

**Relevant extract of the 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 main planning criteria for assessing applications for development within the “Green Belt” (“GB”) zone under s.16 of the Town Planning Ordinance are:

- (a) There is a general presumption against development (other than redevelopment) in a “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.

**Similar s.16 Applications for Temporary Warehouse
in the vicinity of the Site within the “Agriculture” zone
in the Hung Lung Hang Area**

Approved Applications

	Application No.	Uses/Developments	Date of Consideration
1	A/NE-HLH/51 ¹	Proposed Temporary Warehouse and Open Storage of Construction Machinery and Construction Materials for a Period of 3 Years	27.8.2021 (revoked on 27.5.2023)
2	A/NE-HLH/68 ¹	Temporary Open Storage and Warehouse of Construction Machinery and Construction Materials for a Period of Three Years	24.5.2024
3	A/NE-HLH/71	Temporary Open Storage and Warehouse of Construction Machinery for a Period of Three Years and Associated Filling of Land	10.5.2024 (revoked on 10.11.2025)
4	A/NE-HLH/77 ²	Proposed Temporary Container Storage Yard, Container Vehicle Park, Vehicle Repair Workshop, Logistics Centre, Warehouse and Open Storage of Miscellaneous Goods with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	22.11.2024 (revoked on 22.8.2026)
5	A/NE-HLH/79	Temporary Warehouse for Storage of Office Stationery and Equipment Supplies for a Period of 3 Years	14.3.2025
6	A/NE-HLH/82	Proposed Temporary Warehouse (excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years	5.9.2025
7	A/NE-HLH/85	Proposed Temporary Warehouse for Storing Car Parts with Ancillary Office and Associated Filling of Land for a Period of 3 Years	19.9.2025
8	A/NE-HLH/89	Temporary Warehouse (excluding Dangerous Goods Godown) and Open Storage of Miscellaneous Goods with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years	6.2.2026
9	A/NE-HLH/91 ²	Proposed Temporary Container Storage Yard, Container Vehicle Park, Vehicle Repair Workshop, Logistics Centre, Warehouse and Open Storage of Miscellaneous Goods with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	24.7.2026

Remarks

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

*2: Applications No. A/NE-HLH/77 and A/NE-HLH/91 involve the same site.

Government Departments' General Comments

1. Traffic

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

- no comment on the application from highways maintenance perspective; and
- his advisory comments are at **Appendix V**.

2. Environment

Comments of the Director of Environmental Protection (DEP):

- no objection to the application from environmental planning perspective, as no heavy vehicle nor dusty operation is involved;
- no comment on the proposed associated filling of land from environmental planning perspective subject to implementation of mitigation measures as listed in the Recommended Pollution Control Clauses for Construction Contracts;
- there were 12 non-substantiated environmental complaints, which were related to flytipping, filling of land or blocking of water channel in 2026, pertaining to the Site received in the past three years. His office observed no on-going flytipping nor filling of land on site, but sign of excavation work, concreting work and existing construction and demolition waste were noted on site; and
- his advisory comments are at **Appendix V**.

3. Drainage

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

- no objection to the application from public drainage viewpoint;
- should the application be approved, approval conditions should be included to request the applicant to submit and implement a drainage proposal for the Site to ensure that it will not cause adverse drainage impact to the adjacent area, and the implemented drainage facilities at the Site shall be maintained at all times during the planning approval period;
- the Site is in an area where no public sewerage connection is available. DEP should be consulted regarding the sewage treatment/disposal facilities for the proposed uses; and
- her advisory comments are at **Appendix V**.

4. **Fire Safety**

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

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

5. **Electricity Supply Safety**

Comments of the Director of Electrical and Mechanical Services (DEMS):

- no in-principle objection to the application from electricity supply safety aspect;
- it is noted that there are 400kV extra high voltage overhead lines running across/within the Site; and
- his advisory comments are at **Appendix V**.

6. **Building Matters**

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

- no objection to the application;
- it is noted that two structures are proposed in the application. Before any new building works are to be carried out on site, prior approval and consent of the Building Authority (BA) should be obtained unless they are exempted building works or commenced under the simplified requirement under the Minor Works Control System, otherwise they are unauthorized building works under the Buildings Ordinance (BO). An Authorized Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO; and
- his advisory comments are at **Appendix V**.

