

**Extract of Town Planning Board Guidelines for
Application for Development within Green Belt Zone
under Section 16 of the Town Planning Ordinance
(TPB PG-No. 10)**

The relevant assessment criteria are as follows:

- (a) There is a general presumption against development (other than redevelopment) in a “Green Belt” (“GB”) zone. In general the Board will only be prepared to approve applications for development in the context of requests to rezone to an appropriate use.
- (b) An application for new development in a “GB” zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be compatible with the character of surrounding areas. With the exception of New Territories Exempted Houses, a plot ratio up to 0.4 for residential development may be permitted.
- (c) Applications for New Territories Exempted Houses with satisfactory sewage disposal facilities and access arrangements may be approved if the application sites are in close proximity to existing villages and in keeping with the surrounding uses, and where the development is to meet the demand from indigenous villagers.
- (d) Redevelopment of existing residential development will generally be permitted up to the intensity of the existing development.
- (e) Applications for government/institution/community (G/IC) uses and public utility installations must demonstrate that the proposed development is essential and that no alternative sites are available. The plot ratio of the development site may exceed 0.4 so as to minimize the land to be allocated for G/IC uses.
- (f) Passive recreational uses which are compatible with the character of surrounding areas may be given sympathetic consideration.
- (g) The design and layout of any proposed development should be compatible with the surrounding area. The development should not involve extensive clearance

of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact on the surrounding environment.

- (h) The vehicular access road and parking provision proposed should be appropriate to the scale of the development and comply with relevant standards. Access and parking should not adversely affect existing trees or other natural landscape features. Tree preservation and landscaping proposals should be provided.
- (i) The proposed development should not overstrain the capacity of existing and planned infrastructure such as sewerage, roads and water supply. It should not adversely affect drainage or aggravate flooding in the area.
- (j) The proposed development must comply with the development controls and restrictions of areas designated as water gathering grounds.
- (k) The proposed development should not overstrain the overall provision of G/IC facilities in the general area.
- (l) The proposed development should not be susceptible to adverse environmental effects from pollution sources nearby such as traffic noise, unless adequate mitigating measures are provided, and it should not itself be the source of pollution.
- (m) Any proposed development on a slope or hillside should not adversely affect slope stability.

Previous s.16 Application covering the Application Site

Rejected Application

	<u>Application No.</u>	<u>Proposed Use</u>	<u>Zoning</u>	<u>Date of Consideration</u>	<u>Rejection Reasons</u>
1	A/YL-LFS/411	Temporary Warehouse for Storage of Construction Materials for a Period of Three Years and Filling of Land	GB	2.9.2022 (Review by TPB)	(1) to (3)
				3.5.2024 (Appeal dismissed by the Appeal Board Panel (Town Planning))	(4)

Rejection Reasons

1. No strong planning justification for a departure from the planning intention.
2. Not in line with the TPB PG-No. 10 in that the filling and excavation of land is considered not compatible with the surrounding areas, and the applicant fails to demonstrate that the applied development would not have significant adverse environmental and landscape impacts on the surrounding areas.
3. Setting an undesirable precedent.
4. The Appellants' justifications to the appeal (on aspects including claiming "existing use", insignificant landscape and ecological value, no adverse comment from government departments, minimal environmental impact on the surrounding area, not incompatible with the surrounding area, etc.) were all rejected by the Appeal Board (Town Planning).

Government Departments' General Comments

1. Land Administration

Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD):

- (a) He has no adverse comment on the application.
- (b) The applicant should note his advisory comments at **Appendix V**.

2. Traffic

- (i) Comments of the Commissioner for Transport (C for T):

She has no adverse comment on the application from traffic engineering perspective.

- (ii) Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD):

- (a) He has no objection on the application from highway maintenance perspective.
- (b) The run-in/out from Deep Bay Road should be constructed and maintained by the applicant. The run-in/out should be removed and the road should be reinstated to the satisfaction of HyD.
- (c) The applicant should note his advisory comments at **Appendix V**.

