對。

該申請選址現為「農業」地帶，若批准改作臨時貨倉並容許大規模填土，將對周邊村民的日常生活、交通安全及生命財產造成不可逆轉的嚴重破壞。以下為我們的強烈反對理由：

一、扼殺村民唯一進出通道，引發災難性交通癱瘓與安全隱患

申請人雖聲稱出入該地點主要使用江埔路轉郊區小徑，但事實上，該段道路是附近眾多村民進出居住環境的唯一主要通道。道路狹窄，根本無法承受貨櫃車出入：

該郊區小徑極為狹窄，申請計畫中卻包含高達9個輕型貨車上落貨位。實際運作時，大型車輛的體積將完全堵塞這條「唯一通道」。

每日高達208架次車流，造成嚴重擠塞：根據申請人提交的預計車流量表，每日進出車流總和高達204至208架次（入104架次、出104架次），且高度集中在日間村民上班、上學及暢行之高峰期。大批貨車在狹小的通道上調遣、等候或倒車，必然將村民的唯一生路完全癱瘓。

人車爭路，威脅長者與學童生命安全：該通道日常有大量村民、老人及學童步行。一旦大量重型車輛強行進出，極易釀成嚴重交通傷亡慘劇。

二、大規模混凝土填土破壞自然排洪，恐引發毀滅性水浸

申請文件承認該處已進行了高達4,577.1平方米（佔地盤面積96.7%）的混凝土填土工程，填土厚度達0.3至0.4米。這項工程對周邊環境形成巨大的水浸威脅：

徹底喪失土地吸水功能：原本的「農業」綠地具有極佳的天然儲水和滲水排洪功能。如今幾近全片土地被混凝土封死，當遇上暴雨或颱風時，雨水無法滲入地下，將在地表形成巨大洪流。

周邊村落將成「澤國」：雖然申請選址東面有現成渠道，但其排洪能力根本無法負荷被混凝土化後的大型暴雨徑流。雨水必將湧向地勢較低的村屋及周邊農地，直接威脅村民的生命財產安全。

三、嚴重破壞環境與村民日常生活，與「農業」規劃意向背道而馳

徹底摧毀鄉郊寧靜：擬議貨倉營運時間為周一至周六上午9時至下午7時。長達10小時的機械操作、車輛引擎聲、搬運噪音及排出的廢氣，將使鄰近居民與村落永無寧日，嚴重剝奪村民享有安居環境的權利。

反對「先破壞、後申請」的惡劣風氣：申請地點在未獲規劃許可前，便已完成了大面積的平整及填土工程。若城規會網開一面批准此申請，等同變相鼓勵發展商「先破壞，後申請」，摧毀城規制度的公信力。

此項規劃申請（A/YL-KTN/1244）不單與大規劃環境的「農業」發展意向完全背離，更是將商業利益建立在犧牲村民生命安全、交通權利及居住環境的痛苦之上。村民絕不接受唯一的主要通道被大型車輛霸佔，更絕不接受填土帶來的常態性水浸恐慌。

基於上述維護村民基本生存與安居權利的強烈理由，本人懇請城市規劃委員會各委員秉持公正，體恤民情，堅決拒絕這項規劃申請。

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年07月02日星期四 16:01
收件者: tpbpd/PLAND
主旨: 強烈反對規劃申請編號 A/YL-KTN/1244 — 擬議臨時貨倉（危險品倉庫除外）連附屬設施和相關填土工程（為期3年）
類別: Internet Email

致城市規劃委員會：

我是錦田長江村村民。驚悉城市規劃委員會正審理上述關於元朗錦田北丈量約份第 109 約多個地段（包括地段第 1354 號、第 1356 號、第 1373 號、第 1374 號及第 1375 號各部分）的臨時貨倉及填土規劃申請。對此，本人及全體受影響居民表示極度震驚及強烈反對。

