

**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 Applications covering the Application Site

Rejected Applications

	<u>Application No.</u>	<u>Proposed Use(s)/ Development(s)</u>	<u>Zoning</u>	<u>Date of Consideration (RNTPC)</u>	<u>Rejection Reasons</u>
1	A/YL-LFS/259	Temporary Warehouse for Plastic and Paper Products for a Period of 3 Years	GB	7.3.2014	(1), (2) and (4)
2	A/YL-LFS/280	Temporary Warehouse for Plastic and Paper Products for a Period of 3 Years	GB	23.10.2015	(1), (2) and (4)
3	A/YL-LFS/466	Temporary Recycling Workshop (Scrap Metals, Plastics, Papers and Electronics) for a Period of 3 Years and Filling of Land	GB	19.5.2023	(1) to (4)

Rejection Reasons

1. No strong justification in the submission for a departure from the planning intention.
2. Not in line with Town Planning Board Guidelines No. 10.
3. No sufficient information to demonstrate that the applied use would not have significant adverse traffic impact on the surrounding areas.
4. Setting an undesirable precedent.

**Similar s.16 Application within the same “Green Belt” Zone
on the Lau Fau Shan and Tsim Bei Tsui Outline Zoning Plan in the past 5 years**

Rejected Application

	<u>Application No.</u>	<u>Proposed Use(s)/ Development(s)</u>	<u>Zoning</u>	<u>Date of Consideration (RNTPC)</u>	<u>Rejection Reasons</u>
1	A/YL-LFS/432	Proposed Temporary Recyclable Collection Centre (Plastics and Aluminium) with Ancillary Office and Workshop for a Period of 3 years, and Filling and Excavation of Land	GB	26.8.2022	(1) to (3)

Rejection Reasons

1. No strong justification in the submission for a departure from the planning intention.
2. Not in line with Town Planning Board Guidelines No. 10.
3. No sufficient information to demonstrate that the proposed use would not generate adverse traffic impact on the surrounding areas.

Government Departments' General Comments

1. Land Administration

Comments of Chief Estate Surveyor/New Development Area (CES/NDA, LandsD):

The applicant is the affected business undertaking under the Northern Link Main Line Project. The proposed use of temporary recyclable collection centre and repair workshop tallies with his on-site observations at the location of the existing business undertaking of the applicant.

2. Traffic

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

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

3. Nature Conservation

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

- (a) He has no adverse comments on the application.
- (b) Although the Site falls within "Green Belt" zone, it has been paved and used as brownfield as decades. The ecological value is not high.
- (c) The applicant should note his advisory comments at **Appendix V**.

4. 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 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 Town Planning Board consider that the application is acceptable from the planning point of view, approval conditions should be stipulated requiring the applicant to submit, to implement and maintain the proposed drainage facilities to his satisfaction.

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

5. 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 the advisory comments at **Appendix V**.

6. Project Interface

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

- (a) 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.
- (b) If the planning permission is granted, notwithstanding its validity period, the applicant should note the advisory comments detailed in **Appendix V**.

7. Other Departments’ Comments

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

- (a) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (b) Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD);
and
- (c) Commissioner for Northern Metropolis Railways, HyD (C for NMR, HyD).

Recommended Advisory Clauses

- (a) to resolve any land issues relating to the development with the concerned owner(s) of 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/Yuen Long, Lands Department (DLO/YL, LandsD) that:
 - (i) the Site comprises Old Schedule Agricultural Lots (OSALs) and Government Land (GL). The OSALs are 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. No permission is given for occupation of GL (about 350m² subject to verification) included in the Site. The act of occupation of GL without Government's prior approval is an offence under Land (Miscellaneous Provisions) Ordinance (Cap. 28); and
 - (ii) the lot owner(s) shall apply to his office for Short Term Waiver(s) (STW(s)) and Short Term Tenancy(s) (STT(s)) to permit the structure(s) erected or to be erected within the private lots, if any and the occupation of GL. The application(s) for STWs and STT(s) will be considered by the Government in its capacity as a landlord and there is no guarantee that it/they will be approved. The STW(s) and STT(s), if approved, will be subject to such terms and conditions including the payment of waiver fee, rent 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;
- (d) 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 to the Site shall be constructed and maintained by the applicant. The run-in/out shall be removed and the public road shall be reinstated to the satisfaction of HyD upon completion of the use of Site;
- (e) to note the comments of the Commissioner for Transport that sufficient manoeuvring spaces shall be provided within the Site or its adjacent area and no vehicles are allowed to queue back to public roads or reverse onto/from public roads. The local track leading to the Site is not under 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;
- (f) to note the comments of the Director of Environmental Protection that the applicant is advised:
 - (i) that no breaking, washing, burning and melting activity, and use of chemicals is allowed on the Site at any time during the planning approval period;
 - (ii) to follow the latest "Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites";