3. Environment

Comments of the Director of Environmental Protection (DEP):

- (a) Having reviewed the applicant's Further Information submission, he noted that the applicant only applied for two private car parking spaces and one parking space for a 19-seater minibus which is considered as the light bus, the applied use would not involve traffic of heavy vehicle or dusty operation though there is a 3-storey village house located ~70m from the proposed development. The applicant also committed that (i) no public announcement systems, whistles, loudspeakers, or audio amplification will be used, (ii) the training centre will be closed at night-time from 23:00-07:00 and no training will be conducted, (iii) the water tower will be positioned inside the proposed structure and will be installed with soundproofing materials and (iv) no ventilation system or openable windows will be installed at southern wall of the proposed structure and no direct line-of-sight of the indoor training ground to the nearby noise sensitive receiver (i.e. 3-storey village house).
- (b) On the above basis, according to the latest "Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites", he has no objection to the application from environmental planning perspective.
- (c) There was no substantiated environmental complaint pertaining to the application site

(the Site) in the past three years.

- (d) The applicant should note his advisory comments at **Appendix V**.

4. **Landscaping**

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

- (a) According to the aerial photo taken in 2025, the Site is situated in an area of rural coastal plain landscape characterised by temporary structures, graves and tree clusters.
- (b) With reference to the site photos taken in 2026, the southern portion of the Site is formed and existing trees are observed at the northern portion of the Site.
- (c) The Site is zoned “Green Belt” on the OZP and the proposed use would alter the landscape character of the area. Nevertheless, according to the submitted Landscape Proposal (**Drawing A-4**), the existing tree groups at the northern portion of the Site will be preserved. In addition, the applicant has also proposed a vertical green wall (approximately 15m² in area) and 10 to 15 trees planted in pots in the southern portion of the Site as landscape mitigation measures.
- (d) In view of the above, she has no adverse comment from landscape planning perspective since no significant adverse landscape impact arising from the proposed use is anticipated.
- (e) Should the Town Planning Board (TPB) decide to approve the application, the following approval conditions are advised for incorporation:
 - (i) the submission of a revised Landscape Proposal within 6 months from the date of planning approval to the satisfaction of the Director of Planning or of the TPB; and
 - (ii) implementation of a revised Landscape Proposal within 9 months from the date of planning approval to the satisfaction of the Director of Planning or of the TPB.

5. **Drainage**

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

- (a) He has no objection in principle to the application from the public drainage point of view.
- (b) For any change of existing ground level and associated works proposed by the applicant that could affect adjacent land and cause other impacts and/or other issues to public, the applicant should be required to submit technical assessment(s) in other aspect(s) and seek comment from relevant departments as necessary.

- (c) Should the TPB consider that the application is acceptable from planning point of view, approval conditions should be stipulated requiring the applicant to submit a drainage proposal including the design of proposed storage tank, to implement and maintain the proposed drainage facilities to his satisfaction.

6. Fire Safety

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

- (a) He has no objection in principle to the proposal subject to fire service installations being provided to his satisfaction.
- (b) The applicant should note his advisory comments at **Appendix V**.

7. Project Interface

Comments of the Project Manager (West), Civil Engineering and Development Department (PM(W), CEDD):

- (a) The application site falls within the study area of Lau Fau Shan Development under the consultancy Agreement No. CE 5/2024 (CE) “Developments at Lau Fau Shan, Tsim Bei Tsui and Pak Nai Areas - Investigation”, which is the Investigation Study and jointly commissioned by the Planning Department and CEDD. The implementation and land resumption/clearance programme of the Lau Fau Shan Development is currently being reviewed under the Investigation Study and subject to change.
- (b) If the planning permission is granted, notwithstanding its validity period, the applicant should note his advisory comments detailed in **Appendix V**.

8. Building Matters

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

Noting that the proposed temporary baseball training centre is carried out on Government Land, he is not in a position to comment under the Buildings Ordinance on the application.

9. Other Departments' Comments

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

- (a) Director of Agriculture, Fisheries and Conservation (DAFC);
- (b) Director of Leisure and Cultural Services (DLCS);
- (c) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (d) Head of Geotechnical Engineering Office, CEDD (H(GEO), CEDD);
- (e) Chief Engineer/Land Works (CE/LW), CEDD;
- (f) Director of Food and Environmental Hygiene (DFEH); and

(g) Commissioner of Police (C of P).