該申請選址現為「農業」地帶，若批准改作臨時貨倉並容許大規模填土，將對周邊村民的日常生活、交通安全及生命財產造成不可逆轉的嚴重破壞。以下為我們的強烈反對理由：

一、扼殺村民唯一進出通道，引發災難性交通癱瘓與安全隱患

申請人雖聲稱出入該地點主要使用江埔路轉郊區小徑，但事實上，該段道路是附近眾多村民進出居住環境的唯一主要通道。道路狹窄，根本無法承受貨櫃車出入：

該郊區小徑極為狹窄，申請計畫中卻包含高達 9 個輕型貨車上落貨位。實際運作時，大型車輛的體積將完全堵塞這條「唯一通道」。

每日高達 208 架次車流，造成嚴重擠塞：根據申請人提交的預計車流量表，每日進出車流總和高達 204 至 208 架次（入 104 架次、出 104 架次），且高度集中在日間村民上班、上學及暢行之高峰期。大批貨車在狹小的通道上調遣、等候或倒車，必然將村民的唯一生路完全癱瘓。

人車爭路，威脅長者與學童生命安全：該通道日常有大量村民、老人及學童步行。一旦大量重型車輛強行進出，極易釀成嚴重交通傷亡慘劇。

二、大規模混凝土填土破壞自然排洪，恐引發毀滅性水浸

申請文件承認該處已進行了高達 4,577.1 平方米（佔地盤面積 96.7%）的混凝土填土工程，填土厚度達 0.3 至 0.4 米。這項工程對周邊環境形成巨大的水浸威脅：

徹底喪失土地吸水功能：原本的「農業」綠地具有極佳的天然儲水和滲水排洪功能。如今幾近全片土地被混凝土封死，當遇上暴雨或颱風時，雨水無法滲入地下，將在地表形成巨大洪流。

周邊村落將成「澤國」：雖然申請選址東面有現成渠道，但其排洪能力根本無法負荷被混凝土化後的大型暴雨徑流。雨水必將湧向地勢較低的村屋及周邊農地，直接威脅村民的生命財產安全。

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三、嚴重破壞環境與村民日常生活，與「農業」規劃意向背道而馳

徹底摧毀鄉郊寧靜：擬議貨倉營運時間為周一至周六上午 9 時至下午 7 時。長達 10 小時的機械操作、車輛引擎聲、搬運噪音及排出的廢氣，將使鄰近居民與村落永無寧日，嚴重剝奪村民享有安居環境的權利。

反對「先破壞、後申請」的惡劣風氣：申請地點在未獲規劃許可前，便已完成了大面積的平整及填土工程。若城規會網開一面批准此申請，等同變相鼓勵發展商「先破壞，後申請」，摧毀城規制度的公信力。

此項規劃申請（A/YL-KTN/1244）不單與大規劃環境的「農業」發展意向完全背離，更是將商業利益建立在犧牲村民生命安全、交通權利及居住環境的痛苦之上。村民絕不接受唯一的主要通道被大型車輛霸佔，更絕不接受填土帶來的常態性水浸恐慌。

基於上述維護村民基本生存與安居權利的強烈理由，本人懇請城市規劃委員會各委員秉持公正，體恤民情，堅決拒絕這項規劃申請。

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tpbpd/PLAND

寄件者: [REDACTED]
 寄件日期: 2026年07月07日星期二 0:46
 收件者: tpbpd/PLAND
 主旨: A/YL-KTN/1244 DD 109, Cheung Kong Tsuen, Kam Tin
 類別: Internet Email

Dear TPB Members,

1157 withdrawn. Previous objections relevant and upheld.

The application should be rejected.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Sunday, 7 September 2025 11:16 PM HKT
Subject: A/YL-KTN/1157 DD 109, Cheung Kong Tsuen, Kam Tin

A/YL-KTN/1157

Lots 1354 (Part), 1356 (Part), 1373 (Part), 1374 (Part) and 1375 (Part) in D.D. 109, Cheung Kong Tsuen, Kam Tin

Site area: About 4,735sq.m

Zoning: "Agriculture"

Applied use: Warehouse / 11 Vehicle Parking / **Filling of Land Entire Site**

Dear TPB Members,

The site is an amalgamation of 3 previous applications

940 – Approved 25 Aug 2023 Revoked 25 Feb 2025

928 and 925 – Approved 11 Aug 2023. Both revoked 11 Feb 2025

Fire and Drainage conditions for all three at issue

Solution. Team up and put make a new application.

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The application site has been filled and levelled in accordance with A/YL-KTN/925, A/YL-KTN/928 and A/YL-KTN/940.

NOTE - The **proposed drainage plan and environmental mitigation measures** will also benefit the surrounding areas, effectively enhancing environmental protection in the area and surrounding areas and reducing the risk of flooding.

