

Relevant Extracts of Town Planning Board Guidelines for
Application for Open Storage and Port Back-up Uses
under Section 16 of the Town Planning Ordinance (TPB PG-No. 13G)

1. On 14.4.2023, the Town Planning Board Guidelines for Application for Open Storage and Port Back-up Uses under Section 16 of the Town Planning Ordinance (TPB PG-No. 13G) were promulgated, which set out the following criteria for the various categories of area:
 - (a) Category 1 areas: favourable consideration will normally be given to applications within these areas, subject to no major adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions. Technical assessments should be submitted if the proposed uses may cause significant environmental and traffic concerns;
 - (b) Category 2 areas: planning permission could be granted on a temporary basis up to a maximum period of 3 years, subject to no adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions. Technical assessments, where appropriate, should be submitted to demonstrate that the proposed uses would not have adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas;
 - (c) Category 3 areas: applications would normally not be favourably considered unless the applications are on sites with previous planning approvals (irrespective of whether the application is submitted by the applicant of previous approval or a different applicant). Sympathetic consideration may be given if genuine efforts have been demonstrated in compliance with approval conditions of the previous planning applications and/or relevant technical assessments/proposals have been included in the fresh applications, if required, to demonstrate that the proposed uses would not generate adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas. Planning permission could be granted on a temporary basis up to a maximum period of 3 years, subject to no adverse departmental comments and local objections, or the concerns of the departments and local residents can be addressed through the implementation of approval conditions; and
 - (d) Category 4 areas: applications would normally be rejected except under exceptional circumstances. For applications on sites with previous planning approvals (irrespective of whether the application is submitted by the applicant of previous approval or a different applicant), and subject to no adverse departmental comments and local objections, sympathetic consideration may be given if genuine efforts have been demonstrated in compliance with approval conditions of the previous planning applications and/or relevant technical assessments/proposals have been included in the fresh application, if required, to demonstrate that the proposed uses would not generate adverse drainage, traffic, visual, landscaping and environmental impacts on the surrounding areas. The intention is however to encourage the phasing out of such non-conforming uses as early as possible. A maximum period of 3 years may be allowed for an applicant to identify suitable sites for relocation. Application for renewal of approval will be assessed on its individual merits.

2. In assessing applications for open storage and port back-up uses, the other major relevant assessment criteria are also summarised as follows:
- (a) port back-up sites and those types of open storage generating adverse noise, air pollution, visual intrusion and frequent heavy vehicle traffic should not be located adjacent to sensitive receivers such as residential dwellings, hospitals, schools and other community facilities;
 - (b) port back-up uses are major generators of traffic, with container trailer/tractor parks generating the highest traffic per unit area. In general, port back-up sites should have good access to the strategic road network, or be accessed by means of purpose built roads;
 - (c) adequate screening of sites through landscaping and/or fencing should be considered where sites are located adjacent to public roads or are visible from surrounding residential areas;
 - (d) there is a general presumption against conversion of active or good quality agricultural land and fish ponds to other uses on an ad-hoc basis. For flood prone areas or sites which would obstruct natural drainage channels and overland flow, advice should be sought;
 - (e) for applications involving sites with previous planning approvals, should there be no evidence to demonstrate that the applicants have made any genuine effort to comply with the approval conditions of the previous planning applications, planning permission may be refused notwithstanding other criteria set out in the Guidelines are complied with; and
 - (f) having considered that the open storage and port back-up uses have a role to play in Hong Kong's economy and provide considerable employment opportunities, and the operators/uses affected by resumption and clearance operations of the Government to make way for developments may face difficulties in finding a replacement site, sympathetic consideration could be given to such type of applications, except those involving land in Category 4 area (only minor encroachment may be allowed), if the following criteria are met:
 - (i) policy support is given by the relevant bureau(x) to the application for relocation of the affected uses/operations to the concerned sites; and
 - (ii) no adverse departmental comments and local objections, or the concerns could be addressed by approval conditions.