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 note the comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD) that:
 - (i) according to his desktop checking, the Site comprises Government land (GL) having an area of about 1,920m², of which actual site area and boundary of the GL involved will be subject to verification upon the processing of Short Term Tenancy (STT) application;
 - (ii) noting that the access to the Site from Deep Bay Road passes through unleased and unallocated GL (“the said GL”), there is no guarantee that the said GL would be granted or to be used for access road connecting the Site with Deep Bay Road. Without vehicular access to the Site, the STT, if applied, may not be granted. The applicant shall consider if the said GL shall be included into the Site;
 - (iii) after reviewing the applicant’s further information which commits to maintain and open up part of the Site serving as access road to other private lots in the vicinity, he advises that LandsD will at its sole discretion determine the site boundary and impose such terms and conditions in the STT; and
 - (iv) the applicant is reminded that necessary policy support from the bureau/department concerned for a STT application would be required to implement the proposal. Upon receipt of the STT application with policy support being given by the bureau/department concerned, LandsD will consider the application in accordance with applicable policy and practice and there is no guarantee that the said application will be approved. The said application if approved would be subject to such terms and conditions, to be imposed by LandsD in the landlord capacity at its sole discretion;
- (c) to note the comments of the Director of Environmental Protection (DEP) that the applicant is advised:
 - (i) no public announcement system, portable loudspeaker or any form of audio amplification system and whistle blowing is allowed at the subject Site as proposed during the planning approval period;
 - (ii) no operation or training activities are allowed at night-time from 23:00-07:00;
 - (iii) the water tower shall be positioned inside the proposed structure and installed with soundproofing materials as proposed;
 - (iv) no ventilation system or openable windows are allowed for installation at the southern wall of the proposed structure and no direct line-of-sight of the indoor training ground to the nearby noise sensitive receiver;

- (v) no medium/heavy goods vehicles exceeding 5.5 tonnes are allowed to enter/exit or to parked/stored on the Site at any time during the planning approval period;
 - (vi) to follow the latest “Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites”;
 - (vii) to follow the relevant guidelines and requirements in relevant Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs). If septic tank and soakaway system will be used in case of unavailability of public sewer, its design and construction shall follow the requirements of ProPECC PN 1/23 “Drainage Plans subject to Comment by the Environmental Protection Department” including completion of percolation test and certification by Authorized Person;
 - (viii) to provide adequate supporting infrastructure/facilities for proper collection, treatment and disposal of waste/wastewater generated from the proposed use; and
 - (ix) to meet the statutory requirements under relevant environmental legislation;
- (d) to note the comments of the Commissioner for Transport (C for T) that:
- (i) sufficient manoeuvring spaces shall be provided within the Site or its adjacent area. No vehicles are allowed to queue back to public roads or reverse onto/from public roads; and
 - (ii) the local track leading to the Site is not under the Transport Department’s purview. The applicant shall obtain consent of the owners/managing departments of the local track for using it as the vehicular access to the Site;
- (e) to note the comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD) that adequate drainage measures shall be provided to prevent surface water running from the Site to the nearby public roads and drains. The run-in/out from Deep Bay Road should be constructed and maintained by the applicant. The run-in/out should be removed and the road should be reinstated to the satisfaction of HyD;
- (f) to note the comments of the Director of Fire Services (D of FS) that in consideration of the design/nature of the proposal, fire service installations (FSIs) are anticipated to be required. The applicant shall submit relevant layout plans incorporated with the proposed FSIs to the Fire Services Department for approval. The layout plans should be drawn to scale and depicted with dimensions and nature of occupancy. The location of where the proposed FSIs to be installed should be clearly marked on the layout plans. If the proposed structure(s) is required to comply with the Buildings Ordinance (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans;
- (g) to note the comments of the Commissioner of Police that comprehensive traffic assessment shall be required to ensure the planning aligns with traffic patterns and public transport integration including analysis of potential impacts on local public transport networks regarding the great number of potential visitors;