7. **Other Departments**

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

- Project Manager (North), Civil Engineering and Development Department (PM(N), CEDD);
- Head of Geotechnical Engineering Office, CEDD (H(GEO), CEDD);
- Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and
- District Officer (North), Home Affairs Department (DO(N), HAD).

Recommended Advisory Clauses

- (a) 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/North, Lands Department (DLO/N, LandsD) that:
- (i) the Site comprises Government land (GL) and Old Schedule Agricultural Lots held under the Block Government Leases which contain the restriction that no structures are allowed to be erected without the prior approval of the Government. The proposed ingress/egress of the Site is required to pass through GL but no right of access via GL is granted to the Site;
 - (ii) no consent is given for inclusion of GL in the Site;
 - (iii) the following irregularity covered by the subject planning application has been detected by his office:
 - Unauthorised structures within Lot 169 in D.D. 86 covered by the planning application

there are unauthorised structures on Lot 169 in D.D. 86. The lot owner should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice;
 - (iv) the following irregularity not covered by the subject planning application has been detected by his office:
 - Unlawful occupation of GL adjoining Lots 169 and 170 in D.D. 86 not covered by the planning application

the GL adjoining Lots 169 and 170 in D.D. 86 has been illegally occupied with concrete paving without any permission. Any occupation of GL without Government's prior approval is an offence under the Land (Miscellaneous Provisions) Ordinance (Cap. 28). LandsD objects to the planning application since there is illegal occupation of GL which regularisation would not be considered according to prevailing land policy. The lot owner(s) should immediately cease the illegal occupation of GL and remove the unauthorised concrete paving as demanded by LandsD. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice;
 - (v) subject to the approval of the Board to the planning application which shall have reflected the rectification as aforesaid required, the lot owners shall apply to his office for Short Term Waiver (STW) to permit the proposed structures. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that they will be approved. The STW, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fees and

administrative fee as considered appropriate to be imposed by LandsD. In addition, LandsD reserves the right to take enforcement action against the lot owner(s)/applicant for any breach of the lease conditions, including the breach(es) already in existence or to be detected at any point of time in future, and land control action for any unlawful occupation of GL;

- (vi) the lot owner(s) should comply with all the land filling requirements imposed by relevant government departments in particular the requirement related to the natural stream within the Site. GL should not be disturbed unless with prior approval;
- (d) to note the comments of the Commissioner for Transport (C for T) that the access road connecting the Site and Kong Nga Po Road is not managed by the Transport Department (TD); the land status of the local access road should be checked with LandsD; the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities; sufficient manoeuvring space within the Site shall be provided; and no vehicles is allowed to queue back to or reverse onto/from public road at any time during the planning approval period;
- (e) to note the comments of the Chief Highway Engineer/New Territories East, Highways Department (CHE/NTE, HyD) that the proposed access arrangement should be commented by TD; HyD is not/shall not be responsible for the maintenance of any access connecting the Site and the nearest public road; and adequate drainage measures should be provided to prevent surface water running from the Site to the nearby public roads and drains;
- (f) to note the comments of the Director of Environmental Protection (DEP) that the applicant should observe the requirements of the ‘Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites’; implement relevant mitigation measures listed in the Recommended Pollution Control Clauses for Construction Contracts (https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/guide_ref/rpc.html) during land filling; and if toilet is provided, to provide suitable sewage treatment facilities as required under the Professional Persons Environmental Consultative Committee Practices Notes (ProPECC PN) 1/23 ‘Drainage Plans subject to Comment by the Environmental Protection Department’ and are duly certified by an Authorized Person (AP) or employ licensed waste collector to regularly collect and properly dispose of the sewage collected in the proposed toilet;
- (g) to note the comments of the Director of Agriculture, Fisheries and Conservation (DAFC) that the applicant should implement good site practices to avoid adverse impacts on the nearby environment including trees and vegetation;
- (h) to note the comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. The applicant should seek approval for any proposed tree works from relevant government departments prior to commencement of the works;
- (i) to note the following comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) that:
 - (i) the Site is in an area where no public sewerage connection is available. DEP should be consulted regarding the sewage treatment/disposal facilities for the proposed uses; and
 - (ii) the applicant should be advised the following general requirements in the drainage proposal:

- surface channel with grating covers should be provided along the site boundary;
- a drainage plan should be provided clearly showing the size, levels and routes of the proposed drainage. The details (invert level, gradient, general sections etc.) of the proposed drain/surface channel, catchpits and the discharge structure shall be provided;
- the cover levels of proposed channels should be flush with the existing adjoining ground level;
- a catchpit with covers should be provided where there is a change of direction of the channel/drain. The details of the catchpit with covers shall be provided;
- catchpits with sand trap shall be provided at the outlets of the proposed drainage system. The details of the catchpit with sand trap should be provided;
- to check and ensure that the existing drainage downstream to which the proposed connection will be made have adequate capacity and satisfactory condition to cater for the additional discharge from the Site. The applicant should also ensure that the flow from the Site will not overload the existing drainage system;
- where walls are erected or kerbs are laid along the boundary of the Site, peripheral channels should be provided on both sides of the walls or kerbs, and/or adequate openings should be provided at the walls/kerbs to allow existing overland flow passing through the Site to be intercepted by the drainage system of the Site with details to be agreed by DSD, unless justified not necessary;
- all existing flow paths as well as the run-off falling onto and passing through the Site should be intercepted and disposed of via proper discharge points. The applicant shall also ensure that no works, including any site formation works, shall be carried out as may adversely interfere with the free flow condition of the existing drains, channels and watercourses on or in the vicinity of the Site any time during or after the works;
- the proposed drainage works, whether within or outside the site boundary, should be constructed and maintained properly by the applicant and rectify the system if it is found to be inadequate or ineffective during operation at his/her own expense;
- for works to be undertaken outside the lot boundary, the applicant should obtain prior consent and agreement from DLO/N, LandsD and/or relevant private lot owners;
- to make good all the adjacent affected areas upon the completion of the drainage works;
- to allow all time free access for the Government and its agent to conduct site inspection on his completed drainage works;
- the applicant and the successive lot owners shall allow connections from the adjacent lots to the completed drainage works on GL when so required; and
- photos should be submitted clearly showing the current conditions of the area around the Site, the existing drainage/flowpaths around the Site, the proposed drainage from the Site to the downstream existing watercourse and the existing watercourse at about 20m intervals. The locations of the camera and the direction of each photo should

also be indicated on a plan;

- (j) to note the comments of the Director of Fire Services (D of FS) that:
 - (i) in consideration of the design/nature of the proposal, fire service installations (FSIs) are anticipated to be required. The applicant should submit relevant layout plans incorporated with the proposed FSIs to his satisfaction. In addition, the applicant should note that the layout plans should be drawn to scale and depicted with dimensions and nature of occupancy; the location of the proposed FSIs to be installed should be clearly marked on the layout plans; and
 - (ii) if the proposed structures are required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans;
- (k) to note the comments of the Director of Electrical and Mechanical Services (DEMS) that:
 - (i) to observe the requirements of minimum safety clearance, minimum vertical clearance and preferred working corridor of the concerned overhead lines as stipulated in Clause 2.3.5, 2.3.6 and 2.3.14 under Chapter 7 – Utility Services of the Hong Kong Planning Standards and Guidelines published by the Planning Department and ensure they shall be maintained at any time during and after construction;
 - (ii) no scaffolding, crane and hoist shall be built or operated within 6m from the outermost 400kV conductors at all times. Warning notices should be posted at conspicuous locations to remind operators and workers of the site boundary. CLP Power shall be consulted on the safety precautions required for carrying out any works near the concerned overhead lines;
 - (iii) in any time during and after construction, CLP Power shall be allowed to get access to the working corridor area of the concerned overhead lines for carrying out any operation, maintenance and repair work including tree trimming;
 - (iv) as regards the electric and magnetic fields arising from the transmission overhead lines, the applicant should note the possible undue interference to some electronic equipment in the vicinity, if any; and
 - (v) the Electricity Supply Lines (Protection) Regulation (the Regulation) and the ‘Code of Practice on Working near Electricity Supply Lines’ established under the Regulation shall be observed when carrying out works in the vicinity of the electricity supply lines;
- (l) to note the comments of the Project Manager (North), Civil Engineering and Development Department (PM(N), CEDD) that the proposed use is located partly within the proposed New Territories North (NTN) New Town under the Planning and Engineering (P&E) Study for NTN New Town and Man Kam To. The preliminary development proposal for NTN New Town was released in December 2024. While the implementation programme of NTN New Town is being formulated under the P&E Study, the site formation works will likely commence soon after the completion of detailed design in next stage. Hence, the applicant is reminded that subject to the land use planning in the P&E Study, the proposed use, if approved, may need to be vacated for the site formation works; and
- (m) to note the following comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that:

- (i) it is noted that two structures are proposed in the application. Before any new building works are to be carried out on site, prior approval and consent of the Building Authority (BA) should be obtained unless they are exempted building works or commenced under the simplified requirement under the Minor Works Control System, otherwise they are unauthorized building works under the BO. An AP should be appointed as the co-ordinator for the proposed building works in accordance with the BO;
- (ii) the Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulation (B(P)R);
- (iii) the Site is not abutting on a specified street having a width not less than 4.5m, the development intensity shall be determined by the BA under Regulation 19(3) of the B(P)R at building plan submission stage;
- (iv) if any existing structure is erected on leased land without the approval of the BA, they are UBW under the BO and should not be designated for any proposed uses under the application;
- (v) for UBW erected on leased land, enforcement action may be taken by BD to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the Site under the BO;
- (vi) before any new building works (including containers/open sheds as temporary buildings, demolition and land filling, etc.) are to be carried out on the Site, prior approval and consent of the BA should be obtained, otherwise they are UBW under the BO. An AP should be appointed as the co-ordinator for the proposed building works in accordance with the BO;
- (vii) any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the control of Part VII of the B(P)R;
- (viii) in general, there is no requirement under the BO in respect of provision of car parking spaces for the proposed uses. However, the applicant' attention is drawn to the provision of accessible car parking spaces designated for the use of persons with a disability as per the requirements under Regulation 72 of the B(P)R and Division 3 of Design Manual: Barrier Free Access 2008;
- (ix) the applicant' attention is drawn to the provision under Regulations 40 and 41 of the Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulation in respect of disposal of foul water and surface water respectively;
- (x) the 7m high warehouses are considered excessive. It should be justified upon formal plan submission to BD; and
- (xi) detailed checking under the BO will be carried out at building plan submission stage.

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

參考編號
Reference Number: 260721-222643-36008

提交限期
Deadline for submission: 11/08/2026

提交日期及時間
Date and time of submission: 21/07/2026 22:26:43

有關的規劃申請編號
The application no. to which the comment relates: A/NE-HLH/93

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Bryan Kok

意見詳情
Details of the Comment :

本人支持规划申请 A/NE-HLH/93。五金及建筑材料需要合适和管理完善的地方储存，以便相关工程、维修及保养工作能够获得稳定的物料供应。拟议的三年期临时仓库具有实际用途，可改善材料存放和调配安排。

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

參考編號
Reference Number: 260721-222343-36993

提交限期
Deadline for submission: 11/08/2026

提交日期及時間
Date and time of submission: 21/07/2026 22:23:43

有關的規劃申請編號
The application no. to which the comment relates: A/NE-HLH/93

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. 刘文阳

意見詳情
Details of the Comment :

From my experience, construction projects can be delayed when materials are not stored or supplied efficiently. A properly operated warehouse for hardware and construction materials could provide practical support to people working in the industry.
For this reason, I support the application. I hope the operator will maintain good site management, keep the surrounding roads clean and minimise noise, dust and heavy-vehicle disturbance.



tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年08月03日星期一 11:24
收件者: tpbpd/PLAND
主旨: 強烈反對將恐龍坑丈量約份第86約多個地段、第87約地段第306號及第307號和毗連政府土地,「綠化地帶」及「農業」改作臨時貨倉存放五金及建築材料及相關填土工程
類別: Internet Email

收件人: 城市規劃委員會

強烈反對將恐龍坑丈量約份第 86 約多個地段、第 87 約地段第 306 號及第 307 號和毗連政府土地「綠化地帶」及「農業」改作臨時貨倉存放五金及建築材料及相關填土工程(規劃申請編號: A/NE-HLH/93)

本人是恐龍坑居民及土地關注者

謹此對上述將農地改作倉儲用途的規劃申請,表達最強烈的反對意見。有關改劃將為社區帶來嚴重安全威脅及生態破壞,具體理據如下:

一:消防水源嚴重不足,面臨災難性火警風險缺乏消火水龍頭:申請地段及周邊鄉郊範圍缺乏足夠的消防水龍頭,水壓與水源根本無法應付大型火警。現時附近已存在大量廢料回收場,囤積了大量易燃物質。若該處再增設倉地,一旦發生火警,在缺乏水源的情況下極易引發連環大火,後果不堪設想。危害居民生命:大火產生的毒煙會直接威脅附近居民的生命安全,鄉郊消防基礎設施根本無法承受此風險。

二:加重交通負荷、阻礙緊急救援重型車輛擠塞:倉儲運作必然引致大量貨櫃車、泥頭車及重型貨車出入。阻礙消防車進出:村內道路本已狹窄,重型車輛將嚴重阻塞交通。一旦發生火警,消防車及救護車將極難駛入,嚴重延誤救援黃金時間。

三:破壞天然排水道、加劇水浸風險失去雨水滲透力:該農地鄰近天然排水河道/農田水道,做成居民出入已做成極大風險,改作倉地並鋪設石屎後,將失去吸水功能。暴雨水浸民居:極端天氣下,雨水無處疏導將直接湧向附近民居,大幅提高鄰近區域的水浸危機,現時他開展平整工程後已經做成道路經常水浸。

四:破壞生態與環境、改劃會永久破壞土壤結構,與鄉郊保育背道而馳。嚴重滋擾民居:貨倉運作產生的噪音、粉塵及夜間強光,將嚴重剝奪居民享有安寧居住環境的權利。綜上所述,有關申請不單破壞環境,更將周邊居民置於極高的火災及安全隱患之中。

懇請城規會以市民生命財產安全為首要考慮,否決此項申請。

3/8/2026

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

黃耀強



tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年08月10日星期一 1:11
收件者: tpbpd/PLAND
主旨: A/NE-HLH/93 DD 86 and 87 Hung Lung Hang
類別: Internet Email

A/NE-HLH/93

Lots 169,173,174,177 in D.D. 86, Lots 306 and 307 in D.D. 87 and Adjoining Government Land, Hung Lung Hang

Site area: About 4,615sq.m (Includes Government Land of about 140sq.m)

Zonings: "Green Belt" and "Agriculture"

Applied use: Warehouse for Storage of Hardware and Construction Materials / 4 Vehicle Parking / **Filling of Land**

Dear TPB Members,

Strongest Objections. "Green Belt" and no previous history of approvals and certainly not Cat 2.

"There is no active storage operation, warehouse operation, open storage of goods, vehicle parking, workshop activity or existing structure within the application boundary."

"The Applicant has an existing warehouse operation at D.D. 125, Lot 674, with a total operational area of about 1,300 m² and a covered warehouse area of about 800 m². The existing business premises are affected by Hung Shui Kiu New Development Area."

SO TOTAL AREA OF 2,100SQ.M

The operator intends to fill in the entire site.

There is absolutely NO JUSTIFICATION to approve this application and if it is streamlined and rubberstamped then the matter will have to be taken up with the Ombudsman as approval would clearly breach all current planning guidelines.

Mary Mulvihill

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

5

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年07月24日星期五 16:12
收件者: tpbpd/PLAND
主旨: WWF s16_A_NE-HLH_93 20260724
附件: s16_A_NE-HLH_93 20260724 WWF.pdf
類別: Internet Email

Dear Sir/Madame,

Attached please find our submission regarding the planning application **A/NE-HLH/93**.

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

24 July 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 for Storage of Hardware and Construction Materials and Associated Filling of Land for a Period of 3 Years in the "Green Belt" and "Agriculture" zones in Hung Lung Hang (A/NE-HLH/93)

We would like to reject the captioned.

Not in line with the "Green Belt" 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.

Inadequate planning information on environmental risks and landscape impact

The applicant has failed to demonstrate that the proposed development, together with the associated land filling and site formation works, would not result in significant adverse environmental impacts. In particular, insufficient information has been provided to show that the proposal would not alter existing drainage patterns, reduce flood storage capacity, or impede overland flow paths, thereby exacerbating flooding risks within the surrounding catchment. Given the increasing flood vulnerability in the Northern New Territories, where low-lying areas and interconnected drainage systems are already subject to flood pressure during intense rainfall events, the proposal may contribute to heightened flood risks both on-site and downstream. Furthermore, the applicant has not adequately demonstrated that the proposed land filling works would avoid detrimental landscape impacts on the surrounding rural and natural environment.