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

Approved Applications

	Application No.	Use/Development	Date of Consideration
1.	A/YL-KTN/640	Proposed Temporary Public Vehicle Park (Excluding Container Vehicle) for a Period of Five Years	22.2.2019 [revoked on 22.5.2021]
2.	A/YL-KTN/1048	Proposed Temporary Shop and Services for a Period of Five Years	10.1.2025 [revoked on 10.7.2026]

Rejected Application

	Application No.	Use/Development	Date of Consideration	Rejection Reasons
1.	A/YL-KTN/168	Proposed 74 Houses (Other than New Territories Exempted House) & Minor Relaxation of Building Height Restriction from 8.23m to 9m	19.3.2004 [Upon Review]	(1) to (3)

- (1) The proposed development was not in line with the planning intention of the “Village Type Development” zone.
- (2) There was no information in the submission to demonstrate that the proposed development would not cause adverse traffic and drainage impacts on the surrounding area.
- (3) Approval of the application would set an undesirable precedent for similar residential developments to proliferate in the area. The cumulative effect of approving such similar applications would reduce the land available for Small House development.

Government Departments' General Comments

1. Land Administration

Comments of the District Lands Officer/Yuen Long, Lands Department:

- the application site (the Site) comprises Old Schedule Agricultural Lot(s) 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;
- there is no Small House application approved or under processing at the Site; and
- advisory comments are at **Appendix V**.

2. Traffic

Comments of the Commissioner for Transport:

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

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

- no in-principle objection to the application from highways maintenance point of view;
- if the proposed access at Kong Tai Road is approved by Transport Department, the applicant should ensure that a run-in/out is constructed in accordance with the latest version of HyD's Standard Drawings no. H1113 and H1114, or H5133, H5134 and H5135, whichever set is appropriate to match with the existing adjacent pavement; and
- advisory comments are at **Appendix V**.

3. Environment

Comments of the Director of Environmental Protection:

- no objection to the application from environmental planning perspective;
- the applicant has proposed a number of mitigation measures, including relocation loading/unloading spaces for heavy goods vehicles to the southwestern part of the Site and erection of boundary wall consisting of sound-proofing materials with surface density of not less than 10kg/m² along the western and eastern boundaries of the Site, to control potential noise impact from the applied use. The applicant should fully implement the proposed measures;

- there was no substantiated environmental complaint received against the Site in the past three years; and
- advisory comments are at **Appendix V**.

4. **Drainage**

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

- no in-principle objection to the application from drainage point of view;
- should the application be approved, conditions should be stipulated requiring the submission of a revised drainage proposal and the implementation and maintenance of the drainage facilities identified in the revised drainage proposal for the applied use to the satisfaction of the Director of Drainage Services or of the Town Planning Board; and
- advisory comments are at **Appendix V**.

5. **Fire Safety**

Comments of the Director of Fire Services:

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

6. **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 was situated in an area of miscellaneous rural fringe landscape character comprising village houses, low-rise residential developments, Kam Tin River, open storage sites/warehouses and scattered tree groups. The applied temporary use is considered not incompatible with the landscape setting in the proximity;
- according to the aerial photo and site photos, the Site was generally formed. The Site was formed. Temporary structures and construction materials were found on it. No tree was observed within the Site. According to the Application Form, no tree felling will be involved; and
- in view of the above, significant adverse landscape impact arising from applied use is not anticipated.

7. **Nature Conservation**

Comments of the Director of the Agriculture, Fisheries and Conservation:

- no comment on the application from nature conservation perspective;
- advisory comments are at **Appendix V**.

8. **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 particular comment on the application.

9. **Other Departments**

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

- Chief Engineer/Construction, Water Supplies Department;
- Chief Building Surveyor/New Territories West, Buildings Department;
- Director of Electrical and Mechanical Services; and
- Project Manager (West), Civil Engineering and Development Department.