- (h) to note the comments of the Director of Food and Environmental Hygiene (DFEH) that:
- (i) no Food and Environmental Hygiene Department's (FEHD) facilities should be affected;
 - (ii) proper licence / permit issued by this Department is required if there is any food business / catering service / activities regulated by the Director of Food and Environmental Hygiene (DFEH) under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public. Under the Food Business Regulation, Cap. 132X, a food business licence is required for the operation of the relevant type of food business listed in the Regulation (e.g. a restaurant, a food factory etc.). The application for licence, if acceptable by the FEHD, will be referred to relevant government departments such as the Buildings Department, Fire Services Department and Planning Department for comment. If there is no objection from the departments concerned, a letter of requirements will be issued to the applicant for compliance and the licence will be issued upon compliance of all the requirements;
 - (iii) pursuant to section 4 of the Food Business Regulation (Cap. 132X) (FBR), the expression of "food business" does not include any club. As such, a club is exempted from obtaining food business licence from his department except for permission to sell restricted foods specified in Schedule 2 to the Food Business Regulation; and
 - (iv) proper licence issued by FEHD is required if related place of entertainment is involved. Any person who desires to keep or use any place of public entertainment for example a theatre and cinema or a place, building, erection or structure, whether temporary or permanent, on one occasion or more, capable of accommodating the public presenting or carrying on public entertainment within Places of Public Entertainment (PPE) Ordinance (Cap. 172) and its subsidiary legislation, such as a concert, opera, ballet, stage performance or other musical, dramatic or theatrical entertainment, cinematograph or laser projection display, a circus, a lecture or story-telling, an exhibition of any one or more of the following, namely, pictures, photographs, books, manuscripts or other documents or other things, a sporting exhibition or contest, a bazaar, a dance party or an amusement ride and mechanical device which is designed for amusement, a Place of Public Entertainment Licence (or Temporary Place of Public Entertainment Licence) should be obtained from FEHD whatever the general public is admitted with or without payment. There should be no encroachment on the public place and no environmental nuisance should be generated to the surroundings. Its state should not be a nuisance or injurious or dangerous to health and surrounding environment. Also, for any waste generated from such activities/operation, the applicant should arrange disposal properly at their own expenses; and
- (i) to note the comments of the Project Manager (West), Civil Engineering and Development Department (PM(W), CEDD) that the Site falls within the study area of Lau Fau Shan Development under the consultancy Agreement No. CE 5/2024 (CE) "Developments at Lau Fau Shan, Tsim Bei Tsui and Pak Nai Areas - Investigation", which is the Investigation Study and jointly commissioned by the Planning Department and CEDD. The implementation and land resumption/clearance programme of the Lau Fau Shan Development is currently being reviewed under the Investigation Study and subject to change. The applicant should be reminded that the Site may be resumed at any time during the planning approval period for potential development project and

advised not to carry out any substantial works therein.

呈：元朗民政事務處
民政事務專員台鑑！

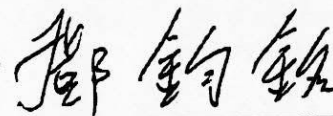
項接有關貴處檔號：(3) in 017-2811-045-040-014-0046-P001

有關人仕在元朗流浮山輞井區丈量約份第129約的政府土地擬議申請臨時棒球訓練中（為期3年）（申請編號：A/YL-LFS/604）

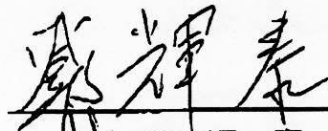
我等村代表反對在該處申領官地辦臨時棒球訓練中心，反對理由如下：

- （一）該地段是政府土地及綠化地帶，不適宜辦運動，
- （二）深灣路是單程雙向行車線，除非政府擴闊為標準雙程路及附有單車路徑，
- （三）擬議發展該運動不適合，皆因側兩面都是殯葬區，現在有眾多墓地及金塔存在，恐怕影響先人的安寧，對先人不敬！
- （四）村民在該區地帶申請露天倉等用途也被政府有關部門拒絕批准！
- （五）該擬議申請未有一個完善計劃，人流及車輛使用率冇數據分析！
- （六）總結以上因素！現有單程道路不勝負荷！恐怕人車爭路，造成人命傷亡！
- （七）該現有深灣道路建設迄今已超過六十年，政府未曾改善過。時代不段在變，極盼望政府有關要員深思，把該道路擴闊為雙程路！配合時代的進步，造福市民。特此函達！惟盼！

輞井圍村代表簽署：



（鄧鈞銘）



（鄧輝泰）



（鄧南盛）

2026 年 04 月 06 日

→ GRC

(5)

14/46

致：城規會

提交反對 A/YL-LFS/604 的意見

本人張錦超是屏山鄉輞井村原居民代表，現提出反對意見如下：

- 1)申請地點的道路只有一條單線車道連接至流浮山迴旋處，在繁忙時間經常因對頭車而導致擠塞。
- 2)申請地點為綠化地帶，極之接近自然保護區，此申請與週邊的靜態環境顯得格格不入。
- 3)在尖鼻咀至輞井村一帶經常有行山人士遠足，此申請將會增加危險性。