So once again lots of promises but no concrete evidence of implementation.

In view of the recent heavy rains and flooding and the predictions that going forward conditions will gradually deteriorate; it is quite shocking that plans like this are fast tracked even though the lots are not Cat 2 and there is no evidence of relocation due to land resumption.

While PlanD is subject to pressure from Dev Bureau to facilitate the transformation of the entire NT to brownfield, members are supposed to be independent and question the justification for plans like this.

The application should be rejected.

Who will take responsibility when this application is revoked in two years time?

Mary Mulvihill

From: [REDACTED]

To: tpbpd <tpbpd@pland.gov.hk>

Date: Thursday, 3 August 2023 3:27 AM HKT

Subject: A/YL-KTN/940 DD 109, Cheung Kong Tsuen, Kam Tin

A/YL-KTN/940

Lots 1354 (Part), 1356 (Part), 1373 (Part) and 1374 (Part) in D.D. 109, Cheung Kong Tsuen, Kam Tin

Site area : About 2,438sq.m

Zoning: "Agriculture"

Applied use: Warehouse / 6 Vehicle Parking / **Filling of Land Entire Site**

Dear TPB Members,

Strong Objections, there is no previous history of applications. The applicant proposes to fill in the entire site. There is extensive farming activity in the area. Members should check aerial images to see if there has been recent trashing of the site.

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Application 746 for hobby farm on adjoining lots has not fulfilled conditions. This indicates that there are intentions to gradually fill in and convert the lots to brownfield.

In view of the amount of farmland that is to be developed into housing, there is no justification to approval for the transformation of what is left to be gradually transformed into the brownfield sprawl that we were promised would be eradicated. Warehouses should be accommodated on purpose built industrial estates. Operators should be obliged to unite and invest in well designed and equipped compounds.

While approval of brownfield is an easy solution, members have a duty to protect arable farmland in order to ensure a minimal level of local food production.

Mary Mulvihill

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

260706-180143-10284

Reference Number:**提交限期**

07/07/2026

Deadline for submission:**提交日期及時間**

06/07/2026 18:01:43

Date and time of submission:**有關的規劃申請編號**

A/YL-KTN/1244

The application no. to which the comment relates:**「提意見人」姓名/名稱**

女士 Ms. Lam

Name of person making this comment:**意見詳情****Details of the Comment :**

本人就上述申請（新界元朗錦田丈量約份第109約地段第1354號(部分)、1356號(部分)、1373號(部分)、1374號(部分)及1375號(部分)擬議臨時貨倉用途）表達強烈反對，並要求城市規劃委員會及相關部門從防洪及水文管理的角度嚴格審視此項目，尤其是申請地點與現有排水渠道的緊密關係。

再者，農地具備天然吸水及緩衝雨水的功能。本申請擬建8座構築物，加上大面積露天空間用作車輛停泊、上落貨及迴旋用途，意味著地盤內大部分土地將需鋪設硬地或壓實地面以承載重型車輛及貨物存放。此舉必然大幅降低原有農地的透水率，令雨水難以自然滲透，表面徑流量將顯著增加，直接加重鄰近渠道及區內排水系統的負荷。

在近年極端降雨事件日益頻密的背景下，任何令天然滲水土地硬化的發展，均應被視為對區域防洪能力的潛在威脅。一旦渠道在暴雨期間不勝負荷，鄰近居民及農地的生命財產安全將直接受到威脅。

本人懇請城市規劃委員會以防洪安全為首要考量，要求申請人提供獨立的排水影響評估及具體緩解措施，並在相關疑慮未獲圓滿解答前，否決此項申請。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 260706-180659-99436

提交限期
Deadline for submission: 07/07/2026

提交日期及時間
Date and time of submission: 06/07/2026 18:06:59

有關的規劃申請編號
The application no. to which the comment relates: A/YL-KTN/1244

「提意見人」姓名/名稱
Name of person making this comment: 女士 Ms. Amanda

意見詳情 **Details of the Comment :**

本人作為關注社區發展的市民，就江埔路農地改建臨時貨倉的規劃申請表達強烈反對，理由是該選址與周邊居民生活環境存在嚴重衝突。

城規會《TPB PG-No. 13G》第5(a)(i)段明確指出，具頻密重型車輛交通及可能造成噪音、空氣污染滋擾的露天貯物/後勤用途，不應設於鄰近住宅樓宇、學校等易受影響地點。本申請雖以「臨時貨倉」為名，但根據申請書所述，場內存放車輛、金屬、機器及建築材料，並設有9個輕型貨車上落貨位，其性質與指引所指的滋擾性用途高度重疊。城規會審批時應按此準則評估申請與周邊住宅的相容性，而非視之為一般貯物用途放行。