Recommended Advisory Clauses

- (a) prior planning permission should have been obtained before commencing the applied use at the application site (the Site);
- (b) to resolve any land issues relating to the applied use with the concerned owner(s) and/or occupant(s);
- (c) to note the comments of the District Lands Officer/Yuen Long, Lands Department (LandsD) that the lot owner(s) shall apply to his office for Short Term Waiver(s) (STWs) to permit the structure(s) erected within the said private lot. 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 applied use is temporary in nature, only erection of temporary structure(s) will be considered;
- (d) 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; during the planning approval period;
- (e) 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 Tai Road, including any 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;
- (f) to note the comments of the Director of Environmental Protection that:
 - (i) the applicant shall ensure heavy goods vehicles only operate in the southwestern part of the Site as far as practicable;
 - (ii) the applicant shall properly erect and maintain the proposed boundary wall along the western and eastern boundaries of the Site. The boundary wall should consist of sound-proofing materials with surface density of not less than 10kg/m². Any gaps, holes or slits in the boundary wall should be avoided as far as practicable;
 - (iii) the applicant shall follow the revised 'Code of Practice on Handling the

Environmental Aspects of Temporary Uses and Open Storage Sites’;

- (iv) 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’;
 - (v) the applicant shall provide adequate supporting infrastructure/facilities for proper collection, treatment and disposal of waste/wastewater generated from the applied use; and
 - (vi) the applicant shall meet the statutory requirements under relevant environmental legislation, in particular the Noise Control Ordinance (Cap. 400);
- (g) to note the comments of the Chief Engineer/Mainland North, Drainage Services Department that:
- (i) the detailed comments on the drainage proposal previously provided to the applicant shall be taken into account in the revised drainage proposal; and
 - (ii) to encourage a higher quality submission and avoid rounds of comments, thereby shortening the processing time, the applicant shall complete the checklist previously provided in preparing the drainage proposal and include the checklist in the submission. Otherwise, a longer processing time may be required by her office;
- (h) to note the comments of the Director of Fire Services that:
- (i) the applicant shall submit relevant layout plans incorporated with the proposed fire service installations (FSIs) to his department for approval. The layout plans should be drawn to scale and depicted with dimensions and nature of occupancy. The location of proposed FSIs to be installed should be clearly marked on the layout plans; and
 - (ii) if any 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;
- (i) 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 watercourse nearby (**Plan A-2**) during construction and operation;
- (j) to note the comments of the Chief Engineer/Construction, Water Supplies Department (WSD) that:
- (i) existing water mains will be affected (**Plan A-2**). The cost of any necessary diversion shall be borne by the applied use;
 - (ii) in case that it is not feasible to divert the affected water mains, a waterworks reserve within 1.5 metres from the centre line of the water mains shall be provided for WSD’s access. No structure shall be built or materials stored within this waterworks reserve. Free access shall be made available at all times for staff of the Director of Water Supplies or their contractor to carry out construction,

inspection, operation, maintenance and repair works;

- (iii) no trees or shrubs with penetrating roots may be planted within the waterworks reserve or in the vicinity of the water mains; and
 - (iv) the Government shall not be liable to any damage whatsoever and howsoever caused arising from burst or leakage of the public water mains within and in close vicinity of the Site; and
- (k) to note the comments of the Chief Building Surveyor/New Territories West, Buildings Department (BD) that:
- (i) it is noted that 15 structures 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 application site (the Site), prior approval and consent of the Building Authority (BA) should be obtained, otherwise they are unauthorized building works (UBW) under the Buildings Ordinance (BO). An Authorized Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO;
 - (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 abut a specified street (Kong Tai Road) of not less than 4.5m wide. Its permitted development intensity shall be determined under the First Schedule of the B(P)R, where no plot ratio/gross floor area restriction has been stipulated in statutory plans/approved planning applications;
 - (iv) if the existing structures (not being 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 applied 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; and
 - (vii) detailed checking under BO will be carried out at building plan submission stage.

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年07月24日星期五 22:46
收件者: tpbpd/PLAND
主旨: A/YL-KTN/1251 DD 109 Kam Tin Mall
類別: Internet Email

CORRECT ERROR IN SUBJECT LINE

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Friday, 24 July 2026 10:43 PM HKT
Subject: Re: A/YL-KTN/1168 DD 109 Kam Tin Mall

A/YL-KTN/1251
Lots 1198 S.B (Part) and 1199 RP (Part) in D.D. 109, Kam Tin
Site area: About 7,400sq.m
Zoning: "VTD"
Applied use: Open Storage / 12 Vehicle Parking

Dear TPB Members,

1168 withdrawn and finally operator submits an application for the real intention, Open Storage.