如有任何問題可致電本人：

謝謝！

屏山鄉輞井村原居民代表：

張錦超

2026 年 4 月 2 日

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

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年04月04日星期六 2:22
收件者: tpbpd/PLAND
主旨: A/YL-LFS/604 DD 129, Lau Fau Shan GB Yuen Long Baseball Club
類別: Internet Email

A/YL-LFS/604 Yuen Long Baseball Club

Government Land in D.D. 129, Lau Fau Shan

Site area: 1,920sq.m

Zoning: "Green Belt"

Applied use: Baseball Training Centre / 3 Vehicle Parking

Dear TPB Members,

Strong objections, part of this site was reviewed under Application 411 on 2 Sept 2022 and Appeal dismissed on 3 May 2024 on the justification that

(a) the applied development is not in line with the planning intention of the "Green Belt" ("GB") zone, which is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl, as well **as to provide passive recreational outlets**. There is a general presumption against development within this zone.

Note the reference to PASSIVE.

The site should have been restored since then but as can be seen from the images is still filled in. Why was no enforcement action taken, there is no history of any approval for the remainder of the site so excavation of land has been illegal.

Members should question why restoration has not been carried out.

The data provided indicates heavy traffic of large vehicles to and from the site plus the need to frequently service the portable loos.

45 visitors – 200 per day (24 – 28 tour buses)

Every month there are numerous applications for Yuen Long approved by the board for:

|

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

Place of Recreation, Sports or Culture: It includes, unless otherwise specified indoor or outdoor stadium, **sports ground**/complex, fitness centre, gymnasium, public swimming pool/leisure pool, **sports training ground**, water recreation/sports centre, horse riding school, golf driving range, outdoor go-kart ground, radio control model aircraft flying field, outdoor radio control model car playing ground, motorcross ground, hobby farm, fishing ground, velodrome, oceanarium and aquarium.

The majority are for Agriculture zoning but some are for "GIC". In addition, there are many thousands of sq.mts of land zoned "Recreation" that are approved for brownfield use.

Facilities like this have numerous options re location. There is no justification to extend this use to "Green Belt" locations when the intended use of more appropriate zonings is abused.

Mary Mulvihill

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年03月31日星期二 18:14
收件者: tpbpd/PLAND
主旨: KFBG's comments on five planning applications
附件: 260331 s16 KTN 1218.pdf; 260331 s16 LFS 604.pdf; 260331 s16 NSW 357c.pdf; 260331 s16 SK 447c.pdf; 260331 s16 TT 774c.pdf

類別: Internet Email

Dear Sir/ Madam,

Attached please see our comments regarding five applications. There are five 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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The Secretary,
Town Planning Board,
15/F, North Point Government Offices,
333, Java Road, North Point,
Hong Kong.
(Email: tpbpd@pland.gov.hk)

31st March, 2026.

By email only

Dear Sir/ Madam,

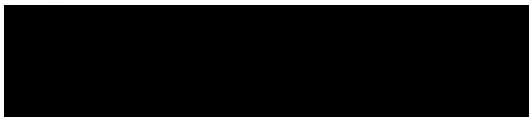
Proposed Temporary Baseball Training Centre for a Period of 3 Years
(A/YL-LFS/604)

1. We refer to the captioned.
2. The application site is within Green Belt (GB) zone and there is a rejected application (A/YL-LFS/411; Temporary Warehouse for Storage of Construction Materials for a Period of 3 Years and Filling of Land) covering the current site. The reasons for rejection of the review application of A/YL-LFS/411 are listed below:

(a) the applied development is not in line with the planning intention of the "Green Belt" ("GB") zone, which is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone. There is no strong planning justification in the submission for a departure from the planning intention;

(b) the applied development is not in line with the Town Planning Board Guidelines for 'Application for Development within the Green Belt zone under Section 16 of the Town Planning Ordinance' (TPB PG-No. 10) in that the applicant fails to demonstrate that the applied development would not have significant adverse environmental and landscape impacts on the surrounding areas; and

(c) approval of the application would set an undesirable precedent for similar



applications for warehouse use within the "GB" zone. The cumulative effect of approving such similar applications would result in a general degradation of the environment of the area.

3. We urge the Board to reject this application as it is unlikely to be in line with the planning intention of the GB zone.

4. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