- (iii) to follow the relevant guidelines and requirements in relevant Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs). It is noted that septic tank and soakaway system will be used at the Site, 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; and
 - (iv) to provide adequate supporting infrastructure/facilities for proper collection, treatment and disposal of waste/wastewater generated from the proposed use and to meet the statutory requirements under relevant environmental legislations such as the Waste Disposal Ordinance (Cap. 354) and its subsidiary Waste Disposal (Chemical Waste) (General) Regulation;
- (g) to note the comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) on the submitted drainage proposal that:
- (i) please advise if any site formation/levelling works to be carried out under this application. Cross sections showing the existing and proposed ground levels of the Site with respect to the adjacent areas should be given;
 - (ii) please confirm if any walls or hoarding are/to be erected or laid along the site boundary. If affirmative, adequate opening should be provided to intercept the existing overland flow passing through the Site and please provide its details for comments;
 - (iii) peripheral surface channels shall be provided along the site boundary at the existing ground level instead of revised level to collect the surface runoff accrued on the Site and to intercept the overland flow from the adjacent lands;
 - (iv) please demonstrate with hydraulic calculation 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;
 - (v) the applicant should check and ensure the hydraulic capacity of the existing drainage facilities would not be adversely affected by the captioned development;
 - (vi) the existing watercourse, to which the applicant proposed to discharge the stormwater from the Site was not maintained by this office. The applicant(s) shall resolve any conflict/disagreement arisen for discharging the runoff from the Site to the proposed discharge point(s). In the case that it is a local village drains, District Officer /Yuen Long should be consulted. Moreover, the applicant should ensure that this drainage system and the existing downstream drains/channels/streams have adequate capacity to convey the additional runoff from the Site. Regular maintenance should be carried out by the applicant to avoid blockage of the system;
 - (vii) further to (vi) above, since there is no record of the said discharge path, please provide site photos at different locations and views to demonstrate its presence and existing condition;

- (viii) the gradient and the size of the proposed U-channels should be shown on the drainage plan;
 - (ix) catchpit should be provided at the turning point of the proposed U-channel;
 - (x) please provide the connection details at the discharge point and indicate details (e.g. cover level, invert level and catchpit/watercourse bottom level) in the drawing;
 - (xi) standard details should be provided to indicate the sectional details of the proposed U-channel and the catchpit/sand trap;
 - (xii) the proposal should indicate how the runoff (the flow direction) within the Site would be discharged to the proposed U-channel. Please also indicate the flow direction in the proposed drainage system;
 - (xiii) the cover level and invert level of the proposed U-channels, catchpits/sand traps should be shown on the drainage plan;
 - (xiv) sand trap or provision alike should be provided before the collected runoff is discharged to the public drainage facilities;
 - (xv) the development should neither obstruct overland flow and nor adversely affect existing natural streams, village drains, ditches and the adjacent areas, etc.; and
 - (xvi) the applicant should resolve any conflict/disagreement with relevant lot owner(s) and seek permission from DLO/YL for laying new drains/channels and/or modifying/upgrading existing ones in other private lots or on Government Land, where required, outside the Site;
- (h) to note the comments of the Director of Fire Services on the submitted fire service installations (FSIs) proposal that:
- (i) for enclosed structure with gross floor area not exceeding 230m², portable fire extinguisher and stand-alone fire detector shall be provided;
 - (ii) for enclosed structure with gross floor area exceeding 230m², sprinkler system, wheeled type dry chemical fire extinguisher, stand-alone fire detector, emergency lighting and directional & exit signs shall be provided;
 - (iii) in relation to item (i) & (ii) above, if two or more stand-alone fire detectors are installed in an enclosed structure, all detectors shall be interconnected (either wired or wirelessly) such that when one of the detectors is triggered, all connected detectors shall sound an alarm simultaneously;
 - (iv) stand-alone fire detectors shall be provided in accordance with the “Stand-alone Fire Detector General Guidelines on Purchase, Installation & Maintenance [Sep 2021]”;