To approve a large OS on 'V' zone that can never be Cat 2 designation and with issues of contamination of watercourse and impact on waterworks reserve will demonstrate that all regulations pertaining to land use have now been abandoned.

The goal is clearly not to develop 22nd century Technopolis but ASIA'S BROWNFIELD HUB.

It is clear from the correspondence that the operator has been assured that the application will be rubberstamped.

All hope is lost.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Thursday, 18 December 2025 3:48 AM HKT
Subject: Re: A/YL-KTN/1168 DD 109 Kam Tin Mall

Dear TPB Members,

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5.3 Consistent with "Village Type Development" zoning objectives???????

This is 7,000++sq.mts of Warehouse.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Tuesday, 7 October 2025 3:30 AM HKT
Subject: A/YL-KTN/1168 DD 109 Kam Tin Mall

Dear TPB Members,

1048 was streamlined on 10 Jan 2025 and approved by members without a single question being raised as to whether the development fulfils the guidelines pertaining to the 'V' zone.

In order to tell the 'Good Story', the developer presented the project as a service to fulfill the daily needs of locals:

*"15 single-storey structures with a total floor area of about 1,736m² and building heights of not more than 3.5m for shop and services (**including convenience stores, retail shops, medical consulting rooms, barber shops and beauty parlours**), ancillary office, storeroom, guard house, electricity meter room, water tank and pump room"*

But now it is back with the real deal, BROWNFIELD, AND THIS IS REFLECTED IN THE REDUCTION TO A 3 YEAR APPROVAL TERM.:

*"17 single-storey structures with a total floor area of about 1,406.41m² retail store for **hardware and building materials**"*

That the shops are not intended to fulfil local retail demand is evident. This is a hardware market that would attract shoppers from many corners and certainly increase the number of heavy goods vehicles on local roads. The traffic impact is not properly presented in the paper.

Perhaps board members could do their duty this time around and inquire into matters, but we are not holding our breath.

The proposed use is in no way compatible with the "V" zone.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>

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Date: Thursday, 26 September 2024 2:36 AM HKT

Subject: A/YL-KTN/1048 DD 109 Kam Tin Mall

Dear TPB Members,

926 withdrawn and further tweaking to the plan.

While the applicant states that "The proposed use provides additional amenities and services alternatives to the local residents and would bring convenience and vitality to the neighbourhood", the board must take into consideration that retail outlets on "V" zone are intended to serve residents of the village itself, not large private residential complexes like Seasons Monarch that should incorporate adequate services within its own boundaries and "R" zoning.

Previous comments relevant and upheld.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Sunday, 9 July 2023 6:03 AM HKT
Subject: A/YL-KTN/926 DD 109 Kam Tin Mall

A/YL-KTN/926

Lots 1198 S.B (Part) and 1199 RP (Part) in D.D. 109, Kam Tin

Site area : About 7,414.8sq.m

Zoning: "VTD"

Applied use: Shop and Services / 5 Years / 18 Vehicle Parking

Dear TPB Members,

So 919 withdrawn and now its Mega Store.

Objections to layout and disposition of the 'shopping centre'. This is a series of 'sheds' with some parking. If the shopping outlets are required in the district then they should be accommodated in properly planned and built facilities complete with proper toilets, adequate drainage and fire services, roof top cafes and sitting out areas.

Temporary arrangements encourage cost cutting and short cuts. It is high time that retail and F&B outlets in NT villages provide a more first world experience.

Mary Mulvihill

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From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Tuesday, 20 June 2023 3:38 AM CST
Subject: Re: A/YL-KTN/919 DD 109 Kam Tin

A/YL-KTN/919

Lots 540 (Part), 1198 S.B (Part) and 1199 RP (Part) in D.D. 109 and Adjoining Government Land, Tai Kong Po, Pat Heung

Site area: About 8,447sq.m Includes Government Land of about 942sq.m

Zoning: "VTD"

Applied use: 173 Vehicle Parking

Dear TPB Members,

Strong Objections. Part of the site was approved for a smaller parking facility but conditions were not fulfilled and the site was not reinstated.