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：黃碧儀女士

核數師：富容瑪潔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)

The Application Site Appears to Have Been Previously Concretized

Based on a comparison between the Filling of Land Plan (Annex 2) and imagery available on Google Maps, a point of interest named “文錦渡牛記” appears to be located within the Application Site (Figure 1a). Further examination of this location suggests that a portion of the Application Site has been previously concretized and/or subjected to site formation works (Figure 1b).

This observation raises questions regarding the existing conditions of the Site and the extent of any previous land alteration activities. The Applicant should therefore clarify the current site conditions, including whether any land filling, site formation, or other development works have been undertaken within the Site prior to the submission of the application.

While we do not have up-to-date information on the current land use status of the Site, nor any evidence confirming whether an unauthorized development or change of land use has occurred, we respectfully request that the Town Planning Board invite the relevant government departments to investigate whether any unauthorized land use, land filling, site formation works, or other development activities have taken place within the Application Site.

Should any unauthorized development or land use irregularities be identified, we respectfully submit that the application should be rejected. Approval of the application under such circumstances could create the perception of legitimizing unlawful land use or development undertaken prior to the granting of the necessary planning permissions, thereby undermining the integrity of Hong Kong's planning control system.

We would be grateful if our comments could be considered.

Kind regards,

Mr. Tobi Lau

Senior Manager, HK Biodiversity and Conservation Policy

WWF Hong Kong

Figure 1a. Comparison between the Filling of Land Plan (Annex 2) of the Application and Google Maps imagery showing the location of “文錦渡牛記” within the Application Site

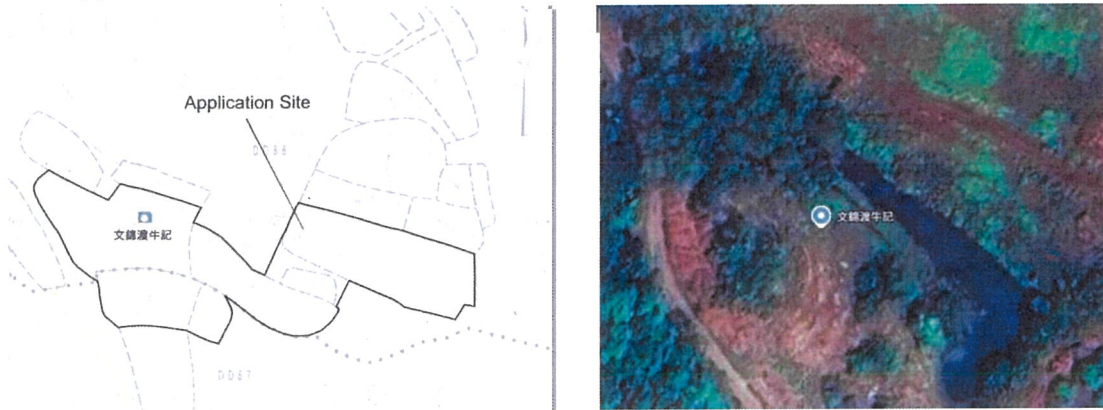


Image source: *Left*: Filling of Land Plan (Annex 2) and *Right*: Google Street Map (Accessed on 24 July 2026)

Figure 1b. The Application Site appears to be formed with concrete



Map Source: Google Street Map by clicking into “文錦渡牛記” (Accessed on 24 July 2026) <https://shorturl.at/UBrhO>

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

參考編號

Reference Number:

260721-222913-08692

提交限期

Deadline for submission:

11/08/2026

提交日期及時間

Date and time of submission:

21/07/2026 22:29:13

有關的規劃申請編號

The application no. to which the comment relates:

A/NE-MKT/68

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. 袁丁

意見詳情

Details of the Comment :

I support Planning Application No. A/NE-HLH/93. There is a practical need for suitable storage space for hardware and construction materials, and the proposed temporary warehouse could help improve material supply and storage arrangements. Approval should be subject to proper traffic, drainage, dust and environmental controls.

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