申請文件顯示，江埔路僅約6米闊，屬雙線雙程道路。即使申請聲稱每小時出入僅0至10架次，貨車體積龐大，會車及調度空間仍屬有限，一旦與其他道路使用者對頭相遇，安全風險不容忽視。

更需指出，申請書所列車流數字只是申請人自行申報的預測，並無約束力，亦無任何監管機制確保日後實際營運維持在此水平。一旦貨倉規模擴大或轉手經營，車流隨時大幅上升，居民將被迫承受遠超申請時所述的噪音、廢氣及交通壓力，而屆時已無從追究。長期處於此環境下，居民（尤其長者及學童）的身心健康將受損。基於保障居住環境及公眾安全，我們堅決要求當局否決此案。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

260706-180958-82435

Reference Number:

提交限期

07/07/2026

Deadline for submission:

提交日期及時間

06/07/2026 18:09:58

Date and time of submission:

有關的規劃申請編號

A/YL-KTN/1244

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Ho

Name of person making this comment:

意見詳情

Details of the Comment :

針對江埔路地段改作臨時貨倉之申請，本人現致函表達強烈反對，並對「農業」地帶持續被蠶食一事表示高度關注。

申請人在文件中承認，同一地段早已根據A/YL-KTN/925、928及940三宗申請完成填土及平整。換言之，這幅本應屬農業用途的土地，實質上已經歷多次「臨時」改劃，一步步由農地變成貯物用地。本次申請只是同一模式的延續——以「臨時」之名，達致永久棕地化之實。

當局若一再以個別申請「情況相類」為由批准，等同縱容整個地帶透過分批申請的方式規避規劃管制，令原意保護農業用途的地帶名存實亡。填土及硬化工程亦已在過程中造成表土流失、地力破壞，即使日後申請期滿，土地亦難以復耕。

我們促請當局正視這種「以臨時申請蠶食農地」的規劃漏洞，拒絕本次申請，並要求對同一地帶過往已批項目進行整體規劃檢討，以真正守護香港僅餘的鄉郊綠土。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

260706-181441-20343

Reference Number:**提交限期**

07/07/2026

Deadline for submission:**提交日期及時間**

06/07/2026 18:14:41

Date and time of submission:**有關的規劃申請編號**

A/YL-KTN/1244

The application no. to which the comment relates:**「提意見人」姓名/名稱**

先生 Mr. Chow

Name of person making this comment:**意見詳情****Details of the Comment :**

本人對江埔路地段擬議臨時貨倉申請的規劃程序表達強烈關注，尤其質疑「先完成既定事實，後申請規劃許可」的模式是否正被濫用。

申請文件顯示，涉事地段的填土及平整工程，是依據A/YL-KTN/925、928及940三宗較早申請完成的。換言之，土地早已在本次申請提交前被實質改造。這種「以往批准的臨時工程，逐步鋪墊成下一次申請的既有現狀」的操作模式，令城規會每次審批時面對的已不是原生農地，而是一片早已被平整、鋪設圍板的既成用地，實際上大大削弱了城規會拒絕申請的空間。

若當局對這種透過連續申請、逐步固化土地用途的手法不加正視，日後任何農業地帶都可以透過同一手法，一步步蠶食成永久性的貯物用地，規劃管制將形同虛設。

我們要求城規會嚴格審視本次申請與過往三宗批准之間的關聯性，並考慮本次批准是否會進一步鞏固既定事實、削弱未來規劃管制的執行力，而非孤立地看待這一宗申請。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