- (v) a 20-35 kg wheeled type dry chemical fire extinguisher shall be provided in every 500m² on every floor of the premises and ensure that every part of the premises can be reached from a distance of not more than 30m;
 - (vi) separation distance between each structure shall be clearly indicated on the plan;
 - (vii) in relation to item (vi) above, structures on the same site are regarded as adjoining structures if they are less than 1.8m apart. In this regard, sprinkler system, wheeled type dry chemical fire extinguisher, stand-alone fire detector, emergency lighting and directional & exit signs shall be provided if the total floor area exceeds 230m²;
 - (viii) provision of FSIs shall be demonstrated in form of FS Notes with all relevant standards and specifications; and
 - (ix) the applicant is reminded that if the proposed structures are required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire safety requirements will be formulated upon receipt of the formal submission of general building plans;
- (i) to note the comments of 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;
- (j) to note the comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that:
- (i) it is noted that three 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 should be obtained, otherwise they are unauthorized building works (UBW) under the BO. An Authorized Person 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) Regulations (B(P)R) respectively;
 - (iii) the Site does not abut on a specified street of not less than 4.5m wide and its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at the 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 the BA, they are UBW under the 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 the BO;
 - (vi) any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings and are subject to the control of Part VII of the B(P)R; and
 - (vii) detailed checking under BO will be carried out at building plan submission stage; and
- (k) to note the comments of Director of Agriculture, Fisheries and Conservation that the applicant is advised to take appropriate measures to prevent disturbing the “Coastal Protection Area” zone to the west and the watercourse to the south of the Site.

呈：元朗民政事務處
民政事務專員台鑑！

有關貴處檔號：（3）in 017-2811-045-040-003-1229-P001
丈量約份第 129 約多個地段和毗鄰政府土地
擬議臨時可循環再造物料回收中心及修理工場連附屬設施和相關填土工程
（為期 3 年）（申請編號：A/YL-LFS/618）

本圍村代表反對該個申請理由如下：

- （一）該擬議申請地段及政府土地在深灣路側，太靠近深灣路，該道路是單程雙向行車，非常狹窄，不適而這類行業落戶，極度影響環境！
- （二）該擬議申請地段及政府土地現規劃為綠化地帶，
- （三）該區域私人土地的任何申請都受到貴規劃署否決及嚴厲執法清場，
- （四）該擬議申請若獲批准，尤其是政府土地也獲批，缺口一打開就難以控制。
- （五）該擬議區域申請，我等村代表反建議政府要擴闊該條流浮山深灣路至尖鼻咀段為雙程道路，造福該區域市民及改善生活水平！深感銘唉！
- （六）該區域貴規劃署九成土地全規劃為綠化地帶、濕地保護地帶及國際濕地保育地帶！握刹業主權益及生活質素！
- （七）該深灣道路由建設至今已經60多年都是單程雙向行車，迄今已不適合時宜！特此函達！惟盼！

輞井圍村代表簽署：鄧鈞銘 (鄧鈞銘)

鄧輝泰 (鄧輝泰)

鄧南盛 (鄧南盛)

日期：2026 年 06 月 25 日

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年06月15日星期一 14:07
收件者: tpbpd/PLAND
主旨: KFBG's comments on seven planning applications
附件: 260615 s16 SK 457.pdf; 260615 s16 PN 91c.pdf; 260615 s16 LFS 618.pdf; 260615 s16 KTN 1242.pdf; 260615 s16 KTN 1238.pdf; 260615 s16 KTN 1237.pdf; 260615 s16 KTN 1236.pdf

類別: Internet Email

Dear Sir/ Madam,

Attached please see our comments regarding seven applications. There are seven 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)

15th June, 2026.