REVOKED ON 22.5.2021: 640

As the applicant had failed to comply with conditions (f), (g) & (i) satisfactorily by 22.5.2021, the planning permission for the subject application had already been revoked on the same date.

The lots have been stripped of vegetation. Has any enforcement action been taken as the site includes almost 1,000sq.m of government land?

At grade parking is a most inefficient use of such a large site. How come the administration has not selected this site for public housing, compatible with the zoning and close to transport?

Throwing in the electric charging is brownie points.

Members should reject the application as such a large parking facilities is out of proportion to any possible need on the part of villagers. Private developments should provide adequate facilities within their compounds.

Mary Mulvihill

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From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Friday, 25 January 2019 10:31 PM CST
Subject: A/YL-KTN/640 DD 109 Kam Tin

A/YL-KTN/640
Lot 1198 S.B (Part) in D.D. 109, Kam Tin
Site area : 1,130m²
Zoning : "VTD"
Applied Use : 26 Vehicle Parking **5 Years**

Dear TPB Members,

Another application to legitimize long term brownfield use, see Google Maps.

At grade parking is most inefficient use of scarce land resources and must be phased out. In this case more than 40sqmts per vehicle, the size of a two bedroomed family unit.

TPB members should recognize the part they have been playing a role in the proliferation of brownfield sites and degradation of the countryside via their far too liberal approval of that most inefficient land use, at grade parking. Vehicles should be parked underground, in custom built high rise towers or on the ground floor of 2,100sqft Net houses or villa developments. .

If parking is indeed required it should be provided in stacked facilities, see attached, thereby freeing up land for other uses. This is obviously an ongoing commercial activity. Please question TD on the ramifications with regard to guidelines and the requisite permit for such uses. Is the revenue being taxed?

As land owners and government departments are reluctant to move forward then TPB should provide impetus by rejecting these plans.

Mary Mulvihill

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

參考編號

260724-235107-79746

Reference Number:

提交限期

24/07/2026

Deadline for submission:

提交日期及時間

24/07/2026 23:51:07

Date and time of submission:

有關的規劃申請編號

A/YL-KTN/1251

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. CHAU

Name of person making this comment:

意見詳情

Details of the Comment :

致：城市規劃委員會主席及全體委員

我們是一群受影響的元朗錦田北（大江埔村）居民及周邊社區業主。就上述地段擬申請劃作「臨時露天存放建築材料和建築機械」為期3年的規劃許可，我們表達最極端之憤慨與強烈反對！

肇事地點早已被申請人違規「先破壞、後申請」，現場已被未授權填土硬化，並已大量堆放巨型工字鐵、鋼喉及重型機械。此違法營運對鄰近居民日常生活的安全、道路交通及水患防禦造成極度嚴重的負面影響。我們促請城市規劃委員會（城規會）秉持公義，堅決否決此項申請，並即時交由執法部門取締違規發展。

以下為我們提出的六大核心反對理據：

一、違法「先破壞、後申請」，公然挑戰城市規劃法治精神

1. 肇事地段在未獲城規會任何規劃許可前，已被大規模違規泥頭填土及鋪設水泥/泥硬地。規劃署早前實地考察已明確證實：該地已存在未獲批准的露天堆場用途（Site inspection confirmed the Site has been used as open storage of construction materials）。

2. 現時現場已擺放大量巨型工字鐵（H-Beams）、鋼喉、金屬棚架及重型起重車輛。申請人採用典型的**「先破壞、後申請」（Destroy First, Apply Later）**不法手段，意圖製造「既定事實」（Done Deal）逼使城規會就範。

3. 若城規會批准是次申請，將等同變相鼓勵及合理化違規違法發展，嚴重削弱本港城市規劃條例的權威與法律嚴肅性，給社會樹立極其惡劣的先例。

二、江大路為村民唯一主要通道，大型重型車輛造成致命交通危險與嚴重癱瘓

1. 江大路（Kong Tai Road）是橋頭村及附近村民唯一通往居住環境及出入外面的主要道路。該路段路面極其狹窄，周邊並無獨立行人路，平日常有村中長者、學童步行出入，以及單車使用者行駛。