260706-182106-11724

Reference Number:**提交限期**

07/07/2026

Deadline for submission:**提交日期及時間**

06/07/2026 18:21:06

Date and time of submission:**有關的規劃申請編號**

A/YL-KTN/1244

The application no. to which the comment relates:**「提意見人」姓名/名稱**

小姐 Miss Chiu

Name of person making this comment:**意見詳情****Details of the Comment :**

本人就江埔路地段由農地發展為臨時貨倉之規劃申請表達強烈反對。表面上，申請人只求「臨時」三年許可，但填土及平整工程早已根據A/YL-KTN/925、928及940三宗申請完成——即這片土地的農業性質，已透過連續的「臨時」申請被永久改變。土壤結構一旦被破壞，並不會因為許可屆滿而自動復原。若每次申請都以「臨時」之名迴避永久性土地用途改變的嚴格審批，農業地帶將在「合法」的框架下被逐步蠶食至無法復耕。我們要求城規會正視這種以臨時申請累積永久破壞的規劃漏洞，拒絕本次申請。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

260706-182404-75497

提交限期

Deadline for submission:

07/07/2026

提交日期及時間

Date and time of submission:

06/07/2026 18:24:04

有關的規劃申請編號

The application no. to which the comment relates:

A/YL-KTN/1244

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Tam

意見詳情

Details of the Comment :

本人就江埔路地段擬議臨時貨倉申請表達反對。

申請人在文件中以「土地資源稀少」為由，指出洪水橋/廈村新發展區及模範鄉至逢吉鄉一帶已有農業及工業用地被改劃為住宅或政府/機構/社區用途，藉此論證本申請合理。然而，這個論點正是反對本申請的理由：正因為區內農業用地已持續被蠶食，餘下的農業地帶更應被嚴格保護，而非成為另一塊被犧牲的土地。

若城規會接受「因為其他地方已經流失農地，所以這裡也可以流失」的邏輯，農業地帶將在這種累積效應下永無寧日。我們要求城規會拒絕本申請，並將區內農地流失的整體趨勢納入考量，而非逐宗申請孤立審批。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

260706-182920-19409

Reference Number:

提交限期

07/07/2026

Deadline for submission:

提交日期及時間

06/07/2026 18:29:20

Date and time of submission:

有關的規劃申請編號

A/YL-KTN/1244

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Isabelle

Name of person making this comment:

意見詳情

Details of the Comment :

本人作為江埔路一帶居民，要求城規會及渠務署一併審視本申請對區域排水系統的累積影響。

申請人透露，同一地帶已有A/YL-KTN/925、928及940三宗性質相同的貨倉申請獲批，且全部緊鄰同一渠道範圍。目前的申請回應僅承諾「本申請範圍不會填土、會保留渠道現狀」，但這只是逐宗申請的個別承諾，並無任何文件顯示渠務署曾對四宗申請的疊加效應（即同一渠道兩岸土地陸續硬底化）作出整體評估。

單一渠道的排洪能力是有限的，若兩岸農地因連續獲批的貨倉申請而逐步硬化，即使每宗申請個別看來影響輕微，累積起來足以令渠道在暴雨下超出負荷。我們要求城規會在批核前，要求申請人或渠務署提供涵蓋925、928、940及本申請共四個地段的整體排水影響評估，而非接受個別、片段式的保證。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

260706-183255-48537

Reference Number:

提交限期

07/07/2026

Deadline for submission:

提交日期及時間

06/07/2026 18:32:55

Date and time of submission:

有關的規劃申請編號

A/YL-KTN/1244

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Lee

Name of person making this comment:

意見詳情

Details of the Comment :

本人作為江埔路沿線居民及學童家長，關注申請書中的車位安排與實際運作需求不符，恐日後衍生違泊及路面阻塞問題。

申請文件顯示，本項目地盤面積達4,735平方米，設有8座構築物、非住用樓面面積1,792平方米，但整個地盤只規劃2個私家車車位及9個輕型貨車上落貨位。以此規模的貨倉營運，員工、訪客及頻繁進出的貨車司機所需的臨時停放空間，明顯遠超申請書所列數字。

申請人聲稱地盤內設有直徑12米及8米的迴旋空間，車輛「不需在公用道路上等候」，但這是基於申請書所述的理想營運狀況。一旦實際車流超出預測，或有車輛需等候上落貨，江埔路作為僅6米闊的雙線雙程道路，將難以承受路旁臨時停放車輛，直接影響學童及居民的步行安全。我們要求城規會要求申請人提供更貼近實際營運規模的車位配套方案，而非僅以理論上的迴旋空間作為安全保證。