By email only

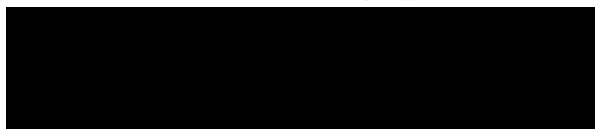
Dear Sir/ Madam,

**Proposed Temporary Recyclable Collection Centre and Repair Workshop with
Ancillary Facilities and Associated Filling of Land for a Period of 3 Years
(A/YL-LFS/618)**

1. We refer to the captioned.
2. There are three rejected applications covering the application site and the reasons for rejection of the latest one (A/YL-LFS/466; Temporary Recycling Workshop (Scrap Metals, Plastics, Papers and Electronics) for a Period of 3 Years and Filling of Land) are shown below.

(a) the applied use and associated filling of land are 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, even on a temporary basis;

(b) the applied use and associated filling of land are 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 applied use and associated filling of land are considered not compatible with the surrounding areas, and the applicant fails to demonstrate that the proposed use and associated filling of



land would not have significant adverse environmental and landscape impacts on the surrounding areas;

(c) the applicant fails to demonstrate that the applied use would not have significant adverse traffic impact on the surrounding areas; and

(d) approval of the application would set an undesirable precedent for similar applications 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 not in line with the planning intention of the Green Belt zone. If the Board decides to approve the application, we would also like the Board to consider whether the site needs to be reinstated after the planning permission expires and, if so, whether this should be set as an approval condition.

4. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年06月21日星期日 23:33
收件者: tpbpd/PLAND
主旨: A/YL-LFS/618 DD 129 Lau Fau Shan Green Belt
類別: Internet Email

Dear TPB Members,

Are you going to accept this relocation sob story at face value when the history of the site underlines years of illegal operation.

466 was rejected 19 May 2023. Back with a reduction in GL to 350sq.m and increase in parking to 5.

The sob story at that time was *"the applicant's business has been hard hit by the social unrest and the pandemic, and the applicant had borrowed a substantive sum to sustain his business. The use at the Site was recently subject to planning enforcement action which required immediate discontinuation of his business. Approval of the application would bring hope for his family's survival without the need for Government's financial assistance"*

It appears from the images that there has been no cessation of operation and now back under a company name with a relocation line.

The credibility of the planning process has already been considerably undermined by the various tricks and manipulations employed to allow brownfield to expand to an alarming rate, but approval of this application would indicate that integrity has been entirely abandoned.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Monday, 1 May 2023 2:57 AM HKT
Subject: Re: A/YL-LFS/466 DD 129 Lau Fau Shan Green Belt

A/YL-LFS/466

Lots 603 RP (Part), 614 (Part), 615 (Part), 616 (Part), 617 and 618 (Part) in D.D.129 and Adjoining Government Land, Lau Fau Shan

Site area : About 2,853SQ.M includes Government Land of about 422 m²

Zoning "Green Belt"

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Applied Use: Recycling Workshop (Scrap Metals, Plastics, Papers and Electronics) / 2 Vehicle Parking / **Filling of Land**

Dear TPB Members,

Strongest objections. Previous applications have been rejected. However it appears that that the operation went ahead regardless.

*The applicant also **intends to regularise the concrete-paving** (covering entire site with a depth of 0.12m) on-site,*

Has enforcement action been taken?

The lots are close to "CPA". In line with pledges made with regard to global warming and the warnings from experts in China that our coast line will be exposed to increasing impact from rising sea levels, etc, it is essential that this sensitive area is not turned into one big brownfield, whatever the bleatings from the business sector.