2. 根據申請人提交的工程文件（包括用途分佈圖及回應意見），場內將安排高達30噸重的巨型起重吊車（吊雞車，車長達11.5米、吊臂延伸達24-28米）、6個大型貨櫃拖架泊位、4個重型貨車位及多部3噸鏟車頻繁進出。

3. 江大路的道路結構及闊度根本無法承載此等超大型工程車輛。重型拖車及30噸吊車的頻繁轉彎及進出，將直接切斷村民唯一的出入通道，造成日常交通大癱瘓，更對每日行

經江大路的村民生命安全構成不可接受的極高威脅！

三、 違規填土破壞自然吸水力，大幅增加低窪鄉村水浸致命隱患

1. 申請地點鄰近錦田河及低窪村落（橋頭村及大江埔村一帶）。肇事地段原為自然土地，現已被申請人未經批准擅自進行大面積填土及硬化。
2. 大面積填土徹底削弱了該土地原有的自然滲水及蓄水能力。在暴雨期間，高達數千平方米硬化地表所產生的龐大地表徑流（Surface Runoff），將無處宣洩，直接湧向鄰近的低窪村屋及鄉村渠道。
3. 此舉大幅提高了雨季暴雨期間周邊居民房屋受水浸威脅的風險，直接威脅村民的財產及生命安全。

四、 嚴重違反「鄉村式發展」規劃意向，與鄉村居住環境極不兼容

1. 根據《錦田北分區計劃大綱核准圖編號 S/YL-KTN/11》，該地段明確劃為**「鄉村式發展」地帶**。「V」地帶的法定規劃意向旨在預留土地作原居村民興建丁屋及鄉村擴展，維護安靜宜居的鄉村居住環境。
2. 露天存放巨型金屬工字鐵、鋼喉、金屬棚架及30噸重型起重機械，屬於高污染、高風險的工業/露天堆場用途，與「鄉村式發展」地帶的規劃意向完全背道而馳，嚴重破壞鄉村景觀，對鄉村居民造成嚴重的環境及視覺破壞。

五、 巨響噪音、廢氣塵埃干擾日常生活，嚴重破壞居民品質

1. 申請營運時間為星期一至六朝九晚六（每週6天）。場內使用30噸吊雞車及鏟車進行金屬工字鐵、鋼喉的裝卸、搬運及高達4米的金屬堆疊作業。金屬物料搬運過程中產生的撞擊巨響、金屬刮磨聲及低頻引擎噪音，將全天候籠罩鄉村。
2. 此外，重型柴油車輛頻繁啟動與駛過，揚起大量粉塵，並排放濃度極高的柴油廢氣，對周邊村民（特別是長者及幼童）的呼吸道健康造成直接傷害，嚴重破壞居民原本安寧的日常生活。

六、 申請人過往不遵從紀錄不良，欠缺誠信無法保障公共利益

1. 申請文件（第7頁第1點）明確承認：該地點先前曾有規劃申請（編號：A/YL-KTN/1048），但該申請因申請人未能履行規劃許可附帶之條件而遭城規會撤銷許可。
2. 事實證明，申請人過往已有不履行規劃條件的違規撤銷紀錄，如今更變本加厲進行「未批先用」的違法露天堆場營運。申請人毫無誠信可言，城規會絕不可再給予任何口頭承諾或條款約束的空間，必須果斷拒絕！

【全體受影響居民之核心訴求】

1. 堅決否決 規劃申請編號 A/YL-KTN/1251，拒絕任何形式之臨時露天堆場許可。
2. 即時執法取締：促請地政總署及規劃署中央執行及管制組即時採取清拆及執法行動，指令肇事者清走場內所有工字鐵、鋼喉及重型機械。
3. 指令恢復原狀：勒令肇事者清理違規填土，恢復土地原有狀態及排水能力，還村民一個安全、安寧的居住環境！

鄉村宜居環境及村民的生活安全不容剝削！我們強烈要求城市規劃委員會諸位委員以居民安全及社會公義為依歸，嚴格把關，捍衛規劃制度，徹底否決此項申請。