Mary Mulvihill

From: [REDACTED]

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

Date: Monday, 21 September 2015 12:13 AM CST

Subject: A/YL-LFS/280 Lau Fau Shan

A/YL-LFS/280

Various Lots D.D.129 and Adjoining Government Land, Lau Fau Shan, Yuen Long

Site area : About 3,542.00 includes Government Land of about 582.00 m²

Zoning "Road" and "Green Belt"

Applied Use : Temporary Warehouse for Plastic and Paper Products

Dear TPB Members,

There is obviously no reason why this application should be rejected for the same reasons as on 7 March 2014. The creation of additional brownfield sites is undesirable as policy is to reduce and combine similar activities in multi storey facilities in order to save land for more useful purposes, particularly GB and government land.

(a) the development is not in line with the planning intention of the "Green Belt" ("GB") zone, which is to define 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 no strong planning justification in the submission for a departure from the planning intention even on a temporary basis;

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(b) the development is not in line with the Town Planning Board Guidelines No. 10 for Application for Development within "GB" Zone in that the development would affect the existing natural landscape in the area and the applicant fails to demonstrate that the proposed development would not have any adverse landscape impacts. The development is also incompatible with the surrounding rural environment; and

(c) approval of the application would set an undesirable precedent for similar open storage and warehouse use in the "GB" zone, the cumulative effect of which would result in a general degradation of the environment of the area."

Mary Mulvihill

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寄件者: [REDACTED]
寄件日期: 2026年06月23日星期二 14:43
收件者: tpbpd/PLAND
主旨: WWF s16_A_YL-LFS_618 20260623 WWF
附件: s16_A_YL-LFS_618 20260623 WWF.pdf
類別: Internet Email

Dear Sir/Madame,

Attached please find our submission regarding the planning application A/YL-LFS/618.

Thank you for your attention.

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

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世界自然基金會
香港分會

WWF-Hong Kong

23 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 Recyclable Collection Centre and Repair Workshop
with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years in
the "Green Belt" in Lau Fau Shan (A/YL-LFS/618)**

We would like to reject the captioned.

Not in line with the planning intention

The proposed development, even on a temporary basis, is inconsistent with the planning intention of the "Green Belt" (GB) zone. The GB zoning aims to define the limits of urban and suburban development through natural landscape features, prevent urban sprawl, and provide opportunities for passive recreation. As illustrated in Figure 1, the surrounding area of the site remains largely rural in character though several suspected unauthorized developments, including "Destroy-first" cases, are present in the vicinity.

Inadequate planning information on environmental risks and landscape impact

The applicant has failed to demonstrate that the proposed use, together with the associated land filling works, would not result in significant adverse environmental impacts, particularly in terms of increased flooding risk and detrimental landscape effects on the surrounding areas.

Undesirable precedent

Approval of the application would set an undesirable precedent for similar developments within the GB zone. The cumulative effect of approving such applications would likely lead to a general degradation of the area's environmental and landscape quality.

together possible™

贊助人：中華人民共和國
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核數師：富源瑞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
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Suspected unlawful development within the application site

Compared with Google's aerial imageries, the Application Site remained largely intact in 2008 and vegetated until the 2012 when the site appears to have been used as an open storage (Fig. 2). This use is unlikely to be consistent with the GB zoning and we were unable to identify any relevant planning permission from the Town Planning Board's website/portal. While we do not have up-to-date information on the current land use status of the Site, nor confirmation of whether an unauthorized change of use has occurred, we would appreciate it if the Town Planning Board could request the relevant government departments to investigate any potential illegal land use or development associated with the Application Site. Should any such irregularities be confirmed, we respectfully request that the Town Planning Board reject the application, so as not to legitimize any unlawful land use prior to the granting of planning approval.

We would be grateful if our comments could be considered.

Kind regards,

Mr. Tobi Lau

Senior Manager, HK Biodiversity and Conservation Policy

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Figure 1. Aerial view of the application site and its surroundings



Image source: Google Earth (Accessed on 23 June 2026)

Figure 2. Aerial views of application site taken in 2008, 2012 and 2024 which show that the site has likely been using as vehicle park since 2012 or earlier



Image source: Google Earth (Accessed on 23 June 2026)